

LARA-BCC-Rules

From: Anthony Yaroch <adyaroch@gmail.com>
Sent: Thursday, September 14, 2023 1:18 PM
To: LARA-BCC-Rules
Subject: Part 8 Rules Removal of MRC for Electrical.

Categories: T.Williamson

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Add a requirement in the Part 8 Rules stating this document removes the electrical requirements from the Residential Code.

Sincerely,

Anthony D Yaroch

LARA-BCC-Rules

From: Brandon Newport <bnewport2@gmail.com>
Sent: Tuesday, September 19, 2023 6:29 PM
To: LARA-BCC-Rules
Subject: Concern of r408.30826 changes

Categories: T.Williamson

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I want to voice my concern in regards to the rescinding of R408.30826 Violations.

This was established to require the authority having jurisdiction (AHJ) to report their findings to the permit holder. Taking this away could result in the AHJ leaving their findings (violation or no violation) only on the jobsite. The issue is typically when the AHJ is there the contractor has completed and is not returning until the next phase of the project is ready, the results would not be known until the contractor calls the AHJ or returns to the site (both would cause extra time to either or both AHJ and Electrical Contractor). This could also add stress and animosity between the AHJ and Contractors due the fact it was assumed no communication good or bad would mean the project can proceed to the next phase. The AHJs have currently incorporated this into their procedures. I would see it as a loss with no gains for anyone.

Every time I speak with an inspector they are already overloaded with the current daily tasks. I can only imagine having to take another 10-20 phone calls a day will speed up the process.

Thanks for the consideration.

LARA-BCC-Rules

From: Craig, Jason <JasonC@romi.gov>
Sent: Friday, September 15, 2023 9:58 AM
To: LARA-BCC-Rules
Subject: comments on part 8 electrical rules

Categories: T.Williamson

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Attn: Tony Williamson, Bureau of Construction Codes P.O. Box 30254, Lansing, MI 48909
Bureau of Construction Codes, P.O Box 30254, Lansing, MI 48909

I suggest the underlined words be added to the section to clarify the meaning and intent.

80.19 (d) Expiration. Permits shall expire 180 days after issuance if an inspection has not been performed or 180 days after the last inspection date.

Jason Craig
Building Official
City of Royal Oak

LARA-BCC-Rules

From: Craig Ortega <COrtega@conelectric.com>
Sent: Tuesday, September 19, 2023 7:34 PM
To: LARA-BCC-Rules
Subject: Comment regarding Administrative Rules for Construction Codes - Part 8. Electrical

Categories: T.Williamson

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Tony

I want to voice my concern in regards to the rescinding of R408.30826 Violations.

This rule requires the authority having jurisdiction (AHJ) to report their findings to the permit holder. It is interpreted to encourage communication between the AHJ's and contractors. Eliminating this requirement could result in the AHJ documenting their findings (violation or no violation) only on the jobsite. Often, the AHJ is inspecting work that the contractor has already completed and in some circumstances is not returning until the next phase of the project is ready. Without communication, the results would not be known until the contractor calls the AHJ or returns to the site. Both scenarios could increase the amount of time involved for both parties, presumably the opposite of the intended effect of eliminating this rule. This could also add stress and animosity between the AHJ and Contractors due the fact it may be assumed that no communication could mean the project can proceed to the next phase. Lastly, the AHJs have currently incorporated this step into their existing procedures. Not rescinding this rule would not negatively impact the AHJs.

Thanks for the consideration.



Craig Ortega Preconstruction Services 517.507.1979
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LARA-BCC-Rules

From: Dan Pohl <dpohl@conelectric.com>
Sent: Monday, September 18, 2023 6:52 AM
To: LARA-BCC-Rules
Subject: MEC Adoption

Categories: T.Williamson

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Attn: Tony Williamson

1. I agree with moving forward with the adoption of the 2023 Michigan Electrical Code. Michigan needs to speed up the adoption process.
2. There is no need to postpone the effective date 120 after adoption. The State does not publish a separate book for the Michigan Electrical Code, as they do with other codes.
3. Add a requirement in the Part 8 Rules stating this document removes the electrical requirements from the Residential Code.
4. There are too many terms used for the Authority Having Jurisdiction and it leads to confusion. Authority Having Jurisdiction is defined in the National Electrical Code and includes other terms that are used in the Part 8 Rules, Such as: "Enforcing Agency", "Code Official", "Inspector", "Electrical Inspector", "Electrical Inspector Having Jurisdiction". Do these terms used have different meaning? Consistent use of terms provides clarity.
5. 80.19(d) states "Permits shall expire 180 after issuance or 180 days after the last inspection date." It appears that the AHJ would make that interpretation on which date to use? The contractor could be required to secure another permit even though he had an inspection seven days prior.

Thanks
Dan



Dan Pohl Senior Project Manager 517.202.4705
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LARA-BCC-Rules

From: Dan Pohl <dpohl@conelectric.com>
Sent: Monday, September 11, 2023 11:05 AM
To: LARA-BCC-Rules
Cc: Dan Pohl
Subject: Rule Set 2022-59 LR

Categories: T.Williamson

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All

I want to voice my concern in regards to the rescinding of R408.30826 Violations. This was established to require the authority having jurisdiction (AHJ) to report their findings to the permit holder. Taking this away could result in the AHJ leaving their findings (violation or no violation) only on the jobsite. The issue is typically when the AHJ is there the contractor has completed and is not returning until the next phase of the project is ready, the results would not be known until the contractor calls the AHJ or returns to the site (both would cause extra time to either or both AHJ and Electrical Contractor). This could also add stress and animosity between the AHJ and Contractors due the fact it was assumed no communication good or bad would mean the project can proceed to the next phase. The AHJs have currently incorporated this into their procedures. I would see it as a loss with no gains for anyone.

Please confirm receipt
Thanks for the consideration.

Dan



Dan Pohl Senior Project Manager 517.202.4705
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2023 Michigan Electrical Code Public Comment September 27, 2023

Part 8 Electrical Code

1. Revising Rule 801 to reflect which printed edition of the National Electrical Code that is being adopted by the State is beneficial as to which TIA's are included in our adoption. Rule 801, Rule 826 was rescinded and deleted 80.23. Rule 801 needs to be modified to exempt 80.23 from Annex H. If this is not exempted, it would need to be modified due to empty areas in the section.

Rule 801. (1) The standards contained in the national electrical code ~~2017~~ **2023 second printing** edition, **including TIA 70-23-1 through 70-23-13, and Errata 70-23-1 through Errata 70-23-6,** including Annex H, except sections 80.2, 80.5, 80.15, ~~80.21,~~ **80.23,** 80.27, 80.29, 80.31, 80.33, 80.35, and 90.6, and 547.1 to 547.10, as published by the national fire protection association (NFPA), shall govern the installation, replacement, alteration, relocation, and use of electrical systems or material. With the exceptions noted, the national electrical code is adopted in these rules by reference.

2. 80.19(d) states "Permits shall expire 180 after issuance or 180 days after the last inspection date." It appears that the AHJ would make that interpretation on which date to use? The contractor could be required to secure another permit even though he had an inspection seven days prior.

80.19(d) Permits shall expire 180 after issuance ~~or~~ **and are extended** 180 days ~~after~~ **from** the last inspection date."

3. The adoption of current electrical codes has an impact on the ISO, Insurance Services Office, ratings on various municipalities and the state. Delaying the adoption of the codes has an impact on the insurance ratings and increases the costs for the residents and businesses in Michigan. Michigan needs to be more proactive with building code adoption especially the electrical codes with all the changes each code cycle.
4. Require the provisions of the Michigan Electrical Code to apply to all construction, including residential one- and two-family dwellings. Presently we are on the 2015 Michigan Residential Code that is based on the electrical requirements found in the 2014 National Electrical Code. The requirements in the 2014 National Electrical Code is based on the electrical technology and installation practices that had to be submitted in 2011. The advancements in the electrical industry have exponentially increased over the past decade and Michigan is left in the dark. Inspectors are required to write corrections on a document that most in the electrical industry do not purchase since the National Electrical Code applies to all electrical installations.

80.9(D) Residential. This Code applies to all residential installations.

5. Code Book Pricing. Rule 801, (5) there are three standards referenced and only pricing for two books, and it is not clear on the prices as to which document the two prices apply.
6. Consistent use of terms in the document for the Authority Having Jurisdiction (AHJ) is beneficial. Having six different terms is confusing. The document is using “code official”, “enforcing agency”, “inspector”, “electrical inspector”, and “electrical inspector having jurisdiction” and the correct term “authority having jurisdiction” which is defined in Article 100 of the National Electrical Code.

Authority Having Jurisdiction (AHJ).

An organization, office, or individual responsible for enforcing the requirements of a code or standard, or for approving equipment, materials, an installation, or a procedure. (CMP-1)

Informational Note: The phrase “authority having jurisdiction,” or its acronym AHJ, is used in NFPA documents in a broad manner, since jurisdictions and approval agencies vary, as do their responsibilities. Where public safety is primary, the authority having jurisdiction may be a federal, state, local, or other regional department or individual such as a fire chief; fire marshal; chief of a fire prevention bureau, labor department, or health department; building official; electrical inspector; or others having statutory authority. For insurance purposes, an insurance inspection department, rating bureau, or other insurance company representative may be the authority having jurisdiction. In many circumstances, the property owner or his or her designated agent assumes the role of the authority having jurisdiction; at government installations, the commanding officer or departmental official may be the authority having jurisdiction.

7. Electrical codes are so far behind we need to adopt the 2023 Michigan Electrical Code as soon as possible. The state of Michigan does not publish a separate Michigan Electrical Code Book and in the past the code became effecting after approval of the secretary of state. It appears there is a new clause that states the rules do not become effective until 120 days after the filing of the secretary of state. We are already one full code cycle behind, please do not delay it any further.

~~These rules become effective 120 days after filing with the secretary of state.~~

Thank you for all your efforts this code cycle to improve the quality of the Michigan Electrical Code, Part 8 Rules

David Williams, Secretary, International Association of Electrical Inspectors, Michigan Chapter
1422 Lindy Drive, Lansing, Michigan 48917

LARA-BCC-Rules

From: David Williams <daw1422@gmail.com>
Sent: Saturday, August 26, 2023 8:21 PM
To: Ash, Lance (LARA); Williamson, Tony (LARA)
Cc: LARA-BCC-Rules; Place, Katherine (LARA); Amanda Johnson
Subject: Part 8 Electrical Rules Comments and Questions

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: T.Williamson

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Hello Tony and Lance,

The draft rules for the Michigan Electrical Code Part 8 Rules is a vast improvement from last cycle. Congratulations and thank you for the effort involved.

I do have a few comments that I would appreciate a response prior to the Public Hearings if possible.

1. Rule 801, Rule 826 was rescinded and deleted 80.23.
I assume since 80.23 is not exempted from Annex H in Rule 801. Than Annex H Section 80.23 would apply. Do we need to add 80.23 to the sections being exempted from Annex H?
2. Rule 801, (3) NFPA 110 and 111 Editions are not the current standard. 2022 Edition
3. Rule 801, (5) there are three standards referenced and only pricing for two, and it is not clear on the price of the documents.
4. 80.19(d) states "Permits shall expire 180 after issuance or 180 days after the last inspection date." It appears that the AHJ would make that interpretation on which date to use? The contractor could be required to secure another permit even though he had an inspection seven days prior.
5. 80.19(g) Limits only one extension to a permit. Many jobs can last longer than a year.
6. 700.9, NFPA 110 and 111 Editions are not the current standard. 2022 Edition
7. 701.9, NFPA 110 and 111 Editions are not the current standard. 2022 Edition
8. Consistent use of terms in the document for the Authority Having Jurisdiction (AHJ) is beneficial. Having six different terms is confusing. The document is using "code official", "enforcing agency", "inspector", "electrical inspector", and "electrical inspector having jurisdiction" and the correct term "authority having jurisdiction" which is defined in Article 100 of the National Electrical Code. Are these other terms defined or are they different?

Thanks Again for all that you do for the electrical industry.

--

Dave

LARA-BCC-Rules

From: Dan Decker <dandecker@safetysystems.net>
Sent: Wednesday, September 20, 2023 1:54 PM
To: LARA-BCC-Rules
Cc: Jason Wadaga
Subject: Administrative Ruiles for Construction Codes - Part 8 Electrical Code

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In reviewing the proposed rules and the Skilled Trades Regulation Act, there appears to be an exception to permits in the Act that is not reflected in the proposed rules:

MCL ACT 407 of 2016 339.5737

Sec. 737 (3) A license is not required to perform any of the following classes of work:

15 subsections lettered (a) through (o) list exceptions to a requirement for a license, and includes:

(k) The installation, maintenance, or servicing of security alarm systems in a building or structure. As used in this subdivision, "security alarm system" means that term as defined in 733(2)(c)

Proposed Part 8 Rules

Rule 80.19(c) Permit not required. A permit is not required for all of the following:

(4) Statute exemptions. Installations that are referred to in section 737(3)(a), (b), (c), (d), (f), (h), (l), and (m) of the skilled trades regulation act, 2016 PA 407, MCL 339.5737. The exceptions noted in the act appear to be reflected in the rules, with the exception of (k), which appears in the Act and not in the Rules.

It is my understanding that the rules are to follow the Act, and it appears (k) should be added to the rules to be consistent with the Act. Otherwise the rules would be in conflict with the language of the Act. We recommend adding "(k)" to the text of Rule 80.19(c)(4), with the other noted exceptions.

Thanks!

Dan

Daniel G. Decker CFPS, CPP, SET
President
Safety Systems, Inc.
P: 517-782-9817
dandecker@safetysystems.net



www.safetysystems.net

LARA-BCC-Rules

From: Gary Lazette <gj.lazette@gmail.com>
Sent: Tuesday, September 19, 2023 8:07 PM
To: LARA-BCC-Rules
Subject: 2023 Michigan Electrical Code Adoption

Categories: T.Williamson

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Attn: Tony Williamson, Bureau of Construction Codes

I am not able to attend the public hearing on Thursday, September 21 at 9:00 am, however I do have some thoughts to share.

Michigan needs to speed up the adoption process and approve it without waiting the 120 days after adoption. The State does not publish a separate book for the Michigan Electrical Code, as they do with other codes..

It would be great to have a code adopted in the current calendar year 2023.

A requirement needs to be in the Part 8 Rules stating this document removes the electrical requirements from the Residential Code.

There are too many confusing terms. Authority Having Jurisdiction is defined in the National Electrical Code and includes other terms that are used in the Part 8 Rules, such as: "Enforcing Agency", "Code Official", "Inspector", "Electrical Inspector", "Electrical Inspector Having Jurisdiction".

Do these terms used have different meanings? We need consistency and clarity.

Thank you for taking time to read my comments and suggestions.

Gary J Lazette
Code official
Master Electrician

LARA-BCC-Rules

From: Jeff Lotycz <jlotycz@conelectric.com>
Sent: Wednesday, September 13, 2023 11:24 AM
To: LARA-BCC-Rules
Subject: Part 8 Rules R408.30826

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: T.Williamson

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Tony

I want to voice my concern in regards to the rescinding of R408.30826 Violations. This was established to require the authority having jurisdiction (AHJ) to report their findings to the permit holder. Taking this away could result in the AHJ leaving their findings (violation or no violation) only on the jobsite. The issue is typically when the AHJ is there the contractor has completed and is not returning until the next phase of the project is ready, the results would not be known until the contractor calls the AHJ or returns to the site (both would cause extra time to either or both AHJ and Electrical Contractor). This could also add stress and animosity between the AHJ and Contractors due the fact it was assumed no communication good or bad would mean the project can proceed to the next phase. The AHJs have currently incorporated this into their procedures. I would see it as a loss with no gains for anyone.

Thanks for the consideration.



Jeff Lotycz VP of Residential Operations **517.202.4706**
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LARA-BCC-Rules

From: welshd1@comcast.net
Sent: Wednesday, September 20, 2023 5:39 PM
To: LARA-BCC-Rules
Subject: 2023 Michigan Electrical Code Adoption

Categories: T.Williamson

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Attn, Tony Williamson

1. I agree with moving forward with the adoption of the 2023 Michigan Electrical Code. Michigan needs to speed up the adoption process.
2. There is no need to postpone the effective date 120 after adoption. The State does not publish a separate book for the Michigan Electrical Code, as they do with other codes.
3. Add a requirement in the Part 8 Rules stating this document removes the electrical requirements from the Residential Code.

Thanks

Jeff Welsh

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M#269-340-2916

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LARA-BCC-Rules

From: Jeremiah Keller <jkeller@conelectric.com>
Sent: Wednesday, September 13, 2023 11:36 AM
To: LARA-BCC-Rules
Subject: 2023 MEC rule hearing

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: T.Williamson

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Tony

I want to voice my concern in regards to the rescinding of R408.30826 Violations.

This was established to require the authority having jurisdiction (AHJ) to report their findings to the permit holder. Taking this report away could result in the AHJ leaving their findings (violation or no violation) only on the jobsite. The issue is typically when the AHJ inspection has taken place when the contractor is not onsite or not returning until the next phase of the project is ready. The results would not be known until the contractor calls the AHJ or returns to the site (both would cause extra time to either or both AHJ and Electrical Contractor). This could also add stress and animosity between the AHJ and Contractors due the fact it was assumed no communication, good or bad has happened. Meaning the project cannot proceed to the next phase. The AHJs have currently incorporated this into their procedures. I would see it as a loss with no gains for anyone.

Thank you.



Jeremiah Keller CMF Project Manager 517.488.2213
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LARA-BCC-Rules

From: John Keil <jkeil13@yahoo.com>
Sent: Friday, September 15, 2023 10:37 AM
To: LARA-BCC-Rules
Subject: 2023 Michigan Electrical Code Adoption

Categories: T.Williamson

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Attn: Tony Williamson,

I will not be able to attend the Public Hearing for the Adoption of the 2023 Michigan Electrical Code but I do have a couple comments.

1. Add a requirement in Part 8 Rules stating this document removes the electrical requirements from the Michigan Residential Code. It makes it hard when you have to reference two different code books.
2. I agree with moving forward with the adoption of the 2023 Michigan Electrical Code. Michigan needs to speed up the adoption process.

Thank you for your time. Have a great day, be safe and keep smiling

John Keil

LARA-BCC-Rules

From: KEITH WOODCOCK <kwoodcock@wideopenwest.com>
Sent: Wednesday, September 20, 2023 4:55 PM
To: LARA-BCC-Rules
Cc: Keith Woodcock
Subject: 2023 Michigan Electrical Code Adoption - My Public Comments

Categories: T.Williamson

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Tony Williamson and Hearing committee,

Due to work schedule constraints, I cannot personally attend the Public Hearing on September 21, 2023. However, I would like to have my comments placed in the Public Record per the administrative process.

I am a third generation Licensed Master Electrician in the State of Michigan. During my professional career I have worked with the tools in the field, trained numerous apprentices, been an Act 54 /; 407 Registered Electrical inspector and Plan Reviewer. I have had a stake in the state Electrical code adoption process for over 45 years. As many of my fellow licensees, I have been very discouraged with the delays in a timely adoption of the code, cycle after cycle. The State of Michigan is NOT a leader in its concerns for prompt code adoption or keeping out Michigan specific changes for special interest maintaining their profit margins rather than being concerned for public safety. These groups have this opportunity to influence the NFPA 70 adoption process on a national level.

With my interests as a citizen and electrical professional in the State of Michigan, please forward the following comments to the hearing members.

1. I agree with moving forward with the adoption of the 2023 Michigan Electrical Code. Michigan needs to speed up the adoption process.
2. There is no need to postpone the effective date 120 after adoption. The State does not publish a separate book for the Michigan Electrical Code, as they do with other codes.
3. Add a requirement in the Part 8 Rules stating this document removes the electrical requirements from the Michigan Residential Code.
4. There are too many terms used for the Authority Having Jurisdiction and it leads to confusion. Authority Having Jurisdiction is defined in the National Electrical Code and includes other terms that are used in the Part 8 Rules, such as: "Enforcing Agency", "Code Official", "Inspector", "Electrical Inspector", "Electrical Inspector Having Jurisdiction". Do these terms used have different meaning? Consistent use of terms provides clarity.

5. 80.19(d) states "Permits shall expire 180 after issuance or 180 days after the last inspection date." It appears that the AHJ would make that interpretation on which date to use? The contractor could be required to secure another permit even though he had an inspection seven days prior.

The above items were developed by a great organization, Michigan Chapter of the International Association of Electrical Inspectors, board of directors comprising hundreds of hours of discussion and debate at the licensee level. Please honor the weight of all of these professional's time and talent by implementing these concerns.

Respectively,

Keith A. Woodcock, P.E.M

Building Official, Build / Elect Inspector,

Plan Reviewer all 4 trades

Kwoodcock@wideopenwest.com

734-771-2210

LARA-BCC-Rules

From: Ken Simpson <ksimpson.insp@gmail.com>
Sent: Tuesday, September 19, 2023 7:04 PM
To: LARA-BCC-Rules
Subject: Part 8 Electrical Rules

Categories: T.Williamson

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Attn: Tony Williamson
PO Box 30254
Lansing, MI 48909

It is good to see our state moving toward adopting the current version of the NEC. I would strongly suggest the Part 8 Rules have a requirement that removes the electrical requirements of the Michigan Residential Code and use the rules in the National Electrical Code.

Doing so would:

1. Simplify enforcement in the field.
2. Eliminate the time spent for hearings on a second (electrical) adoption (MRC) process.
3. Reduce the amount of paper used to publish a second code.

So, please consider eliminating the electrical portion of the MRC. As an inspector for 30 years and in the trade for nearly 50, I have seen the MRC be a frustration for inspectors and tradesmen in the field since its inception.

Sincerely,

--

Ken Simpson - Registered Electrical Inspector (3596)
ICC Certified Electrical Inspector

LARA-BCC-Rules

From: Mike s <mike@solarboyz.com>
Sent: Friday, September 15, 2023 5:16 PM
To: LARA-BCC-Rules
Subject: re 2023 Electrical adoption

Categories: T.Williamson

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- 1) Do whatever it takes to join or lead the country in code adoption in a timely fashion. It will only be painful once for electricians, contractors and inspectors.
- 2) Get rid of all Michigan specific nuances at the earliest opportunity. They add nothing to the purpose of the NEC.

--
Mike Schmerl

LARA-BCC-Rules

From: Phil Clark <clarktraining1@gmail.com>
Sent: Tuesday, September 19, 2023 6:11 PM
To: LARA-BCC-Rules; David Williams; Chris Cleveland
Subject: 2023 Michigan Electric Code Adoption

Categories: T.Williamson

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Dear Bureau of Construction Codes:

I am writing to contribute to the discussion on Electrical Code Adoption.

I'll make the following suggestions:

1. I suggest moving forward with the adoption of the 2023 Michigan Electrical Code with all possible speed. Every day that we delay means that the residents of Michigan are denied the increased electrical safety provided by the latest Code edition. Thousands of hours of discussion by industry experts are involved in revising the National Electric Code, providing the latest approaches to electrical safety. Adoption of the latest Code has already been delayed nearly six(6) years.
2. There seems to be no need to postpone the effective date of Code enforcement to 120 days after adoption. There is no separate publication by the State book for the Michigan Electrical Code, unlike other adopted codes.
3. Electrical requirements for Residential installations are included in the National Electric Code. Part 8 Rules should specifically state that the National Electric Code is the governing document for all electrical installations. The Michigan Residential Code sections dealing with residential work should be eliminated.
4. The Part 8 Rules should adopt the same definition for "Authority Having Jurisdiction" as the National Electric Code. The several different terms presently provided in the Part 8 Rules are confusing and unnecessary. A single, widely accepted definition will provide clarity.
5. 80.19(d) states "Permits shall expire 180 after issuance or 180 days after the last inspection date." I believe this language should be changed to : "Permits shall expire 180 days after issuance unless extended by specific approval by the AHJ." In this way, confusion about an ending date would be removed.

Yours,
Phil Clark

--
Phil Clark
Clark & Associates
1081 Hubbard
Detroit, MI 48209
(313) 929-6383
ClarkTraining1@gmail.com

LARA-BCC-Rules

From: Rick Kinsman <RKinsman@deltami.gov>
Sent: Wednesday, September 27, 2023 9:30 AM
To: LARA-BCC-Rules
Subject: Rule Set 2002-59 LR (Part 8 rules)

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To whom it may concern,

This mail is to support the adoption of the Part 8 Electrical code rule set.

We are currently outdated with the electrical code. This is creating safety concerns for the public and installers of electrical components.

With all the technical advances in the electrical trades we need to update our rules and adopt the current code as written.

Thank you for the consideration,

Rick Kinsman

- Master electrician for over 25 years
- Electrical contractor for 30 years
- Electrical inspector for 16 years

LARA-BCC-Rules

From: Rod Miller <rmiller@conelectric.com>
Sent: Tuesday, September 19, 2023 4:40 PM
To: LARA-BCC-Rules
Subject: FW: R408.30826 Violations - Rescinding

Categories: T.Williamson

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Tony,

I have attached a letter in opposition to allow no contact, written or verbal, for failed or approved electrical inspections on jobsites. Please note if this code for inspections/violations is rescinded, it will put an enormous amount of stress and burden on the subcontractors, as well as General Contractors and/or project owners to confirm if requested inspections have failed or passed. While not always, there are numerous occasions where we have completed our scope of work and call for inspections after our staff are no longer on site. This could lead to large delays in projects moving forward with other trades, projects being completed for owners and homeowners to take possession, as well as putting onus on other subcontractors scheduled to perform their duties after we have completed our work assuming a passing inspection has been received. I believe there could be instances where other trades assume the building is ready for their work, and the work is performed without anybody aware of a possible failed electrical inspection, ie – insulation/drywall installed covering electrical work that has not been passed.

I believe allowing the AHJ to not send notice of all inspections, passed or failed, is not in the best interest of the construction industry. The amount of time required to perform this task is a huge asset to all involved in the construction industry, and I hope all reconsider rescinding this code requirement.

Thanking you in advance for your consideration,
Rod Miller, VP CMF/EMU

LARA-BCC-Rules

From: Ron Bellaire <rbellaire65@gmail.com>
Sent: Thursday, September 14, 2023 3:03 PM
To: LARA-BCC-Rules
Subject: Rule set public hearing 2023 Michigan Electrical Code

Categories: T.Williamson

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I submitted two code proposals last year for the adoption of the 2020, 2023 Michigan Electrical Code. They are similar to the information contained in items 1 through 5 below. The items below were sent to me via the Michigan Chapter of the International Association of Electrical Inspectors (IAEI). I agree with every part of these statements.

1. I agree with moving forward with the adoption of the 2023 Michigan Electrical Code. Michigan needs to speed up the adoption process.
2. There is no need to postpone the effective date 120 after adoption. The State does not publish a separate book for the Michigan Electrical Code, as they do with other codes.
3. Add a requirement in the Part 8 Rules stating this document removes the electrical requirements from the Residential Code.
4. There are too many terms used for the Authority Having Jurisdiction and it leads to confusion. Authority Having Jurisdiction is defined in the National Electrical Code and includes other terms that are used in the Part 8 Rules, Such as: "Enforcing Agency", "Code Official", "Inspector", "Electrical Inspector", "Electrical Inspector Having Jurisdiction". Do these terms used have different meaning? Consistent use of terms provides clarity.
5. 80.19(d) states "Permits shall expire 180 after issuance or 180 days after the last inspection date." It appears that the AHJ would make that interpretation on which date to use? The contractor could be required to secure another permit even though he had an inspection seven days prior.

Cass county inspections will be on Mondays and Wednesdays, St Joe County inspections will be Tuesdays and Thursdays. Fridays will be for office work and special case by case inspections.

Midwest Energy, AEP, and Consumers now all require work order numbers for service connections.

Homeowner's reminder, only licensed contractors can install electrical equipment other than the occupying owner.

Permanent service approvals will not be granted until rough is complete on new construction.

Be sure to call for all required final inspections.

Ron Bellaire
Multi Jurisdiction Electrical Inspector
(269)663-3429

LARA-BCC-Rules

From: OPS Coordinator <OPSCOORDINATOR@CONELECTRIC.COM>
Sent: Wednesday, September 13, 2023 9:04 AM
To: LARA-BCC-Rules
Subject: 2023 Michigan Electrical Code Adoption

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: T.Williamson

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I want to voice my concern in regards to the rescinding of R408.30826 Violations. This was established to require the authority having jurisdiction (AHJ) to report their findings to the permit holder. Taking this away could result in the AHJ leaving their findings (violation or no violation) only on the jobsite. The issue is typically when the AHJ is there the contractor has completed and is not returning until the next phase of the project is ready, the results would not be known until the contractor calls the AHJ or returns to the site (both would cause extra time to either or both AHJ and Electrical Contractor). This could also add stress and animosity between the AHJ and Contractors due the fact it was assumed no communication good or bad would mean the project can proceed to the next phase. The AHJs have currently incorporated this into their procedures. I would see it as a loss with no gains for anyone.

Thanks for the consideration.



Tabytha Del Cid Operations Coordinator **517.275.6622**
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877.981.8800 www.conelectric.com



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LARA-BCC-Rules

From: Thomas Bowes <kk8m@me.com>
Sent: Thursday, September 21, 2023 7:47 AM
To: LARA-BCC-Rules
Subject: Michigan Electrical Code Adoption

Categories: T.Williamson

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To whom it may concern,

I am writing to express my support for expediting the adoption of the 2023 National Electrical Code as amended by the Michigan Part 8 Rules to create the Michigan Electrical Code. I am in favor of having this happen as soon as possible, without any unnecessary waiting period. I am also in support of removing the electrical requirements from the Michigan Residential Code as it has proved to be cumbersome for electrical inspectors and for journeymen and contractors to have to work between different reference documents with different numbering schemes and provisions. Maintaining separate electrical codes has also increased the work for the Bureau of Construction Codes and in the interest of governmental efficiency the practice should be done away with.

Respectfully,

Thomas W. Bowes
Michigan Licensed Journeyman Electrician Michigan Registered Electrical Inspector