

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Charles Picard
Date: Monday, October 18, 2021 12:27:30 PM

Commenter Contact Information

Name: Charles Picard
Date: 10/18/2021 12:00:00 AM
Representing: Tesla, Inc.
Mailing Address
Number and Street: 3500 Deer Creek Rd.
City: Palo Alto
State: California
Zip Code: 94022
Telephone #: 4012907970
Email: cpicard@tesla.com

Proposed Building Standard

Title 24 Part #: Part 9
Section #: Chapter 12, Table 1207.6
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 as proposed in the Initial Express Terms document. It should be noted that the ventilation requirements for specific BESS chemistries is related to normal operation, not under various failure modes or abuse cases. This section addresses "protection", not detection. Ventilation should only be required where the lack of it would result in a hazard. Detection of specific hazards or events, such as possible explosions due to the accumulation of cell vent gases, are already covered elsewhere (see 1206.6.3, also noted in this table) for each potential hazard. Additionally, the footnote "e" for Li-Ion chemistries does not imply an automatic exception for thermal runaway "detection". Again, this section relates to protection, and it is appropriate to allow a BMS to have this protection integrated into a listed BESS. Thermal runaway detection is required by 1207.6.5, but gas detection may not be the only means to achieve this.

9 Point Criteria Info:
18930(a) 1