

**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](http://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.

Anyone may submit a comment by the closing date indicated above. Please identify the TIA number, state whether you SUPPORT or OPPOSE the TIA along with your comment, and forward to the Secretary, Standards Council. [SUBMIT A COMMENT](#)