SC#25-8-8-a-1
D#25-10

Dawn Michele Bellis
Secretary, Standards Council

4 September 2025*

To: Interested Parties

Subject:

Standards Council Decision (Final):	**D#25-10**
Standards Council Agenda Item:	**SC#25-8-8-a-1**
Date of Decision:	20 August 2025
NFPA 855, *Standard for the Installation of Stationary Energy Storage Systems*, 2026 Edition	

Dear Interested Parties:

At its meeting of August 18-20, 2025, the Standards Council considered an appeal on the above referenced matter. The Council's Final decision is now available and is attached herewith.

Sincerely,

Dawn Michele Bellis
Secretary, NFPA Standards Council

cc: S. Gallagher, D. McGonagle, C. Duffy, C. Coache
Members, TC on Energy Storage Systems (ESS-AAA)
Members, NFPA Standards Council (AAD-AAA)
Individuals Providing Appeal Commentary

*NOTE: Participants in NFPA's standards development process should know that limited review of this decision may be sought from the NFPA Board of Directors. For the rules describing the available review and the method for petitioning the Board for review, please consult section 1-7 of the Regulations Governing the Development of NFPA Standards and the NFPA Regulations Governing Petitions to the Board of Directors from Decisions of the Standards Council (see www.nfpa.org/regs). Notice of the intent to file such a petition must be submitted to the Clerk of the Board of Directors within 15 calendar days of the publication date of this Decision.

Standards Council Decision (Final):	**D#25-10**
Standards Council Agenda Item:	**SC#25-8-8-a-1**
Date of Decision:	20 August 2025
NFPA 855, *Standard for the Installation of Stationary Energy Storage Systems*, 2026 Edition	

SUMMARY OF ACTION (for convenience only; not part of official decision): The Standards Council voted to deny the appeal seeking to overturn the results of the NFPA eligible voting membership at the 2025 Technical Session on CAM 855-12 and thereby Reject Second Revision No. 20.

DECISION:
At its meeting of August 18-20, 2025, the Standards Council considered an appeal from William Koffel, Koffel Associates, Inc. representing the California Solar and Storage Association (CALSSA). The appeal requests that the Standards Council overturn the results of the NFPA Membership at the 2025 Technical Session on CAM 855-12 for the 2026 Edition of NFPA 855, *Standard for the Installation of Stationary Energy Storage Systems*. Specifically, the appeal requests to revise paragraph 15.13.1 and A.15.13.1 by rejecting Second Revision No. 20.

As background, the responsible technical committee created Second Revision No. 20 in response to three Public Comments (namely PC 95, PC 268, and PC 313). The revision was proposed to address large scale fire testing of residential energy storage systems (ESS) and to create guidance for the same. A Notice of Intent to Make a Motion ("NITMAM") was filed by William Koffel, Koffel Associates, Inc. to Reject Second Revision No. 20 and was certified by the Motions Committee, then presented for debate during the NFPA Technical Meeting as CAM 855-12. CAM 855-12 failed to achieve simple majority support of the membership during the NFPA Technical Meeting. Mr. Koffel, representing CALSSA, filed an appeal with the Council based upon the unsuccessful result of CAM 855-12. Therefore, the result yielded by the NFPA standards development process is to issue NFPA 855 with Second Revision No. 20 as recommended by the technical committee.

The text subject to the appeal of CAM 855-12 did not gain sufficient support within the standards development process for inclusion in the 2026 edition of NFPA 855, *Standard for the Installation of Stationary Energy Storage Systems*. The appeal requests that the Council overturn the results yielded by the standards development process. On appeal, the Council accords great respect and deference to the NFPA standards development process. In conducting its review, the Council will overturn the results of that process only where a clear and substantial basis for doing so is demonstrated.

Although the Appellant alleged that the text at issue proposing large scale testing for residential ESS is "new material" and the Chair of the Committee testified that he had left that determination to the technical committee, the Council was unpersuaded that the subject matter of large scale testing of energy storage systems—including residential units—had not had the benefit of prior public, stakeholder, and technical committee review. Tentative Interim Amendment (TIA) No. 23-1 (i.e. TIA Log #1727 and Standards Council Agenda item 23-8-64), issued on the 2023 edition of NFPA 855, added fire and explosion testing and reporting in Chapter 15, which pertains to residential ESS. In accordance with the *Regulations Governing the Development of NFPA Standards,* this TIA was subsequently entered as a Public Input (specifically, PI No. 30) for the 2026 edition's revision cycle, and the technical committee reaffirmed acceptance in First Revision No. 102. In addition, Public Input Nos. 28 and 29 describe a task group formed

by the technical committee to evaluate spacing and engineering requirements for fire and explosion testing in both chapters 9 and 15. In the view of the Council, the record provided sufficient evidence of large-scale fire testing being discussed across the various installations within the scope of NFPA 855 to uphold the decision of the committee to create a second revision.

The Council has reviewed the entire record concerning this matter and has considered all the arguments put forth in this appeal. In the view of the Council, this appeal does not present any clear and substantial basis upon which to overturn the results yielded by the NFPA standards development process. Accordingly, the Council has voted to deny the appeal. The effect of this action is that NFPA 855, *Standard for the Installation of Energy Storage Systems*, will include the text in 15.13.1 and A.15.13.1 as recommended and approved by the technical committee as Second Revision No. 20.

The Council notes, however, that there was significant discussion regarding whether testing requirements for residential ESS are clearly articulated or defined in Section 15.13.1 and the related Annex text. Given this lack of clarity, the Council requests that a Task Group of balanced interests be formed to address this issue and to report back to the Council no later than the April 2026 Council meeting and, if warranted, process a TIA to provide clarity regarding the testing of residential ESS.

Council Member Dwayne Sloan recused himself from the deliberations and vote on the appeal.

Council Member Raymond Grill was not in attendance during the deliberations and vote on this appeal.