

From: Ken Garber
To: Planning
Subject: 315 W. Huron PUD supplemental regulations
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To the planning commission:

I'm writing about the 315 W. Huron PUD and site plan on your June 2 meeting agenda. Section 4C of the proposed supplemental regulations reads as follows:

"All buildings in the development are all-electric, meaning powered by electricity as the only source of energy for all on-site space conditioning (including heating and cooling), water heating, cooking appliances, and clothes drying appliances, **except for backup power sources to power life safety systems in compliance with applicable building codes and other laws.**" [My emphasis.]

The language on backup power sources should be reconsidered. I have been looking into the Michigan building code, the National Electrical Code (NEC), and National Fire Protection Association (NFPA) guidance documents, and while I do not claim expert knowledge (and am happy to be proven wrong), it does not appear to me that fossil fuel-powered backup systems, including generators, are required for life safety systems under these codes. Here's what I've learned:

1. On generators, Chapter 9 of the Michigan Building Code (Fire Protection and Life Safety Systems), defaults to NFPA 20.
2. NFPA 20, "Standard for the Installation of Stationary Pumps for Fire Protection," requires a backup generator for electric fire pumps if the primary utility source is deemed unreliable. (I think pretty much all of Ann Arbor meets this utility unreliability standard.) The generator must meet NFPA 110 Level 1 and Type 10 standards. Level 1 means the failure of the system could result in loss of human life or serious injury. A type 10 classification requires an Emergency Power Supply System (EPSS) to restore acceptable electrical power to essential loads within ten seconds of a primary power failure.
3. NFPA 101, Life Safety Code, also defaults to the NFPA 110 requirements.
4. NFPA 110 covers installation, operation, maintenance and testing for the EPSS, not just for life safety systems but separately for "emergency systems" and "standby systems." **Nowhere (to my knowledge) does NFPA 110 dictate the fuel source for the electric generators needed to power these systems. It only sets performance-based standards.** NFPA 110 explicitly includes battery specifications in addition to those for fossil fuel powered generators (and for fuel cells, incidentally). Batteries must be of certain chemistries, and the battery-powered generator must be capable of running for a certain number of hours, depending in whether it's EPSS level 1 (failure could result in death or injury) or level 2 (less critical situations but longer duration).

So do we really need to write an exception from all-electric construction for life safety systems into the supplemental regulations for the 315 West Huron PUD? Only if current battery-powered generator systems cannot meet the NFPA 110 performance standards for

this building. I believe they can (and therefore we can require a 100 percent all-electric 315 W. Huron, including backup power) but this will require further investigation. In the meantime we should amend section 4C of the supplemental regs to read as follows:

“... except for backup power sources to power life safety systems AS REQUIRED BY applicable building codes and other laws.”

That’s because the current language, “in compliance with applicable building codes and other laws,” adds nothing, since all building systems must already comply with code, and this wording allows fossil fuels at the owner’s discretion. If we are going to carve out an exception, it should be because code requires it--not because code simply allows it. So please consider making this small wording change to the 315 W. Huron supplemental regulations to only allow an exception to all-electric when it’s required, not just when it complies.

Thank you for considering this suggestion.

Best regards,
Ken Garber
28 Haverhill Ct