

Modification proposal:	GSR028: Making the SQSS Gender Neutral		
Decision:	The Authority ¹ approves ² the proposed changes to the National Electricity Transmission System Security and Quality of Supply Standards (SQSS)		
Target audience:	National Grid Electricity System Operator (NGESO), transmission licensees and other interested parties		
Date of publication:	26 August 2022	Implementation date:	TBC

Background

The SQSS sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). The SQSS Panel is responsible for keeping the SQSS under review and submitting any proposed changes to us for a decision.

In March 2022, the Code Administrator³ implemented modifications to the Connection and Use of System Code⁴ (CUSC), Grid Code⁵ and National Electricity Transmission System (NETS) Security and Quality of Supply Standard (SQSS) Industry Governance Framework⁶ to remove any gender specific references or terminology; thus making them gender neutral. GSR028 proposes similar changes to the NETS SQSS to align it with the CUSC, Grid Code and NETS SQSS Industry Governance Framework.

GSR028 also proposes a minor housekeeping change to Table 6.4 (Steady State Voltage Limits and Targets in Operational Timescales) of the NETS SQSS that was approved under GSR026⁷, but not reflected in the updated version of the SQSS in error.

¹ References to the “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day to day work. This decision is made by or on behalf of GEMA.

² This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.

³ National Grid ESO is the administrator for the CUSC, Grid Code, and SQSS.

⁴ [CMP380: 'Making the CUSC Gender Neutral' | National Grid ESO](#)

⁵ <https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0153-making-grid-code-gender-neutral>

⁶ NETS SQSS Industry Governance Framework: [SQSS Code Documents | National Grid ESO](#)

⁷ [GSR026: Adding Non- Standard Voltages to the SQSS | National Grid ESO](#)

The modification proposal

GSR028 is proposed by NG ESO and seeks to change the term 'his' in Paragraph 1.17 of the NETS SQSS to 'their'. The proposed change seeks to remove gender bias, inequality, and gender discrimination from within the NETS SQSS.

In addition, it proposes a minor housekeeping alteration to revise a value from '1.0pu' to '1.09pu' as shown below in Figure 1. This alteration should have been made as part of the implementation for GSR026.

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%

Figure 1: Table 6.4 Steady State Voltage Limits and Targets in Operational Timescales

Industry Consultation

A Code Administrator Consultation was held from 28 March 2022 to 26 April 2022 receiving two responses. Both respondents were supportive of the proposed changes and implementation approach.

One of the respondents had no further comments whereas the other commented that whilst they believe the original solution is neutral against the NETS SQSS Objectives, this change will ensure any gender bias, inequality and discrimination is removed from the NETS SQSS and promote equality and diversity. They also stated that the proposed changes will ensure consistency with the CUSC modification (CMP380) and the Grid Code modification (GC0153).

NETS SQSS Panel recommendation

The NETS SQSS Panel met on 11 May 2022 to carry out their recommendation vote. The NETS SQSS Panel unanimously recommended that the Proposer's solution should be implemented.

Two members considered GSR028 to better facilitate SQSS Objective (i), and five considered it to have a neutral impact on SQSS Objective (i). All seven members considered the proposed changes to have a neutral impact on the SQSS Objectives (ii), (iii) and (iv).

Our decision

We have considered the issues raised by the modification proposal, including taking into account the responses to the consultation. We have also considered and taken into account the votes of the NETS SQSS Panel. We have concluded that:

- Implementation of the GSR028 modification proposal has a positive impact on the NETS SQSS Objective (i) and a neutral impact on the NETS SQSS Objectives (ii), (iii) and (iv) and is approved and
- approving the modification is consistent with our principal objective and statutory duties.⁸

Reasons for our decision

We consider the GSR028 modification to have a positive impact on the NETS SQSS Objective (i) and a neutral impact on the NETS SQSS Objectives (ii), (iii) and (iv).

Although we have considered removal of gender biased language from the NETS SQSS to have a neutral impact against the NETS SQSS Objectives, it promotes equality, diversity and inclusion in industry and should be approved.

(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;

The housekeeping alteration proposed herein was approved under GSR026, but not reflected in the updated version of the SQSS in error. Correcting this error ensures that equipment connected at any such nominal voltage meets the appropriate requirements. We therefore consider that this amendment will better facilitate this SQSS objective.

⁸ The Authority's statutory duties are wider than matters which NGET must take into consideration and are detailed mainly in the Electricity Act 1989 as amended.

Implementation

In this letter we have set out our decision to approve the changes to the NETS SQSS proposed in GSR028. We understand that, given the minor nature of the changes arising from GSR028, NGENSO intend to publish a draft version of the SQSS on their website with a cover note explaining the changes within it. An updated version of the SQSS will incorporate these changes in due course. When an updated version is formalised, the Authority will hold a licence consultation to reflect the updated version of the SQSS in the Electricity Transmission Licence.

Decision notice

The Authority hereby directs that modification proposal GSR028 be made.

Martin Queen

Head of Engineering Systems & Policy - Analysis & Assurance

Signed for and on behalf of the Authority