

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	<i>Dean Wendelborn</i>
Company Name	On behalf of Westminster City Council
No. of DCode Stakeholders Represented	n/a
Stakeholders represented	<i>Westminster City Council</i>
Role of Respondent	<i>Local Authority</i>
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
Q2	Do you agree with the proposed text contained in EREC G12 Issue 4, or do you have any alternatives to propose?	<p>Yes, however the wording is too detailed and could be made simpler to understand.</p> <p>We are positive on the use of retaining a PME supply on our unmetered highway street lighting as the requirement for TT with RCD and earth mat has caused more than a hundred faults to the lights, an earth mat being cut through by a third party, and a column going live due to RCD tails being damaged, none of which would have happened with retaining the PME supply with good earth loop impedance reading.</p> <p>The TT /RCD/earth mat has not been a reasonably practicable solution in the councils view</p>

Please provide comments relating to the specific technical content of the EREC¹

¹ Add more rows if required.

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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
19	6.1	1-3	general	<p>Para 1 notes TT supply is still a suitable form of fault protection, but this is then noted as not reasonably practicable in para 1 of section 6.2.16.2 based on the example noted</p> <p>The council have had numerous faults to the lights, we assume as part of the RCD installation and possible harmonics, and safety issues at two sites due to a TT supply being installed, under a risk based approach of well managed highway infrastructure you not the risk is low for someone to become the earth</p> <p>The decision should be that of the client and their designer to adhere to BS7671 to choose the reasonably practicable method of earth</p>	That reference to the use of a TT supply is removed or made clear that the designer is able to choose the reasonably practicable method of earthing for the location	
31	6.2.15	4	General	Shouldn't we have consistency of any piece of earthed metalwork on the highway, hence should not a PME with additional form of protection be allowed, what is the difference between this and an EV in 6.2.16?	Give option of PME with additional form of protection	
31/32	6.2.16	2&3	General	Para2 notes PME may be provided based on requirements, then para 3 advises an additional protection is needed, its not clear if this is either or must	Either or must is made clear, i.e. That para 2 also notes an alternative form of protection to the PME is required, or para2&3 are combined to 1 paragraph.	

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32	6.2.16.1	1,2,3	general	<p>The councils view is that a TT system is not a suitable alternative earthing arrangement when surrounded by PME connections. And this section should not be included</p> <p>Under a risk based approach in Well managed highway infrastructure, what risks have been weighed up between the TT supply and the issues it has resulted in, compared to maintaining a PME supply with good ELI to BS7671 and the historic low instances of a live earth touch potential being found (as noted in para 1 of 6.2.16.2). Are their records of the number of times this has occurred?</p>	This section removed	
32	6.2.16.1	1	general	How can a highway authority always know the associated vehicle is of class II construction?		