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Testimony of Christopher Bresee
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Before the Michigan Joint Committee on Administrative Rules

In Support of Adoption:
JCAR 25-20 Construction Code Part 5. Residential Code
JCAR 25-19 Construction Code Part 10. Michigan Uniform Energy
Code

Good afternoon Chair Wozniak, Alternate Chair Wojno, and members of the Joint Committee on Administrative Rules. My name is Chris Bresee and I am a Director of State Government Affairs at the National Electrical Manufacturers Association (NEMA). I am here to speak in support of adoption of JCAR 25-20 Construction Code Part 5. Residential Code and JCAR 25-19 Construction Code Part 10. Michigan Uniform Energy Code. Thank you for your time and consideration.

NEMA is the leading trade organization representing America's electroindustry. Our more than 300 manufacturing companies include producers of reliable, connected, and secure products which are used throughout critical infrastructure sectors and other key markets, such as building infrastructure; building systems; lighting systems; industrial products and systems; utility products and systems; and transportation systems. NEMA members manufacture many of the products necessary to provide electricity to Michigan consumers and businesses, equipment that powers electric vehicles, and products that make buildings and homes more energy efficient¹. In Michigan, the electroindustry supports more than 48,000 jobs and creates more than \$5.8 billion in GDP contributions².

NEMA strongly supports the adoption of both the 2021 Michigan Residential Code (MRC) and the 2021 Michigan Uniform Energy Code (MUEC). Currently, Michigan uses the 2015 MRC and the 2015 MUEC, with a statutory requirement to update these codes at a minimum of every six years. The 2021 International Residential Code (IRC), which the 2021 MRC is based upon, has been adopted by 14 states, with many more municipalities adopting these updated codes to positive effect.

While NEMA also supports the adoption of the 2024 MRC and MUEC, it will likely take years to review, amend, and approve these codes, which will leave Michigan with significantly outdated codes with critical code conflicts. As such, NEMA strongly supports adopting the 2021 MRC and MUEC now and will work to support an efficient process to develop and adopt the 2024 MRC and MUEC to address concerns raised here today. NEMA believes the code process to adopt the 2021 MRC and MUEC has had substantial opportunity for amendments and has properly followed Michigan's procedures to update building and energy codes, and as such should be approved by JCAR today.

Failure to update the MRC to the 2021 edition will cause significant issues for both industry and homeowners. The proposed 2021 MRC is based off of the 2021 Edition of the IRC. The electrical installation requirements within the 2015 MRC conflict with 2023 Michigan Electrical Code, Part 8 which went into effect on March 12, 2024. The 2023 Michigan Electrical Code is based on the 2023 Edition of the National Electrical Code (NEC),

whereas the electrical requirements in the 2015 MRC are based off the requirements from 2011, 2014, and 2017 Editions of the NEC. The proposed 2021 MRC deletes the unnecessary electrical requirements from the 2015 MRC and replaces the text with a simple reference to the 2023 Michigan Electrical Code. This will benefit the residential electrical industry in Michigan as it simplifies the installation requirements and does not require residential electrical contractors and their employees to use multiple code books while applying their trade.

In addition, the 2015 MRC does not cover any of new electrical technologies that are present in the 2023 Michigan Electrical Code, such as Energy Storage Systems, Firefighter Rapid Shutdown for PV Systems, Residential Microgrid Systems that can provide backup power, and Bi-Directional EV Car chargers. These new technologies are currently being installed throughout Michigan without the proper safety protections for residential dwellings in place as the installation requirements for these new technologies were introduced in 2018 and 2021 Editions of the IRC.

The MUEC is based on the 2021 International Energy Conservation Code (IECC). Adoption of the 2021 MUEC will bring substantial benefits to homeowners by greatly increasing energy efficiency of their homes and saving them significant money versus the cost of installing the updated equipment. According to a Pacific Northwest National Laboratory analysis, adoption of the 2021 IECC in Michigan in place of the 2015 IECC with amendments would result in a life-cycle savings of \$4,514 for Michigan homeowners³. It would also create more than 6,675 jobs in the construction sector.

Adoption of the 2021 MUEC also ensures design professionals can utilize the most current energy code compliance software, ensures compatibility with product standards and marketplace availability of products and equipment, and reduces the demand on electrical and water utilities, supporting the transition to renewable and a more resilient energy mix in the state.

Adoption of the MRC and MUEC will also increase manufacturing and supply-chain distribution investments and jobs, improving the Michigan economy. This additionally supports deployment of emerging and advanced technologies further improving the safety, reliability, resilience, efficiency, and sustainability of buildings and community infrastructure throughout the state.

NEMA fully supports a continuing process to update and improve upon building and energy codes in Michigan, but believes leaving the 2015 edition residential and energy codes in

place today will cause significant problems for Michigan. Outdated residential and energy codes will lead to conflicts for construction and maintenance of buildings and homes, higher energy costs for homeowners and business owners, and a potential reduction in investment by manufacturers in Michigan due to the state lagging behind much of the country in code adoption.

NEMA believes all evidence clearly indicates that adoption of the 2021 Michigan Residential Code and the 2021 Michigan Uniform Energy Code is cost-effective and will provide a host of benefits to the citizens, workers, and every community throughout the state. It is for these reasons that NEMA fully supports the approval of these codes by the Joint Committee on Administrative Rules today.

Thank you for the opportunity to provide public comment in support of the adoption of these critical codes. I am happy to take any questions.

Best regards,
Christopher Bresee
Director, State Government Affairs
National Electrical Manufacturers Association (NEMA)

¹ Additional information about NEMA may be found at <https://www.nema.org/>.

² [Michigan Electroindustry Economic Report](#)

³ [Cost-Effectiveness of the 2021 IECC for Residential Buildings in Michigan – Pacific Northwest National Laboratory](#)