

Comments from Electrical Code Public Hearing – 4/16/2026

1-Brian Bauman (NEMA)

“Good morning. I'm with the National Electrical Manufacturers Association, known by the acronym NEMA. Nema is here just to provide testimony. We are in support of the majority of the work that was done by the Electrical Advisory Committee on the review of the 2023 NEC.

Even though we don't agree with all the amendments, it is beyond time that Indiana not be last in the country where they are on NEC coded options. So we do look forward to potentially having the 2023 addition incorporated by reference in the state of Indiana, but what amendments we would like to potentially see reconsidered is AIC 17.1.9-23.

This was the amendment to section 230.85 for emergency disconnects for first responders. I cover code adoption activity in 17 states, Indiana being one of them. What I can say is the states that neighbor Indiana that have incorporated the 2023 NEC have all maintained that section of the code. What the section of the code does is it provides first responders a disconnect means on the outside of the dwelling unit to allow for the quick disconnection of the utility power to the structure if needed in case of a fire or some other instance where removal of power is necessary.

There was some discussion I know when the official committee was meeting that there were 'equipment shortages.' This just is not the case anymore. We're well past the equipment shortages we experienced during Covid and coming out of Covid. So I just ask that this amendment be reconsidered by the state for inclusion because it will improve safety for first responders, if needed. Thank you.”

2-John McCamish (Eaton)

“I'm John McCamish. I'm with Easton. I too applaud Indiana's adoption of the 2023 electrical code. There are so many technologies that have been introduced past the numerous code cycles that the residents of Indiana will be able to take advantage of, but also the inspecting authority will have a panel of enforcement to follow and guidance to follow as well. So that is a great step forward for the state of Indiana and its residents. So I echo the comments of the previous speaker.

A few things I did want to bring to attention that while we do support the adoption of the advancement to the 2023 code and even in in with the some additional advance that you've made into the 2026 code in the area of swimming pools, all of those things are good things.

In regards to a few items, however, there are some safety concerns that I would like to bring up and in NEC section 210.8(f) in regards to the expiration date of the HVAC exception for GFCI protection. The reason why this state, and frankly other states have had concerns about this is for unwanted tripping events at the GFCI. However, even since the last time the electrical committee had a meeting on this, new technology has been developed that would alleviate these concerns.

I strongly encourage you all to investigate what is now known as a high frequency GFCI device. These high frequency devices, although they are mentioned in the 26 code, they are for all intents and purposes, a class A GFCI. But one of the issues that have happened historically with HVAC systems is that because of their application of a variable frequency drive on the HVAC, they have put high frequency round currents on the equipment grounding conductor.

What a high frequency GFCI device does is it takes these higher frequencies into account to minimize unwanted tripping. This research has been done where you have at higher frequencies cases where the frequency is high enough that the human body doesn't even notice or feel it at these higher than 46 milliamps but still safe currents. So strongly encourage for that investigation to take place because this technology has been in the works, and had been worked on, for six years. It is now finally coming and I want to make sure the residents of Indiana can take advantage of those safety concerns.

Another two things that I would like to speak about and they're related to surge protection and this would be in NEC 215.18 and that would relate to 675 IAC 17-1.9-16 and 17 simply encourage the adoption of the model code. A lot of people think surge events are only caused by lightning, but they can be caused by lots of events. Even surge events internal to the home can cause damage to electronic equipment. This is not just a protection of property angle, which is fully acceptable within the scope of the NEC, but this is also concern is concerned with life safety as well. Many of the electronics that are in the home, your GFCI devices, your fire alarm systems, your single station and multi station smoke alarms, all of those are electronics that depend upon surge devices for protection.

And then echoing that would be in NEC 230.67 (IAC 17-1-9-22), I also would encourage the adoption of the model code there for the same reasons that I mentioned earlier. Thanks again."

3-Randy Gulley (Wayne Township Fire Department)

"I'm Randy Gulley from Wayne Township Fire Department, and I was also set on the Committee Advisory Committee. I want to discuss in the electrical code Section 210.12(b).

I'm discussing the fiscal analysis which addresses the Arc Fault Circuit Errors. House Bill 1001 prohibited requiring AFCIs in non-transient housing, which would be one and two family dwelling apartments. So I just wanted to make clear that instead of being a cost impact of \$7,500,000 with the General Assembly's actions this year, that becomes a \$500,000 fiscal savings to take into consideration. Thank you."

4-Dominique Taudin (Carrier Corporation)

"Thank you. So my name is Dominic. I'm here on behalf of Carrier Global Corporation. I wanted to make a comment on the sunset date of the exception for HVAC on the GFCI requirements, section 210.8(f) of the NEC. I made a code change proposal on this. It is true that we are making some progress, both the HVAC industry and the GFCI industry. But, regarding the sunset date that is in the 2023 NEC which is September 1, 2026, I can assure you that the new generation of GFCI will not be available at that date.

That is why my proposal was to remove the sunset date from this cycle, so make an amendment to the NEC to remove the sunset date from this code edition. Maybe the products will be available in the coming years, hopefully, but they will not be widely available by September 1, 2026. It would be up to the GFCI industry to tell, but not before I would say one or two years."

5-Carlie Hopper (Indiana Builders Association)

"Thank you, we appreciate the opportunity to provide comments on the proposed rule to adopt the 2026 Indiana Electrical Code. I'm Carlie Hopper, Governmental Affairs Director of Indiana Builders Association. We are a statewide trade association representing more than 2500 residential builders, developers, remodelers and building industry professionals in Indiana. We thank the members of the fire prevention and Building Safety Commission for establishing an advisory committee and for including a representative of the home building industry to aid in crafting the proposed rule.

We are generally supportive of the proposed rule with the legislature's statutory preemption on the requirements to install AFCIs and appreciate the review committee's support of some of our proposed code changes that align the electrical code with the electrical requirements in the 2020 Indiana Residential Code. Again, thank you for the opportunity to provide comments on the proposed rule and for advancing building codes that increase safety as well as that are practical, cost conscious and maintain housing affordability for Hoosier families."

6-John McCamish (Eaton) (Second Comment)

“In regards to being concerned about availability for a high frequency GFCI not being available by September, or even the idea that they would not be available for one or two years. We are on track to have product by September. But, if there is any doubt to that, I think waiting a full code cycle would be a mistake. If there is a delay that wants to be proposed, do not make it three years. Why should the citizens of Indiana not have a safety device available for them for their homes? Why wait another three years when the product can be available much sooner? So the only delay is waiting until the next code cycle and, given the history, we don’t know when that will be. So I strongly encourage if a delay is desired, even though I don’t think it is necessary, delaying until another code cycle absolutely is not needed.”

7-Dominique Taudin (Carrier Corporation) (Second Comment)

“I would like to reply to the last intervention regarding the removing of the sunset date for the GFCI requirement on HVAC. In theory, I would agree with what has been said, but as far as we don't have a date, I don't feel that we can ourselves fix a new sunset date after September 1, 2026. It will be up to the NFPA eventually to fix a date through tentative interim amendments to the NEC. But I don’t think that anything is in the pipeline to do that. So that's why I suggested to simply delete this sunset date and wait until the next code cycle.

8 - Armand DeBose (Tesla) (Comment received via email)

“Hello, Please see the proposal below regarding 702.4(A) below. To ensure delivery of the submitted proposal please provide a document receipt. Thanks

Proposal:

675 IAC 17-1.9-53 Section 702.4(A); System Capacity

Authority: [IC 22-13-2-2](#); [IC 22-13-2-13](#)

Affected: [IC 22-12](#); [IC 22-13](#); [IC 22-14](#); [IC 22-15](#); [IC 36-7](#)

Sec. 53. Amend Section 702.4(A) to include 2026 NEC Section 702.4(A)(3) and remove “Article 130 PART II” to replace with “750.30” to match the correct section references in the 2023 NEC.

Substantiation:

2023 NEC 702.4 does not account for multimode inverter-based systems evaluated for PCS overload control.”

9 – Brian Spaulding (Indiana Apartment Association) (Comment received via email)

I am writing on behalf of the Indiana Apartment Association (IAA), representing owners, operators, and developers of rental housing across Indiana. IAA represents nearly 300,000 professionally managed apartment homes statewide. On behalf of our members, I extend our appreciation to the members of the Indiana Electrical Code Subcommittee and the Fire Prevention and Building Safety Commission for their diligence and continued efforts in advancing updates to Indiana’s electrical code. We write this letter in support of the electrical code proposed final rule along with pre-emptions on ArcFault Circuit Interrupters in state statute (HEA 1001-2026). We appreciate the support of DHS and Governor Braun in advancing this rule and HEA 1001-2026. We appreciate the work that has gone into bringing this rule to final adoption. Establishing updated, consistent electrical standards is critical to ensuring safe and reliable housing for residents across Indiana, and we commend the Subcommittee for seeing this process through. We also want to recognize the Indiana General Assembly for its leadership in ensuring progress continued on critical code updates. Their engagement helped provide needed direction and we are grateful for their commitment to advancing these important policies. Please let us know if you have any questions. We appreciate your consideration.