



CAL FIRE - OFFICE OF THE STATE FIRE MARSHAL

Code Interpretation 24-02

Issued: July 9, 2024

Electrical Energy Storage Systems (ESS) Listing and Rating

OVERVIEW

Code Section(s): California Fire Code (CFC) 1207.11.1 & 1207.11.4
Edition: 2022 California Fire Code
Requested By: Bryan Hamlin, HomeGrid subsidiary of Lithion
Date Received: October 23, 2023

QUESTION:

Does CFC 1207.11.1 require the company that performs testing and lists a product be the same company that develops the testing standards.

ANSWER:

No. CFC 1207.11.1 states that ESS shall be listed and labeled in accordance with UL 9540.

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.