

4.3 CP Form

Change Proposal – BSCP40/02	CP No: CP1580 <i>Version No:</i> <i>(mandatory by BSCCo)</i>
Title (mandatory by originator) Making the Code Subsidiary Documents (CSDs) gender neutral.	
Description of Problem/Issue (mandatory by originator) The current versions of the Balancing and Settlement Code (BSC) CSDs contain 198 cases of gendered pronouns across 39 documents, such as “he, his, or him” There is a disparity between the Code’s supporting documents and the present-day norm for legal drafting, which involves employing gender-neutral language and references. There are inconsistencies within BSCP602 which have been implemented from P419 but were unintentionally missed when updating the specific documentation. This CP aims to correct the inconsistencies in reference to P419 with minor housekeeping corrections.	
Proposed Solution (mandatory by originator) The proposal suggests modifying all references that pertain to a particular gender to gender-neutral ones. The following techniques will be applied based on the context while revising such gender-specific references: He → They, Him → Them, His/Her → Their, Manned → Operated, Chairman → Chair, Man → Person or Operated, Men → People For BSCP602, the solution at present is to implement the housekeeping to remove the inconsistent references that relate to P419. As these are non-material changes that we do not expect to impact any BSC Parties or users of these documents, this change could be made via a housekeeping Change Proposal.	
Justification for Change (mandatory by originator)	

There are a total of 204 instances amongst the CSDs where gender-specific pronouns are used. It is necessary to make a change because there is a discrepancy between the Code's supporting documents and the current accepted practice for legal writing, which advocates for the use of gender-neutral language and references. By rendering the CSDs gender-neutral, it will eliminate gender-based prejudice and disparity present in the Code's supporting documents.

Using masculine gendered pronouns in regulatory text excludes and marginalizes individuals who do not identify as male and reinforces the idea that the industry is designed primarily for men. This needs to change in order to promote gender equality and ensure that all individuals are equally valued.

The use of masculine gendered pronouns in such text is a pervasive and longstanding issue that has been recognized by legal scholars and activists as a barrier to gender equality. Legal documents that use masculine pronouns such as "he" or "him" to refer to both men and women create a perception that the law is designed for men, and individuals that do not identify as men are secondary. This reinforces harmful gender stereotypes and can contribute to discrimination.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? (mandatory by originator)

Section F

Estimated Implementation Costs (mandatory by BSCCo)

Costs are expected to be under £7K to make the required document changes.

BSC Configurable Items Affected by Proposed Solution(s) (mandatory by originator)

Codes of Practice (COP) 4, 8 and 11
 NETA Interface Definition and Design (IDD): Part 1
 BSC Procedures (BSCP) 3, 6, 11, 14, 18, 20, 32, 65, 201, 502, 504, 505, 516, 536, 537, 538, 550 and 602

Half Hourly Instruction Processing Specification,
 Multiple BM Unit Instruction Processing Specification,
 NHH Instruction Processing Specification,
 SVA Data Catalogue Volume 2.

Supplier Volume Allocation Agency.

BSC Change Process Guidance Note,
 Determination of Trading Disputes by the BSC Panel,
 Determining Trading Party Groups,
 EFR and EFR Escalation Process,
 Operational Information Document,
 Registration of BM Units for EMR
 Panel Elections General Guidance,
 Party Attendance at the Trading Disputes Committee,
 Securing Access for Technical Assurance Agent (TAA) Inspection Visits,
 TAA Working Instructions,
 Technical Assurance of Metering How to rectify common non-compliances,
 The Balancing and Settlement Code (BSC) Arrangements,
 UMS Charge Code Form Signals and Miscellaneous.

Impact on Core Industry Documents or System Operator-Transmission Owner Code
 (mandatory by originator)

None

Related Changes and/or BSC Releases (mandatory by BSCTCo)

[P450 'Housekeeping and making the BSC gender neutral'](#)

Requested Implementation Date (mandatory by originator)

29th June 2023

Reason: A relatively easy change which could skip CPC Consultation

Version History (mandatory by BSCTCo) v 1.0

Originator's Details:

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Date: 21 March 2023
Attachments: N (If Yes, No. of Pages attached:) (delete as appropriate)

4.4. CP Form Guidelines

These guidelines are to be used to assist in the completion of the CP Form, given in Appendix 4.3. The guidelines state who should complete each item on the form and whether it is mandatory or optional. They also give a brief description of the information that should be given for each item. For further guidance please contact your BCA/PACA.

- **Title** – mandatory completion by originator – title of CP.
- **CP No.** – mandatory completion by BSCCo – unique number allocated for each individual CP.
- **Version No.** – mandatory completion by originator – when first submitted by the originator, the CP should have a version number of v0.1. Following discussions with BSCCo, any changes required following those discussions, the CP should be updated to v1.0. Should any further amendments/additions/deletions be required to the CP during its lifecycle, the version number should be updated to v2.0, v3.0, etc.
- **Description of Problem/Issues** - mandatory completion by originator - a statement of the issue/problem.
- **Proposed Solution(s)** – mandatory completion by originator – this is a single fully defined description of the proposed solution. For Category 1 BSC Configurable Items redlined changes must be included.
- **Justification for Change** – mandatory completion by originator – details of the business case for implementing the proposed change. This section should also include a brief assessment of the risk associated with leaving the problem/issue unresolved, in terms of materiality and probability of occurrence.
- **To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code?** – All CPs should be raised in line with BSC section F 3.1.2 ensuring that changes to BSC Configurable Items should continue to facilitate the provisions as detailed in the Code and should not impose new obligations or restrictions of a material nature on Parties and Party Agents (or classes thereof) which are not authorised or envisaged by, or subsidiary to, the rights and obligations of the Parties under the Code. As such the originator should highlight the section of the BSC that their

proposed change is derived from and if the proposed CP facilitates the existing arrangements in the BSC.

- **Estimated Implementation Costs** – mandatory by BSCCo – These will be broken down into Central System Costs and BSCCo Operational Costs where appropriate.
- **Impact on BSC Configurable Item(s)** – mandatory completion by originator – a list of all BSC Configurable Items potentially affected by proposed solution. Details of how each BSC Configurable Item will be affected should be included, if known, and redlining of Category 1 BSC Configurable Items must be completed.
- **Impact on Core Industry Documents or System Operator – Transmission Owner Code** – mandatory completion by originator, however, BSCCo can advise if originator is unsure of all the impacts on documents – list of all documents potentially affected by proposed solution. These documents include any changes that will be needed to the DTC or other MRASCo Products. Details of how each document will be affected will also need to be included.
- **Requested Implementation Date and Associated Reasons** – mandatory by originator – identification of any critical milestone date(s) which need to be considered when generating possible solutions, with reasons for these. If change can be implemented at any time i.e. with no time constraints, this should be stated. This will be updated to the agreed Implementation Date once the Panel Committee has voted.
- **Version History** – mandatory completion by BSCCo – details of any previous versions of a Draft CP or details of what has changed between CP versions. If this is the first version then this will be indicated in this section.
- **Originator's Details** – mandatory by originator – the name, organisation, email address and telephone number of the originator and the date on which the originator raised the CP.