



# Review of technical decision for WorkSafe New Zealand



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Author: **Graham Kenyon**  
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**G Kenyon Technology Ltd**  
15 Westmorland Ave,  
Thornton-Cleveleys,  
Lancashire.  
FY5 2LX.  
t: +44 (0) 753 985 1252  
w: [www.gkenyontech.com](http://www.gkenyontech.com)

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## 1 Introduction

### 1.1 Formal details

- 1.1.1 This report has been prepared by Graham Harry Kenyon, Managing Director and Principal Consultant of G Kenyon Technology Ltd, 15, Westmorland Ave, Thornton-Cleveleys, Lancashire, FY5 2LX.
- 1.1.2 I am a Chartered Engineer, and Member of the Institution of Engineering and Technology in the United Kingdom, with a career history of over 30 years. I practise as an independent international electrical engineering consultant with relevant experience in electrical installations, and electrical product assurance and safety, globally. I have been in my current position for 10 years 10 months, previous to which my experience was engineering and technical assurance, for projects developing specialist systems for major infrastructure programmes. I have been actively involved with standardization in the electrotechnical sector for around 20 years, and have held formal qualifications in UK electrical installation design, installation and verification practice since 1992. I am the current Chair of joint IET/BSI Committee JPEL/64, which is the UK national committee responsible for a number of standards including BS 7671 *Requirements for Electrical Installations (IET Wiring Regulations, 18th Edition)*, and the international IEC 60364 series, and also the current Chair of UK technical committee GEL/600 responsible for BS 7430 *Code of Practice for Earthing*. I am the author of an extensive range of electrotechnical industry guidance and training publications for the UK; a comprehensive list can be found at: <https://www.gkenyontech.com/the-principal/publications/>.
- 1.1.3 I have been engaged by WorkSafe New Zealand to conduct a technical review, which is outlined in the background to this report (Section 1.2).

### 1.2 Background

- 1.2.1 Schedule 2 to the New Zealand Electricity (Safety) Amendment Regulations 2025 [reference 1] deletes Clauses 2.3.2.1.2(b) and (c) from AS/NZS 3000:2018 (including Amendments 1, 2 and 3) [reference 2].
- 1.2.2 The provisions of Clauses 2.3.2.1.2(b) and (c) from AS/NZS 3000:2018 (including Amendments 1, 2 and 3) [reference 2] relate to conditions for switching neutral conductors in electrical installations, and prohibition of switching of protective earthing conductors and combined protective earth and neutral (PEN) conductors. Specific provisions of these Clauses are examined in Section 2 of this Report.
- 1.2.3 The intent of deleting Clauses 2.3.2.1.2(b) and (c) from AS/NZS 3000:2018 (including Amendments 1, 2 and 3) [reference 2] for New Zealand was to 'future proof' the New Zealand Electricity (Safety) Amendment Regulations 2025 [reference 1], to facilitate:
- Improvements in the integrity of electricity supplies to homes as a result of power outages in the distribution network, by permitting switching arrangements to 'island' the installation to operate from a source of energy independent from the public distribution network (for example, temporary generators or renewable energy systems with battery storage); and
  - Permit the future use of protective devices that can operate to disconnect electric vehicles from all live conductors, and the protective earthing system, in the event of detection of conditions indicative of a broken PEN conductor upstream of the supply to the electric vehicle charging equipment. The Institution of Engineering and Technology (IET) in the UK published a standard for such devices, IET 01:2024 [reference 3].

## 2 Risks associated with removal of Clauses 2.3.2.1.2 (b) and (c) from AS/NZS 3000:2018

### 2.1 Clauses 2.3.2.1.2 of AS/NZS 3000:2018 [reference 2]

2.1.1 Clause 2.3.2.1.2 of AS/NZS 3000:2018 [reference 2] is as follows (highlights are made for clarity in later paragraphs of this review report):

#### 2.3.2.1.2 Alternating current systems

Provisions for isolation of conductors in a.c. systems are as follows:

(a) Active conductors All active conductors of an a.c. circuit shall be capable of being isolated by a device for isolation.

(b) Neutral conductor:

(i) No switch or circuit-breaker shall be inserted in the neutral conductor—

(A) of consumer mains; or

(B) where the neutral conductor is used as a combined protective earthing and neutral (PEN) conductor for protective earthing of any portion of an electrical installation.

NOTE: This requirement applies to situations such as an earth sheath return (ESR) system or a submain neutral used for earthing of an electrical installation in an outbuilding in accordance with Clause 5.5.3.1.

(ii) A switch or circuit-breaker may operate in the neutral conductor of circuits other than those in Item (i) where—

(A) the neutral pole of a multi-pole switch or circuit-breaker, having an appropriate short-circuit breaking and making capacity, is linked and arranged to switch substantially together with all active poles; or

(B) the switch or circuit-breaker is linked with corresponding switches so that the neutral contact cannot remain open when the active contacts are closed.

A switched neutral pole shall not open before and shall not close after the active pole(s).

(iii) Where an item of switchgear is required to disconnect all live conductors of a circuit, it shall be of a type such that the neutral conductor cannot be disconnected or reconnected without the respective active conductors also being disconnected or reconnected.

NOTE: The manual disconnection and connection of neutral conductors should be as follows:

(a) The active conductors should be disconnected before the neutral conductors.

(b) The neutral conductors should be connected before the active conductors.

Refer to AS/NZS 4836 for safe work practices.

(iv) A switch in the control circuit of a fire pump shall operate in the neutral conductor in accordance with Clause 7.2.5.6.4.

In accordance with Clause 2.5.1.1, no fuse shall be inserted in a neutral conductor.

(c) Switching of earthing conductor prohibited An earthing conductor shall not be isolated or switched.

A conductor used as a combined protective earthing and neutral (PEN) conductor shall not be isolated or switched.

- 2.1.2 Clause 2.3.2.1.2 (b) of AS/NZS 3000:2018 [reference 2], highlighted with a blue outline in paragraph 2.1.1 of this report, divided into four sub-clauses, numbered 2.3.2.1.2 (b)(i), 2.3.2.1.2 (b)(ii), 2.3.2.1.2 (b)(iii) and 2.3.2.1.2 (b)(iv). The sub-clauses deal with prohibitions on, or switching of, neutral conductors, including PEN conductors, and are analysed in subsequent Sections of this report as follows:
- (a) Section 2.2 summarizes facts regarding the reasons for deletion of 2.3.2.1.2 (b) and (c) of AS/NZS 3000:2018 [reference 2].
  - (b) Section 2.3 summarizes facts regarding risks associated with switching a PEN conductor that 2.3.2.1.2 (b) (i) and the second paragraph of 2.3.2.1.2 (c) intend to prevent.
  - (c) Section 2.4 summarizes facts regarding the risks associated with switching a neutral conductor other than a PEN conductor, without opening the line (active) conductors, that 2.3.2.1.2 (b) (ii) and (iii) intend to prevent.
- 2.1.3 Clause 2.3.2.1.2 (c) of AS/NZS 3000:2018 [reference 2], highlighted with a green outline in paragraph 2.1.1 of this report, prohibits switching of an earthing conductor (protective conductor in IEC 60364 series and BS 7671) including a PEN conductor. These are analysed in subsequent Sections of this report as follows:
- (a) Section 2.3 summarizes facts regarding risks associated with switching a PEN conductor that 2.3.2.1.2 (b) (i) and the second paragraph of 2.3.2.1.2 (c) intend to prevent.
  - (b) Section 2.5 summarizes facts regarding the risks associated with switching of an earthing conductor that 2.3.2.1.2 (c) of AS/NZS 3000:2018 [reference 2] intends to prevent.
- 2.1.4 The deletion of Clause 2.3.2.1.2 (b)(iv) of AS/NZS 3000:2018 [reference 2] was, on review, considered inconsequential, as it simply makes reference to two other Clauses, 7.2.5.6.4 and 2.5.1.1, neither of which are deleted by the Electricity (Safety) Amendment Regulations 2025 [reference 1].

## 2.2 Reasons for deletion of 2.3.2.1.2 (b) and (c) of AS/NZS 3000:2018 [reference 2]

- 2.2.1 Standards are currently in development for switching arrangements for operation of electrical installations in New Zealand in island mode.
- 2.2.2 Island mode is the mode of operation of an electrical installation in which is disconnected from the grid, and supplied from a local energy supply, for example a rotary generator, or inverters supplied by batteries, wind, and/or solar PV.
- 2.2.3 For safety of those operating on a public supply network, it is known that operation of an installation in island mode will involve disconnection of live (active and neutral) conductors within the installation from the grid.
- 2.2.4 A complicating factor is the multiple earthed neutral (MEN) arrangements can be extended to other parts of an installation such as an outbuilding. There are two key aspects that might affect the use of MEN arrangements within an installation with renewable energy systems in island mode:
- (a) Due to low fault currents associated with renewable technology inverters, RCDs are often necessary, and these are not compatible with PEN conductors.
  - (b) It is generally considered dangerous practice to recombine neutral and protective (earthing) functions once they are separated. This is prohibited in BS 7671.

- 2.2.5 It is not known at this stage precisely how island mode switching arrangements will be achieved in standards and guidance in New Zealand, especially given the complicating factors outlined in paragraph 2.2.4.
- 2.2.6 . However, standards and guidance are already in place for the manual temporary connection of a generator by licensed electrical workers, see:
- (a) WorkSafe New Zealand Technical Bulletin Connecting a generator to the wiring of a house or building following an emergency;
  - (b) AS/NZS 4509 .1 *Stand-alone power systems part 1: Safety and installation* [reference 5].
- 2.2.7 Consideration was also given to the possible future use of protective devices that can operate to disconnect electric vehicles from all live conductors, and the protective earthing system, in the event of detection of conditions indicative of a broken PEN conductor upstream of the supply to the electric vehicle charging equipment. The Institution of Engineering and Technology (IET) in the UK published a standard for such devices, IET 01:2024 [reference 3], termed ‘open PEN detection devices’ (OPDDs).
- 2.2.8 During a fault resulting from a broken PEN conductor, touch-voltages on conductive parts of electric vehicles connected to a charging point can, under certain circumstances, exceed the line-to-Earth voltage if the break in the PEN conductor is in a three-phase portion of the distribution system. OPDDs remove the danger by disconnecting all live (active and neutral) conductors, and, at the same time, the protective (earthing) conductor to the charging point, which would otherwise continue to transfer the raised PEN conductor potential to conductive parts of the vehicle. This necessarily requires switching of the earthing conductor.

### 2.3 Risks associated with switching a PEN conductor

- 2.3.1 Sub-clause 2.3.2.1.2 (b)(i) of AS/NZS 3000:2018 [reference 2] prohibits switching of a neutral conductor of the consumer mains, or a PEN conductor.
- 2.3.2 The effect of switching a PEN conductor is to remove both protective earthing and neutral functions from exposed-conductive-parts downstream of the switch. The risks associated with switching a PEN conductor depend on whether the circuit (or service) associated with the PEN conductor is single-phase or three-phase, and whether multiple earthing (MEN) provisions are available downstream of the disconnected PEN conductor.
- 2.3.3 It is not desirable to switch a PEN conductor under any circumstances. Not all countries permit switching of protective conductors in their national wiring codes. The UK is one country that does, but even in the UK, switching of PEN conductors is not permitted (see Appendix C Section C4).
- 2.3.4 If a PEN conductor is switched at the same time as the other live conductors:
- (a) The earthing resistances on an MEN distribution network as a whole are changed.
  - (b) Touch-voltages can develop between exposed-conductive-parts, and earthing (protective) conductors, on both sides of the switched conductor.
- 2.3.5 If a PEN conductor is switched and line (active) conductors are not also disconnected, the resulting impact depends on the following factors:
- (a) whether the circuit or system is single-phase or three-phase; and
  - (b) if the PEN conductor is part of an MEN system, or there is bonding or fortuitous contact with the Earth either directly or indirectly through extraneous-conductive-

parts, so that there is a PEN return path around the switched PEN conductor due to low effective earth electrode resistance.

- 2.3.6 In single-phase circuits and systems with PEN conductors, exposed-conductive-parts downstream of an open-circuit PEN conductor can have a touch-voltage of up to the line-to-Earth voltage with respect to the general mass of Earth. This risk can be reduced inside buildings where main protective bonding is in place.
- 2.3.7 In three-phase circuits and systems with PEN conductors, the PEN conductor downstream of the open-circuit PEN conductor is a neutral, and will assume a voltage dependent on the balance of loads connected downstream of the open-circuit PEN conductor, which appears as a touch-voltage with respect to the general mass of the Earth at exposed-conductive-parts and, if applicable, bonded extraneous-conductive-parts downstream of the open-circuit PEN conductor. The touch-voltage, in some conditions, can exceed the line-to-Earth voltage with respect to the general mass of Earth, and in rare conditions could approach the line-to-line voltage.
- 2.3.8 The touch-voltages described in paragraphs 2.3.6 and 2.3.7 can be reduced, to an extent, by:
- (a) Provision of earth electrodes with very low values earth electrode resistances, connected to the PEN conductor downstream of the disconnection. The values of earth electrode resistance that reduces the possible touch-voltages to a level that might be considered generally safe in dry conditions depends on the connected load. Based on calculations carried out for electric vehicle charging installations supplied by protective multiple earthing (PME) systems in the UK:
    - (i) In single-phase systems, values of earth electrode resistance of less than 1  $\Omega$  would be needed to maintain touch-voltages below 70 V AC for supplies up to 100 A.
    - (ii) In three-phase systems the touch-voltage developed depends on phase unbalance. Similar values of earth electrode resistance would be required to maintain touch-voltages below 70 V AC for supplies up to 100 A, unless phase unbalance can be guaranteed to be better than 100 %, 60 %, 37 %.
  - (b) Inside buildings, by provision of main protective bonding, although note that conductive parts connected to the protective bonding, that are accessible outdoors, will then be subject to a potentially dangerous touch-voltage.
- 2.3.9 In the case of a dangerous touch-voltage described in paragraphs 2.3.6 and 2.3.7, neither overcurrent protective devices nor residual current devices (RCDs) will operate to provide automatic disconnection of the touch-voltage.

## 2.4 Risks associated with switching a neutral conductor other than a PEN conductor

- 2.4.1 Sub-clauses 2.3.2.1.2 (b)(ii), 2.3.2.1.2 (b)(iii) and 2.3.2.1.2 (b)(iv) of AS/NZS 3000:2018 [reference 2] relate to conditions that must be satisfied for switching a neutral conductor (other than a PEN conductor). These can be summarized as follows:
- (a) The neutral is not to be switched without also switching the associated active (line) conductors.
  - (b) When switching all live (active and neutral) conductors, the switching is to be arranged so that either:

- (i) all live (active and neutral) poles are linked so that all live contacts make and break at substantially the same time; or
  - (ii) all live (active and neutral) poles are linked so that the neutral contact does not open before the active (line) contact(s), and the neutral contact does not close after the active (line) contact(s).
- 2.4.2 In single-phase systems and circuits, disconnecting a neutral conductor without switching the associated line conductors generally disconnects power from loads; however, all live conductors downstream of the disconnected neutral conductor remain live. This could post a shock risk to anyone maintaining the installation, including removal of lamps at general lighting service points.
- 2.4.3 In three-phase systems and circuits, disconnecting a neutral without also disconnecting the active (line) conductors means that the neutral is 'floating' and will assume a voltage, relative in the phasor world to the live conductors, based on the balance of the loads downstream of the disconnected neutral. In this case, the voltage between any line and neutral could attain a voltage of up to the line-to-line voltage, or in rare cases with non-unity power factor, exceed the line-to-line voltage.
- 2.4.4 Undervoltage is often experienced by equipment in general; however, due to the magnitude of overvoltage experienced by single-phase equipment connected between a line and neutral downstream of the switched neutral, serious overvoltage can be experienced. Overvoltage from broken neutrals in three-phase systems has been known to not only damage equipment, but also lead to fire. The situation in a real open neutral situation is often exacerbated by the fact that, as modern equipment with internal electronic and control circuitry becomes inoperative or is damaged by overvoltage, the balance of loads is continually shifting.
- 2.4.5 Where the timing arrangements summarized in Paragraph 2.4.1(b) of this report are not met, the neutral can be disconnected when the live conductors are connected. This can lead to the risks described in Paragraphs 2.4.2 to 2.4.4 inclusive; however, in this case, the risk of fire resulting is generally less because of the short time involved. Damage to equipment, however, can still result, particularly if a three-phase circuit is being switched.

## 2.5 Risks associated with switching an earthing conductor (protective conductor) other than a PEN conductor

- 2.5.1 Clause 2.3.2.1.2 (c) of AS/NZS 3000 [reference 2] effectively prohibits switching or disconnection of the earthing (protective) conductor. Risks associated with switching of a PEN conductor are summarized in Section 2.3 of this report.
- 2.5.2 Switching earthing (protective) conductors without switching live conductors is generally considered dangerous as it removes the protective provision of automatic disconnection of supply, in a manner that, if a fault were to occur, exposed-conductive-parts would remain hazardous live.
- 2.5.3 In many installations, protective conductor currents result from electromagnetic compatibility filters, and if the protective conductor is open-circuit, such currents can flow to Earth through someone in contact with exposed-conductive-parts. If the protective conductor is interrupted to a number of items of equipment, or a number of circuits, that remain live, the sum of protective conductor currents can, on their own, be lethal with no electrical fault, unless the protective conductor remains continuous.

2.5.4 There is concern regarding switching of protective conductors (other than through the removal and reinsertion of a multi-pole plug and socket-outlet), that if a switching device has a protective conductor contact, this can, over time, fail. A user may be unaware of the damage, leading to permanent disconnection of the earthing (protective) conductor. Such risks can be alleviated by only permitting switching of the protective conductor by dedicated equipment to an appropriate product standard that includes durability tests, and/or where there is monitoring of the earthing system through the protective conductor.

## 2.6 Summary of potential risks associated with the removal of Clauses 2.3.2.1.2 (b) and (c) from AS/NZS 3000:2018

2.6.1 See Table 2.1.

*Table 2.1 Potential risks associated with the removal of Clauses 2.3.2.1.2 (b) and (c) from AS/NZS 3000:2018*

Removal of provision in AS/NZS 3000	Potential hazard	Cause	For hazard detail, see Paragraph
2.3.2.1.2 (b)(i) and 2.3.2.1.2 (c)	Possible electric shock or secondary effects	<ul style="list-style-type: none"> <li>Hazardous touch-voltages between simultaneously-accessible exposed-conductive-parts connected to different earthing systems (IEC 60364-4-41, Clause 411.3.1.1)</li> </ul>	2.3.2, 2.3.3, 2.3.6, 2.3.7, 2.3.8, 2.3.9
2.3.2.1.2 (b)(i) and 2.3.2.1.2 (c)	Possible electric shock or secondary effects.	<ul style="list-style-type: none"> <li>Change of earthing resistances in 'global earthing' system.</li> <li>Hazardous touch-voltages between simultaneously accessible exposed-conductive-parts connected to different earthing systems (IEC 60364-4-41, Clause 411.3.1.1)</li> </ul>	2.3.4
2.3.2.1.2 (b)	Possible electric shock or secondary effects during maintenance	<ul style="list-style-type: none"> <li>Failure to disconnect live conductors on operation of devices that ought to provide safe disconnection/isolation</li> </ul>	2.4.2, 2.4.3, 2.4.5
2.3.2.1.2 (b)(ii), 2.3.2.1.2 (b)(iii) and 2.3.2.1.2 (b)(iv)	Possible damage to equipment	<ul style="list-style-type: none"> <li>Disconnected neutral in a three-phase system or circuit when active (line) conductors remain connected.</li> </ul>	2.4.4, 2.4.5
2.3.2.1.2 (b)(ii), 2.3.2.1.2 (b)(iii) and 2.3.2.1.2 (b)(iv)	Possible fire/burns	<ul style="list-style-type: none"> <li>Disconnected neutral in a three-phase system or circuit when active (line) conductors remain connected.</li> </ul>	2.4.4, 2.4.5
2.3.2.1.2 (c)	Possible electric shock or secondary effects.	<ul style="list-style-type: none"> <li>Disconnected protective conductor and high protective conductor currents.</li> </ul>	2.5.2
2.3.2.1.2 (c)	Possible electric shock or secondary effects.	<ul style="list-style-type: none"> <li>Disconnected protective conductor and electrical fault that would normally conclude with automatic disconnection of supply.</li> </ul>	2.5.3, 2.5.4

### 3 Existing mitigation in place for the risks outlined in Section 2 of this report

#### 3.1 Introduction

- 3.1.1 During my investigation, there was evidence that specific risks summarized in Section 2 of this report are mitigated, at least in part, by other provisions already in place.
- 3.1.2 The mitigation and residual risk are summarized in Table 3.1.

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Table 3.1 Potential mitigation already in place of risks associated with the removal of Clauses 2.3.2.1.2 (b) and (c) from AS/NZS 3000:2018

Removal of provision in AS/NZS 3000	Potential hazard	Cause	For hazard detail, see Paragraph	Mitigations already in place	Residual risk actions
2.3.2.1.2 (b)(i) and 2.3.2.1.2 (c)	Possible electric shock or secondary effects	<ul style="list-style-type: none"> <li>Hazardous touch-voltages between simultaneously-accessible exposed-conductive-parts connected to different earthing systems (IEC 60364-4-41, Clause 411.3.1.1)</li> </ul>	2.3.2, 2.3.3, 2.3.6, 2.3.7, 2.3.8, 2.3.9	Installing this type of switching is highly likely to involve licensed workers/inspectors.	<ol style="list-style-type: none"> <li>Switching of PEN conductors appears to be permissible. Guidance or standards are necessary to prevent switching of PEN conductors.</li> <li>It is advisable, for the implementation of island mode switching, to prohibit MEN/PEN conductors in parts of electrical installations that are to be islanded.</li> </ol>
2.3.2.1.2 (b)(i) and 2.3.2.1.2 (c)	Possible electric shock or secondary effects.	<ul style="list-style-type: none"> <li>Change of earthing resistances in 'global earthing' system.</li> <li>Hazardous touch-voltages between simultaneously accessible exposed-conductive-parts connected to different earthing systems (IEC 60364-4-41, Clause 411.3.1.1)</li> </ul>	2.3.4	Installing this type of switching is highly likely to involve licensed workers/inspectors.	<ol style="list-style-type: none"> <li>Standard arrangements for automatic switching of island mode are yet to be addressed.</li> <li>In a global market, not all products meet every country's national requirements, and without industry guidance, other countries have found particular safety issues associated with islanding.</li> </ol>

Removal of provision in AS/NZS 3000	Potential hazard	Cause	For hazard detail, see Paragraph	Mitigations already in place	Residual risk actions
2.3.2.1.2 (b)(ii), 2.3.2.1.2 (b)(iii) and 2.3.2.1.2 (b)(iv)	Possible damage to equipment	<ul style="list-style-type: none"> <li>Disconnected neutral in a three-phase system or circuit when active (line) conductors remain connected.</li> </ul>	2.4.4, 2.4.5	<p>Installing this type of switching is highly likely to involve licensed workers/inspectors.</p> <p>Product standards, such as IEC 60947 series, IEC 60947-6-1 and IEC 60669 series, contain requirements that mimic AS/NZS 3000 Clause 2.3.2.1.2 (b)(ii) and (iii)</p>	5. Standards or guidance for other products and installation arrangements, to replace the provision of AS/NZS 3000 Clause 2.3.2.1.2 (b)(ii) and (iii) is necessary.
2.3.2.1.2 (b)(ii), 2.3.2.1.2 (b)(iii) and 2.3.2.1.2 (b)(iv)	Possible fire/burns	<ul style="list-style-type: none"> <li>Disconnected neutral in a three-phase system or circuit when active (line) conductors remain connected.</li> </ul>	2.4.4, 2.4.5	<p>Installing this type of switching is highly likely to involve licensed workers/inspectors.</p> <p>Product standards, such as IEC 60947 series, IEC 60947-6-1 and IEC 60669 series, contain requirements that mimic AS/NZS 3000 Clause 2.3.2.1.2 (b)(ii) and (iii)</p>	
2.3.2.1.2 (c)	Possible electric shock or secondary effects.	<ul style="list-style-type: none"> <li>Disconnected protective conductor and high protective conductor currents.</li> </ul>	2.5.2	<p>Installing this type of switching is highly likely to involve licensed workers/inspectors.</p> <p>For non-automatic arrangements, AS/NZS 4509.1 applies.</p>	6. Consider reinstating 2.3.2.1.2 (c), or implementing necessary requirements similar to BS 7671 (see Appendix C, C5). This will permit the use of OPDDs as well as transfer switching that also transfers the protective (earthing) function between sources of supply.
2.3.2.1.2 (c)	Possible electric shock or secondary effects.	<ul style="list-style-type: none"> <li>Disconnected protective conductor and electrical fault that would normally conclude with automatic disconnection of supply.</li> </ul>	2.5.3, 2.5.4		

## 4 Conclusion

- 4.1 Changes to the Electricity (Safety) Regulations were necessary to safely implement renewable technologies, and consider provisions for supply continuity under certain circumstances.
- 4.2 The deletion of Clauses 2.3.2.1.2(b) and (c) from AS/NZS 3000:2018 (including Amendments 1, 2 and 3) [reference 2] for New Zealand was the selected approach to achieve the aim outlined in paragraph 4.1.
- 4.3 Table 3.1 outlines specific issues that result from the decision, some of which are mitigated as identified in the table.
- 4.4 The residual risks can be summarised as follows:
  - (a) Switching of PEN conductors should be prohibited. The reintroduction of 2.3.2.1.2 (b)(i) should be considered, or addressed in subsequent guidance.
  - (b) It is recommended that the use of PEN conductors in parts of installations energized in island mode is strongly discouraged.
  - (c) Standards or guidance for manual or automatic island mode switching arrangements should be provided.
  - (d) Not all product standards include timing arrangements for switching neutral conductors in conjunction with other live conductors. The reintroduction of 2.3.2.1.2 (b)(ii), 2.3.2.1.2 (b)(iii) should be considered, or addressed in subsequent guidance and/or product standards.

## Appendix A References and related documents

No.	Reference*
1.	New Zealand Electricity (Safety) Amendment Regulations 2025, last accessed 18 February 2026 from: <a href="https://www.legislation.govt.nz/regulation/public/2025/0225/latest/whole.html">https://www.legislation.govt.nz/regulation/public/2025/0225/latest/whole.html</a>
2.	AS/NZS 3000:2018 (including Amendments 1, 2 and 3) <i>Electrical installations “Wiring Rules”</i>
3.	Institution of Engineering and Technology Standard IET 01:2024 <i>Open combined protective and neutral (PEN) conductor detection devices (OPDDs)</i> (IET, London, ISBN 978-1-83953-885-8)
4.	WorkSafe New Zealand Technical Bulletin <i>Connecting a generator to the wiring of a house or building following an emergency</i> , last accessed 18 February 2026 from: <a href="https://www.worksafe.govt.nz/dmsdocument/57543-technical-bulletin-connecting-a-generator-to-the-wiring-of-a-house-or-building-following-an-emergency/latest/">https://www.worksafe.govt.nz/dmsdocument/57543-technical-bulletin-connecting-a-generator-to-the-wiring-of-a-house-or-building-following-an-emergency/latest/</a>
5.	AS/NZS 4509.1:2009 <i>stand-alone power systems part 1: Safety and installation</i>
6.	BS 7671:2018+A2:2022+ A3:2024 <i>Requirements for Electrical Installations. IET Wiring Regulations Eighteenth Edition</i>
7.	BS EN 60947-6-1:2005+A1:2014 <i>Low-voltage switchgear and controlgear – Part 6-1: Multiple functional equipment – Transfer switching equipment</i>
8.	BS EN IEC 60947-6-1:2023 <i>Low-voltage switchgear and controlgear – Part 6-1: Multiple functional equipment – Transfer switching equipment</i>
9.	BS EN 60947-1:2007+A2:2014 <i>Low-voltage switchgear and controlgear – Part 1: General rules</i>
10.	BS EN 60947-1:2021 <i>Low-voltage switchgear and controlgear – Part 1: General rules</i>
11.	IEC 60364-5-53:2015 (HD 60364-5-57:2017) <i>Electrical installations of buildings – Part 5-53: Selection and erection of electrical equipment – Isolation, switching and control</i>
12.	Institution of Electrical Engineers <i>General Rules Recommended for Wiring of the Supply of Electrical Energy</i> , Fourth Edition, 1903
13.	Institution of Electrical Engineers <i>Wiring Rules</i> , Seventh Edition 1916
14.	Institution of Electrical Engineers <i>Regulations for the Electrical Equipment of Buildings</i> , Fourteenth Edition 1966
15.	linked switch. (n.d.) McGraw-Hill Dictionary of Architecture and Construction. (2003). Retrieved 17 February 2026 from <a href="https://encyclopedia2.thefreedictionary.com/linked+switch">https://encyclopedia2.thefreedictionary.com/linked+switch</a>
16.	BIPM The International System of Units (SI) 9th Edition 2019 (updated to 2024)
17.	NIST Special Publication 811 Guide to the International System of Units (SI)
18.	NIST Technical Note 1297 Guidelines for Evaluating and Expressing the Uncertainty of NIST Measurement Results 1994 Edition

\* References which are without a date or revision / version are intended to refer the reader to the latest revision / version.

## Appendix B Abbreviations and specialist terms

Abbreviations for SI Units, SI Derived Units, and related Non-SI Units are not listed here due to their widespread use and standard application. Details of these units can be found in references 16 and 17.

Term	Meaning
AC	Alternating current <b>Note:</b> 'a.c.' is used in AS/NZS 3000, and in older IEC, CENELEC and British standards. In the text of this Report, 'AC' is used, following current IEC usage, unless quoting such standards directly.
AS/NZS	Australian Standard/New Zealand Standard (National Standards jointly published by Standards Australia and Standards New Zealand)
BIPM	Bureau International des Poids et Mesures (International Bureau of Weights and Measures)
BS	British Standard (UK National Standards)
DC	Direct current <b>Note:</b> 'd.c.' is used in AS/NZS 3000, and in older IEC, CENELEC and British standards. In the text of this Report, 'DC' is used, following current IEC usage, unless quoting such standards directly.
EN	Euro-Norm (European Union Regional Standard Standard)
IEC	International Electrotechnical Commission
IET	Institution of Engineering and Technology (formerly the IEE)
IEE	Institution of Electrical Engineers
MEN	Multiple Earthed Neutral
ISO	International Organisation for Standardisation
NIST	National Institute of Standards and Technology (United States of America)
PEN	Protective earth and neutral (combined)
SI	Système Internationale (International System of Units)
UK	United Kingdom

## Appendix C Provisions for and prohibitions on switching protective, neutral and PEN conductors in BS 7671

### C1 General

C1-1 The current national electrical installation standard in the United Kingdom is BS 7671:2018+A2:2022+A3:2024 [reference 6].

### C2 Supply transfer arrangements

C2-1 The selection of switching and earthing arrangements for supply changeover, whether automatic or manual, is specifically covered by Regulation 537.1.5 of BS 7671 [reference 6] which has the following provisions:

**537.1.5** Where an installation is supplied from more than one source of energy, one of which requires a means of earthing independent of the means of earthing of other sources and it is necessary to provide that not more than one means of earthing is applied at any time, a switching device may be inserted in the connection between the neutral point and the means of earthing, provided that the device is:

(i) a multipole, linked switching device arranged to disconnect and connect the earthing conductor for the appropriate source at substantially the same time as the related live conductors, or

(ii) a switching device interlocked with a multipole, linked switching device inserted in the related live conductors such that the earthing conductor for the appropriate source shall not be interrupted before the related live conductors and shall be re-established not later than when the live conductors are reconnected.

Switching devices provided in accordance with (i) and (ii) shall meet the requirements of Chapter 46 for a device for isolation.

### C3 Switching of the neutral conductor

C3-1 Regulation 132.14.2 is a general requirement of BS 7671 [reference 6] and contains the provision that only linked switches or circuit-breakers, either of which also breaks the line conductors, may be used in the neutral conductor:

**132.14.2** No switch or circuit-breaker, except where linked, or fuse, shall be inserted in an earthed neutral conductor. Any linked switch or linked circuit-breaker inserted in an earthed neutral conductor shall be arranged to break all the related line conductors.

### C4 Prohibition on switching a PEN conductor

C4-1 BS 7671 [reference 6] does not permit switching of a PEN conductor, see Regulation 411.4.3:

**411.4.3** In a fixed installation, a single conductor may serve both as a protective conductor and as a neutral conductor (PEN conductor) provided that the requirements of Regulation 543.4 are satisfied. No switching or isolating device shall be inserted in the PEN conductor.

**NOTE:** Regulation 8(4) of the Electricity Safety, Quality and Continuity Regulations prohibits the use of PEN conductors in consumers' installations.

## C5 Prohibition on forming a PEN conductor from separate neutral and protective conductors

- C5-1 BS 7671 [reference 6] does not permit the recombining of separate neutral and protective conductors to re-establish a PEN conductor, see Regulation 543.4.3:

**543.4.3** If, from any point of the installation, the neutral and protective functions are provided by separate conductors, those conductors shall not then be reconnected together beyond that point. At the point of separation, separate terminals or bars shall be provided for the protective and neutral conductors. The PEN conductor shall be connected to the terminals or bar intended for the protective earthing conductor and the neutral conductor. The conductance of the terminal link or bar shall be not less than that specified in Regulation 543.4.5.

## C6 Switching of the protective conductor (other than a PEN conductor)

- C6-1 Regulation 543.3.3.101 of BS 7671 [reference 6] contains the following provisions:

**543.3.3.101** No switching device shall be inserted in a protective conductor, except:

- (i) as permitted by Regulation 537.1.5
- (ii) a multipole, linked switching device in which the protective conductor circuit is not interrupted before the live conductors and is re-established not later than when the live conductors are reconnected
- (iii) a switching device interlocked with a multipole, linked switching device inserted in the live conductors such that the protective conductor circuit shall not be interrupted before the live conductors and shall be re-established not later than when the live conductors are reconnected, or
- (iv) a multipole plug-in device in which the protective conductor circuit shall not be interrupted before the live conductors and shall be re-established not later than when the live conductors are reconnected.

Switching devices provided in accordance with (i), (ii), (iii) and (iv) shall meet the requirements of Chapter 46 and Section 537 for a device for isolation.

Joints for test purposes that can be disconnected only by the use of a tool may be inserted in a protective conductor.

- C6-2 Switching of a protective conductor (including an earthing conductor) is by a single-pole switching device inserted in the conductor, interlocked with a multipole linked switch that operates to disconnect live conductors, is therefore clearly permitted by BS 7671 [reference 6], using the options in:

- (a) indent (i) to Regulation 534.3.3.101, via the option in indent (ii) to Regulation 537.1.3;
- or
- (b) indent (iii) to Regulation 534.3.3.101.

## C7 Meaning of the term 'linked switch' in BS 7671

- C7-1 The term linked switch has been used in BS 7671, and the predecessor UK industry standard commonly known as the 'IEE Wiring Regulations', published by the Institution of Electrical Engineers (IEE) for a period exceeding 120 years. A definition for the term first appeared in Regulation 100 of the Fourth Edition of the IEE Wiring Regulations [reference 12] which was published in 1903:

100. *Linked switches.*— Linked switches are single-pole switches fixed on conductors of different polarity linked together mechanically so as to operate simultaneously.

C7-2 The definition cited in paragraph C7-1 remained in use in subsequent Editions of the IEE Wiring Regulations, from the Fourth to the Sixth, until the Seventh Edition [reference 13] was published in 1916, which contained the following definition introducing a 'definite sequence' of operation:

**Switch, linked.** A switch the blades of which are so linked mechanically as to make or break all poles simultaneously or in a definite sequence.

The definition remained unchanged until the Fourteenth Edition [reference 14] published in 1966 (see paragraph C7-3).

C7-3 The current definition in Part 2 of BS 7671:2018+A2:2022+A3:2024 [reference 6] is:

**Switch, linked.** A switch the contacts of which are so arranged as to make or break all poles simultaneously or in a definite sequence.

This definition has not changed since the Fourteenth Edition of the IEE Wiring Regulations, first published in 1966 [reference 14].

C7-4 There is no definitive statement in the current edition of BS 7671 [reference 6] that the poles of a 'linked switch' are required to be mechanically linked; however the following ought to be considered:

(a) It is generally considered in the industry that the term 'linked switch' refers to a multipole switch in which the linkages are mechanical in nature. For example, the McGraw-Hill Dictionary of Architecture and Construction [reference 15] defines the term 'linked switch' as:

Two or more electric switches which are mechanically connected by operating arms or levers, so as to operate at the same time or in a desired sequence;

and

(b) BS 7671 [reference 6] uses the term 'interlocked' in relation to electrical linking in indent (ii) of Regulation 537.1.5, and indent (iii) of Regulation 543.3.3.101;

and

(c) BS 7671 [reference 6] implements the technical intent of the HD 60364 series published by CENELEC, as listed in the Preface. The facts regarding the technical intent in respect of multipole switching devices being required be mechanically linked are presented in Appendix D, D7 of this report.

## Appendix D Provisions for and prohibitions on switching protective, neutral and PEN conductors in IEC 60364 series

### D1 General

#### D1-1 Relationship with AS/NZS 3000

D1-1-1 The preface to AS/NZS 3000:2018 [reference 2] states that one of the objectives of the revision from AS/NZS 3000:2007 was to ‘maintain alignment with IEC 60364, *Low voltage electrical installations* (series)’.

#### D1-2 Relationship with BS 7671

D1-2-1 BS 7671:2018+A2:2022+ A3:2024 [reference 6] implements the technical intent of CENELEC harmonized documents (HDs) as shown in the Preface to the standard. HD 60364 series implements IEC 60364 series in CENELEC.

### D2 Supply transfer arrangements

D2-1 IEC 60364 series appears to leave supply transfer switching to IEC 60947-6-1. It is not clear what conditions pertain when switching between supplies that have different, and separate, earthing arrangements.

D2-2 IEC 60364-1:2025 defines a ‘system referencing conductor’ to enable earthing of a live conductor to be established, preventing the need to switch a protective conductor, see Clause 1.8.4:

#### 1.8.4 System-referencing-conductors

A system-referencing-conductor (SRC) is a conductor between a live part and an earthing arrangement, enabling the live part to be substantially at the potential of the earthing arrangement. The SRC is neither a neutral conductor nor a protective conductor.

NOTE The application of SRC, shown in Figure 9, Figure 10, Figure 11, Figure 12 and Figure 13, is given to help define the characteristic behaviour of the electric systems.

### D3 Switching of the neutral conductor

D3-1 Clause 530.3.2 of IEC 60364-5-53:2015 prohibits switching of the neutral conductor unless the associated line (active) conductors are also switched:

**530.3.2** Except as provided in 536.2.2.7, in multiphase circuits, single-pole devices shall not be inserted in the neutral conductor.

In single-phase circuits single-pole devices shall not be inserted in the neutral conductor, unless a residual current device complying with the rules of 413.1 of IEC 60364-4-41 is provided on the supply side.

### D4 Prohibition on switching a PEN conductor

D4-1 IEC 60364-4-41:2005+A1:2017 does not permit the switching of a PEN conductor, see Clause 411.4.3:

**411.4.3** In fixed installations, a single conductor may serve both as a protective conductor and as a neutral conductor (PEN conductor) provided that the requirements of 543.4 of IEC 60364-5-54 are satisfied. No switching or isolating device shall be inserted in the PEN conductor.

## D5 Switching of the protective conductor (other than a PEN conductor)

D5-1 IEC 60364-5-54:2011+AMD1:2021 does not permit the switching of a protective conductor, see Clause 543.3.3.

**NOTE:** Some countries, including the United Kingdom, permit switching of the protective conductor under specified conditions.

**543.3.3** No switching device shall be inserted in the protective conductor, but joints which can be disconnected for test purposes by use of a tool may be provided.

D5-2 Similarly, IEC 60364-1, Clause 1.8.3, prohibits switching protective conductors:

1.8.3 Protective conductors

1.8.3.1 General

Protective conductors are those conductors used for protective purposes. Protective conductors are classified into:

- protective earthing conductors;
- protective bonding conductors.

In a protective conductor the electrical continuity shall be maintained. Accordingly, no switching device shall be inserted.

D5-3 A distinction that needs to be raised in respect of paragraph D5-2, is that switching of a protective conductor need not occur, if the connection of a live conductor of the installation to Earth is not classified as a protective conductor, and a the term *system referencing conductor* is defined. See Section D2 of this Appendix.

## D6 Prohibition on forming a PEN conductor from separate neutral and protective conductors

D6-1 IEC 60364-6-54:2011+AMD1:2021 does not permit the does not permit the recombining of separate neutral and protective conductors to re-establish a PEN conductor, see Clause 543.4.3:

**543.4.3** If, from any point of the installation, the neutral/mid-point/line and protective functions are provided by separate conductors, it is not permitted to connect the neutral/mid-point/line conductor to any other earthed part of the installation. However, it is permitted to form more than one neutral/mid-point/line conductor and more than one protective conductor from the PEN, PEL or PEM conductor respectively.

## D7 Requirements for linked switching in IEC 60364-5-53:2015

D7-1 Section 530.3 contains the following provisions:

### **530.3 General and common requirements**

This part of IEC 60364 shall provide compliance with the measures of protection for safety, the requirements for proper functioning for intended use of the installation, and the requirements appropriate to the external influences foreseen. Every item of equipment shall be selected and erected so as to allow compliance with the rules stated in the following clauses of this part and the relevant rules in other parts of this standard.

The requirements of this part are supplementary to the common rules given in IEC 60364-5-51.

**530.3.1** The moving contacts of all poles of multipole devices shall be so coupled mechanically that they make and break substantially together, except that contacts solely intended for the neutral may close before and open after the other contacts.

**530.3.2** Except as provided in 536.2.2.7, in multiphase circuits, single-pole devices shall not be inserted in the neutral conductor.

In single-phase circuits single-pole devices shall not be inserted in the neutral conductor, unless a residual current device complying with the rules of 413.1 of IEC 60364-4-41 is provided on the supply side.

**530.3.3** Devices embodying more than one function shall comply with all the requirements of this part appropriate to each separate function.

Released under the Official Information Act 1987

## Appendix E Provisions for switching the neutral conductor in relevant product standards referenced in Schedule 4 to the Electrical Safety (Amendment) Regulations 2025

### E1 IEC 60947-1

E1-1 Clause 8.1.9 of BS EN IEC 60947-1:2021 (IEC 60947-1:2020) [reference 10] has the following provisions in respect of the neutral pole:

#### **8.1.9 Additional requirements for equipment provided with a neutral pole**

When an equipment is provided with a pole intended only for connecting the neutral conductor, this pole shall be clearly identified to that effect by the letter "N" (see 8.1.8.4).

A switched neutral pole shall break not before and shall make not after the other poles.

If a pole having an appropriate short-circuit breaking and making capacity (see 3.7.14 and 3.7.15) is used as a neutral pole, then all poles, including the neutral pole, may operate substantially together.

The neutral pole may be fitted with an overcurrent release.

For equipment having a value of conventional thermal current (free air or enclosed, see 5.3.2.1 and 5.3.2.2) not exceeding 63 A, this value shall be identical for all poles.

For higher conventional thermal current values, the neutral pole may have a value of conventional thermal current different from that of the other poles, but not less than half that value or 63 A, whichever is the higher.

### E2 IEC 60947-6-1

E2-1 BS EN IEC 60947-6-1:2023 [reference 8] includes a clear, normative, requirement for the live conductor poles (lines and neutral) of multipole transfer switches to be mechanically coupled

#### **8.1.5 Opening and closing of main contacts**

The main moving contacts of all phase poles of the switching device of a multipole TSE shall be so mechanically coupled that they make and break substantially together, whether operated manually, remotely, or automatically.

The manual actuator of the TSE shall be insulated. The requirements of 8.1.5.1 of IEC 60947-1:2020 applies.

There shall be no path or opening which allows incandescent particles to be discharged from the area of the manual operating means.

For TSE equipped with neutral poles, 8.1.9 of IEC 60947-1:2020 applies.

For any TSE with manual operating means intended for on-load use, opening and closing of the main contacts shall be independent of the speed with which the manual operating means is operated.

If the manual means is intended only for off-load use with all sources de-energized and is so marked according to Table 2 item 1.3, this requirement does not apply.