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November 22, 2022

Amanda Spuckler dli.rules@state.mn.us Minnesota Department of Labor and Industry 443 Lafayette Road St. Paul, MN 55155

Re: Proposed Amendment to Rules Governing the Adoption of the 2023 National Electrical Code, Minnesota rules chapter 1315.

IBEW Local 110 urges the earliest possible adoption and without amendment of the 2023 National Electrical Code/NFPA 70.

IBEW Local 110 represents nearly 2,500 members in the electrical industry. These members rely on and use the NEC on a daily basis to complete their projects to a standard that is second to none.

Any modifications or amendments to the NEC will only cause confusion, increase costs, and potentially increase safety risks to the citizens of Minnesota.

The National Electrical Code adoption process, at the National level, was conducted through an open, transparent process incorporating many opportunities from multiple industry stakeholders to provide comment on proposed changes. In Minnesota the NEC 2023 adoption review committee conducted a transparent open forum of analysis consisting of several public meetings providing extensive input from stakeholders from Minnesota representing multiple interests from all areas of the Electrical and Construction Industry.

For these reasons, IBEW Local 110 urges the earliest possible effective date for adoption of the 2023 NEC without amendment in order to protect the public health and safety of the residents of Minnesota and to provide an efficient and cost-effective transition from the previous code.

Sincerely,

Jamie McNamara

Business Manager/Financial Secretary

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International Brotherhood of Electrical Workers Local 110