

## **Received by email - from Energy on the House Ltd**

I'd like to confirm support for Leeds solar's objection to the proposed changes to G83 and their retrospective application. Please see excerpt below for more details.

the changes concerned relate to the changes to the situations where prior application to connect a sub 16amp per phase system is required, and are 2 fold:

referencing

G83/1 5.1.2

G83/2 definitions, close geographic region, & 5.1.1

### 1 - Change to the definition of close geographic region

G83/1 gives no definition of 'close geographic region', but gives 2 examples of 'in the same road / street' or as part of a new housing development.

G83/2 defines 'close geographic region' as being either the postcode area excluding the last 2 digits, so LS16 5XX, or within 500m of the installation.

This is a massive change to the area affected, taking it from basically involving the immediate neighbours within sight of the installation on the same street, or within the same development, to covering an area of up to several thousand houses and in some cases up to 25 miles in length.

FYI we're currently in the middle of a stage 2 application with Northern PowerGrid for around 250 properties in Goole, and they've been happy for us to submit the applications in postcode districts or for the same street, and ignore any that were the only installation in that postcode or street, even though they're virtually all in the same AB1 1XX postcode area.

The current situation is a reasonable approach to determining if multiple installations in a close area are likely to have an impact on the same phase of a local transformer or not. The revised versions have no such logical justification, as they will almost always cover dozens of transformers, which as I understand it, operate independently, so there's hardly any impact on one transformer from having sub 16amp SSEGs installed on other local transformers.

### 2 - Changes to the frame of reference for projects from 'planned projects' in G83/1 to 'plans to or has already installed other SSEGs' in G83/2

Changing from a situation where advance permission is only required for planned projects involving multiple installations to a situation where any project previously installed by an installation company will mean that all future installations in a wide geographic area around that existing installation is a huge change.

It is a change that will lead to experienced local installation companies being at a serious disadvantage in their own local area, as they will inevitably already have installed SSEG's in many of their local LS16 5XX postcode districts, and will therefore have to apply for advance permission to connect for any proposed installations in their local area that happen to be within that same postcode district.

A new installer, or installer from outside the area wouldn't need to request advance permission at all, and could simply install the exact same system under G83/2 stage 1 immediately and just notify the DNO within 28 days afterwards.

I can only assume that this wording slipped in without anyone really considering its impact. If you do leave it in place though I can't see that many companies will have much option other than to ignore this rule or go out of business, so I'd hope you'd not force otherwise compliant companies into such a position. I'm pretty sure this measure would be illegal as it would unfairly discriminate between one company and another, so would expect it to be unenforceable anyway. Effectively then, all it would do would be to grant the DNOs an excuse to cut such installations off at their discretion, which is surely not a situation the regulator should be creating.

We'd be happy to participate in discussions to find a more workable method of determining when advance permission should be required.

Read more: <http://www.electriciansforums.co.uk/photovoltaic-solar-panels-green-energy-forum/62590-massive-changes-g83-rules-solar-pv-installations-needing-advance-permission-2.html#ixzz26BmVysvc>

Kind Regards

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