





Modification	At what stage is this document in the process?
<h1>IGT147:</h1> <h2>Updating specific gender references to neutral terms</h2>	<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</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'.</p>	
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> subject to self-governance <u>assessed by a Workgroup send out for consultation</u> <p>This modification will be presented by the Proposer to the Panel on 23rd October 2020. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>
	<p>High Impact:</p> <p>None</p>
	<p>Medium Impact:</p> <p>None</p>
	<p>Low Impact:</p> <p>Pipeline Operators, Pipeline Users</p>

Contents

1	Summary	3
2	Governance	3
3	Why Change?	3
4	Code Specific Matters	4
5	Solution	4
6	Impacts & Other Considerations	4
7	Relevant Objectives	5
8	Implementation	5
9	Legal Text	6
10	Recommendations	6



Any questions?

Contact:

Code Administrator



igtunc@gemserv.com



02070901044

Proposer:

Kirsty Dudley



Kirsty.Dudley@eoneenergy.com



07816172645

Timetable

Following a Pre-Modification discussion on 8th October 2020, the Workgroup noted that this Modification did not need a Workgroup and noted any issues should be drawn out through the consultation. The timetable below sets this out and affords one month for the legal text drafting to take place before coming back to the Panel for a decision on Consultation.

The Proposer recommends the following timetable:

Pre-Modification consideration by Workgroup	8 th October 2020
Amended Modification considered by Workgroup	NA
Draft Modification Report presented to Panel	27 th November 2020
Draft Modification Report issued for consultation	2 nd December 2020
Consultation Close-out for representations	23 rd December 2020
Variation Request presented to Panel	dd month year
Final Modification Report available for Panel	8 th January 2021
Modification Panel decision	22 nd January 2021

1 Summary

What

The IGT UNC was designed originally many years ago when the approach to legal text creation defaulted to gender in drafting. The current day the approach to drafting gender is very different with preferences now defaulting to numerous categories, it is therefore, proposed to remove specific gender references replacing them with neutral terms.

Why

To ensure code remains up to date, robust and inline with current day practices, the amendment to remove gender specific references would ensure code remains aligned to the newer codes. This is the direction the Retail Energy Code (REC) is taking, which isn't defaulting to gender referencing but ensuring it remains neutral in its approach.

How

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

Note: the amendment of Chairman to Chairperson is only required if IGT140 is not approved.

2 Governance

Justification for Self-Governance Procedures

It is proposed this follows the self-governance route as the changes are cosmetic to the code and doesn't change the intention of any of the clauses as drafted and can therefore be reviewed as housekeeping edits and therefore meets the self-governance criteria.

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 subject to self-governance
- ~~be sent out for consultation assessed by a Workgroup~~

The Modification proposal had a pre-modification discussion at the October 2020 workgroup; the members were in support of the solution but did not feel that it needed to be developed at a workgroup. It was recommended that the Code Administrator and Pipeline Operator providing the legal text required adequate time to develop the text before sending it out for consultation rather than going via the Fast Track route.

3 Why Change?

Times have changed since the IGT 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.

As the proposers, we support this approach and believe that codes such as the IGT UNC should also complete the amendments from gender specific terms to gender neutral throughout the drafting.

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

4 Code Specific Matters

Technical Skillsets

Understanding of the IGT UNC.

Reference Documents

None.

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 reference is to be replaced with the most suitable neutral term as a replacement may not see the sentence read correctly.

The amendments should be throughout the main IGT UNC document and all associated ancillary documents.

The amendment to Chairperson should be captured as part of IGT140 but as that modification has not been approved yet we have also included that gender reference as part of this solution.

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 we would recommend a CACoP discussion to ensure neutral terms are introduced in all codes. A modification will ~~has also been~~ raised in the UNC ~~reference~~ UNC 073X.

Environmental Impacts

None, this is a housekeeping change.

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) Co-ordinated, 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 agreements 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 Cooperation of Energy Regulators	None

This change delivers Objective F by ensuring code 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 keep code modern in its drafting approach.

8 Implementation

The next standard release following approval.

9 Legal Text

Legal text to be provided by the Pipeline Operators.

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.~~ Send out for consultation