

Final Self-Governance Modification Report

GC0153: Making the Grid Code Gender Neutral

Overview: To remove any gender specific references or terminology within the Grid Code.

Modification process & timetable

Proposal Form

10 November 2021

Code Administrator Consultation

29 November 2021 - 29 December 2021

Draft SG Modification Report

3 19 January 2022

2

4

Final SG Modification Report 01 February 2022

Appeals Window

5 02 March 2022

Implementation

6 09 March 2022

Status summary: The Panel has made their determination and an appeals window has opened.

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

This modification is expected to have a: Low impact

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

Modification drivers: Cross-code change/Harmonisation (By removing any gender bias, inequality, and discrimination across the codes)

Governance route	Self-Governance modification to proceed to Code Administrator Consultation					
Who can I talk to about the change?	Proposer: Code Administrator Chair:					
	Shazia Akhtar Nisar Ahmed					
	Shazia.Akhtar2@nationalgrideso.c Nisar.Ahmed@nationalgrideso.					
	<u>om</u> <u>com</u>					
	07787266972 07773043068					
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 02 March 2022 and					
	ensure you copy in grid.code@nation	onalgrideso.com				



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What is the issue?

This modification is seeking to remove any gender specific references or terminology within the Grid Code 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 Grid Code. They will also acknowledge diversity and convey respect to all people.

What is the solution?

Proposer's solution

The following changes will be required to the Grid Code (along with some other minor typographical amendments):

Current Term	Future Term	Parts of the code impacted
Chairman	Chair	Glossary & Definitions, Operating Code 12, Governance Rules
He	They	Glossary & Definitions, Operating Code 8A, Operating Code 8B, Operating Code 12, Governance Rules
His	Their	Glossary & Definitions, Connection Conditions, European Connection Conditions, Operating Code 6, Operating Code 8A, Operating Code 8B, Governance Rules
Him	Them	Governance Rules
Manned	Staffed	Connection Conditions, European Connection Conditions, Balancing Code 2

Note that following feedback at the CUSC Panel on 26 November 2021, we will change "Chair" to "Chairperson" to align language with Standard Condition C14 1A(i) of the <u>Transmission Licence</u>. This has been highlighted as tracked changes in the draft legal text.

Legal text

The full draft legal text, with tracked changes can be found in Annex 3.

What is the impact of this change?

Proposer's assessment against the Applicable Objectives

Proposer's assessment against Grid Code Objectives	
Relevant Objective	Identified impact
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;	Neutral
(b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	Neutral



(c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;	Neutral
(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and	Neutral
administration of the Grid Code arrangements	Positive By removing any gender bias, inequality, and discrimination within the code and promoting equality and diversity.

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories						
Stakeholder / consumer benefit categories	Identified impact					
Improved safety and reliability of the system	Neutral					
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 code and promoting equality and diversity.					
Reduced environmental damage	Neutral					
Improved quality of service	Positive 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 03 December 2021 closed on 07 January and received 1 response from the ESO which is summarised in table below and available in Annex 4.

Code Administrator Consultation summary
Question



Grid Code Objectives?	Yes, the Original Proposal better supports objective e of the Grid Code Objectives. The Original Proposal will achieve this by removing any gender bias, inequality and discrimination within the code and promote
Do you support the proposed implementation approach?	equality and diversity. Yes
Do you have any other comments?	The proposal will ensure consistency with the Connection and Use of System Code (CUSC) modification as modified by CMP380.

Panel determination vote

The Panel met on 27 January 2022 to carry out their determination vote.

They assessed whether a change should be made to the Grid Code by assessing the proposed change against the Applicable Objectives.

Vote 1: Does the Original, facilitate the objectives better than the Baseline? Panel Member: Alan Creighton: Network Operator Representative

i and ividi	and Member. Alan Oreignton: Network Operator Representative							
	Better	Better	Better	Better	Better	Overall		
	facilitates	facilitates	facilitates	facilitates AO	facilitates	(Y/N)		
	AO (a)?	AO (b)?	AO (c)?	(d)?	AO (e)?			
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes		
Voting Sta	atement							
Making th	e Grid Code	gender neutral	addresses any	y inequality or c	discriminator	ry issues.		

Vote 1: Does the Original, facilitate the objectives better than the Baseline? Panel Member: **Alastair Frew: Generator**

	and mornion reaction contains								
	Better	Better	Better	Better	Better	Overall			
	facilitates	facilitates	facilitates	facilitates AO	facilitates	(Y/N)			
	AO (a)?	AO (b)?	AO (c)?	(d)?	AO (e)?				
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes			
Voting Sta	atement								
Improves	Improves equality in code drafting.								

Vote 1: Does the Original, facilitate the objectives better than the Baseline? Panel Member: **Christopher Smith: Offshore Transmission Licensee**

	Better facilitates AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Overall (Y/N)		
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes		
Voting Sta	atement							
A much o	A much overdue modification.							



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

Panel Member: Guy Nicholson: Generator

	Better facilitates AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Overall (Y/N)
Original	Yes	Yes	Yes	Yes	Yes	Yes
Voting Sta	atement					

This change is very welcome and I support it wholeheartedly. Having language that appears to exclude about half the population is not acceptable. As an industry we all should have addressed this before. I commend NGESO for leading this modification.

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

Panel Member: John Harrower: Generator

	Better facilitates AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes
Voting Statement						
This modification is consistent with promoting equality and diversity.						

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

Panel Member: Rob Wilson: National Grid ESO

	Better facilitates AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes
Voting Statement						
This modi	This modification updates the language of the Grid Code and is long overdue.					

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

Panel Member: Robert Longden: Supplier

	Better	Better	Better	Better	Better	Overall
	facilitates	facilitates	facilitates	facilitates AO	facilitates	(Y/N)
	AO (a)?	AO (b)?	AO (c)?	(d)?	AO (e)?	
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes
Voting Sta	atement					
Making th	ne Grid Code	gender neutral	addresses an	y inequality or o	discriminato	ry
issues.						

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

Panel Member: Roddy Wilson: Onshore Transmission Licensee

	Better facilitates AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes
Voting Sta	atement					



The original proposal is welcomed and supported as it promotes equality and diversity by removing any gender bias from the code.

Vote 1: Does the Original, facilitate the objectives better than the Baseline? Panel Member: **lain Dallas (on behalf of Sigrid Bolik): Generator**

		<u> </u>		<u>, </u>		
	Better	Better	Better	Better	Better	Overall
	facilitates	facilitates	facilitates	facilitates AO	facilitates	(Y/N)
	AO (a)?	AO (b)?	AO (c)?	(d)?	AO (e)?	
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes
Voting Sta	Voting Statement					
Making the Grid Code gender neutral addresses any inequality or discriminatory						
issues.			-			

Vote 1: Does the Original, facilitate the objectives better than the Baseline? Panel Member: **Graeme Vincent (on behalf of Steve Cox): Network Operator Representative**

	Better facilitates AO (a)?	Better facilitates AO (b)?	Better facilitates AO (c)?	Better facilitates AO (d)?	Better facilitates AO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes
Supportive of the modification as it removes gender bias within the Code, thereby making the language used within the code more inclusive.						

Vote 2 - Which option is the best?

Panel Member	BEST Option?	Which objectives does this option better facilitate? (If baseline not applicable).
Alan Creighton	Original	(d)
Alastair Frew	Original	(d)
Christopher Smith	Original	(d)
Guy Nicholson	Original	(a), (b), (c), (d)
John Harrower	Original	(d)
Rob Wilson	Original	(d)
Robert Longden	Original	(d)
Roddy Wilson	Original	(d)
lain Dallas (Alternate for Sigrid Bolik)	Original	(d)
Graeme Vincent (Alternate for Steve Cox)	Original	(d)

Panel conclusion

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



When will this change take place?

Implementation date

9 March 2022.

This modification will be implemented 5 working days after the appeals window closes (5pm on 2 March 2022), providing no objections have been raised.

Date decision required by

Self-governance modification and Panel have made their determination.

Implementation approach

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

Interactions			
⊠Grid Code	□BSC	⊠STC	⊠SQSS
□European	□ EBR Article 18	□Other	□Other
Network Codes	T&Cs¹	modifications	⊠CUSC

This Proposal is closely linked to <u>CMP380</u>, which will make the CUSC gender neutral. Further modifications to make similar changes to the STC and SQSS will also be raised in early 2022.

¹ If the modification has an impact on Article 18 T&Cs, it will need to follow the process set out in Article 18 of the European Electricity Balancing Guideline (EBGL – EU Regulation 2017/2195) – the main aspect of this is that the modification will need to be consulted on for 1 month in the Code Administrator Consultation phase. N.B. This will also satisfy the requirements of the NCER process.



Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
EBR	Electricity Balancing Regulation
GC	Grid Code
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
T&Cs	Terms and Conditions

Reference material

None

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Annex	Information
Annex 1	Proposal Form
Annex 2	Self-Governance Statement
Annex 3	Legal Text
Annex 4	Code Administrator Consultation Response