



# Memorandum of Policy

## Building Codes

**From:** Justin Hahn

**Date:** August 18, 2025

**Subject:** Installation of Energy Storage Systems

The installation of energy storage systems (ESS) shall comply with the currently adopted building and fire codes, as well as the most recent edition of NFPA 855, with the following amendments to NFPA 855:

1. 15.2.1 – ESS shall be listed and labeled in accordance with UL 9540. UL 9540a testing information shall be provided to the AHJ showing no fire propagation between modules during large scale fire testing if exceeding capacity or allowed locations of NFPA 855 or the currently adopted IFC.
2. 15.3.2 – A label containing emergency contact information for the qualified service and maintenance providers shall be provided on the exterior of the installed ESS. Signage per 4.7.4 shall be provided at the electrical disconnect and on the door into the space containing ESS for storage, utility, and crawlspace installations.
3. 15.4.1 (4) – In enclosed utility closets and storage or utility spaces not more than a single level below grade, where approved by the AHJ on a case by case basis for crawlspace installation. Crawlspace installations shall be enclosed with fire rated construction per 9.6.4.1 and provided with a minimum 3'x3' access panel in a vertical wall with the ESS located within 15' of the access pane.
4. **15.4.4** - ESS shall be prohibited from being installed in the same space as fire alarm panels and fire sprinkler risers.
5. 15.7.1 – Rooms and areas within dwelling units, basements, and attached garages in which ESS are installed shall be protected by interconnected heat and smoke alarms in accordance with building and fire code, and the specific devices listing. Heat detection devices shall be of the appropriate type to detect thermal run away for the specific system installed.