

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>Tom Chevalier</i>
Company Name	Power Data Associates Ltd
No. of DCode Stakeholders Represented	n/a
Stakeholders represented	<i>n/a</i>
Role of Respondent	<i>Interested Party</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

Distribution Code Consultation Response Proforma

	Question	Response
Q1	Do you agree that the proposed amendments to EREC G12 Issue 4 achieve the Distribution Code Objectives?	No
Q2	Do you agree with the proposed text contained in EREC G12 Issue 4, or do you have any alternatives to propose?	<p>Comments provided below.</p> <p>In summary, G12 should set up the circumstances when a PME earth terminal cannot be provided. It should not seek to mandate how a consumer's installation is design, installed or maintained, as this is the responsibility of the electricity consumer.</p>

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

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
18	5.2.1		T	Metallic gas services - In discussion with Gas Network Operators they have been reluctant to install and/or replace these when they are absent. This discrepancy requires resolution between the gas and electricity network operators		
18	5.4		T	The PME labels are frequently missing and not replaced during visits by DNO staff.		

¹ Add more rows if required.

Distribution Code Consultation Response Proforma

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19	6.1 or 6.2		G	<p>The ESQCR defines in Reg 24 (4) that a PME should be provided in the circumstances stated. This should be referred to in this section as it creates the framework for not providing a PME connection due where it is 'inappropriate for reasons of safety'.</p> <p>The removal of an existing PME connection can only be enforced through Reg 26.</p>		
19	6.1 or 6.2		G	<p>The scope of G12 needs to be clear that it only covers the provision of a PME connection made available to customer for connection to the customers installation. The customer is and should always be responsible for the design, operation and maintenance of <i>their</i> installation. In many ways G12 section 6 goes into too much detail in describing the customers installation which are actually decisions for the customer in their design. Examples include 6.2.11 which is effectively guidance around outside metallic taps where the pipework may be bonded the PME connection. But makes no mention of external metallic light fittings, metallic electric gates, etc. These are and should be left to the designer of the electrical installation to determine.</p> <p>Much of the text in Section 6 should be removed or transferred to a separate non-mandatory 'best practice' document.</p>		

Distribution Code Consultation Response Proforma

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27	6.2.13		G	<p>Does the following document still exist? The DTI disappeared many years ago. DTI Publication “Photovoltaics in Buildings – Guide to the installation of PV Systems”</p> <p>As comment above this Note should be removed and allow the customer installation designer to design the system to current requirements</p>		
27	6.2.14 * 6.2.15		T	<p>The ESQCR applies to all distribution ‘networks’ up to the connection to the consumers installation’. Therefore, the connection of a ‘network’ to a feeder pillar or a single street light is a ‘network’ up to the cut-out. After the distributors cut-out the installation forms part of the customers installation which is subject to BS7671.</p> <p>As a result, G12 should not seek to determine how a customer’s installation should be designed, installed and maintained as this is within the scope of BS7671 and not the Distribution Networks.</p>		

Distribution Code Consultation Response Proforma

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31	6.2.16		T	<p>The ESQCR applies to all distribution 'networks' up to the connection to the consumers installation'. After the distributors cut-out the installation forms part of the customers installation which is subject to BS7671. This is acknowledged in the second para of 6.2.16.</p> <p>The third para then uses ill-defined terminology to seek to distinguish between risk which may or may not be sufficient to classify as a special situation. G12 should not seek to determine how a customer's installation should be designed, installed and maintained as this is within the scope of BS7671. It is the role of the customer installation designer to determine a safe design taking account of the risk as part of their obligations under the Health and Safety at Work Regs to minimise the risk to the public from their installation.</p>		
31	6.2.16		T	<p>The clause refers to 'street electrical fixture' which is defined as a "on or associated with a highway". As a private street, public or private car park, motorway service area, etc. are not normally a highway this leads to a different set of obligations in G12 as to whether the installation is on a highway or a otherwise part of the customer premises. What is the rational for G12 making this distinction, is that not something that a customer installation designer should be considering?</p>		

Distribution Code Consultation Response Proforma

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32	6.2.16.2		G	The cross reference to BS7671 section 722 has the potential to lead to future inconsistencies. It would be better to remove most of the text and future proof the text by referring "...to designed and installed in accordance with relevant sections of BS7671."		
32	6.2.16.2		G	"At the time of writing no definitive standards were in existence..." it is therefore difficult to govern inclusion of a requirement in such vague terms. It would be better to remove most of the text and refer to designed and installed in accordance with relevant sections of BS7671		