

From: [Mike Lepisto](#)
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: [image001.png](#)
[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 When the individual “unit” exceeds 20kWh, or the aggregate limit is exceeded, then CFC §1207.11 is no longer applicable.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 [Section 1207.1.5](#).

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/90826f0975af48b98a2dd1a0963991e3870833e6.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.



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High Capacity
 Combine up to 15 units in parallel for 576 kWh.
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High Power
 A true whole-home backup available with 14.4 kW.
- 
Modular Design
 Each Stack contains 2-8 modules (4.8 kWh each). Easily add modules any time.
- 
Safe For Home + Environment
 Cobalt free, low voltage, meets the highest standards of safety.
- 
10 Year Warranty
 Our warranty is per component to support upgradability.
- 
Live Communication
 Real time display, mobile monitoring app, secure closed-loop communications.

OVERVIEW

							
Modules	2	3	4	5	6	7	8
Capacity	9.6 kWh	14.4 kWh	19.2 kWh	24 kWh	28.8 kWh	33.6 kWh	38.4 kWh
Power	8.6 kW	12.9 kW	14.4 kW	14.4 kW	14.4 kW	14.4 kW	14.4 kW
Surge (10s)	14.4 kW	14.4 kW	24 kW	24 kW	24 kW	24 kW	24 kW
Weight	304 lbs	412 lbs	520 lbs	628 lbs	736 lbs	844 lbs	952 lbs
Height	25.25 in	30.5 in	35.75 in	41 in	46.25 in	51.5 in	56.75 in

As of today, 9/19, I am no longer able to access AB5.12 [Access Denied | SF Fire Website \(sf-fire.org\)](http://Access Denied | SF Fire Website (sf-fire.org)). 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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