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September 16, 2020

LARA

Bureau of Construction Codes

Via Email: LARA-BCC-Rules@michigan.gov

Re: Part 5. Residential Code (ORR# 2019-118 LR)

To Whom it May Concern;

The Michigan Air Conditioning Contractors Association (MIACCA), would like to submit the following public comments in regards to Part 5. Residential Code (ORR# 2019-118 LR) :

MIACCA requests that the Bureau to remove, in its entirety, the Section R105.2(c)(xi) exemption which states (xi) When changing or relocating a gas meter or regulator, a permit is not required when installing gas piping which shall be limited to 10 feet (3 005 mm) in length and not more than 6 fittings.

MIACCA requests that as an alternative to removing Section R105.2(c)(xi) entirely, that the Bureau considers replacing Section R105.2(c)(xi) with the proposed following language:

(xi) When changing or relocating a gas meter or regulator, a permit is not required when installing gas piping OUTDOORS which shall be limited to 10 feet (3.005 mm) in length and not more than 6 fittings.

Therefore, MIACCA respectfully requests that Section R105.2(c)(xi) be either removed in its entirety and alternatively replaced with the proposed language, suggested in the above paragraph,

and requiring mechanical permits, gas leak testing and mechanical inspections by the third party authority having jurisdiction when gas meters are relocated in residences that includes gas piping after the meter being redone and or installed. If mechanical permits are required for other gas piping done in a residence, then so should the gas piping done when relocating a gas meter.

We appreciate the opportunity to comment on this and hope that you will strongly consider our suggestions, as we believe it is to the benefit of the profession and our members. Please contact me with any questions you might have.

Best Regards,

A handwritten signature in black ink, appearing to read 'M.J. D'Smith', written in a cursive style.

M.J. D'Smith
Executive Director