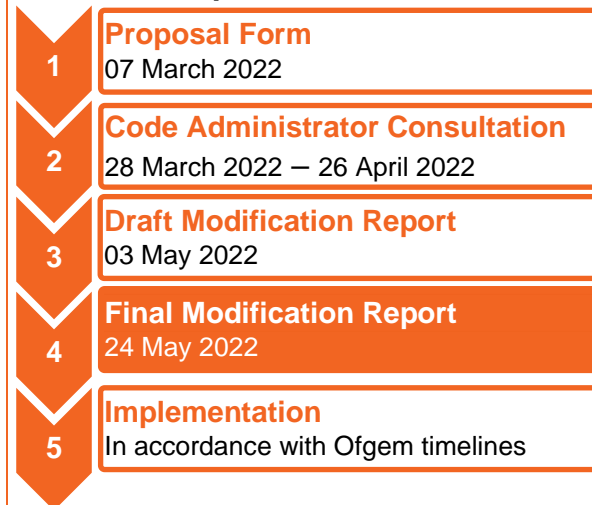


Final Modification Report

GSR028: Making the SQSS Gender Neutral

Overview: To remove any gender specific references or terminology within the Security and Quality of Supply Standards (SQSS).
&
Make a minor housekeeping change to Table 6.4.

Modification process & timetable



Have 10 minutes? Read the full Final [Modification Report](#)

Have 20 minutes? Read the full Final Modification Report and Annexes.

Status summary: This report has been submitted to the Authority for them to decide whether this change should happen.

Panel recommendation: The Panel has recommended 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: Standard Governance modification to proceed to Code Administrator Consultation.

Who can I talk to about the change?	<p>Proposer</p> <p>Shazia Akhtar</p> <p>Shazia.Akhtar2@nationalgrideso.com</p> <p>Phone: 07787266972</p>	<p>Code Administrator Chair:</p> <p>Jennifer Groome</p> <p>Jennifer.Groome@nationalgrideso.com</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 CUSC¹ and Grid Code².

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 GSR026³, 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

(a) Voltage Limits on Transmission Networks			
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% Note 7
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) Voltage Limits at Interfaces to Distribution Networks and Non-Embedded Customers			
Nominal Voltage			
132kV	0.90pu-1.10pu	-10%	+10%
At less than 132kV	0.94pu-1.06pu	-6%	+6%

¹ [CMP380: 'Making the CUSC Gender Neutral'](#)

² [GC0153: 'Making the Grid Code Gender Neutral'](#)

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

Changes implemented to the Industry Governance Framework

The following changes were also proposed to the National Electricity System Security and Quality of Supply Standard (NETTS SQSS) 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.

Current Term	Future Term	Parts of the standard impacted
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”.

Previously, this read “facilitate electricity Transmission Licensees to comply with their obligations under EU law”.

And the link to the SQSS Modification Proposal form in the Industry Governance Framework has also been updated so that it links through to the page where the form is available to download.

Final legal text

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

What is the impact of this change?

Proposer’s assessment against SQSS Objectives	
Relevant Objective	Identified impact
(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;	Neutral
(ii) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;	Neutral
(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	Neutral
(iv) facilitate electricity Transmission Licensees to comply with any relevant obligations under EU law.	Neutral

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 standard and promoting equality and diversity.
Reduced environmental damage	Neutral
Improved quality of service	Positive 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.

Code Administrator Consultation summary

Question	
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 (CUSEC) modification (CMP380) and the Grid Code modification (GC0153)
Legal text issues raised in the consultation	
N/A	
Electricity Balancing Regulation issues raised in the consultation	
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	Neutral	Neutral	Neutral	Neutral	Yes
Voting Statement					
These proposed changes will have a positive overall impact, as they will remove any gender bias, inequality, and discrimination within the SQSS.					

Panel Member: **Garth Graham, Generation Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Neutral	Yes
Voting Statement					
This modification is a minor but important updating of the language used in the SQSS.					

Panel Member: **Rob Wilson, National Grid ESO Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Neutral	Yes
Voting Statement					
This modification is a minor but important updating of the language used in the SQSS.					

Panel Member: **Le Fu, NGET Representative**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes
Voting Statement					
This modification is a minor but important updating of the language used in the SQSS.					

Panel Member: David Lyon, OFTO Representative

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes
Voting Statement					
This modification is a minor but important updating of the language used in the SQSS.					

Panel Member: Roddy Wilson, 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	Neutral	Neutral	Neutral	Neutral	Yes
Voting Statement					
The proposed modification to the SQSS is supported as it promotes equality and diversity by removing any gender bias from the standard.					

Panel Member: Cornel Brozio, SP Transmission Representative

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes
Voting Statement					
Removing gender bias, inequality or discrimination from the SQSS has a positive impact.					

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	-
Garth Graham	Original	(i)
Le Fu	Original	-
Rob Wilson	Original	(i)
David Lyon	Original	-
Roddy Wilson	Original	-
Cornel Brozio	Original	-

Panel conclusion

The Panel unanimously 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

SQSS Panel vote to take place on 11 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"/> STC | <input checked="" type="checkbox"/> CUSC |
| <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. Further modifications to make similar changes to the STC/STCPs' will also be 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