



# CAL FIRE - OFFICE OF THE STATE FIRE MARSHAL

## Code Interpretation 26-06

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Issued: October 28, 2026

### Residential Energy Storage System (ESS) Fire Testing

#### OVERVIEW

**Edition:** 2025 Title 24 California Building Standards (January 1, 2026 Errata)  
**Code:** Part 9, California Fire Code (CFC)  
**Section(s):** CFC Section 1207.11.2.1 and 1207.1.7  
**Requested By:** Richard Kwok  
**Date Received:** April 3, 2026

#### QUESTION #1

Does the CFC apply to Group R-3 ESS installations in one- and two-family dwellings regulated by the California Residential Code (CRC)?

#### ANSWER #1

Yes. In accordance with CFC 1.1.3, the provisions of the CFC apply to all buildings or structures throughout the State of California. Additionally, in accordance with CFC 1.1.7.3, where any CFC requirement conflicts with any other part of Title 24, the most restrictive shall apply.

#### QUESTION #2

Is the large-scale fire testing of CFC 1207.1.7 required for Group R-3 ESS installations regardless of size?

#### ANSWER #2

No. Large-scale fire testing is not required for ESS rated less than 1 kWh, ESS UL 9540 listed and labeled "Suitable for Use In Residential Habitable Spaces", or ESS rated in accordance with CFC 1207.11.4 and spaced in accordance with CFC 1207.11.2.1.

#### QUESTION #3

Is the large-scale fire testing of CFC 1207.1.7 required for Group R-3 ESS installations that exceed the maximum quantities of Table 1207.11.4, but that do not exceed the maximum quantities of Table 1207.5?

#### ANSWER #3

Most likely yes, however, it does depend on the ESS installation size, separation, and fire suppression.

For Group R-3 occupancies, any ESS installation that exceeds the maximum individual or aggregate quantities in Table 1207.11.4 must comply with the provisions of CFC Sections 1207.1 through 1207.9.

**Note: The local AHJ may have more restrictive requirements adopted through a local ordinance.**