

CRITICAL CONTINGENCY OPERATOR



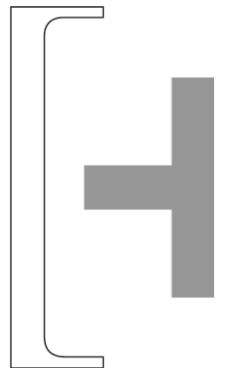
ANNUAL INDUSTRY EXERCISE 2024

“Exercise Hanguru”

Test of the First Gas Ltd Critical Contingency Management Plan

Prepared in accordance with the Gas Governance (Critical Contingency Management) Regulations 2008

June 2024



CONTENTS

1. Introduction	2
2. Executive Summary	3
3. Exercise Implementation	4
4. Exercise Scenario	4
5. Summary of Assessment against Test Criteria	4
6. Recommendations	6
7. TSO Exercise Test Criteria and Observations	8
8. CCO Exercise Test Criteria and Observations	13
9. Retailers and Large Consumers Exercise Test Criteria & Observations	16
10. Asset Owners Exercise Test Criteria and Observations	22

Appendix A – Exercise Injects

Appendix B – Exercise Event Log

Appendix C – Notice Summary

Appendix D - Asset Owner Public Statements and GIC Media Releases

Acknowledgment

The success of this 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.

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 exercises to test that:

- the Critical Contingency Management Plan (CCMP) complies with regulation 25 and gives effect to the purpose of the regulations; and
- the contact details included in the CCMP in accordance with regulation 25 are current; and
- the list of emergency contact details maintained by retailers in accordance with regulation 43 is current.

After the exercise, regulation 34 also requires that:

- a) within 10 business days of the exercise the Transmission System Owner (TSO) must provide a report to the CCO that:
 - explains why its CCMP does or does not comply with regulation 25 and gives effect to the purpose of the regulations; and
 - identifies areas in which its CCMP can be improved: and
 - recommends any CCMP amendments that should be made.
- b) within 10 business days of receiving the TSO report, the CCO must provide a report to the industry body that:
 - assesses the effectiveness of the CCMP; and
 - evaluates any amendments to the CCMP recommended by the TSO; and
 - identifies any amendments to the regulations, CCMP, communications plan or information guide that would improve that instruments effectiveness in achieving the purpose of the regulations.

A test exercise, “Exercise Hanguru” was carried out on 15 May 2024. The exercise required the CCO, TSO and retailers, large consumers and producers to carry out tasks and activities associated with the regulations, CCMP and other relevant documents.

The inputs for this report on Exercise Hanguru include:

- the CCO’s pre-test exercise audit of Firstgas
- the Event Log of the activities on the day of the exercise
- Firstgas’ post exercise report
- the self-assessment forms and feedback from retailers
- feedback from other participants
- the CCO’s observations

2. Executive Summary

Exercise Hanguru 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 was completed successfully and tested the core critical contingency phases and information flows associated with an event, such as declaration, demand curtailment and public information statements. Large consumers and retailers were issued with curtailment instructions and provided consumer compliance updates.

This year's scenario was a 'non-regional' event which impacted producers, large consumers and retailers as well as testing the Firstgas back-up plan for contacting stakeholders.

Evidence from this exercise demonstrated that:

- Firstgas has a good understanding of its role and responsibilities for critical contingency events. New emergency procedures implemented last year have been bedded-in and processes ran more smoothly than the exercise last year.
- Firstgas has an effective plan for communicating with stakeholders in the event they lose their primary system.
- Retailers are prepared to respond to a critical contingency and have processes and systems in place.
- Large Consumers affected by the exercise scenario demonstrated a good understanding of their responsibilities for critical contingency events.
- Producers affected by the exercise scenario responded to the obligations on asset owners to communicate about failed assets, but there was some confusion about the fit with the Gas (Facilities Outage Information Disclosure) Rules 2022.

The CCO concludes that overall, the industry demonstrated that it is prepared and able to respond to a critical contingency event.

With respect to regulation 34, the CCO concludes from this exercise that:

- the CCMP complies with regulation 25 and is effective in achieving the purpose of the regulations; and
- the CCMP contains the contact details required by regulation 25 and that they are current; and
- the list of emergency contact details maintained by retailers in accordance with regulation 43 is current.

Consequently, the CCO considers that no amendments to the regulations, CCMP, communications plan or information guide are required because of this exercise.

However, this report makes recommendations in Section 6 which, if fully implemented, would improve the efficiency of processes and procedures to support application of the CCMP.

3. Exercise Implementation

A Participants Brief for the exercise was issued to all participants on 1st March 2024. This Brief provided information on how the exercise would be structured and managed; the level of participation required for the exercise and the test objectives of the exercise.

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

4. Exercise Scenario

The exercise scenario was designed and managed by the CCO. The scenario centred on unplanned outages at the Oaonui and Kupe Production Stations following an earthquake. Gas demands were high due to cold weather and the Maui pipeline linepack level was reduced due to the unavailability of the Mokau Compressor Station. As a result, the Kapuni Gas Treatment Plant pressure threshold was breached. This required a non-regional curtailment down to band 4 at all gas gates.

The exercise required the CCO, Firstgas and stakeholders to carry out tasks and activities associated with the regulations, CCMP and other relevant documentation.

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

Observation:

- *Firstgas observed that the end to exercise injects was communicated by the CCO while compliance updates from the TSO were still required*

Recommendation:

- *Discuss details with the CCO about how injects later in the exercise are communicated*

5. Summary of Assessment against Test Criteria

5.1. CCO Assessment

The exercise was completed successfully and tested the core critical contingency phases and information flows associated with an event including:

- Firstgas was issued with curtailment instructions and revised demand curtailment instructions for large consumers and retailers.
- The CCO liaised with the Electricity System Operator who assessed the impact of curtailment on gas-fired electricity generation.
- The affected asset owners provided a public statement relating to the failed asset.
- The CCO provided a public statement.
- Large consumers and retailers provided curtailment updates.

The CCO's overall observations from the exercise include:

- Firstgas has a good understanding of its role and responsibilities for critical contingency events. New emergency procedures implemented last year have been bedded-in and processes ran more smoothly than the exercise last year.
- Retailers are prepared to respond to a critical contingency and have processes and systems in place. Feedback showed they were considering process improvements including the use of messaging systems and prioritising contact by gas consumption and they are encouraged to continue down that path.
- Large Consumers affected by the exercise scenario demonstrated a good understanding of their responsibilities for critical contingency events. The exercise demonstrated a need to review the content of the Huntly Power Station designation.
- Producers affected by the exercise scenario responded to the obligations set out in regulation 54A on asset owners to communicate information about failed assets. However, there was confusion about the fit with the Gas (Facilities Outage Information Disclosure) Rules 2022.

The CCO concludes that overall, the industry demonstrated that it is prepared and able to respond to a critical contingency event.

With respect to regulation 34, the CCO concludes from this exercise that:

- the CCMP complies with regulation 25 and is effective in achieving the purpose of the regulations; and
- the CCMP contains the contact details required by regulation 25 and that they are current; and
- the list of emergency contact details maintained by retailers in accordance with regulation 43 is substantially current.

Consequently, the CCO considers that no amendments to the regulations, CCMP, communications plan or information guide are required because of this exercise.

However, this report makes recommendations in Section 6 which, if fully implemented, would improve the efficiency of processes and procedures to support application of the CCMP.

5.2. TSO Assessment

Pursuant to section 34(5) of the regulations, Firstgas is required to provide a report to the CCO within 10 Business Days of the completion of a critical contingency test exercise that:

- a. Explains how the Firstgas CCMP meets or does not meet the test criteria in section 34(1) of the regulations.
- b. Identifies areas in which the Firstgas CCMP can be improved.
- c. Recommends any amendments Firstgas considers should be made to the CCMP.
- d. Provides any other information that Firstgas considers appropriate.

Firstgas submitted this report to the CCO on 29 May 2024.

Firstgas considers that the Firstgas CCMP complies with regulation 25 and when implemented during the test exercise gave effect to the purpose of the regulations.

Firstgas reported that the test exercise and the required pre-exercise audit have identified some valid observations and opportunities for improvement. However, the TSO does not consider that the issues, opportunities, and outcomes resulting from Exercise Hanguru reach the threshold for requiring amendments to the Firstgas CCMP. Instead, Firstgas will proceed to review and make amendments to its supplementary critical contingency documentation where required and provide on-going training to relevant staff involved in these processes, to address the observations and recommendations set out in Section 8 of their report and any made through the CCO's reporting process.

6. Recommendations

The following is a summary of the CCO recommendations arising from this exercise:

#	Section	Recommendation	Responsible
1	4	Discuss details with the CCO about how injects later in the exercise are communicated	Firstgas and CCO
2	7.1.1	Firstgas should work to provide the CCO with real-time access to SCADA.	Firstgas
3	7.1.1	Update Firstgas Document, 09456 Critical Contingency Pipeline Thresholds Overview to align with changes to Schedule 1 of the CCM regulations.	Firstgas
4	7.4	CCO should address all communications to the Intelligence, EMTL and BBK Control Room emails.	CCO

#	Section	Recommendation	Responsible
5	7.4	<i>CCO should update the Communications Protocol to reflect the new @clarus.co.nz email addresses.</i>	CCO
6	8.2	<i>GIC to continue to undertake the revision of the Guidelines for determining regional critical contingencies.</i>	GIC
7	8.3	<i>The CCO and Firstgas work together to explore ways of streamlining the notice process.</i>	CCO and Firstgas
8	8.3	<i>The CCO to consider always including a specific time for compliance updates, supplemented with an instruction such as “then every 2-hours from this time” in revised demand curtailment notices.</i>	CCO
9	8.3	<i>Highlight what has changed on revised curtailment notices to make the changes easier to identify.</i>	CCO
10	9.4	<i>Genesis reconsiders its current electricity supply designation for Huntly Power Station in conjunction with Gas Industry Company.</i>	Genesis & GIC
11	9.5	<i>Firstgas continue to work with retailers and large consumers to ensure that they understand curtailment compliance processes and expectations.</i>	Firstgas
12	9.5	<i>Explore process improvements/training opportunities to streamline the email traffic received by the CCO associated with compliance updates.</i>	Firstgas & CCO
13	9.6	<i>The GIC organise a meeting of media representatives from retailers, Firstgas and other asset owners to review how they work together to supply efficient and cohesive public information in the event of a critical contingency.</i>	GIC
14	10.1	<i>Provide feedback to OMV and Beach regarding the separate requirements of the CCM Regulations relating to asset owner statements over and above those of the Gas (Facilities Outage Information Disclosure) Rules 2022.</i>	CCO

7. TSO Exercise Test Criteria and Observations

7.1. Pre-Exercise Audit of Firstgas by CCO

The pre-exercise elements were audited on the 8 May 2024 (one week prior to the actual exercise date). All items were audited with the Firstgas Senior Commercial Advisor Transmission, Senior Transmission Scheduler and Manager, Integrated Control Room.

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

Thresholds

Firstgas Document, 09456 Critical Contingency Pipeline Thresholds Overview describes the current pressure thresholds. This document is due for annual review in January 2025. It requires updating to reflect removal of the Taupo DP and Broadlands DP pressure thresholds associated with the urgent regulations change.

Scada System Alarms

The pressure threshold alarm settings were checked on the SCADA system and found to be correct as detailed in the following table:

Measurement Point	Threshold		SCADA As Found		SCADA As Left	
	Pmin	Hours	Low	Critical Low	Low	Critical Low
Rotowaro	30.0	3	7	3	As found	As found
Westfield	37.5	6	8	6	As found	As found
Waitangirua	37.0	10	12	10	As found	As found
Hastings	30.0	5	7	5	As found	As found
KGTP	35	3	4	3	As found	As found
Gisborne	30.0	5	7	5	As found	As found
Reporoa	30.0	5	7	5	As found	As found
Tauranga	30.0	5	7	5	As found	As found
Whakatane	30.0	5	7	5	As found	As found
Cambridge	30.0	5	7	5	As found	As found
Whangarei	27.5	5	7	5	As found	As found

Alarms have also been established for all other gas gates on SCADA and a sample of these were also viewed and found to be correct.

Observation:

- *The new SCADA system, which will allow CCO real-time access has been delayed from Q3 2024 to Q4 2024/Q1 2025.*

Recommendation:

- *Firstgas should work to provide the CCO with real-time access to SCADA*

Threshold information to CCO

The CCO confirmed that the threshold information was being received reliably. It was also confirmed that the data being sent to the CCO was the same SCADA reference as that being viewed by Firstgas by comparing the CCO model against the Control Room screen.

Recommendation:

- *Update Firstgas Document, 09456 Critical Contingency Pipeline Thresholds Overview to align with changes to Schedule 1 of the CCM regulations.*

7.1.2. 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 contains description of the events that Firstgas considers may feasibly result in a breach of the thresholds and it includes explanation of situations or occasions where thresholds may be breached for short durations due to high demand or system flow changes (i.e. transient conditions). These were considered by all parties to the audit to appropriately reflect likely events.

The latest version of the CCMP (v14) was approved in March 2024. The changes focused on the removal of the Taupo and Broadlands pressure thresholds, otherwise there were only minor changes such as contact details.

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

The CCMP refers to the Pipeline Emergency Response Plans and associated Specific Event Guides for the management of pipeline emergencies.

The CCMP states that the emergency response capability is tested and evaluated by either a trial exercise or training exercise on a regular basis.

Firstgas carries out regular tests. Their last test was carried out on Thursday 2 May 2024.

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

The contacts are listed in Appendix 4 of the CCMP. Section 3.2 of the current CCMP states that:

The operational contact details for these groups are contained in OATIS. OATIS stores contact details by contact group and party. Members of the target audience who are regular users of OATIS (e.g. Shippers, Maui Pipeline Interconnected Parties etc.) have separate OATIS contact groups from those who do not use OATIS regularly (e.g. gas distributors, retailers etc.). This enables Firstgas to send notifications (via SMS and e-mail) to each relevant OATIS contact group when necessary. Parties that have access to OATIS have the responsibility for ensuring that their contact details in OATIS are current. Reminders for these parties to check and confirm, or advise of changes to, their contact details in OATIS will be sent by email on a monthly basis. For parties that do not have access to OATIS, and any changes not caught by the monthly check by parties with OATIS access, Firstgas will check/update all contact details every six months or at other times considered appropriate by Firstgas.

Firstgas recently published a document titled OATIS Contacts Management – General Overview to explain how contact details can be kept up to date. They also have a regular process for downloading the contact details held, splitting them by organisation and sending them to a main contact at each organisation to be checked. Parties that are slow to respond are followed up. Firstgas also send out a regular OATIS notice to remind people of the need to keep contact details up to date. They had recently confirmed that at least one contact for each relevant organisation is currently held in the system.

Firstgas provided the CCO with a copy of the latest OATIS contacts. It was confirmed that the database included contacts for all relevant organisations.

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

Section 5.4 and 5.5 of the CCMP details the demand curtailment and restoration processes.

The demand curtailment applied in the exercise was consistent with the process outlined in the CCMP.

In this exercise, the CCO elected to not test the demand restoration processes due to the nature of the scenario.

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

Section 3.3.1 of the CCMP states that all notices issued by Firstgas in accordance with the CCMP will be published:

- on OATIS as a ‘public’ notice.
- in a PDF format.
- using the proforma templates set out in the CCO Communications Plan.
- within 30-minutes of receiving them from the CCO.

- with an accompanying email and SMS notification to those stakeholders' set-up to receive such notifications in OATIS.

At 10:59, Firstgas was notified that for the purposes of the exercise, the TSO is to assume that:

- OATIS has had an unplanned outage, cause unknown. No aspects of the system are functioning.
- OATIS should be presumed to be unavailable for the remainder of the exercise.
- The TSO should initiate its DR plan and communicate to stakeholders what to expect.
- The stakeholder communication should ensure it is clear that the OATIS failure only relates to the exercise and remains available for BAU non-exercise activities.

Section 3.3.2 of the CCMP details the communication of notices if OATIS is unavailable.

Firstgas has developed PC-based functionality that will send all customers and stakeholders who have contact details stored in OATIS an email (including attachments) and SMS notification if OATIS is unavailable. This method was successfully and seamlessly deployed for all communications with the customers and stakeholders listed in Appendix 4 of the Firstgas CCMP once the interject on OATIS' unavailability was received. Notices sent this way included the revised curtailment direction as well as the CCO's status update.

7.4. 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)]

Firstgas nominates the Clarus Duty Manager, or such other persons nominated and authorised by Firstgas from time to time to issue directions on behalf of Firstgas. Other such persons may include the Systems Operations Manager, Incident Controller, Emergency Management Team Leader and/or Critical Contingency Liaison (in the Emergency Management Team), Firstgas Control Room Operator, Duty Scheduler, Senior Management and communications personnel.

Appendix 6 of the Firstgas CCMP contains contact details of the suitably qualified Firstgas employees responsible for giving communications and directions under the CCMP and communications plans. These being:

bbkcontrolroom@firstgas.co.nz
emtl.emt@firstgasgroup.co.nz

The primary email used by the CCO for communicating with Firstgas during the exercise was intelligence.emt@firstgasgroup.co.nz. These are received by the CCO as Intelligence.EMT@clarus.co.nz (Note: if an email is sent to either domain name, they will be received due to internal Clarus email routing rules)

Recommendation:

- CCO should address all communications to the Intelligence, EMTL and BBK Control Room emails.
- CCO should update the Communications Protocol to reflect the new @clarus.co.nz email addresses.

7.5. 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 5.6 and Appendix 11 of the CCMP details the steps taken for considering alternate restoration arrangements.

This was not specifically tested through this test exercise, as the nature of the scenario was such that demand restoration was not carried out.

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

Appendix 8 of the CCMP contains detailed 12-step and 22-step processes for contingency imbalance calculation methodologies consistent with MPOC and GTC respectively. This section also describes how Firstgas will properly integrate the contingency imbalance regime prescribed in the CCM Regulations with Firstgas' business-as-usual regime under Section 8 of the Gas Transmission Code (GTC).

Although the CCO determined that the facts of Exercise Hanguro constituted a "non-regional" critical contingency, no critical contingency imbalances have been calculated as the exercise did not extend through to a termination notice.

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

Sections 3 and 4 of the CCMP address communications with, and the provision of information to the CCO. The CCMP also refers to the CCO Communications Plan, which in turn references the Communications Protocol.

The Communications Protocol is not formally recognised or referred to under the regulations. However, it was developed by Firstgas and the CCO to support the Communications Plan by specifying processes to ensure efficient information and communications flows between the CCO and Firstgas in accordance with the requirements set out in regulations 38 and 38A. A summary of the Communications Protocol is provided in Appendix 11 of the CCO's Communications Plan.

Observations:

- *The Communications Protocol requires the TSO to provide the CCO with a verbal update within 15 minutes and email update within 30 minutes of any material change to the event. The TSO took 22 minutes to provide a verbal update and 32 minutes to provide an email update to the CCO of inject #2.*
- *Overall, communications were carried out in a manner consistent with the CCMP, CCO Communications Plan and the Communications Protocol.*

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

Section 2 of the CCMP addresses pre-critical contingency situations and sets out the conditions under which Firstgas will notify the CCO of an event it believes could or would result in a critical contingency

scenario. It also states that Firstgas will communicate with the CCO in accordance with the CCO Communications Plan.

Firstgas met the regulatory requirement to alert the CCO within 15 minutes of an event within the transmission system that has the potential to create a critical contingency.

8. CCO Exercise Test Criteria and Observations

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

The first exercise inject was issued at 08:59. Firstgas subsequently alerted the Duty CCO by sms at 09:05 and requested they contact the Control Room. The Duty CCO responded to the sms at 09:05 and was advised of unplanned production outages at Oaonui and Kupe Production Stations following an earthquake.

The CCO was advised that the KGTP threshold of 3 hours to 35barg had been reached. The Control Room Operator confirmed that this was not considered a transient pressure condition.

The CCO determined that a critical contingency had occurred and advised the TSO that a Critical Contingency was being declared and written notice will be issued as soon as possible. The time of the declaration was confirmed as 09:10am.

CCO requested that a Security of Supply alert be sent and confirmation of who the TSO Duty Manager is.

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

8.2. CCO process for determining and declaring regional status [r52A]

The CCO determined that the unplanned production outages constituted a non-regional critical contingency as it was all the transmission system. The non-regional critical contingency status was notified as a part of the declaration notice.

A recommendation from Exercise Atiru (2022) “Update and revise the Gas Industry Company Guidelines for determining regional critical contingencies to provide guidance where the critical contingency status may change” is still to be closed out.

Recommendation:

- *GIC to continue the revision of the Guidelines for determining regional critical contingencies.*

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

The Communications Protocol incorporates a process with associated timeframes for Firstgas to provide information to the CCO that is considered necessary to ensure that the CCO has the information required to prepare and issue notices to Firstgas and stakeholders.

The notices issued for the exercise were sent to the correct parties and stakeholders and contained the correct information and were issued within regulatory timeframes.

Observation:

- *Feedback from one participant stated that the curtailment for band 4 on the revised demand curtailment notice was not clear for them. They noted that it was not easy to work out what had changed between the notices.*

Recommendation:

- *Highlight what has changed on revised curtailment notices to make the changes easier to identify*

Observation:

- *The CCO believes the current notice process as done by the CCO and TSO is long-winded and believes it could be streamlined. A proposal has been given to Firstgas to consider.*

Recommendation:

- *The CCO and Firstgas work together to explore ways of streamlining the notice process*

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

The CCO determined that demand curtailment would be required to balance the transmission system.

At 09:50, the CCO consulted the Electricity System Operator (ESO) to determine any need for Huntly Power Station to use gas for its electricity supply designation. The ESO advised that curtailment of gas-fired generation would have an impact on electricity supply and the Rankine units at Huntly Power Station would be required.

At 10:02, the CCO sent an email request to all Producers at to explore opportunities for additional gas supply:

- A Storage Facility responded that one of their customers wished to discuss supplying additional gas.
- One Producer responded that they had additional capacity that could be released.
- One Producer confirmed that they were already supplying at maximum capacity.
- One Producer queried what price they would get if they were to supply additional gas. The producer was advised that the price is determined after the event. The producer advised it had no additional gas it could supply.

At 10:20, the CCO consulted with Huntly Power Station and was advised that two Rankine units were already running on coal. The CCO concluded from this that gas would not be required for an electricity supply designation.

For the purposes of the exercise, the CCO determined that curtailment of Bands 0, 1, 2 and 3 across the entire system that permitted approved critical processing designations would be required to stabilise the system. Note: In an actual event, curtailment of Bands 0, 1 and 2 would likely have been sufficient to balance the system. The CCO decided to extend the curtailment to band 3 to allow more participants to exercise their processes, increasing the value of the exercise.

A demand curtailment notice was drafted by the CCO, shared with Firstgas, and then formally sent to Firstgas at 10:45. The notice was copied to stakeholders, posted on the CCO website and an SMS sent.

At 11:15, the CCO received a request from Huntly Power Station via Gas Industry Company for approval to use 4TJ of gas to start a third Rankine unit at Huntly Power Station.

At 11:21, the TSO advised that the production outage would extend for 48 hours. The CCO consulted with the TSO and determined that (for the purpose of the exercise), further load curtailment would be required to stabilise the system.

A revised demand curtailment notice which included Band 4 and permitted the Huntly Electricity Supply Designation was drafted by the CCO, shared with Firstgas, and then formally sent to Firstgas at 12:10. The notice was copied to stakeholders, posted on the CCO website and an SMS sent.

Observation:

- *The TSO observed that the revised demand curtailment notice recorded that compliance updates were to be provided every “2 hours”. It was assumed this meant 2-hours from the last scheduled update of 11:30 but it could have been interpreted differently*

Recommendation:

- *The CCO to consider always including a specific time for compliance updates, supplemented with an instruction such as “then every 2-hours from this time” in revised demand curtailment notices*

Observation:

- *A retailer noted that on the revised curtailment notice extending the curtailment to band 4, it was not easy to see what had changed.*

Recommendation:

- *Highlight what has changed on revised curtailment notices to make them easier to identify*

The process for demand restoration was not tested as a part of this scenario.

8.5. CCO process for determining and notifying termination [r60]

The exercise was concluded before the need for a termination notice arose due to the scenario requiring a two-day repair time.

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

Load curtailment decisions are supported by a load modelling tool. Firstgas provides the CCO with data files of the current transmission system conditions from their SCADA system. These files are provided at 5-minute intervals via an automated process. By the time the CCO receives the files and loads them into the modelling tool, the data is approximately 10 minutes old.

Actual SCADA data was not used during the exercise as all system conditions were simulated for the purpose of the exercise.

Firstgas is undertaking a SCADA upgrade project which should result in the CCO being able to view real-time SCADA data to better facilitate real-time decision making.

8.7. CCO publishes information [r54A, Schedule 5]

The CCO had obligations to provide public statements in accordance with Schedule 5 of the regulations by 1pm. At 11:06, the CCO requested that the affected asset owners provide information that would inform the CCO's Status Update Notice.

Both affected asset owners provided a brief asset owner statement (see Appendix D).

The GIC provides support to the CCO on the provision of media and public information and following consultation, a CCO Status Update Notice was published at 1pm.

8.8. CCO performs to required standard [SPACCO Schedule 2]

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

The Exercise Event Log in Appendix B demonstrates that the CCO performed the required tasks in accordance with the performance standards.

9. Retailers and Large Consumers Exercise Test Criteria & Observations

9.1. Participation

All retailers and large consumers were requested to participate in the exercise and issued with a Participants Briefing on 28 March.

Prior to the exercise, the annual training for all stakeholders, designed as an introductory overview, was delivered via Teams on 10 April. The session was well attended and received positive feedback.

'Bespoke' training sessions designed to focus on the retailer obligations under the regulations were offered to the largest retailers. This offer was taken up by Genesis Energy.

9.2. Retailer curtailment plans to contain sufficient information to ensure a person responsible for gas usage at each consumer installation can be contacted at any time. [r43]

The Retailer Curtailment Plans are submitted by retailers to Gas Industry Company but are not held by the CCO. Some retailers choose to share their plan with the CCO.

All the retailers that provided feedback confirmed that they have processes for capturing emergency contacts and keeping them up to date and provided some detail about their processes.

9.3. Retailer to test that the list of emergency contact details maintained in accordance with regulation 43 is current. [r34]

The Participant's Brief gave advice to retailers about testing their emergency contacts. All retailers have different circumstances, but the following suggestion was made:

Contact a sample of consumers across the different bands to verify that contact details are current. The sample of consumers contacted should be commensurate to the retailer's total number of consumers, but the CCO recommends at least:

- *All Band 3 consumers*
- *20% of Band 4 consumers*
- *All Band 5 consumers*
- *10% Band 6 consumers*
- *All Band 7 consumers*

Keep statistics relating to the number of consumers contacted in each band and the number of updates made to your contact database.

This advice was highlighted during the Retailer training sessions.

Retailers were also advised that testing of consumer contact details could be carried out prior to the exercise day. Retailers were required to provide supporting evidence of such testing to the CCO within 7 business days of completion of the exercise. The CCO provided a Test Report Template for retailers to use (Appendix F).

A summary of the feedback received from retailers on testing of emergency contact details is shown below:

Contact Energy

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	0	661	NA	NA	NA
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	NA	73	NA	NA	NA
For the consumers contacted to verify contact details, what percentage were incorrect?	NA	4.4%	NA	NA	NA
If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	At a maximum, 5 mins per call. In a real emergency, in addition to calling customers we would organise bulk SMS updates to be sent to impacted customers and website messaging. It is not practical to complete this step during the test exercise.				

Genesis Energy

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	81	1419	NA	NA	NA
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	81	1419	NA	NA	NA
For the consumers contacted to verify contact details, what percentage were incorrect?	9%	9%	NA	NA	NA
7. If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	20 Mins	3 Hours	NA	NA	NA

Mercury (inc Trustpower)

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	3	131	NA	NA	NA
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	All	All	NA	NA	NA
For the consumers contacted to verify contact details, what percentage were incorrect?	1%	1%	NA	NA	NA
If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	5 minutes	3.5 hours	NA	NA	NA

Nova and Megatel

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	Nova 172 MegaTEL 1	Nova 3,147 MegaTEL 104	NA	NA	NA
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	We contacted all our natural gas customers with our regular CCO contact detail update/ check emails/letters in December 2023.				
For the consumers contacted to verify contact details, what percentage were incorrect?	In our December 2023 CCO communications, around 4.5% of our business natural gas customers contact details required updates.				
If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	We estimate we would need around 15 minutes to get the data ready and 10 minutes to send out the notifications (SMS/Email). Note: This estimate may vary depending on the time of day and the actual day (i.e., weekday versus weekend/public holiday).				

OnGas

Curtailment Bands:	3	4	5	6	7
How many consumers did you have in each of the affected bands?	13	8	NA	NA	NA
During the exercise, how many consumers in each curtailment band did you contact?	13	8	NA	NA	NA
Of those consumers contacted, how many were the correct contact details?	15%	15%	NA	NA	NA
Of those consumers contacted, how many were aware of their obligations under a critical contingency?	< 30 minutes	< 30 minutes	NA	NA	NA

Greymouth

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	37	16	NA	NA	NA
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	100%	100%	NA	NA	NA
For the consumers contacted to verify contact details, what percentage were incorrect?	Prevailing details correct from our perspective, with minimal updates required from pre-exercise review.				
7. If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	It depends on the circumstances, e.g. whether in or out of office, and the time the message was received by the company agent (not by the tool of that agent) regardless of when the TSO were to send a text. A similar context applies to contacting consumers.				

No feedback was received from Pulse Energy or Hanergy.

Observation:

- *There was a good level of testing from some retailers. Others relied on their BAU processes for reassurance about the validity of their contacts.*
- *It was noticeable that retailers had a broad range of capability with regard to their mechanisms for contacting consumers and their expectations about how long this may take.*
- *Some retailers make good use of SMS in combination with phone calls.*

9.4. Retailers and large consumers to apply approved supply designations [r46]

On the first curtailment notice Methanex, Ballance and all band 3 were allowed gas under their designations for their approved shutdown profiles. As noted in section in 8.4, after discussion with the ESO and Huntly power station, which established they were already running two Rankine units on coal, no gas was allocated to Genesis under their designation.

Contact was made with Methanex, as the largest user of designated gas, to confirm they had seen and understood the curtailment notice and to obtain information about what gas volumes would be used in their shutdown, based on that day's operational information.

Huntly subsequently contacted the CCO to request a designation of gas to start a third Rankine unit. The CCO agreed verbally to this request and the granting of this designation was noted as a change in the revised curtailment notice. The revised curtailment notice also allowed gas for band 4 critical processing designations.

Observation:

- *Genesis' request for gas exceeded the amounts allowed under their current designation. Their current designation allows 1.2TJs over 12 hours from a cold start for each Rankine unit. Their request was for 4 TJs over 6 hours.*

Recommendation:

- *Genesis reconsiders its current electricity supply designation for Huntly Power Station in conjunction with Gas Industry Company.*

9.5. Retailers and large consumers to provide regular updates to TSO [r55/56]

Retailers provided curtailment compliance updates to Firstgas using the Firstgas Combined Large Consumer and Retailer Update Template. The individual large consumer updates were forwarded to the CCO. The retailer updates were consolidated into a single update and provided to the CCO.

Observation:

- *Firstgas reported that the quality, quantity and timeliness of curtailment compliance updates by retailers and large consumers did vary throughout the exercise*

Recommendation:

- *That Firstgas continue to work with retailers and large consumers to ensure that they understand curtailment compliance processes and expectations*

Observation:

- *Large consumers and retailers are required to send compliance updates to Firstgas. Firstgas collates this information and supplies it to the CCO. During the exercise some suppliers of data sent their compliance updates to the CCO instead of Firstgas. Others cc'd in the CCO when sending their information to Firstgas. Firstgas also sent the CCO copies of large consumer updates they had received along with a consolidated summary of the*

retailer updates. All of this created a lot of traffic in the CCO inbox making it difficult to identify the key pieces of information.

Recommendation:

- *Explore if there are process improvements/training opportunities to streamline the email traffic received by the CCO associated with compliance updates.*

9.6. Retailers to Implement Media Appeals [r53]

The following retailers are signatories to the Domestic Gas Retailers Communications Protocol: Trustpower, Contact Energy, Genesis Energy, Mercury, and Pulse Energy. The protocol provides for the establishment of a position of a “Lead Retailer” to act for and on behalf of all the signatories during a critical contingency event in respect to the organisation of national media appeals for conservation of gas by domestic consumers. The role of Lead Retailer for 2024 is held by Contact Energy.

There was no requirement for a media appeal as part of the exercise. However, Contact Energy advised they had engaged and prepped the messaging with their comms stakeholders in the event it would have been required. It is however noted that it has been some time since the media representatives of the relevant organisations have met to discuss how they would work together during an event.

Recommendation:

- *The GIC organise a meeting of media representatives from retailers, Firstgas and other asset owners to review how they work together to supply efficient and cohesive public information in the event of a critical contingency.*

10. Asset Owners Exercise Test Criteria and Observations

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

Beach Energy and OMV were the affected asset owners in the exercise due to the unplanned outages at Kupe and Maui. The CCO contacted both producers during the exercise to discuss the scenario and to remind them of the requirement for asset owner statements.

Beach and OMV both provided asset owner statements (see Appendix D), but in view of this being an exercise, did not make them public.

Observation:

- *There was confusion between the CCM regulation requirements for asset owner statements and the requirements of the Gas (Facilities Outage Information Disclosure) Rules 2022. The two regulatory requirements are separate, with different triggers and different information requirements. A producer would need two separate processes for complying with each requirement, even though it is possible for both requirements to be*

triggered by the same event. Publishing on the outage disclosure notice system would not meet the needs of an asset owner statement under the CCM regulations.

Recommendation:

- *Provide feedback to OMV and Beach regarding the separate requirements of the CCM Regulations relating to asset owner statements over and above those of the Gas (Facilities Outage Information Disclosure) Rules 2022.*

Appendix A – Exercise Injects

Inject #1A for TSO. 08:59am

Exercise Hanguru

For the purposes of the exercise, the Control Room is to assume that:

- Control Room personnel felt an earthquake a few minutes ago.
- No-flow alarms are showing on SCADA for Oaonui and Kupe Production Stations.
- Transmission System Conditions are:
 - Mokau Compressor Station is not available.
 - There is high demand for Electricity Generation due to cold weather.
 - Maui Linepack is 260TJ.
 - Maui Linepack is now falling at 6TJ/hr.
 - KGTP Threshold 3 Hours to 35 Bar
 - Rotowaro Threshold 6 Hours to 30 Bar
- Weather conditions:
 - Very high winds
 - Cold temperatures due to southerly airflow.
- Control Room Operator has called Oaonui and Kupe, who have advised that the Maui Platform supply and therefore Oaonui Production Station, and Kupe Production Station have tripped following an earthquake. Time to restore supply is not yet known.

Further advice on Gas Production and Transmission system conditions will be provided by 10:00am.

The TSO is to assume that the CCO is not aware of the above status and will only act on information provided by the TSO.

Any queries relating to this inject should be referred to the CCO Exercise Controller.

Exercise Hanguru

Inject #1B for OMV and Beach Energy. 09:04am

Exercise Hanguru

For the purposes of the exercise, OMV and Beach are to assume that:

- Personnel felt an earthquake approx. 09:00am.
- Oaonui and Kupe Production Stations have tripped.
- Weather conditions:

- Very high winds
- Cold temperatures due to southerly airflow.
- Oaonui and Kupe have advised FirstGas Control Room that the Maui offshore platform and the Kupe Production Station have tripped following an earthquake. Time to restore supply is not yet known.

OMV and Beach should begin to consider the scenario and await a phone call (or contact) from the CCO.

Any queries relating to this inject should be referred to the CCO Exercise Controller.

Exercise Hanguru

Inject #2 for TSO 09:53am

Exercise Hanguru

For the purposes of the exercise, the Control Room is to assume that:

- OMV have advised they are unable to restart operations at Oaonui until engineers are mobilised to Maui A and Maui B to complete assessment of the structures. This will take at least 12 hours.
- Beach have advised they are mobilising an inspection team to the Kupe platform, and this will take at least 8 hours. They are also mobilising engineers to the production station to assess any damage on the site.
- After shocks are continuing with the largest being 5.2 approximately 25 minutes after the main quake.
- Transmission System Conditions are:
 - Maui Linepack is 254TJ.
 - Maui Linepack is now falling at 6TJ/hr.
 - KGTP Threshold 2.5 Hours to 35 Bar
 - Rotowaro Threshold 5 Hours to 30 Bar

Further advice on Gas Production and Transmission system conditions will be provided by 11:00am.

The TSO is to assume that the CCO is not aware of the above status and will only act on information provided by the TSO.

Any queries relating to this inject should be referred to the CCO Exercise Controller.

Exercise Hanguru

Inject #3 for TSO. 10:59am

Exercise Hanguru

For the purposes of the exercise, the TSO is to assume that:

- OATIS has had an unplanned outage, cause unknown. No aspects of the system are functioning.
- OATIS should be presumed to be unavailable for the remainder of the exercise.
- The TSO should initiate its DR plan and communicate to stakeholders what to expect.
- The stakeholder communication should ensure it is clear that the OATIS failure only relates to the exercise and remains available for BAU non-exercise activities.

The TSO is to assume that the CCO is not aware of the above status and will only act on information provided by the TSO.

Any queries relating to this inject should be referred to the CCO Exercise Controller.

Exercise Hanguru

Inject #4 for TSO. 11:30am

Exercise Hanguru

For the purposes of the exercise, the Control Room is to assume that:

- The mobilisation of inspection Teams to Maui and Kupe platform is being delayed due to high winds restricting helicopter travel.
- Estimated inspection completion time is now 24 hours.
- Transmission System Conditions are:
 - Maui Linepack is 249TJ.
 - Maui Linepack is now falling at 4TJ/hr.
 - KGTP Threshold 2 Hours to 35 Bar
 - Rotowaro Threshold 4 Hours to 30 Bar

Further advice on Gas Production and Transmission system conditions will be provided by 1pm.

The TSO is to assume that the CCO is not aware of the above status and will only act on information provided by the TSO.

Any queries relating to this inject should be referred to the CCO Exercise Controller.

Exercise Hanguru

Inject #5 for TSO 1.27pm

Exercise Hanguru

For the purposes of the exercise, the Control Room is to assume that:

- Maui engineering assessment topside has been completed initially although divers have not been mobilised due to a recent series of aftershocks. Further options being discussed.
- Kupe engineering assessment team have been mobilised onto the platform and established communication with the Production Station control room. Initial visual inspection is suggesting the platform appears to be structurally intact.
- Kupe production station engineering assessment has been largely completed and no damage requiring further work (i.e. Fitness for Service inspections/testing) should be required prior to restarting the facility.

Further advice on Gas Production and Transmission system conditions will be provided by 3pm.

The TSO is to assume that the CCO is not aware of the above status and will only act on information provided by the TSO.

Any queries relating to this inject should be referred to the CCO Exercise Controller.

Exercise Hanguru

Inject #6 for all Participants. 2:56pm

Exercise Hanguru

There will be no further injects for the exercise. Retailers and large consumers should continue to submit the next update by 3.30pm.

For this scenario which would span more than 24 hours, demand restoration requirements would be subject to on-going review by the CCO, and regular status updates would be provided.

Instructions to restore demand would be issued as and when supply to the gas transmission system was stabilised.

Demand Restoration Notices and Critical Contingency Termination Notice will not be issued for this exercise.

Any queries or feedback regarding this inject can be sent to cco@cco.org.nz or, for more urgent queries please call Exercise Control.

Exercise Hanguru

Appendix B – Exercise Event Log

This log is a summary of events. Not every communication has been noted in this report.

Event:	Exercise Hanguru	Date:	15/05/2024
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Time	From	To	Details
08:30			CCO Website Current Events page updated to advise Exercise Hanguru has commenced.
08:50	Exercise Control	CCO Email Contacts	Email to advise Exercise Hanguru has commenced
08:51	Exercise Control	CCO SMS Contacts	SMS to advise Exercise Hanguru has commenced.
08:56	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 76195 "Exercise Hanguru – Exercise Hanguru has commenced" - Action Required.
08:58	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 76194 "Exercise Hanguru – Exercise Hanguru has commenced" - Action Required.
08:59	Exercise Control	BBK Control Room	Inject #1A issued by email and followed up with phone call.
09:04	Exercise Control	OMV & Beach Energy	Inject #1B issued by email.
09:05	BBK Control Room	CCO	Gas Controller sends SMS to CCO requesting Duty CCO to contact Control Room.
09:05	CCO	BBK Control Room	CCO contacts Control Room. CCO advised of unplanned production outages at Oaonui and Kupe following earthquake. CCO advised that KGTP threshold has been reached. CCO determines a critical contingency has occurred. CCO advises the TSO that a Critical Contingency is being declared and written notice will be issued as soon as possible. CCO requests Security of Supply alert to be sent and confirmation of who the TSO Duty Manager is.
09:13	CCO	OMV Duty Nominations	CCO calls the landline number provided but doesn't reach the correct contact so calls the mobile number provided. Duty person responded. Inject 1B and scenario discussed. OMV requested changes to contacts.
09:19	BBK Control Room	CCO	Security of Supply Alert #1 issued. 19 minutes after inject #1A provided.
09:21	CCO	Kupe Control Room	Called Control Room. Does not have access to email so unaware of Inject 1B. CCO then called a listed contact who confirmed receipt of Inject 1B. Scenario discussed.
09:25	Exercise Control	TSO Duty Manager	Draft Critical Contingency Notice CC-083 based on discussions and Security of Supply alert #1 sent for review.
09:30	CCO	GIC	CCO advising GIC that a CC is being declared and the background information leading up to the declaration.
09:33	TSO Intelligence - EMT	CCO	Discussion on Draft Notice CC-083
09:38	TSO Intelligence - EMT	CCO	Email confirming CC-083 is OK to be issued.

Time	From	To	Details
09:45	CCO	TSO & Stakeholders	Critical Contingency Declaration notice CC-083 emailed to TSO & Stakeholders.
09:46	CCO		Website updated with Declaration Notice CC-083.
09:47	CCO	CCO SMS Contacts	SMS text advising CC-083 has been published.
09:50	CCO	ESO	Phone to ensure CCO Notice has been seen and determine requirement for Huntly Power Station.
09:53	Exercise Control	BBK Control Room	Inject #2 emailed and followed with phone call.
09:53	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 76203 "Exercise Hanguru –Critical Contingency Declaration Notice CC-083" - Action Required. 8 minutes after CCO Notice issued.
09:55	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 76204 "Exercise Hanguru –Critical Contingency Declaration Notice CC-078" - Action Required. 10 minutes after CCO Notice issued.
10:02	CCO	Producers	Email request to explore options for additional gas.
10:10	TSO Intelligence - EMT	CCO	Security of Supply Update #2 issued. 17 minutes after inject #2 provided. Report stated No Material Changes despite inject #2.
10:15	TSO Intelligence - EMT	CCO	Phone call with additional information. 22 minutes after inject #2. Discussion regarding proposed curtailment.
10:20	CCO	Huntly Power Station	Discussion re status of gas generation. Band 2 curtailment to be implemented. Running on coal on two Rankines. 3 rd Rankine available.
10:25	TSO Intelligence - EMT	CCO	Security of Supply Update #3 issued. 32 minutes after inject #2 provided.
10:29	CCO	TSO Intelligence - EMT	Draft Demand Curtailment notice sent for review. (CC-084)
10:32	TSO Intelligence - EMT	CCO	TSO confirms draft notice (CC-084).
10:45	CCO	TSO & Stakeholders	Demand Curtailment notice CCO-084 emailed to TSO and Stakeholders.
10:46	CCO		Website updated with Demand Curtailment Notice CC-084.
10:48	CCO	CCO SMS Contacts	SMS text advising CC-084 has been published.
10:49	CCO	GIC	Advising GIC of curtailment details.
10:53	CCO	Methanex Nominations	Confirmation of notices and situation. Curtailment processes and durations of shutdown of the Motunui plant.
10:55	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 76207 "Exercise Hanguru" – Direction to Curtail Demand Notice CC-084" - Action Required. 10 minutes after CCO Notice issued.
10:57	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 76208 "Exercise Hanguru" – Direction to Curtail Demand Notice CC-084" - Action Required. 12 minutes after CCO Notice issued.

Time	From	To	Details
10:59	Exercise Control	BBK Control Room	Inject #3 emailed to Control Room and followed up with phone call.
11:06	CCO	OMV	Asset owner statement requested.
11:08	CCO	Kupe	Asset owner statement requested.
11:08	TSO Intelligence - EMT	CCO	Phone to advise of a full OATIS outage. 9 minutes after inject #3.
11:08	Balance AUP	CCO	Missed call as on other with TSO.
11:10	CCO	Balance AUP	Clarifications of curtailment requirements.
11:15	CCM Designations	CCO	Request from Genesis via GIC for 4TJ gas to start 3 rd Rankine unit at Huntly Power Station.
11:21	TSO Intelligence - EMT	CCO	Security of Supply Update #4 issued. 22 minutes after inject #3 provided.
11:21	CCO	Methanex	Call to respond to AMS message advising of incorrect units used in curtailment compliance.
11:28	TSO Nominations	CCO	Advising that OATIS is not available. Email contacts and alternate sms will be used.
11.30	Exercise Control	BBK Control Room	Inject #4 emailed to Control Room and followed up with phone call
11:31	Genesis	CCO	Discussion re Huntly Rankine designation.
11:33	CCO	Genesis	Email to advise gas for 3 rd Rankine would be approved.
11:36	Beach Energy	CCO	Brief asset owner statement received. Focus on meeting GIC disclosure requirement.
11:38	Genesis	CCO	Query re volume and duration of gas permitted for 3 rd Rankine.
11:42	Exercise Control	Duty Scheduler	Phoned scheduler to clarify that they didn't need to forward all retailer updates to the CCO
11:43	CCO	TSO Intelligence - EMT	Draft Revised Demand Curtailment notice sent for review. (CC-085)
11:44	TSO Intelligence - EMT	CCO	Security of Supply Update #5 issued.
11:49	TSO Intelligence - EMT	CCO	Draft notice CC-085 sent with proposed changes.
11:56	OMV	CCO	Advising that asset owner statement is in progress.
11:58	Critical Compliance	CCO	1 st consolidated update of Retailer curtailment compliance.
12:10	CCO	TSO & Stakeholders	Revised Demand Curtailment notice CCO-085 emailed to TSO and Stakeholders.
12:10	CCO		Website updated with Revised Demand Curtailment Notice CC-085.
12:10	CCO	CCO SMS Contacts	SMS text advising CC-084 has been published.
12:16	TSO	Interconnected Parties	Revised Direction to Curtail Demand Notice CC-085 emailed to TSO contacts due to OATIS outage, 6 minutes after CCO Notice issued.

Time	From	To	Details
12:34	GIC	CCO	Draft media release provided for review.
12:41	OMV	CCO	Brief asset owner statement received. Focus on meeting GIC disclosure requirement.
12:46	CCO	Genesis	Confirming current designation amounts.
12:48	CCO	TSO Intelligence - EMT	Draft Status Update Notice CC-086 sent for review.
12:54	TSO Intelligence - EMT	CCO	Draft notice CC-086 sent with proposed changes.
13:00	CCO	TSO & Stakeholders	Status Update Notice CC-086 emailed to TSO and Stakeholders.
13:00	CCO		Website updated with Status Update Notice CC-086.
13:01	CCO	CCO SMS Contacts	SMS text advising CC-086 has been published.
13:09	TSO	Interconnected parties	Status Update Notice CC-086 emailed to TSO contacts due to OATIS outage 9 minutes after CCO Notice issued.
13:23	TSO Intelligence - EMT	CCO	Security of Supply Update #6 issued.
13:27	Exercise Control	BBK Control Room	Inject #5 emailed to Control Room.
13:45	TSO Intelligence - EMT	CCO	Security of Supply Update #7 issued. 18 minutes after Inject #5.
14:10	Critical Compliance	CCO	2 nd consolidated update of Retailer curtailment compliance.
14:36	Critical Compliance	CCO	3 rd consolidated update of Retailer curtailment compliance.
14:48	TSO Intelligence - EMT	CCO	Security of Supply Update #8 issued.
14:56	Exercise Control	CCO Email Contacts	Inject #6 issued. Confirming the final inject.
15:34	Exercise Control	CCO Email Contacts	Email to advise Exercise Hanguru has ended.
15:36	CCO	Stakeholders	SMS to advise Exercise Hanguru has ended.
15:38	CCO	Retailers	Retailer Feedback Template issued.
15:58	Critical Compliance	CCO	Final consolidated update of Retailer curtailment compliance.

Appendix C – Notice Summary

All CCO notices can be viewed in full on the CCO Website at: <https://www.cco.org.nz/historical-events/>

Firstgas TSO notices can be viewed on the OATIS website at: <https://www.oatis.co.nz> using 'Notice Search' button and begin date of 15/05/24

CCO Notices to TSO

CCO Notice ID	Notice Type	Time CCO e-mailed Notice to TSO	Time TSO Published CCO Notice	
			OATIS (Maui)	OATIS (Firstgas)
CC-083	Critical Contingency Declaration	09:45	09:53	09:55
CC-084	Direction to Curtail Demand	10:45	10:55	10:57

CCO Notice ID	Notice Type	Time CCO e-mailed Notice to TSO	Time TSO e-mailed Notice to Stakeholders
CC-085	Revised Direction to Curtail Demand	12:10	12:16
CC-086	Status Update	13:00	13:09

The exercise was closed without moving through the restoration and termination phases.

Appendix D - Public Statements issued.

As supplied by Beach Energy

To all concerned

Kupe Production Station has tripped following an earthquake at approx. 09:00am Wednesday 15th May, we are currently accessing the plant and associated equipment prior to restarting, time to restore supply is currently not yet known and are considering if further GIC disclosure notification will be required.

As supplied by OMV

Our communication team has issued an Asset Owner Statement

“Following the earthquake earlier this morning, OMV New Zealand have shut down the Māui field as a precautionary measure. Customers have been advised and the team are working on restoring production.”



15 May 2024
 Immediate release

EXERCISE HANGURU

Gas Critical Contingency Event

1pm update

The Gas Industry Critical Contingency Operator has declared a Critical Contingency following an earthquake that tripped the Maui Platform and Kupe Production Station.

The Kapuni Gas Treatment Plant pressure threshold has been breached. As a result, demand by certain users is being curtailed to stabilise the transmission system.

The Critical Contingency Operator has issued a notice to gas users up to band 4 to curtail their demand to ensure the long-term security of supply. This means that industrial and commercial gas users with consumption of over 250GJ a year must curtail all demand immediately unless they have a pre-approved designation. Consumers with an approved designation must curtail demand in accordance with the approved shutdown profile.

The curtailment notice affects consumers in all areas such as dairy factories, pulp & paper processing, manufacturers, large fast-food outlets, large retail and leisure facilities and glass houses as well as all large consumers (Bands 0, 1 and 2.)

The full list of curtailment directions is below.

Demand Curtailment Directions

Band	Approved Designation	Gate #	Gas Gate Name	Curtailment Direction
0		STR00511	AHURUA STORAGE FACILITY (Stratford #3)	Curtail all demand immediately
1	Electricity Supply	HPS02993	HUNTLY POWER STATION (Rankine Units 1-4)	Approval to use a maximum of 4 TJ over a <u>1 hour</u> period to switch 1 Rankine unit to alternate fuel.
2		HPS02993	HUNTLY POWER STATION (Units 5 & 6)	Curtail all demand immediately
2	Critical Processing	NGA00669	NGATIMARU RD (DELIVERY) (Mx Motunui)	Curtail all demand in accordance with approved shutdown profile
2	Critical Processing	FAU00653	FAULL RD (Mx Motunui)	Curtail all demand in accordance with approved shutdown profile
2	Critical Processing	BER00564	BERTRAND RD (Mx Waitara Valley)	Curtail all demand in accordance with approved shutdown profile
2	Critical Processing	BAL08201	BALLANCE AMMONIA-UREA (Fuel)	Curtail all demand in accordance with approved shutdown profile
2	Critical Processing	BAL0626	BALLANCE AMMONIA-UREA (Process)	Curtail all demand in accordance with approved shutdown profile
2		TCC00201	TARANAKI COMBINED CYCLE (TCC)	Curtail all demand immediately
2		STR00521	STRATFORD POWER STATION PEAKERS (Stratford #2)	Curtail all demand immediately

Band	Approved Designation	Gate #	Gas Gate Name	Curtailment Direction
2		TRC02003	TE RAPA COGENERATION PLANT	Curtail all demand immediately
2		MAN39001	MANGOREI DELIVERY POINT	Curtail all demand immediately

Band	Approved Designation	Description	Curtailment Direction
3	None	Industrial and commercial consumers >10 TJ/annum	Curtail all demand immediately
	Critical Processing	Industrial and commercial consumers >10 TJ/annum with an approved designation.	Curtail all demand immediately
4	None	Medium-sized industrial and commercial consumers >250 GJ/annum	Curtail all demand immediately
	Critical Processing	Medium-sized industrial and commercial consumers >250 GJ/annum with an approved designation.	Curtail all demand in accordance with approved shutdown profile.
5	Essential Services	Consumers >2 TJ/annum with an approved designation	Not affected
6	Not Applicable	Small commercial customers < 250 GJ/annum	Not affected
7	Critical Care	Consumers of any size consumption with approved designation	Not affected

Mobilisation of inspection teams to Maui and Kupe platforms is being delayed due to high winds restricting helicopter travel. Inspection of the platforms is now estimated in 24 hours.

No timetable for reinstatement can be estimated until inspections are complete.

For further information, relating to the asset, please contact the respective Maui and Kupe asset owners.

ENDS

Contact: John Pagani, Gas Industry Co, 021 570 872, john.pagani@gasindustry.co.nz

Issued by Gas Industry Co on behalf of the Critical Contingency Operator. Gas Industry Co is the industry-owned co-regulator of the gas industry. The incident is managed by the gas asset owner.

Information about critical contingency management and curtailment

The critical contingency operator makes a declaration of a critical contingency if pressure on the transmission pipelines falls below a threshold. The operator will call for certain consumers to stop using gas to stabilise pressure in the transmission pipelines. Many critical contingencies can be managed by curtailing only the load from large plants. The CCO issues curtailment directions to transmission system owners, who relay them to large consumers and to retailers, who in turn notify their customers. Customers who are required to curtail demand will receive an urgent notice from their retailer or transmission system owner.

More information is available here:

<https://www.gasindustry.co.nz/assets/WorkProgrammeDocuments/4881Consumer-Information-Flyer-Regarding-Critical-Contingencies.pdf>