Appendix V

FIRE MANAGEMENT AND PREVENTION PLAN

FIRE MANAGEMENT AND PREVENTION PLAN

Easley Renewable Energy Project

Prepared for

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IP Easley II, LLC, &
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1. INTRODUCTION

The objective of the Fire Management and Prevention Plan (Fire Plan) is to provide safe procedural practices, environmental protection measures, and other specific stipulations and methods to prevent and respond to fires during construction and operation of the Easley Renewable Energy Project (Project).

This Fire Plan identifies measures to minimize fire risk during construction and operational activities associated with the solar facility, gen-tie line, and associated components. It will be the responsibility of the Proponent and its Project contractors, working with designated environmental inspectors, to comply with measures identified in this Fire Plan. The BLM is responsible for responding to wildfires located within BLM Direct Protection Areas in conjunction with the Riverside County Fire Department (RCFD) and California Department of Forestry and Fire Protection (CAL FIRE) as applicable, for the Project. IP Easley I, LLC, IP Easley II, LLC, and IP Easley III, LLC (or the Project operator at the time), the Engineering, Procurement, and Construction (EPC) Contractor, and all personnel working at the Project site are advised to stay in touch with local fire dispatch offices via the E-911 system to be of service and for personal safety.

1.1. Regulatory Requirements

The proposed Project is located entirely within an area designated as Federal Responsibility Area (FRA), with some adjacent areas of Local Responsibility Area (LRA) (CAL FIRE, 2007; County of Riverside, 2019). Agencies that are likely to provide wildfire protection to the Project would be RCFD and BLM Fire and Aviation Program. Because the Project is not located in a State Responsibility Area, CAL FIRE would not have primary responsibility for fire management or suppression activities in this area. While individual fire agencies have primary responsibility for specific geographic areas, under interagency cooperative and mutual aid agreements, fire agencies throughout the region aid each other as needed. According to the CAL FIRE Fire Hazard Severity Zones (FHSZ) Map and County of Riverside General Plan Safety Element the Project would be in an area of Moderate FHSZ (CAL FIRE, 2020; County of Riverside, 2019). There is limited potential for wildfire on the site due to sparse vegetation. The Project is located adjacent to the Lake Tamarisk Community, which is within a Local Responsibility Area.

The Riverside County Fire Department Technical Policy TP-15-002, titled Solar Energy Generating System (SEGS) Fire Apparatus Access Roads, is a standard that was developed to assist with the design of fire apparatus access roads from public roadways to a SEGS (i.e., solar facility). It addresses secondary access road requirements, which shall be determined by the County Fire Marshal given the specific conditions of any given solar project (Riverside County Fire Department, 2020). Each SEGS project will be reviewed on a case-by-case basis to determine secondary fire apparatus access requirements to facilitate emergency operations and to minimize the possibility of an access point being subject to congestion or obstruction during an emergency incident. This standard states that the secondary access road shall not be less than 20 feet in width and shall have an unobstructed vertical clearance of no less than 13 feet, 6 inches. The grade of the access road shall not exceed 15 percent. The access road shall be designed, constructed, and maintained to support the imposed load of fire apparatus weighing at least 75,000 pounds and constructed to Riverside County Transportation Standards. A registered engineer shall certify the design and construction of the access road based on the fire apparatus-imposed load of 75,000 pounds.

1.2. Mitigation Measures

This Fire Plan has been prepared to proactively address potential impacts to wildland fire that may result from the Project to help prevent fire-related loss of life, property, and resource damage and to manage fire risk during construction. Fire management and prevention will also be addressed in future mitigation measures that will be incorporated in all Project engineering, procurement, and construction contract(s)

that will reference or clearly state any fire prevention requirements. Based on approved solar projects in the Desert Center area, these measures should include:

- Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, and hot work restrictions.
- Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days.
- All internal combustion engines used at the Project site shall be equipped with spark arrestors. Spark arrestors shall be in good working order.
- Once initial two-track roads have been cut and initial fencing completed, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Mufflers on all cars and light trucks shall be maintained in good working order.
- Fire rules shall be posted on the Project bulletin board at the contractor's field office and areas visible to employees.
- Equipment parking areas and small stationary engine sites shall be cleared of all flammable materials.
- Smoking shall be prohibited in all vegetated areas and within 50 feet of combustible materials storage, and shall be limited to paved areas or areas cleared of all vegetation.
- Each construction site (if construction occurs simultaneously at various locations) shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.
- The Project owner shall coordinate with the BLM and RCFD to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the Project site, including incidents such as fire or explosion at or with the battery energy storage system (BESS).
- The plan shall include information about the type of BESS technology on site, potential hazards, and procedures for disconnecting or shutting down the BESS in case of fire or to reduce the chance of fire (see Attachment B, Tesla Megapack 2 XL Fire Protection Engineering & UL 9540A Interpretation Report).
- All construction workers, plant personnel, and maintenance workers visiting the plant and/or transmission lines to perform maintenance activities shall receive training on fire prevention procedures, the proper use of fire-fighting equipment, and procedures to be followed in the event of a fire. Training records shall be maintained and be available for review by the BLM and RCFD. Fire prevention procedures shall be included in the Project's Worker Environmental Awareness Program (WEAP).
- Vegetation near all solar panel arrays, ancillary equipment, and access roads shall be controlled through periodic cutting and spraying of weeds, in accordance with the Weed Management Plan.
- The BLM and RCFD shall be consulted during plan preparation and fire safety measures recommended by these agencies included in the plan.
- The plan shall list fire prevention procedures and specific emergency response and evacuation measures that would be required to be followed during emergency situations.
- All on-site employees shall participate in annual fire prevention and response training exercises with the BLM and RCFD.
- The plan shall list all applicable wildland fire management plans and policies established by state and local agencies and demonstrate how the Project will comply with these requirements.
- The Project owner shall designate an emergency services coordinator from among the full-time on-site employees who shall perform routine patrols of the site during the fire season equipped with a portable

fire extinguisher and communications equipment. The Project owner shall notify the BLM and RCFD of the name and contact information of the current emergency services coordinator in the event of any change.

- Remote monitoring of all major electrical equipment (transformers and inverters) will screen for unusual operating conditions. Higher than nominal temperatures, for example, can be compared with other operational factors to indicate the potential for overheating which under certain conditions could precipitate a fire. Units could then be shut down or generation curtailed remotely until corrective actions are taken.
- Fires ignited on site shall be immediately reported to BLM and the RCFD.
- The engineering, procurement, and construction contract(s) for the Project shall provide reference to or clearly state the requirements of this mitigation measure.
- The Project owner must provide the Fire management and Prevention Plan to the BLM for review and approval and to the Riverside County Fire Department (RCFD) for review and comment before construction.

2. REGIONAL SETTING AND PROJECT DESCRIPTION

2.1. Regional Setting

The Easley Renewable Energy Project is located on private and BLM-administered land in Riverside County, north of I-10 and approximately 2 miles north of the town of Desert Center, California. A generation-tie (gen-tie) line would mainly traverse across the Oberon Renewable Energy Project site and connect into an approved substation that is under construction on the approved Oberon Project site. From the Oberon Substation, energy generated by the Easley Project would be transmitted to the SCE Red Bluff Substation on the existing, approved Oberon 500 kV gen-tie line. The Project site is located on four 7.5 Minute U.S. Geological Survey topographic quadrangles: East of Victory Pass, Victory Pass, Corn Springs, and Desert Center.

The public lands within the Project solar application area are designated as Development Focus Area (DFA) by the Desert Renewable Energy Conservation Plan (DRECP) and associated Record of Decision (ROD), and thus, have been targeted for renewable energy development. Because the proposed Project is partially located on federal land under management of the U.S. Bureau of Land Management (BLM), the

The Project site is relatively flat. Vegetation communities at the Project site are generally limited to scattered creosote brush scrub and desert dry wash woodland. Land uses near the Project include active and fallow agriculture, the community of Lake Tamarisk, scattered residences, renewable energy, energy transmission, historical military operations, and recreational development and use. Several solar and energy storage facilities exist, are under construction, or are proposed in the vicinity of the Easley Project. Solar projects that are under construction nearby include the Oberon Renewable Energy Project to the southeast and the Arica and Victory Pass Solar Projects to the southeast.

The Riverside County General Plan Safety Element identifies areas with rugged topography and flammable vegetation as being susceptible to fire hazards. According to CAL FIRE, the Project is not located within any FHSZ due to the lack of dense flammable vegetation and steep slopes (CAL FIRE, 2020). According to the Wildfire Susceptibility Map in the Riverside County General Plan Safety Element, very high FHSZs in Local, State, and Federal Responsibility Areas are concentrated in the western portions of Riverside County (County of Riverside, 2019). The Project would be located in Moderate FHSZ in Local and Federal Responsibility Areas. Since the Project is not located in a State Responsibility Area, CAL FIRE would not be

responsible for fire management or suppression activities in this area. This responsibility falls to BLM, although agencies cooperate in fire incident responses. Agencies that are likely to provide wildfire protection to the Project would be the Riverside County Fire Department and BLM Fire and Aviation Program.

2.2. Project Description

IP Easley I, LLC, IP Easley II, LLC, and IP Easley III, LLC (Applicant or Proponent), subsidiaries of Intersect Power, LLC, propose to construct, operate and decommission the Easley Renewable Energy Project (Easley or Project), a utility-scale solar photovoltaic (PV) electrical generating and storage facility, and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid.

The proposed Project application area is located on approximately 3,735 acres of private and BLM-administered land, in Riverside County north of Desert Center, California. The Project would generate up to 400 megawatts (MW) and store up to 650 MW of renewable electricity via arrays of solar photovoltaic (PV) panels, battery energy storage system (BESS), and appurtenant facilities. A 6.7-mile 500 kilovolt (kV) generation-tie (gen-tie) line would mainly traverse across the Easley Project site and connect into an approved substation that is under construction on the approved Oberon Renewable Energy Project site, an adjacent solar and energy storage facility owned by Intersect Power. From the Oberon onsite substation, the power generated by the Easley Project would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie line, which is expected to be online by the end of 2023.

An Operation and Maintenance (O&M) building will be constructed at the Project site. The building will be designed for Project security, employee offices, and parts storage. The approximately 3,000 square-foot O&M building will be approximately 15 feet at its tallest point. The building will be constructed on a concrete foundation with its exterior color to be determined in coordination with the BLM. Electrical power for the O&M building and substation will be supplied via a new overhead or underground 12 kV distribution line extending from the existing SCE distribution system adjacent to the solar facility site.

Construction would occur over approximately 24 months. The Project would operate for a minimum of 35 years and up to 50 or more years. At the end of the Project's useful life, the Project would be decommissioned and the land returned to its pre-Project conditions.

3. METHODS

3.1. Fire Prevention and Risk Reduction Responsibilities

Implementation of the Fire Plan is the responsibility of all facility employees and contractors, in cooperation with BLM and RCFD. This plan is subject to revision if there is a change of ownership, a natural disaster, and/or construction or decommissioning activities that have the potential to alter site conditions in ways that affect fire risk and fire management.

All Project employees and contractors are required to demonstrate knowledge of the elements of the Fire Plan and to carry out responsibilities as outlined below.

Emergency Services Coordinator

Emergency Services Coordinator will be responsible for the following safety measures:

- Be in charge of overseeing the Fire Plan implementation

- Train assigned employees in the safe storage, use and handling of flammable materials, the use of firefighting equipment to fight incipient-stage fires, and the requirements of this fire plan
- Ensure that flammable material storage areas are properly maintained
- Ensure that fire control equipment and systems are properly maintained
- Manage fire fuel source hazards
- Perform routine patrols of the site during fire season equipped with a portable fire extinguisher and communications equipment
- Monitor fire weather conditions (red flag days and other fire danger designations) and restrict activities during such conditions
- Maintain contacts with area fire agencies. The BLM and RCFD will be notified of the name and contact information of the current emergency services coordinator in the event of any change.
- Ensure that appropriate training for all employees and regular site contractors is implemented annually to ensure all personnel are adequately prepared in the event of an emergency, and document that training has occurred. (See Appendix A for Fire Plan Training Log).

Employees and Contractors

Employees and contractors will be responsible for the following safety measures:

- Complete all required training
- Conduct construction activities safely to limit the risk of fire
- Report potential fire hazards to their supervisors
- Follow fire emergency procedures

4. CONSTRUCTION ACTIVITIES

4.1. Fire Hazard Control

During construction, fires could be caused by a variety of factors, including vehicle exhaust, sparks associated with grading activities, welding activities, parking on dry vegetation, and the overall temporary increase in human activity. Accidental ignition could result in a fire, which, depending on the location, could spread. The consequences of a such a fire could be severe depending on weather conditions at the time and the ability of on-site firefighting personnel to quickly respond to the fire.

Pursuant to the Code of Federal Regulations, Title 29, Part 1926.24 (29 Code of Federal Regulations [CFR] 1926.24), the Project operator would be responsible for the development and maintenance of an effective fire protection and prevention program through all phases of construction, repair, alteration, or demolition work for the solar facility, BESS, Project substation, gen-tie line, and associated components. The Project operator would ensure the availability of the fire protection and suppression equipment required by this regulation.

Fire protection and suppression equipment during construction and operations will include water trucks with hoses, fire extinguishers, and shovels.

In addition, the Project owner and/or EPC contractor would present basic fire-prevention training to all personnel working at the Project site, maintain documentation of all training, and implement the following:

- All employees, contractors, and employees of contractors will do everything reasonable within their power, expertise, and assessment of human safety, both independently and upon request of the BLM and RCFD, to prevent and suppress fires resulting from construction or maintenance activities of the Project. If the Project operator suppresses fire, the operator will report its occurrence to BLM and RCFD. The operator is responsible for all suppression costs and resource damage rehabilitation costs resulting from the suppression of any fire resulting from its operations and practices.
- The operator must ensure that each employee, subcontractor, or any other individual or company working on the Project site is aware of the provisions of this fire plan, is familiar with the location and proper use of firefighting equipment and conducts themselves in a fire-safe manner.
- Vegetation will be removed prior to construction to minimize fire risk. Measures to minimize fire risk will include removal of dry vegetation and/or other combustible materials within 30 feet of any hazardous material storage, compressed gas storage, or equipment/vehicle that has the potential to spark a fire.
- All electric inverters and the transformer would be constructed on concrete foundation structures or steel skids and tested prior to use to ensure safe operations and avoid fire risks.

4.2. Red Flag Warnings and Very High or Extreme Fire Danger Days

A Red Flag Warning is issued for weather events which may result in extreme fire behavior within 24 hours. Upon issuance of a Red Flag Warning, the Emergency Service Coordinator will coordinate with BLM to determine if any Project activities are allowed to continue under these conditions.

CAL FIRE assists Local and State Responsibility Area agencies by notifying utility companies on Very High and Extreme fire danger days. These days may or may not coincide with the Red Flag Warning days. A communications link will be established between the CAL FIRE and Riverside County Unit Command Centers and the Project for these notifications. During Very High and Extreme fire danger days, local weather parameters reach the 90th percentile of fire danger, identifying the areas as severe fire hazards.

If either a Red Flag Warning and/or Very High or Extreme fire danger days are issued for the Project area, construction activities will be limited to work in areas previously cleared of vegetation. No welding is allowed to occur during these conditions without authorization from BLM and RCFD.

4.3. Welding and Cutting

Welding operations are subject to the following provisions:

- No welding can occur when winds are over 15 miles per hour, and
- Welding will occur only in areas cleared of all flammable vegetation and materials at a minimum radius of 30 feet from the welding operation.
- A fire-patrol person/fire watch will be designated to observe and monitor the area for potential fire ignition during and for at least 1 hour after welding is completed.
- Welding rigs will be equipped with a minimum of one 20 pound or two 10-pound fire extinguishers, and a minimum of 5 gallons of water in a pressurized water tank.

Appropriate hot work permits/approvals (for activities such as welding and metal cutting) will be obtained from the jurisdictional fire agency, Riverside County/CAL FIRE.

4.4. Equipment Operation and Storage

All internal combustion construction equipment and construction vehicles will be equipped with an acceptable muffler and effective spark arresters in proper working order. All equipment and work vehicles will be required to carry shovels (size "O" or larger and not less than 46 inches in overall length) and one 5-pound ABC fire extinguisher.

Construction staging areas, worker parking areas, and access roads will be designated and cleared of vegetation. No parking or construction activities will be allowed in non-designated areas. Vehicle idling will be limited.

4.5. Storage, Use, and Handling of Oils, Flammable Liquids, Hazardous Materials, and Vehicle Fuels

Fuels, and flammable materials, if required, will be in accordance with all applicable state and federal laws. Refer to the Hazardous Materials Management Plan, which established standard procedures for reporting, handling, disposal, and cleanup of hazardous material spills and releases.

4.6. Smoking and Fire Rules

Smoking shall be prohibited in all vegetated areas and within 50-feet of combustible materials storage and limited to paved areas or areas cleared of all vegetation.

Fire rules will be posted on the Project bulletin board at the contractor's field office and areas visible to employees. All construction workers, plant personnel, and maintenance workers visiting the transmission lines to perform maintenance activities will receive training on the procedures to be followed in the event of a fire. Training records will be maintained and available for review by the BLM and RCFD.

4.7. Firefighting Equipment

4.7.1. Fire Extinguishers

A portable fire extinguisher is very effective when used for combating incipient-stage fires. The use of a fire extinguisher that matches the class of fire and is operated by a person who is well trained can save both lives and property. Locations of portable fire extinguishers (5-pound Class A-B-C at minimum) will be placed at, but not limited to, each construction site (if construction occurs simultaneously at various locations), office spaces, hot work areas, flammable storage areas, and mobile equipment such as work trucks or other vehicles. All fire-fighting equipment will be marked conspicuously and be accessible.

It is the responsibility of the Environmental Service Coordinator to oversee the inspection, maintenance, and testing of fire extinguishers to ensure that they are in proper working condition and maintained in accordance with local and federal Occupational Safety and Health Administration (OSHA) requirements and have not been tampered with or physically damaged.

4.7.2. Water

The contractor shall furnish water trucks with hoses. The trucks may serve a dual purpose. The truck may be used to spray water on roads and work areas to suppress dust per Fugitive Dust Control Plan requirements.

5. OPERATIONS, MAINTENANCE AND DECOMMISSIONING ACTIVITIES

5.1. Fire Prevention and Risk Reduction Responsibilities

Solar arrays and PV modules are fire-resistant, as they are constructed largely of steel, glass, aluminum, or components housed within steel enclosures. As the tops and sides of the panels are constructed from glass and aluminum, PV modules are not vulnerable to ignition from firebrands from wildland fires. In a wildfire situation, the panels would be rotated and stowed in a panel-up position. The rotation of the tracker rows would be controlled remotely via a wireless local area network. All trackers could be rotated simultaneously in a hazard situation. Fire safety and suppression measures, such as smoke detectors and extinguishers, will be installed and available at the O&M facility. In addition, the operator will implement the following during operations, maintenance, and decommissioning:

- Train all workers to prevent fires and to respond quickly and effectively if an incident occurs.
- Inspect and maintain a fire extinguisher and any other BLM-required fire prevention equipment in each vehicle.
- Prohibit smoking outside of designated smoking areas.
- Perform "hot work" (i.e., welding or working with an open flame or other ignition sources) in controlled areas. Hot work areas will be wetted down as necessary before hot work is performed. At a minimum, a one-hour fire watch will be required after hot work is completed.
- Welding, cutting, grinding, or other flame- or spark- producing operations near the turbines should be minimized and, if required, closely supervised, with fire extinguishing equipment at hand.
- Remote monitoring of all major electrical equipment (transformers and inverters) will be used to screen for unusual operating conditions. Higher than nominal temperatures, for example, can be compared with other operational factors to indicate the potential for overheating which under certain conditions could precipitate a fire. Units could then be shut down or generation curtailed remotely until corrective actions are taken.
- On-site vegetation near all solar arrays, ancillary equipment, and access roads shall be trimmed approximately once every three years, as needed. For the first year, weed management and control would be performed quarterly. For the next two to four years, weed control would be performed annually in compliance with the BLM-approved Integrated Weed Management Plan.
- Schedule maintenance activities outside of the fire season, when possible, to minimize activity during high fire risk days.
- During Red Flag Warning events, as issued daily by the National Weather Service, cease nonessential activities. To mitigate fire risk, weather conditions will be monitored on site and operations and activities will be adjusted based on those conditions. Fire danger potential can be monitored using the following hyperlinked websites:

  CAL FIRE Red Flag Warnings and Fire Weather Watches
  http://www.fire.ca.gov/communications/communications_firesafety_redflagwarning.php

  National Weather Service Fire Weather Hazards
  http://www.nws.noaa.gov/largemap.php

  National 7-day Significant Fire Potential Outlook, California – South Area (Lower Deserts, SC12)
  http://psgeodata.fs.fed.us/7day/action/forecast/8

Southern California Fire Weather Planning Forecast (National Weather Service Zone 261) http://www.wrh.noaa.gov/firewx/cafw/display_cafwfzone.php?sid=sgx&zone=261

- A Hazardous Materials Management Plan, which establishes standard procedures for reporting, handling, disposal, and cleanup of hazardous material spills and releases, is in place.
- Keep equipment in good working order (i.e., inspect electrical wiring and appliances regularly and keep motors and tools free of dust and grease).
- Ensure that all exit or evacuation routes are free of obstructions.
- Prohibit non-essential heavy equipment operations for road maintenance during Red Flag Warning events.
- Turn off idling vehicles.
- Do not park over dry vegetation and inspect under parked vehicles before moving them to ensure desert tortoises are not present.

5.2. Battery Energy Storage System

Battery energy storage systems (BESS) can assist grid operators in more effectively integrating intermittent renewable resources, such as PV solar generation, into the statewide grid. The Project will include an AC-coupled battery or other similar storage system capable of storing up to 650 MW of power for 4 hours. The proposed BESS area (up to 35 acres) would be cleared and graded, as the storage facility must be nearly level. Site preparation activities also would include construction of drainage components to capture and direct stormwater flow around the BESS facility. Once the concrete foundations are in place for the BESS, the batteries, inverters, and other electrical equipment would be mounted and installed. Equipment would be delivered to the site on trucks.

The Project could use any commercially available battery technology, including but not limited to lithium ion, zinc, lead acid, vanadium, sodium sulfur, and sodium or nickel hydride. Battery systems would require air conditioners or heat exchangers and inverters. Currently the Applicant is anticipating use of the Tesla Megapack 2 XL (MP2XL) BESS system. Attachment B is a fire protection engineering analysis of the Tesla MP2XL, which reviews the MP2XL, its construction, design, and fire safety features, and includes an analysis of the UL 9540A cell, module, and unit-level test data.

The BESS will be designed, constructed, operated, and maintained in accordance with applicable industry best practices, regulatory requirements, and with the current California Fire Code (CFC), which governs the code requirements to minimize the risk of fire and life safety hazards specific to battery energy storage systems used for load shedding, load sharing, and other grid services (Chapter 12, Section 1206, of the 2019 CFC). In accordance with the CFC, the battery enclosure and the site installation design are all required to be signed off by the State Fire Marshal. The battery will be certified and tested to UL 9540A, a test method intended to document the fire characteristics associated with thermal event or fire and would confirm that the system would self-extinguish without active fire-fighting measures. The results of the UL 9540A test would show that any internal fire is contained within the enclosure and not spread to the other parts of the facility. If applicable, the system will use a chemical agent suppressant-based system to detect and suppress fires. If smoke or heat were detected, or if the system were manually triggered, an alarm would sound, horn strobes would flash, and the system would release suppressant, typically FM 200, NOVEC 1230 or similar from pressurized storage cylinders.

The Project owner shall coordinate with the BLM and RCFD to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the Project site,

including incidents such as fire or explosion at or with the BESS. The Project owner shall also prepare procedures for disconnecting or shutting down the BESS in case of fire or to reduce the chance of fire.

6. WILDFIRE DETECTION AND SUPPRESSION

6.1. Wildland Fire Management Plans and Policies

Federal, state, and local laws, regulations, and policies applicable to the Project are described below. All fire mitigation measures included in the Fire Plan meet the requirements of all federal, state, and local laws, and regulations.

Federal Law, Regulations, and Policies

Federal Wildland Fire Management Policy. On BLM-administered lands in the California Desert, the BLM implements Federal Wildland Fire Management policies and objectives in coordination with state and other federal agencies as part of the California Desert Interagency Fire Management Organization. The Federal Wildland Fire Management Policy was developed by a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. The policy acknowledges the essential role of fire in maintaining natural ecosystems, but also prioritizes firefighter and public safety first in every fire management activity and focuses on risk management as a foundation for all fire management activities. The policy promotes basing responses to wildland fires on approved Fire Management Plans and land management plans, regardless of ignition source or the location of the ignition.

National Electric Safety Code (NESC) and American National Standards Institute (ANSI) Guidelines. A variety of line and tower clearance standards are used throughout the electric transmission industry. Nationally, most transmission line owners follow the NESC rules or ANSI guidelines, or both, when managing vegetation around transmission system equipment. The NESC deals with electric safety rules, including transmission wire clearance standards, whereas the applicable ANSI code deals with the practice of pruning and removal of vegetation.

State Law, Regulations, and Policies

California Fire Plan. The Strategic California Fire Plan was finalized in June 2010 and directs each CAL FIRE Unit to prepare a specific Fire Management Plan. for their areas of responsibility. These documents assess the fire situation within each of CAL FIRE's 21 units and six contract counties. The plans include stake-holder contributions and priorities and identify strategic areas for pre-fire planning and fuel treatment, as defined by the people who live and work with the local fire problem. The plans are required to be updated annually.

Local Law, Regulations, and Policies

Riverside County General Plan. The intent of the Safety Element of the Riverside County General Plan is to reduce death, injuries, property damage, and economic and social impact from hazards. The following policies included in the Safety Element generally relate to the proposed Project with respect to hazards and hazardous materials (County of Riverside, 2019).

- **Policy S 5.1.** Develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features through the following:

- All proposed development and construction within Fire Hazard Severity Zones shall be reviewed by the Riverside County Fire and Building and Safety departments.
- All proposed development and construction shall meet minimum standards for fire safety as defined in the Riverside County Building or County Fire Codes, or by County zoning, or as dictated by the Building Official or the Transportation Land Management Agency based on building type, design, occupancy, and use.
- In addition to the standards and guidelines of the California Building Code and California Fire Code fire safety provisions, continue to implement additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate under the Riverside County Fire Code (Ordinance No. 787) Protection Ordinance. These shall include assurance that structural and nonstructural architectural elements of the building will not impede emergency egress for fire safety staffing/ personnel, equipment, and apparatus; nor hinder evacuation from fire, including potential blockage of stairways or fire doors.
- Proposed development and construction in Fire Hazard Severity Zones shall provide secondary public access, in accordance with Riverside County Ordinances.
- Proposed development and construction in Fire Hazard Severity Zones shall use single loaded roads to enhance fuel modification areas, unless otherwise determined by the Riverside County Fire Chief.
- Proposed development and construction in Fire Hazard Severity Zones shall provide a defensible space or fuel modification zones to be located, designed, and constructed that provide adequate defensibility from wildfires.

- **Policy S 5.4.** Limit or prohibit development or activities in areas lacking water and access roads.
- **Policy S 5.6.** Demonstrate that the proposed development can provide fire services that meet the minimum travel times identified in Riverside County Fire Department Fire Protection and EMS Strategic Master Plan.
- **Policy S 7.14.** Regularly review and clarify emergency evacuation plans for dam failure, inundation, fire and hazardous materials releases.
- **Policy S 7.15.** Develop a blueprint for managing evacuation plans, including allocation of buses, designation and protection of disaster routes, and creation of traffic control contingencies.

Desert Center Area Plan. The intent of the Wildland Fire section of the Hazards section of the Desert Center Area Plan (a part of the General Plan) is to address wildland fire susceptibility for improved public safety in the Desert Center area. The following policy included in the Desert Center Area Plan generally relates to the proposed Project with respect to public services and utilities (County of Riverside, 2015).

- **Policy DCAP 10.1.** Protect life and property from wildfire hazards through adherence to the Fire Hazards section of the General Plan Safety Element.

Riverside County Fire Department (RCFD) Technical Policy TP-15-002. The RCFD TP-15-002, titled Solar Energy Generating System (SEGS) Fire Apparatus Access Roads, is a standard that was developed to assist with the design of fire apparatus access roads from public roadways to a SEGS (i.e., solar facility). It addresses secondary access road requirements, which shall be determined by the County Fire Marshal given the specific conditions of any given solar project (Riverside County Fire Department, 2020). Each SEGS project will be reviewed on a case-by-case basis to determine secondary fire apparatus access requirements to facilitate emergency operations and to minimize the possibility of an access point being subject to congestion or obstruction during an emergency incident. This standard states that the secondary access road shall not be less than 20 feet in width and shall have an unobstructed vertical clearance

of no less than 13 feet, 6 inches. The grade of the access road shall not exceed 15 percent. The access road shall be designed, constructed, and maintained to support the imposed load of fire apparatus weighing at least 75,000 pounds and constructed to Riverside County Transportation Standards. A registered engineer shall certify the design and construction of the access road based on the fire apparatus-imposed load of 75,000 pounds.

6.2. Detection and Reporting

All fires shall be reported to the BLM and RCFD immediately. Table 1 provides applicable emergency services contact information.

Table 1. Emergency Contacts

Contact	Phone	Procedure
Fire	**911** 951-657-2161 emergency 951-940-6949 for non-emergency	ALL fires (on and within sight of the Project) shall be immediately reported. When reporting an incident, you need the following information: ▪ Type of incident (fire, explosion, etc.) ▪ Location of incident ▪ Time of incident ▪ Information on any injury or fatality ▪ Name and phone number for callback
Ambulance	**911**	
Federal Interagency Communication Center (BLM)	909-383-5651	
CAL FIRE Fire/Incident Investigations	951-943-4970	
CAL FIRE Arson Hotline	800-468-4408	
Riverside County Emergency Operations Center	951-955-4700	
Riverside County Fire Information	951-940-6985	

6.3. Suppression and Response

If a fire is identified, the following steps shall be implemented:

- If it is safe to do so, extinguish a fire using on-site fire extinguishers and appropriate tools.
- Notify emergency services immediately, even if the fire appears out.
- Initiate emergency procedures, as appropriate, including electrical isolation.
- If an off-site wildfire threatens the facility while personnel are on site, evacuate the site if it is safe to do so, meet at a predetermined location to ensure that all personnel have safely evacuated.

7. EMERGENCY, SAFETY AND WORKER ENVIRONMENTAL AWARENESS PROGRAM

A written emergency response plan (ERP) will be developed in accordance with Occupational Safety and Health Administration (OSHA) standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards governing such emergencies. Contractor(s) will include the ERP in the contractor's Project Safety Plan (PSP) and train all contractor representatives on the provisions of the ERP.

The safety of personnel is the top priority during the construction, operations, maintenance, and decommissioning of the Project. Required staff training would include fire prevention procedures, environmental, cultural, and health and safety training, in part through the Project's Worker Environmental Awareness Program (WEAP). Annual familiarity training would be conducted with the local authorities, including

police, BLM, and RCFD, as appropriate including annual First Aid and CPR training. The construction, operations, and contractor management staff will work to implement safety recommendations and assist in conducting site inspections.

In the event of an emergency response, the individual that discovered the emergency would conduct the following measures:

1. Personnel would assess the situation to determine potential safety concerns and hazards posed to personnel and the environment. Protective actions for life safety are the first priority.
2. All personnel will be moved or evacuated to a safe location. Access to the affected area would be prohibited. (The final ERP will include a site-specific evacuation plan and a shelter-in-place plan.)
3. Stabilization of the incident is the second priority. Anyone who witnesses an unusual situation that cannot be corrected routinely must notify their supervisor immediately and, while respecting the jurisdiction and ability, he/she must take the necessary measures to control the situation until the arrival of the Emergency Coordinator or supervisor.
4. The construction contractor would immediately notify the Project operator's construction supervisor and environmental monitor of any emergencies and Project operator would notify federal, state, and local authorities, as appropriate. If an emergency threatens public or worker health, the contractor would make appropriate notification(s) to emergency personnel by calling 911.

8. REFERENCES

CAL FIRE (California Department of Forestry and Fire Protection). 2020. Fire Hazard Severity Zone (FHSZ) Viewer. [Online]: https://egis.fire.ca.gov/FHSZ/.

_____. 2007. FHSZ GIS Data for California.

County of Riverside. 2019. General Plan, Chapter 6 – Safety Element. [Online]: https://planning.rctlma.org/Portals/14/genplan/2019/elements/Ch06_Safety_080619.pdf.

Riverside County Fire Department. 2020. Technical Policy: SEGS Fire Apparatus Access Roads. [Online]: http://www.rvcfire.org/StationsAndFunctions/AdminSppt/FireMarshal/Documents/Standards/TP15 002 SEGSAccessRoadways 01072020.pdf.

Attachment A

FIRE PLAN TRAINING LOG

Fire Plan Training Log

Appropriate training for all employees and regular site contractors will be implemented annually to ensure all personnel are adequately prepared to reduce fire risk at the facility and are aware of actions to be taken in the event of a fire emergency.

Instructor Only – This training event included the following subject matters (check box beside those that apply):	
☐	Preventing risks of fire
☐	Requirements for informing visitors/contractors of fire risks and ignition control
☐	Functionality of fire protection systems and installations as well as how to handle them
☐	Correct response in case of fire, e.g., reporting processes
☐	Correct use of fire suppression equipment, e.g., fire extinguishers
☐	Understanding of safe evacuation processes

Instructor Name: _____ Signature: _____

Date: _____

Trainee Printed Name	Trainee Signature	Company	Date

Attachment B

TESLA MEGAPACK 2 XL FIRE PROTECTION ENGINEERING and UL 9540A INTERPRETATION REPORT

Tesla Megapack 2 XL

Fire Protection Engineering and
UL 9540A Interpretation Report

FIRE & RISK ALLIANCE

EXECUTIVE SUMMARY

Fire & Risk Alliance (FRA), performed a fire protection engineering (FPE) analysis of Tesla's Megapack 2 XL (MP2XL) battery energy storage system (BESS). The MP2XL (MP2XL) is a lithium ion BESS with a storage capacity up to four megawatt hours (MWh). The MP2XL is a fully integrated BESS consisting of battery modules, power electronics, control systems, a battery management system, a thermal management system, and an explosion control system all pre assembled within a single, non occupiable cabinet. They are meant for outdoor installations, mounted to the ground, for commercial, industrial, and utility applications. This FPE analysis includes a review of the MP2XL, its construction, design, fire safety features, and an analysis of the UL 9540A cell, module, and unit level test data. Based on this review, FRA offers the following summary of our findings:

1. UL 9540A cell and module level testing demonstrated that flammable gases vent from the MP2XL cells during thermal runaway; however, the cells do not release toxic gases sometimes associated with the failure of lithium ion batteries, such as HCN, HCL and HF.

2. UL 9540A unit level testing forced six cells into thermal runaway, which resulted in propagation to a seventh cell; however, thermal runaway did not propagate beyond the seventh cell.

3. During UL 9540A unit level testing, the MP2XL met all the performance criteria of UL 9540A, Table 9.1. Therefore, UL 9540A installation level testing is not required for a MP2XL installation.

4. The MP2XL can meet or exceed all the installation level codes and standards, such as the IFC and NFPA 855, required for outdoor, ground mounted BESS installations when it is installed in accordance with the MP2XL Design and Installation Manual.

This executive summary is an abbreviated list of findings. Refer to the main report for details of the analysis.

Fire & Risk Alliance
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1. INTRODUCTION

Fire & Risk Alliance (FRA), performed a fire protection engineering (FPE) analysis of Tesla's Megapack 2 XL (MP2XL) battery energy storage system (BESS). The MP2XL is a lithium-ion BESS with a storage capacity of up to four megawatt hours (MWh). The MP2XL is a fully integrated BESS consisting of battery modules, power electronics, control systems, a battery management system, a thermal management system, and an explosion control system all pre-assembled within a single, non-occupiable cabinet. They are meant for outdoor installations, mounted to the ground, for commercial, industrial, and utility applications. This FPE analysis includes a review of the MP2XL, its construction, design, and fire safety features, and an analysis of the UL 9540A cell, module, and unit-level test data. This narrative has been prepared by FRA and summarizes our analysis. It is intended to be used as a tool for a project designer, installer, fire code official (FCO), or an authority having jurisdiction (AHJ) to assist in their design, installation, or review of a MP2XL installation.

1.1 Codes, Standards, and Test Methods

The following codes, standards, and test methods have been applied to this analysis:

- 2024 International Building Code® (IBC).
- 2024 International Fire Code® (IFC).
- 2024 NFPA 1, Fire Code (NFPA 1).
- 2023 NFPA 855, Standard for the Installation of Stationary Energy Storage Systems (NFPA 855).
- 2023 NFPA 68, Standard on Explosion Protection by Deflagration Venting (NFPA 68).
- 2024 NFPA 69, Standard on Explosion Prevention Systems (NFPA 69).
- IEC 60529, Degrees of Protection Provided by Enclosures, 2.2 Edition, January 2019 (IP Code).
- IEC 62619, Secondary cells and batteries containing alkaline or other non-acid electrolytes – Safety requirements for secondary lithium cells and batteries, for use in industrial applications, Edition 1.0, 2017 (IEC 62619).
- IEC 62933-5-2, Electrical energy storage (EES) systems - Part 5-2: Safety requirements for grid-integrated EES systems - Electrochemical-based systems, April 15, 2020 (IEC 62933-5-2).
- UL 1642, Lithium Batteries, Edition 6, September 29, 2020 (UL 1642).
- UL 1973, Standard for Batteries for Use in Stationary, Vehicle Auxiliary Power and Light Electric Rail (LER) Applications, Edition 2, February 7, 2018 (UL 1973).
- UL 9540, Standard for Safety of Energy Storage Systems and Equipment, Edition 2, February 27, 2020 (UL 9540).
- UL 9540A, Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems, Edition 4, November 12, 2019 (UL 9540A).

1.2 Reference Materials

In addition to the fire codes, standards, and test methods listed above, the following reference materials were reviewed as part of this analysis:

- MP2XL Design and Installation Manual – Rev. 2.2, dated January 30, 2024 (MP2XL DIM).
- MP2XL Operation and Maintenance Manual - Rev. 1.2, dated January 30, 2024 (MP2XL O&MM).
- Industrial Lithium-Ion Battery Emergency Response Guide – Rev. 2.7, dated February 16, 2024 (ERG).
- MP2/2XL UL 9540A Cell Level Fire Test Report, dated February 25, 2022.
- MP2/2XL UL 9540A Module Level Fire Test Report, dated July 15, 2022.
- MP2/2XL UL 9540A Unit Level Fire Test Report, dated August 5, 2022.
- Megapack 2XL Compliance Packet – Rev. 2.8, dated February 14, 2024.

1.3 Acronyms and Abbreviations

Authority Having Jurisdiction	AHJ	Light Electric Rail	LER
Battery Energy Storage System	BESS	Lithium Iron Phosphate	LFP
Battery Management System	BMS	Lower Flammability Limit	LFL
Centimeter	cm	Megapack 2	MP2
Contemporary Amperex Technology Co., LTD	CATL	Megapack 2XL	MP2XL
Controller Area Network	CAN	Megapack 2 & 2 XL	MP2/2XL
Customer Input/Output Terminals	I/O	Megawatt hour	MWh
Customer Interface Bay	CIB	Meter	m
Electrical Energy Storage	EES	Millimeter	mm
Emergency Response Plan	ERP	National Fire Protection Association	NFPA
Energy Storage System	ESS	Nationally Recognized Testing Laboratory	NRTL
Fire Code Official	FCO	Non-walk-in	NWI
Failure Modes and Effects Analysis	FMEA	Parts Per Million	ppm
Feet	ft	Pound Per Square Inch Gauge	psig
Fire Protection Engineering	FPE	Safety Data Sheet	SDS
Fire & Risk Alliance, LLC	FRA	Second	s
Gram	g	State of Charge	SOC
International Electrotechnical Commission	IEC	Supervisory Control and Data Acquisition	SCADA
International Fire Code	IFC	Tesla Site Controller	TSC
Inch	in	Thermal Management System	TMS
Kilogram	kg	TÜV SÜD	TÜV
Kilowatt hour	kWh	UL, LLC	UL

2. MP2XL DESIGN & FIRE SAFETY FEATURES

The MP2XL is a fully integrated BESS consisting of battery modules, power electronics, control systems, a battery management system, a thermal management system, and an explosion control system all pre-assembled within a single, non-occupiable cabinet. The MP2XL has a standardized, modular design that is not customizable or adjustable. MP2XL arrives at the site fully assembled needing just the alternate current (AC) connection and communications cables to be connected on the site. Meaning, every installation has the same MP2XL cabinets that are pre-assembled at the factory. It is approximately 28.9 ft in length, 5.4 ft deep, 9.2 ft in height, and can weigh up to 84,000 pounds (8.800 m by 1.650 m by 2.785 m and 38,100 kg). Below is a brief description of the MP2XL, its components, design listing, and fire safety features. For a more detailed discussion on the MP2XL components, their location, functionality, and purpose, refer to the MP2XL DIM.

2.1 Cabinet Layout

The MP2XL is intended for outdoor installations, ground-mounted to a foundation or base strong enough to support the weight of the equipment and anchor loads (including concrete pads, grade beams, etc.). The thermal roof (part of the thermal management system) is enclosed within an IP20 enclosure that sits above the battery module bays, as shown in Figure 1.

Figure 1 MP2XL internal components: (1) Battery Module Bays, (2) Thermal Cabinet, (3) Customer Interface Bay, (4) IP20 Thermal Roof Enclosure, (5) IP66 Enclosure.

The lithium-ion batteries are housed inside an IP66 steel enclosure (battery module bay) that provides protection against particle and water ingress coming into contact with the battery modules and power electronics. The IP66 enclosure is one continuous unit, meaning each of the ten bays are open to one another. However, when the MP2XL cabinet is populated with battery modules, it cannot be entered. This modular, cabinet style approach allows for the system to be easily maintained and serviced from outside the cabinets

(i.e., the battery modules, thermal management system, and power electronics are serviced through doors located on the front of the cabinets or from the top through the thermal roof), thus eliminating the need for personnel to enter an enclosure, structure, building or container to perform those activities. Since the BESS cabinets do not permit walk-in access, it is a non-walk-in style (NWI) BESS, they are not defined as occupied buildings or structures per the IBC, IFC, NFPA 1, or NFPA 855.

2.2 Cells and Battery Modules

The MP2XL can be populated with up to twenty-four battery modules with a maximum storage capacity of 3,854.4 kWh for the 2-hour duration system, 3,847.2 kWh for the 3-hour duration system, and 3,916.8 kWh for the 4-hour duration system. Each battery module contains three battery trays, as shown in Figure 2, which are arrays of prismatic, lithium phosphate (LFP) cells. The LFP cells (the cells) utilized in the MP2XL are 157.2 amp hour (Ah) with a nominal voltage of 3.22 volts (V) and are individually hermetically sealed. They are approximately 50.75 millimeters (mm) by 166.0 mm by 169.3 mm and weigh 2,991 grams (g). Each battery tray contains 112 cells; therefore, each battery module has 336 cells, and a fully populated MP2XL (twenty-four battery modules) has 8,064 cells. Note the MP2XL utilizes the same cells and battery modules found in the Megapack 2 (MP2).

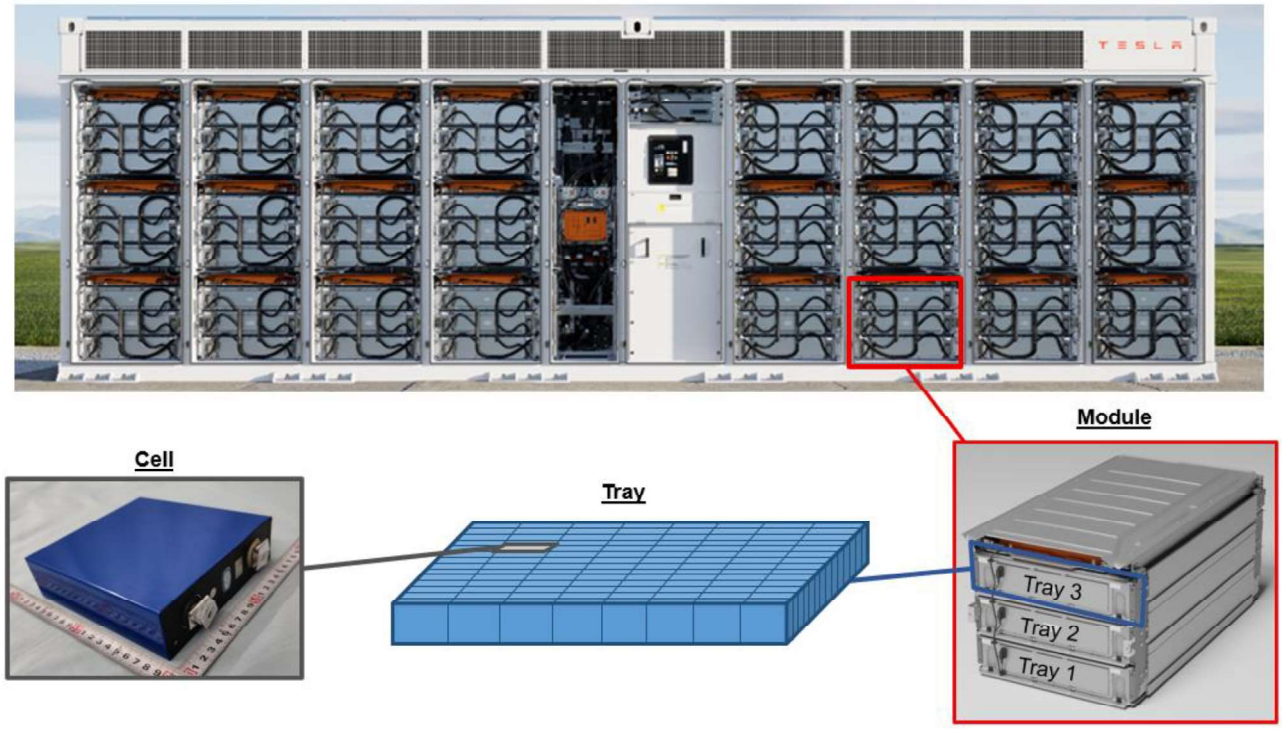

Figure 2 MP2XL, module, generalized tray, and an individual cell layout.

2.3 Customer Interface Bay

The Customer Interface Bay (CIB) is a single bay that includes all the external connections needed for initial MP2XL installation. When the fully assembled MP2XL arrives at the site, the only work necessary inside the cabinet is performed inside the CIB. Once installed, the CIB is a user-accessible area designed for operation and servicing. The CIB includes the main AC breaker, a status panel and controller area network (CAN) interface for service personnel, customer input/output (I/O) terminals, and the keylock switch (a "Lock Out/Tag Out" switch), which shuts down the AC bus to permit MP2XL maintenance by service personnel.

2.4 Thermal Management System

The thermal management system (TMS) provides a suitable operating temperature for MP2XL. The thermal bay and thermal roof house the components of the TMS. The TMS contains a closed-loop liquid cooling system that circulates a 50/50 mixture of ethylene glycol and water throughout the battery modules and power electronics to maintain an optimum battery operating temperature. The TMS works autonomously and does not require user feedback or controls to turn the system on when needed or to adjust temperature settings. The thermal cabinet includes pumps that circulate the liquid coolant through the MP2XL, an in-line heater that can warm the coolant and a compressor that maintains thermal control for the cabinet. The thermal roof, located above the battery bays within its own IP20 enclosure, provides a ventilation airspace for the MP2XL. It contains fans and radiators that cool the ethylene glycol-water solution. Cool air enters the thermal roof through the grates on the front of the MP2XL. The cool air then passes over the radiators, absorbing heat, and then is exhausted out of the top of the thermal roof via fans, as shown in Figure 3. The liquid cooling system utilizes approximately 400 liters (106 gallons) of the ethylene glycol-water solution, and the compressor utilizes 1.5 kilograms (3.3 pounds) of R-134a refrigerant for the 4-hour duration MP2XL and 3.0 kilograms (6.6 pounds) for the 2-hour duration MP2XL.

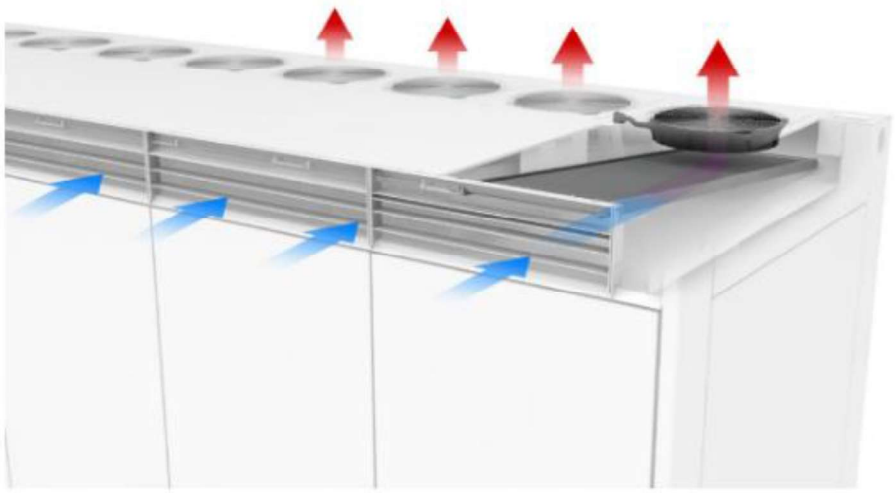

Figure 3 Airflow through the thermal roof.

2.5 Battery Management System

The MP2XL has an integrated battery management system (BMS) that tracks the performance, voltage, current, and state of charge of the cells (among many other datapoints). The BMS is a layered system, where each battery module has its own BMS and the MP2XL itself has a bus controller supervising the output of all the battery modules at the AC bus level. The BMS is engineered to react to fault conditions in an autonomous manner, with safeguards built into the firmware. These fault conditions include, but are not limited to, over-temperature, loss of communication, over-voltage, and isolation. For instance, to prevent a cell over-temperature the TMS is enabled by the BMS to cool the cells/module. This action by the BMS (which is just one example of many ways the BMS can respond to a fault condition) can either prevent thermal runaway from occurring in the cell or prohibit the propagation of thermal runaway to adjacent cells. Depending on the severity of the fault condition, the BMS can automatically isolate the affected battery module temporarily (less severe fault) or it can permanently disconnect the module.

2.6 Site Controller and Monitoring

Beyond the built-in safeguards of the BMS described above, the MP2XL is supported by a Tesla Local Operations Center (LOC), which is designed to support the global fleet of energy storage products. The MP2XL has 24/7 remote monitoring, diagnostics, and troubleshooting capabilities, without needing a Tesla technician on site. Customers and first responders also benefit from immediate hotline support from trained technicians via these LOCs. Additionally, the local energy provider or the facility can monitor the MP2XL through a local Supervisory Control and Data Acquisition (SCADA) system. All faults are transmitted to a Tesla LOC, alerting them to off-normal conditions that may require corrective action, either through remote means or an in-person field service visit. This communication link is accomplished via the Tesla Site Controller (TSC). The TSC provides the single point of interface for the utility, network operator, and/or the customer's SCADA systems to control and monitor the entire energy storage site. It dictates the charge and discharge functions of the MP2XL cabinets, aggregating real-time information and using the information to optimize the commands sent to each individual MP2XL cabinet. As such, every MP2XL has a wired Ethernet connection to the TSC, which communicates with a Tesla LOC via a built-in cellular modem. If the cellular network in the installation area is not sufficient, a hardwired internet connection can be provided. Additionally, if the BESS owner or operator wants a network connection for a control interface, the TSC becomes that point of connection to the MP2XL cabinet at the site

2.7 Electrical Fault Protection Devices

The MP2XL has several passive and active safety control mechanisms installed within the battery module circuit and distribution circuit that would be available to interrupt a fault current. At a high level, these electrical fault protection features include:

- Battery module overcurrent protection: The battery modules contain DC single-use fusible links mounted directly on the battery modules. These fuses are one-time only use safety devices that can interrupt the flow of an overcurrent in the battery module during an off-normal electrical event.

- Inverter DC protection: The inverter modules, which are installed at each of the battery modules, are equipped with a high-speed pyrotechnic fuse that can isolate the battery module passively or actively during an off-normal event.
- Inverter AC protection: In addition, each inverter module is equipped with its own AC contactor and AC fuses should an off-normal electrical event occur at the inverter module on the AC side of the circuit.
- Ground fault protection: Finally, the MP2XL is also provided with a DC ground fault detection system. It measures insulation resistance prior to operation and looks for excessive leakage current during operation. Additionally, the MP2XL also contains an AC circuit breaker, with ground-fault trip settings, which is installed within the CIB to provide distribution system protection.

2.8 Explosion Control System

The MP2XL includes an explosion control system to mitigate the risk of an uncontrolled deflagration. The system includes pressure-sensitive vents (overpressure vents) and sparkers installed throughout the battery module bay. The sparkers are designed to ignite flammable gases very early in a thermal runaway event before they accumulate within the enclosure and become an explosion hazard. They are installed at a variety of locations and heights throughout the battery module bays to ensure the flammable gases released during thermal runaway quickly meet an ignition source. Note, this explosion control system is the same approach that Tesla has utilized in previous versions of the Megapack (Megapack 1 and Megapack 2) and is not a new concept. It has been extensively validated through installation level testing for these previous Megapack versions as well as the MP2XL and its performance has been demonstrated in the field during thermal events involving Megapacks.

The overpressure vents are installed in the roof of the sealed battery bay's IP66 enclosure, as shown in Figure 4. When activated, the overpressure vents open up into the enclosed thermal roof, ensuring that the release of the overpressure vents does not create a projectile hazard. In addition, since they are installed in between the battery module bays and the thermal roof, the overpressure vents are not exposed to the environment, which means they are protected from the elements, such as falling tree limbs or snow, which could impact their functionality.

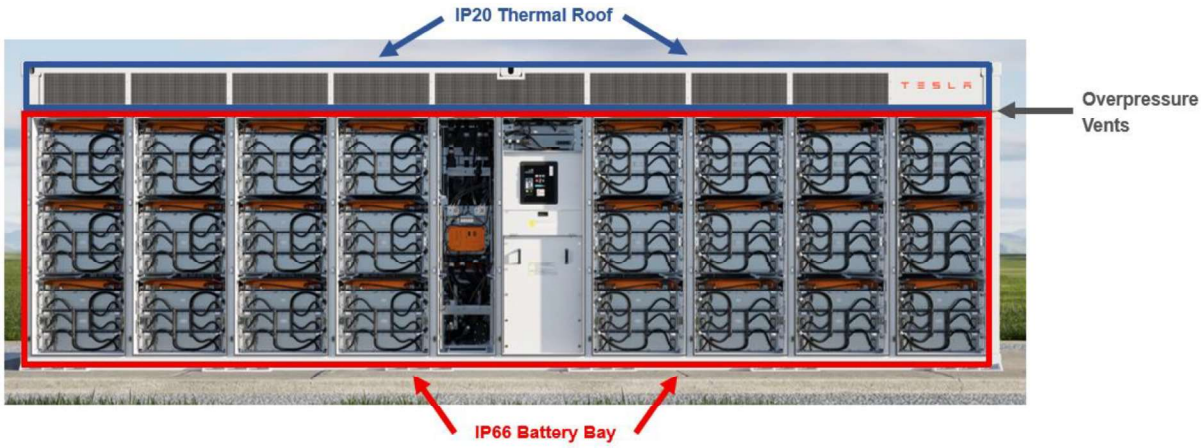

Figure 4 Location of overpressure vents in between the IP66 battery bay and the IP20 thermal roof

Once opened, the overpressure vents permit gases, products of combustion, and flames to safely exhaust through the roof of the MP2XL during a thermal event. By designing this natural ventilation flow path, flammable gases are not permitted to accumulate within the MP2XL cabinet, reducing the risk of a deflagration or explosion that could compromise the cabinet's integrity, push open the front doors, or expel projectiles from the cabinet. In addition, the ventilation path creates a controlled fire condition, should one occur, out the top of the MP2XL cabinet. By maintaining the MP2XL cabinet's integrity, keeping all the doors shut during a fire event, reducing the risk of projectiles, and creating a controlled path for flames to exit the top of the MP2XL cabinet, the likelihood of a thermal event having an impact on life safety, site personnel or first responders, is reduced. In addition, by maintaining these features, the likelihood of a fire propagating to adjacent MP2XL cabinets, electrical equipment, or other exposures is also reduced.

The overpressure vents themselves are passive and are not actuated or controlled by another device. They are designed to release during an overpressure event, such as the rapid ignition of flammable gases by a sparker. The number and total area of overpressure vents were sized following the guidance of NFPA 68 with a safety factor of two times the enclosure's strength, including the front doors. Tesla developed the overpressure vents and sparker system because the direct application of NFPA 68 or NFPA 69 is not suitable for the MP2XL cabinet, which does not have large volumes of open-air space. This engineered approach is permitted by NFPA 855 §9.6.5.6.4 provided it is validated by installation-level fire and explosion testing and an engineering evaluation, which Tesla has performed.

2.9 Fire Detection

The MP2XL does not have an internal fire detection system or one that is integral to its design/construction. If fire detection is required at the BESS site, multi-spectrum IR flame detectors can be installed external to the MP2XL to detect flames exiting the cabinets. Testing performed by Tesla has demonstrated that multi-spectrum IR flame detectors are capable of detecting a fire once flames have exited the cabinet.

2.10 Clearances

The MP2XL can be installed back-to-back and side-to-side with a clearance distance of 6 inches and can be installed 8 feet in front of adjacent MP2XL cabinets. These clearance distances are based on large-scale fire tests and fire modeling results that demonstrate a fire will not propagate from one MP2XL to adjacent MP2XL cabinets.

2.11 Emergency Response

Tesla developed a lithium-ion battery emergency response guide (ERG) to provide guidance to anyone responding to an emergency involving a MP2XL. This guide can be utilized by site owners to develop their own site-specific emergency response plans.

3. MP2XL PRODUCT LISTINGS

The MP2XL and its subcomponents are certified or listed to multiple national and international product design standards. These certifications and listings apply to the cells, battery modules, inverters, power electronics, control systems, integration between the BESS and the grid, as well as the BESS as a whole. The standards highlighted below pertain to the lithium-ion cells, the battery modules, and the MP2XL BESS at the unit level. For a full listing of all certifications and listings for all the MP2XL components, please refer to the MP2XL Compliance Packet.

3.1 Cell and Module Level

The lithium-ion batteries utilized in MP2XL are certified and listed to national and international product safety standards from entities such as UL, LLC (UL) and the International Electrotechnical Commission (IEC). These certifications include, but are not limited to:

UL 1642: This certification standard is applicable to secondary (rechargeable) lithium-ion cells and batteries used as a power source (such as BESS). The standard's requirements are intended to reduce the risk of fire or explosion when the battery is used in a product. For example, the standard subjects lithium-ion batteries to severe abuse conditions and evaluates if they can safely withstand them.

UL 1973: This certification standard is applicable to batteries and battery systems utilized for energy storage. The standard evaluates the battery system's ability to safely withstand simulated abuse conditions. For example, the standard subjects module-level stationary batteries to an internal fire exposure test to force a thermal runaway in one cell to ensure it does not explode, propagate fire to neighboring cells, or propagate to the rest of the modular battery system. UL 1973 applies to stationary BESS applications, such as photovoltaic installations and wind turbine energy storage systems, as well as other specialized energy storage systems, such as light electric rail (LER) operations.

IEC 62619: This safety standard specifies requirements and tests to ensure the safe operation of secondary (rechargeable) lithium-ion cells and batteries used in ESS and in other industrial applications. Electrical safety is covered under Clause 8 of the standard, which requires the completion of a risk analysis to determine specific electrical safety issues associated with the intended use of a given battery system or device.

3.2 Unit Level

The MP2XL, as entire cabinets, are also certified, tested, and listed to national and international product safety standards and test methods, including, but not limited to:

IEC 62933-5-2: This safety standard addresses various aspects of BESS, including the requirements for grid-integrated BESS.

UL 9540: This standard covers energy storage systems (including lithium-ion BESS) for stationary indoor and outdoor installations and establishes the system-level certification for energy storage systems and their associated equipment.

UL 9540A: The test methodology evaluates the fire characteristics and thermal runaway fire propagation of a BESS (including lithium-ion BESS). The test method provides a means to evaluate thermal runaway and fire propagation at the cell level, module level, and unit level. The data generated from the test method can be used to determine the fire and explosion protection required for a BESS installation based on fire test data. This test is specifically referenced by the IFC, NFPA 1, and NFPA 855 to demonstrate the functionality of the BESS fire protection features during large-scale fire testing.

3.3 Installation Level

The MP2XL can meet the installation level requirements in the 2024 Edition of the International Fire Code, the 2023 Edition of NFPA 855, and the 2022 California Fire Code for outdoor, ground-mounted BESS installations when they are installed in accordance with its listing and the MP2XL DIM.

4. UL 9540A TESTING

The UL 9540A test method provides a method to evaluate thermal runaway and fire propagation of a lithium-ion BESS at the cell level, module level, unit level, and installation level. The data generated from the test method can be used to determine the fire and explosion protection systems/features required for a BESS installation. This includes, but is not limited to, thermal runaway characteristics of the cell; cell thermal runaway gas composition; the fire propagation potential from cell to cell, module to module, and unit to unit; products of combustion; heat release rate; smoke release rate; and performance of fire protection systems. A summary of the cell, module, and unit-level test results for the MP2XL is provided below.

4.1 UL 9540A Cell Level Testing

Cell-level testing was conducted at UL in December 2021. UL is an OSHA-approved Nationally Recognized Testing Laboratory (NRTL) and offers the UL mark for products. Testing was performed on five model CB5T0, 3.22 V, 157.2 Ah, LFP cells manufactured by Contemporary Amperex Technology Co., Ltd. (CATL) for use in the Megapack 2 and Megapack 2 XL (MP2/2XL).[1] Each cell was charged to 100% state of charge (SOC) prior to testing. Thermal runaway was initiated via film strip heaters installed on both of the wide side surfaces of each cell, as shown in Figure 5. Meaning two heaters were installed on each cell. The heaters were programmed to increase the temperature of the cell's surface by approximately 4.5°C per minute until the cell vented and went into thermal runaway. The cell was placed within an enclosed enclosure and the products released during testing were collected and analyzed.

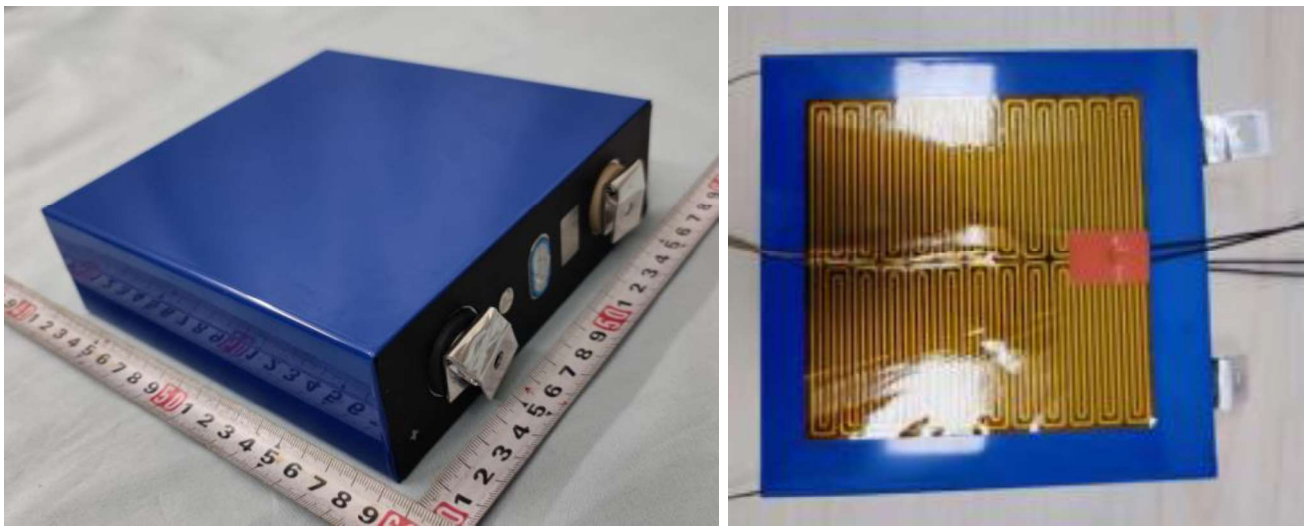

Figure 5 Individual cell tested to UL 9540A (left) and installed film strip heater (right).

[1] Note, as described in Section 2.2, the MP2 and MP2XL utilize the same cells and battery modules.

4.1.1 Test Results

The key flammability and gas composition properties from the UL 9540A cell level tests are summarized below in Table 1 and Table 2.

Table 1 UL 9540A Cell Level Testing: Key Flammability Characteristics

Flammability Property	Value
Average cell surface temperature at gas venting	174°C
Average cell surface temperature at thermal runaway	239°C
Cell vent gas volume released	93.3 L
LFL, % volume in air at the ambient temperature	7.15%
LFL, % volume in air at the venting temperature	6.05%
Burning Velocity (S_u)	90.0 cm/s
Maximum pressure (P_{max})	98.46 psig

Table 2 UL 9540A Cell Level Testing: Cell Vent Gas Composition (Excluding O_2 and N_2)

Gas Name	Chemical Structure	% Measured	Component LFL
Carbon Monoxide	CO	10.881	10.9
Carbon Dioxide	CO2	27.107	N/A
Hydrogen	H2	50.148	4.0
Methane	CH4	6.428	4.4
Acetylene	C2H2	0.264	2.3
Ethylene	C2H4	3.283	2.4
Ethane	C2H6	1.100	2.4
Propene	C3H6	0.379	1.8
Propane	C3H8	0.125	1.7
-	C4 (Total)	0.190	N/A
-	C5 (Total)	0.027	N/A
-	C6 (Total)	0.005	N/A
Benzene	C6H6	0.002	1.2
Toluene	C7H8	0.002	1.0
Dimethyl Carbonate	C3H6O3	0.055	N/A
Ethyl Methyl Carbonate	C4H8O3	0.004	N/A
Total	-	100	-

4.1.2 Key Takeaways

Key takeaways from the tests include:

- The average cell vent and thermal runaway temperature was determined to be 174°C (345°F) and 239°C (462°F), respectively.
- 93.3 liters of cell vent gases were released.
- The cell vent gas mixture is flammable and has an LFL of 7.15% at ambient temperature.
- The cell vent gases were predominantly (approximately 95%) Carbon Monoxide (CO), Carbon Dioxide (CO_2), Hydrogen (H_2), and Methane (CH_4).
- Toxic gases sometimes associated with lithium-ion batteries, such as Hydrogen Fluoride (HF), Hydrogen Chloride (HCL), and Hydrogen Cyanide (HCN) were not vented from the cell.

4.1.3 Performance Criteria

UL 9540A, Section 7.7 outlines the performance criteria for the cell level test. If all these conditions are met, further testing (such as module, unit, or installation level tests) are not required. The acceptable performance criteria during the UL 9540A cell level test are as follows:

1. Thermal runaway cannot be induced in the cell.
2. The cell vent gas does not present a flammability hazard when mixed with any volume of air, at both ambient and vent temperatures.

Given the cell went into thermal runaway and vented flammable gases, UL 9540A module level testing was required.

4.2 UL 9540A Module Level Testing

Module level testing was conducted at a TÜV SÜD (TÜV) laboratory in May 2022. TÜV is an OSHA-approved NRTL and offers the cTÜVus mark, which is equivalent to other NRTL marks such as UL, ETL or CSA. Testing was performed on a 360.64 V, 157.2 Ah, MP2/2XL tray (model MP2 Module), manufactured by CATL.[2] Each tray consists of 112, CATL model CB5T0 LFP cells that were charged to 100% SOC prior to testing. During the test, the MP2XL tray is not connected to the BMS or TMS; meaning, they are not actively operating to prevent thermal runaway in a cell or to prohibit the propagation of thermal runaway from cell to cell. Thermal runaway was initiated via film strip heaters installed on both of the wide side surfaces of two cells, similar to the cell level test (see Figure 5). This resulted in the simultaneous heating of six cells forcing multiple cells into thermal runaway at approximately the same time. The heaters were programmed to increase the temperature of the cell's surface by approximately 4.17 - 4.52°C per minute until the cells vented and went into thermal runaway. The tray was placed under an instrumented hood and the products released during combustion were collected for analysis.

[2] Note, as described in Section 2.2, the MP2 and MP2XL utilize the same cells and battery modules.

Figure 6 Tray tested to UL 9540A module level testing.

4.2.1 Test Results

This simultaneous heating of six cells forced multiple cells to go into thermal runaway that propagated from the initiating cells to all the cells in the MP2/2XL tray. Once ignited, the MP2/2XL tray fire appears to be a slow-progressing thermal event that took approximately 30-35 minutes to burn itself out. Sparks and flying debris were observed during the test; however, there were no explosive discharges of gases. Products of combustion were collected in the hood and flammable gases were identified, as listed in Table 3. However, toxic gases sometimes associated with lithium-ion batteries, such as HF, HCL, and HCN, were not detected during the combustion of the MP2/2XL tray.

4.2.2 Key Takeaways

Key takeaways from the UL 9540A module level test include:

- Thermal runaway propagated from the initiating cells to all the cells in the MP2/2XL tray.
- The MP2/2XL tray fire appears to be a slow-progressing thermal event requiring over 30 minutes to burn itself out.
- Sparks and flying debris were observed, however, there were no explosive discharges of gases.
- Products of combustion were collected and were identified as flammable.
- Toxic gases sometimes associated with lithium-ion batteries, such as HF, HCL, and HCN, were not detected during the combustion of the MP2/2XL tray.

Table 3 UL 9540A Module Level Testing: Products of Combustion

Gas Name	Chemical Structure	Measurement Peak (ppm)
Carbon Monoxide	CO	205
Carbon Dioxide	CO2	6721
Methane	CH4	68.8
Acetylene	C2H2	17.1
Ethene	C2H4	Not Detected
Ethane	C2H6	Not Detected
Propane	C3H8	Not Detected
Butane	C3H4	Not Detected
Pentane	C3H6	Not Detected
Benzene	C6H6	9.0
Hexane	C7H14	Not Detected
Hydrofluoric Acid	HF	Not Detected
Hydrogen Chloride	HCL	Not Detected
Hydrogen Cyanide	HCN	Not Detected
Hydrogen	H2	446
Total Hydrocarbons	(Propane Equivalent)	247

4.2.3 Performance Criteria

UL 9540A, Section 8.4 outlines the performance criteria for the module level test. If all these conditions are met, further testing (such as unit or installation level tests) are not required. The acceptable performance criteria during the UL 9540A module level test are as follows:

1. Thermal runaway is contained by module design.
2. Cell vent gas is nonflammable as determined by the cell level test.

Given the cell vent gases are flammable (as summarized previously) and thermal runaway was not contained by the module design, UL 9540A unit level testing was required.

4.3 UL 9540A Unit Level Testing

The unit level fire test was conducted at the Northern Nevada Research Center on March 9, 2022, and was certified by TÜV. TÜV is an OSHA-approved NRTL and offers the cTÜVus mark, which is equivalent to other NRTL marks such as UL, ETL or CSA. Note, the MP2XL design is almost identical to the MP2 other than being greater in length to accommodate the additional battery modules. It uses the exact same cells, battery modules, and power electronics (i.e., all the same internal components) that the MP2 utilizes in its design. In addition, the design of the cabinet itself, enclosure strength, and fire safety features, such as the BMS, site controller, monitoring, electrical fault protections, and explosion control system are nearly identical for the two products.

After reviewing the MP2 unit level fire test results and comparing the MP2 and MP2XL products to one another, TÜV determined the MP2 UL 9540A unit level fire test results can be applied to the MP2XL and an additional UL 9540A unit level fire test for the MP2XL was not required for its listing. As such, given all these factors, a stand-alone MP2XL unit level fire test was not performed, nor required. Therefore, the UL 9540A unit level fire test results, described below for the MP2, can be applied to the MP2XL.

4.3.1 Test Unit

The test was performed on a fully populated MP2, consisting of nineteen battery modules, with a capacity of 3,100.8 kWh, tested at 100% SOC. Of all the MP2 variations, the unit tested during UL 9540A unit level testing is the largest capacity variation Tesla manufactures. In addition, during the test, the BMS and TMS are disabled; meaning, they are not actively operating to prevent thermal runaway in a cell or to prohibit the propagation of thermal runaway from cell to cell, or module to module. As such, the UL 9540A unit level fire test can be considered a worst-case fire scenario, where: (1) the unit tested was the largest variation in terms of energy capacity; (2) the unit tested was at the highest energy density possible (100% SOC); and (3) the BMS and TMS were disabled and, therefore, unable to actively respond to the thermal runaway condition. As such, any tests performed on a smaller capacity MP2, at a lower SOC, or on an operating MP2 (one with an active BMS and TMS) would be expected to perform similarly, if not better, than this worst-case scenario. Below is a summary of the UL 9540A unit level fire test results as well as a description of the performance of key fire safety features/systems during the test.

4.3.2 Test Setup

The test setup included all the required instrumentation and data collection as required by UL 9540A as well as some additional measurements that go beyond what is required. These additional measurements were collected to provide additional information to project designers, installers, a FCO, or an AHJ to assist in their design, installation, or review of a MP2XL installation.

4.3.3 Initiation

The initiating battery module was chosen to be the bottom battery module from Bay 7, in the middle battery tray, as shown in Figure 7.

Figure 7 Initiation location: Bay 7, bottom battery module within tray 2.

This location was deemed to be the worst-case, given there are battery trays directly above it and below it. In addition, by initiating in the bottom battery module, there are two additional battery modules installed directly above the initiation location. Within the battery tray itself, six interior cells were simultaneously heated via four film heaters, as shown in Figure 8. The heaters were programmed to provide a heating rate of 5°C (9°F) per minute, as specified by UL 9540A. The number of cells and the location were selected to provide the greatest thermal exposure to adjacent cells to ensure cell-to-cell propagation during the test. The objective of this initiation method is to simulate a mass failure of multiple cells in a localized area within the same battery module.

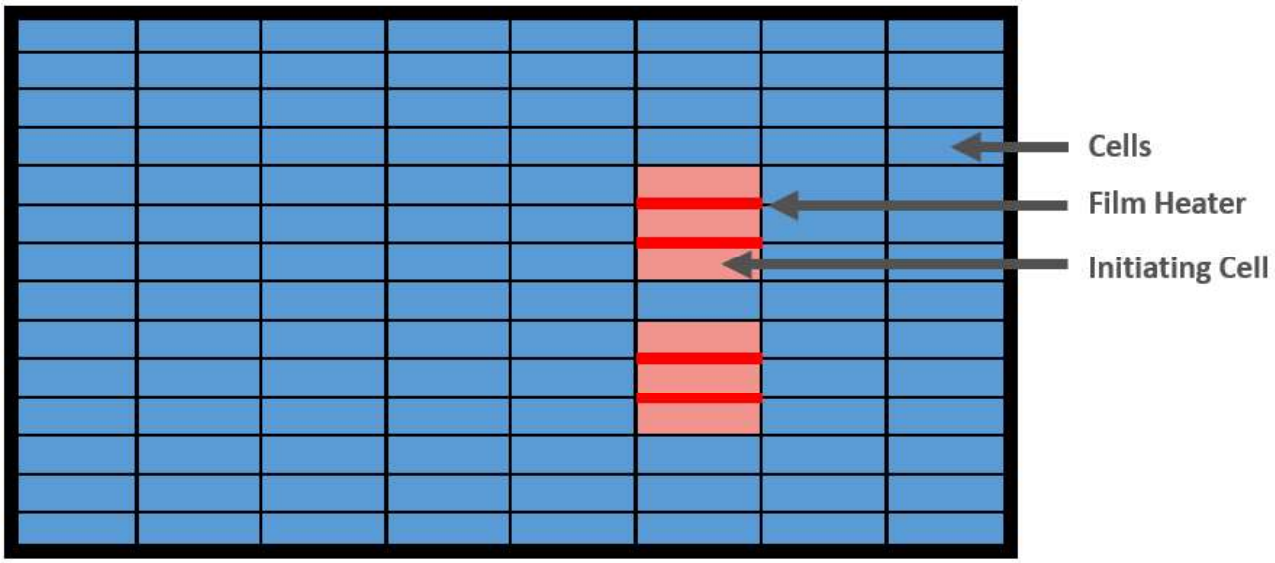

Figure 8 Film heater locations within the initiating tray (top view).

4.3.4 Instrumentation

Outside the initiating battery module and MP2 cabinet, three additional target MP2 cabinets were installed: (1) 6 inches (in) or 150 mm behind the initiating MP2; (2) 6 in (150 mm) to the side of the initiating MP2; and (3) 8 ft (2.44 m) in front the initiating MP2, as shown in Figure 9. The two target MP2 cabinets behind and to the side were populated with 100% SOC battery modules to simulate a multiple MP2 cabinet installation and to determine if thermal runaway and/or fire will propagate from one MP2 cabinet to adjacent cabinets at separation distances of 6 in (150 mm). Additionally, a combustible, instrumented wall (wood framing with plywood facing, painted black) was installed 5 ft (1.52 m) to the side of the initiating MP2 to demonstrate if fire could spread to a combustible surface (plywood wall) during the test.

Thermocouples were installed in the initiating battery module on the external surface of the initiating cells, inside the initiating MP2 cabinet, inside the target MP2 cabinets, on the instrumented wall, and on the exterior surfaces of all the MP2 target cabinets. Heat flux sensors were installed at distances of 3, 5, 8, 20, and 30 ft (0.91, 1.52, 2.44, 6.10, and 9.14 m) from the initiating MP2, as shown in Figure 9. Two external flame detectors and two thermal imagers were installed facing the initiating MP2 to demonstrate their functionality should flames exit the initiating MP2 during the test.

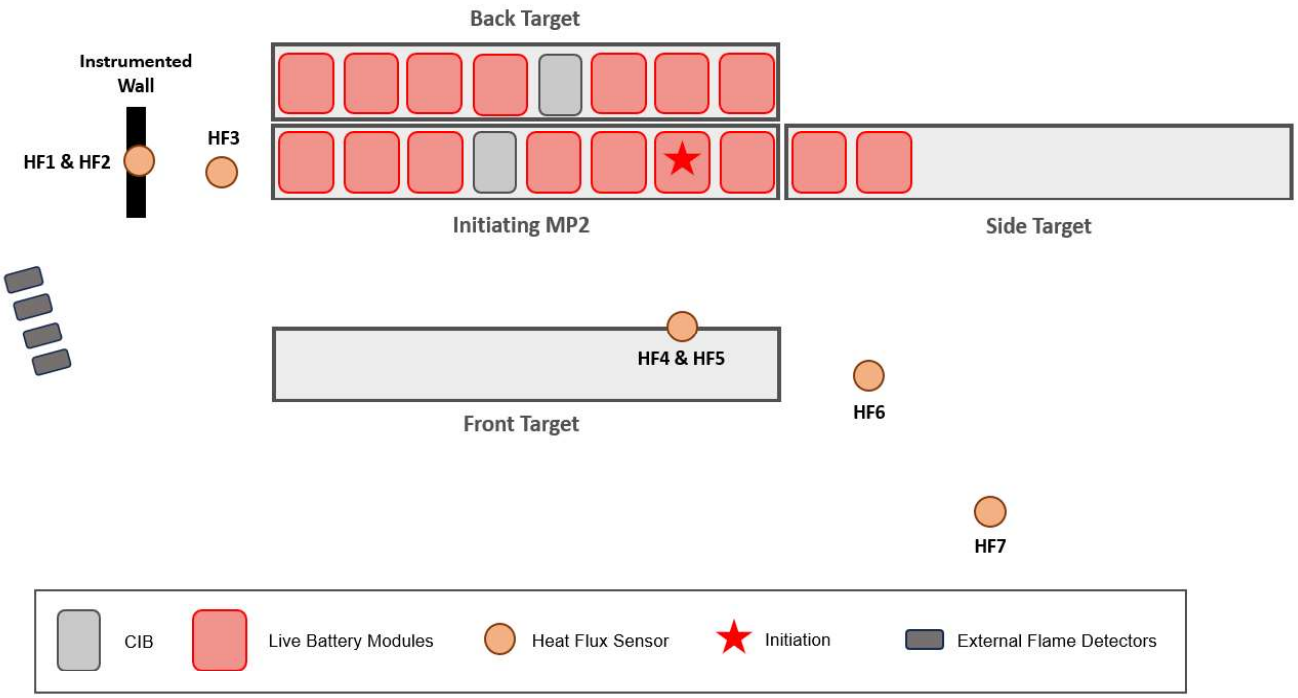

Figure 9 Instrumentation and target MP2 cabinet setup (top view).

4.3.5 Test Results

The test was performed starting around 11:30 am on March 9, 2022. The ambient temperature was between 50.5°F and 52.9°F. It was a sunny, clear day with no precipitation and a relative humidity between 14% and 19%. These outdoor environmental conditions meet the requirements of UL 9540A, Section 9.1.2. The cameras and instrumentation were turned ON at or around time 0:00:00 (hours: minutes: seconds) and the heaters within the initiating MP2 were turned ON at time 0:09:25. Six cells were heated simultaneously for over 1 hour and 18 minutes until the first initiation cell reached its thermal runaway temperature (as measured on the external surface of the cell via a thermocouple) of 239°C (462°F). Fifteen minutes later, the second group of initiating cells reached their thermal runaway temperature. Around 6 minutes later (approximately 1 hour 39 minutes into the test), light smoking/off-gassing was observed exiting the MP2 cabinet in the location where instrumentation was routed into the cabinet (i.e., where thermocouple/power wiring was in contact with the gasket that forms a tight seal for Bay 7's front door). Cell-to-cell propagation (thermal runaway spreading beyond the initial six cells being forcibly heated) was confirmed at approximately 1 hour 45 minutes when a seventh cell reached a temperature of 239°C (462°F). The heaters continued to run for an additional 5 minutes after this observation and then were turned off (at approximately 1 hour and 51 minutes into the test). Thermocouple temperatures inside the initiating MP2 subsided and no additional off-gassing, smoking, or cell thermal runaways were observed. By 2 hours and 30 minutes, the test ended. However, a period of observation and data collection continued for hours afterward to ensure the MP2 did not demonstrate any signs of distress. Table 4 provides a summary of key events from the UL 9540A unit level fire test of the MP2.

Table 4 UL 9540A Unit Level Testing: Timeline of Key Events

Elapsed Time hr:min:sec	Event
00:00:00	Start of Test. Cameras and Data acquisition system (DAQ) turned on.
0:09:25	Heaters ON.
1:18:18	First group of initiating cells reach thermal runaway temperature of 239°C (462°F).
1:33:38	Second group of initiating cells reach thermal runaway temperature of 239°C (462°F).
1:39:28	Smoke observed exiting out the bottom of the initiating MP2 cabinet's bay door where instrumentation was routed into the cabinet.
1:45:48	Confirmation of cell propagation to a 7th cell via internal thermocouple measurements.
1:51:09	Heaters turned OFF.
2:00:00	No additional smoke was observed from the initiating MP2 cabinet. Internal temperatures subside.
2:30:00	End of Test.
Post Test Overhaul	The initiating MP2 cabinet was observed for several hours afterwards and allowed to cool. No additional off-gassing, smoking, elevated temperatures, fire, thermal runaways, or signs of off-normal conditions were observed.

After 24 hours, the initiating MP2 showed no signs of abnormal conditions or distress since the test had concluded (no additional off-gassing, smoking, smells, thermal runaway, or flare-ups) and it was opened for inspection. Prior to opening the initiating MP2, handheld gas detection devices were utilized around the cabinets and did not detect the presence of flammable gases nor were flammable gases detected internally after the Bay 7 door was opened. A visual inspection of the initiating MP2 yielded the following observations:

- Seven cells had gone into thermal runaway: the six that were forcibly heated and one additional cell, as illustrated in Figure 10. This demonstrated that cell-to-cell propagation had occurred during the test, as is required by UL 9540A.

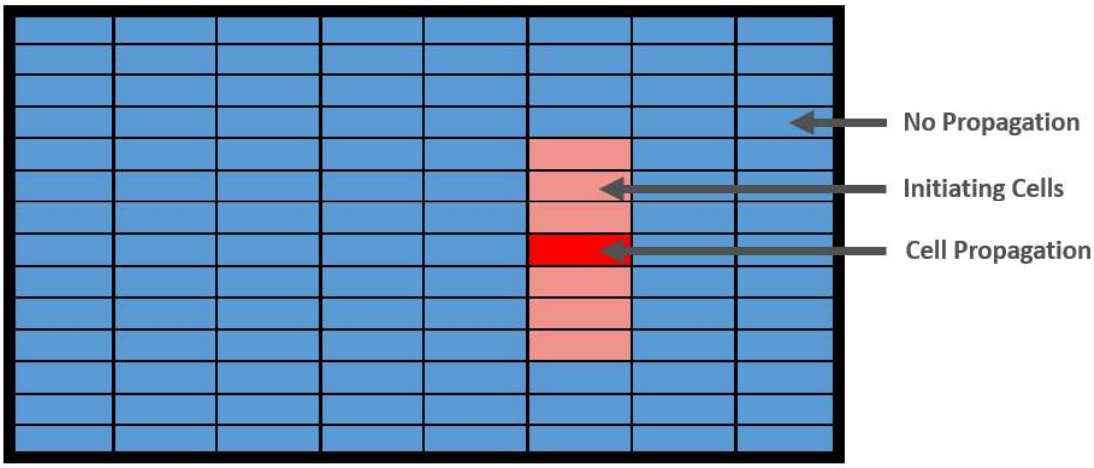

Figure 10 Cell propagation during UL 9540A unit level fire testing (top view).

- No other signs of distress were observed in the initiating battery module. Thermal runway had not propagated beyond the seven cells within Tray 2, nor had it spread to the tray above or below it within the battery module.
- Internal cell components were observed inside the initiating MP2 cabinet in the area of the initiating battery module and around Bay 7's front door; however, no free-flowing liquid or runoff was observed.
- The overpressure vents in Bay 7 had not opened, indicating that the internal pressure within Bay 7 did not see a significant rise during the failure of the seven cells.
- Visible clues of fire damage to surrounding components (plastics, electronics, etc.) were not observed. Based on this observation, it is likely that a sustained fire did not occur around the initiating battery module, even with the failure of seven cells occurring.
- The battery modules within the target MP2 cabinets installed 6 in (150 mm) behind and to the sides were also unaffected.

4.3.6 Fire Propagation

UL 9540A unit level fire testing of the MP2 demonstrated that an internal failure event causing thermal runaway of six cells nearly simultaneously will not propagate thermal runaway throughout the battery module. The nearly simultaneous failure resulted in thermal runaway propagating only to one additional cell and no further. The first group of initiating cells went into thermal runaway approximately 1-hour and 18 minutes into the test, as shown in Figure 11. This observation is based on internal thermocouple measurements installed on the surface of the cells within the initiating battery module.

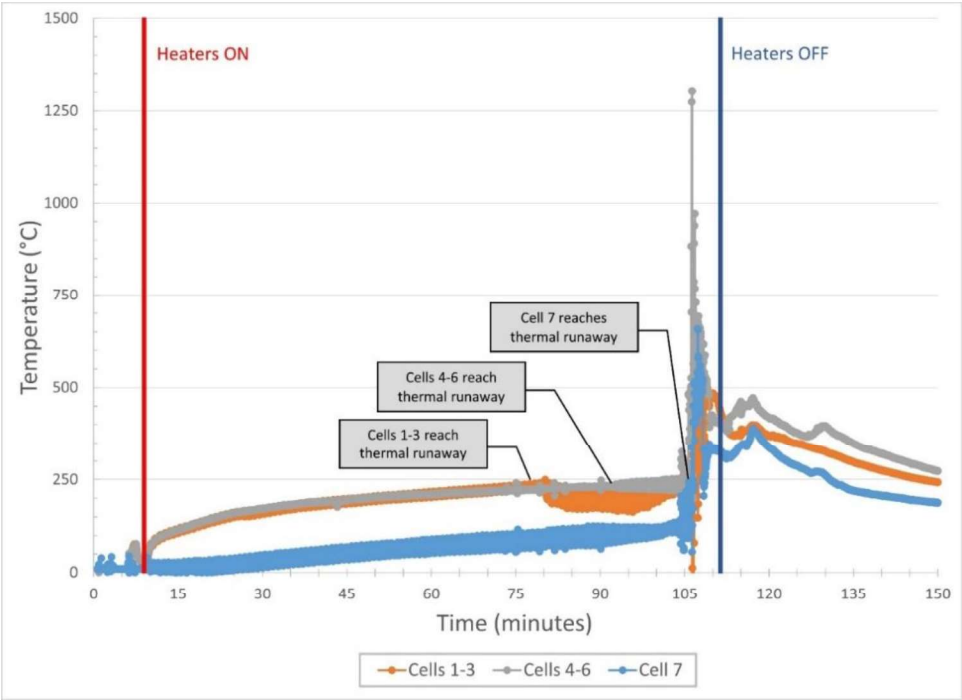

Figure 11 Cell surface temperatures recorded during UL 9540A unit level fire testing.

Fifteen minutes later the second group of initiating cells went into thermal runaway and cell-to-cell propagation was confirmed at approximately 1 hour 45 minutes when a seventh cell reached 239°C (462°F). Note, this result was with a disabled BMS and TMS (i.e., no safety protections were in place). Thermal runaway did not propagate beyond the seventh cell within Tray 2 of the initiating module, nor did it propagate to the battery modules installed above. In addition, thermal runaway did not propagate to the target MP2 cabinets installed 6 in (150 mm) behind and to the sides of the initiating MP2 cabinet. Lastly, no flaming was observed outside of the unit during the test.

4.3.7 Target Battery Module Surface Temperatures

As shown in Table 5, surface temperatures of battery modules within the target MP2 cabinets did not exceed 174°C (345°F), the temperature at which thermally initiated cell venting occurs (as determined during UL 9540A cell level testing).

Table 5 UL 9540A Unit Level Testing: Target Battery Module Surface Temperatures

Location	Maximum Battery Module Temperature Recorded	Ambient Temperature at the Start of Test	Cell Venting Temperature	Cell Thermal Runaway Temperature
Back Target Modules	13.8°C (56.4°F)	10.2°C (50.4°F)	174°C (345°F)	239°C (462°F)
Side Target Modules	13.2°C (55.8°F)	8.0°C (46.4°F)	174°C (345°F)	239°C (462°F)

These temperatures were recorded at the battery modules closest to the initiating battery module, as shown in Figure 12. As plotted in Figure 13, the internal temperature of the target battery modules gently rose throughout the 2½-hour test as the ambient, outdoor temperature also increased from 10.3°C to 11.6°C. These temperature measurements indicate the target battery modules were not affected by the thermal runaway of the seven cells within the initiating battery module.

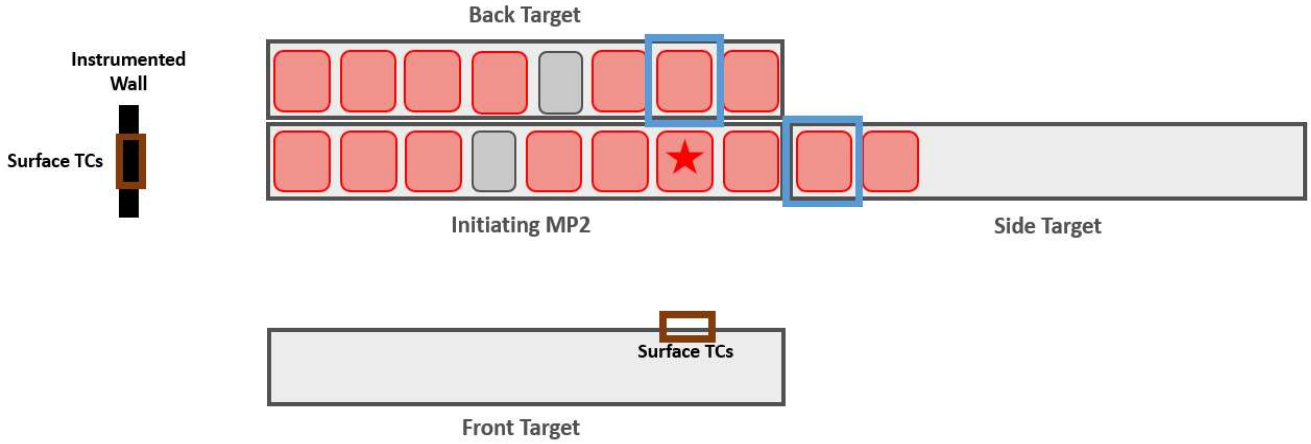

Figure 12 Temperature measurement locations: at side and back target battery modules (blue boxes) and the front target and instrumented wall surface temperatures (brown boxes).

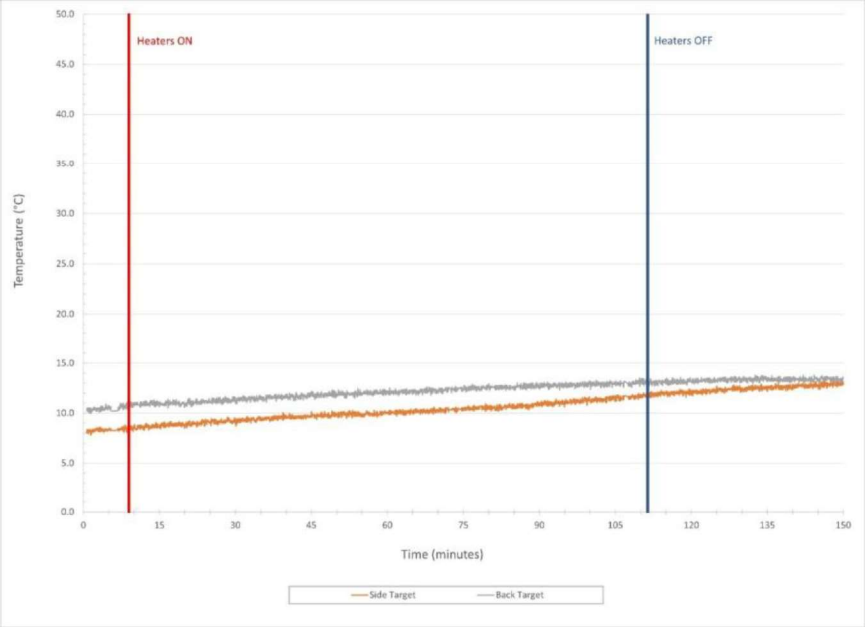

Figure 13 Side and back target battery module temperatures during UL 9540A unit level fire testing.

4.3.8 Exposure Surface Temperatures

As shown in Table 6, surface temperatures on exposures 5 ft (1.52 m) to the side (instrumented wall) and 8 ft (2.44 m) directly in front of the initiating MP2 cabinet (front target) did not exceed 97°C (175°F) above ambient.

Table 6 UL 9540A Unit Level Testing: Exposure Surface Temperatures

Location	Maximum Temperature Recorded	Ambient Temperature Recorded by the TC at the Start of Test	Temperature Rise Above Ambient
Front Target Surface	16.8°C (62.2°F)	11.3°C (52.3°F)	5.5°C (9.9°F)
Instrumented Wall Surface	25.9°C (78.6°F)	20.4°C (68.7°F)	5.5°C (9.9°F)

These temperatures were recorded directly in front of the initiating battery module and at the instrumented wall, as shown in Figure 12. The surface temperature of the front target gently rose throughout the 2½-hour test from a starting temperature of 11.3°C (52.3°F) to a maximum surface temperature of 16.8°C (62.2°F), as shown in Figure 14. Similarly, the 24 thermocouples installed on the instrumented wall also gently rose throughout the test and fluctuated slightly with the outdoor environmental conditions (i.e., wind blowing, sun exposure, increasing ambient temperatures), as shown in Figure 15. The maximum temperature measured on the instrumented wall was 25.9°C (78.6°F), which was a temperature rise of 5.5°C (9.9°F) above its ambient temperature at the start of the test. Note, the temperature rise above ambient can be attributed to the environmental conditions during the 2½-hour test and is not directly related to the thermal runaway of the seven cells within the initiating MP2. As these measurements are surface temperatures, the temperature rise within

the front target surface and the instrumented wall surface is predominantly due to the sun heating up those surfaces during the test (the test was run between 11 am and 1:30 pm on a mostly sunny day). These temperature measurements indicate an exposure surface 5 ft (1.52 m) to the side and adjacent MP2 cabinets 8 ft (2.44 m) in front, were not affected by the thermal runaway of the seven cells within the initiating battery module.

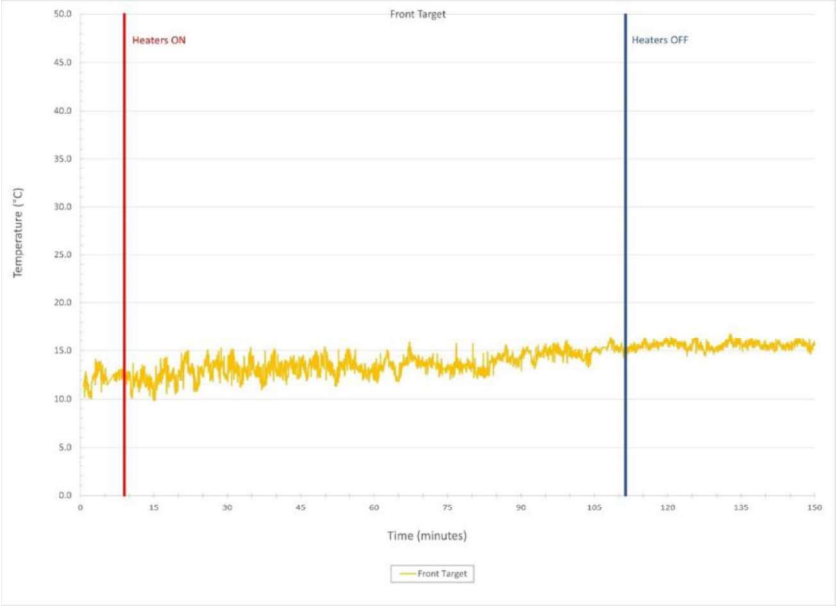

Figure 14 Front target external surface temperature 8 ft (2.44 m) directly in front of the initiating module.

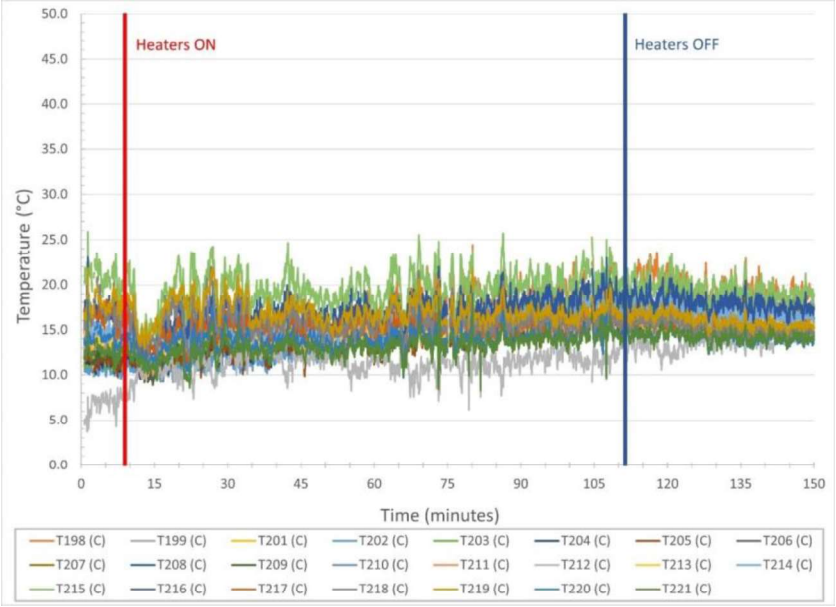

Figure 15 Instrumented wall surface temperatures during UL 9540A unit level fire testing.

Note: T200, the 24th thermocouple installed on the instrumented wall, did not work during testing, and was therefore removed from this plot as the measurements recorded were erroneous.

4.3.9 Heat Flux Measurements

Heat flux measurements were recorded throughout the UL 9540A unit level fire test at distances of 3, 5, 8, 20, and 30 ft (0.91, 1.52, 2.44, 6.10, and 9.14 m). Since flames did not occur outside the initiating MP2 cabinet, predictably, these measurements were essentially 0.00 kW/m^2 throughout the entire test, as summarized in Table 7 and plotted in Figure 16.

Table 7 UL 9540A Unit Level Testing: Maximum Recorded Heat Fluxes

Location	Maximum Heat Flux Recorded (W/m^2)
HF1	0.0000013
HF2	0.0000013
HF3	0.0000014
HF4	0.0000016
HF5	0.0000014
HF6	0.0000016
HF7	0.0000013

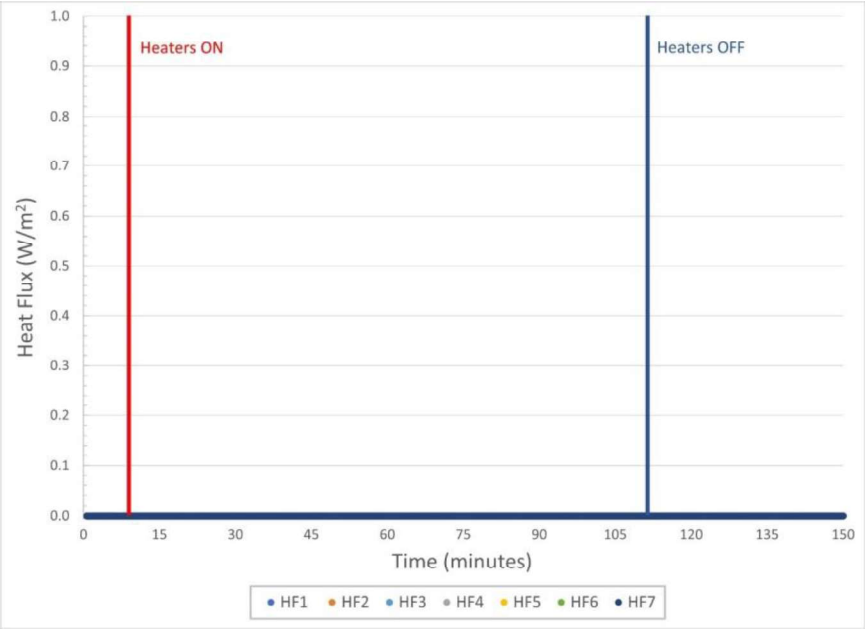

Figure 16 Heat flux measurements recorded during UL 9540A unit level fire testing.

The maximum heat flux recorded was 0.0000016 W/m^2, which was recorded at both the front target and at a distance of 20 ft from the initiating MP2. Note, these heat flux values, in W/m^2, are essentially reading no heat flux values at all, as would be expected given no flaming was observed outside the MP2 cabinet nor was the cabinet itself warmed enough to impose a heat flux on the sensors. These heat flux measurements indicate an exposure surface 3-5 ft (0.91-1.52 m) to the side, an adjacent MP2 cabinet 8 ft (2.44 m) in front, and other

exposures further away at 20-30 ft (6.10-9.14 m), were not affected by the thermal runaway of the seven cells within initiating battery module. Furthermore, the heat flux measurements in front of and to the side of the initiating MP2 cabinet did not exceed 1.3 kW/m^2 at any time during the test.

4.3.10 External Fire Detection System

The MP2 does not have an internal fire detection system or one that is integral to its design/construction. During the UL 9540A unit level fire test, two multi-spectrum IR flame detectors and two thermal imagers from differing manufacturers were installed pointing directly at the front and top of the initiating MP2 cabinet. None of the detectors were activated during the fire test. This result is expected, as no flames were observed during the test. However, previous testing by Tesla on the MP1 has demonstrated that multi-spectrum IR flame detectors can detect a fire should flames exit the cabinet through the thermal roof and can be incorporated into a site design, if required.

4.3.11 Fire Suppression System

The MP2 does not have an internal fire suppression system or one that is integral to its design/construction. The UL 9540A unit level test results demonstrate that a suppression system is not required to stop the spread of fire from cell to cell, module to module, or MP2 cabinet to cabinet when a near-simultaneous failure of up to six cells occurs within the same battery module.

The UL 9540A unit level fire test also demonstrated that manual fire suppression (hose lines) is not required to stop the spread of fire from a MP2 cabinet to adjacent MP2 cabinets installed 6 in (150 mm) behind and to the sides when a near-simultaneous failure of up to six cells occurs within the same battery module.

4.3.12 Explosion Control

UL 9540A unit level fire testing of the MP2 demonstrated that a failure event causing the near-simultaneous thermal runaway of six cells will not cause a deflagration. During the test, pressure transducers were installed within the battery module bay to monitor overpressures within the MP2 cabinet. After the test, no pressure spikes were observed in the data, indicating no sudden increases in pressure, consistent with a deflagration, occurred within the MP2 cabinet during the UL 9540A unit level test. In addition, the overpressure vents did not open, the MP2 cabinet doors were not forced open, nor did the MP2 cabinet fail to hold containment. Meaning, no visual indications of an overpressure event occurring inside the MP2 cabinet were observed. Light smoking/off-gassing (i.e., not a pressurized discharge or deflagration) did escape the initiating MP2 during the test, likely through pathways created by the required instrumentation (thermocouples, film heaters, etc.) for the test; however, explosion hazards, including but not limited to, observations of a deflagration, projectiles, flying debris, detonation, hazardous pressure waves, shrapnel, or other explosive discharge of gases, were not observed.

4.3.13 Runoff/Products of Combustion

UL 9540A unit level fire testing does not require the collection of runoff or products of combustion as part of an outdoor installation test. However, during the unit level test, and afterwards during cleanup, no liquid runoff

(such as the water-glycol solution from the TMS) was observed. Internal cell components were observed after the test on the interior of the cabinet around the Bay 7 door, as would be expected after the failure of seven cells. However, no free-flowing liquid, or runoff was observed once the MP2 doors were opened. If necessary, should a failure event occur, internal cell components/electrolytes can be disposed of in an appropriate manner as specified by Tesla's ERG and Safety Data Sheets (SDS).

4.3.14 Performance Criteria

UL 9540A, Table 9.1 outlines the performance criteria for outdoor, ground-mounted BESS. If all these conditions are met, further testing (such as installation-level testing) is not required. The performance criteria during the UL 9540A unit level fire test is as follows:

1. No flaming observed outside of the unit.
2. Surface temperatures of battery modules within the targets adjacent to the initiating unit cannot exceed the temperature at which thermally initiated cell venting occurs.
3. Surface temperatures on exposures 5 ft (1.52 m) to the side and 8 ft (2.44 m) in front of the initiating unit cannot exceed 97°C (175°F) above ambient.
4. No explosion hazards, including but not limited to, observations of a deflagration, projectiles, flying debris, detonation, or other explosive discharge of gases observed.
5. Heat flux in the center of the accessible means of egress cannot exceed 1.3 kW/m^2.

As described above, no flaming was observed outside the MP2 cabinet during the unit level test. In addition, surface temperatures of the battery modules within the targets were below the temperature at which cell venting occurs (174°C or 345°F), and external surface temperatures on exposures 5 and 8 ft (1.52 and 2.44 m) away did not exceed 97°C (175°F) above ambient. Lastly, no explosion hazards were observed, and all heat fluxes remained below 1.3 kW/m^2. Based on the above UL 9540A unit level fire test results, the MP2 meets all five of the above performance criteria. By meeting the unit level performance criteria, UL 9540A installation-level testing is not required for a MP2 installation.

5. CONCLUSIONS

Based on our review of the available materials, our background, experience and training, and the analysis performed to date described above, the following conclusions are submitted within a reasonable degree of scientific and engineering certainty:

1. The MP2XL is listed to all product design standards (such as UL and IEC) required of a BESS and has been tested to UL 9540A at the cell, module, and unit level.
2. Cell and module level UL 9540A testing demonstrated that the venting and combustion of the MP2XL cells release flammable gases that are commonly detected in a vented lithium-ion cell; however, they do not release toxic gases sometimes associated with the failure of lithium-ion batteries, such as HCN, HCL, and HF.
3. The largest variant of the MP2, a 3,100.8-kWh unit, was tested at a worst-case scenario (i.e., 100% SOC with the BMS and TMS disabled) to the UL 9540A unit level fire test method where six cells within the same battery module were forced into thermal runaway.
4. The MP2XL design is almost identical to the MP2 other than being greater in length to accommodate the additional battery modules. It uses the exact same cells, battery modules, and power electronics (i.e., all the same internal components) that the MP2 utilizes in its design. In addition, the design of the cabinet itself, enclosure strength, and fire safety features, such as the BMS, site controller, monitoring, electrical fault protections, and explosion control system are nearly identical for the two products. As such, TÜV determined the MP2 UL 9540A unit level fire test results summarized below can be applied to the MP2XL.
5. The performance criteria outlined in UL 9540A, Table 9.1 for outdoor, ground-mounted BESS were all met during the unit level test. Specifically, the performance criteria results were:
    a. No flaming was observed outside of the unit.
    b. Surface temperatures of battery modules within the target MP2 cabinets adjacent to the initiating MP2 cabinet did not exceed the temperature at which thermally initiated cell venting occurs. The maximum temperatures recorded at the battery modules of the adjacent MP2 cabinets were 13.8°C (56.4°F) and 13.2°C (55.8°F). These temperatures are significantly below the temperature at which cell venting occurs (174°C or 345°F).
    c. Surface temperatures on exposures 5 ft (1.52 m) to the side and 8 ft (2.44 m) in front of the initiating MP2 cabinet did not exceed 97°C (175°F) above ambient. The maximum external surface temperatures recorded at the instrumented wall 5 ft (1.52 m) to the side was 25.9°C (78.6°F) with a temperature rise above ambient of 5.5°C (9.9°F). The maximum external surface temperatures recorded at the front target 8 ft (2.44 m) directly in front of the initiating MP2 was 16.8°C (62.2°F) with a temperature rise above ambient of 5.5°C (9.9°F). These temperatures are significantly below the maximum permitted temperature rise above ambient of 97°C (175°F).
    d. Explosion hazards, including but not limited to, observations of a deflagration, projectiles, flying debris, detonation, or other explosive discharge of gases were not observed.
    e. Heat flux measurements did not exceed 1.3 kW/m^2. The maximum heat flux recorded was 0.0000016 W/m^2, which was the sensor installed on the front target MP2 cabinet and was the ambient heat flux the sensor was exposed to throughout the test.

6. Based on a review of the MP2XL, its fire safety features, and the UL 9540A unit level fire test results, the MP2XL meets or exceeds all the performance criteria of UL 9540A, Table 9.1 and UL 9540A installation level testing is not required for a MP2XL installation.
7. None of the external fire detectors activated during the UL 9540A unit level fire test (two multi-spectrum IR flame detectors and two thermal imagers). This result is expected, as no flaming was observed outside of the cabinet during the test; however, previous testing by Tesla on the MP1 has demonstrated that multi-spectrum IR flame detectors can detect a fire should flames exit the cabinet through the thermal roof.
8. An integral fire suppression system or an external fire suppression system is not required to stop the spread of fire from cell to cell, module to module, or MP2XL cabinet to cabinet when a near-simultaneous failure of up to six cells occurs within the same battery module.
9. Manual fire suppression (hose lines) is not required to stop the spread of fire from a MP2XL cabinet to adjacent MP2XL cabinets installed 6 in (150 mm) behind and to the sides when a near-simultaneous failure of up to six cells occurs within the same battery module.
10. Based on a review of the MP2XL, its fire safety features, and the UL 9540A test results, the MP2XL can meet or exceed all the installation level codes and standards, such as the IFC and NFPA 855, required for outdoor, ground mounted BESS installations when installed in accordance with the MP2XL DIM.

6. REVISION CONTROL SHEET

Date	Revision	Reason for Issue	Developed By	Reviewed By	Approved By
04/03/2024	Rev0	Initial Report	AFB	BA	NLR

Revision	Section	Changed Noted