

Attachment 4 – Summary of Public Comments and Department Responses

| | Topic | Provision | Comments/Recommendations | Department Response |
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| 1 | Electrical inspections. | SPS 316.013: SECTION 47 Pg. 25 | Commenter states new subchapter 2 has statewide commercial inspections but doesn't include 1 or 2 family dwellings, which he feels should be included. | Rules regarding inspection of 1 and 2 family dwellings are addressed under the Uniform Dwelling Code. No changes were made to the proposed rule. |
| 2 | GFCI requirement for protection within 6 feet of a kitchen sink in a dwelling unit. | SPS 316.210 (1) (a): SECTION 55 Pg. 27 | Several commenters recommend including this requirement, indicating safety concerns outweigh installation costs. One commenter states there would be no cost increase for a typical dwelling, as this requirement would only affect a minimal amount of receptacles in most dwellings. | Outlets serving countertops in kitchens already require GFCI. This would affect some refrigerator outlets, potentially risking loss of refrigeration. No changes were made to the proposed rule. |
| 3 | GFCI requirement for protection within 6 feet of a bath or shower and laundry area of a dwelling unit. | SPS 316.210 (1) (b): SECTION 55 Pg. 27 | Several commenters recommend including this requirement, indicating safety concerns outweigh installation costs. One commenter states installation of a tub or shower outside of a bathroom is uncommon and the required GFCI installation would cost from \$10-\$30, and installation in a laundry area would be low cost. | A bath or laundry room with a basin is already covered. No data has been provided to support an increase in the level of regulation. No changes were made to the proposed rule. |
| 4 | GFCI requirement for all single-phase receptacles rated 150 volts to ground or less, 50 amperes or less; and three-phase receptacles rated 150 volts to ground or less, 100 amperes or less. | SPS 316.210 (1) (c): SECTION 55 Pg. 27 | Several commenters recommend including this requirement, indicating safety concerns outweigh installation costs. One commenter states new GFCI technology allows additional higher amperage receptacles in commercial and industrial occupancies. | This is a large expansion of GFCI receptacles, not just branch circuits, and requires newly developed products. No data has been provided to support an increase in the level of regulation. No changes were made to the proposed rule. |
| 5 | GFCI requirement for crawlspaces at or below grade level and unfinished portions or areas of the basement not intended as habitable rooms in other than dwelling units. | SPS 316.210 | Several commenters recommend including this requirement, indicating safety concerns outweigh installation costs. One commenter states the majority of these buildings do not have this type of area; therefore the number of required GFCI devices would also be minimal in numbers. | The Department has accepted this recommendation. |
| 6 | GFCI requirement for dishwashers in dwelling units. | SPS 316.210 | Several commenters recommend including this requirement, indicating safety concerns outweigh installation costs. One commenter states the cost of a GFCI device is less than \$10.00 per kitchen per dwelling unit. | The Department has accepted this recommendation. |

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| 7 | Requirement for dwelling unit garages: at least one 120-volt, 20-ampere branch circuit shall be installed to supply receptacle outlets. Applies to attached garages and detached garages with electric power. | SPS 316.210 (2) (b): SECTION 55 Pg. 27 | Commenter recommends including this requirement, indicating that while this new NEC requirement is an additional cost to a new home, the 20-amp circuit is a benefit to the homeowner and the initial installation cost is far less than installing a 20-amp circuit after the home is dry walled. | This is a convenience option for owners who would like to install them and not a safety issue. No changes were made to the proposed rule. |
| 8 | AFCI requirement for kitchens and laundry areas in dwelling units. | SPS 316.210 (3): SECTION 55 Pg. 27 | Several commenters recommend including this requirement, indicating safety concerns outweigh installation costs. One commenter states AFCI in laundry areas is currently required by the State of Wisconsin as "similar areas," so there is no additional cost for this clarification within the NEC. | The Department has accepted the recommendation concerning laundry areas. No data has been submitted that links the lack of AFCI in kitchens to specific fires. No changes concerning kitchens were made to the proposed rule. |
| 9 | AFCI requirement for dormitories. | SPS 316.210 | Several commenters recommend including this requirement, indicating safety concerns outweigh installation costs. | The Department has accepted this recommendation. |
| 10 | AFCI requirement for guest rooms and suites of hotels and motels. | SPS 316.210 | Several commenters recommend including this requirement, indicating safety concerns outweigh installation costs. | The Department has accepted this recommendation. |
| 11 | Requirement for at least one receptacle outlet in each vehicle bay in a dwelling unit garage. An outlet may not be more than 1.7 m (5 1/2 ft) above the floor. | SPS 316.210 (7): SECTION 56 Pg. 27 | Commenter recommends including this requirement, indicating the additional receptacles are a benefit to the homeowner and there would be a minimal installation cost of \$20 for each additional receptacle. | This is a convenience option for owners who would like to install them and not a safety issue. No changes were made to the proposed rule. |
| 12 | Requirement for a minimum number of receptacles in meeting rooms. | SPS 316.210 (8): SECTION 56 Pg. 27 | Commenter recommends including this requirement, indicating it will eliminate the use of extension cords and increase the safety of the electrical wiring. | This is a convenience option for owners who would like to install them and not a safety issue. No changes were made to the proposed rule. |
| 13 | Conductors for general wiring. | SPS 316.310 | Commenter is against this change as it allows conductors to be bundled. | The Department reviewed the comment and no changes were made to the proposed rule. |
| 14 | For switches controlling lighting loads, requirement for installation of the grounded conductor at the switch location. | SPS 316.404: SECTION 77 Pg. 32 | Commenter recommends including this requirement, as it is presently a requirement in the 2011 NEC and reduces possible shock hazards. | The Department reviewed the comment and no changes were made to the proposed rule. |

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| 15 | Requirement that receptacle outlet boxes for receptacles of 15- and 20-ampres in a wet location be listed and identified as "extra duty." | SPS 316.406 (2): SECTION 79 Pg. 32 | Commenter recommends including this requirement, indicating extra duty covers will cost building owners less money as, unlike less expensive covers, they will not need to be replaced. | This is an option for owners who would like to install them. No data has been provided to support an increase in the level of regulation. No changes were made to the proposed rule. |
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