Guidance

Electricity Usage Reporting for Licensees

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All applications for renewal of a license to engage in commercial cannabis cultivation shall include required reporting for each power source indicated on the application for licensure for the previous annual licensed period (e.g., if you are renewing a license on May 1, 2022, provide the electricity use for May 1, 2021, through April 30, 2022). This guidance will provide licensees with the tools and resources necessary for reporting at time of renewal and for determining whether they are required to meet renewable energy requirements.

Background

Since January 1, 2022, all licensed commercial cannabis cultivators, including microbusinesses authorized to engage in cultivation, have been required to provide total electricity for each power source used for all cannabis activities to the Department of Cannabis Control (DCC) upon license renewal.

Examples of electrical equipment and devices typically used in these types of commercial cannabis cultivation operations include: grow lights, supplemental lighting, HVAC systems, dehumidifiers, fans, security cameras, and electrical pumps. Power sources that are typically used to supply power to these commercial cannabis cultivation operations, may include:

- Utility providers
- Zero net energy renewable sources (such as solar and wind)
- All other electricity sources (such as generators and fuel cells)

Please be aware that there may be other local rules, state laws or regulations that govern electricity use that licensees may be required to comply with as part of their day-to-day operations.

Renewable Energy Requirements

Beginning January 1, 2023, DCC cultivation and microbusiness licensees authorized to engage in indoor, tier 2 mixed-light cultivation, or nursery using indoor or tier 2 mixed-light techniques, are required to report total electricity for each power source used to the DCC upon license renewal and comply with the renewable energy requirements.[1]

Specifically, such licensees must have an average weighted greenhouse gas emission intensity (AWGGEI) that is less than or equal to the AWGGEI of their local utility provider. Such licensees are required to obtain carbon offset credits if the AWGGEI is greater than their utility provider's.[2]

[1] *California Code of Regulations (CCR), tit. 4, § 15020(e)*

[2] *CCR, § 16305.*

Generator Requirements

Current regulations require licensed cultivators using generators rated at 50 horsepower and greater demonstrate compliance with the Airborne Toxic Control Measure for stationary or portable engines, as applicable, established in California Code of Regulations, title 17, sections 93115 to 93116.5. All generators used by licensed cultivators shall be equipped with non-resettable hour-meters. If a generator does not come equipped with a non-resettable hour-meter, an after-market non-resettable hour-meter shall be installed.

Licensed cultivators using generators rated below 50 horsepower must meet the following requirements:

- Either:
  - Meet the "emergency" definition of portable engines in California Code of Regulations, title 17, section 93116.2(a)(12), or the "emergency use" definition for stationary engines in California Code of Regulations, title 17, section 93115.4(a)(30); or
  - Operate 80 hours or less in a calendar year; and

- Either:
  - Meet Tier 3 with Level 3 diesel particulate filter requirements in California Code of Regulations, title 13, sections 2700-2711; or
  - Meet Tier 4 requirements, or current engine requirements if more stringent, in title 40, Code of Federal Regulations, chapter I, subchapter U, part 1039, subpart B, section 1039.101.

How to Submit Electricity Usage Information

Cultivation, Nursery, and Processor Licenses

Submit electricity usage information, such as the Electricity Reporting Worksheet, via a Science Amendment during the renewal period prior to the license expiration date.

Microbusiness Licenses with Cultivation Activities

Submit the electricity usage information, such as the Electricity Reporting Worksheet, to the Environmental Evaluation Office via email at environmentalreview@cannabis.ca.gov during the renewal period prior to the license expiration date.

Electricity Reporting Worksheet Instructions

A licensee may complete the *Electricity Reporting Worksheet* to report electricity usage or use another document that contains all the same information. **The *Electricity Reporting Worksheet* will complete all the calculations for you after you enter a few data fields, and it is highly recommended you utilize the form**.

The *Electricity Reporting Worksheet* contains three sections to report power source information from the following sources:

1. Utility provider
2. Zero net energy renewable resource(s)
3. Other sources

If you are not using the Worksheet, please round kilowatt hours (kWh) to the nearest one digit or whole number. The greenhouse gas intensity should be rounded to two decimal places.

Licensees must provide the total electricity supplied to the cultivation project for the previous annual licensed period. DCC may request additional information on the calculation methods and documentation.

The following pages outline the step-by-step process to follow when filling out the *Electricity Reporting Worksheet*.

Electricity From Utility Provider

Complete this section if any electricity utilized is supplied by a utility provider. This section should be completed for licensees connected to a utility provider regardless of whether a zero net energy renewable resource is used.

Check the box next to “Utility provider not used” if you do not use any energy from the grid. If you use a utility provider, check the box next to “Utility provider used” and complete the relevant sections.

Line 1. Name of Utility Provider

Provide the name of the utility provider. The name of the utility provider can be found on the utility bill produced by the utility provider.

Utilities included in a lease agreement may require a licensee to contact their landlord for utility provider information.

Next to "Select One", select one of the following options from the drop-down menu:

- Electricity from grid only, or
- Electricity from renewable energy and part of net metering program.

Once the option is selected from the drop-down menu, the relevant fields will automatically appear for data entry.

If you obtain electricity only from the grid, you will complete Lines 1a through 1d. If you utilize renewable energy and participate in a net metering program, you will complete Lines e through j. Net metering means you only pay for the energy that you use, typically calculated as the difference between the amount of renewable energy produced and that consumed from the utility provider; when excess energy is produced by the renewable energy system, that energy is transferred to the grid to be distributed by the utility provider.

Electricity from Grid Only

Line 1 a. Total electricity supplied

To determine total electricity supplied follow the steps below:

- Add the monthly kilowatt-hours (kWh) reported in each utility bill issued by the utility provider for the previous annual licensed period.
    - If the utility bill does not cover a complete month, prorate the electricity[3]

Line 1 b. Number of licenses covered in bill

Enter the number of licenses served by the utility bill.

Line 1 c. Total electricity supplied to each license

The Worksheet automatically calculates this value by dividing Line 1 a by Line 1 b.

Line 1 d. Utility's GHG emission intensity

Record the utility's Greenhouse Gases (GHG) emissions intensity from the power content label.

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[3] *Divide the total number of days in in the month that are in the reporting period by the total number of days in the utility bill period.*

If the reported GHG emission intensity is given in lbsCO_2e/MWh on the power content label convert it to lbsCO_2e/kWh.[4] The *Electricity Reporting Worksheet* completes this conversion automatically.

The GHG emissions intensity can be found on the power content label[5] from the utility provider found on their website. Licensees must provide the greenhouse gas emission intensity per kWh reported by the utility provider for the most recent calendar year available[6]. For example, if the license is renewed in February of 2023 with electricity use in 2022, the most recent power content label would be for 2021.

Electricity from Renewable Energy and Part of Net Metering Program

Please report both the electricity supplied by the renewable energy source and the net electricity provided by the utility. While only the net electricity provided by the utility is required by regulation, the electricity used by the renewable source is requested so that the Department has a thorough understanding of the total electricity usage for the license.

Line 1 e. Total electricity supplied by a zero net energy renewable resource

Report the total electricity supplied by the zero net energy renewable resource.

Line 1 f. Number of licenses

Enter the number of licenses.

Line 1 g. Total renewable electricity supplied to each license

The Worksheet automatically calculates this value by dividing Line 1 e by Line 1 f.

Line 1 h. Total electricity provided by the utility provider

Enter the amount of electricity provided by the utility. If only one license held, report the total electricity provided by the utility provider.

Line 1 i. Total electricity supplied to each license

The Worksheet automatically calculates this value by dividing Line 1 h by Line 1 f.

Line 1 j. Utility's GHG emission intensity

See Line 1 d instructions for guidance on finding the utility provider's GHG emission intensity.

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[4] *Mega Watts is converted to kilo Watts by dividing lbsCO2e/MWh by 1000*

[5] *A power content label is a document produced by a utility provider containing information on GHG emissions intensities and electricity production.*

[6] *Greenhouse gas emission intensity per kWh is a pollution rate that measures the mass of GHG, represented as CO2e, emitted into the atmosphere to generate one kilowatt hour of electricity from a given electricity source.*

Electricity from Zero Net Energy Renewable Sources

Electricity supplied by an off grid renewable energy source[7] that is not part of a net metering or other utility benefit[8] must be reported.

If an off grid renewable energy source is not used, check the box "Off-grid renewable energy not used".

Check the box next to "Off grid renewable electricity used" if electricity is obtained from an off-grid energy source (i.e., one that is not part of a net metering program); the total electricity supplied is required.

Line 2. Total electricity supplied by a zero net energy renewable source(s) not part of a net metering or other utility benefit.

Enter total electricity in kWh.

Total electricity can be determined by the following methods:

- Direct measurement using a metering system
- Estimating the electricity produced by the solar system using the PVWatts Calculator
- Calculating the estimated electricity demand of all appliances by using the optional *Electricity Demand Spreadsheet*

If you do not have a metering system and cannot enter the total electricity supplied directly, instructions on using the PVWatts Calculator and the *Electricity Demand Spreadsheet* can be found in *Appendix C: Calculators and Resources*. Once the total electricity is calculated using one of those methods, enter the value in Line 2.

If you have multiple renewable energy sources to report in this section, add all of them together and enter the total electricity in Line 2.

Electricity from Other Sources

Complete this section if electricity is supplied from an unspecified source (e.g., generators, fuel cells, etc.) that is not reported to the utility provider.[9]

If other unspecified sources are not used, check the box "Other electricity sources not used".

If other sources are used, check the box "Other electricity sources used". The following information is required:

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[7] *Biomass and biowaste, geothermal, eligible hydroelectric, solar, and wind.*
[8] *See Pub. Resources Code, § 398.4, subd. (h)(5).*
[9] *Defined by section 398.2(e) of the Public Utilities Code, and/or other onsite sources of generation not reported to the local utility provider (e.g., generators, fuel cells)*

- The source of electricity production
- Total electricity in kWh
- Greenhouse gas emission intensity per kWh.

The Worksheet provides space for one unspecified source. If you have more than one unspecified source, please email the Environmental Evaluations Office for assistance at environmentalreview@cannabis.ca.gov.

In "Source Type" enter the source type, such as generator.

If a generator is used, for "Generator rated", select one of the following generator horsepower ratings from the drop-down menu:

- Less than 50 hp, or
- Greater than 50 hp

The licensee may also provide the type, make, model, engine model, and horsepower for the electricity source in use. While not required this information will assist the Department in developing potential future guidance, policies, and regulations.

Dependent on the source, the method used to determine the electricity supplied and the GHG emissions intensity will vary. There are multiple methods that may be used to calculate the electricity supplied and GHG emissions intensity depending on what is known about the energy source. The Worksheet offers several methods for determining electricity usage and each is described below.

Next to "Total electricity calculated from", select one of the following electricity calculation options from the drop-down menu:

- Direct measurement of electricity use
- Fuel usage
- Hours of usage
- Electricity Demand Spreadsheet
- Other

Once the option is selected from the drop-down menu, the relevant fields will automatically appear for data entry.

For more information on the methods that can be used to determine electricity usage and the calculations used in the Worksheet, see *Appendix B: Calculations*. DCC may request additional information on the calculation methods and supporting documentation.

Direct Measurement of Electricity Use

Line 3 a. Total energy used from meter reading

If energy usage was measured directly, such as from a meter, enter the total energy used.

Next to “Select fuel type”, select one of the fuel type and generator horsepower ratings from the drop-down menu:

- Gasoline (<= 50 hp engine)
- Gasoline (> 50 hp engine)
- Diesel (<= 100 hp engine)
- Diesel (> 100 hp engine)
- Propane (<= 50 hp engine)
- Propane (> 50 hp engine)
- Natural gas

Lines 3 b. GHG emission intensity of fuel source

The Worksheet automatically populates this field based on your selection in the drop-down menu for “Select fuel type”.

Line 3 c. GHG emission intensity for license

The Worksheet automatically populates this field based on your selection in the drop-down menu for “Select fuel type”.

Calculate Total Energy Based on Fuel Usage

Next to “Select fuel type”, select one of the following generator fuel type and horsepower ratings from the drop-down menu:

- Gasoline (<= 50 hp engine)
- Gasoline (> 50 hp engine)
- Diesel (<= 100 hp engine)
- Diesel (> 100 hp engine)
- Propane (<= 50 hp engine)
- Propane (> 50 hp engine)
- Natural gas

Once the option is selected from the drop-down menu, the relevant fields will automatically appear for data entry, and some will auto-populate with values.

Next to “Fuel Consumption” enter the total amount of fuel used in gallons.

Line 3 a. Total energy used

The Worksheet automatically calculates this value once fuel consumption is entered.

Line 3 b. Greenhouse gas emission intensity of fuel source

The Worksheet automatically populates this field based on your selection in the drop-down menu for “Select fuel type”.

Line 3 c. GHG emission intensity for license

The Worksheet automatically populates this field based on your selection in the drop-down menu for “Select fuel type”.

Calculate Total Energy Based on Hours of Usage

Next to “Select equipment Output Units”, select one of the following units from the drop-down menu:

- Horsepower, or
- Watts

Next to “Select fuel type”, select one of the following generator fuel type and horsepower ratings from the drop-down menu:

- Gasoline (<= 50 hp engine)
- Gasoline (> 50 hp engine)
- Diesel (<= 100 hp engine)
- Diesel (> 100 hp engine)
- Propane (<= 50 hp engine)
- Propane (> 50 hp engine)
- Natural gas

Once the options are selected from the drop-down menu, the relevant fields will automatically appear for data entry, and some will auto-populate with values.

Enter the equipment horsepower or rated electrical output in watts, based on the selection in “Select Equipment Output Units”.

In “Hours of Usage”, enter the total hours the equipment was used.

Line 3 a. Total energy used

The Worksheet automatically calculates this value once equipment output and hours of usage are entered.

Line 3 b. GHG emission intensity of fuel source

The Worksheet automatically populates this field based on your selection in the drop-down menu for “Select fuel type”.

Line 3 c. GHG emission intensity for license

The Worksheet automatically populates this field based on your selection in the drop-down menu for “Select fuel type”.

Total Electricity Calculated from Electricity Demand Spreadsheet

Line 3 a. Total energy used from Electricity Demand Spreadsheet

Enter the total electricity demand as calculated in the *Electricity Demand Spreadsheet*.

Next to "Select fuel type", select one of the fuel type and generator horsepower ratings from the drop-down menu:

- Gasoline (<= 50 hp engine)
- Gasoline (> 50 hp engine)
- Diesel (<= 100 hp engine)
- Diesel (> 100 hp engine)
- Propane (<= 50 hp engine)
- Propane (> 50 hp engine)
- Natural gas

Line 3 b. GHG emission intensity of fuel source

The Worksheet automatically populates this field based on your selection in the drop-down menu for "Select fuel type".

Line 3 c. GHG emission intensity for license

The Worksheet automatically populates this field based on your selection in the drop-down menu for "Select fuel type".

Average Weighted Greenhouse Gas Emission Intensity

Line 4. Average Weighted Greenhouse Gas Emission Intensity (AWGGEI)

The Worksheet will automatically calculate this value based on your entries in the first three sections.

For more information on AWGGEI and the calculations, see Appendix B: Calculations.

Appendix A: Fuel Properties by Fuel Type

Greenhouse Gas Emissions Intensity by Fuels Type for Other Electricity Source Category

Category	Greenhouse Gas Emissions Intensity
Gasoline	19.42 lbs CO_2e/gallon
Diesel	22.577 lbs CO_2e/gallon
Propane	12.824 lbs CO_2e/gallon
Natural Gas	0.016042 lb CO_2e/gallon

Source: *CARB Mandatory Greenhouse Gas Reporting Regulation and US EPA Mandatory Greenhouse Gas Reporting Regulation. Units have been converted to present in appropriate units for these calculations. The methane and nitrous oxide emissions have been included with their global warming potentials.*

Default Values by Fuels Type

Gasoline	Default Value
50 hp or less engine Brake Specific Fuel Consumption	0.55 lb/bhp-hr
50 hp or greater engine Brake Specific Fuel Consumption	0.70 lb/bhp-hr
Density of Fuel	6.17 lb/gallon
Default load factor	0.68

Diesel	Default Value
100 hp or less engine Brake Specific Fuel Consumption	0.408 lb/bhp-hr
100 hp or greater engine Brake Specific Fuel Consumption	0.367 lb/bhp-hr
Density of Fuel	7.1 lb/gallon
Default load factor	0.74

Propane	Default Value
50 hp or less engine Brake Specific Fuel Consumption	0.55 lb/bhp-hr
50 hp or greater engine Brake Specific Fuel Consumption	0.70 lb/bhp-hr
Density of Fuel	4.24 lb/gallon
Default load factor	0.68

For natural gas the fuel consumption values and load factors should be taken from the generator specification sheets, which are available on the most popular brands of natural gas generators on the manufacturer's websites.

Other common load factors are available on the California Air Resources Board emission models website.

Appendix B: Calculations

While the *Electricity Reporting Worksheet* performs all calculations necessary for licensees to report their energy usage, the formulas and equations used in sections 3 and 4 are presented below in case the licensee wishes to know more about how these values are calculated.

Electricity Calculations for Unspecified Sources

Electricity calculations can be made using any of the following:

- Direct measurement
- Fuel Usage
- Hours of usage
- Using the Electricity Demand Spreadsheet
- Alternative calculation methods not described in this Guide.

Direct Measurement

Direct measurement of energy used can be made by implementing a metering system.

Calculations Based on Fuel Usage

Electricity can be calculated from fuel usage by accounting for the total volume of fuel consumed during the previous annual licensed period.

Calculation of total electricity:

$$E = \frac{F \times D}{B} \times 0.7457$$

Where:

- E is the total electricity consumed, in kWh
- F is the total fuel consumption, in gallons
- D is the fuel density, in lb/gallon
- B is the brake-specific fuel consumption, in lb/bhp-hr
- 0.7457 is a conversion factor to convert from bhp-hr to kWh

The default fuel density and brake specific fuel consumption values for diesel, gasoline, and propane may be found in the tables listed in *Appendix A: Fuel Properties by Fuel Type*. For natural gas, these values can be found in the specification sheet for your generator, or on the manufacturer's website.

Calculation of Green House Gas (GHG) emission intensity for the license:

The GHG emission intensity for the license is calculated using the GHG emission intensity of the fuel source, the quantity of fuel used, and the total energy supplied, as follows:

$$I_L = I_F \times \frac{\mathrm{F}}{\mathrm{E}}$$

Where:

- I_L is the GHG emissions intensity for the license, in lb CO2e/kWh
- I_F is the GHG emissions intensity for the fuel source, in lb CO2e/gal
- F is the total fuel consumption, in gallons
- E is the total electricity used, in kWh

Calculations Based on Hours of Usage

Electricity can be calculated from hours of usage when a non-resettable hour meter is used. Different equations are required, depending on if the generator's power is given in watts or horsepower.

Calculation of total electricity (if your generator's power is given in watts):

$$E = t \times REO \times \frac{1}{1000}$$

Where:

- E is the total electricity consumed, in kWh
- t is the total time of usage, in hours
- REO is the rated electrical output of the generator, in watts
- 1/1000 is a conversion factor to convert from watt-hours to kWh

Calculation of total electricity (if your generator's power is given in horsepower):

$$E = t \times P \times L \times 0.7457$$

Where:

- E is the total electricity consumed, in kWh
- t is the total time of usage, in hours
- P is the power of the generator, in hp
- L is the load factor of the generator
- 0.7457 is a conversion factor to convert from bhp-hr to kWh

Calculation of Green House Gas (GHG) emission intensity for the license:

The GHG emission intensity for the license is calculated as follows:

$$I_L = I_F \times \frac{B}{D}$$

Where:

- I_L is the GHG emissions intensity for the license, in lb CO2e/kWh
- I_F is the GHG emissions intensity for the fuel source, in lb CO2e/gal
- B is the brake-specific fuel consumption, in lb/bhp-hr
- D is the fuel density, in lb/gal

Average Weighted Greenhouse Gas Emissions Intensity

The average weighted greenhouse gas emissions intensity (AWGGEI) is calculated using the GHG emission intensity of the license for each source (i.e., utility provider, zero net energy source, or generator), and the total electricity used for each source, as follows:

$$AWGGEI = \frac{(E_u \times I_{fu}) + (E_o \times I_{fo})}{E_u + E_z + E_o}$$

Where:

- AWGGEI is the Average Weighted Greenhouse Gas Emissions Intensity, in lb CO2e/kWh
- E_u is the total energy supplied by the utility, in kWh
- I_{fu} is the GHG emissions intensity of the license for the utility, in lb CO2e/kWh
- E_o is the total energy provided by the other fuel source, in kWh
- I_{fo} is the GHG emissions intensity of the license for the other fuel source, in lb CO2e/kWh
- E_z is the total energy supplied by a zero net energy renewable source, in kWh

Appendix C: Calculators and Resources

Photovoltaic (PV) Watts Calculator

When the total kilowatt hours of electricity produced by a licensee's solar system for the year is missing, then the licensee may estimate the solar power generation using the PVWatts Calculator provided by the National Renewable Energy Laboratory, which can be found on their website at: https://pvwatts.nrel.gov/

The PVWatts Calculator requires the licensee to enter the location of and information about their solar panel setup to determine the typical annual production of electricity from their solar panels.

Licensees may wish to install electricity meters for more accurate electricity demand reporting; however, it is not required.

Electricity Demand Spreadsheet

The *Electricity Demand Spreadsheet* can be used to calculate energy usage if direct measurement or the hours or fuel usage for the year is not available.

The *Electricity Demand Spreadsheet* automatically calculates how many kWh are used annually for all appliances[10] in daily use. The *Total Annual Demand* tab will provide the annual electricity demand after the following information is entered on each month's tab:

- Appliance quantity
- Appliance description
- Appliance maximum wattage (reported as watts)
- Hours each appliance is in use each day
- Total number of days in the month the appliance was used

After entering data into each of the twelve month-specific tabs, the total energy usage will be automatically calculated and displayed on the *Total Annual Demand* tab.

[10] *Appliances can include, but are not limited to, grow lights, supplemental lighting, HVAC systems, dehumidifiers, fans, security cameras, and water pumps.*

Appendix D: Data Sources Reference

California Air Resources Board Mobile Source Emissions Inventory Documentation.

California Air Resources Board Mandatory Greenhouse Gas Reporting Regulation.

Appendix E: Glossary

Brake-Specific Fuel Consumption: A measure of the fuel efficiency of a generator. For purposes of the Electricity Reporting Worksheet, average values may be used based on a standard generator of a given fuel type and are given in *Appendix A: Fuel Properties by Fuel Type*

Carbon Dioxide Equivalent (CO2e): A measure of the global-warming potential of greenhouse gas emissions as compared to an equivalent quantity of carbon dioxide. One pound of CO_2e indicates the emissions have the same global-warming impact as one pound of carbon dioxide.

Fuel Density: The weight of the fuel, in pounds, for a given volume of fuel (e.g., gasoline has a fuel density of 6.17 lb per gallon).

Greenhouse Gas Emissions Intensity for the License: The quantity of greenhouse gases emitted, in pounds of carbon dioxide equivalent (CO_2e), per kilowatt-hour of energy generated by a given energy source.

Greenhouse Gas Emissions Intensity for the Source: The quantity of greenhouse gases emitted, in pounds of carbon dioxide equivalent (CO_2e), per gallon of fuel for a given fuel type.

Load Factor: A measure of the electrical energy production efficiency of a generator. A higher load factor indicates less efficiency.

Rated Electrical Output: A measure of the maximum electrical load a generator can accommodate, generally given in watts or kilowatts.

Zero Net Energy Renewable Source: Eligible renewable energy resources pursuant to the California Renewables Portfolio Standard Program, as outlined in section 398.4(h)(5) of the Public Utilities Code.

The Department of Cannabis Control (DCC) licenses and regulates commercial cannabis activity within California. To learn more about the California cannabis market, state licenses or laws, visit cannabis.ca.gov. Email questions to info@cannabis.ca.gov or call 1-844-61-CA-DCC (1-844-612-2322).