



DEPARTMENT OF ADMINISTRATIVE SERVICES

PROPOSED CHANGE OF THE CONNECTICUT STATE BUILDING CODE AND FIRE SAFETY CODE

DATE SUBMITTED: 7/22/2024

CODE INFORMATION

Proposed change to: [X] Building Code [] Fire Safety Code
Code section(s): IRC R324.6.4 (of the 2022 CSBC, anticipated to be R329.6.3 of the 2025 CSBC)

PROPONENT INFORMATION

Name: Chris Worley Representing: Sunrun LLC
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Address: Street Address Town State Zip Code

PROPOSAL INFORMATION

Description of change and reason for change (attach additional information as needed):
Allow exemptions to R324.6.4 (roof access) when approved by the Building and Fire Code Office
Proposed text change, addition or deletion (attach additional information as needed):
"Exception: Other roof access configurations shall be permitted when approved by the Building
Supporting data and documents (attach additional information as needed)
See attached

- [X] This Proposal is original material. (Note: Original material is considered to be the submitter's own idea based on or as a result of his/her own experience, thought or research and, to the best of his/her knowledge, is not copied from another source.)
[] This Comment is not original material, its source (if known) is as follows: (such as material / code development proposal from a prior development cycle or proposal submitted to model code committee etc.)
[] I would like to make an in-person presentation of my proposal.

Release

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PropONENT'S Signature (with handwritten signature)

Chris Worley
Printed Name

PLEASE EMAIL (PREFERRED) TO DAS.CodesStandards@CT.GOV OR MAIL OR FAX (SEE BELOW)

Department of Administrative Services
Office of the State Building Inspector
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Affirmative Action/Equal Opportunity Employer

July 22, 2024

Department of Administrative Services
Office of the State Building Inspector
450 Columbus Boulevard, Suite 1303
Hartford, CT 06103

To Whom It May Concern,

This letter contains supporting information for Sunrun’s proposed change of the Connecticut State Building Code. Sunrun proposes a small amendment to Connecticut’s State Building Code, specifically section R324.6.4 of the 2022 CSBC. It should be noted that R324.6.4 was added by Connecticut and this amendment is to address an anticipated, similar amendment by Connecticut into the 2025 CSBC. Such an amendment would likely be to R329.6.3). We recommend adding “Exception: Other roof access configurations shall be permitted when approved by the Building Code Official and Fire Code Official.”

Every residential building is different and fire departments will approach a fire scenario based on their abilities. We have seen hesitancy for officials to use language within Chapter 1 to approve alternative designs (i.e., using R104.11 on Alternative Materials, Design and Methods of Construction and Equipment).

In some cases, Sunrun has received approval for system designs, installed the system, but then the system fails inspection due to a narrow reading of R324.6.4. In some cases, this has necessitated the removal of the system to the disappointment of the homeowner and at great expense Sunrun.

The intent of the proposed addition is to maintain the prescriptive language but give an explicit ability for the local municipality to approve project specific configurations.

Please don't hesitate to reach out to me if you have any questions.

Sincerely,

Christopher Worley
Sr. Director, Policy
christopher.worley@sunrun.com