



Code Amendment Proposal Application

Department of Consumer & Business Services

Building Codes Division

1535 Edgewater NW, Salem, Oregon

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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: Mike Stone

Date: November 4, 2022

Representing (if applicable): National Electrical Manufacturers Association

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PROPOSAL INFORMATION

Specialty code: Oregon Electrical Specialty Code

Code section(s): 311.40, 320.30, 330.30, 334.30, 334.30, 337.30, 348.30, 350.30, 356.30, 362.30, 392.30, 393.14

Briefly explain the subject of your proposal: Delete the existing OESC amendment that removed the requirement for cable ties supporting various wiring methods to be listed.

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: *Mike Stone NEMA* Date: November 4, 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.

Proposal – OESC Section

1. Describe the concept and purpose of this proposal.

Current OESC language is as follows (underline indicates addition to model code language, ~~strikeout~~ indicates deletion of model code language):

*” **320.30 (A) General.** Type AC cable shall be supported and secured by staples; cable ties ~~listed and identified for securement and support~~; straps, hangers, or similar fittings; or other approved means designed and installed so as not to damage the cable.”*

Proposed model code language is as follows (new text is underlined):

*”**320.30(A) General.***

Type AC cable shall be supported and secured by staples; cable ties listed and identified for securement and support; straps, hangers, or similar fittings; or other approved means designed and installed so as not to damage the cable.”

2. What problem in the existing Oregon code or national model code is this proposal solving? How does this amendment address the issue? If you have evidence demonstrating the problem, submit that information.

Substantiation was provided to the NEC Code Making Panel of the failure of cable ties used for wiring method support that were not listed for the use. Wiring methods installed as a permanent part of a building or structure need to last as long as the building or structure does. Use of listed components will help ensure the permanent secure support of wiring methods.

NOTE: This proposal is intended to apply to Articles 311.40 (Medium Voltage Cable); 320.30 (Armored Cable Type: AC); 330.30 (Metal-Clad Cable, Type: MC); 334.30 (Non-Metallic Sheathed Cable, Type: NM); 337.30 (Type P Cable); 348.30 (Flexible Metal Conduit, Type: FMC); 350.30 (Liquidtight Flexible Metal Conduit, Type: LFMC); 356.30 (Liquidtight Flexible Non-Metallic Conduit, Type: LFNC); 362.30 (Electrical Non-Metallic Tubing, Type: ENT); 392.30 (Cable Trays); 393.14 (Low-Voltage Suspended Ceiling Power Distribution Systems).

Helpful information

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

N/A

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

N/A

- c) If this proposal eliminates conflicting, obsolete, or duplicative code provisions or standards between Oregon-adopted codes, statutes or regulations, explain why.

N/A

- 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.

It is a fire and life safety matter. The life span integrity of electrical systems is critical to the continued safety of the systems. If wiring method supports were to fail during the lifetime of a structure or building it could cause an unsafe situation to occur.

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

N/A

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

N/A

- f) If this proposal provides for the use of unique or emerging technologies, or promotes advances in construction methods, devices, materials and techniques, explain how.

Listed cable ties were first required in the 2014 NEC and are readily available.

- g) If this proposal meets any energy conservation or indoor air quality requirements, explain how.

N/A

- h) 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.

Yes. These proposals ARE the model code language.

Implementation and fiscal impact

1. Explain how the proposed provisions would be enforced? Are additional inspections or permits required? Describe any necessary equipment, training, tests or special certifications.

Installation of listed cable ties is typically verified during rough or final electrical inspections, depending on the type of installation.

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.

Listed cable ties cost from \$0.03 to \$0.12 per unit, depending on the size of packaging and size of the cable tie itself. Unlisted cable ties intended for other types of applications are a similar cost. There is no additional cost to using listed cable ties.

Helpful information

- 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.

Use of listed cable ties does not increase the cost of construction.

- 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.

No difference in cost.

- 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.

The cost of development of a 1,200 square foot dwelling would not be affected by the use of listed cable ties.

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?

This proposal was developed by NEMA members and staff. It aligns with the model NEC and has been reviewed by the respective Code Making Panel members and stakeholders during NEC development processes.

2. Does this proposal impact other specialty codes or statewide programs?

N/A