





UNC Modification		At what stage is this document in the process?
<h1>UNC 0XXX:</h1> <h2>Updating specific gender references to neutral terms</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #28a745; color: white; padding: 2px; display: flex; align-items: center; justify-content: center;">01 Modification</div> <div style="border: 1px solid #17a2b8; padding: 2px; display: flex; align-items: center; justify-content: center;">02 Workgroup Report</div> <div style="border: 1px solid #ffc107; padding: 2px; display: flex; align-items: center; justify-content: center;">03 Draft Modification Report</div> <div style="border: 1px solid #ffc107; padding: 2px; display: flex; align-items: center; justify-content: center;">04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>This modification is being raised to update any specific gender references such as 'he', 'him', 'his', 'Chairman' etc to neutral terms such as 'their', 'them', 'they' and 'Chairperson' in the Uniform Network Code.</p>		
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> subject to self-governance assessed by a Workgroup. <p>This modification will be presented by the Proposer to the Panel on 15 October 19 November 2020. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>	
	<p>High Impact: None</p>	
	<p>Medium Impact: None</p>	
	<p>Low Impact: Transporters and Shippers</p>	

Commented [DK1]: Likely to be Nov now

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Timetable	
The Proposer recommends the following timetable:	
Pre Modification discussion	24 September 22 October 2020
Modification considered by Panel	15 October 19 November 2020
Initial Consideration by Workgroup	22 October 26 November 2020
Workgroup Report presented to Panel	17 December 2020
Draft Modification Report issued for consultation	17 December 2020
Consultation Close-out for representations	12 January 2021
Final Modification Report available for Panel	15 January 2021
Modification Panel decision	21 January 2021 (at short notice)

Any questions?

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Commented [DK4]: Updated to Seán

Commented [KE2]: Could we consider a FT timetable? We will discuss at DWG in October and then it could be a Fast Track Housekeeping modification

Commented [DK3]: Timetable needs to change as it is going back to Oct Distribution

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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', '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.

It could be argued that this Modification does not need to go to workgroup and could be treated as a Fast Track **Modification**.

Commented [KE5]: Would the October pe mod discussion at DWG be sufficient? If so, it could be Fast Tracked.

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

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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:

<u>Chairman</u>	<u>34</u>
<u>His</u>	<u>74</u>
<u>He</u>	<u>39</u>
<u>Him</u>	<u>12</u>
<u>Her</u>	<u>1</u>
<u>She</u>	<u>0</u>
<u>Total</u>	<u>160</u>

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

4 Code Specific Matters

Reference Documents

None

Knowledge/Skills

Working knowledge of the UNC.

5 Solution

The solution is to update any specific gender references such as 'he', 'him', 'his', '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.

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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 [IGT 147TBC](#)).

EU Code Impacts

None, this is a housekeeping change.

Central Systems Impacts

None.

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:

Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (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.	None
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	Positive

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g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None
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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 doesn't seek to change the intention of any of the clauses but keeps the UNC modern in its drafting approach.

Commented [MB6]: Should we add the additional points mentioned by RH and BF here? "This Modification aligns the UNC with the Equality Act 2010 ensuring there is no gender discrimination in the code as well as aligns the UNC with other industry codes and practices."

8 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.

Commented [MB7]: I have not put the FT wording in yet.

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.

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