STATE OF WASHINGTON

STATE BUILDING CODE COUNCIL

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STATE BUILDING CODE COUNCIL
PUBLIC HEARING RECORD

Hearing Date and Time: Wednesday, August 30, 2023, 10:00 a.m.

Council Members in Attendance: Micah Chappell, Tom Handy

Staff in Attendance: Stoyan Bumbalov, Managing Director; Dustin Curb; Kris Irelan; Rozanna Ghanie; Annette Haworth

Others in Attendance: Ric Blu, Ken Brouillette, Quinton Harrington, Nora Hawkins, Ty Jennings, Jonathan Jones, Scott Lang, Jon Napier, Chris Pfaff, Emily Ramos, Savy Robinson, Todd Short, Jimmy Stewart, Ted Vanegas, Deanah Watson, Jack Wellman

Chapter 51-54A; Amendments to the 2021 International Fire Code to adopt provisions of the 2024 International Fire Code into the 2021 Code.	**Due to rapidly evolving technologies within the field of Energy Storage Systems, these changes are necessary to address applications that are encountered in the field but not addressed withing Chapter 12 of the International Fire Code. Reference to NFPA 855 is appropriate, as there are items in Chapter 12 that are not fully covered in NFPA 855. By combining the use of both documents, maximum safety can be obtained. In addition, the code user will benefit from the annex note explanations in NFPA 855.**
From:	**Testimony**
Ken Brouillette	I am with the Seattle Fire Department. In the past few years energy storage systems have gained global attention as a key enabling technology to facility to shift to renewable energy sources. Energy storage system (ESS) play a critical role in the transition allowing for variety of functions that provide much needed support to the aging electrical grid as well as providing the ability to store abundant renewable energy. ESS's are not necessarily known as a stable technology though. The term ESS calculates a tremendous range of technologies from flywheels to flow batteries and most of these will be unfamiliar to building officials, emergency service providers, planning departments, architects, engineers and also fire departments. The 2018 International Fire Code started to address these systems with a new chapter, 12 titled Energy Systems, but it fell short with addressing some of the fast-moving technology and many jurisdictions were looking for other standards or regulations that would assist them with providing guidance when these systems entered their jurisdictions. The IFC does reference other standards procedures and they can be used to assist the AHJ (Authorities Having Jurisdiction). The National Fire Protection Association did create NFPA 855, which is the standard for the installation of stationary Energy

	Storage Systems. The standard was not referenced in the 2018 code and therefore at the time I had requested an Emergency Rule Change to the scoping section in Chapter 12 that indicated Energy Storage System shall comply with NFPA 855. The State Building Code Council did approve the Emergency Rule to reference NFPA 855 and the rule referenced the latest published document, which is the 2023 edition of NFP 855. The 2021 IFC did make major strides with updates to establishing criteria on commissioning, decommissioning, testing, and maintenance requirements. Unfortunately, NFPA 855, the 2023 edition had not been published during the development of the 2021 IFC. Therefore, many important items were left out. While the Fire Code TAG was working on development of the 2021 IFC, many items were brought forward for change that corrected items in the 2021 edition of the IFC for the 2024 IFC. The 2024 IFC correlated items that had been developed in NFPA 855, the 2023 edition which is what is being presented today for the Off Cycle Rule making. This includes an additional correlation between the 2021 International Residential Code and International Fire Code which was lacking in the 2021 IFC and could have caused confusion. During the review process through the Fire Code TAG and the BFP Committee, I presented all the 2024 IFC code change proposals that were approved for reference and reasoning. Some minor changes to the CR-102 document presented, needed to be addressed and that's on page 9, following the section 1207.11.10 all the language after NFP 70 needs to be removed. It appears that was actually added onto the document for reference standards that are shown on page 10. No, they are fine to stay but I think there was crossover. I would like to address Scott Lang's written testimony from Honeywell International regarding the 2024 IFC changes in Chapter 11 that require any existing systems that were installed prior to the 2018 or 2021 IFC need to provide a Hazard Mitigation Analysis. I did not propose during the Off Cycle Rule process. But as he points out, this requirement is in the 2023 edition of the NFP 855 and therefore the AHJ could still use that reference standard to utilize this requirement without bringing forward the 2024 edition of Chapter 11. I thank you Dustin for your time and look forward to seeing the Off Cycle Rule more forward.
	The hearing was paused at 10:11 a.m. to wait for any additional comment.
Adjourn	The Hearing was adjourned at 12:00 p.m.