The videorecording of the floor discussion on this proposal was, on the whole, respectful. It was good to see the homebuilders support our proposal to permit electrical power designers to apply their judgement in building power system design as the Canadian Electrical Code has allowed them to do for decades.

The NFPA Life Safety Code has a variant -- NFPA 101A: Guide on Alternative Approaches to Life Safety -- which accommodates imaginative but safe solutions. The National Electrical Code has no such variant. The complicated prescriptive rules covering building interior wiring could be less complicated with the performance variant we propose here. Electrical codes, standards and guidelines need to evolve quickly to meet the demand posed by the artificial intelligence build out.

The user-interest is routinely outmatched by manufacturers that can afford the professional time and travel. However, now that we have our first proposal tracking in the ICC catalog we may find a like-minded expert to attend the hearings later this year to advocate this proposal; if not me.

For now, consider this: The education industry is the largest building construction market in the United States: $135 billion annually (US Census Bureau). The University of Michigan has the largest expanse of building square footage of any university in the world -- nearly 40 million square feet. In other words, we have one of the largest building safety study units on earth.

Since 1993 we have challenged the prescriptive wiring design rules in the NEC and have funded studies to prove our claim. Here are three:

> Rightsizing electrical power systems in large commercial facilities
>
> Rightsizing Commercial Electrical Power Systems: Review of a New Exception in NEC Section 220.12
>
> Evaluation of Electrical Feeder and Branch Circuit Loading: Phase 1
>
> Electric Circuit Data Collection: An Analysis of Health Care Facilities (Mazetti)

Additional information to support our comment appears in this link:

> https://standardsmichigan.com/performance-based-electrical-power-chain-design/

Our experience has been that it takes two or three code revision cycles to make a meaningful code change in any standards catalog. This is a start. We welcome collaboration with others in expanding performance based electrical safety best practice into the ICC catalog.