

Final Modification Report

CM081: Making STC Gender Neutral

Overview: To remove any gender specific references or terminology within the System Operator Transmission Owner Code (STC).

&

Make some minor housekeeping changes to Section B.

Modification process & timetable



Have 5 minutes? Read our [Executive summary](#)

Have 20 minutes? Read the full [Final Modification Report](#)

Have 30 minutes? Read the full Final Modification Report and Annexes.

Status summary: The Panel has made their determination vote and an appeals window will open.

Panel recommendation: The Panel has determined unanimously that the Proposer's solution is implemented.

This modification is expected to have a: Low impact

No parties should be impacted by these minor, non-material changes.

Governance route This modification followed the Self-Governance route and proceeded straight to Code Administrator Consultation. The Panel has made the decision on whether it should be implemented

Who can I talk to about the change?

Proposer:
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Code Administrator Contact:
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Appeals window

If you want to appeal this decision, please send your [appeals form](#) and relevant documentary evidence to industrycodes@ofgem.gov.uk by 5pm on 24 June 2022 and ensure you copy in stcteam@nationalgrideso.com

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Executive summary

This modification is seeking to remove any gender specific references or terminology within the STC and make it Gender Neutral. A separate modification has also been raised in correlation to this for the STCPs'.¹

Why change?

These changes will have a positive impact, as they will remove any gender bias, inequality, and discrimination within the STC. They will also acknowledge diversity and convey respect to all people. As well as aligning the STC to similar changes which have already taken place within the CUSC² and Grid Code³.

What is the solution and when will it come into effect?

Proposer's solution: Proposer's solution

The following changes will be required to the STC along with some other minor typographical amendments.

Current Term	Future Term	Parts of the code impacted
Chair/Chairman	Chairperson	Section B
He	They	Sections B, H, J and Schedule 9
His	Their	Sections B, F, H, K and Schedule 9
Him/Himself	Them/Themselves	Sections B, F, H and Schedule 9

Note that following feedback on the CUSC modification CMP380 by the CUSC Panel on 26 November 2021. 'Chair' will be amended to 'Chairperson' to align the language with Standard Condition C14 1A(i) of the Transmission Licence.

Housekeeping changes:

Section B:

- Amend the purple font in the numbering of 7.1.7 to black font.
- Amend the incorrect numbering of 7.1.10A to 7.1.11 and 7.1.12.

Implementation date: This modification will be implemented 5 working days after the appeals window closes on 1 July 2022, providing no objections have been raised.

Panel recommendation/determination: The Panel has recommended/determined unanimously/by majority that the Proposer's solution is implemented

What is the impact if this change is made?

By removing any gender bias, inequality, and discrimination within the standard and promoting equality and diversity.

¹ [PM0123: "Making the STCPs' Gender Neutral"](#)

² [CMP380: 'Making the CUSC Gender Neutral'](#)

³ [GC0153: 'Making the Grid Code Gender Neutral'](#)

Interactions

- | | | | |
|--|---|--|--|
| <input checked="" type="checkbox"/> Grid Code | <input type="checkbox"/> BSC | <input checked="" type="checkbox"/> CUSC | <input checked="" type="checkbox"/> SQSS |
| <input type="checkbox"/> European
Network Codes | <input type="checkbox"/> Other
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. A further modification to make similar changes to the SQSS was also raised in March 2022⁴.

⁴ [GSR028: "Making the SQSS Gender Neutral"](#)

What is the issue?

This modification is seeking to remove any gender specific references or terminology within the STC and make it Gender Neutral. A separate modification has also been raised in correlation to this for the STCPs'.⁵

Why change?

These changes will have a positive impact, as they will remove any gender bias, inequality, and discrimination within the STC. They will also acknowledge diversity and convey respect to all people. As well as aligning the STC to similar changes which have already taken place within the CUSC⁶ and Grid Code⁷.

What is the solution?

Proposer's solution

The following changes will be required to the STC along with some other minor typographical amendments.

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Housekeeping changes:

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Legal text

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

What is the impact of this change?

By removing any gender bias, inequality, and discrimination within the standard and promoting equality and diversity.

Proposer's assessment against the Applicable Objectives

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

⁵ PM0123: "Making the STCPs' Gender Neutral"

⁶ CMP380: 'Making the CUSC Gender Neutral'

⁷ GC0153: 'Making the Grid Code Gender Neutral'

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Negative
Lower bills than would otherwise be the case	Neutral
Benefits for society as a whole	Positive By removing any gender bias, inequality, and discrimination within the standard and promoting equality and diversity.
Reduced environmental damage	Neutral
Improved quality of service	Positive By removing any gender bias, inequality, and discrimination within the standard and promoting equality and diversity.

Code Administrator consultation summary

The Code Administrator Consultation was issued on the 6 April 2022 closed on 28 April 2022 and received one responses including no late responses. A summary of the response can be found in the table below, and the full responses can be found in Annex 3.

Code Administrator Consultation summary	
Question	
Do you believe that the CM081 Original Proposal better facilitates the Applicable CUSC Objectives?	Yes. NGESO agrees with the proposer's view that this modification will promote equality and diversity by removing any gender bias, inequality and discrimination within the code. NGESO also agrees with justification applied to objective (e) within the consultation.
Do you support the proposed implementation approach?	Yes.
Do you have any other comments?	This proposal will ensure consistency with the other Codes that are administered by NGESO (CUSC, Grid Code and SQSS)
Legal text issues raised in the consultation	
None	

Panel recommendation/determination vote

The Panel met on the 25 May 2022 to carry out their determination vote.

They assessed whether a change should be made to the STC 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: **Robert Wilson, (Nationalgrid ESO)**

	Better facilitate s AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Better facilitates AO (f)?	Better facilitates AO (g)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Neutral	Neutral	Yes
Voting Statement								
		This is a very minor modification but is important in updating the language used in the code.						

Panel Member: **Neil Bennett, (SHET)**

	Better facilitate s AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Better facilitates AO (f)?	Better facilitates AO (g)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Neutral	Neutral	Yes
Voting Statement								
		SHET agrees with the proposal to amend the gender language within the STC to remove any gender bias						

Panel Member: **Milorad Dobrijevic (SPT)**

	Better facilitate s AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Better facilitates AO (f)?	Better facilitates AO (g)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Neutral	Neutral	Yes
Voting Statement								
		This modification will have very little impact on the technical or operational content of the codes but will align the language with the changes that have been made to the other codes. SPT are therefore agreeable to the changes.						

Panel Member: **Mike Lee, (OFTO)**

	Better facilitate s AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Better facilitates AO (f)?	Better facilitates AO (g)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Neutral	Neutral	Yes
Voting Statement								
		This modification will have no impact on the technical or operational content of the codes but will align the language with the changes that have been made to the other codes. The basis that the changes are at worst neutral then the OFTOs support the proposals.						

Panel Member: **Richard Woodward (NGET)**

	Better facilitate s AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Better facilitates AO (f)?	Better facilitates AO (g)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes	Neutral	Yes
Voting Statement								
		This modification aims to improve inclusion in the electricity sector through removal of unconscious bias in code text. The proposal also ensures alignment of the STC to other transmission code frameworks which have already adopted the change.						

Vote 2 – Which option is the best?

Panel Member	BEST Option?	Which objectives does this option better facilitate? (If baseline not applicable).
Robert Wilson	Original	E
Neil Bennett	Original	E
Milorad Dobrijevic	Original	E
Mike Lee	Original	E
Richard Woodward	Original	E, F

Panel conclusion

The Panel unanimously determined that the Proposer's solution should be implemented.

When will this change take place?**Implementation date**

This modification will be implemented 5 working days after the appeals window closes on 1 July 2022, providing no objections have been raised.

Date decision required by

25 May 2022

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"/> CUSC | <input checked="" type="checkbox"/> SQSS |
| <input type="checkbox"/> European Network Codes | <input type="checkbox"/> Other 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. A further modification to make similar changes to the SQSS was also raised in March 2022⁸.

⁸ [GSR028: "Making the SQSS Gender Neutral"](#)

Acronyms, key terms and reference material

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

Reference material

- [CMP380: 'Making the CUSC Gender Neutral'](#)
- [GC0153: 'Making the Grid Code Gender Neutral'](#)
- [GSR028: "Making the SQSS Gender Neutral"](#)
- [PM0123: "Making the STCPs' Gender Neutral"](#)

Annexes

Annex	Information
Annex 1	Proposal form
Annex 2	Legal Text
Annex 3	Code Administrator Consultation response
Annex 4	Self-governance Statement