

Witness: Shawn Morris

Date Filed: December 22, 2025

Question:

EFSB-S-5 Refer to Exh. MS-C at 6. Provide a copy of the reference materials listed. If the Tesla Megapack 2 documentation differs from that of the Tesla Megapack 2XL, provide the Tesla Megapack 2XL documentation. If there is not unique documentation for the Tesla Megapack 2XL, please explain why the Tesla Megapack 2 documentation applies to both models.

Response:

The reference materials are manufacturer-provided technical and safety documents applicable to the Tesla Megapack platform. Tesla does not maintain a wholly separate set of fire safety, hazard mitigation, or emergency response documentation for the Megapack 2XL distinct from the Megapack 2 where the underlying cell chemistry, module architecture, safety features, and operating principles are the same. The Megapack 2XL represents a scaled configuration of the Megapack 2 that increases total energy capacity through modular integration, rather than through a change in battery technology or fundamental safety design.

Accordingly, the Tesla Megapack 2 documentation referenced applies to both the Megapack 2 and Megapack 2XL because it addresses the same cell design, thermal runaway characteristics, deflagration control features, gas venting approach, monitoring philosophy, and system-level safety concepts. Where dimensional or capacity differences exist, those differences are addressed through site-specific design, spacing, and hazard mitigation analyses rather than through separate manufacturer safety documentation. For this project, the applicability of the Megapack 2 documentation to the Megapack 2XL is evaluated and confirmed through the Fire Protection Engineering Analysis and the site-specific Hazard Mitigation Analysis, which account for the larger unit size and layout while relying on the same validated safety principles and test data.