Distribution Code Consultation Response Proforma

DCRP/21/04/PC: Engineering Recommendation (EREC) G12 Issue 4 Amendment 2

Requirements for the Application of Protective Multiple Earthing to Low Voltage Networks

Stakeholders are invited to respond to this consultation, expressing their views or providing any further evidence on any of the matters contained within the consultation document. Stakeholders are invited to supply the rationale for their responses to the set questions.

Please send your responses and comments by **17:00 on 7 May 2021** to dcode@energynetworks.org and please title your email:

'**Consultation Response DCRP/21/04/PC EREC G12 Issue 4 Amendment 2**'.

Please note that any responses received after the deadline may not receive due consideration by the Working Group.

Any queries on the content of the consultation pro-forma should be addressed to DCode Administrator on 020 7706 5100, or to dcode@energynetworks.org

Respondent	*Peter Lagesse*
Company Name	CityEV Limited.
No. of DCode Stakeholders Represented	
Stakeholders represented	*Clients & Customer generally, seeking to implement EVSE installations*
Role of Respondent	*Manufacturer*
We intend to publish the consultation responses on the DCode website. Do you agree to this response being published on the DCode website? [Y/N]	Y

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	Question	Response
Q1	Do you agree that the proposed amendments to EREC G12 Issue 4 achieve the Distribution Code Objectives?	Yes with comments:-
Q2	Do you agree with the proposed text contained in EREC G12 Issue 4, or do you have any alternatives to propose?	Yes with comments:-

Please provide comments relating to the specific technical content of the EREC[1]

Page / line No	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE SECRETARIAT on each comment submitted
	6.2.15		G	Additional types of street equipment should be addressed in accommodating (with or without integrated EVSEs); BS7671 already accommodates PEN fault detection for all commercial and domestic installations; with street EVSE additionally accommodated there should be no reason to not to bring in street furniture generally, leaving this class out would be anomaly	Facilitate PEN fault detection OR TT at the discretion of the competent system designer for appropriate street equipment generally	

[1] Add more rows if required.

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	6.2.16		G	Responsible and competent System designers' installations should be free to choose between PEN fault detection devices (generally) and TT; the document as proposed accommodates this, however, has an undue bias toward TT as 'preferred'; Competent designers should be free to select a methodology without any implied bias on a case by case basis according to the overall design criteria. The stated text refers to 'alternative' in respect of PEN fault detection and the text should be amended to remove preference in favour of competent discretion.	Facilitate PEN fault detection OR TT equally at the discretion of the competent system designer without implied (or explicit) bias.	
	6.2.16		G	The technical content of the document should not detract from the wider social, environmental and policy objectives in respect of EV implementation and allow maximum competent flexibility, with due regard to standards.	Facilitate PEN fault detection OR TT equally at the discretion of the competent system designer without implied (or explicit) bias.	
	6.2.16		G	It is considered that the text could be simplified, whilst meeting the objectives; there is little need delve into technical standards as there are addressed in BS7671 and IET docs; this version of G12 should equally encompass TT and PEN fault detection in principle, with the mentioned conditions but without the need to refer to technical content which is covered elsewhere.	Cite the considerations and standards covered in BS7671 and the IET COP rev.4 for technical detail and confine this doc to facilitating TT or PEN failure detection.	

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