

FORM FOR COMMENT FOR 2014 NATIONAL ELECTRICAL CODE®

INSTRUCTIONS — PLEASE READ CAREFULLY

Type or print **legibly**. Use a separate copy for each comment. Limit each comment to a **SINGLE** section. All comments **must be received by NFPA by 5 p.m., EDST, Wednesday, October 17, 2012**, to be considered for the 2014 National Electrical Code. Comments received after 5:00 p.m., EDST, Wednesday, October 17, 2012, will be returned to the submitter.

For technical assistance, please call NFPA at 1-800-344-3555.

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Log #: _____

Date Rec'd: _____

Please indicate in which format you wish to receive your ROP/ROC ☒ electronic ☐ paper ☐ download
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Please indicate organization represented (if any) PV INDUSTRY FORUM

1. Section/Paragraph 690.47(D)

2. Comment on Proposal No. (from ROP): 4-315

3. Comment recommends (check one): ☐ new text ☒ revised text ☐ deleted text

4. Comment (include proposed new or revised wording, or identification of wording to be deleted): [Note: Proposed text should be in legislative format; i.e., use underscore to denote wording to be inserted (inserted wording) and strike-through to denote wording to be deleted (~~deleted wording~~).

Revise the proposed text as follows
(D) Additional Electrodes for Array Grounding.

Grounding electrodes shall be installed in accordance with 250.52 at the location of all ground- and pole-mounted photovoltaic arrays. The electrodes shall be connected directly to the array frame(s) or structure. Mounting poles or structures meeting the requirements of 250.52 shall be acceptable. The dc grounding electrode conductor shall be sized according to 250.166. Bonding this grounding electrode to other grounding electrodes in the system shall not be required. Additional electrodes are not permitted to be used as a substitute for equipment bonding or equipment grounding conductor requirements.

5. Statement of Problem and Substantiation for Comment: (Note: State the problem that would be resolved by your recommendation; give the specific reason for your Comment, including copies of tests, research papers, fire experience, etc. If more than 200 words, it may be abstracted for publication.)

The first added sentence allows the use of the mounting poles and structures to meet this requirement where they meet 250.52 requirements. Adding the second sentence shown removes any confusion in this area. The required equipment-grounding conductor connects all grounding electrodes together. An additional bonding connection between electrodes which may be hundreds or thousands of feet apart is not required or warranted, and will create parallel paths of currents in the equipment-grounding conductor. This requirement now follows practice established in 250.54 and in 250.32.

A note to CMP-4. The panel actions as published in the Draft NEC and the panel statements are not consistent and are confusing. The original proposal did not include roof top installations. The panel actions added roof top installations. The panel statement said that roof top installations were not to be included. The draft NEC follows the original proposal, not the panel actions, and does not include roof top installations.

We agree with the panel statement and the draft NEC. **Do not include roof-top installations.**

6. Copyright Assignment

- (a) ☒ I am the author of the text or other material (such as illustrations, graphs) proposed in the Comment.
- (b) ☐ Some or all of the text or other material proposed in this Comment was not authored by me. Its source is as follows:
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Signature (Required)



PLEASE USE SEPARATE FORM FOR EACH COMMENT

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10/15/2012