

**NFPA 70®-2017 Edition**  
**National Electrical Code®**

**TIA Log No.: 1357**

**Reference:** 695.14(F) and 700.10(D)(3)

**Comment Closing Date: May 17, 2018**

**Submitter:** Timothy Windey, Cummins Power Generation

[www.nfpa.org/70](http://www.nfpa.org/70)

1. *Revise 695.14(F) to read as follows:*

**695.14 (F) Generator Control Wiring Methods.** Control conductors installed between the fire pump power transfer switch and the standby generator supplying the fire pump during normal power loss shall be kept entirely independent of all other wiring. The integrity of the generator ~~control wiring remote start circuit~~ shall be ~~continuously~~ monitored ~~for broken, disconnected, or shorted wires~~. Loss of integrity of the ~~remote start circuit(s)~~ shall ~~initiate visual and audible annunciation of generator malfunction at the generator local and remote annunciator(s) and start the generator(s)~~.

2. *Revise 700.10(D)(3) to read as follows:*

**700.10(D)(3) Generator Control Wiring.** Control conductors installed between the transfer equipment and the emergency generator shall be kept entirely independent of all other wiring and shall meet the conditions of 700.10(D)(1). The integrity of the generator ~~control wiring remote start circuit~~ shall be ~~continuously~~ monitored ~~for broken, disconnected, or shorted wires~~. Loss of integrity of the ~~remote start circuit(s)~~ shall ~~initiate visual and audible annunciation of generator malfunction at the generator local and remote annunciator(s) and start the generator(s)~~.

**Substantiation:** This proposed TIA addresses significant issues with generator control wiring. These requirements exist in Article 695 for Fire Pumps and Article 700 for Emergency Systems. The existing requirements and the proposed revisions of this TIA are, with respect to generator control, identical.

This TIA is necessary to address well intended revisions in the 2017 revision cycle of the NEC that in application, create conflict, confusion and hardship for installer/maintainers and enforcers.

The well-intended 2017 revisions mandate continuous monitoring of the integrity of the generator control wiring for fire pump installations (695.14(F)) and for emergency systems (700.10(D)(3)). Additionally, the 2017 changes mandate that if there is a loss of integrity of the remote start circuit(s), there must be a visual and audible annunciation of generator malfunction at the generator local and remote annunciator(s). The loss of integrity must also start the generator(s).

The goal of these revisions was to immediately inform building occupants that a problem has occurred.

Practical application of these revisions is extremely subjective and confusing. The issues created include but are not limited to the following:

Adverse Impact #1:

One significant problem with this new requirement, is that it's too vague. What does "integrity of the generator control wiring shall be continuously monitored" really mean? This makes these requirements extremely difficult to enforce as every installation is different and each AHJ will have different opinions on how to enforce an extremely subjective requirement. This is driving solutions that are all over the map,

which is adding significant amounts of unnecessary costs and making clear, consistent enforcement impossible.

**Adverse Impact #2:**

Another significant issue resulting from the 2017 revisions, is that no generator manufacturer can do this with products that exist today; without adding an extra layer of hardware and wiring which makes these life safety systems more complicated and less reliable. This is readily seen where simpler start circuit architectures are all that is necessary.

**Adverse Impact #3:**

Another significant issue is how to get this done. Responsibilities are unclear. For example, is the generator manufacturer responsible for the integrity monitoring of the control wiring (which will then start the generator and annunciate the alarm), or is it the automatic transfer switch manufacturer, or the systems integrator, or another party, or a combination of the listed parties? The present text leads to significant confusion.

**Adverse Impact #4:**

Finally, the requirement for visible and audible annunciation is covered thoroughly in NFPA 110 *Standard for Emergency and Standby Power Systems*. This creates a clear and unmistakable conflict between two NFPA documents.

This TIA was intentionally delayed until NEC CMP-13 had an opportunity to act on public inputs related to the problems addressed in this TIA. The proposed revisions of this TIA reflect the actions taken by CMP-13 during the First Draft meetings in Hilton Head, SC. To solve these problems, CMP-13 deleted the 2017 revisions and added text that provides clarity for generator remote start circuits.

**Emergency Nature:** This is of an emergency nature due to factor 5.4(e), which states “*The proposed TIA intends to correct a circumstance in which the revised NFPA Standard has resulted in an adverse impact on a product or method that was inadvertently overlooked in the total revision process*”. Please see the section above for the multiple adverse impacts.

This TIA is necessary to:

- Provide requirements that are achievable, consistent and enforceable without compromising these life safety systems by making generator control more complex and less reliable.
- Eliminate subjective requirements driving solutions that are all over the map. This is necessary to provide installers, manufacturers and enforcers with clear concise text that is easy to read, practical and enforceable.
- Provide clear prescriptive requirements to correlate equipment and installation requirements.
- Eliminate a conflict between NFPA 110 the *Standard for Emergency and Standby Power Systems* and the NEC. The requirement for visible and audible annunciation is covered thoroughly in NFPA 110 making the 2017 revisions a clear and unmistakable conflict between two NFPA documents.



# NATIONAL FIRE PROTECTION ASSOCIATION

The leading information and knowledge resource on fire, electrical and related hazards

## MEMORANDUM

**TO:** NEC® Code-Making Panel 13

**FROM:** Sarah Caldwell, *Project Administrator*

**DATE:** May 4, 2018

**SUBJECT:** NFPA 70 Proposed TIA No. 1357 **PRELIMINARY TC BALLOT RESULTS**

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According to 5.6(a) in the NFPA *Regs*, the preliminary results show this TIA **HAS** achieved the ¾ majority vote needed on both Ballot Item No. 1 (**Technical Merit**) and Ballot Item No. 2 (**Emergency Nature**).

**22 Eligible to Vote**  
**3 Not Returned** (*Degnan, Paulsen, Savage, Sr.*)

**Technical Merit:**

0 Abstentions  
18 Agree (*w/comment: White*)  
1 Disagree (*Kovacik*)

**Emergency Nature:**

0 Abstentions  
19 Agree  
0 Disagree

There are two criteria necessary to pass ballot [(1) simple majority (2) affirmative ¾ vote]. Both questions must pass ballot in order 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.

$$[22 \text{ eligible} \div 2 = 11 + 1 = \mathbf{(12)}]$$

(2) The number of affirmative votes needed to satisfy the ¾ requirement is **15**.  
(22 eligible to vote - 3 not returned - 0 abstentions = 19 × 0.75 = 14.25)

Ballot comments are attached for your review.

This proposed TIA has been published for public comment in the April 2018 issue of *NFPA News* with a Public Comment Closing Date of May 17, 2018. Any public comments received will be circulated to the committee.

Attachment

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2. *Revise 700.10(D)(3) to read as follows:*

**700.10(D)(3) Generator Control Wiring.** Control conductors installed between the transfer equipment and the emergency generator shall be kept entirely independent of all other wiring and shall meet the conditions of 700.10(D)(1). The integrity of the generator ~~control wiring~~ remote start circuit shall be ~~continuously~~ monitored ~~for broken, disconnected, or shorted wires~~. Loss of integrity of the ~~remote start circuit(s)~~ shall ~~initiate visual and audible annunciation of generator malfunction at the generator local and remote annunciator(s) and start the generator(s)~~.

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**NEC® CODE-MAKING PANEL 13 LETTER BALLOT**  
**PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1357**  
To revise 695.14(F) and revise 700.10(D)(3) of the 2017 Edition of  
NFPA 70, *National Electrical Code*®

**Ballot Item No. 1:**

I agree with the **TECHNICAL MERITS** of the Proposed TIA to revise 695.14(F) and revise 700.10(D)(3)

  X   **AGREE**                                 **DISAGREE\***                                 **ABSTAIN\***

**EXPLANATION OF VOTE** - Please type or print your comments:

\*An explanation shall accompany a “disagree” or “abstain” vote.

\_\_\_\_\_  
\_\_\_\_\_

**Ballot Item No. 2:**

I **AGREE** that the subject is of an **EMERGENCY NATURE\*** for one or more of the following reasons (Check all that apply):

- X        A.      The standard contains an error or an omission that was overlooked during the regular revision process.
- B.      The NFPA Standard contains a conflict within the NFPA Standard or with another NFPA Standard.
- C.      The proposed TIA intends to correct a previously unknown existing hazard.
- D.      The proposed TIA intends to offer to the public a benefit that would lessen a recognized (known) hazard or ameliorate a continuing dangerous condition or situation.
- E.      The proposed TIA intends to accomplish a recognition of an advance in the art of safeguarding property or life where an alternative method is not in current use or is unavailable to the public.
- F.      The proposed TIA intends to correct a circumstance in which the revised NFPA Standard has resulted in an adverse impact on a product or method that was inadvertently overlooked in the total revision process or was without adequate technical (safety) justification for the action.

       **ABSTAIN**

       **DISAGREE** The TIA does not meet any of the regulations above warranting a TIA, therefore the TIA is **NOT** of emergency nature

**EXPLANATION OF VOTE** - Please type or print your comments:

\* An explanation must accompany a “disagree” or “abstain” vote.

\_\_\_\_\_  
\_\_\_\_\_

  Martin D. Adams    
Signature

  4/18/18    
Date

*Martin D. Adams*

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\_\_\_\_\_  
Signature                      Larry Ayer

\_\_\_\_\_  
Date                      4-24-2018

\_\_\_\_\_  
Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*

NFPA

1 Batterymarch Park

Quincy, MA 02169

**FAX: (617) 984-7110**

**E-mail: [scaldwell@nfpa.org](mailto:scaldwell@nfpa.org)**



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**April 24, 2018**

Signature

Date

Steve Baldwin

---

Name (Please Print)

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NFPA

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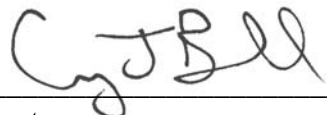
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\_\_\_\_\_

Signature

\_\_\_\_\_ 4/20/2018  
Date

Greg J. Ball

Name (Please Print)

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\_\_\_\_\_  
Signature

4-11-2018  
Date

Daniel J. Caron

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Name (Please Print)

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*Patrick D. Cunniff Jr.*  
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 Signature

4/10/18  
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 Date

Richard D. Currin Jr.  
Name (Please Print)

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11 April 2018

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Signature

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Date

NEIL CZARNECKI

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Name (Please Print)

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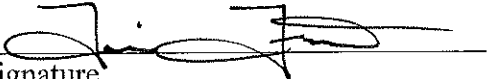
**ABSTAIN**

**DISAGREE** The TIA does not meet any of the regulations above warranting a TIA, therefore the TIA is **NOT** of emergency nature

**EXPLANATION OF VOTE** - Please type or print your comments:

\* An explanation must accompany a "disagree" or "abstain" vote.

\_\_\_\_\_  
\_\_\_\_\_

  
Signature

4/19/2018  
Date

TRAVIS FOSTER  
Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*  
NFPA  
1 Batterymarch Park  
Quincy, MA 02169

**FAX: (617) 984-7110**

**E-mail: [scaldwell@nfpa.org](mailto:scaldwell@nfpa.org)**

**NEC<sup>®</sup> CODE-MAKING PANEL 13 LETTER BALLOT**

**PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1357**

To revise 695.14(F) and revise 700.10(D)(3) of the 2017 Edition of  
NFPA 70, *National Electrical Code*<sup>®</sup>

**Ballot Item No. 1:**

I agree with the **TECHNICAL MERITS** of the Proposed TIA to revise 695.14(F) and revise 700.10(D)(3)

    X     **AGREE**                                           **DISAGREE\***                                           **ABSTAIN\***

**EXPLANATION OF VOTE** - Please type or print your comments:

\*An explanation shall accompany a "disagree" or "abstain" vote.

**Ballot Item No. 2:**

**I AGREE** that the subject is of an **EMERGENCY NATURE\*** for one or more of the following reasons (Check all that apply):

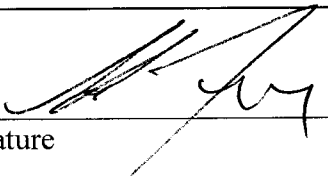
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           **ABSTAIN**

           **DISAGREE** The TIA does not meet any of the regulations above warranting a TIA, therefore the TIA is **NOT** of emergency nature

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\_\_\_\_\_  
Signature

4/24/18  
\_\_\_\_\_  
Date

Steven Froemming  
Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*

NFPA

1 Batterymarch Park

Quincy, MA 02169

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**NEC® CODE-MAKING PANEL 13 LETTER BALLOT**  
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To revise 695.14(F) and revise 700.10(D)(3) of the 2017 Edition of  
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  X   **AGREE**                                 **DISAGREE\***                                 **ABSTAIN\***

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\_\_\_\_\_  
\_\_\_\_\_

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           **ABSTAIN**

           **DISAGREE** The TIA does not meet any of the regulations above warranting a TIA, therefore the TIA is **NOT** of emergency nature

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\_\_\_\_\_  
\_\_\_\_\_

Jeff Jonas  
Signature

4-24-2018  
Date

Jeff Jonas  
Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*

NFPA

1 Batterymarch Park

Quincy, MA 02169

**FAX: (617) 984-7110**

**E-mail: [scaldwell@nfpa.org](mailto:scaldwell@nfpa.org)**



**NEC® CODE-MAKING PANEL 13 LETTER BALLOT  
PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1357**

To revise 695.14(F) and revise 700.10(D)(3) of the 2017 Edition of  
NFPA 70, *National Electrical Code*®

**Ballot Item No. 1:**

I agree with the **TECHNICAL MERITS** of the Proposed TIA to revise 695.14(F) and revise 700.10(D)(3)

**AGREE**                       **DISAGREE\***                       **ABSTAIN\***

**EXPLANATION OF VOTE** - Please type or print your comments:

\*An explanation shall accompany a “disagree” or “abstain” vote.

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**ABSTAIN**

**DISAGREE** The TIA does not meet any of the regulations above warranting a TIA, therefore the TIA is **NOT** of emergency nature

**EXPLANATION OF VOTE** - Please type or print your comments:

\* An explanation must accompany a “disagree” or “abstain” vote.

---

---

Robert Jordan  
Signature

4/11/18  
Date

Robert Jordan  
Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*

NFPA

1 Batterymarch Park

Quincy, MA 02169

**FAX: (617) 984-7110**

**E-mail: [scaldwell@nfpa.org](mailto:scaldwell@nfpa.org)**

**NEC® CODE-MAKING PANEL 13 LETTER BALLOT  
PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1357**

To revise 695.14(F) and revise 700.10(D)(3) of the 2017 Edition of  
NFPA 70, *National Electrical Code*®

**Ballot Item No. 1:**

I agree with the **TECHNICAL MERITS** of the Proposed TIA to revise 695.14(F) and revise 700.10(D)(3)

\_\_\_\_\_ **AGREE**                      \_\_\_\_\_ **X** \_\_\_\_\_ **DISAGREE\***                      \_\_\_\_\_ **ABSTAIN\***

**EXPLANATION OF VOTE** - Please type or print your comments:

\*An explanation shall accompany a “disagree” or “abstain” vote.

\_\_\_\_\_  
Please refer to the explanation below.

**Ballot Item No. 2:**

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\_\_\_\_\_ **ABSTAIN**

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\* An explanation must accompany a “disagree” or “abstain” vote.

\_\_\_\_\_  
  
\_\_\_\_\_

\_\_\_\_\_  
Signature

April 12, 2018  
\_\_\_\_\_  
Date

John Kovacik  
\_\_\_\_\_  
Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018**.

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*  
NFPA  
1 Batterymarch Park  
Quincy, MA 02169

**FAX: (617) 984-7110**

**E-mail: [scaldwell@nfpa.org](mailto:scaldwell@nfpa.org)**

**Explanation of Negative Vote for Technical Merits:**

I agree that changes are needed to address the well-intended revisions in the 2017 revision cycle of the NEC that in application, create conflict, confusion and hardship for installer/maintainers and enforcers. However, I do not agree with the revisions being proposed in this TIA.

The revisions in the 2017 cycle attempted to improve the “integrity” of the wiring of the remote start circuit(s) by introducing the need for continuous monitoring of the circuits. Providing this capability has been a technical challenge for generator and transfer switch manufacturers. The intent and application of these revisions were taken up in a recent discussion with several fire pump controller manufacturers. The discussion ended in a recommendation to delete the last two sentences of 695.14(F) and 700.10(D)(3) as shown below.

**695.14(F) Generator Control Wiring Methods.** Control conductors installed between the fire pump power transfer switch and the standby generator supplying the fire pump during normal power loss shall be kept entirely independent of all other wiring. ~~The integrity of the generator control wiring shall be continuously monitored. Loss of integrity of the remote start circuit(s) shall initiate visual and audible annunciation of generator malfunction at the generator local and remote annunciator(s) and start the generator(s).~~

**700.10(D)(3) Generator Control Wiring.** Control conductors installed between the transfer equipment and the emergency generator shall be kept entirely independent of all other wiring and shall meet the conditions of 700.10(D)(1). ~~The integrity of the generator control wiring shall be continuously monitored. Loss of integrity of the remote start circuit(s) shall initiate visual and audible annunciation of generator malfunction at the generator local and remote annunciator(s) and start the generator(s).~~

The following reasons are given for substantiating the removal of these sentences.

1. The method of providing continuous monitoring while maintaining reliable remote start circuit(s) is subject to widely varying interpretation by AHJs and manufacturers. Solutions add various levels of complexity in either partially or fully meeting the requirements depending on interpretation.
2. Starting of the generator on loss of integrity of the remote start circuit(s) is not necessary and will, in most cases, not serve to provide power to fire pump or emergency system loads because the actual need to start the generator in almost all cases may not exist. The generator is simply being started due to

open, shorted, or grounded control wiring, not due to the need for the generator power source. This may result in loss of overall system integrity by unnecessarily expending generator fuel.

3. The 2017 NEC and the present proposals that attempt to resolve issues related to clarity do not resolve the underlying problem of adding complexity to prevent a loss of integrity in remote start circuit(s) in fire pump and emergency systems. There does not appear to be any evidence that loss of integrity of remote start circuit(s) has been an issue in fire pump and emergency systems. The addition of the required level of complexity through the introduction of components other than protected field wiring and remote start circuit contacts may unintentionally result in creating issues that reduce integrity.
4. Engine generator sets supplying emergency or standby power to fire pump assemblies are required to be tested routinely in accordance with NFPA 25 and NFPA 110.

**NEC® CODE-MAKING PANEL 13 LETTER BALLOT  
PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1357**

To revise 695.14(F) and revise 700.10(D)(3) of the 2017 Edition of  
NFPA 70, *National Electrical Code*®

**Ballot Item No. 1:**

I agree with the **TECHNICAL MERITS** of the Proposed TIA to revise 695.14(F) and revise 700.10(D)(3)

  X   **AGREE**                                 **DISAGREE\***                                 **ABSTAIN\***

**EXPLANATION OF VOTE** - Please type or print your comments:

\*An explanation shall accompany a "disagree" or "abstain" vote.

**Ballot Item No. 2:**

I **AGREE** that the subject is of an **EMERGENCY NATURE\*** for one or more of the following reasons (Check all that apply):

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\* An explanation must accompany a "disagree" or "abstain" vote.

  Linda J. Little    
Signature

  4/12/2018    
Date

Linda J. Little

Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*

NFPA

1 Batterymarch Park

Quincy, MA 02169

**FAX: (617) 984-7110**

**E-mail: [scaldwell@nfpa.org](mailto:scaldwell@nfpa.org)**





GREG MARCHANT

Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*

NFPA

1 Batterymarch Park

Quincy, MA 02169

**FAX: (617) 984-7110**

**E-mail: [scaldwell@nfpa.org](mailto:scaldwell@nfpa.org)**

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PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1357**

To revise 695.14(F) and revise 700.10(D)(3) of the 2017 Edition of  
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**Ballot Item No. 1:**

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---

---

  Daniel R Neeser    
Signature

  4-17-18    
Date

\_\_\_\_ Daniel R Neeser \_\_\_\_\_  
Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*

NFPA

1 Batterymarch Park

Quincy, MA 02169

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PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1357**

To revise 695.14(F) and revise 700.10(D)(3) of the 2017 Edition of  
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**Ballot Item No. 1:**

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**AGREE**                       **DISAGREE\***                       **ABSTAIN\***

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Signature

04/24/2018  
Date

---

Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*

NFPA

1 Batterymarch Park

Quincy, MA 02169

**FAX: (617) 984-7110**

**E-mail: [scaldwell@nfpa.org](mailto:scaldwell@nfpa.org)**

**NECC® CODE-MAKING PANEL 13 LETTER BALLOT**  
**PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1357**  
To revise 695.14(F) and revise 700.10(D)(3) of the 2017 Edition of  
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**Ballot Item No. 1:**

I agree with the **TECHNICAL MERITS** of the Proposed TIA to revise 695.14(F) and revise 700.10(D)(3)

**AGREE**

**DISAGREE\***

**ABSTAIN\***

**EXPLANATION OF VOTE** - Please type or print your comments:

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4/25/2018  
Date

Signature

Kendall Waterman  
Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*  
NFPA

1 Batterymarch Park

Quincy, MA 02169

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**AGREE**                       **DISAGREE\***                       **ABSTAIN\***

**EXPLANATION OF VOTE** - Please type or print your comments:

\*An explanation shall accompany a "disagree" or "abstain" vote.

This revision is needed to ensure the Section's requirements are obtainable and enforceable

**Ballot Item No. 2:**

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Signature

4/11/2018

Date

Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**



**NEC® CODE-MAKING PANEL 13 LETTER BALLOT**  
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\_\_\_\_\_  
*Tracy P. W...*  
Signature

4-12-18  
\_\_\_\_\_  
Date

Timothy P. Windey  
Name (Please Print)

Please return the ballot on or before **Tuesday, April 24, 2018.**

**PLEASE RETURN TO:**

Sarah Caldwell, *Technical Committee Administrator*

NFPA

1 Batterymarch Park

Quincy, MA 02169

**FAX: (617) 984-7110**

**E-mail: [scaldwell@nfpa.org](mailto:scaldwell@nfpa.org)**