

UNC Workgroup Report	At what stage is this document in the process?
<h1>UNC 0741S:</h1> <h2>Updating specific gender references to neutral terms</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #00a651; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 01 Modification </div> <div style="background-color: #0072bc; color: white; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 02 Workgroup Report </div> <div style="border: 1px solid #9933cc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ff9900; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 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’, ‘her’, ‘Chairman’ etc to neutral terms such as ‘their’, ‘them’, ‘they’ and ‘Chairperson’ in the Uniform Network Code.</p>	
	<p>The Workgroup recommends that this Modification should be subject to self-governance</p> <p>The Panel will consider this Workgroup Report on 18 March 2021. The Panel will consider the recommendations and determine the appropriate next steps.</p>
	<p>High Impact: None</p>
	<p>Medium Impact: None</p>
	<p>Low Impact: Transporters, IGTs and Shippers</p>

Contents		
1	Summary	3
2	Governance	3
3	Why Change?	3
4	Code Specific Matters	4
5	Solution	4
6	Impacts & Other Considerations	5
7	Relevant Objectives	5
8	Implementation	6
9	Legal Text	6
10	Recommendations	6
11	Appendix 1	7
Timetable		
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 (<i>at short notice</i>)	

 Any questions?

Contact:
Joint Office of Gas Transporters

 enquiries@gasgovernance.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.com

Other:
Kirsty Dudley

 Kirsty.Dudley@eonenergy.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.

Following assessment by Workgroup, participants confirmed that the Modification should remain as Self-Governance

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
He	39
Him	12
Her	1
She	0
Total	160

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

4 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.

5 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.

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

Workgroup agreed that the principles by which the legal text had been drafted met the intent of the Modification.

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
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

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.

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.

9 Legal Text

Legal Text has been provided by Cadent and is published alongside this report. The Workgroup has considered the principles by which the Legal Text has been created and is satisfied that it meets the intent of the Solution.

Links to the Legal Text and Explanatory Table can be found here:

10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

- This Self-Governance Modification should proceed to consultation.

11 Appendix 1

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

Status	Type	Document	Pages	Link	Chairman	His	He	Him	Her	She	Total						
Complete	Main	General	589	https://www.gasgovernance.co.uk/genera	1 2 TDIII – 1.4 (2) TDIV – 8.2.4 (6) / 8.2.6 / 12.9.3 (c) MR – Definition for Voting Member (2)	5 1 TDIII – 1.4 (2) TDIV – 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) / 2.8.2 a / 2.2 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 b / 2.10.6. c / 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 – 2.2.6 b ii / 2.2.8 b i / 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 GTD - 4.3.6	0 No references	0 No references	106					
Complete	Related Document	UNC - the Summary Part I	14	https://www.gasgovernance.co.uk/gendo	1	6.3	0	No references	0	No references	0	No references	0	No references	0	1	
Complete		UNC - the Summary Part II	25		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		UNC Principles of Governance as set out in Chapter 5 of this Ofgem Document	77		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		Legal Text Guidance Document	4		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0

Complete	UNC Modification Proposals - Guidance for Proposers	7	0	No references	0										
Complete	Self Governance Guidance	1	0	No references	0										

Status	Type	Document	Pages	Link	Chairman	His	He	Him	Her	She	Total						
Complete	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 references	0	No references	0	No references	0	14	
Complete	Related Document	UNC Data Dictionary	19	https://www.gasgovernance.co.uk/tpdocs	0	No references	0	No references	0	No references	0	No references	0	No references	0	0	
Complete		UNC Operations Reporting Manual v13	5		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		AQ Validation Rules	9		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		Class 1 Ratchet Charge Guidelines Document	4		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		Customer Settlement Error Claims Process – Guidance Document	15		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		Demand Estimation Methodology	11		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		Default System Marginal Price Statement	1		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		Energy Balancing Credit Rules	76		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		Emergency Curtailment Quantity (ECQ) Methodology	9		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete		Energy Settlement Performance Assurance Regime	8		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0
Complete	Framework for the Appointment of an Allocation of Unidentified Gas Expert	21	0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0		

Complete	Guidelines for Sub-Deduct Arrangements (Prime and Sub-Deduct Meters)	14	0	No references	0	0										
Complete	LDZ Shrinkage Adjustment Methodology	5	0	No references	0	0										
Complete	Performance Assurance Report Registers	63	0	No references	0	0										
Complete	Shared Supply Meter Points Guide and Procedures	15	0	No references	0	0										
Complete	Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency.	9	0	No references	0	0										
Complete	Standards of Service Query Management Operational Guidelines	21	0	No references	0	0										
Complete	UNC Validation Rules	31	0	No references	0	0										

Status	Type	Document	Pages	Link	Chairman	His	He	Him	Her	She	Total							
Complete	Main	Offtake Arrangement Document	138	https://www.gasgovernance.co.uk/OAD	0	No references	1	OADN - 8.1.3	0	No references	0	No references	0	No references	0	No references	1	
Complete	Related Document	BG Document 76 (Temperature/Demand Methodology)	79	https://www.gasgovernance.co.uk/OADDocs	0	No references	1	Appendix 4.4	1	Appendix 13.14	0	No references	0	No references	0	No references	2	
Complete		BG Document 76 Cover Note	1		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0	0
Complete		Gas Demand Forecasting Methodology Cover Note	1		0	No references	0	No references	0	No references	0	No references	0	No references	0	No references	0	0
Complete		Measurement Error Notification Guidelines	38		1	Section 6 Section 7 (6) Section 7a (11)	1	2	Section 8 (9) Section 14 (3)	2	Section 8 (2)	0	No references	0	No references	0	No references	32

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

Status	Type	Document	Pages	Link	Chairman	His	He	Him	Her	She	Total
Complete	Main	European Interconnection Document	91	https://www.gasgovernance.co.uk/EID	0	No references	0	No references	0	No references	0
Complete	Related Document	Moffat Designated Arrangements	5	https://www.gasgovernance.co.uk/eiddocs	0	No references	0	No references	0	No references	0
Complete		Covering Letter for Designation of Moffat Designated Arrangements	1		0	No references	0	No references	0	No references	0

Status	Type	Document	Pages	Link	Chairman	His	He	Him	Her	She	Total
--------	------	----------	-------	------	----------	-----	----	-----	-----	-----	-------

Complete	Main	Independent Gas Transporter Arrangements Document	44	https://www.gasgovernance.co.uk/unc/igtad	3	IGTADF - 7.2 / 7.2.1 / 7.2.2	1	IGTADF - 7.1.3	0	No references	4						
----------	------	---	----	---	---	------------------------------	---	----------------	---	---------------	---	---------------	---	---------------	---	---------------	---

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