
Critical Contingency Operator

2016 Test Exercise Report

Exercise Kakama 22 June 2016

Prepared for: **Gas Industry Company**

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Acknowledgment

The success of the exercise was directly attributable to the time and effort contributed by the participants during the planning, execution and feedback phases. These contributions are recognised and appreciated and have assisted in identifying valuable improvement opportunities.

Particular thanks go to OnGas for being an observed Retailer and to the observers provided by First Gas Limited and the Gas Industry Company.

1. Introduction

The Critical Contingency Operator (CCO) is required by regulation 34 of the Gas Governance (Critical Contingency Management) Regulations 2008 (the regulations), to instigate test exercises. These exercises should test that:

- the Critical Contingency Management Plans (CCMPs) comply with regulation 25 and achieve the purpose of the regulations
- the CCMPs contain the contact details required by regulation 25 and that they are current; and
- the list of emergency contact details maintained by Retailers required by regulation 43 are current

After the exercise, regulation 34 also requires that:

- within 10 business days of the exercise each Transmission System Owner (TSO) must provide a report to the CCO explaining why it's CCMP does or does not comply with regulation 25 and gives effect to the purpose of the regulations; identifies improvements and recommends CCMP amendments.
- within 10 days of receiving the TSO reports, the CCO provides a report to the industry body that assesses the effectiveness of the CCMPs; evaluates any amendments recommended by the TSOs; and identifies any amendments to the regulations, CCMPs, communications plan or information guide that would improve the effectiveness in achieving the purpose of the regulations.

This report is based on:

- the CCO's pre-test exercise audit of the TSO
- the TSO post exercise reports
- Retailer self-assessment forms and other participant feedback
- observations from observers placed in the TSO control room and a Retailer's office during the exercise; and
- the CCO's own observations

After completion of the exercise and the required reporting, a change process occurs to implement any recommendations arising, with consultation where appropriate.

2. Executive Summary

Exercise Kakama provided an opportunity for parties to practice their response to a critical contingency event in a safe environment and subsequently enhance their knowledge and competency for dealing with an actual event. The exercise successfully tested the core critical contingency phases and information flows associated with an event, such as declaration, demand curtailment and restoration, public information statements, Retailer and consumer compliance updates as well as event termination.

This report concludes that the TSO CCMPs substantially comply with regulation 25 and are effective in achieving the purpose of the regulations and identifies a number of recommendations detailed in Section 6 to improve the efficiency of processes and procedures to support application of the CCMPs.

The key recommendations relate to reviewing the critical contingency pressure thresholds which the TSO has undertaken to complete as part of the transition from the two current CCMPs to a single First Gas

CCMP. First Gas intends to commence the transition to a single CCMP during 2016 with the objective to have the revised CCMP reviewed and approved by the Expert Adviser (as defined in the regulations) and the GIC prior to the next scheduled critical contingency test exercise. The review process will also include consultation with industry stakeholders.

A key point of difference in this year's test exercise was the presence of CCO personnel on-site at First Gas control room in Bell Block. The benefits of both parties working from the same location were clearly evident during the course of the exercise.

Participation from Retailers was appreciated. However, some concerns remain around the apparent time taken for the curtailed consumers to comply with curtailment directions and the generally low levels of compliance based upon information received from Retailers in their periodic updates. The TSO and CCO intend to further review the feedback provided by Retailers in their Self-Assessment Forms and investigate these issues to establish whether further education or other steps need to be explored.

The CCO and TSO conclude from this exercise that the industry remains well prepared to respond to a potential or actual critical contingency. The recommendations proposed will further improve performance and response to such events.

3. First Gas as Transmission System Owner

On 20 April 2016, First State Investments completed the purchase of Vector Gas Limited (Vector), which has subsequently been renamed as First Gas Limited (First Gas). First Gas then purchased the Maui Pipeline assets from Maui Development Limited (MDL) on 15 June 2016. Consequently, as of 15 June 2016 First Gas was the single TSO for the purposes of the regulations.

This resulted in a need to amend the CCMP's previously held by Vector and MDL. Due to the timing of the Maui Pipeline sale completion (15 June) and Exercise Kakama (22 June), the decision was made to retain two First Gas CCMP's – one pertaining to the Maui Pipeline (the previous MDL CCMP) and one pertaining to the remainder of the transmission system (the previous Vector CCMP). The aim was to have two CCMP's that accurately reflected the ownership of the transmission system as at the date of Exercise Kakama.

Therefore, after the Maui Pipeline acquisition but prior to Exercise Kakama, First Gas circulated the following two updated CCMPs to industry stakeholders:

1. the "First Gas Critical Contingency Management Plan: MAUI PIPELINE"; and
2. the "First Gas Critical Contingency Management Plan".

The changes to both the documents were not material and simply reflected the change of asset ownership and First Gas as the single TSO. Industry stakeholders were advised that while the TSO entities referred to in the respective documents may have changed, the concepts and processes in the CCMPs had not.

First Gas does intend to transition to a single CCMP that covers the entire Transmission System. First Gas also intends to take that opportunity to address any suggested CCMP improvements that may result from this test exercise or the recent critical contingency event on 24 May.

4. Exercise Scenario

The exercise scenario was designed and managed by the CCO and centered on 3rd party damage to the 200mm First Gas transmission pipeline just south of Turakina (the 100 line) resulting in a gas escape.

The exercise required the CCO, TSO and Retailers to carry out tasks and activities associated with the regulations, CCMPs and other relevant documents.

The test exercise was desk-top only. Formal notices were sent and communications made, but no physical actions affecting equipment or gas supplies were carried out.

A series of exercise injects were pre-designed and issued by the CCO at set times during the course of the exercise. These injects are designed to ensure the full range of activities required to meet the test objectives are triggered. The complete injects are detailed in Appendix A.

Particular features arising from this year's scenario were:

- First Gas as the pipeline Asset Owner and single TSO;
- the CCO co-locating with the TSO at the First Gas control room to manage the event;
- greater time allocated for Retailers to act on curtailment instructions; and
- observation of a Retailer.

The CCO and TSO arranged for observers to be positioned in the First Gas control room and at a Retailer's premises. These observers were not directly involved in the exercise and were present to monitor and record events as they occur. Observers included representatives from the Gas Industry Company (GIC).

An exercise debriefing was held with CCO, TSO and observers on conclusion of the exercise.

5. Summary of Assessment against Test Criteria

5.1 CCO Assessment

The CCO considers that the TSO CCMPs comply with regulation 25 and are effective in achieving the purpose of the regulations. There are two recommendations outstanding on the TSO from the 2015 Exercise Validation for potential changes to the First Gas CCMP, that the CCO reiterates as still being necessary, namely:

- review whether each threshold is still representative for that part of the transmission system or whether it needs to be changed in light of any system changes, as well as including the rationale for each threshold in the CCMP; and
- include a description of situations or occasions where thresholds may be breached for short durations due to transient conditions and the response to such occurrences

The CCO considers that the CCMPs contain the contact details required by regulation 25 and that they are substantially current. However, the CCO considers that the management and maintenance of the contact details remains as an opportunity for improvement and recommends that the TSO:

- review and document the OATIS contacts management and maintenance process and implement any changes required to ensure the contact information provides (and continues to provide) a list that is complete and accurate.

There are further recommendations from this exercise detailed in Section 6 to improve the efficiency of processes and procedures to support application of the First Gas CCMPs.

5.2 TSO Assessment

First Gas considers that the First Gas CCMP complies with regulation 25 and when implemented during the test exercise gave effect to the purpose of the regulations. On this basis, First Gas considers that the First Gas Critical Contingency Management Plan: MAUI PIPELINE will also give effect to the purpose of the regulations.

The TSO report made recommendations detailed in Section 5 of this report, to improve the efficiency of processes and procedures to support application of the First Gas CCMP. The TSO does not consider that there is any need to amend the First Gas CCMP based upon the outcomes of Exercise Kakama alone.

First Gas does intend to transition to a single CCMP that covers the entire Transmission System. First Gas intends to also take that opportunity to address the CCO recommendations pertaining to the review of pressure thresholds and their possible breach during transient operational conditions. If any other CCMP amendments are identified as a result of previous critical contingency test exercises or critical contingency events, First Gas will take them into account during the transfer to a single CCMP.

6. Recommendations

The following is a summary of all recommendations arising from this report, some of which originate from the TSO post exercise report:

Item	Recommendation	Responsible
1	<i>In the process of developing a single combined CCMP, review whether each threshold is still representative for that part of the system or whether it needs to be changed in light of any system changes. Include the rationale of each threshold in the CCMP.</i>	TSO
2	<i>Include a description of situations or occasions where thresholds may be breached for short durations due to transient conditions and the response to such occurrences into the single combined CCMP.</i>	TSO
3	<i>Review and document the OATIS contacts management and maintenance process and implement any changes required to ensure the contact information provides (and continues to provide) a list that is complete, accurate and up to date.</i>	TSO
4	<i>Review Gas Control systems and processes to ensure that latitude and longitude references can be easily understood and processed in order to promptly establish the specific site location. If necessary, make changes to systems and processes.</i>	TSO

Item	Recommendation	Responsible
5	<i>Reinforce in training and associated documentation (such as First Gas procedure 3207704 “Critical Contingency Response Actions” and Communications Protocol) that prompt notification of the CCO is a priority, even when the full facts are not yet known.</i>	TSO
6	<i>TSO and CCO to review and determine whether the processes for the review and publication of media/public statements (both internally within First Gas and externally with the CCO) are adequate.</i>	TSO & CCO
7	<i>GIC, CCO and TSO work with external communications personnel across the gas supply chain to ensure that any external communications are accurate, consistent and unambiguous. Consider holding a further workshop or familiarisation session with external communications representatives</i>	GIC, TSO & CCO
8	<i>For efficiency and accuracy, consider whether the Duty Officer (incident controller) should be the sole approval point for media releases within First Gas.</i>	TSO
9	<i>Correct Duty Officer Contact Details and include Transmission System Map in First Gas Crisis Communications Plan.</i>	TSO
10	<i>Consider feasibility and options for a mapped drive being available via WiFi for the CCO to access SCADA data files within the control room.</i>	TSO
11	<i>TSO and CCO to review feedback from Retailers’ Self-Assessment Forms to assess the apparent time taken for the curtailed consumers to comply with curtailment directions and the low levels of compliance. Investigate these issues further to establish whether further education or other steps (such as a review/audit) need to be explored in the area of Retailer and consumer compliance.</i> <i>TSO to consider a “Retailer Activation” step in its procedures – getting Retailers to send through a test e-mail to Critical Compliance which confirms who their contact during the CC is and what e-mail address the updates will be coming from.</i>	TSO & CCO
12	<i>Investigate what mechanisms are reasonably available to verify or evidence the level of compliance (outside of SCADA data/trends during an actual event)?</i>	TSO & CCO
13	<i>Make necessary updates to First Gas procedure 3207704 “Critical Contingency Response Actions” contact lists.</i>	TSO
14	<i>Amend First Gas procedure 3207704 “Critical Contingency Response Actions” to include prompts to send on any Retailer responses received by Gas Control or Duty Officer to Critical Compliance</i>	TSO
15	<i>Review if First Gas distribution list requires SMS updates for this contact list and if so set up through First Gas IT</i>	TSO
16	<i>Resolve why some Fonterra representatives requested that they stop receiving email notifications during the course of the exercise.</i>	TSO

Item	Recommendation	Responsible
17	<i>Update the First Gas Reception Communications Protocol.</i>	TSO
18	<i>CCO to investigate why conference number was not working and take any necessary remedial steps.</i>	CCO
19	<i>Formalise co-location of the CCO at the TSO's control room as a preferred operating mode for an event when circumstances allow.</i>	TSO/CCO
20	<i>Amend the CCO Communications Protocol to provide for the TSO to issue a potential critical contingency notice commensurate with urgent oral notice from the CCO.</i>	TSO/CCO

7. Pre Test Exercise Audit of TSO by CCO

The pre-exercise elements were audited on the 16 June 2016 (6 days prior to the actual exercise date). All items were audited by holding a pre-arranged interview with the First Gas Senior Manager Transmission Services and Control Room Manager.

7.1 Does the CCMP provide for compliant thresholds that meet the purpose of the regulations? [r25(1)(a)]

The First Gas (v10.3) CCMP was published on 16 June 2016 to reflect the change of ownership from Vector. The First Gas Maui Pipeline CCMP (v7.2) was published on 16 June 2016 to reflect the change of ownership from MDL. Both of these CCMP's have only been amended to reflect the change of ownership and the context of a single TSO. The thresholds listed in the current CCMP's have not changed with respect to previous versions of the CCMP's.

The rationale for each threshold is not documented in the CCMP nor readily available elsewhere and as a result, previous audits have not been able to clearly establish whether each threshold is still representative for that part of the system or whether it needs to be reviewed in light of any system changes. An action on the TSO from last year's audit and exercise report was:

Item	Recommendation	Party
1	<i>Document the rationale for each threshold; confirm that each threshold is still representative for that part of the system or whether it needs to be reviewed in light of any system changes; consider adding the threshold rationale into the CCMPs.</i>	TSOs

Extract from 'Exercise Validation Exercise Report', 22/07/2015

This action remains outstanding. However, the TSO has stated that:

"As a result of the First State Investments (hereafter referred to as "First Gas") purchasing both the Vector Gas Limited transmission assets and the Maui Pipeline, there will be a sole TSO. TSO acknowledges that there have been changes to:

(a) aspects of the transmission system,

-
- (b) *some operating procedures, and*
 - (c) *gas supply and demand factors,*

since the thresholds currently recorded in the Regulations were originally developed. While the TSO believes that the current thresholds remain suitable to operate under for critical contingency purposes, the TSO accepts that a review of the applicable thresholds and their associated rationale is warranted. TSO undertakes to complete such a review in preparation for a single combined CCMP.”

Recommendation:

In the process of developing a single combined CCMP, review whether each threshold is still representative for that part of the system or whether it needs to be changed in light of any system changes and consider including the rationale of each threshold in the CCMP.

7.2 Does the CCMP contain descriptions of the events that the TSO considers may feasibly result in a breach of the thresholds? [r25(1)(b)]

The CCMP's do not describe situations or occasions where thresholds may be breached for short durations due to high demand or system flow changes (i.e. transient conditions). Following Exercise Validation last year, the TSO has:

1. Reviewed the calculation algorithm within SCADA that monitors the pressure thresholds and increased the time sampling frequency in order to minimise the occurrence of “nuisance” alarms.
2. Developed a procedure/decision tree for Gas Control Operators to follow when thresholds alarm in SCADA for short durations.

The TSO has also confirmed that these situations and the method for managing them, will be incorporated in the scope of work for a single combined CCMP.

Recommendation:

Include a description of situations or occasions where thresholds may be breached for short durations due to transient conditions and the response to such occurrences into the single combined CCMP.

7.3 Does the CCMP contain actions that the TSO may take to remedy any threshold breach? [r25(1)(c)]

The CCMPs both make reference to the Pipeline Emergency Response Plans and associated Specific Event Guides for the management of pipeline emergencies. A brief review of Emergency Response Plan and some sample Specific Event Guides found that the plans are being actively managed and kept up to date.

7.4 Are the contact details in the CCMP current? [r25(1)(i)]

Copies of the contact reports generated in OATIS were obtained for review. The contacts are used by the OATIS system to automatically send emails and SMS text messages to affected parties alerting them to the existence of the full notices in OATIS. The full notice is not sent with the email or text alert and affected parties have to access the notices on the OATIS website.

Maui OATIS Contact List

The following observations were made from a review of the MDL OATIS Contact List (which may or may not be material):

- There are contacts for some people who have left that organisation or the industry.
- Some contacts are repeated.
- Vector contacts need to be updated to reflect the change of ownership.
- MDL contacts need to be updated to reflect the change of ownership.

Vector OATIS Contact List

The following observations were made from a review of the Vector OATIS Contact List (which may or may not be material):

- There are contacts for some people who have left that organisation or the industry.
- Some contacts are repeated
- There are some contacts recorded for E-Gas
- Vector contacts need to be updated to reflect the change of ownership.

The following observations were made from a review of the Vector OATIS Contact List (which are considered material):

- ***There is no contact information recorded for Switch Utilities or Pulse Energy. Neither party ships gas and there is no provision in OATIS for “non-Shipper” contacts.***
- ***There are no contacts for First Gas as a Network Operator***

Two actions on the TSO from last year’s pre-exercise audit and report were:

Item	Recommendation
7	<i>Review the Contact List maintenance process to include a mechanism for ensuring that key contacts that are non-routine users of OATIS are kept up-to- date or maintained.</i>
8	<i>Develop and implement an internal routine review process to provide assurance that the ‘self-management’ approach for the contact information provides (and continues to provide) a list that is complete and accurate.</i>

Extract from ‘Exercise Validation Exercise Report’, 22/07/2015

In response to these actions, the TSO has stated that:

“As a result of the First Gas purchase of Vector Gas Limited and the Maui Pipeline, the TSO does intend to revisit how contacts are maintained. There are currently some differences between how Vector and MDL (as TSO’s) previously maintained contacts, and First Gas intends to align these processes to the maximum extent possible.

The TSO is also aware that a key purpose of the CCO’s “Information Guide” is to govern the communication flows between the CCO and other interested parties or stakeholders (presumably including those who are either non-users or non-routine users of OATIS). The TSO would like to further

discuss with the CCO the interface and any overlap between the TSO's communications pursuant to its CCMP/Communications Plan and the CCO's Information Guide (especially to those non-routine users of OATIS). The TSO does provide all of the OATIS "operational contacts" with a monthly reminder (via SMS and email) to revisit their contact details to make sure they are all current and correct. The TSO also intends to introduce a 6-monthly proactive "audit" of contact details that will be seeking a positive response from each of the listed contacts. The exact details of such an approach have not been finalised yet and the TSO would be happy to discuss this further with the CCO."

The findings from this pre-exercise audit are an improvement on the findings from the pre-exercise audit for 'Exercise Validation' in 2015. However, management and maintenance of the contact lists remains an opportunity for further improvement.

Recommendation:

Review and document the OATIS contacts management and maintenance process and implement any changes required to ensure the contact information provides (and continues to provide) a list that is complete, accurate and current including relevant non-Shipper contacts.

8. TSO Exercise Test Criteria and Observations

8.1 Does the CCMP have a process for demand curtailment and restoration consistent with the purpose of the regulations? [r25(1)(d)]

Demand curtailment and restoration notices were all issued successfully and in accordance with the CCMPs. A summary of the notices issued by the CCO to the TSO and by the TSO to relevant parties are included in Appendix C.

8.2 Does the CCMP have a communications plan describing how the TSO will communicate to and from the participants and within what timeframes? [r25(1)(e)]

Section 3 of the First Gas CCMP details the communication plan. The communications plan describes the notices that First Gas will issue to affected parties during a critical contingency event, the reciprocal communications and the timeframes under which those communications will take place.

The First Gas internal procedure 3207704 "Critical Contingency Response Actions" was utilised during the exercise to facilitate correct communications, with status update information contained within the Security of Supply Update form. This procedure, form and the communication process used was consistent with that described in section 3 and appendices 1 to 7 of the First Gas CCMP.

Additionally, the security of supply updates enabled First Gas to provide information to the CCO such that both First Gas (as Asset Owner) and CCO could publish consistent public statements that met the requirements of sections 1 and 2 of Schedule 5 of the regulations.

A deliberate feature of this year's exercise was for the CCO to be co-located with the TSO at the First Gas control room to further test and expand on the experience of the actual critical contingency on 24 May 2016.

Establishment work courtesy of the TSO enabled the CCO to access all required systems and facilities. The benefits of both parties working from the same location were clearly evident throughout the exercise and included:

- CCO being able to view SCADA screens and monitor system conditions;
- Access to drawings and system information;
- Face to face communications between CCO and TSO minimising delays and scope for miscommunication; and
- Reducing time delays associated with the SCADA data transfer process

Recommendation:

Formalise co-location of the CCO at the TSO's control room as a preferred operating mode for an event when circumstances allow.

8.3 Does the CCMP contain the contact details of suitably qualified TSO employees responsible for giving communications and directions under the CCMP and Communications Plan? [r25(1)(f)]

Appendix 6 of the First Gas CCMP contains appropriate and up to date contact details of the suitably qualified TSO employees responsible for giving communications and directions under the CCMP and communications plans. These were used to establish initial contact between First Gas and the CCO at the start of the exercise via the First Gas control room and to the nominated person who is the Transmission Duty Manager. The Duty Manager became the key contact point for the CCO and as mentioned previously, co-location in the control room helped facilitate effective communications.

The communications plan also recognises that during a significant event, the Duty Manager would have significant communication demands for a number of stakeholders and as such may not be able to provide sufficient, timely information to the CCO. For such events, the TSO has established a CCO Liaison role to take up such tasks.

For the exercise, the TSO designated the CCO Liaison to a First Gas Commercial representative in Wellington to receive, assess and collate the Retailer compliance updates. This role received all of the Retailer updates and sent the CCO a condensed summary of all those updates to provide feedback on the level of compliance with curtailment instructions.

A general theme of the exercise appeared to be inconsistent levels of compliance information being provided by Retailers to the CCO Liaison role. This is discussed further in Section 9.1.

8.4 Does the CCMP detail circumstances in which the TSO may consider restoration should be directed in an order different from the regulations? [r25(1)(g)]

Section 5.5 of the First Gas CCMP details the steps taken for considering alternative restoration arrangements. This was not specifically tested through the exercise, as the scenario was that all bands had demand restored at the same time.

8.5 Does the CCMP have a process to determine the contingency imbalances? [r25(1)(h)]

Appendix 8 of the First Gas CCMP and Section 5 of the Maui Pipeline CCMP describe the relevant contingency imbalance calculation methodologies.

Exercise Kakama was a “regional” critical contingency so no critical contingency imbalances would have been calculated subsequent to the termination of the event.

8.6 Does the CCMP provide effective mechanisms for making information available to the CCO? [r25(1)(j), r38, Communications Protocol]

Sections 3.8 and 4 of the First Gas CCMP address communications with, and the provision of information to, the CCO. The document refers to the CCO Communications Plan for the detail. Exercise Kakama was carried out in a manner consistent with the current CCO Communications Plan.

Detailed communication was also managed through the CCO’s Communications Protocol. The Communications Protocol sets out the information requirements that apply to the TSO during normal system conditions, as well as during abnormal system conditions which do not amount to a potential or actual critical contingency. These requirements are consistent with sections 38 and 38A of the regulations. A summary of the Communications Protocol is provided in Appendix 11 of the CCO’s Communications Plan.

Not all processes in Communications Protocol were needed and therefore not tested. Co-location eliminated the need for some of the processes and made it easier for information to be made available to the CCO.

Overall, the communication processes used were consistent with that described in section 3 and appendices 1 to 7 of the First Gas CCMP.

8.7 Is there a protocol for informing the CCO of potential CC conditions? [r25(1)(j), r38(1A)(a)(i)]

Section 2 of the First Gas CCMP addresses pre-critical contingency and sets out the conditions under which First Gas will notify the CCO of an event it believes could or would result in a critical contingency scenario. It also states that First Gas will communicate with the CCO in accordance with the CCO Communications Plan.

The exercise was carried out in a manner consistent with the CCMP and the CCO Communications Plan, including the rigorous timeframes on communicating the event.

8.8 Are the CCMPs consistent with the MPOC and VTC? [r25(2)]

No inconsistencies between the CCMP and VTC were observed as a result of this exercise.

9. CCO Exercise Test Criteria and Observations

9.1 CCO Process for determining, declaring and notifying critical contingency [r48-49]

The TSO briefed the CCO on the event based on the first inject. The CCO was informed that no pressure threshold had been breached, however was subsequently advised that the gas escape would require full pipeline isolation. The CCO verified with the TSO that isolating the pipeline would result in a pressure threshold being breached.

At 09:30, the CCO determined that a breach of threshold was unavoidable and gave urgent notice (oral) to the TSO that a critical contingency was being declared at 09:30 on 22 June 2016 and written notice would be issued as soon as possible.

The critical contingency declaration notice was subsequently issued to the TSO and published on the CCO website within required timeframes.

Time is usually of the essence when issuing a declaration notice. Regulation 23 provides for an urgent notice to be given orally. The CCO Communications Protocol defines a process for the TSO to issue a declaration notice to Retailers and Large Consumers commensurate with urgent oral notice from the CCO.

In support of the regulations, a process has been defined in the CCMPs, CCO Communications Plan and CCO Information Guide for the CCO to issue a potential critical contingency notice if an event has occurred that is likely to result in a breach of one or more of the contingency thresholds. Again, time is usually of the essence for issuing such notices. It was observed during the exercise that the process for the TSO to issue a formal notice commensurate with an urgent oral notice from the CCO as defined in the regulations should also apply to the potential critical contingency notice.

Recommendation:

Amend the CCO Communications Protocol to provide for the TSO to issue a potential critical contingency notice commensurate with urgent oral notice from the CCO.

9.2 CCO process for determining and declaring regional status [r52A]

The exercise scenario required isolation of a section of the First Gas 100 pipeline resulting in the entire system downstream of the isolation point being isolated from any source of gas supply and being dependent on residual linepack.

The CCO determined that this scenario constituted a regional critical contingency and this was notified as a part of the declaration notice.

9.3 CCO processes for issuing notices during a CC event [r51,52, 53, 59]

The Communications Protocol incorporates a process with associated timeframes for the TSO to provide information to the CCO that is considered necessary to ensure that the CCO has the information required to prepare and issue notices. This process includes steps for the TSO to review the CCO's draft notices. Given the co-location of the CCO and TSO in the First Gas control room, a number of the steps were circumvented and the review of the draft notices prepared by the CCO worked very effectively and enabled the CCO to accelerate the process of issuing notices.

All notices were sent to the correct parties and stakeholders and contained the correct information and were given within required timeframes.

There was one over-sight. The declaration notice was issued to the TSO in 'word' format rather than the preferred .pdf format. The TSO queried this prior to publishing a .pdf version on OATIS.

9.4 CCO processes for demand curtailment, exploration of alternative supply and restoration [r53]

Observers noted there was a well-reasoned approach to determining proposed curtailment, bolstered by checking with the TSO and obtaining clear agreement.

Exploration of alternative supply wasn't relevant to this regional scenario.

9.5 CCO process for determining and notifying termination [r60]

These were observed as being effective and in accordance with the CCO Communications Plan.

9.6 CCO modelling of the system operates effectively and gives consistent results [r53, r38]

The curtailment and restoration decisions were supported by a robust modelling tool. The TSO was able, when requested to provide the most recent SCADA data file by copying it on to a USB stick and handing it to the CCO for uploading to the CCO load model within a few minutes. This process eliminates any delays associated with the SCADA Data File Transfer Process and is recognised as another benefit of the TSO and CCO co-locating.

9.7 CCO publishes information [r54A, Schedule 5]

Both the CCO and First Gas (as Asset Owner) had obligations to provide public statements in accordance with Schedule 5 of the regulations.

For the purpose of the exercise, both parties also utilised the support of external media representatives to assist with preparing media statements, however, these parties were all working remotely from the TSO and CCO.

The TSO provided information to the CCO with the required statement about what action the asset owner was taking to resolve the event and the CCO was able to publish a status update notice compliant with Schedule 5 at 12:30.

In parallel with the CCO's public statement, the TSO issued a series of media statements throughout the exercise (Appendix D). The CCO considers that the proactive approach taken to provide information was encouraging. However, some observers noted that there was some ambiguous and potentially misleading information in the statements, such as: *'the statement does not reference Exercise Kakama'*; *'no mention of the pipeline to Wellington'*; *'missing key centres of demand like Palmerston North'*. The errors were identified and corrected as the exercise progressed so overall it was an excellent learning opportunity.

Similarly, some Retailers took the opportunity to prepare and provide a media statement (Appendix D) that would have been used if the CCO had instructed Retailers to request domestic gas users to conserve gas. (NB, this instruction was not given during the exercise however the proactive step taken by the Retailers is appreciated). Again there was some ambiguous and potentially misleading information in the statements, such as: *'This message is for domestic and small commercial gas consumers'*; *'the TSO and CCO are working directly with large industrial users to reduce their gas use'*. The CCO informed the Retailer that such appeals would not apply to small commercial gas consumers as they will be directed in accordance with the regulations and large consumers had been curtailed completely. Again, despite the errors, this was an excellent learning opportunity.

Recommendations:

The TSO has made a number of recommendations in relation to publishing information which are supported by the CCO:

- TSO and CCO to review and determine whether the processes for the review and publication of media/public statements (both internally within First Gas and externally with the CCO) are adequate.
- GIC, CCO and TSO to work with external communications personnel across the gas supply chain to ensure that any external communications are accurate, consistent and unambiguous. Potentially hold a further workshop or familiarisation session with external communications representatives.
- For efficiency and accuracy, consider whether the TSO Duty Officer (incident controller) should be the sole approval point for media releases within First Gas.

9.8 CCO performs to required standard [SPACCO Schedule 2]

Schedule 2 of the SPACCO sets performance standards and target/measures for during a critical contingency event for determining; declaring; decision making; communication and termination.

The observers concluded that the CCO had performed to the required performance standards

10. Retailers and Large Consumers Exercise Test Criteria & Observations

10.1 Participation

All Retailers were requested to participate in the exercise and issued with a Participants Briefing on 9 May 2016 and asked to indicate their level of participation in the exercise no later than Friday 17 June. A subsequent reminder was sent by the CCO on 10 June.

Participation levels are:

- Full Retailers communicate with all consumers affected by the exercise.
- Partial Retailers communicate with a representative sample of consumers affected by the exercise.
- Facilitation Retailers make no communication with consumers but provide evidence that emergency contact details are current.

Post exercise, all Retailers were requested to complete and return to the CCO the self-assessment form (Appendix F of the Participants' Brief) as soon as practicable, but in any case no later than Wednesday 6 July. A summary of Retailer response, participation and feedback is provided below:

Retailer	Indicated Level of Participation	Self-Assessment Reported Level of Participation
Contact Energy	Not provided	Facilitation
Energy Direct NZ (Wanganui Gas)	Not provided	Facilitation
Genesis Energy	Partial	Partial
Greymouth Gas	Facilitation	Facilitation
OnGas (Vector)	Not provided	Full
Nova Energy	Not provided	Full
Mercury Energy (Mighty River Power)	Facilitation	Facilitation
Pulse Energy	Facilitation	Facilitation
Switch Utilities	Not provided	Not provided
Trustpower	Not provided	Partial

All Retailers Self-Assessment Forms submitted are provided in Appendix F.

Overall, the level and quality of Retailer participation in this year's exercise appears to be something of a mixed bag. This is evident not only from the self-assessment forms provided but also from a number of instances of Retailers using the incorrect compliance update forms and sending them to incorrect recipients. Few participants took the opportunity to actually contact consumers to verify that the contact details were correct or that the consumer understood their obligations.

In addition, there was a general lack of provision of curtailment compliance information during the exercise. The CCO's curtailment instructions issued at 10:15 required Retailers to provide the first update on level of compliance by 12:00 and then hourly. The TSO subsequently provided two compliance update summaries at 12:43 and 14:33 to the CCO which showed the following levels of compliance:

Consumer Band	Summary Update at 12:43	Summary Update at 14:33
Band 3	31%	31%
Band 4	14%	14%
Band 5	69%	85%
Band 6	30%	30%

A particular exception to this observation is OnGas. An exercise observer located at OnGas considered the Gas Information Exchange (GIX) portal utilized by them to be a very effective tool for communicating with, updating, and receiving responses from, consumers. OnGas sent its customer curtailment compliance report to the TSO within the required timeframe and were responsible for a significant portion of the “curtailment achieved” numbers in the above table.

Recommendations:

TSO and CCO to further review feedback from Retailers Self-Assessment Forms and investigate these issues further to establish whether further education or other steps (such as a review/audit) need to be explored in the area of Retailer and consumer compliance.

TSO to consider a “Retailer Activation” step in its procedures – getting Retailers to send through a test e-mail to Critical Compliance which confirms who their contact during the CC is and what e-mail address the updates will be coming from.

10.2 Ensure the Retailer curtailment plan contains 24/7 contact information for each consumer installation [r43]

All Retailer self-assessment forms received reported processes for holding emergency consumer contact details, with the exception of Pulse who only have domestic customers

10.3 Ensure the Retailer has up to date curtailment band information for each consumer [r43]

Retailers reported their consumers by band in both their self-assessment forms and in their updates during the exercise.

10.4 Confirm each Retailer has a process for keeping contact and curtailment band information up to date [r43]

Most of the self-assessment forms reported processes for keeping contacts and bands up to date.

10.5 Retailers and large consumers to provide regular updates to TSO [r55]

Some confusion from some Retailers was observed about where the updates should be sent (i.e. some sent this direct to the CCO). Refer Section 9.1 above.

10.6 Retailers to give urgent notice to their consumers affected by a CC direction [r56]

Retailers reported processes for making customer contact but only a minority of participants actually contacted consumers.

11. Asset Owners Exercise Test Criteria and Observations

11.1 The owner of the damaged or failed component publishes the required information [r54A]

First Gas was the affected asset owner in this exercise and relevant observations and recommendations have been incorporated in Section 8.7.

Appendix A – Exercise Interjects

Exercise Commences. 09:00am

1. CCO website message on Current CC Events

Date 22nd June 2016. Time: 09:00 Situation: Exercise Kakama has commenced

2. E-mail – to all CCO email addresses

Subject: Exercise Kakama – CCO annual exercise has commenced

The exercise has now commenced. All verbal and written exercise communications will be prefixed with "Exercise Kakama".

3. Txt – to all CCO txt addresses

Exercise Kakama has now commenced. All exercise communications will be prefixed with "Exercise Kakama".

TSO Interject #1 09:05am Interject Handed to Gas Controller

This is the 1st exercise interject from Exercise Control.

You have received a phone call from a contractor installing some fencing near the Waimahora Stream in Santoft Forest which is south of Turakina. One of his workers has struck a gas pipeline with a post hole borer. Gas is escaping.

From SCADA, Gas Control can see:

- Critical Contingency Pressure Threshold at Waitangirua is showing 15 hours to 37barg
- Critical Contingency Pressure Threshold at Hastings is showing 20 hours to 32barg

First Gas field crews were working in the area have been mobilised to site and an update on system conditions will be provided by 09:45am.

If there are any queries relating to this interject please refer them to the CCO Observer.

Reference Information:

Location of the damage is Lat: 40° 8'42.10"S Long: 175°11'11.75"E

Assumptions:

The Duty CCO for this event is Julie Langford. All communications from the TSO Duty Officer must be to Julie.

The TSO will respond in accordance with Communications Protocol using information above.

TSO to assume that the Duty CCO has not received this interject and can only act on information provided by the TSO Duty Officer.

Any questions or clarifications regarding the physical field response should be directed to the CCO Observer (Graham Alexander).

TSO Interject #2 09:45am Interject Handed to Gas Controller

This is the 2nd Interject from Exercise Control.

The TSO is now to assume the following:

- The pipeline isolated between mainline valves at Turakina MLV and Raumai Scraper Station.
- The damaged section of pipeline has de-pressurised and the site has been made safe.
- Investigations reveal that the post hole borer has punctured the top of the pipeline with a small hole some 5mm dia.
- The pipeline has not been dented or gouged and the damage can be repaired with a bolt-on repair clamp.
- Repair crews have been mobilised and return to service time is expected to be around 24 hours.

From SCADA, Gas Control can see:

- Critical Contingency Pressure Threshold at Waitangirua is now showing 9 hours to 37barg
- Critical Contingency Pressure Threshold at Hastings is now showing 10 hours to 32barg

An update on progress with repairs and system conditions will be available at 13:45pm

If there are any queries relating to this interject please refer them to the CCO Observer at Bell Block

Background information:

- The contractor had requested a permit for the work but commenced before First Gas staff had arrived at the site.
- There are no injuries.
- Emergency services responded to site.
- Weather conditions are fine and site access unrestricted.
- There are local reporters on-site.

TSO Interject #3 13:45 Interject Handed to Gas Controller

This is the 3rd Interject from Exercise Control.

Pipeline repairs have been completed and the section between Turakina MLV and Raumai Scraper Station has been fully re-commissioned.

Pipeline pressures are suitable to allow all demand to be re-instated.

This is the final interject.

Continue with the exercise until notified that the exercise has ended.

If there are any queries relating to this interject please refer them to the CCO Observer at Bell Block

Exercise Ends 15:30

1. CCO website message on Current CC Events

Date 22nd June 2016 Time: 15:30 Situation: Exercise Kakama has ended. Thanks to all participants.

Please could Retailers complete the self-assessment form at Appendix F of the Participants' Brief by Wednesday 6th July. Please send these to the CCO at cco@cco.org.nz

Any feedback from any other Participants' is welcome and can be sent to the same address.

2. E-mail – to all CCO email addresses

Subject: Exercise Kakama – CCO exercise has now ended

Date 22nd June 2016. Time: 15:30

Situation: Exercise Kakama has ended. Thanks to all participants.

All Participants' observations or feedback would be much appreciated.

Please send these to the CCO at cco@cco.org.nz

3. Txt – to all CCO txt addresses

Exercise Kakama has now ended. Thanks to all participants.

4. E-mail to Retailers

Subject: Exercise Kakama – Retailers Feedback

Please could Retailers complete the self-assessment form at Appendix F of the Participants' Brief by Wednesday 6th July. Please send these to the CCO at cco@cco.org.nz

Appendix B – Exercise Timeline

Exercise Control Log

Please note this is a summary only of events. Not every communication has been noted in this report.

Event:	Exercise Kakama	Date:	22/06/2016
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Time	From	To	Details
09:00	Exercise Control	All Participants	Exercise Kakama has commenced – email & SMS Website updated to reflect exercise commenced
09:03	Exercise Control	TSO GC	1 st Interject issued to Gas Control (GC). GC completed Incident Call Log Sheet and referred matter to Control Room Manager (CRM).
09:08	TSO GC	TSO CRM	CRM proposed actions: Check location on Maps to confirm if their asset; check pressures/demand on SCADA; plan to reduce pressure by 10%; advise Duty Officer (DO) and advise CCO of possible Potential CC.
09:10	TSO CRM	TSO DO	CRM briefed DO. DO advised declaring an emergency due to loss of containment report and instructed Gas Controller to activate Procedure 307704 to notify CCO.
09:12	TSO GC	CCO AMS	Request to CCO to call Gas Control ASAP.
09:14	AMS	CCO	Message to call Gas Control ASAP
09:16	CCO	TSO DO	CCO briefed on event. CCO informed that threshold not currently breached. TSO not certain of location of event (i.e. possibly on loop line) CCO advised CC can be declared in breach considered unavoidable. CCO advised that estimated time to repair would be needed and requested SCADA data be switched to Event Mode. TSO focused on identifying location of reported escape. Clarity provided by exercise control that gas escape was on section NOT looped. TSO concurred that pipeline isolation would be required therefore breach unavoidable.
09:30	CCO	TSO DO	CCO determines that breach of threshold unavoidable and gives urgent notice (oral) to TSO that Critical Contingency is now being declared at 09:30 on 22 June 2016 and written notice will be issued as soon as possible. CCO commences preparing CC Declaration Notice.
09:32	TSO DO	CCO	Received copy of TSO internal update #1
09:35	CCO	TSO DO	Printed copy of draft declaration notice issued for review. TSO concurs with content and initials.

Time	From	To	Details
09:37	CCO	TSO & Stakeholder	Declaration notice CC-0025 emailed to TSO & copied to Stakeholders.
09:40	CCO		Declaration notice CC-0025 published on website.
09:41	TSO (Scheduler)	Exercise Control	Query re Declaration Notice should be published as not in pdf format. Confirmed to change to pdf and publish.
09:45	CCO		0800 Information Line updated for declaration.
09:46	Exercise Control	TSO DO	2 nd Interject issued.
09:49	TSO	Interconnected Parties	OATIS (Maui) New Critical notice ID 32986 "Exercise Kakama - Critical Contingency Declaration Notice CC-0025" - Action Required
09:51	CCO	Stakeholders	SMS text advising CC-0025 has been issued.
09:51	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 32987 "Exercise Kakama: Critical Contingency Declaration Notice - CC-0025" - Action Required
09:53	TSO DO	CCO	DO briefs CCO. CCO requests latest SCADA Data File on USB stick. Estimated repair time 24 hours. Agreement to curtail to Band 6.
10:07	TSO DO	CCO	Received copy of TSO internal update #2
10:10	CCO	TSO DO	Printed copy of draft curtailment notice issued for review. TSO concurs with content and initials.
10:05	TSO CRM	CCO	SCADA Data File issued on USB stick.
10:15	CCO	TSO & Stakeholders	Curtailment notice CC-0026 emailed to TSO & copied to Stakeholders.
10:20	CCO		Curtailment notice CC-0026 published on website.
10:23	CCO	Stakeholders	SMS text advising CC-0026 has been issued.
10:25	CCO		0800 Information Line updated for curtailment.
10:29	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 32988 "Exercise Kakama: Direction to Curtail Demand Notice - CC-0026" - Action Required
10:52	Genesis	CCO	Supplied number of ICP's for each affected gate. Wrong addressee and used old template. CCO replied at 11:00am to correct.
10:57	Contact	CCO	Supplied Media statement prepared in accordance with the Gas Retailers Communications Protocol, which Contact leads in 2016. Media appeal had not been requested. Content of statement contradictory to CCO instruction.
11:10	Senate	CCO	Draft media statement sent to three CCO's but wrong email addresses used.

Time	From	To	Details
			Small errors in Draft statement otherwise reasonable.
11:16	TSO DO	CCO	Copy of First Gas Media Statement provided. No reference to Exercise Kakama. Errors in statement – no mention of pipeline to Wellington. No mention of Palmerston North. CEO's mobile phone number provided.
11:31	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 32989 "Exercise Kakama: Gas transmission pipe damage at Turakina" - Action Required
12:22	Nova Energy	CCO	Confirmation of contact to consumers. Sent to wrong addressee. CCO advised Nova of error and forwarded to CCO Liaison Officer.
12:35	CCO		Status Update notice CC-0027 published on CCO website
12:40	CCO	Stakeholders	Status Update notice CC-0027 emailed to Stakeholders & copied to TSO.
12:41	CCO	Stakeholders	SMS text advising CC-0027 has been published.
12:43	CCO Liaison	CCO	Summary of compliance from Retailers provided. CCO queried low level of 14% for Band 3.
12:47	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 32990 "Exercise Kakama; Critical Contingency Status Update Notice - CC-0027" - Action Required
12:51	CCO Liaison	CCO	Update on Retailers compliance.
13:57	TSO DO	CCO	Received copy of TSO internal update #4
14:01	CCO	TSO & Stakeholders	Restoration notice CC-0028 emailed to TSO & copied to Stakeholders.
14:05	CCO		Restoration notice CC-0028 published on website.
14:10	CCO	Stakeholders	SMS text advising CC-0028 has been issued.
14:10	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 32996 "Exercise Kakama - Direction to Restore Curtailed Demand notice CC-0028" - Action Required
14:15	CCO		0800 Information Line updated for restoration.
14:33	CCO Liaison	CCO	Updated summary of compliance from Retailers provided. Band 3 still low at 14%, Band 6 only 30%.
15:06	TSO DO	CCO	Copy of updated First Gas Media Statement provided. Previous errors corrected.
15:10	CCO	TSO & Stakeholders	Termination notice CC-0029 emailed to TSO & copied to Stakeholders.
15:14	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 33000 "Exercise Kakama: Lower North Island Gas Supplies Resumed" - Action Required
15:15	CCO		Termination notice CC-0029 published on website.
15:17	CCO	Stakeholders	SMS text advising CC-0029 has been issued.

Time	From	To	Details
15:19	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 33001 "Exercise Kakama - Critical Contingency Termination Notice CC-0029" - Action Required
15:21	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 33002 "Exercise Kakama; Critical Contingency Termination Notice CC-0029" - Action Required
15:33	Exercise Control	All Participants	Exercise Kakama has ended – email and SMS. Website updated to reflect exercise finished. 0800 Information Line updated

Appendix C – Notice Summary

All CCO notices can be viewed in full on www.cco.org.nz – Historical Events

All First Gas TSO notices can be viewed on www.oatis.co.nz – Vector Information Exchange, using ‘Notice Search’ button and begin date of 24/6/15

Notices to TSO

Time of e-mail to TSO	Notice ID	Notice Type	Time TSO Published CCO Notice	
			Maui OATIS	Vector OATIS
09:37	CC-0025	Critical Contingency Declaration Notice	09:49	09:51
10:15	CC-0026	Direction to Curtail Demand	N/A	10:29
12:40	CC-0027	Status Update Notice	N/A	12:47
14:01	CC-0028	Direction to restore curtailed demand	N/A	14:10
15:10	CC-0029	Termination of Critical Contingency	15:19	15:14



Media Release

22 June 2016

Gas transmission pipe damage at Turakina

The gas transmission pipeline south of Turakina in the North Island has been damaged by a third party resulting in a direction to curtail demand by the pipeline's operator, First Gas Ltd as instructed by the Critical Contingency operator.

While the damaged section of the 200mm pipe has been isolated, made safe and repairs are underway, the estimated time to repair will take in the vicinity of 24 hours, says the company's CEO, Paul Goodeve.

"This pipeline damage has resulted in gas supplies being cut off from the pipeline system south of Turakina, including the Marton Lateral pipeline and the pipeline supplying Hastings and the Hawkes Bay," explains Mr. Goodeve.

"The direction to curtail demand will affect consumers of gas in Wellington, Marton, Hastings and Hawkes Bay area. No other North Island regions will be affected."

There have been no injuries as a result of this incident, but First Gas advises the public and other contractors to stay well clear of the incident.

"From initial reports we understand the damage is not significant but repairs will take 24 hours to complete," says Mr. Goodeve. "We anticipate supply will be restored by midday tomorrow (23 June)."

ENDS

Media Enquiries

First Gas Ltd

Chief Executive – Paul Goodeve

Communications Manager – Bruce Gatward-Cook



Media Release

22 June 2016

EXERCISE KAKAMA

Lower North Island gas supplies resumed

Gas supplies to the lower North Island region have been resumed ahead of schedule following the repair to a gas transmission pipeline damaged by a third party south of Turakina in the North Island.

Following the damage reported early yesterday, a repair crew from the pipeline's owner and operator, First Gas Ltd, worked throughout yesterday and through the night to ensure gas supplies could be resumed earlier today, says the company's CEO, Paul Goodeve.

"As soon as the incident happened we reacted as quickly and as safely as possible to isolate the damage, and repair the pipeline," says Mr Goodeve. "We initially estimated needing 24 hours to repair the pipeline but have resumed gas supplies well ahead of that time frame."

The outage mainly affected commercial gas consumers south of Turakina to Wellington and east to Hastings.

"Compliance to the Critical Contingency Operator's request for these consumers to curtail gas demand meant no residential users were affected by the outage," says Mr. Goodeve.

"While we regret the impact this outage had on these consumers, the incident is a reminder to all parties considering working near pipelines to call 0800 800 393 or use the Dial Before You Dig website to locate pipelines, arrange permits to work and access help from our knowledgeable staff."

ENDS

Media Enquiries

First Gas Ltd

Chief Executive – Paul Goodeve

Communications Manager – Bruce Gatward-Cook

Media Statement received from Contact Energy on behalf of the Retailers who are part of the Retailers Communication Protocol

EXERCISE KAKAMA – Not a real world event

Media Statement

Critical Gas Contingency

22 June 2016

Gas outage - customers from Wellington to Hastings asked to conserve gas

This is a message for domestic and small commercial gas consumers.

An incident damaging the First Gas high pressure gas transmission pipeline South of Turakina has occurred this morning, and as a result domestic and commercial gas customers between Wellington and Hastings are asked to avoid using gas in order to help preserve pressure in the system while the damage can be assessed and a plan for repair formulated.

A further update on the expected timeframe for the resumption of normal gas use for domestic and small commercial gas consumers will be provided in due course.

First Gas, who operate the high pressure gas transmission pipeline, and the Critical Contingency Operator, who manage critical gas outages, are managing the response to situation and are also working directly with large industrial gas users to reduce their gas use.

This message is provided by the following retailers – Contact Energy, Energy Direct New Zealand, Energy On Line, Genesis Energy, Mercury Energy and Trustpower.

Issued by:

Shaun Jones
Head of Communications
Contact Energy

Appendix E – Retailer Compliance Updates Summary

First Retailer Compliance Summary update received by CCO from First Gas at 12:43

Pipeline Sub-system	% Compliance					Comments & Action Taken
	3	4	5	6	7	
Rotowaro	100%	100%	100%	100%	100%	
Morrinsville	100%	100%	100%	100%	100%	
Bay of Plenty	100%	100%	100%	100%	100%	
Maui	100%	100%	100%	100%	100%	
300 Line	100%	100%	100%	100%	100%	
KGTP North	100%	100%	100%	100%	100%	
KGTP South	31%	14%	69%	30%	100%	Retailer communication to end users to curtail is continuing

Second Retailer Compliance Summary update received by CCO from First Gas at 14:33

Pipeline Sub-system	% Compliance					Comments & Action Taken
	3	4	5	6	7	
Rotowaro	100%	100%	100%	100%	100%	
Morrinsville	100%	100%	100%	100%	100%	
Bay of Plenty	100%	100%	100%	100%	100%	
Maui	100%	100%	100%	100%	100%	
300 Line	100%	100%	100%	100%	100%	
KGTP North	100%	100%	100%	100%	100%	
KGTP South	31%	14%	85%	30%	100%	No further updates received for Bands 3, 4 & 6 Additional 2 ICPs were curtailed for Band 5

NOTE: This is based on the information that was received just prior to the notice to restore demand.

Appendix F – Retailer Self-Assessment Forms

Retailer Name	Contact Energy						
Exercise Participation Level *delete as appropriate	Facilitation						
1. Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.	Curtailment band 6 – we are in regular contact with. All other curtailment bands – We have alerts in place to ensure we collect/update emergency contact details.						
2. Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	Our communications team have pre-prepared templates that are ready to update and send out in case of emergency, which was sent to the CCO during Kakama.						
3. How often are emergency contact numbers reviewed or audited for completeness and accuracy?	Quarterly.						
4. How many affected consumers did you have in each band at each gas gate? Please include separate line for each gas gate.	Curtailment Band						
	3	3CP	4	4CP	5	6	7
Gas gate ASH34301						1	
Gas gate BEL24510			17			77	
Gas gate DAN05001			1			7	
Gas gate FLD03001	1		5			27	
Gas gate FOX22101						15	
Gas gate HST05210			39			96	
Gas gate LAB20201			1			1	
Gas gate LNB24301						2	
Gas gate LVN24401			6			46	
Gas gate MTN23801						3	
Gas gate OTA22601						9	
Gas gate PAU20101			6			29	
Gas gate PHT04901						6	

Gas gate PLN24201	1		9			108	
Gas gate TWA35610			64			274	
Gas gate WAK22802			2			7	
Gas gate WTG06910			4			33	
5. During the exercise how many affected consumers in each curtailment band did you give instructions to by urgent notice in accordance with regulation 56?	0	0	0	0	0	0	0
6. During the exercise how many affected consumers in each curtailment band did you advise that the critical contingency had been terminated in accordance with regulation 61(c)?	0	0	0	0	0	0	0
7. Description of methods, processes and procedures in place for issuing urgent notices in accordance with regulation 56.	Phone call and email follow-up if required. Tracking of contact made and response in SAP.						
8. Views/comments on the Retailer Compliance Update Form and process.	The form should be amended and have gas gate code in furthest left column rather than BPP pool.						
9. Description of methods processes and procedures for advising affected consumers of termination of critical contingency in accordance with regulation 61(c).	As per response to Q7.						
10. Views on levels of consumer understanding of your instructions and their obligation under regulation 57.	We have found a good level of understanding of instruction and requirements.						
11. Views on exercise format, lessons learnt and any planned future changes or initiatives you may take that were identified during the exercise.	It was good to have an actual run through to learn the process, and we are prepared in the case of a real emergency.						

Appendix F – Retailer Self-Assessment Report

Retailer Name	Energy Direct NZ Ltd (EDNZ)						
Exercise Participation Level *delete as appropriate	Facilitation						
1. Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.	<p>EDNZ keep a Master excel file where all non-domestic gas customers are listed with all relevant ICP and contact details.</p> <p>A fortnightly procedure reviews load shedding categories based on current annual load, recon group, load shedding category and ANZSIC industry codes. Updates are made as required to the Master file to keep this up to date from our system database and the Registry. All new active customers are added to the Master file and receive a letter advising them of the CCM plan and requesting contact details (this includes any new connections, new switch in customers and any current customers with reconnections). This is followed up if we don't receive a response, and details added as they are received.</p> <p>Designations are reviewed in a separate monthly procedure to find potential customers who may be eligible for designation 5 or 7 based on their ANZSIC industry codes. The Master file holds the record of letters sent to appropriate customers and follow ups to ensure designations are applied for where appropriate.</p>						
2. Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	Media appeals are managed by Trustpower on behalf of EDNZ (for the calendar years agreed in the Gas Retailer's Communications Protocol). EDNZ provides assistance or information to the community relations team on request during this time.						
3. How often are emergency contact numbers reviewed or audited for completeness and accuracy?							
4. How many affected consumers did you have in each band at each gas gate? Please include separate line for each gas gate.	Curtailment Band						
	3	3CP	4	4CP	5	6	7
Gas gate ASH34301						1	
Gas gate BEL24510	1		10			3	
Gas gate FLD03001			1			2	
Gas gate HST05210			9			13	
Gas gate LAB20201	1		1			5	

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			2			4	
Gas gate LVN24401			2			16	
Gas gate MTN238012			2				
Gas gate PAU20101	1		16			35	
Gas gate PLN24201			17		1	4	
Gas gate TWA35610			3			1	
Gas gate WWT G06910	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5. During the exercise how many affected consumers in each curtailment band did you give instructions to by urgent notice in accordance with regulation 56?	n/a	n/a	n/a	n/a	n/a	n/a	n/a
6. During the exercise how many affected consumers in each curtailment band did you advise that the critical contingency had been terminated in accordance with regulation 61(c)?	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7. Description of methods, processes and procedures in place for issuing urgent notices in accordance with regulation 56.	<p>Procedures are in place to create a Master workbook of all affected customers. A telephone script is created and team assembled to contact all customers. Customers are contacted in the order of smallest load shedding band to largest required to be curtailed, and within each band we prioritise shedding the customers with the largest annual load first.</p> <p>The Master workbook keeps records of the date, time and staff member who made initial contact with each customer.</p> <p>Email contact details and preference for further contact confirmed with the customer. Follow up attempts are made until each customer has been notified. A follow up email is sent to all customers contacted by phone to confirm all details in writing.</p>						
8. Views/comments on the Retailer Compliance Update Form and process.	This was easy to use, and instructions easy to follow.						
9. Description of methods processes and procedures for advising affected consumers of termination of critical contingency in accordance with regulation 61(c).	<p>A telephone script is created and team assembled to contact all customers in reverse order of largest load shedding band first. The Master workbook is updated with the date, time and staff member who has made contact with each customer. Follow up attempts are made until each customer has been notified by their preferred method of contact. A follow up email is sent to all customers contacted by phone to confirm all details in writing.</p>						

Participants' Brief – CCO 2016 Exercise

<p>10. Views on levels of consumer understanding of your instructions and their obligation under regulation 57.</p>	<p>EDNZ carried out this exercise as facilitation only on this occasion.</p> <p>However in general all non-domestic customers receive a letter advising them of CCM requirements and outlines the obligations of the retailer and customer in detail and each ICP is listed with the annual load and load shedding category. Updated letters are sent whenever load shedding categories change.</p>
<p>11. Views on exercise format, lessons learnt and any planned future changes or initiatives you may take that were identified during the exercise.</p>	<p>It is our opinion that the exercise format was well thought out, and closely followed the expected format of a real event. It would have been interesting to have curtailment of bands incrementally throughout the morning.</p>

Retailer Name	Genesis Energy
Exercise Participation Level *delete as appropriate	Partial *
1. Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.	All emergency contact details are in Gentrack, our internal reporting extracts this information when required
2. Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	We will follow the directions from the retailer's communication protocol if adequate. Alternatively we can implement various forms of media release applicable to the contingency i.e. radio/TV/Newspaper/Facebook/Twitter.
3. How often are emergency contact numbers reviewed or audited for completeness and accuracy?	Annually and every 2 years we send out the consumer notice as part of the GIC requirements.
4. How many affected consumers did you have in each band at each gas gate? Please include separate line for each gas gate.	

Gas Gate	Curtailment Bands				Total
	3	4	5	6	
ASH34301	0	0	0	1	1
BEL24510	6	24	2	270	302
DAN05001	0	0	0	2	2
FLD03001	0	4	0	18	22
FOX22101	0	1	0	5	6
HST05210	2	19	0	47	68
LAB20201	0	0	0	1	1
LNB24301	1	0	1	1	3
LVN24401	0	1	1	24	26
MNG34001	0	0	1	0	1
MTN23801	0	0	0	4	4
OTA22601	0	1	0	19	20
PAH23201	0	0	0	1	1
PAU20101	0	2	0	81	83
PHT04901	0	0	0	1	1
PLN24201	0	15	1	125	141
THO22701	0	0	0	1	1
TWA35610	7	38	2	215	262
WAK22802	2	0	0	30	32
WTG06910	0	5	2	74	81

Total	18	110	10	920	1058
5. During the exercise how many affected consumer's in each curtailment band did you give instructions to by urgent notice in accordance with regulation 56?	6				
6. During the exercise how many affected consumer's in each curtailment band did you advise that the critical contingency had been terminated in accordance with regulation 61(c)?	0				
7. Description of methods, processes and procedures in place for issuing urgent notices in accordance with regulation 56.	Txt/Phone/Email/Media				
8. Views/comments on the Retailer Compliance Update Form and process.	None				
9. Description of methods processes and procedures for advising affected consumers of termination of critical contingency in accordance with regulation 61(c).	Txt/Phone/Email/Media				
10. Views on levels of consumer understanding of your instructions and their obligation under regulation 57.	None				
11. Views on exercise format, lessons learnt and any planned future changes or initiatives you may take that were identified during the exercise.	Our internal communications needs improvement; external communications to the affected network went well. Our customers appreciated the calls and prompted them to update their own contingency plans				

Appendix F – Retailer Self-Assessment Report

Retailer Name	Greymouth Gas New Zealand Limited						
Exercise Participation Level	Facilitation *						
1. Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.	Phone call or email.						
2. Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	Domestic customers will be contacted individually by phone.						
3. How often are emergency contact numbers reviewed or audited for completeness and accuracy?	Periodically, but at least annually.						
4. How many affected consumers did you have in each band at each gas gate? Please include separate line for each gas gate.	Curtailment Band						
	3	3CP	4	4CP	5	6	7
Feilding	1						
Maingataikoka	1						
Belmont	1						
5. During the exercise how many affected consumers in each curtailment band did you give instructions to by urgent notice in accordance with regulation 56?	n/a*	n/a*	n/a*	n/a*	n/a*	n/a*	n/a*
6. During the exercise how many affected consumers in each curtailment band did you advise that the critical contingency had been terminated in accordance with regulation 61(c)?	n/a*	n/a*	n/a*	n/a*	n/a*	n/a*	n/a*
7. Description of methods, processes and procedures in place for issuing urgent notices in accordance with regulation 56.	Phone call and email – in either order.						
8. Views/comments on the Retailer Compliance Update Form and process.	The notices sent by the TSO were unclear as they simply forwarded on the notices from the CCO – leaving emergency responders with some unnecessary information to process before getting the actual message.						
9. Description of methods processes and procedures for advising affected consumers of termination of critical contingency in accordance with regulation 61(c).	Phone call and email – in either order.						
10. Views on levels of consumer understanding of your instructions and their obligation under regulation 57.	n/a*						
11. Views on exercise format, lessons learnt and any planned future changes or initiatives you may take that were identified during the exercise.	The exercises are worthwhile – but there are many improvements to be made (particularly for TSOs) for the process to work efficiently.						

Retailer Name	Vector (On Gas)						
Exercise Participation Level *delete as appropriate	Full						
1. Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.	Annual checks in our GIX (Gas Information Exchange) system. We review our SOP every 3 months and the contact details in that are checked as well.						
2. Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	Appeals will be sent through the GIX system. Customers who don't respond are followed up with a phone call.						
3. How often are emergency contact numbers reviewed or audited for completeness and accuracy?	Annually and after each exercise.						
4. How many affected consumers did you have in each band at each gas gate? Please include separate line for each gas gate.	Curtailment Band						
	3	3CP	4	4CP	5	6	7
BEL24510	4		5		1	4	
DAN05001	1						
HST05210	10		2				
HWA20801	1						
LVN24401	2						
LNB24301	3						
MTN23801	1						
PLN24201	5		9			5	
TWA35610	2		30				
WAG21501	6						
5. During the exercise how many affected consumers in each curtailment band did you give instructions to by urgent notice in accordance with regulation 56?	35		46		1	9	
6. During the exercise how many affected consumers in each curtailment band did you advise that the critical contingency had been terminated in accordance with regulation 61(c)?	35		46		1	9	
7. Description of methods, processes and procedures in place for issuing urgent notices in accordance with regulation 56.	A bulletin is posted on our GIX system, customers are notified of this alert through an email and text message. Our larger customers ie Kinleith mill are notified by a phone call.						
8. Views/comments on the Retailer Compliance Update Form and process.	It's user friendly and easy to use to report the data quickly.						

9. Description of methods processes and procedures for advising affected consumers of termination of critical contingency in accordance with regulation 61(c).	A notice is posted in our GIX system consumers are sent an email and a text is sent alerting them to the notification.
10. Views on levels of consumer understanding of your instructions and their obligation under regulation 57.	Our consumers have a wide understanding of their obligation. This is discussed with them and reviewed. We have always had a good uptake of consumers participating in practice exercises.
11. Views on exercise format, lessons learnt and any planned future changes or initiatives you may take that were identified during the exercise.	We are doing a full review of consumption and curtailment bands. Also our template in the GIX will be updated so we can comply with the TSO report quicker. We are reviewing our SOP after the exercise.

Retailer Name	Nova Energy Limited																																																																																																																																																																																																																																																														
Exercise Participation Level *delete as appropriate	Full *																																																																																																																																																																																																																																																														
1. Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.	Listings obtained from billing system, and emailed/mailed requests sent to consumers to confirm details are correct, or alterations required on these details held. Mass check sent-out to consumers bi-annually, otherwise updated as and when advised by consumer during normal customer contact processes																																																																																																																																																																																																																																																														
2. Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	Passed onto our Media Manager/ Marketing Manager, who will utilise their communications contacts within the media formats. Any such CCO message would be passed through for transmission.																																																																																																																																																																																																																																																														
3. How often are emergency contact numbers reviewed or audited for completeness and accuracy?	See 1 above																																																																																																																																																																																																																																																														
4. How many affected consumers did you have in each band at each gas gate? Please include separate line for each gas gate.	Curtailment Band																																																																																																																																																																																																																																																														
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	3	3CP	4	4CP	5	6	7
5. During the exercise how many affected consumers in each curtailment band did you give instructions to by urgent notice in accordance with regulation 56?	5 by telephone comms ; all also set up to test stage – did not send		Set up to test stage – did not send		Set up to test stage – did not send	Set up to test stage – did not send	
6. During the exercise how many affected consumers in each curtailment band did you advise that the critical contingency had been terminated in accordance with regulation 61(c)?	Set up to test stage – did not send		Set up to test stage – did not send		Set up to test stage – did not send	Set up to test stage – did not send	
7. Description of methods, processes and procedures in place for issuing urgent notices in accordance with regulation 56.	<ol style="list-style-type: none"> 1) Obtain listing of all consumers on the affected gas gates 2) Set data set into load bands, and annual usage 3) For Band 3 and large consumers Band 4(greater than 5000GJpa, provide list to account managers and seconded staff to telephone contacts. 4) For all the above, plus remaining consumers, a multiple recipient email set up advising the CCO details of the emergency and associated requests for the specified bands to curtail gas consumption. This linked to the consumer contact data details obtained from billing system; emailed out, plus reporting back on those who open their email. 						
8. Views/comments on the Retailer Compliance Update Form and process.	Provides detailed overview of number of users per gate. Nova's EMO was not aware this was required to be sent back. Noted the instruction "Demand Curtailment Compliance Updates Frequency: 1st update by 12:00 midday then hourly", but thought this was communications coming back to him. Consider this instruction be made clearer and the requirement is for the retailer completed and returned.						

9. Description of methods processes and procedures for advising affected consumers of termination of critical contingency in accordance with regulation 61(c).	<i>This would be the same as paragraphs 3) and 4) in 7. above</i>
10. Views on levels of consumer understanding of your instructions and their obligation under regulation 57.	This was based on the telephone contact discussions for Band 3 consumers. Provided the initial discussion covered this was an exercise, the majority of those contacted understood what was being asked of them. Others contacts not previously involved in the similar gas industry events or exercises did require more details on what the exercise was about and hence the length of contact time was expanded.
11. Views on exercise format, lessons learnt and any planned future changes or initiatives you may take that were identified during the exercise.	<p>Format was good, and due to senior managers being offsite during this exercise, a number of new personal had to “front up” on the senior roles.</p> <p>Lessons learnt</p> <ul style="list-style-type: none"> • Make staff aware they could be seconded onto this work for an event/ exercise in future and their requirements to be able to assist with such an event. • Closer liaison with our IT to speed up processing of the communication channels • Review of other media to provide updating information – ie websites • Data download was not as complete as required for fast communication to all consumers’ parties. A request to confirm details is required and is due under the regulations.

Retailer Name	Mercury Energy						
Exercise Participation Level *delete as appropriate	Facilitation						
1. Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.	Annual contact due to low numbers						
2. Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	Gas Retailers Communications Protocol						
3. How often are emergency contact numbers reviewed or audited for completeness and accuracy?	Small Commercial Customers are contacted once per year to ensure details are correct. Residential customers are asked if their contact details have changed when they call						
4. How many affected consumers did you have in each band at each gas gate? Please include separate line for each gas gate.	Curtailment Band						
	3	3CP	4	4CP	5	6	7
Gas gate A	0	0	0	0	0	0	0
Gas gate B	0	0	0	0	0	0	0
Gas gate C	0	0	0	0	0	0	0
Gas gate D	0	0	0	0	0	0	0
Gas gate E	0	0	0	0	0	0	0
Gas gate F	0	0	0	0	0	0	0
Gas gate ...							
5. During the exercise how many affected consumers in each curtailment band did you give instructions to by urgent notice in accordance with regulation 56?	0	0	0	0	0	0	0
6. During the exercise how many affected consumers in each curtailment band did you advise that the critical contingency had been terminated in accordance with regulation 61(c)?	0	0	0	0	0	0	0
7. Description of methods, processes and procedures in place for issuing urgent notices in accordance with regulation 56.	Not Applicable as Mercury only has Residential Customers in this area.						

8. Views/comments on the Retailer Compliance Update Form and process.	Not Applicable as Mercury only has Residential Customers in this area.
9. Description of methods processes and procedures for advising affected consumers of termination of critical contingency in accordance with regulation 61(c).	Not Applicable as Mercury only has Residential Customers in this area.
10. Views on levels of consumer understanding of your instructions and their obligation under regulation 57.	Not Applicable as Mercury only has Residential Customers in this area.
11. Views on exercise format, lessons learnt and any planned future changes or initiatives you may take that were identified during the exercise.	

Retailer Name	Pulse Energy Alliance LP						
Exercise Participation Level *delete as appropriate	Facilitation *						
1. Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.	N/A we only supply domestic consumers						
2. Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	Pulse is a signatory to the Gas Retailers Communications Protocol						
3. How often are emergency contact numbers reviewed or audited for completeness and accuracy?	At least Annually						
4. How many affected consumers did you have in each band at each gas gate? Please include separate line for each gas gate.	Curtailment Band						
	3	3CP	4	4CP	5	6	7
Gas gate A	Not Applicable						
Gas gate B	Not Applicable						
Gas gate C	Not Applicable						
Gas gate D	Not Applicable						
Gas gate E	Not Applicable						
Gas gate F	Not Applicable						
Gas gate ...	Not Applicable						
5. During the exercise how many affected consumers in each curtailment band did you give instructions to by urgent notice in accordance with regulation 56?	Not Applicable						
6. During the exercise how many affected consumers in each curtailment band did you advise that the critical	Not Applicable						

contingency had been terminated in accordance with regulation 61(c)?							
7. Description of methods, processes and procedures in place for issuing urgent notices in accordance with regulation 56.	Media releases via Retailers Communications Protocol						
8. Views/comments on the Retailer Compliance Update Form and process.							
9. Description of methods processes and procedures for advising affected consumers of termination of critical contingency in accordance with regulation 61(c).	Via Retailers Communications Protocol						
10. Views on levels of consumer understanding of your instructions and their obligation under regulation 57.	N/A						
11. Views on exercise format, lessons learnt and any planned future changes or initiatives you may take that were identified during the exercise.							

Retailer Name	Trustpower						
Exercise Participation Level *delete as appropriate	Partial						
1. Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.	Monthly review of correct curtailment bands, and annual review of customer contact details.						
2. Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	As per Gas Retailers Communications Protocol – Critical Contingency.						
3. How often are emergency contact numbers reviewed or audited for completeness and accuracy?	Annual at minimum.						
4. How many affected consumers did you have in each band at each gas gate? Please include separate line for each gas gate.	Curtailment Band						
	3	3CP	4	4CP	5	6	7
ASH34301	0	0	0	0	0	0	0
BEL24510	0	0	2	0	0	4	0
DAN05001	0	0	0	0	0	0	0
FLD03001	0	0	0	0	0	0	0
FLH21901	0	0	0	0	0	0	0
FOX22101	0	0	0	0	0	0	0
HST05210	0	0	1	0	0	0	0
HST05203	0	0	0	0	0	0	0
KRG24101	0	0	0	0	0	0	0
KKI23701	0	0	0	0	0	0	0
KUK22401	0	0	0	0	0	0	0
LAB20201	0	0	0	0	0	0	0
LVN24401	0	0	0	0	0	1	0
LNB24301	0	0	0	0	0	0	0
MNG34001	0	0	0	0	0	0	0
MGK05401	0	0	0	0	0	0	0
MTN23801	0	0	0	0	0	1	0
ORD24701	0	0	0	0	0	0	0
OTA22601	0	0	0	0	0	0	0
PHT04901	0	0	0	0	0	0	0
PHT04902	0	0	0	0	0	0	0
PLN24201	0	0	1	0	0	3	0
PAU20101	0	0	0	0	0	3	0
PAH23201	0	0	0	0	0	0	0
PAH23101	0	0	0	0	0	0	0
TKP05101	0	0	0	0	0	0	0
TWA35610	0	0	1	0	0	3	0

TWB24810	0	0	0	0	0	0	0
THO22701	0	0	0	0	0	0	0
WAK22802	0	0	0	0	0	1	0
WTG06910	0	0	0	0	0	3	0
Total	0	0	5	0	0	19	0
5. During the exercise how many affected consumers in each curtailment band did you give instructions to by urgent notice in accordance with regulation 56?	0	0	0	0	0	0	0
6. During the exercise how many affected consumers in each curtailment band did you advise that the critical contingency had been terminated in accordance with regulation 61(c)?	0	0	0	0	0	0	0
7. Description of methods, processes and procedures in place for issuing urgent notices in accordance with regulation 56.	<p>Notification of Contingency comes through to our 24 hour Operations centre, where their procedure is to send out a text message to a defined distribution list, including, but not limited to the Wholesale Market Manager, and the Commercial Sales Manager. They also call the Wholesale Market Manager to confirm that the notification has been received. A decision is made as to the customers to contact, and appropriate account managers are informed to contact and direct customers consumption to cease. This is to be followed up with email including the notice from the CCO. Further phone calls as required are made to ensure consumption is ceasing promptly, and the customer is kept fully informed.</p> <p>In the case that the customer is not acknowledging our communications, or not curtailing, we have a process in place to send a Trustpower representative out to their site to explain in person the implications of non-compliance.</p>						
8. Views/comments on the Retailer Compliance Update Form and process.	None. Communication is clear.						
9. Description of methods processes and procedures for advising affected consumers of termination of critical contingency in accordance with regulation 61(c).	Similar to question 7, but in reverse. We phone and email to advise that consumption can resume as they deem necessary.						
10. Views on levels of consumer understanding of your instructions and their obligation under regulation 57.	Moderate. Our sign up process outlines the consumers obligations under a Critical Contingency, and all account managers have been trained as to the implications of a Critical Contingency, and the impacts this will have on a customer, with particular attention to non-compliance of a direction.						

11. Views on exercise format, lessons learnt and any planned future changes or initiatives you may take that were identified during the exercise.	None.
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