

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 12:35:29 PM

Commenter Contact Information

Name: Charles Picard
Date: 10/18/2021 12:00:00 AM
Representing: Regulatory Compliance
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Proposed Building Standard

Title 24 Part #: Part 9
Section #: Chapter 12, Section 1207.6.1.2.4 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 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. For example 1207.6.1.1 is based on a "worst-case" charging scenario, but this is still within "normal" parameters because it is tied to maximum charge rate, not overcharging. 1207.6.5 already requires a listed device or other approved method to prevent, detect and minimize the impact of thermal runaway, gas detection is only one such method.

9 Point Criteria Info:
18930(a) 1