

Review of Block 3 Items Category 3 Method of Sealing Paragraphs

General Comments:

- Except the EVFS and Tentative NUEMS codes, all the methods of sealing codes in the Handbook state that the Event logger information “must be” or “shall be:”
 “Available **at time of inspection**” or “**on demand** through the device or through another onsite device”
- OWM supports retaining the intent of this language as it requires that the information be available for the inspector to review during an inspection or for reference at a later time.
- The EVFS Code states “The event Logger information **may be** provided electronically in lieu of or in addition to a hard copy at the time of inspection”. OWM is concerned that this could be interpreted as not requiring the event logger information to be provided “at the time of inspection” or “on demand”, just allowing it as an option. If optional, how will an inspector verify category 3 sealing?
- The Tentative NUEMS Code states “A printed copy of the information must be available through the device or another device. There is currently no mention of electronic event logger information. And no mention of the information being available “**at time of inspection**” or “**on demand**”. (I believe electronic event information should be added and that it “**shall be**” or “**must be**” available “**at time of inspection**” or “**on demand**”.
- The effect of modifying the sealing requirements with regard to nonretroactive and retroactive requirements must be considered. Section 5.5.6.(a) paragraphs S.2.5. and S.2.5.1. and Table S.2.5. should be referenced as guidance to incorporate new sealing requirements.

NIST HB 44 Code	Current Requirements for Category 3 Method of Sealing	Measuring Sector Proposal for Method of Sealing for Category 3 (submitted Sept. 2025)	NIST OWM Proposal to add the same requirement to all Measuring Codes with a Method of Sealing for Category 3 Device
3.30 LMD Table S.2.2,	<p><i>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. The event logger information shall be available at the time of inspection either as a printed copy or in electronic format. The information may be printed by the device, printed by another on-site device, or transmitted electronically. The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)</i></p>	<p>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. The event logger information shallmay be available at the time of inspection either as a printed copy or in electronic format. <u>provided electronically in lieu of or in addition to a hard copy at the time of inspection, provided the event logger information is retained in the system for future reference.</u> The information may be printed by the device, printed by another on-site device, or transmitted electronically. The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)</p>	<p><i>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. The event logger information shall be available at the time of inspection either as a printed copy or <u>transmitted in an</u> electronic format. The information may be printed by the device, printed by another on-site device, or transmitted electronically. The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)</i></p>

NIST HB 44 Code	Current Requirements for Category 3 Method of Sealing	Measuring Sector Proposal for Method of Sealing for Category 3 (submitted Sept. 2025)	NIST OWM Proposal to add the same requirement to all Measuring Codes with a Method of Sealing for Category 3 Device
3.31 VTM Table S.2.2.			
3.32 LPG & AALM Table S.2.2.	<i>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. A printed copy of the information must be available on demand through the device or through another on-site device. The information may also be available electronically. The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1 000 records are required. (Note: Does not require 1 000 changes to be stored for each parameter.)</i>		
3.34 CLM Table S.2.5.		An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter.	<i>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. <u>The event logger information shall be available at the time of inspection either as a printed copy of the information must be available on demand through the device or through another on-site device. The information may also be available</u></i>
3.35 MLK Table S.2.3.		A printed copy of the information must be available on demand through the device or through another on-site device. The information may also be available electronically.	<i><u>transmitted in an electronically format.</u> The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1 000 records are required. (Note: Does not require 1 000 changes to be stored for each parameter.)</i>
3.36 WTR Table S.2.1.		The event logger information may be provided electronically in lieu of or in addition to a hard copy at the time of inspection, provided the event logger information is retained in the system for future reference.	
3.37 MFM Table S.3.5.		The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)	
3.38 CDL Table S.2.5.,			
3.39 HGM Table S.3.3,	An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. A printed copy of the information must be available on demand through the device or through another on-site device. The information may also be available electronically. The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)		An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. <u>The event logger information shall be available at the time of inspection either as a printed copy of the information must be available on demand through the device or through another on-site device. The information may also be available</u> <u>transmitted in an electronically format.</u> The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1 000 records are required. (Note: Does not require 1 000 changes to be stored for each parameter.)

NIST HB 44 Code	Current Requirements for Category 3 Method of Sealing	Measuring Sector Proposal for Method of Sealing for Category 3 (submitted Sept. 2025)	NIST OWM Proposal to add the same requirement to all Measuring Codes with a Method of Sealing for Category 3 Device
3.40 EVF Table S.3.3.	<p>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. The event logger information may be provided electronically in lieu of or in addition to a hard copy at the time of inspection, provided the event logger information is retained in the system for future reference. The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the EVSE, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)</p>	<p>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. The event logger information may be provided electronically in lieu of or in addition to a hard copy at the time of inspection, provided the event logger information is retained in the system for future reference. The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the EVSE device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)</p>	<p>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. <u>The event logger information shall be available at the time of inspection either as a printed copy of the information or through another on-site device. The information may also be available transmitted in an electronically format.</u> The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the EVSE device, but not more than 1 000 records are required. (Note: Does not require 1 000 changes to be stored for each parameter.)</p>
3.41 EMS Table S.2.2.	<p>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. <u>A printed copy of the information must be available through the device or through another on-site device.</u> The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)</p>	<p>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. A printed copy of the information must be available on demand through the device or through another on-site device. The information may also be available electronically. <u>The event logger information may be provided electronically in lieu of or in addition to a hard copy at the time of inspection, provided the event logger information is retained in the system for future reference.</u> The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)</p> <p>*Currently, the sealing requirements in this section do not allow for an electronic version of the audit trail information. It requires that they be provided as a printed copy. The proposed language in the new Block 3 doesn't identify the correct language to be removed.</p>	<p>An event logger is required in the device; it must include an event counter (000 to 999), the parameter ID, the date and time of the change, and the new value of the parameter. <u>The event logger information shall be available at the time of inspection either as a printed copy of the information or through another on-site device transmitted in an electronic format.</u> The event logger shall have a capacity to retain records equal to 10 times the number of sealable parameters in the device, but not more than 1000 records are required. (Note: Does not require 1000 changes to be stored for each parameter.)</p>