

## Keeler, Erika

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**From:** Walls, Dave  
**Sent:** Tuesday, September 22, 2009 2:01 PM  
**To:** Doug Hensel; Nearman, Michael; Keeler, Erika  
**Subject:** FW: Public Comment- HCD Proposed Action Regarding National Electrical Code 550 and 551

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**From:** Terry Szalai [mailto:terry@suite16-sr.com]  
**Sent:** Thursday, September 17, 2009 1:34 PM  
**To:** CBSC (General Mail)  
**Subject:** Public Comment- HCD Proposed Action Regarding National Electrical Code 550 and 551

Dear sirs:

As noted in the initial statement of reasons, HCD proposes not to adopt NEC 550 (Mobile Homes, Manufactured Homes and Mobile Home Parks) and NEC 551 (Recreational Vehicles and Recreational Vehicle Parks) because "the regulations covered by these articles do not fall within the occupancies regulated by HCD."

This statement appears to be inaccurate, as HCD is the regulating agency for mobile home and RV parks. Please consider revising the statement of reasons and/or consider adopting the widely-accepted national authority for electrical safety (NEC) for these occupancies.

We understand that HCD enforces the electrical regulations for mobile home and RV parks as found in Title 25, Division 1, Chapters 2 and 2.2, and in the case of grounding these regulations are in conflict with the unadopted sections NEC 550 and 551, and in conflict with the adopted section NEC 250 as follows:

1. Title 25 Div 1, Chapters 2 and 2.2, Sections 1158, 1164, 2158 and 2164 require that both the ground conductor and the neutral conductor both be connected to each other and the ground electrode (ground rod) at each individual lot service. This is in conflict with NEC 550.16, 551.76 and 250.24, for the reason that the ground wire now becomes a parallel current-carrying conductor with the neutral conductor, a potentially hazardous and NEC-forbidden condition.
2. Title 25 Div 1, Chapters 2 and 2.2, Sections 1154 and 2154 require that a ground conductor be run with all feeders to the individual lot services. If this was not a requirement, the Title 25 regulations listed in #1 above would be Code-legal and required per NEC 250.32(B)(2).

We recommend that HCD correct the Title 25 regulations to be in compliance with at least NEC 250.

Portions of Title 25 and HCD's initial statement of reasons are reprinted below for your convenience.

Thank you for your help, and please contact me with any questions or to discuss further.

TERRY SZALAI, P.E.  
TECHNICAL/QUALITY ADVISOR

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## **CHAPTER 5 SPECIAL OCCUPANCIES**

HCD proposes to adopt Articles 518, 545, and 590 of Chapter 5 without amendment.

HCD proposes to **not** adopt Articles 500, 501, 502, 503, 504, 505, 506, 510, 511, 513, 514, 515, 516, 517, 520, 522, 525, 530, 540, 547, 550, 551, 552, 553, and 555 of Chapter 5. The regulations covered by these articles do not fall within the occupancies regulated by HCD.

### **§ 1154. Primary System Grounding- 600 Volts or Less.**

(a) When the park electrical service is supplied by a grounded system operated at 600 volts or less, an equipment grounding conductor shall be run with the feeders of the park primary electrical system to all equipment supplied by the primary electrical system.

(b) Park primary electrical systems within the park operated at 600 volts or less supplied by an ungrounded system shall not be grounded.

### **§ 1158. Secondary Systems- Lot Service Equipment.**

The neutral conductor of all secondary systems supplying lot service equipment shall be grounded at both the secondary system source and the lot service equipment.

### **§ 1164. Feeder Assembly.**

The neutral conductor and the equipment grounding conductor of the feeder assembly supplying service equipment, shall be connected to the grounding electrode at each lot service enclosure.

### **§ 2154. Primary System Grounding- 600 Volts or Less**

(a) When the park electrical service is supplied by a grounded system operated at 600 volts or less, an equipment grounding conductor shall be run with the feeders of the park primary electrical system to all equipment supplied by the primary electrical system.

(b) Park primary electrical systems within the park operated at 600 volts or less supplied by an ungrounded system shall not be grounded.

### **§ 2158. Secondary Systems- Lot Service Equipment.**

The neutral conductor of all secondary systems supplying lot service equipment shall be grounded at both the secondary system source and the lot service equipment.

### **§ 2164. Feeder Assembly.**

The neutral conductor and the equipment grounding conductor of the feeder assembly supplying service equipment shall be connected to the grounding electrode at each lot service enclosure.