

OPPOSITION To House Bill 222

On behalf of Ward Manufacturing, the manufacturer of WardflexMAX corrugated stainless steel tubing (CSST), **we respectfully request an unfavorable report to HB 222.** As introduced, HB 222 proposes to mandate one manufacturer's proprietary product listing criteria (ICC ES PMG LC1027) in place of the national consensus standard (CSA ANSI LC 1:2023) for CSST.

The LC 1 standard dictates strict testing and performance requirements for arc-resistant CSST jackets that prove it will provide a high degree of resistance to electrical arcing caused by lightning. This is why the National Fuel Gas Code and the International Fuel Gas Code only recognize the use of CSST in accordance with the LC 1 standard. All brands of arc-resistant CSST made under the enhanced LC 1 requirements can meet the expected levels of electrical energy that actually occur within the piping system of a structure. **The millions of feet of arc-resistant CSST that have been installed in the US since 2007 have an exceptional safety record.**

If passed, HB 222 circumvents national consensus standards that are developed by the American National Standards Institute and similar organizations. Similar attempts to the one being made in House Bill 222 have been made in Oklahoma, Iowa, and Texas and they have all been rejected. Proposals to recognize LC 1027 in lieu of LC 1 have also been rejected by the International Fuel Gas Code and the International Residential Code.

PMG LC 1027 is not an accepted national consensus standard that was developed as part of a rigorous standards development process as defined by ANSI. It is a proprietary ICC listing criteria specifically developed for a single CSST manufacturer's patented design. The intention of listing criteria is to allow for evaluation of emerging products until they can be covered by an existing national standard or a new one is created.

Imposing the terms of HB 222 within the state of Maryland creates a number of issues. To our knowledge, all but one patented CSST product will be eliminated; thus, if passed HB 222 sets up an industry in Maryland for one manufacturer. Reliance on one manufacturer and its proprietary product will likely have an impact on supply and price for Maryland consumers. We proffer that the concerns from the proponents have already been mitigated with passage of House Bill 1052 (2022) that required only arc-resistant CSST in accordance with CSA ANSI LC 1 to be available for installation.

In conclusion, piping systems installed in Maryland should be specified by existing national consensus standards.

Respectfully submitted,

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