HOUSING FIRST
MINNESOTA℠

December 1, 2022

Board of Electricity 2023 NEC Adoption Committee
443 Lafayette Road
St. Paul, MN 55155

Re: 2023 National Electric Code Comments

Via Electronic Delivery

Members of the 2023 NEC Adoption Committee,

On behalf of our members, Housing First Minnesota thanks the Board of Electricity for conducting a more transparent and rigorous technical review of the 2023 National Electrical code. Earlier, we asked the this body perform ta technical review which mirrors that of the Plumbing Board and Construction Codes Advisory Council. Increasing the number of meetings and holding discussion on each and every major change is a welcome and commendable.

There are, however, areas in which the Board and its process can improve:

- Some members of the committee appeared to approach the housing industry's opposition to some code changes as something to be defended or debated, not investigated. As illustrated by the TIA issued for 210.8(f) in the 2020 NEC, the publishers of the code books make errors, and bodies that oversee local code adoption must perform standard oversight and review.
- As noted by a member of this committee, there are more factors at play in performing a cost analysis than provided by the committee. Limiting a cost analysis to research on component prices as listed on a home improvement store website is simply not sufficient, nor reflective of actual costs relating to regulatory mandates in the context of building projects.
- While sometimes received with substantial skepticism by members of the committee, Minnesota's housing affordability and access challenges are immense and certainly deserving of serious review from appointed policy makers in the housing space.

As stated throughout this process by Housing First Minnesota, as well as to other key housing regulators, this is the time to lower housing costs, not raise them.

Please contact me with any questions at nick@housingfirstmn.org or (651) 697-7586.

Sincerely,

Nicholas Erickson
Senior Director of Housing Policy
Housing First Minnesota