



TO: Development Services Customers

SUBJECT: **INFORMATION BULLETIN 250**
Requirements for Third Party Plan Review and Inspection of Back-up
Systems for One- and Two-Family Dwellings

DATE: November 1, 2025

CREATED BY: Inspections

ATTACHMENTS: Third-Party Review Declaration of Compliance and Liability
Third-Party Inspection Declaration of Compliance and Liability
Third Party Inspection/Review Hold Harmless and Indemnity Agreement

Purpose:

As a customer service initiative, the Development Services Department has created this Information Bulletin to provide the requirements for third party plan review and inspection of electrical back-up systems for one- and two- family dwellings.

Scope:

Effective September 1, 2025, Texas Senate Bill 1202 (89-R) qualified third-party professionals may perform plan review and inspections for home backup power systems.

Definitions:

Applicable Codes:

2023 National Electric Code	2024 International Residential Code
2024 International Fire Code	2024 International Mechanical Code
2024 International Plumbing Code	2024 International Existing Building Code

City of San Antonio Chapter 10, Building Related Codes:

[City of San Antonio Ordinance Chapter 10](#)

Unified Development Code:

[City of San Antonio UDC Ordinance Chapter 35](#)

2021 CPS Energy Electric Service Standards:

https://www.cpsenergy.com/content/dam/corporate/en/Documents/Electric_Service_Standards.pdf,

Home Backup Power Installation: Electric generating, energy storage system, a standby system, and any associated infrastructure and equipment intended to provide electrical power to a one- or two-family dwelling, regardless of whether the facility or system is capable of participating in a wholesale electric market, that is connected at 600 volts or less. For the purposes of the bill, the following systems are eligible as backup power systems:

- Generators and associated transfer switches.
- Energy Storage Systems (ESS) and associated equipment.
- Solar PV systems that include ESS, installed simultaneously.

The following are not considered Home Backup Power Installations and are not eligible for third party review or inspection:

- Solar Photovoltaic (PV) systems that do not include Energy Storage System (ESS) installations. For installation of these systems, please see Information Bulletin 153 Requirements for Solar Photovoltaic Systems (PV) (Commercial/Residential). [IB 153 Photovoltaic Requirements](#)
- Fuel gas connections and piping. For plumbing permit application, please see: [Plumbing Gas & Sewer Permit Application](#)
- Electric service and/or panelboard repairs, replacements, upgrades, etc. For electrical permit application, please see: [Electrical Permit Application](#)
- The installation, replacement, or extension of feeders and/or branch circuits, except those associated with and necessary for the back-up system.
- Installation of outlets, circuiting, overcurrent devices, etc. for electric vehicles.

City Public Service (CPS Energy): Local, municipality-owned utility. No other utilities serve the City of San Antonio.

- Please see CPS Energy Electric Service Standards Article 2000-Distributed Generation.
- For information on CPS Energy Distributed Generation, please see: <https://www.cpsenergy.com/content/corporate/en/construction-and-renovation/distributed-generation.html-and-renovation/distributedgeneration.html>
- For their Distributed Generation (DG), please see: <https://www.cpsenergy.com/content/dam/corporate/en/Documents/Distributed%20Generation%20Manual.pdf>

Independent Electrical Contractor: An electrical contracting business who has no affiliation with the Third-Party Professionals performing the plan review and electrical inspection of the project. The business must hold a Texas Electrical Contractor's License and a Texas Master Electrician's license, issued by TDLR, with up-to-date licenses and registered with the City of San Antonio Development Services Department (DSD). For information on DSD registration, please see <https://www.sa.gov/Directory/Departments/DSD/Contractor/Electrical>

Texas Department of Licensing and Regulation (TDLR): Texas Licensing Board. For information on TDLR Electrical Licensing, please see <https://www.tdlr.texas.gov/electricians/>

Third Party Professionals (must be independent of the installing electrical contractor):

- A Master Electrician as described by Texas Occupations Code 1305.153, licensed under Subchapter D, Chapter 1305.
- An Electrical Inspector as defined by Texas Occupations Code Section 1305.002.
- An Engineer, licensed under Texas Occupations Code, Chapter 1001.

Procedure for Third Party Plan Review and obtaining permit:

The independent Third-Party Professional will perform their plan review and once they have assured compliance with all applicable codes, will forward the **complete plan set** and the attached signed **Third-Party Review Declaration of Compliance and Liability** to the independent electrical contractor performing the work. Projects that have third party review shall have third-party inspections. The electrical contractor may submit to CPS Energy and for permit with the City of San Antonio Development Services Department simultaneously, however it is preferred to have the CPS Energy approval first.

CPS Energy process:

- The independent electrical contractor will submit the complete package to CPS Energy. The CPS Energy process is outlined below:

DG systems typically generate from five kilowatts (5 kW), the approximate demand for a small home, up to 10 megawatts (10 MW), which can power large commercial or industrial installations. They can be connected directly to your electrical system or interconnected into CPS Energy's electric distribution system.

To install a DG system:

- *Your home or business must comply with all CPS Energy installation requirements, which are found in the Distributed Generation Manual.*
- *You must complete and submit a DG Application (found as Appendix D in the DG Manual).*
- *You must submit an electrical one-line diagram, a site plan reflecting existing and new electric service equipment, and an elevation drawing.*

Once you've completed the materials:

- *The DG Application and associated documents must be emailed, in PDF format, to cpsesolar@cpsenergy.com for review.*
- *The DG Back-Up Generator Application and associated documents must be emailed, in PDF format, to DG@cpsenergy.com for review.*

City of San Antonio Development Services process:

- An electronic application and pdf document submittal for backup systems is available online at the BuildSA Customer Portal:

[San Antonio BuildSA Customer Portal](#)

- A Solar application is a subtype of the general-electric permit. For any back-up system installation, please select a type SOLAR permit. The application is located under the building module tab in the customer portal. This type of permit will allow the applicant to upload the required documents.

Electrical Permit Type * If you are requesting a permit for an Electrical Generator, please select Solar – Photovoltaic Permit
Solar - Photovoltaic Permit ▼

- Apply on-line by filling out the electronic application, which includes the address, contact information, and questions related to the backup system electrical work. Payment of the fee is part of the application process. You will receive a payment receipt by e-mail. The \$100 plan review charge will not be assessed on third-party professional reviewed submittals.
- The fee is based on the line items selected on the permit application. The Basic Inspection Fee is \$50. If an outage by CPS Energy is required, please select Work with CPS (\$2.15).
- After completion of the permit application, you will receive an application number and may then upload PDF files of the complete drawings and all documents as outlined below, through the online BuildSA Customer Portal. If uploading later, you may open the application record and upload to the Plan Room once logged into the portal.
- Documents required to be uploaded are: (forms attached to this IB)
 - ☐ The complete plan set approved by the Third-Party Professional
 - ☐ Third-Party Review Declaration of Compliance and Liability
 - ☐ Third Party Inspection/Review Hold Harmless and Indemnity Agreement
- Upon completion of the review of the **Third-Party Review Declaration of Compliance and Liability** and the **Third-Party Inspection/Review Hold Harmless and Indemnity Agreement**, notification of the result is sent back to the customer by e-mail and status available through the BuildSA Customer Portal. (Note: The complete plan set is not reviewed but is retained as part of the public record) The customer may receive an e-mail that there are issues to address due to a missing document or incorrect document uploaded. If revisions to the documents are required, the applicant will make any necessary corrections and re-upload PDF files to DSD via the BuildSA Customer Portal for further review. Customers are required to record a response to each document issue prior to uploading revised PDF documents. Any revised file should contain all the information supplied in the original plus indications of corrections made. This will occur within the two (2) business days mandated by SB1202.
- On occasion, due to zoning, certain addresses may require reviews by the Office of Historic Preservation or Public Works Stormwater department. The application will automatically be assigned to reviewers in those departments. Additional documents may be required to obtain

a Historic Certificate of Appropriateness, or Stormwater approval. Applications requiring these reviews will be permitted to exceed the two (2) business days mandated by SB1202.

- Upon further document review and approval, a Permit record will be created with a different record number than the application. The permit record contains all inspections. Work may start only after a full permit has been issued.
- Once all work has been completed, the Third-Party Professional shall complete all inspections applicable to the backup system. When the professional is satisfied that the installation meets all applicable codes, they shall complete the attached **Third-Party Inspection Declaration of Compliance and Liability** and shall upload it to the permit through the BuildSA Customer Portal. The DSD electrical inspector will review the submitted information and clear the inspections to ensure that a release is sent to CPS Energy for commissioning.
- The backup system may not be used until all required inspections have been completed, including those performed by the Third-Party Professional and those required to be performed by COSA DSD inspectors, such as service replacements or upgrades and gas inspections for natural gas generators.

Electronic plans package requirements:

Cover sheet:

- Plans shall be prepared and signed/sealed by either a licensed master electrician or a registered Texas Engineer. If prepared by an engineer, all sheets shall include a signed and dated engineer's seal.
- Index of plans
- Code Analysis
- Address and legal description of the property.

Dimensioned Site Plan providing the location of:

- Existing structures on the property.
- Location of any newly proposed structures.
- Provide set back locations and dimensions to property lines and internal lot lines.
- Location of any proposed generators, ESS equipment, bollards, and other required protection for ESS equipment.
- Main Electrical Service elevation showing location of existing equipment (electrical, foreign, etc.) and proposed equipment, including transfer switches, revenue meters, distribution generation meter, service disconnect or panel, inverters, and other equipment. Note: A 36" diagonal clearance is required from the gas meter to any electrical equipment, including receptacles. Service replacements and upgrades of services originally mounted over the gas meter will require relocation.
- For solar PV systems installed along with ESS equipment or batteries, the location of the following equipment shall be indicated:
 - Rapid Shutdown Equipment (optimizers, micro inverters, "birdhouse", etc.)
 - Conduits and combiner boxes - Inverters and Disconnect(s)

- ☐ Modules/Panels
- ☐ Listed Mounting System
- ☐ Other types of equipment or systems not listed above.
- Building components for solar PV systems installed along with ESS equipment or batteries.

Roof Plan providing:

- Array layout.
- Roof covering, type and number of overlays, type of roof deck.
- Rafter or beam sizes, spacing and roof slope.
- Plumbing, mechanical, attic vent terminals located on roof.
- Show dimensioned measurements for clearance for fire fighter access as required by the 2024 International Residential Code Section R329.6 and International Fire Code Sections 1205.2 and 1205.3.
- Ground mounted PV arrays are not subject to setback requirements and shall maintain a clear brush free area of 10 feet.
- Listed and labeled array/panel fastening method.
- Provide fastening specification sheets from the manufacturer or an engineered design for anchorage and support of the array panels to the roof structure.
- Method of sealing roof penetrations
- Building components for ESS equipment or batteries (in accordance with 2024 International Residential Code Section R330):
 - Installed in detached garage, attached garage, outdoors, or in utility closets, basements, storage, or utility areas.
 - ☐ If installed outdoors, show dimensioned clearances from windows and doors.
 - ☐ If installed indoors, show ratings of doors and openings leading into the residence, as well as the type of wall covering in the areas where ESS equipment is installed.
 - ☐ Show rating of any wall penetration protection.
 - ☐ Show location and type of any vehicle impact protection, and installation method for same.
- One-and two-family dwellings shall require structural engineering calculations from an engineer licensed in the State of Texas for roof-mounted array systems where any of the following occur:
 - ☐ Weighing more than six (6) lbs. per sq. ft, when installed on roofs with slopes of less than 4:12.
 - ☐ For flat roofs or with slope equal to, or less than, 2 units vertical and 12 units horizontal (2:12).
 - ☐ Where two or more existing applications of any type of roof covering are encountered.
 - ☐ Where structures such as trellises, patio covers, canopies, carports and similar structures are used to support PV systems. Note: Solar PV modules, where installed over open-grid framing shall be fire rated in accordance with 2024 IRC 329.7.1.
 - ☐ Where existing foundations are penetrated to install vehicle impact protection of ESS equipment or batteries.
 - ☐ Where the weight of wall mounted ESS equipment requires additional support and for design of that additional support.

Electrical and System Information

- One-line or three-line diagram showing:
 - Size and type of conductors. Per CPS Energy Standards Article 2000, the minimum size is #10 copper.
 - Voltage and amperage of all circuits.
 - Ampacity and type of all over-current protection.
 - Equipment grounding.
 - Disconnection devices – AC & DC.
 - Line side tap or load side interconnection.
 - Inverters.
 - Conductor pathways-in attic or exterior to building.
 - ESS Equipment or battery size and type.
 - If service panel is replaced or upgraded, main breaker or main disconnect, and surge protective device is required.
- Manufacturers specification sheets, installation instructions, and listing information for all components, generators, ESS equipment, storage batteries. Roof mounted solar PV panels or modules shall have the same fire classification as the roof assembly per the 2024 International Residential Code Section R902.4.
- Information on labeling placards as required by 2023 NEC Articles 230, 690, 691, & 705.
- Load calculations demonstrating how the system was sized. The electric load calculation shall comply with the applicable provisions of 2023 NEC Article 220 and shall include the load information necessary to charge batteries or other energy storage equipment.
- Batteries must be installed in a listed racking system and located in areas provided with ventilation in accordance with manufacturer's installation instructions.

If you have any questions regarding this Information Bulletin or the procedures for third party plan review and inspections, please contact the Electrical Inspections Team 210-207-1111.

Prepared by: Valerie Gleason, Chief Electrical Inspector

Reviewed by: Richard Chamberlin, PE, Development Services Engineer

Authorized by: Crystal Gonzales, PE, CBO, Assistant Director



DEVELOPMENT SERVICES

THIRD-PARTY REVIEW DECLARATION OF COMPLIANCE AND LIABILITY

Project Information

Project Address: _____

Type of Work: _____

Date of Review: _____

Certifying Compliance with City of San Antonio Codes/Ordinances

Initial Here _I certify that I have reviewed the documents associated with the project above in accordance with all applicable laws, codes, ordinances, and standards adopted by the City of San Antonio and the State of Texas, including but not limited to the currently adopted *National Electrical Code, Chapter 10 Building Related Codes, International Residential Code, and International Fire Code* and that my findings are true and correct. Additionally, I certify that all deficiencies (if any) noted during review have been corrected, and there are no deviations, deficiencies, or unresolved items under the scope of this permit.

Liability Acknowledgement

Initial Here _____ I understand and acknowledge that the City of San Antonio is **not liable** for third party reviews and that I am personally liable for damages resulting from any negligent acts or omissions in conducting this plan review, per *Local Government Code 247.0025 (k)-(l)*.

Third-Party Review Information

Name: _____

Company: _____

Email and phone number: _____

License/Certification Number: ____ Issuing Authority/Expiration Date: ____

Third-Party Plan Reviewer Declaration

I, the undersigned "Third-Party Plan Reviewer", declare that I completed the plan review for the home back-up power installation described above and have provided the Development Services Department electronic copies of all reviewed documents and any notes and/or reports created as a part of my review, as required by *Local Government Code 247.0025(h)*. I acknowledge that the home backup power installation may not be placed into service until a City of San Antonio permit has been issued.

Signature: _____ Date: _____

Notary Information

Subscribed and sworn before me by affiant this ____ day of _____, 20____

Executed in _____ County, State of Texas.

Notary Public Signature

Notary's Printed Name

Commission Expires: _____



DEVELOPMENT SERVICES

THIRD-PARTY INSPECTION DECLARATION OF COMPLIANCE AND LIABILITY

Project Information

Project Address: _____

Type of Work: _____

Date of Review: _____

Certifying Compliance with City of San Antonio Codes/Ordinances

Initial Here I certify that I have inspected the home backup power installation associated with the project above in accordance with all applicable laws, codes, ordinances, and standards adopted by the City of San Antonio and the State of Texas, including but not limited to the currently adopted *National Electric Code, Chapter 10 Building Related Codes, International Residential Code, and International Fire Code* and that my findings are true and correct. Additionally, I certify that all deficiencies (if any) noted during inspection have been corrected, and there are no deviations, deficiencies, or unresolved items under the scope of this permit.

Liability Acknowledgement

Initial Here _____ I understand and acknowledge that the City of San Antonio is **not liable** for third party inspections and that I am personally liable for damages resulting from any negligent acts or omissions in conducting this backup power inspection, per *Local Government Code 247.0025 (k)-(l)*.

Third-Party Inspector's Information

Name: _____

Company: _____

Email and phone number: _____

License/Certification Number: _____ Issuing Authority/Expiration Date: _____

Third-Party Inspector's Declaration

I, the undersigned "Third-Party Plan Inspector", declare that I completed the inspections for the home back-up power installation described above and have provided the Development Services Department electronic copies of all inspection documents and any notes and/or reports created as a part of my inspection, as required by *Local Government Code 247.0025(h)*. I acknowledge that the home backup power installation may not be placed into service until all inspections for other work associated with the backup system but not part of the third-party professional's scope has been completed and commissioning requirements by CPS Energy are met.

Signature: _____ Date: _____

Notary Information

Subscribed and sworn before me by affiant this ____ day of _____, 20____

Executed in _____ County, State of Texas.

Notary Public Signature

Notary's Printed Name

Commission Expires: _____



Third-Party Hold Harmless and Indemnification Agreement

Project Address: _____

Application/Permit Number: _____

Date: _____

Reviewer/Inspector Name: _____

Certification/License Number and Type (if applicable): _____

Pursuant to Texas Local Government Code Chapter 247, I, the undersigned, hereby acknowledge that I am not an employee, agent, or representative of the City of San Antonio, and that I have independently conducted the review and/or inspection related to a home backup power installation at the project address listed above.

In consideration of the City's issuance of a permit based solely on third-party review and/or inspection as authorized under Chapter 247, I agree to the following:

1. **Hold Harmless:** I shall hold harmless, release, and discharge the City of San Antonio, its officers, employees, and agents from any and all liability, claims, causes of action, or demands arising out of or related to the review, approval, inspection, or installation of the system referenced in this permit.
2. **Indemnification:** I agree to indemnify and defend the City of San Antonio, its officers, employees, and agents against any and all claims, losses, damages, liabilities, or expenses (including attorneys' fees and court costs) resulting from:
 - o My acts or omissions in conducting the review or inspection,
 - o Any failure of the installation to comply with applicable codes or standards, and
 - o Any injury, property damage, or other consequence related to the reviewed or inspected work.
3. **Acknowledgment of Responsibility:** I understand that I am fully responsible for the adequacy, accuracy, and code compliance of all work reviewed or inspected under this authorization and that the City of San Antonio assumes no liability or responsibility for such work.

4. **No City Review or Verification:** I acknowledge that the City of San Antonio did not perform any document review or inspection of the system identified herein. All document reviews and/or inspections have been made solely by me.

Print Name: _____

Company:

Address:

Signature: _____ Date: _____

Executed in _____ County, State of Texas.

Notary Information

Subscribed and sworn before me by affiant this ____ day of _____, 20____

Executed in _____ County, State of Texas.

Notary Public Signature

Notary's Printed Name

Commission Expires: _____



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