From: <u>Mike Lepisto</u>

To: Pollock, Jeremy (BOS)
Cc: Joseph Kaylor; Cole Roberts

Subject: RE: BESS study feedback and presentation Date: Thursday, September 19, 2024 3:49:27 PM

Attachments: <u>image001.png</u>

image004.png image005.png image003.png image002.png image007.png

Jeremy,

Luminalt is correct.

24-02 does not state that CFC §1207.11 is not applicable to any "unit" or "system" over 20kWh. When the individual "unit" exceeds 20kWh, or the aggregate limit is exceeded, then CFC §1207.11 is no longer applicable. CFC §1207.11.2.1 supports this with a spacing between units requirement (which AB 5.12 incorporates by requiring UL9540A test data and manufacturer's installation instructions).

1207.11.2.1 Spacing.

Individual units shall be separated from each other by at least 3 feet (914 mm) of spacing unless smaller separation distances are documented to be adequate based on large-scale fire testing complying with <u>Section 1207.1.5</u>.

The 24-02 interpretation is referring to modular units which can be configured for varying capacities. This is obvious because question comes from Homegrid which sells units that can be configured between 9.6kWh to 38.4kWh

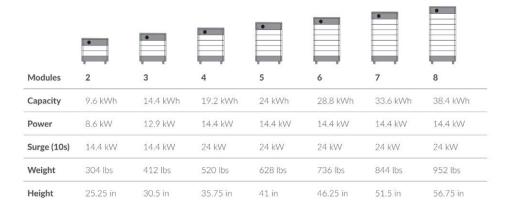
https://cdn.sanity.io/files/xcmp4e9i/production/90826f0975af48b98a2dd1a0963991e3870833e 6.pdf. If the capacity of one Stack'd Series unit is over 20kWh for the unit then \$1207.1 – .9 are applicable. For the current Stack'd Series (image below) 1-4 would follow SFFC \$1207.11 while 5-8 would follow \$1207.1 through \$1207.9.

HOMEGRID

STACK'D SERIES



OVERVIEW



As of today, 9/19, I am no longer able to access AB5.12 <u>Access Denied | SF Fire Website (sf-fire.org)</u>. However, yesterday 9/18 was accessible and stated:

2. Installation Requirements:

- a) Individual ESS Unit and ESS Spacing: individual ESS units shall be separated by at least 3-feet of spacing**; modular ESS products shall be considered as an individual unit and shall be limited to the maximum total individual unit capacity of 20 kWh.
 - **Note: A reduction of the 3-feet spacing requirement for individual ESS units may be reviewed and approved by the AHJ when complying with Sections 1207.1.5 and 104.8.2. Applicant shall submit copies of both the UL9540A testing report and the installation instructions showing the recommended reduced spacing between the ESS unit(s) being installed. If the minimum spacing varies between the two documents, the more restrictive separation distance will be approved.

Mike

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