

March 4, 2019  
Contractors State License Board  
9821 Business Park Drive  
Sacramento, CA 95827

**RE: Clarification of Regulations for Battery Energy Storage System Installation**

Thank you for your continued efforts to protect California consumers by ensuring the construction industry adheres to policies that promote the health, safety and general welfare of the public. We are appreciative of the thorough review the Board has taken in recent months and are writing to **urge the Board to clarify current regulations to require that only specialty contractors holding a C-10 electrical contractors license may install battery energy storage systems.**

The use of battery energy storage systems is rapidly expanding in hospitals, schools, businesses and homes throughout the state. This technology is key in helping California meet its clean energy and emissions reduction goals and to expand the adoption of solar, wind and other clean energy sources. However, if not installed and maintained correctly by highly-qualified and licensed C-10 electrical contractors, battery energy storage systems pose unique fire, electrical and public safety risks to installers, consumers, utility workers and emergency personnel.

Ambiguity in the regulations has allowed C-46 solar contractor licensees to install battery energy storage systems when paired with a solar photovoltaic (PV) system, even though these battery energy storage systems are separate electrical systems and the C-46 solar contractors do not have the electrical training or expertise required.

A PV energy system is very different technology than a battery energy storage system. A battery **transforms** electrical energy to chemical energy and back into electricity. For that reason, CSLB regulations specifically require a C-10 license to *“install, erect or connect any electrical wires, fixtures, appliances, raceways, conduits, solar photovoltaic cells or any part thereof, which generate, transmit, transform or utilize electrical energy in any form or for any purpose.”*

C-10 licensed electrical contractors have an extensive background in electrical theory and, by law, are required to install battery energy storage systems with highly trained electricians who have been certified by the state. In contrast, C-46 licensed solar contractors are not specifically qualified to safely install this complex technology and their installing employees have no training nor certification requirements.

**We are urging the Board to not compromise safety standards by continuing to allow a C-46 solar contractor to install a battery energy storage system.** CSLB regulations specifically prohibit C-46 solar contractors from installing standalone battery energy storage systems.

Please adhere to the mission of the CSLB and protect public safety and consumers by ensuring battery energy storage systems are installed by only contractors who hold a valid C-10 electrical contractors license.

Sincerely,