



CALIFORNIA STATE FIRE MARSHAL CODE INTERPRETATION

Date Issued	September 24, 2020	Interpretation	20-1
Topic	ESS requirements for an R-3		
Code Section(s)	2019 California Residential Code Section R327 2019 California Fire Code Section 1206		
Requested by	Vincent Jolissaint		
Date Received	January 8, 2020		

Question:

Which part of Title 24 California Code of Regulations Building Standards and code section appropriately controls the installation of at-home batteries within a Group R-3 (residential) occupancy structure?

Part 2.5 the California Residential Code (CRC) section 327 or part 9 the California Fire Code (CFC) section 608?

Response:

The International Code Council adopted the Energy Storage Systems (ESS) with the intent to have the residential energy storage systems that are listed with UL 9540 comply with the installation requirements of the Residential Code and the Electric Code. The limit of 20 kWh in the Residential Code was to allow the permitting requirements established in the Fire Code. The final adopted version was not clear on how the Fire Code requirements were met with the residential application.

This issue has been corrected in the 2021 International Fire Code and International Residential Building Code for Energy Storage Systems. The California Building Standards Commission (CBSC) have adopted these regulations in the 2019 Intervening Code Cycle. These regulations will become effective on July 1, 2021.

The local Authority Having Jurisdiction can, at their discretion, currently approve installations based on the regulations found in the 2019 Intervening Code Cycle, because they have been adopted by the CBSC. The regulations can be referenced at: [CBSC Rulemaking Aug 13 Meeting webpage](#).