

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	Graham Cartledge
Company Name	FM Conway Ltd
No. of DCode Stakeholders Represented	n/a
Stakeholders represented	n/a
Role of Respondent	Interested party
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?	Y
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 FM Conway supports the aim of this change in facilitating this technology, however the redlining is overly prescriptive and G12 should not seek to mandate how we as a designer / charge point operator should design, install or maintain an installation. It should be aligning with BS 7671.</p> <p>There are two main issues with the redlining, the first is that it only refers to using these devices for EV chargers, there are other applications with on-street electrically powered street furniture located on the public highway. G12 should not be limiting the use of the technology. The second issue is that G12 is still suggesting a TT approach should be pursued wherever possible, only if it is 'not reasonably practicable' should you use PME with a broken neutral detection device. As a designer it should read that it is up to the designer to design and install equipment in a safe manner that complies with the relevant regulations.</p>

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

¹ Add more rows if required.

Distribution Code Consultation Response Proforma

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 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.</p> <p>The customer is responsible for the design, operation and maintenance of their installation.</p> <p>Section 6 goes into too much detail in describing the customer's installation. This detail is for the customer to address in their own design.</p> <p>Much of the text in Section 6 should be removed or transferred to a separate guidance document.</p> <p>"Where it is not reasonably practicable to install a TT system earthing arrangement at on-street locations, an additional form of protection should be installed." This statement still implies TT is the preferred earthing arrangement on-street, it should be up to the designer to decide on their approach. Suggest this is deleted and left as a straightforward choice of options for the designer.</p>		

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	6.2.15			<p>There is no mention of the use of PME supplies with additional protection in the form of these broken neutral detection devices being permitted here.</p> <p>These devices have other applications other than EV charging and G12 should not be limiting these applications but aligning itself with BS 7671.</p>		