CAL FIRE - OFFICE OF THE STATE FIRE MARSHAL
Code Interpretation 26-07

Issued: November 4, 2026

Energy Storage Systems (ESS) Separations from Exterior Doors & Windows

OVERVIEW

Edition:	2025 Title 24 California Building Standards (January 1, 2026 Errata)
Code:	Part 9, California Fire Code (CFC) & Part 2.5 California Residential Code (CRC)
Section(s):	CFC 1207.11.3, Item 3 & CRC 330.4, Item 3
Requested By:	Lorena Soules, Chief Building Official, City of Redondo Beach Building Department
Date Received:	April 3, 2026

QUESTION #1

Is the 3-foot separation requirement of energy storage system (ESS) units installed outdoors or on the exterior side of exterior walls from doors and windows directly entering the dwelling in Group R-3 and R-4 occupancies applied only horizontally?

ANSWER #1

No. An ESS unit installed outdoors or on the exterior side of an exterior wall of a Group R-3 and R-4 occupancy must be located not less than 3 feet in all directions from doors and windows entering the dwelling unit.

Note: An ESS that is listed and labeled in accordance with UL 9540 and marked “Suitable for Use in Residential Habitable Spaces” is not subject to CFC 1207.11 and shall be installed in accordance with their listing. Additionally, an ESS rated an aggregate of less than 1 kWh is not subject to the requirements of CFC 1207 and an ESS installations exceeding the permitted individual or aggregate ratings of CFC 1207.11.4 shall comply with Sections 1207.1 through 1207.9.

QUESTION #2

Can the 3-foot separation requirement of ESS units installed outdoors or on the exterior side of exterior walls from doors and windows directly entering the dwelling in Group R-3 and R-4 occupancies be applied vertically or diagonally as well?

ANSWER #2

Yes. See response to Question 1.