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MEMORANDUM

TO: Code-Making Panel 13 and NEC® Correlating Committee

FROM: Patrick Foley, *Manager Committee Operations*

DATE: April 21, 2023

SUBJECT: NEC® Proposed Tentative Interim Amendment (TIA) No. 1692–
Public Comment Review

The attached Public Comments are being submitted to the Code-Making Panel and Correlating Committee for review.

If you wish to change your vote, the change must be submitted through the NFPA online ballot system at the following link: [NFPA Ballot Link](#). If you do not wish to change your vote, no response is necessary.

Please complete the ballot on or before **April 28, 2023** by 11:59 pm ET.

While completing your ballot, please remember the following:

- **A comment is required for both Question No. 1 and Question No. 2 for the online TIA ballot. Comments must accompany all Negative, Abstaining and Agree votes.**
- **If you vote “Agree” on Question 1, simply add “Agree” to the comment field and if you vote “Agree” on Question 2, insert the applicable letter(s) selections in the comment field which can be found in the Instructions box on the ballot site.**

You must hit SUBMIT to SAVE your work. **Note:** the system session will time you out after 45 minutes; any work not submitted at that time will not be saved! You may return to finish or change your ballot at any time up to the closing date. Ballot comments exceeding 4,000 characters must be submitted in a Word document via email, to Patrick Foley at pfoley@nfpa.org.

The return of ballots is required by the *Regulations Governing the Development of NFPA Standards*.

Attachment: Public Comment(s)

NFPA 70®-2023 Edition

National Electrical Code®

TIA Log No.: 1692

Reference: 700.32(C), 701.32(C), and 708.54(C)

Comment Closing Date: April 20, 2023

Submitter: Daniel Neeser, Eaton's Bussmann Division

www.nfpa.org/70

1. Revise 700.32(C) Informational Note and title of Figure for the Informational Note to read as follows:

700.32 Selective Coordination.

700.32(A) General. Emergency system(s) overcurrent protective devices (OCPDs) shall be selectively coordinated with all supply-side and load-side OCPDs.

Selective coordination shall be selected by a licensed professional engineer or other qualified persons engaged primarily in the design, installation, or maintenance of electrical systems. The selection shall be documented and made available to those authorized to design, install, inspect, maintain, and operate the system.

700.32(B) Replacements. Where emergency system(s) OCPDs are replaced, they shall be reevaluated to ensure selective coordination is maintained with all supply-side and load-side OCPDs.

700.32(C) Modifications. If modifications, additions, or deletions to the emergency system(s) occur, selective coordination of the emergency system(s) OCPDs with all supply-side and load-side OCPDs shall be reevaluated.

Exception: Selective coordination shall not be required between two overcurrent devices located in series if no loads are connected in parallel with the downstream device.

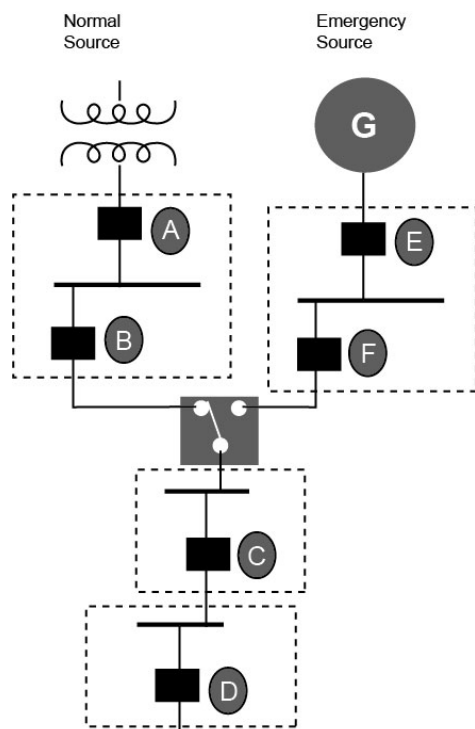
Informational Note: See Informational Note Figure 700.32(E) for an example of how emergency system OCPDs selectively coordinate with all supply-side OCPDs.

~~OCPD D selectively coordinates with OCPDs C, F, E, B, and A.~~

~~OCPD C selectively coordinates with OCPDs F, E, B, and A.~~

~~OCPD F selectively coordinates with OCPD E.~~

~~OCPD B is not required to selectively coordinate with OCPD A because OCPD B is not an emergency system OCPD.~~



Informational Note Figure 700.32(E) Emergency System Selective Coordination.

OCPD D selectively coordinates with OCPDs C, F, E, B, and A.

OCPD C selectively coordinates with OCPDs F, E, B, and A.

OCPD F selectively coordinates with OCPD E.

OCPD B is not required to selectively coordinate with OCPD A because OCPD B is not an emergency system OCPD.

2. *Revise 701.32(C) Informational Note and title of Figure for the Informational Note to read as follows:*

701.32 Selective Coordination.

701.32(A) General. Legally required standby system(s) overcurrent protective devices (OCPDs) shall be selectively coordinated with all supply-side and load-side OCPDs.

Selective coordination shall be selected by a licensed professional engineer or other qualified persons engaged primarily in the design, installation, or maintenance of electrical systems. The selection shall be documented and made available to those authorized to design, install, inspect, maintain, and operate the system.

701.32(B) Replacements. Where legally required standby OCPDs are replaced, they shall be reevaluated to ensure selective coordination is maintained with all supply-side and load-side OCPDs.

701.32(C) Modifications. If modifications, additions, or deletions to the legally required standby system(s) occur, selective coordination of the legally required system(s) OCPDs with all supply-side and load-side OCPDs shall be reevaluated.

Exception: Selective coordination shall not be required between two overcurrent devices located in series if no loads are connected in parallel with the downstream device.

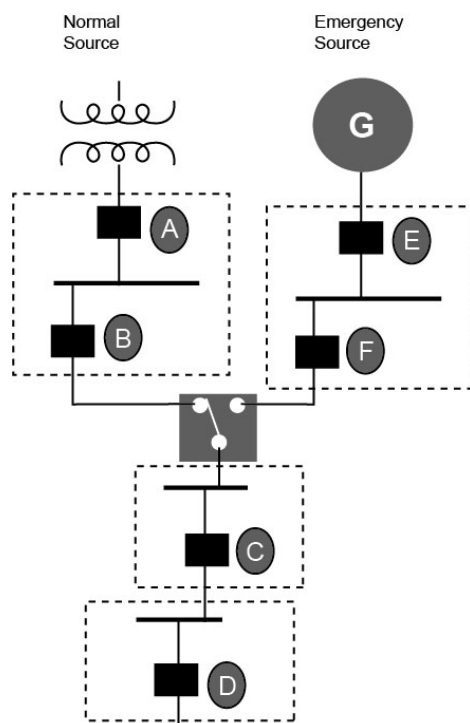
Informational Note: See Informational Note Figure 701.32(G) for an example of how legally required standby system OCPDs selectively coordinate with all supply-side OCPDs.

~~OCPD D selectively coordinates with OCPDs C, F, E, B, and A.~~

~~OCPD C selectively coordinates with OCPDs F, E, B, and A.~~

~~OCPD F selectively coordinates with OCPD E.~~

~~OCPD B is not required to selectively coordinate with OCPD A because OCPD B is not a legally required standby system OCPD.~~



Informational Note Figure 701.32(G) Legally Required Standby System Selective Coordination.

OCPD D selectively coordinates with OCPDs C, F, E, B, and A.

OCPD C selectively coordinates with OCPDs F, E, B, and A.

OCPD F selectively coordinates with OCPD E.

OCPD B is not required to selectively coordinate with OCPD A because OCPD B is not a legally required standby system OCPD.

3. *Revise 708.54(C) Informational Note and title of Figure for the Informational Note to read as follows:*
- 708.54(A) General.** Critical operations power system(s) overcurrent protective devices (OCPDs) shall be selectively coordinated with all supply-side and load-side OCPDs.
- Selective coordination shall be selected by a licensed professional engineer or other qualified persons engaged primarily in the design, installation, or maintenance of electrical systems. The selection shall be documented and made available to those authorized to design, install, inspect, maintain, and operate the system.
- 708.54(B) Replacements.** Where critical operations power system(s) OCPDs are replaced, they shall be reevaluated to ensure selective coordination is maintained with all supply-side and load-side OCPDs.
- 708.54(C) Modifications.** If modifications, additions, or deletions to the critical operations power system(s) occur, selective coordination of the critical operations power system(s) OCPDs with all supply-side and load-side OCPDs shall be reevaluated.
- Exception: Selective coordination shall not be required between two overcurrent devices located in series if no loads are connected in parallel with the downstream device.*

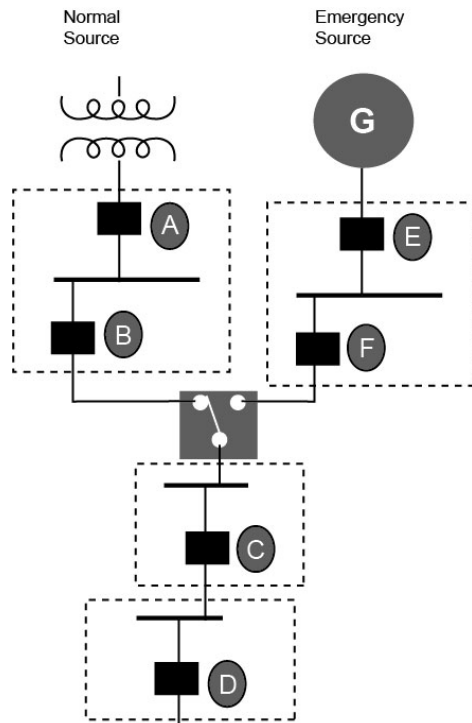
Informational Note: See Informational Note Figure 708.54(E) for an example of how critical operations power system OCPDs selectively coordinate with all supply-side OCPDs.

~~OCPD D selectively coordinates with OCPDs C, F, E, B, and A.~~

~~OCPD C selectively coordinates with OCPDs F, E, B, and A.~~

~~OCPD F selectively coordinates with OCPD E.~~

~~OCPD B is not required to selectively coordinate with OCPD A because OCPD B is not a critical operations power system OCPD.~~



Informational Note Figure 708.54(E) Critical Operations Power System Selective Coordination.

OCPD D selectively coordinates with OCPDs C, F, E, B, and A.

OCPD C selectively coordinates with OCPDs F, E, B, and A.

OCPD F selectively coordinates with OCPD E.

OCPD B is not required to selectively coordinate with OCPD A because OCPD B is not a critical operations power system OCPD.

Substantiation: For each article above: The informational note and figure currently only reference part (C) of the section. When a new part (B) and (C) were added to the section, the informational note was correctly moved to the end of the section. The intent was to have this informational note and figure apply to the entire section. However, the (C) was mistakenly added by NFPA Staff to the informational note and figure after the first draft report and was not noticed by the CMP during the second draft stage of the process. NFPA was contacted that this was an entry error by staff and asked to correct as an erratum. NFPA came back with the recommendation to do a TIA to correct the entry error. This TIA seeks to remove the (C) from the informational note and figure, as recommended by NFPA.

Emergency Nature: The standard contains an error or an omission that was overlooked during the regular revision process.

For each article above: The informational note and figure is intended to apply to all of this section. It now can mistakenly be viewed to only apply when modifications are made to the emergency system. It is important to know that this informational note and figure applies for all emergency systems, replacements, and modifications.

Foran, Rosanne

From: Jeff Gross
Sent: Friday, March 3, 2023 11:29 AM
To: Shared TIAs
Subject: Comment on Proposed TIA 1692 on NFPA 70

The revision clarifies the intent for selective coordination to be applied for replacement and modifications for all emergency systems. I support this this TIA.

Jeff Gross

Sent from [Mail](#) for Windows

Foran, Rosanne

From: Vincent Saporita
Sent: Friday, March 3, 2023 1:12 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1692 on NFPA 70

I support TIA on Log 1692. This TIA is necessary because of an error by NFPA Staff that was not caught by CMP 13. This TIA fixes a serious, significant error that could endanger lives if not rectified.

Foran, Rosanne

From: eddie guidry
Sent: Saturday, March 4, 2023 1:06 AM
To: Shared TIAs
Subject: Comment on Proposed TIA 1692 on NFPA 70

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I support this TIA.

Eddie

Paul E. Guidry | [REDACTED]

Foran, Rosanne

From: Vigen Ghazarian
Sent: Monday, March 13, 2023 4:49 PM
To: Foran, Rosanne
Subject: RE: Comment on Proposed TIA 1692 on NFPA 70

700.32(C) Modifications. If modifications, additions, or deletions to the emergency system(s) occur, selective coordination of the emergency system(s) OCPDs with all supply-side and load-side OCPDs shall be reevaluated.

For a new construction, I do support the TIA 1692.

For existing construction, it is not clear what constitute modification? For old installation, providing selectively coordinated solution can be very costly and may require complete replacement of Upstream and downstream SWBDs and their breakers. Because of such big impact, many owners may decide to postpone immediate retrofits that they would normally conduct.

Same concern applies to 701.32 and 708.

Regards,

Vigen Ghazarian, PE
Principal

iFactor
El Segundo | Orange | Tampa
w iFactor.com

From: Foran, Rosanne <rforan@NFPA.org>
Sent: Monday, March 13, 2023 1:12 PM
To: Vigen Ghazarian <
Subject: RE: Comment on Proposed TIA 1692 on NFPA 70

Mr. Ghazarian,

This will acknowledge receipt of your comment on the subject TIA.

Do you support or oppose TIA No. 1692?

Thank you.

Rosanne

Regards,

Rosanne Foran
Standards Operations Coordinator | **NFPA**
1 Batterymarch Park
Quincy, MA 02169-7471
www.nfpa.org

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From: Vigen Ghazarian

Sent: Thursday, March 9, 2023 12:24 PM

To: Shared TIAs

Subject: Comment on Proposed TIA 1692 on NFPA 70

Couple of notes/suggestions:

One: There is not discussion for multiple generators paralleled to a single bus.

For example:

Case-1: Data Center

3 x 1250kW generators each with 2000A breakers.

The bus is feeding 2x2500A ATS for redundant UPS system.

Suggest to leave burden to EOR to ensure that summation of line side OCPD breakers will behave as one. Or start the study from paralleling gear bus output.

Case-2: Hospital

3 x 1250kW generators each with 2000A breakers.

The bus is feeding life safety, critical and equipment branches.

Equipment branch has a 2000A chiller.

Two: looking to the NEC single lines, it is not clear what series mean.

For non-series example suggest to show more than one OCPD. For example F1 and F2.

For series example show just F.

Thanks,

Vigen Ghazarian, PE
Principal

iFactor

El Segundo | Orange | Tampa

w [iFactor.com](https://ifactor.com)

Foran, Rosanne

From: Richard Litland
Sent: Wednesday, March 15, 2023 8:07 AM
To: Shared TIAs
Subject: Comment on Proposed TIA 1692 on NFPA 70

Support

Richard Litland | Director, Field Team, OMS

Orion Energy Systems, Inc.

<http://www.orionlighting.com>



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