

Draft Modification Report												
<h1 style="color: #e67e22;">GSR028: Making the SQSS Gender Neutral</h1> <p><b>Overview:</b> To remove any gender specific references or terminology within the Security and Quality of Supply Standards (SQSS). &amp; Make a minor housekeeping change to Table 6.4</p>	<h3>Modification process &amp; timetable</h3> <table border="1"> <tr> <td style="text-align: center;">1</td> <td><b>Proposal Form</b> 07 March 2022</td> </tr> <tr> <td style="text-align: center;">2</td> <td><b>Code Administrator Consultation</b> 28 March 2022 – 26 April 2022</td> </tr> <tr> <td style="text-align: center;">3</td> <td><b>Draft Modification Report</b> 03 May 2022</td> </tr> <tr> <td style="text-align: center;">4</td> <td><b>Final Modification Report</b> 16 May 2022</td> </tr> <tr> <td style="text-align: center;">5</td> <td><b>Implementation</b> In accordance with Ofgem timelines</td> </tr> </table>		1	<b>Proposal Form</b> 07 March 2022	2	<b>Code Administrator Consultation</b> 28 March 2022 – 26 April 2022	3	<b>Draft Modification Report</b> 03 May 2022	4	<b>Final Modification Report</b> 16 May 2022	5	<b>Implementation</b> In accordance with Ofgem timelines
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<p><b>Have 10 minutes?</b> Read the full <a href="#">Draft Modification Report</a></p> <p><b>Have 20 minutes?</b> Read the full Draft Modification Report and Annexes.</p>												
<p><b>Status summary:</b> This report has been submitted to the Panel for them to recommend whether this change should happen</p>												
<p><b>This modification is expected to have a:</b> <span style="color: green;">Low impact</span></p> <p>No parties should be impacted by these minor, non-material changes.</p>												
<p><b>Governance route:</b> Standard Governance modification to proceed to Code Administrator Consultation</p>												
<p><b>Who can I talk to about the change?</b></p>	<p><b>Proposer</b></p> <p>Shazia Akhtar</p> <p><a href="mailto:Shazia.Akhtar2@nationalgrideso.com">Shazia.Akhtar2@nationalgrideso.com</a></p> <p>Phone: 07787266972</p>	<p><b>Code Administrator Chair:</b></p> <p>Jennifer Groome</p> <p><a href="mailto:Jennifer.Groome@nationalgrideso.com">Jennifer.Groome@nationalgrideso.com</a></p> <p>Phone: 07966130854</p>										

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## What is the issue?

This modification is seeking to remove any gender specific references or terminology within the SQSS and make it Gender Neutral.

## Why change?

These changes will have a positive impact, as they will remove any gender bias, inequality, and discrimination within the SQSS. They will also acknowledge diversity and convey respect to all people. As well as aligning the SQSS to similar changes which have already taken place within the CUSC<sup>1</sup> and Grid Code<sup>2</sup>.

## What is the Proposer's solution?

The following change will be required to the SQSS along with one minor housekeeping alteration:

Current Term	Future Term	Parts of the standard impacted
His	Their	Paragraph 1.17 SQSS

### Housekeeping change:

#### GSR026:

As part of the implementation for GSR026<sup>3</sup>, the figure below in table 6.4 should have been revised from 1.0pu to 1.09pu.

Table 6.4 Steady State Voltage Limits and Targets in Operational Timescales

<b>(a) Voltage Limits on Transmission Networks</b>			
Nominal Voltage	PU Value (1pu relates to the Nominal Voltage)	Minimum (percentage of Nominal Voltage)	Maximum (percentage of Nominal Voltage)
Greater than 300kV	0.90pu-1.05pu	-10%	+5% <b>Note 7</b>
200kV up to and including 300kV	0.90pu-1.09pu	-10%	+9%
132kV up to and including 200kV	0.90pu-1.10pu	-10%	+10%
<b>(b) Voltage Limits at Interfaces to Distribution Networks and Non-Embedded Customers</b>			
Nominal Voltage			
132kV	0.90pu-1.10pu	-10%	+10%
At less than 132kV	0.94pu-1.06pu	-6%	+6%

<sup>1</sup> [CMP380: 'Making the CUSC Gender Neutral'](#)

<sup>2</sup> [GC0153: 'Making the Grid Code Gender Neutral'](#)

<sup>3</sup> [GSR026: 'Adding Non- Standard Voltages to the SQSS'](#)

## **Changes implemented to the Industry Governance Framework**

The following changes were also proposed to the Industry Governance Framework along with some minor typographical and formatting amendments. They were all approved by the SQSS Panel on 22 March 2022 and have been implemented on 28 March 2022. Please refer to Annex 3 of this consultation document for further information on these changes.

<b>Current Term</b>	<b>Future Term</b>	<b>Parts of the standard impacted</b>
Chair/Chairman	Chairperson	Industry Governance Framework
He	They	Industry Governance Framework
His	Their	Industry Governance Framework

SQSS objective 3.1 (iv) has also been amended to the following: “facilitate electricity Transmission Licensees to comply with any relevant obligations under EU law”.

And the link to the SQSS Modification Proposal form in the Industry Governance Framework has also been updated.

## **Final legal text**

The full legal text, with tracked changes can be found in Annex 2.

## **What is the impact of this change?**

<b>Proposer’s assessment against SQSS Objectives</b>	
<b>Relevant Objective</b>	<b>Identified impact</b>
(i) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;	<b>Neutral</b>
(ii) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;	<b>Neutral</b>
(iii) facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and	<b>Neutral</b>
(iv) facilitate electricity Transmission Licensees to comply with any relevant obligations under EU law.	<b>Neutral</b>

<b>Proposer’s assessment of the impact of the modification on the stakeholder / consumer benefit categories</b>	
<b>Stakeholder / consumer benefit categories</b>	<b>Identified impact</b>
Improved safety and reliability of the system	<b>Neutral</b>

Lower bills than would otherwise be the case	<b>Neutral</b>
Benefits for society as a whole	<b>Positive</b> By removing any gender bias, inequality, and discrimination within the standard and promoting equality and diversity.
Reduced environmental damage	<b>Neutral</b>
Improved quality of service	<b>Positive</b> This will promote efficiency in the implementation and administration of the SQSS arrangements, by removing any gender bias, inequality, and discrimination within the code and promoting equality and diversity.

### **Code Administrator consultation summary**

The Code Administrator Consultation was issued on the 28 March 2022 closed on 26 April 2022 and received 2 responses. A summary of the responses can be found in the table below, and the full responses can be found in Annex 4.

<b>Code Administrator Consultation summary</b>	
<b>Question</b>	
Do you believe that the GSR028 Original Proposal better facilitates the Applicable SQSS Objectives?	Both respondents agree, one commented: While we believe the Original solution is neutral against the SQSS Objectives, this change will ensure any gender bias, inequality and discrimination is removed from the Standards and promote equality and diversity.
Do you support the proposed implementation approach?	Both respondents agreed that Yes, they do support the proposed Implementation approach.
Do you have any other comments?	Only one comment which was that the proposal will ensure consistency with the Connection and Use of System Code (CUSC) modification (CMP380) and the Grid Code modification (GC0153)
<b>Legal text issues raised in the consultation</b>	
N/A	
<b>EBR issues raised in the consultation</b>	
N/A	

### **Panel recommendation vote**

The Panel met on the 11 May 2022 to carry out their recommendation vote. They assessed whether a change should be made to the SQSS by assessing the proposed change and any alternatives against the Applicable Objectives.

**Vote 1:** Does the Original facilitate the objectives better than the Baseline?

Panel Member: **Alan Creighton, DNO Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original					
Voting Statement					

Panel Member: **Simon Lord, Generation Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original					
Voting Statement					

Panel Member: **[Name], National Grid ESO Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original					
Voting Statement					

Panel Member: **[Name], NGET Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original					
Voting Statement					

Panel Member: **[Name], OFTO Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original					
Voting Statement					

Panel Member: **[Name], Scottish Hydro Electricity Transmission Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original					
Voting Statement					

Panel Member: **[Name], SP Transmission Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original					
Voting Statement					

**Vote 2 – Which option is the best?**

Panel Member	BEST Option?	Which objectives does this option better facilitate? (If baseline not applicable).
Alan Creighton		
Simon Lord		

**Panel conclusion**

The Panel, **unanimously/ by majority recommended** that the Proposer’s solution should be implemented.

**When will this change take place?**

**Implementation date**

Changes to the SQSS will need to be implemented in line with the Authority timeline. As the proposed changes are minor, it has been considered that the Authority may hold off from running a licence consultation. In the meantime, a draft version of the SQSS would be published on the ESO website with a covering note explaining the changes within it.

**Date decision required by**

As per Authority timeline.

**Implementation approach**

No systems or processes will need to be amended as a result of this proposal.

## Interactions

- |  |   |   |  |
|--|---|---|--|
| <input checked="" type="checkbox"/> Grid Code      | <input type="checkbox"/> BSC                    | <input checked="" type="checkbox"/> STC | <input checked="" type="checkbox"/> CUSC |
| <input type="checkbox"/> European<br>Network Codes | <input type="checkbox"/> Other<br>modifications | <input type="checkbox"/> Other          |  |

This Proposal is closely linked to the CUSC and Grid Code modifications CMP380 and GC0153 which have already been implemented to make the CUSC and Grid Code gender neutral. Further modifications to make similar changes to the STC/STCPs' were raised in March 2022.



## Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CMP	CUSC Modification Proposal
CUSC	Connection and Use of System Code
STC	System Operator Transmission Owner Code
STCPs'	System Operator Transmission Owner Code Procedures
SQSS	Security and Quality of Supply Standards

### Reference material

- [CMP380: 'Making the CUSC Gender Neutral'](#)
- [GC0153: 'Making the Grid Code Gender Neutral'](#)
- [GSR026: 'Adding Non- Standard Voltages to the SQSS'](#)

## Annexes

Annex	Information
Annex 1	Proposal form
Annex 2	Legal Text
Annex 3	Changes to the Industry Governance Framework (Already approved by SQSS Panel and implemented 28 March 2022)
Annex 4	Code Administrator Consultation Responses