

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Charles Picard
Date: Friday, October 15, 2021 1:11:48 PM

Commenter Contact Information

Name: Charles Picard
Date: 10/15/2021 12:00:00 AM
Representing: Tesla, Inc.
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Proposed Building Standard

Title 24 Part #: Part 9
Section #: 12, 1207.1.4
Proposing State Agency: SFM
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):
Approve

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

Tesla supports the adoption of the model code language without modification. FMEAs for established technologies are unnecessary as the safety of these installations are adequately covered by product safety standards. Additional scrutiny and planning is warranted when any of the (3) conditions in 1207.1.4 are met. This code language is clear and unambiguous, and Tesla has not experienced any confusion over the application of this section. This proposed language is a reasonable way to "future proof" the code and address installations that aren't otherwise covered.

9 Point Criteria Info:
18930(a) 6