

NH Building Code Review Board
NH Department of Safety
33 Hazen Drive
Concord, NH 03305

Request to amend the New Hampshire adopted version of NFPA 70, NEC 2011
This is a copy of a similar proposal intended to be submitted by Dean Sotirakopoulos to NFPA for consideration in the NFPA 70 2014 version of the NEC.

Date	10/11/2011	Name	William Benard		Tel. No.	603-644-7170		
Company	Gemini Electric Inc.				Email	Billb@geminielectricinc.com		
Street Address	8 Priscila Lane		City	Auburn	State	NH	Zip	03032

Please indicate organization represented (if any)

1. Section/Paragraph 225.32

2. Proposal Recommends (check one): new text revised text deleted text

3. Proposal (include proposed new or revised wording, or identification of wording to be deleted): [Note: Proposed text should be in legislative format; i.e., use underscore to denote wording to be inserted (inserted wording) and strike-through to denote wording to be deleted (~~deleted wording~~).]

Exception No. 5: The disconnecting means for standalone transfer equipment, shall be permitted to be located elsewhere on the premises. The disconnecting means or the power source shall be required to be lockable in the open or off position when not located within sight of the equipment. Where required, the locking means shall remain in place when the lock is removed.

Substantiation:

This proposal attempts to address different interpretations of when a disconnecting means is required at a structure in at least one case by clarifying that a disconnecting means is not required at a standalone transfer switch or other approved standalone transfer equipment when the circuit supplying or passing through the equipment can be disconnected from a remote location and the disconnecting means locked out if necessary.

Although not all in the industry would consider standalone transfer equipment as a "structure," it is hard to convince those that do that such equipment does not fit the literal wording in the definition of the term in Article 100 or that the conditions differ significantly from those considered by 225.32 Exception No. 2. There is also merit, from a safe work practices standpoint, to the requirements in 225.31 for a means to disconnect conductors supplying or passing through a building or other structure.

The fiscal impact to the customer is substantial as the request to amend recommends adding an exemption to requiring additional electrical disconnects where the safety of the installation is not enhanced in any way. The installation of additional switches in areas not needing such equipment only adds to the complexity and potential installation failure points in the overall system. The only impact to the exemption of the disconnect location would be the elimination of an additional unnecessary financial burden to the installation.

I am the author of the text in this proposal along with the photos and graphic descriptions as presented. The information provided will be substantiated with testimony during the presentation of this proposal.


William Benard