

NOTE: The following answers are provided to the webinar questions. For project specific questions, contact the HCAI/OSHPD Regional Supervisor assigned to the project.

Q1 Are there any considerations for class 4 power being used in healthcare facilities. For example, if class 4 power were to be used for lighting system infrastructure would 700.11 apply?

A1 "It does not appear that the NEC recognizes class 4 power as permitted for the Essential Electrical System and/or in patient care areas. Article 726 Class 4 Fault-Managed Power Systems is a new code section added to the NEC/CEC in 2023 and it looks like there are still many details to work out. I cannot find any code sections that would allow class 4 power to be installed in healthcare facilities in any capacity. We are open to discuss.

Q2 Sorry if this is off topic, but I have debated this with others before. Is NFPA 99 adopted in CA and if so which code cycle?

A2 The NFPA 99 reference for Group I-2 Electrical Systems was added to the California Building Code in 2016 - CBC 407.10 Electrical System. It was removed by a California amendment during the 2019 Intervening code adoption cycle. NFPA 99 has now been added back to the Group I-2 Electrical System requirement in 2025 CBC 407.11. Please Note: During that period between 2019 Intervening code (July 1 2021) and January 1, 2026 (when we adopt the 2025 CEC) the code still required design and construction in accordance with Chapter 27 of CBC which required compliance with NFPA 99 for the Essential Electrical System. All other periods require the entire electrical system to comply with NFPA 99.

Q3 Does the new requirement for a barrier described by 215.15 apply for new panelboard installations only or will it be applied if you modify an existing panelboard (i.e. connect to spare branch circuit breaker or add new branch circuit breakers)?

A3 New switchboards/panelboards only.

Q4 In regards to the new requirements found in 110.26 which require clear working space and access to working space, can the 24" clearance be taken where the other door is closed at the opposite side of the aisle? Or do we have to take into account both doors open with the 24" clearance requirement?

A4 For installations that fall under the condition 3 (equipment on both sides of the room), you will need to take into account both doors open when confirming the 24" minimum work space access requirement. Here is the code language "Open equipment doors shall not impede access to and egress from the working space. Access or egress is impeded if one or more simultaneously opened equipment doors restrict working space access to be less than 610 mm (24 in.) wide and 2.0 m (6 1/2 ft) high."

Q5 Re: 110.26 Spaces about electrical equipment, what if the electrical panel doors swing 180 degrees?

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A5 You will need to take into account both doors open (90 degrees or what ever amount that restricts the space the most) when confirming the 24" minimum work space access requirement. Here is the code language "Open equipment doors shall not impede access to and egress from the working space. Access or egress is impeded if one or more simultaneously opened equipment doors restrict working space access to be less than 610 mm (24 in.) wide and 2.0 m (6 1/2 ft) high."

Q6 *Would the door restriction be omitted if the door swings 180 degrees?*

A6 You will need to take into account both doors open (90 degrees or what ever amount that restricts the space the most) when confirming the 24" minimum work space access requirement. Here is the code language "Open equipment doors shall not impede access to and egress from the working space. Access or egress is impeded if one or more simultaneously opened equipment doors restrict working space access to be less than 610 mm (24 in.) wide and 2.0 m (6 1/2 ft) high."

Q7 *If an ATS manufacturer recommends replacing their existing controller due to being obsolete, can I change the controller in next years code? I'm worried i trigger the reconditioned 700.2*

A7 It would not be in conflict with the 2025 CEC section 700.2 to retrofit the ATS with a new controller. Please note there is a difference between retrofitting equipment which upgrades to modern components, and is permissible if performed by the manufacturer of the ATS and the ATS is UL re-certified (which is code compliant) and reconditioning which involves repairing and refurbishing to bring back to the original functional state (which is not permitted by code for ATSS per 2022 CEC 700.5(C) and 2025 CEC 700.2.

Q8 *On generator fuel tank sizing, the new 2025 NFPA 110 now only requires sizing to 100% - so now only 72 hours of on-site fuel storage is required to comply for OSHPD1 facilities?*

A8 Yes, that is correct.

Q9 *What if doors open more than 90 degrees? Does that impact spacing?*

A9 You will need to take into account all doors open (90 degrees or what ever amount that restricts the space the most) for the 24" min clearance requirement. Here is the code language "Open equipment doors shall not impede access to and egress from the working space. Access or egress is impeded if one or more simultaneously opened equipment doors restrict working space access to be less than 610 mm (24 in.) wide and 2.0 m (6 1/2 ft) high."

Q10 *How will 110.26 Spaces about electrical equipment be enforced in existing electrical room conditions (many of which have less space than would be required), specifically on panel replacement projects?*

A10 If you add circuits to an existing panelboard you will not need to address new code requirements for working space, and access to and egress from working space. If

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you install a new panel or replace an old panel with new you will need to meet the new code requirements.

Q11 If equipment doors open more than 90 degrees Does that impact spacing?

A11 You will need to take into account all doors open (90 degrees or what ever amount that restricts the space the most) for the 24" min clearance requirement. Here is the code language "Open equipment doors shall not impede access to and egress from the working space. Access or egress is impeded if one or more simultaneously opened equipment doors restrict working space access to be less than 610 mm (24 in.) wide and 2.0 m (6½ ft) high."

Q12 How will GFCIs be impacted WRT garbage disposals?

A12 Below sink garbage disposals will need GFCI protection. Here is the code section 210.8 (B) (7) Sinks where receptacles or cord-and-plug-connected fixed or stationary appliances are installed within 1.8 m (6 ft) from within 1.8 m (6 ft) from the top inside edge of the bowl of the sink.

Q13 Is the Title 24, Part 6, California Energy Code adopted by OSHPD?

A13 Yes, the 2025 California Energy Code will be enforced for all projects submitted Jan 1 ,2020 and later (see OSHPD CAN 1-0)

Q14 408.9 Replacement Panelboards - wouldn't replacement of the panelboard 'guts' be preempted by OSP/Seismic Certification requirements for most HCAI occupancies?

A14 The replacement panelboard "guts" will need to be compatible with the existing panelboard enclosure, i.e. either UL listed or field listed for compatibility. The replacement panelboard (guts) would need SSC (via an OSP) but the existing panelboard enclosure would not need SSC (or OSP).

Q15 Nurse Call updates?

A15 "The following language with strike out included shows the changes to the Nurse Call Updates made to the code this cycle. (we removed the last 15 words from 517.123(C)(3). This was the only change. 517.123 [OSHPD 1, 2, 3, 4 & 5] Call Systems (C) Bath Stations. Bath stations shall meet the following requirements:

(1) Shall be accessible to a patient lying on the floor. Pull cords shall be provided that extend to within 12 inches (304.8 mm) of the floor.

(2) The call may be reset only at the location where it was initiated.

(3) In shower stalls and tubs, the station shall be located between 5 and 6 feet (1524 to 1829 mm) above the floor, within normal view of the user and within reach of staff without the need to step into the stall or tub."