



NATIONAL FIRE PROTECTION ASSOCIATION

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MEMORANDUM

TO: NEC® Correlating Committee
FROM: Sarah Caldwell, *Senior Committee Administrator*
DATE: May 29, 2026
SUBJECT: NEC® CC Proposed TIA No. 1892 **FINAL CC BALLOT RESULTS**

The comment circulation period has now passed, therefore, according to Section 5.7(a) in the NFPA *Regs*, the final results show this TIA **HAS** passed ballot.

10 **Eligible to Vote**
0 **Not Returned**

8 **Agree** (*w/comment: Hickman, Kendall, Porter*)
2 **Disagree** (*Gallo, Krueger*)
0 **Abstain**

There are two criteria necessary to pass ballot [(1) simple majority (2) affirmative vote of $\frac{3}{4}$ of ballots received] to recommend that the Standards Council issue this TIA.

(1) In all cases, an affirmative vote of at least a simple majority of the total membership eligible to vote is required.

$$[10 \text{ eligible} \div 2 = 5 + 1 = \mathbf{(6)}]$$

(2) The number of affirmative votes needed to satisfy the $\frac{3}{4}$ requirement is **8**.
(10 eligible to vote - 0 not returned - 0 abstentions = $10 \times 0.75 = 7.5$)

Ballot comments are attached for your review.

Appeal Closing Date for this TIA is June 3, 2026. Requirements for filing an appeal are addressed by Section 1.6 of the Regulations Governing the Development of NFPA Standards and should be submitted to stds_admin@nfpa.org.

NFPA 70®-2026 Edition
National Electrical Code®

TIA Log No.: 1892

Reference: 625.54

Comment Closing Date: May 20, 2026

Submitter: Bryce Nesbitt, EV Plugbox LLC/EV-Seg

www.nfpa.org/70

1. Revise section 625.54 to read as follows:

625.54 Ground-Fault Circuit-Interrupter Protection for Personnel. Only All-receptacles installed for the connection of electric vehicle charging-EVSE and WPTE shall be required to have ground-fault circuit-interrupter GFCI protection for personnel.

Substantiation: This TIA is submitted on behalf of the task group directed by the NFPA Standards Council in their Decision 25-2. The task group was chaired by Donald Bliss and consisted of the following members: D. Douglas Burkett NEC CMP-12(U), Philip Clark NEC CMP-12(E), Randy Dollar NEC CMP-10(U), Todd Konieczny NEC CMP-12(R/T), Michael Hart Appellant SC D2-25, Todd Lottman NEC CMP 12(M), Rodney T. McGee Appellant SC D2-25, Bryce Nesbitt EV Plugbox LLC/EV-SEg, Scott Picco UL Solutions, Edward Rodriguez NEC CMP 12(I/M), Richard Shawbell NEC CMP 12(L), Clinton Summers NEC CMP 12(I/M), and Sven Thesen NCAC.

This TIA is intended to clarify the implications of SC #D25-2. The task group formed as result has met, and found sufficient emergency nature to forward this TIA to resolve a confusion issue with the code as it exists after the SC action.

While the task group expects the debate on the merits of upstream and downstream residual current devices for EV related circuits to continue in the 2029 NEC revision cycle, there is an urgent need for clarity on the interaction with 625.54 and 210.8(F) now. This same confusion predates the 2026 code.

Reviewing 2017 TIA 17-2 indicates that CMP-12 added the allowance for 240V portable chargers and also added requirements for GFCI protection of receptacles used for EV charging. This change was to increase safety for the consumer interaction point of the unprotected cord, plug, and receptacle at this new higher voltage level.

The technical information provided to the NFPA Standards Council that led to their decision identified a safety hazard for permanently wired EVSE where GFCI is required. This hazard arises from the trip levels between the listed personnel protection system of the EVSE not being compatible with the trip levels of GFCI. In instances of public charging and/or charging at an apartment building, the EV user could be stranded in cases of emergency where the GFCI breaker is not accessible to the user. A cord and plug EVSE does not have the same accessibility issues as permanently wired EVSE.

The proposed text is the minimum change the task group felt would clarify the issue.

The proposed language incorporates defined terms (acronyms) EVSE & WPTE for correlation with the terminology used in Article 625.

Emergency Nature: The NFPA Standard contains a conflict within the NFPA Standard or within another NFPA Standard.

Differing interpretations on the question of upstream GFCI devices for permanently wired EV charging equipment have led to confusion in the field, failed inspections, and inconsistencies even between inspectors within the same AHJ. The current language has led to misapplication of the current requirement. As demonstrated and documented during the SC D25-2 process certain charging situations are incompatible with GFCI devices in wide distribution. The unintended consequences of the current code can cause unwanted tripping and result in issues for many electric vehicles.

NEC CC Log 1892 Ballot Final Report

Election:70_A2028_NEC_AAC_Log1892_CCBallot

Results by Revision

QUESTION: I AGREE there are no CORRELATION ISSUES in accordance with 3.4.2 and 3.4.3 of the NFPA Regs.

Eligible to Vote: 10

Not Returned : 0

Vote Selection

Votes Comments

Agree

8

Palmer L. Hickman

As the TIA ballot has failed, the code remains unchanged. While no correlation issues were noted in the failed TIA or in the balloting, it was not that this TIA was intended to address "conflicts" and that this TAI was emergency in nature. However, the TIA did not pass ballot at the Technical Committee level. The negative ballots appear to recognize the concerns offered in the TIA and found those arguments not persuasive both from a technical and emergency nature basis. I would expect another TIA to be filed if there are correlation issues that need to be addressed.

Alan Manche

Agree

David L. Hittinger

Agree

David H. Kendall

There is not a correlating issue with TIA 1892, however within the substantiation the submitter stated that this proposed revision to 625.54 would modify section 210.8(F). The proposed revision to 625.54 does not modify 210.8(F). CMP-12 put the language in 2017 NEC through a TIA dealing with 240V plug in chargers only. No discussion took place on direct wired until the 2026 Cycle nor does the current code arrangement allow for modification of 210.8(F) by 625.54 as outlets are not addressed in 625.54.

Christine T. Porter

no correlation issues

Roger D. McDaniel

Agree

David A. Williams

Agree

Robert D. Osborne

Agree

Disagree

2

Ernest J. Gallo

The correlation issue between 625.54 and 210.8 is not resolved by this TIA proposal. The concern should be addressed through the normal cycle revision process and not through an emergency TIA.

Kyle Krueger

The language proposed in TIA 1892 does not change the requirement in 625.54. GFCI protection for personnel is still required for receptacles supplying EVSE or WPTE. The correlation issue cited by the submitted still exists with the newly proposed TIA language and 210.8(F).

Abstain

0