

October 19, 2020

**Re: SUPPORT OF CB54-2020 WITH AMENDMENT – 2020 Electrical Code Updates**

Dear Chairwoman Jung and Members of the Howard County Council:

The Howard County Chapter of the Maryland Building Industry Association (MBIA) writes in support of Council Bill 54-2020, which would adopt the 2020 Edition of the National Electrical Code as the Howard County Electrical Code, with amendments.

Code updates are necessary but complex, and we appreciate the County's diligence and attention to this process. However, we do ask that one proposed change be amendment out. The bill as drafted would allow an outdoor emergency disconnect, instead of requiring exclusive indoor installation (230.85). We are concerned with the potential safety and security issues raised by this change.

Many large electrical services supplying single-family dwellings are located in electrical service rooms within the home and will require a large disconnecting means to be installed outside. In regions where snow and inclement weather is normal during winter, locating the service main inside the building is common and will now require a main disconnecting means outside with all panelboards inside in compliance with 250.24(A)(5) with the neutral isolated from the equipment grounding system. Service changes on older homes will now require a main disconnecting means to be located outside, unless it is permitted outside with the main located inside the home.

Outdoor safety disconnects allow anyone to terminate the power to a home. Installing extra protection on outdoor disconnects to thwart unauthorized power access is possible, but will add expense. This will be especially difficult to justify to homeowners in locations where it's not common practice to add outdoor service panelboards.

Harford County recently adopted the 2020 National Electrical Code, but deleted this requirement, considering it a security issue for the home. We respectfully ask the Howard County Council to do the same.

Thank you for your attention to this issue and your continued support of the local home building industry. If you have any questions about these comments and would like to discuss MBIA's position further, please do not hesitate to contact me at [abailey@marylandbuilders.org](mailto:abailey@marylandbuilders.org) or (202) 815-4445.

Best regards,



Angelica Bailey, Esq., Vice President of Government Affairs

Cc: Councilman Opel Jones  
Councilmember Christiana Mercer Rigby  
Councilman David Yungmann

County Executive Calvin Ball  
Sameer Sidh, Chief of Staff to the County Executive  
Councilmember Elizabeth Walsh