



**Informal Interpretation Report  
Number 6595**



**Date** August 19, 2010

**Edition** 2007

**Section** 1006.2.3

**Question:**

Is it the intent of Florida Building Code - Building Section 1006.2.3 to require means of egress lighting to be equipped with battery back-up even when the means of egress lighting is powered by two completely separate and circuited power sources, one being utility supplied power and the other an emergency generator?

**Answer**

It depends. Please see the attached commentary.

**Commentary:**

The question does not state if this is a legally required system or not. It appears to state an emergency "system" is installed with completely separate wiring systems with no connection to each other and yet does not state if an automatic transfer switch is installed or if the generator will pick up any loads within the required 10 seconds. Other issues may also need to be addressed, including occupancy and load. An emergency power system is generally designed and supplied by both normal and generator power. In some cases, it is relay controlled to transfer power from a normal source to an emergency source using a transfer switch. If normal power is lost, a generator will feed the emergency system through the automatic transfer switch. The code does not generally intend to require three different sources of power. Additionally, a DEC statement that was issued by the State Fire Marshal a few years ago specifically allows this condition in a specific case. Further, if half the lights are on "normal" power and half are on "emergency," no one manual act could leave the path of egress in darkness, because the distributions are separate all the way to the source of supply. If the source

of supply fails, the generator kicks in. While the question is based in the building volume, careful reading of the documentation indicates the NEC allows an alternate (second) power source from the utility if it is deemed reliable. If only the standard utility source is used, a battery backup system would be required. If a generator capable of picking up the load within 10 seconds and tested in accordance with the governing documents is used, the code allows that as it is not depending on the power company. The building code commentary provides reference to the utility and NEC requirements and the commentary does not disallow the generator.

---

**Notice:**

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.