

**INITIAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE DEPARTMENT OF HEALTH CARE ACCESS AND INFORMATION/  
OFFICE OF STATEWIDE HOSPITAL PLANNING AND DEVELOPMENT  
REGARDING THE 2025 CALIFORNIA ELECTRICAL CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 3  
(OSHDP 04/25)**

The Administrative Procedure Act (APA) requires that an Initial Statement of Reasons be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

**STATEMENT OF SPECIFIC PURPOSE, PROBLEM, RATIONALE and BENEFITS**

Government Code Section 11346.2(b)(1) requires a statement of specific purpose of each adoption, amendment, or repeal and the problem the agency intends to address and the rationale for the determination by the agency that each adoption, amendment, or repeal is reasonably necessary to carry out the purpose and address the problem for which it is proposed. The statement shall enumerate the benefits anticipated from the regulatory action, including the benefits or goals provided in the authorizing statute.

**ITEM 1**

**Chapter 5 Special Occupancies**

**ARTICLE 517 Health Care Facilities**

**517.31 Requirements for the Essential Electrical System.**

HCAI proposes to add an exception to this California amendment to not require bypass Isolation Automatic Transfer Switches for fire pumps, which aligns with the National Electrical Code (NEC).

The larger Automatic Transfer Switches (ATS) listed for fire pump service are not available with the Bypass Isolation feature. This change will update the California Electrical Code to eliminate the conflict of requiring electrical equipment that is not available and will revert back to the requirements found in the NEC. This allows the use of ATS for fire pumps that are listed for fire pump service but are not required to be bypass isolation type. This amendment is necessary to conform to model code and does not materially alter the intent of existing code provisions or impact the cost of compliance.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 2**

**Chapter 5 Special Occupancies**

**ARTICLE 517 Health Care Facilities**

**517.34 Critical Branch.**

HCAI proposes to revise the California amendment in item #11 that lists items that are required to be connected to the critical branch. Item 11 b Sensor-operated fixtures is revised to read "*where an internal battery is not provided*" in lieu of "where direct wired."

Clarification is needed regarding the proper branch circuit for sensor-operated fixtures with both battery back-up and plug-in functionality. The code is clear that if direct wired it needs to be circuited to the critical branch, and if battery backed up it would not need to be provided with power. However, manufacturers have developed an option that is a combination battery back-up and plug-in sensor device, and HCAI has had different interpretations as to what branch the receptacle that supports the unit needs to be fed by. HCAI reviewed the California Plumbing Code (CPC), which states that “Sensor operated fixtures shall be capable of functioning during loss of normal power.” Based on this CPC requirement, HCAI proposes to revise the wording for this amendment to match the requirements that are found in the CPC, which would not require a critical branch circuit to feed a sensor if provided with battery backup. This amendment is necessary to conform to model code and does not materially alter the intent of existing code provisions or impact the cost of compliance.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 3**

**Chapter 5 Special Occupancies**

**ARTICLE 517 Health Care Facilities**

**517.35 Equipment Branch Connection to Alternate Power Source.**

HCAI proposes to repeal existing model code language CEC 517.35(B)(5). CEC 517.35(B)(5) requires automatically operated doors to be powered by the equipment branch of the essential electrical system. Prior to the 2004 code cycle, CEC required automatically powered doors to be powered by the equipment branch of the essential electrical system. The term “automatically powered door” used in this requirement meant a swinging, sliding or folding door that opens automatically when approached by a pedestrian using motion sensors or floor mat actuators to detect the pedestrian. In the 2004 CEC, model code added language requiring automatic doors used for building egress to be powered by the life safety branch of the essential electrical system. This requirement is still in the code as CEC 517.33(H). The life safety power requirement for automatic doors was added to the CEC to align with revisions made to the 1999 NFPA 99. 1999 NFPA 99 relocated the automatic door power requirement from equipment branch to the life safety branch and clarified it was only for doors in the path of building egress. Unlike the equipment branch, the life safety branch is required to automatically restore power within 10 seconds after an interruption of the normal power source. The NFPA 99 code committee justification for the code proposal was to address the belief that the general public is not usually familiar with the manual operation of automatic doors under emergency conditions, so a minimal interruption of normal door function is required for the safety of the general public.

Leaving equipment branch power requirement in the CEC has led to confusion and over-enforcement in implementing power connections to automatic doors used in hospitals since there are two conflicting automatic door power requirements. Furthermore, CEC 517.35(B)(5) can be incorrectly interpreted to mandate that any door with electrically powered opener shall be connected to the essential electrical system even when the

California Building Code (CBC) does not require the power-operated door or power-assisted door to be connected to a backed-up power source. Repealing CEC 517.35(B)(5) will eliminate the conflicting automatic door power requirements found in CEC Article 517 and allow design professionals to select the appropriate power source for the application while still complying with the code. This amendment is necessary to remove conflict in the code and conform to model code. The repeal does not materially alter the intent of existing code provisions or impact the cost of compliance.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 4**

**Chapter 5 Special Occupancies**

**ARTICLE 517 Health Care Facilities**

**517.44 Connection to Equipment Branch. (A)(6), (7), (8), (9), and (10)**

HCAI proposes revising OSHPD banners to read [OSHPD 2, 4 & 5] to be consistent with the application of this code section. This section applies to Type 2 essential electrical systems that do not house Category 1 critical care patients. Type 1 essential electrical systems are required for facilities with Category 1 critical care patients and requirements for circuiting in these facilities can be found in Sections 517.34 and 517.35.

These proposed code revisions are related to OSHPD banners only and are intended to clean up the OSHPD building types by fixing incorrect banner numbers. Note: 517.44 uses the correct banner of [OSHPD 2, 4 & 5] and the identified items will need the same banner or a banner with a subset of these OSHPD types.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**517.44 Connection to Equipment Branch. (A)(9)**

HCAI proposes to revise the California amendment for sensor-operated fixtures in Skilled Nursing Facilities (SNF) to read "where an internal battery is not provided" in lieu of "where direct wired."

Clarification is needed regarding the proper branch circuit for sensor-operated fixtures with both battery back-up and plug-in functionality. The code is clear that if direct wired, it needs to be circuited to the critical branch, and if battery backed up, it would not need to be provided with power. However manufacturers have developed an option that is a combination battery back-up and plug-in sensor device, and HCAI has had different interpretations as to what branch the receptacle that supports the unit needs to be fed by. HCAI reviewed the California Plumbing Code (CPC), which states that "Sensor operated fixtures shall be capable of functioning during loss of normal power."

Based on this CPC requirement HCAI proposes to revise the wording for this CA

amendment to match the requirements that are found in the CPC, which would not require a critical branch circuit to feed a sensor if provided with battery backup. This amendment is necessary to conform to model code and does not materially alter the intent of existing code provisions or impact the cost of compliance.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**517.44 (A)(11), (12) and (13)** This proposed change clarifies that specific equipment that is listed is required to be connected to the equipment branch for SNFs. HCAI proposes to add items *(11) Alarm systems for monitoring negative pressure isolation rooms and positive pressure isolation rooms, (12) Medication dispensing units and (13) Medication refrigerators and freezers to the list of equipment required to be connected to the equipment branch of SNF facilities.*

The code as written requires supply, return, and exhaust ventilating systems for airborne infectious isolation rooms to be circuited to the equipment branch [see Section 517.44(A)(2)]. While it is inferred, it is not specifically stated that the alarm systems also need to be connected to the equipment branch to ensure proper operation, so HCAI proposes to add this as a line item [see Section 517.44(A)(11)].

HCAI also proposes to clarify requirements for medication dispensing units and medication refrigerators and freezers to be connected to the equipment branch by adding Items [see Sections 517.44(A)(12) and (13)]. HCAI interpreted the requirement for medication preparation spaces in 517.4(A)(1)(a) and pharmacy dispensing spaces in 517.4(A)(1)(b) to include these units, and to therefore already require them to be circuited to the equipment branch. HCAI proposes adding these items here to make it clear that these items are required to be connected to the equipment branch to match the methodology developed in 517.35.

These amendments are for clarification and to conform with existing code and do not materially alter the intent of existing code provisions or impact the cost of compliance.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 5**

**Chapter 5 Special Occupancies**

**ARTICLE 517 Health Care Facilities**

**517.124 Connection to Equipment Branch.**

HCAI proposes to add OSHPD 2 designation to the requirements in CEC 517.124 to align with the proposed amendment in CBC Part 2, Volume 1, Section 1225.5.1.1. Note: CBC 1225.5.1.1 previously required SNFs to comply with CBC 1224.4 through 1224.13 [OSHPD 1] requirements for telecom found in Section 1224.5. The revised language in

CBC 1225.5.1.1 provides specific telecom requirements for skilled nursing facilities [OSHPD 2] which align with the Facility Guidelines Institute (FGI), Guidelines for Design and Construction of Hospitals requirements from those requirements found in CBC 1224.5.1 [OSHPD 1]. This amendment is necessary for clarification and does not materially alter the intent of existing code provisions or impact the cost of compliance.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 6**

**Chapter 6 Special Equipment**

**ARTICLE 695 Fire Pumps**

**695.3 Power Source(s) for Electric Motor-Driven Fire Pumps.**

HCAI proposes to modify the OSHPD banner for this section to remove the requirements for alternate power source(s) for fire pumps at OSHPD 1R facilities and to limit the alternate power source requirements for fire pumps at OSHPD 3 facilities to just OSHPD 3 facilities that have surgical clinics only. This is a legacy California requirement that imposes undue burden on OSHPD 1R and OSHPD 3 facilities (that do not have category 1 patients) to have an alternate on-site power source in addition to a direct connection to the utility service for Fire pumps. (Note: OSHPD 1R and 3 facilities (that do not have category 1 patients) would typically not be required to have on-site power sources to back up their emergency systems appropriate to back up fire pumps.

HCAI also proposes revising the onsite alternate power source requirements to allow sources other than generators. This approach is consistent and conforms with the Essential Electrical System requirements for these facilities and matches recent changes to the language revisions that can be found elsewhere in the code.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**695.3 (G)** HCAI proposes to modify this amendment by removing the requirement to comply with 517.31(B)(3) for fire pump automatic transfer switches (ATS). Note: 517.31(B)(3) requires Isolation Bypass ATS for all ATS which in this case includes Fire Pump ATS. The proposed change will remove this requirement from the existing California amendment so the ATS requirements (bypass isolation type not required for fire pumps) will match those found in the NEC.

It has been brought to our attention that the larger Automatic Transfer Switches listed for fire pump service are not available with the Bypass Isolation feature. This change will update the code to eliminate the conflict of requiring electrical equipment that is not available and will revert back to the requirements found in the NEC which allows the use of ATS for fire pumps that are listed for fire pump service but are not required to be bypass

isolation type. HCAI coordinated this change with the Office of the State Fire Marshal. This amendment is necessary to conform to model code and does not materially alter the intent of existing code provisions or impact the cost of compliance.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS**

Government Code Section 11346.2(b)(1) requires a statement of the reasons why an agency believes any mandates for specific technologies or equipment or prescriptive standards are required.

The proposed changes do not mandate any specific technologies or equipment and do not require any prescriptive standards.

**ASSESSMENT OF EFFECT OF REGULATIONS UPON JOBS AND BUSINESS EXPANSION, ELIMINATION OR CREATION**

Government Code Sections 11346.2(b)(2) and 11346.3(b)(1)

HCAI has assessed whether and to what extent this proposal will affect the following:

**A. The creation or elimination of jobs within the State of California.**

The proposed regulations will not create or eliminate jobs within the State of California.

**B. The creation of new businesses or the elimination of existing businesses within the State of California.**

The proposed regulations will not create new businesses or eliminate existing businesses with the State of California.

**C. The expansion of businesses currently doing business within the State of California.**

The proposed regulations will not cause expansion of businesses currently doing business with the State of California.

**D. The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment.**

The proposed building standards and regulations regarding the design and construction of licensed health facilities ensure protection of the public's health, safety, and welfare of California residents through updated amendments. The regulations will not affect worker safety, or the state's environment.

**TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS**

Government Code Section 11346.2(b)(3) requires an identification of each technical, theoretical, and empirical study, report, or similar document, if any, upon which the agency relies in proposing the regulation(s).

There are no formal studies, reports, or documents to be identified as the basis for the proposed amendments in Items 1, 2, 4, 5, and 6. For Item 3, substantiation from Item 99-57 code change proposal (page 151) in The National Fire Protection Organization (NFPA) report title F1998 Report on Proposals (ROP) were used in the rationale for this code modification. [ROPF1998-99-99B.pdf](#)

## **CONSIDERATION OF REASONABLE ALTERNATIVES**

Government Code Section 11346.2(b)(4)(A) requires a description of reasonable alternatives to the regulation and the agency's reasons for rejecting those alternatives. In the case of a regulation that would mandate the use of specific technologies or equipment or prescribe specific action or procedures, the imposition of performance standards shall be considered as an alternate. It is not the intent of this paragraph to require the agency to artificially construct alternatives or describe unreasonable alternatives.

There were no alternatives for consideration by HCAI. The proposed amendments will provide clarification and consistency within the code and are in alignment with national standards.

## **REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS**

Government Code Section 11346.2(b)(4)(B) requires a description of any reasonable alternatives that have been identified or that have otherwise been identified and brought to the attention of the agency that would lessen any adverse impact on small business.

All items have no adverse impact on small business. Alternatives were not explored.

## **FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE ECONOMIC IMPACT ON BUSINESS**

Government Code Section 11346.2(b)(5)(A) requires the facts, evidence, documents, testimony, or other evidence on which the agency relies to support an initial determination that the action will not have a significant adverse economic impact on business.

HCAI has identified that there will be no adverse economic impact on businesses on the basis that the proposed provisions contain clarifying changes and align with national standards or other California regulations.

## **ESTIMATED COST OF COMPLIANCE, ESTIMATED POTENTIAL BENEFITS, AND RELATED ASSUMPTIONS USED FOR BUILDING STANDARDS**

Government Code Section 11346.2(b)(5)(B)(i) states if a proposed regulation is a building standard, the initial statement of reasons shall include the estimated cost of compliance, the estimated potential benefits, and the related assumptions used to determine the estimates.

HCAI finds that the proposed building standards will result in no cost.

## **DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS**

Government Code Section 11346.2(b)(6) requires a department, board, or commission within the Environmental Protection Agency, the Resources Agency, or the Office of the State Fire Marshal to describe its efforts, in connection with a proposed rulemaking action,

to avoid unnecessary duplication or conflicts with federal regulations contained in the Code of Federal Regulations addressing the same issues. These agencies may adopt regulations different from these federal regulations upon a finding of one or more of the following justifications: (A) The differing state regulations are authorized by law and/or (B) The cost of differing state regulations is justified by the benefit to human health, public safety, public welfare, or the environment.

The proposed regulations do not duplicate or conflict with Federal regulations.