

SQSS GSR033 Comments not addressed as part of this Mod due to time and scope limitations, and to be picked up in separate Modification.

Source	SQSS Section	Comment
Northern Powergrid (Alan Creighton)	General (starting in 1.1)	Defined terms (e.g. Transmission Licences" should not be capitalised).
	1.3	Change "document" to "standard", for consistency with the rest of the SQSS.
	1.5	The BCA with DNOs is with NESO not the TOs, so this notification should be sent specifically by the ISOP not the transmission licensees more generally
	1.24.1	Consistent capitalisation of defined term (ESO Licence).
	1.24.2	By definition the ISOP is a Transmission Licensee - so do NESO also need to note that the ISOP is not required to comply etc?
	1.24.3	Including the NESO itself as a transmission licensee?
	1.24.6	Check that this works given that NESO is a Transmission Licensee (as defined)
	1.25.6	I suspect there are other instances where a term that means ‘ a transmission licensee other than the ISOP’ would be useful.
	2.3.2	Review alignment - multiple instances in this section
	2.8.2	Check indent - multiple instances
	2.11	Check indent - this needs reviewing throughout the document so I’ll not mention it again.
	Table 3.1, Row D	Check formatting
	Table 3.1, Row E	Check formatting
	Table 3.2	Spacing of rows etc not consistent with Table 3.1
	11	There are many places where existing and new defined terms are not italicised in the legal text.
	11 - Assimilated Law	Check margins
	11 - ESO Licence	This isn’t a consistent reference to the Act as that in the definition of a Distribution Licensee
	11 - Information request notice	What’s a relevant party? The legal text states that a notice can be issued to transmission licensees (other than NESO).
	11 - Information request statement	What’s a relevant party? The legal text states that a notice can be issued to transmission licensees (other than NESO).
	11 - Insufficient Voltage Performance Margins, A.1	Is this correct ["Under any of the following conditions"]?
	11 - Transmission Licence	Check consistency with Distribution Licence reference to the Act.
	11 - Transmission Licensee	Is this materially different to that of the new definition ‘Licensee’?
		Do these definitions and their use in the SQSS all work properly?
		Need to consider that the text refers to NESO as a Transmission Licensee when it has an ESO licence rather than a transmission licence - potential to cause confusion.
	Appendix B.1	General comments about indenting, formatting etc.
	Appendix D.1	Different fonts in the parags
	G.2	[Heading] font
	H.18	Check indents etc - multiple instances
	J1.1 Interpretations	Came from the SQSS Governance Framework. Consider whether these should be moved elsewhere in the main SQSS.
	J2.1	Is this really needed?
	J2.6	Is it clear what this means ["to reflect upon the powers and decisions of the Authority"]
	J3.1	But by definition the ISOP is a Transmission Licensee - so if we’re retaining the definitions, the second part of this paragraph is not required.
	J3.1	These are the SQSS objectives, but not the TOs licence which are slightly different than those of the ESO licence
	J4.1.1	Can I just confirm that all 4 of these parties have a licence obligation to jointly establish a Panel.
		If so have they all made a conscious decision for NESO to be the ‘Code Administrator’ eg to provide a Panel Secretary.
	J4.6.6.1	[Alternate] Not a defined term - lower case ‘a;
	J4.6.8.2	Note that OFTOs are treated differently
	J4.9.1	[Quorum] Lower case q - not a defined term
	J5.2.2.1.A	[Modification Proposal] Not a defined term - several instances. I’ll not mention it again as there are many instances when terms are capitalised as though they are defined terms or proper nouns, but aren't.’
	J.5.2.1.4 (c)	This method of defining terms isn’t really consistent with the SQSS itself.
	J.5.2.1.5	I’ve not read any more of this document but scanning through it looks like there are similar editorial aspects to those in the earlier part of this document.
NESO (Bieshoy Awad)	J5.2.5.3	Suggest to remove this sentence ["Each Licensee member will individually send..."], as there should be one version of the SQSS for everyone.
	J5.2.5.4	This sentence ["Those Licnesees members that..."] should be removed, and a new paragraph written to reflect that the Authority will decide if the Modification to the SQSS will be approved.
	J5.2.6.4	Alter "implementation of licence changes" to “the approval of the Modification,”
NESO (Claire Newton)	Table 6.3	Change Distribution Network Operator to <i>network operator</i> .
	General	For the term "Authority" there is a mix in the document of capitalised and lower case - needs review.