



# CAL FIRE - OFFICE OF THE STATE FIRE MARSHAL

## Code Interpretation 24-03

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Issued: October 1, 2024

### ESS – Degradation vs. Maximum Aggregate

#### OVERVIEW

**Edition:** 2022 CCR Title 24, California Building Standards  
**Code:** Part 9 - California Fire Code (CFC), Part 3 - California Electrical Code (CEC)  
**Section(s):** (CFC) 1207.11.3-1207.11.5, (CEC) Article 706.  
**Requested By:** Jerry Thompson, Owner, Integrity Electric  
**Date Received:** February 01, 2024

#### QUESTION:

Can six Tesla Powerwall batteries (13.5 x 6 = 81kWh) be installed on the exterior wall of an R-3 single-family dwelling?

#### ANSWER:

No. CFC 1207.11.4 limits the maximum aggregate to 80kWh for exterior walls.

#### QUESTION:

Does the code provide provisions for degradation such that new equipment may be installed/added to compensate for the projected degradation of an existing system? (ie. 3 new Tesla Powerwall batteries and 3 existing (OLD) Tesla Powerwall aggregated rating is less than 80kWh due to degradation.)

#### ANSWER:

No. California Fire Code and California Electrical Code does not provide any provisions for degradation.