

NECA TESTIMONY

Date: June 18, 2009

Pennsylvania Uniform Construction Code Review and Advisory Council (RAC) Meeting June 18, 2009
in Harrisburg, PA

National Electrical Contractors Association (NECA) [National Office]

Subject: Amend ACT 106 to include direct Adoption of the National Electrical Code (NEC)

Public Comments to the RAC

The National Electrical Contractors Association (NECA) recommends the amendment of ACT 106 to include direct adoption of the NEC in its adoption processes. For over 100 years the National Electrical Code has included effective minimum electrical safety rules for persons and property. NECA supports and promotes the direct adoption of the newest version of the NEC together with provisions for proper inspection that verifies conformance. NECA recognizes that circumstances may warrant amendments that address local or unique conditions, but the amendments should not be less than the minimum requirements set forth in the NEC. NECA established standing policies on several issues including local and state legislation.

Justification for Direct NEC Adoption:

1. NECA believes that referencing an electrical Code other than the NEC introduces less familiar rules to an industry that has been built based on compliance with the NEC. The industry is familiar with the NEC and its role in successful business operations. More important the NEC is an essential set of safety rules for protecting persons and property. Not referencing the NEC from the International Residential Code can result in inconsistencies in design, installation, and conformance assessment. These concerns are expressed in the interest of public protection and maintaining stability in the electrical contracting business. The NEC includes the full set of rules applicable to all aspects of electrical installations and systems. Part VIII of the IRC is not a complete set of requirements. It does not cover photovoltaic systems, wind power systems and many limited energy systems. Adoption of the IRC requires using two Codes, which can result in problems for contactors and workers.
2. Electrical contractors use the NEC as a base set of rules for functions such as estimating, project management, design build, installations, and training of the workforce. Electrical workers are trained using the NEC. Introducing them to a set of rules other than those in the NEC is cause for concern in maintaining the same level of confidence in attaining substantial Code compliance. Electrical apprenticeship programs use the NEC as a basis for curriculum development. Local adoption of a less familiar and incomplete set of electrical safety rules for residential construction increases risks that minimum conformance would not be achieved.

3. Conformance Assessment process require effective application of codes and standards to installations and systems. Electrical Code compliance officers are generally familiar with application of the National Electrical Code for installations. This is the common approach in most states and local jurisdictions. Using electrical safety rules foreign to the NEC and rules that are not complete can result in more inconsistencies in code enforcement. This can impact electrical safety and also impact customer services.
4. NECA supports the development process of the National Electrical Code with representation on each of the NEC Technical Committees. There is effective input to the NEC development process from the electrical contracting industry.
5. Since the ICC Codes now reference the NEC it would be logical that the residential one- and two-family dwelling construction also use the NEC from a consistency standpoint for contractors having to achieve Code compliance in residential, commercial, and industrial markets. They should be required to use the same set of electrical safety requirements, those they are trained to and accustomed to using in their business operations.
6. The IRC is not on the same development cycle as the NEC (by 1 year). This creates challenges in code adoption processes for state and local jurisdictions. Using on national code eliminates those concerns.