

Electricity Distribution Licensees,
Distribution Code Review Panel (DCRP)
c/o Energy Networks Association (ENA)

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Dear Electricity Distribution Licensees,

**Authority decision to “send back” Distribution Code DCRP/21/04 – G12 Issue 4
Amendment 2 - Requirements for the Application of Protective Multiple Earthing
to Low Voltage Networks**

We¹ received the Final Report for DCRP/21/04² from the Distribution Code Review Panel (DCRP) on the 16 August 2021. ENA Engineering Recommendation (EREC) G12 is an Annex 2 document to the Distribution Code which provides recommendations for the application of protective multiple earthing (PME) to low voltage networks. The proposed EREC G12 Issue 4 Amendment 2 would modify the requirements for earthing of electric vehicle charging points (EVCPs) connected to street electrical fixtures taking into account the use of neutral disconnection devices. In addition, the annex document has been imported into the latest ENA engineering document template and necessary editorial changes carried out to ensure compliance with relevant conventions and formatting. The major proposed changes include:

- A new Section 6.2.16 to include specific requirements for EVCPs connected to street electrical fixtures. This includes the use of “open neutral” disconnection devices.
- Update to the section numbers from 6.2.16 onwards to align with the addition of a new section at 6.2.16.
- Significant changes to clause numbering to conform to the latest ENA engineering document template.

¹ References to the “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day to day work. This decision is made by or on behalf of GEMA.

² Distribution Code proposals, final reports and representations can be viewed at: <http://www.dcode.org.uk/areas-of-work/> and <http://www.dcode.org.uk/consultations/>

We have reviewed the Final Report and cannot properly form an opinion on the approval of the modification proposal based on the information submitted. We direct that the Final Report is revised and resubmitted. We are therefore sending the Final Report back to the DCRP to address the issues we have identified below.

1. We are concerned that the final report did not address a key issue raised in the consultation feedback response. This relates to whether Distribution Network Operators (DNOs) have the legal capacity to apply the requirements of section 6.2.16 of EREC G12 which demands that customers build their installations to different specifications depending on the installation's use case. We need the DCRP to provide more analysis on why this requirement should apply to public but not private domestic settings, and to explain where they derive the power to dictate how a customer's installation should be designed, installed and maintained.
2. The DCRP have not presented a detailed assessment of the proposed modification in the Final Report. Electricity Distribution License³ standard condition 21.9(b) requires, among other things, that Electricity Distribution Licensees provide detailed information on the reasons for their assessment of the proposed modification against the distribution code objectives. We expect licensees to provide this assessment.
3. We are of the view that the wording "reasonably practicable to install a TT system" in 6.2.16.1 means the requirements of this section, as drafted, would be a decision for the installer. We consider that it would be useful for clarity to be provided in respect of this obligation which could include examples (illustrative and not exhaustive) of situations requiring installation of additional form of protection should be included in the text.

After addressing the issues identified above and revising the Final Report accordingly, the DCRP should resubmit it to the Authority for a decision. We expect a rapid turnaround to this send back decision from the DCRP, but in any case, the DCRP should resubmit the Report to Authority as soon as practicable.

Niall McDonald

Principal Engineer

Signed on behalf of the Authority and authorised for that purpose

³ https://www.ofgem.gov.uk/sites/default/files/docs/2021/02/electricity_distribution_consolidated_standard_license_conditions_22_01_2021.pdf