#### **UNC Modification**

## At what stage is this document in the process?

# UNC 0741<u>S</u>:

# Updating specific gender references to neutral terms



#### **Purpose of Modification:**

This Modification is being raised to update any specific gender references such as 'he', 'him', 'his', 'her', 'Chairman' etc to neutral terms such as 'their', 'them', 'they' and 'Chairperson' in the Uniform Network Code.



The Proposer recommends that this Modification should be:

- subject to self-governance
- · assessed by a Workgroup.

This Modification will be presented by the Proposer to the Panel on 19 November 2020. The Panel will consider the Proposer's recommendation and determine the appropriate route.



High Impact:

None



Medium Impact:

None



Low Impact:

Transporters, IGTs and Shippers

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<b>Timetable</b>	е

#### The Proposer recommends the following timetable:

Pre-Modification discussion	24 September 2020 / 22 October 2020
Modification considered by Panel	19 November 2020
Initial Consideration by Workgroup	26 November 2020
Workgroup Report presented to Panel	18 March 2021
Draft Modification Report issued for consultation	18 March 2021
Consultation Close-out for representations	08 April 2021
Final Modification Report available for Panel	12 April 2021
Modification Panel decision	15 April 2021 (at short notice)



Joint Office of Gas Transporters



enquiries@gasgove rnance.co.uk



0121 288 2107

Proposer:

Seán McSweeney, E.ON



Sean.Mcsweeney@eonenergy.com



07971 923 382

Transporter: Cadent



Gurvinder.Dosanjh @cadentgas.com



07773 151572

Systems Provider: Xoserve



UKLink@xoserve.c

<u>om</u>

Other:

**Kirsty Dudley** 



Kirsty.Dudley@eon energy.com



07816 172 645

#### 1 Summary

#### What

The Uniform Network Code (UNC) was drafted originally many years ago when the approach to drafting defaulted to gender specific terms. The current day approach to drafting is very different with gender now reflected with numerous categories. It is, therefore, proposed to remove specific gender references replacing them with neutral terms.

## Why

To ensure the UNC remains up to date, robust and in line with current day references, it is suggested to have an amendment to remove gender specific references to ensure the UNC remains aligned to the newer Codes, such as the Retail Energy Code (REC) which isn't defaulting to gender referencing but ensuring it remains neutral.

#### How

Updating any specific gender references such as 'he', 'him', 'his', 'her', 'Chairman' etc to neutral terms such as 'their', 'them', 'they' and 'Chairperson'.

#### 2 Governance

#### **Justification for Self-Governance**

This Modification seeks to make cosmetic changes to the Code and does not change the intention of any of the clauses as drafted. The nature of the changes can therefore be reviewed as housekeeping edits and therefore meets the Self-Governance criteria as the Modification does not have a material impact on gas consumers, competition, pipeline operations, security of supply, governance procedures and does not discriminate between code parties.

Due to the need to ensure the correct neutral term is used for each current day reference it does not meet the fast-track criteria and would require workgroup discussion and review of the legal text.

## **Requested Next Steps**

This Modification should:

- be considered a non-material change and subject to Self-Governance
- be assessed by a Workgroup.

## 3 Why Change?

Times have changed since the UNC was originally drafted, previously gender specific references were the standard but today this is not the case, with new codes such as the Retail Energy Code (REC) moving away from gender referencing which E.ON believe should be the case with the older more traditionally drafted codes.

As the Proposers, E.ON support this approach and believe that codes such as the UNC should also complete the amendments from gender specific terms to gender neutral throughout the document.

There is no legal requirement to complete this but to ensure code remains up to date and robust E.ON believe that removal of these specific terms would improve the code and modernise it whilst still keeping it as the contract between the Pipeline Operators and Pipeline Users.

A high-level review has been conducted and throughout the UNC documents we note that gender specific references occur not only in the main documents but also in the ancillary and guidance documents, to avoid further neutral reconciliation activities being completed we would seek to address all references via this Modification and not complete things piecemeal. A summary of the volume of references is below:

Chairman	34
His	74
Не	39
Him	12
Her	1
She	0
Total	160

See Appendix 1 for breakdown of where references occur throughout the UNC documents.

## **Code Specific Matters**

#### **Reference Documents**

- General
- UNC the Summary Part I
- Transportation Principle Document
- Offtake Arrangement Document
- BG Document 76 (Temperature/Demand Methodology)
- Measurement Error Notification Guidelines
- Independent Gas Transporter Arrangements Document

#### Knowledge/Skills

Working knowledge of the UNC.

## Solution

The solution is to update any specific gender references such as 'he', 'him', 'his', 'her' 'Chairman' etc to neutral terms such as 'their', 'them', 'they' and 'Chairperson'.

Specific gender references are to be replaced with the most suitable neutral term for the sentence.

Where the current term relates to a single person the translation to the neutral term needs to retain that intent-

This solution is to amend all specific gender references within the UNC and UNC Related Documents.

For the avoidance of doubt whilst such documents as BG Document 76 and the UNC Summary Document do not form part of UNC covered by amendment by Legal Text, we believe these should also be considered by industry and where necessary amended within the correct relevant governance and consulted upon.

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## 6 Impacts & Other Considerations

## Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

It is not believed to have an impact on the Switching or Code Consolidation SCR.

#### **Consumer Impacts**

None, this is a housekeeping change.

#### **Cross Code Impacts**

Although no direct impacts to any other codes it is recommended that CACoP are consulted to ensure neutral terms are introduced in all codes.

A Modification has also been raised in the IGT UNC, (Modification number IGT147).

#### **EU Code Impacts**

None, this is a housekeeping change.

#### **Central Systems Impacts**

None.

## 7 Relevant Objectives

lm	pact of the modification on the Relevant Objectives:	
Re	elevant Objective	Identified impact
a)	Efficient and economic operation of the pipe-line system.	None
b)	Coordinated, efficient and economic operation of	None
	(i) the combined pipe-line system, and/ or	
	(ii) the pipe-line system of one or more other relevant gas transporters.	
c)	Efficient discharge of the licensee's obligations.	None
d)	Securing of effective competition:	None
	(i) between relevant shippers;	
	(ii) between relevant suppliers; and/or	
	(iii) between DN operators (who have entered into transportation	
	arrangements with other relevant gas transporters) and relevant shippers.	
e)	Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as	None
	respects the availability of gas to their domestic customers.	
f)	Promotion of efficiency in the implementation and administration of the Code.	Positive
g)	Compliance with the Regulation and any relevant legally binding decisions of	None
	the European Commission and/or the Agency for the Co-operation of Energy Regulators.	

This change delivers Objective f) by ensuring the UNC remains efficient, effective and robust with its approach to gender referencing. This is essentially a housekeeping change to translate the specific terms to neutral terms, it does not seek to change the intention of any of the clauses but keeps the UNC modern in its drafting approach.

## **Implementation**

As Self-Governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

## 9 Legal Text

To be provided by the Transporters.

## 10 Recommendations

## **Proposer's Recommendation to Panel**

Panel is asked to

- Agree that Self-Governance procedures should apply
- Refer this proposal to a Workgroup for assessment.

## 11 Appendix 1

Chairman	34
His	74
He	39
Him	12
Her	1
She	0
Total	160

Status	Туре	Document	Page s	Link		Chairman		His		He		Him		Her		She	Tota I
Complet e	Main	General	589	https://www.gasgovernance.co.uk/general	1 2	TDIII – 1.4 (2) TDIV –1.4 (2) / 8.2.4 (6) / 8.2.6 / 12.9.3 (c) MR – Definition for Voting Member (2)	5 1	TDIII - 1.4 (2) TDIV - 1.4 (2) /8.2.6 MR - 4.1.7 / 4.5.5 /4.5.7 / 5.11.1 a GTA - 2.1.3 / 2.3.1 / 2.3.3 (3) / 2.3.4 (3) / 2.4.1 / 2.4.4 / 2.4.6 / 2.4.8 (2) / 2.4.10 (3) / 2.4.11 (2) / 2.5.2 (2) / 2.6.1 (3) / 2.6.2 (3) / 2.8.24 a / 2.8.24 b / 2.8.3 / 2.8.4/2.10.5 / 3.2.2 / 3.2.3 / 3.3.1 / 3.3.2 / 3.3.3 / 3.3.6 / 3.3.7 (2) / 3.4.1 / 3.4.2 (2) GTD - 4.3.6 / 5.7.5	3 0	TDIV - 8.2.4 MR - 4.4.1 a /4.4.1 b ii / 4.5.2 b ii / 4.5.5 / 4.5.7 GTA - 2.2.6 b ii / 2.3.1 / 2.4.1 (3) / 2.4.5 a / 2.4.5 b (2) / 2.6.1 / 2.10.5 (2) / 2.10.6 (2) / 2.10.6 (2) / 3.2.3 / 3.3.2 a / 3.3.7 (3.3.8 / 3.4.2 / 3.7.1 / 3.7.2 GTD - 5.3 (2)	1 2	MR - 4.5.5 (2) GTA - 2.2.8 b ii/ 2.2.8 b ii (2) / 2.2.8 b iii/ 2.3.1 / 2.3.4 / 3.3.1 / 3.3.2 a / 3.3.7	1	<b>GTD</b> - 4.3.6	0	No reference s	106
Complet e		UNC - the Summary Part I	14		1	6.3	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	1
Complet e	Related	UNC - the Summary Part II	25	http://www.ana.ana.ana.ana.ana.ana.ana.ana.ana.	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Docume nt	UNC Principles of Governance as set out in Chapter 5 of this Ofgem Document	77	https://www.gasgovernance.co.uk/gendo <u>CS</u>	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet		Legal Text Guidance	4		0	No references	0	No references	0	No	0	No	0	No	0	No	0

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е	Document							references		reference s		reference s		reference s	
Complet e	UNC Modification Proposals - Guidance for Proposers	7	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Self Governance Guidance	1	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0

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Complet e	Main	Transportation Principle Document	845	https://www.gasgovernance.co.uk/TPD	0	No references	8	TPDM - 6.6.6 c ii TPDV - 9.2.1 / 9.2.2 b / 10.8.1 / 10.8.2 b / 16.2.3 / 16.4.3 TPDX - 1.2.7	6	TPDE - 2.3.1 TPDV - 6.2.3 / 9.1.4 / 10.7.4 / 16.4.3 (2)	0	No reference s	0	No reference s	0	No reference s	14
Complet e		UNC Data Dictionary	19		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e		UNC Operations Reporting Manual v13	5		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e		AQ Validation Rules	9		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e		Class 1 Ratchet Charge Guidelines Document	4		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e		Customer Settlement Error Claims Process – Guidance Document	15		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Related Docume	Demand Estimation Methodology	11	https://www.gasgovernance.co.uk/tpddo	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	nt	Default System Marginal Price Statement	1	_	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e		Energy Balancing Credit Rules	76		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e		Emergency Curtailment Quantity (ECQ) Methodology	9		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e		Energy Settlement Performance Assurance Regime	8		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e		Framework for the Appointment of an Allocation of Unidentified Gas Expert	21		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0

Complet e	Guidelines for Sub- Deduct Arrangements (Prime and Sub- Deduct Meters)	14	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	LDZ Shrinkage Adjustment Methodology	5	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Performance Assurance Report Registers	63	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Shared Supply Meter Points Guide and Procedures	15	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency.	Ø	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Standards of Service Query Management Operational Guidelines	21	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	UNC Validation Rules	31	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0

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Complet e	Main	Offtake Arrangement Document	138	https://www.gasgovernance.co.uk/OAD	0	No references	1	OADN - 8.1.3	0	No references	0	No reference s	0	No reference s	0	No reference s	1
Complet e		BG Document 76 (Temperature/Dema nd Methodology)	79		0	No references	1	Appendix 4.4	1	Appendix 13.14	0	No reference s	0	No reference s	0	No reference s	2
Complet e		BG Document 76 Cover Note	1		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Related Docume nt	Gas Demand Forecasting Methodology Cover Note	1	https://www.gasgovernance.co.uk/OADD ocs	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e		Measurement Error Notification Guidelines	38		1 8	Section 6 Section 7 (6) Section 7a (11)	1 2	Section 8 (9) Section 14 (3)	2	Section 8 (2)	0	No reference s	0	No reference s	0	No reference s	32

Complet e	OAD Template Agreements Document	73	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Offtake Communications Document	27	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Safe Control of Operations Interface Procedure	10	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Transmission System Operator to Distribution System Operator Agreement Guidelines	23	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Work Procedure Initial Validation Cover Note	1	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Work Procedure T/PR/GQ/3 Danalyzers	17	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Work Procedure T/PR/ME2 Part 1 - General Requirements	8	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Work Procedure T/PR/ME2 Part 2 - Generic Test Procedure	34	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Work Procedure T/PR/ME2 Part 3 - Flow Weighted Average Calorific Value Offtakes	85	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0

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Complet e	Main	European Interconnection Document	91	https://www.gasgovernance.co.uk/EID	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Related	Moffat Designated Arrangements	5		0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0
Complet e	Docume nt	Covering Letter for Designation of Moffat Designated Arrangements	1	https://www.qasqovernance.co.uk/eiddoc §	0	No references	0	No references	0	No references	0	No reference s	0	No reference s	0	No reference s	0

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Complet e	Main	Independent Gas Transporter Arrangements Document	44	https://www.gasgovernance.co.uk/unc/igt ad	3	IGTADF - 7.2 /7.2.1 / 7.2.2	1	<b>IGTADF</b> - 7.1.3	0	No references	0	No reference s	0	No reference s	0	No reference s	4	
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#### Documents with references

General

UNC - the Summary Part I

Transportation Principle Document

Offtake Arrangement Document

BG Document 76 (Temperature/Demand Methodology)

Measurement Error Notification Guidelines

Independent Gas Transporter Arrangements Document