



April 1, 2025

Dear Senator Government Operations Committee:

I am writing in response to the March 21st testimony to the Senate Government Operations Committee by representatives of the Vermont Firefighters Association requesting additional notification requirements on sites where energy storage systems (ESS) are located.

The safety of first responders working on sites where ESS are located is of great importance to REV members but it is unclear from the testimony what new requirements are being requested.

ESS installers are currently supposed to include hazard labels indicating the presence of ESS onsite and indication of location of the ESS disconnect. In addition, installers already include ESS disconnect labelling as part of already adopted code (NFPA 70 706.15).

REV has serious concerns about the potential requirement of Department of Fire Safety (DFS) permits for all ESS projects given that DFS is under resourced and ESS installers already face scheduling challenges for the projects solar installers currently need to get State permits for. Additional DFS permit requirements would also be an additional cost in the form of permit fees and an additional electrician for the inspection as well as potential delays in energizing

REV is also concerned about the potential adoption of a statewide ESS-specific fire code (NFPA 855) which would require building fire-resistant rooms wherever ESS is installed in a dwelling unit and requiring the whole home's smoke alarm system be brought up to code as well. This would be quite burdensome for homeowners-costing customers at minimum \$2500 per fire closet and \$600-1000 for smoke detector upgrades.

Many thanks for considering these concerns as you discuss this issue.

Sincerely,

A handwritten signature in cursive script that reads "Peter Sterling".

Peter Sterling, Executive Director
Renewable Energy Vermont