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Dear Gareth

#### **ENGINEERING RECOMMENDATIONS – G59/2**

Many thanks for extending the time to allow us to review this document and provide comments. We have the following comments that hopefully you will be able to accommodate.

i) Page 23 clause 7.3.4e - Out of phase capabilities

This concerns out-of-phase capability of switchgear and as such it is EAWR (Regulation 5) issue, which is an absolute duty. The wording of the second sentence does not reflect this duty and could be considered to instruct dutyholders to ignore it. We suggest as a minimum that a footnote is added stating:

*'EAWR Regulation 5 requires that no electrical equipment shall be put into use where its strength and capability may be exceeded in such a way as may give rise to danger.'*

ii) Page 75 clause 12.3.8 - written records.

Whilst it is good practice to keep written records of the installation and commissioning tests, it is unlikely that HSE would wish to routinely inspect these. The legislation to which we work (EAWR & ESQCR) does not have specific requirements for such records to be retained, although HSR25 paragraph 69 does mention the keeping of records. HSE's interest in them would probably only arise if we were undertaking an investigation of an incident. Therefore, we propose the deletion of the words "such as the Health & Safety Executive".

iii) Page 117 clause 13.7.6.9

There is an error in the reference to the Wiring Regulations BS7671. BS7671 is not a harmonised document (hence why it is not referred to as BS EN 7671). We would suggest the deletion of the word 'harmonised' in the second line of this paragraph.

I hope that you are able to accommodate these suggestions and of course please get in touch if you wish to discuss further.

Yours sincerely

A handwritten signature in black ink that reads "Julian Delic". The signature is written in a cursive style with a large initial 'J'.

Julian Delic

Cc Ken Morton, E&C CTG  
John Steed, FOD SG, Portfolio Holder ESQCR