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Dear Gareth

Notice of the requirement on DNOs to establish a DG Connections Guide and DG Information Strategy

I refer to the letter and draft Directions issued by Rachel Fletcher on 8 July in respect of the above and would like to thank Ofgem for the opportunity to provide comments.

In general HSE welcomes this Direction and supports the concept of the development of a common set of guidance documents for the potential application of distributed generation (DG) within electricity networks. It is not clear to us if the intention is to produce one set of common documents to which all DNOs contribute and thus represent a combined view or if the intention is to have a set of documents produced by individual DNOs but with a common content. Our view is that the former would be preferable being simpler for a distributed generator to access and ensuring consistency of any guidance.

While supporting this approach we are of course keen to ensure that safety engineering requirements are covered in these guides. We recognise that not all DG methods have the same safety engineering requirements; for example in relation to photovoltaic arrays (PV) where there are still significant technical issues to be resolved in (a) including overcurrent protection within a PV array and (b) achieving isolation of an array when it has developed a fault. Although the draft Direction for the guides currently mentions health and safety considerations in relation to the statutory and regulatory framework, we feel that mention could helpfully be made also of safety engineering requirements with reference to appropriate references (e.g. relevant ENA and ESC documents). For example, in relation to paragraph 25A.3(d) of the Licence where information relating to engineering and other technical matters

relevant to the commissioning, energisation, and maintenance of DG connections are mentioned we would see it as useful to highlight the need to consider safety engineering requirements.

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

Yours sincerely

A handwritten signature in cursive script that reads "Julian Delic".

Julian Delic