



Code Amendment Proposal Application

Department of Consumer & Business Services

Building Codes Division

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Oregon.gov/bcd

Read the entire code amendment proposal application before completing this form. Please complete all parts before submitting your proposal and refer to the provided checklist.

APPLICANT INFORMATION

Name: STEPHEN SCHMIECHEN	Date:	
Representing (if applicable):	Work phone: 5412321212	
Mailing address: PO BOX 844	Cell phone:	
City: Eugene	State: OR	Zip: 97405
Email address: turtle@think-electric.com		

PROPOSAL INFORMATION

Specialty code: 2023 OESC
Code section(s): 690.12
Briefly explain the subject of your proposal: Delete NEC section 690.12 in its entirety, remove the requirement for rapid-shutdown systems in Oregon.

INSTRUCTIONS AND CHECKLIST

Fill in all the information above and submit this page, signed and dated, with the required supplementary information for Parts I, II, III, and IV described on page 2 of this application. This application may be submitted by mail to the mailing address above, or by email to BCD.PTSPtech@oregon.gov.

Summary checklist for the applicant:

- Part I** Code amendment language is attached in the proper format.
- Part II** Amendment proposal requirements for amending the code have been reviewed.
- Part III** Amendment proposal criteria questions have been answered and are attached.
- Part IV** If applicable, additional ORSC energy efficiency amendment proposal information is attached.

Note: One application is required for each code section you are proposing to amend. If this proposal requires changes in other sections of the code for alignment, include those changes as part of this application.

APPLICANT SIGNATURE

Signature: 

Date: 11/01/2022

Copyright notice: By signing this Code Amendment Proposal Application, I understand and acknowledge that the work contained in this application is original, or if not original, I have the right to copy the work. By signing this work, I understand that any rights I may have in this work, including any form of derivative works and compilations, are assigned to the Department of Consumer and Business Services Building Codes Division. I also understand that I do not retain or acquire any rights once this work is used in a Department of Consumer and Business Services Building Codes Division publication.

2023 OESC Proposal Submitted by Stephen Schmiechen Of Eugene Oregon.

Code language is as follows: 690.12 Entire section: Not adopted by the State of Oregon.

1. Concept and purpose of this proposal:

Delete NEC 690.12 in its entirety so that Oregon will no longer require the *rapid shutdown* requirement for solar PV systems.

2. What problem in the existing Oregon code or national model code is this proposal solving?

Rapid shutdown systems are not a proven reliable safety system for first responders and are an unnecessary added cost to a solar PV system. A random test of several rapid shutdown systems 1 year old or older demonstrated that they do not function at all.

How does this amendment address the issue? If you have evidence demonstrating the problem, submit that information.

Most firefighters do not know what a rapid shutdown system is nor would they rely upon it to create a electrical safe environment.

a) If this proposal corrects any unforeseen or probable outcomes resulting from the application of a code section, explain how.

There is no requirement to annually test a rapid shutdown system and parts to repair the systems are unobtainable. The systems cannot therefore be relied upon to protect fire fighters as intended and create possible false sense of safety.

b) If this proposal corrects inadequate application by a code section to a method, material or design, explain how.

The requirement for a rapid shutdown system has been in the code only since 2014, there are numerous changes to the technology, the code and the UL standard resulting in systems over as little as 6 months old becoming unsupported by manufacturers.

c) If this proposal eliminates conflicting, obsolete, or duplicative code provisions or standards between

N/A

Oregon-adopted codes, statutes or regulations, explain why.

d) If this proposal is for a fire or life safety matter, or is it otherwise needed to protect the health, safety, welfare, comfort and security of occupants and the public, explain why.

The systems cannot therefore be relied upon to protect fire fighters as intended and create possible false sense of safety.

e) If this proposal is necessary to address unique geographic or climatic conditions within Oregon, explain why.

N/A

f) If there are alternatives to this proposal that solve the problem, explain why this proposal is the best or a necessary solution.

N/A

g) If this proposal provides for the use of unique or emerging technologies, or

promotes advances in construction methods, devices, materials and techniques, explain how.

N/A

h) If this proposal meets any energy conservation or indoor air quality requirements, explain how. N/A

i) If this proposal involves the adoption of an electrical or plumbing building product, note if the appropriate advisory board approved the product. N/A

3. Has this been proposed at the national model code level. If so, explain when it was proposed, what happened, and why it was not adopted. Provide all associated national model code hearing information and background.

Implementation and fiscal impact

1. Explain how the proposed provisions would be enforced? Are additional inspections or permits required?

This amendment would make inspection of solar systems faster and more efficient.

Describe any necessary equipment, training, tests or special certifications.

2. What is the fiscal impact of this proposal? Provide a cost benefit analysis and include the resources or methods you used to determine the fiscal impact.

This proposal could reduce the cost of a typical solar PV system by as \$3000 over the life time of the system.

a) If this proposal adds to the cost of construction, explain how the added cost contributes to the health and safety of occupants, or is necessary to conserve scarce resources. N/A

b) If there are any other adverse fiscal impacts or cost savings passed on to the general public, the construction industry, local and state governments, and small businesses, an interested person must describe the added or reduced cost of a proposed code amendment, and describe the adverse fiscal impact or cost savings in relation to the current Oregon specialty code.

This proposal could reduce the cost of a typical solar PV system by as \$3000 over the life time of the system.

c) If this proposal will affect the cost of development of a detached single-family dwelling, please indicate the cost. For the purposes of illustrating the change on the cost, please use a 6,000-square-foot parcel and the construction of a 1,200-square-foot detached single-family dwelling on that parcel. The information on the cost must be sufficient to assist the division in preparing a housing cost impact statement.

This proposal could reduce the cost of a typical solar PV system on a detached single family dwelling by as \$2000 over the life time of the system.

Impacted stakeholders and other specialty codes

1. It is important that proposals be shared with stakeholders that will be impacted by them. Was this proposal developed with people or organizations likely to be affected by it? Has it been reviewed or shared with people or organizations likely to be affected by it? If so, who, and if not, why not?
2. Does this proposal impact other specialty codes or statewide programs? No