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To: DES SBCC <sbcc@des.wa.gov>

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In the IBC commentary for IBC section 909.11.1, “The intent of the ventilation is focused on the proper function of the standby power source in terms of engine-driven generators having appropriate cooling air and combustion air. The requirement that it be from the outside is related to the protection of such ventilation from the effects of fire.” Based on this statement, generator standby power would require ventilation, but another acceptable form of standby power is tap ahead of the main. The room for standby power using tap ahead of the main should not need to be ventilated. In the amendment, I would like to see a clear difference between the different types of standby power for the ventilation requirements.

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