



Memorandum

September 17, 2024

To: Jeremy Pollock, Executive Officer, San Francisco Local Agency Formation Commission (LAFCo)

From: August Goers, Chief Technology Officer, Luminalt Energy Corporation

Subject: 20 kWh Energy Storage System Interpretation for Building Permit Threshold

In regards to the SFFD LAFCo BESS response letter dated August 23, 2024, I would like to provide a response to the statement that the 20 kWh system size threshold for R-3 or R-4 occupancies requires full building permit approval.

I believe there was a misunderstanding of CAL FIRE Code Interpretation 24-02. In Code Interpretation 24-02, the following question was asked and answered:

QUESTION:

Does the **CFC 1207.11.4** individual 20kWh limit apply when modularized units can be stacked beyond that limit?

ANSWER:

Yes. Per **CFC 1207.11.4**, each unit shall be 20kWh maximum. **ESS installations exceeding the permitted individual or aggregate ratings** shall be installed in accordance with California Fire Code Sections 1207.1 through 1207.9.

The SFFD LAFCo response letter stated that this “clarified that the 20 kWh limit applies to each Fire Code Sections 1207.1 through 1207.9.”

However, The CAL FIRE Code interpretation was referring to CFC 1207.11.4 Energy Ratings as highlighted:

1207.11.4 Energy Ratings Effective: 07-01-2024

Individual ESS units shall have a maximum rating of 20 kWh. The ratings of the ESS in each location shall not exceed the ratings in Table 1207.11.4. The total aggregate ratings of ESS on the property shall not exceed 600 kWh.

ESS installations exceeding the permitted individual or aggregate ratings shall be installed in accordance with Sections 1207.1 through 1207.9.



As seen highlighted in green, ESS exceeding the permitted individual (20 kWh) or aggregate ratings (600 kWh on the property) are required to be installed to meet Sections 1207.1 through 1207.9. Otherwise, section 1207.11 ESS in Group R-3 and R-4 Occupancies applies.

The SFFD LAFCo response letter seems to have conflated the ratings as intended for 1207.11 R-3 and R-4 Occupancies perhaps with TABLE 1207.1.1, which does not apply for R-3 or R-4 buildings.

I welcome the opportunity for further discussion on this matter, otherwise I hope the SFFD is amenable to accepting email electrical permits for R-3 or R-4 buildings with ESS meeting the size requirements of 1207.11.

Sincerely,

A handwritten signature in blue ink, appearing to be "August Goers".

August Goers
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Luminalt Energy Corporation