



# CCO ANNUAL EXERCISE 2018

## Exercise Paparua

Test of the First Gas Ltd Critical Contingency Management Plan

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

June 2018

Critical Contingency Operator  
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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.

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## 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 Plan (CCMP) complies with regulation 25 and achieves the purpose of the regulations
- 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 required by regulation 43 is current

A test exercise, “Exercise Papparua” was carried out on 9 May 2018. The exercise required the CCO, TSO and Retailers to carry out tasks and activities associated with the regulations, CCMP and other relevant documents.

After the exercise, regulation 34 also requires that:

- within 10 business days of the exercise the 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 business days of receiving the TSO report, the CCO provides a report to the industry body that assesses the effectiveness of the CCMP; evaluates any amendments recommended by the TSO; and identifies any amendments to the regulations, CCMP, communications plan or information guide that would improve the effectiveness in achieving the purpose of the regulations.

This report on Exercise Papparua for the industry body is based on:

- the CCO’s pre-test exercise audit of the TSO
- the TSO post exercise report
- Retailer self-assessment forms and feedback from other participants
- observations from observers placed in the TSO control room 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 Papparua 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, public information statements, Retailer media appeals and consumer compliance updates.

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This report concludes that:

- the CCMP substantially complies with regulation 25 and is effective in achieving the purpose of the regulations; and
- The CCMP substantially contains the contact details required by regulation 25 and that they are current; and
- The exercise provided limited evidence that the list of emergency contact details maintained by Retailers required by regulation 43 is current. The evidence was primarily through description of the Retailers business as usual processes. Only one retailer contacted a sample of consumers as part of the exercise to confirm completeness and accuracy of contact details.

This report makes recommendations in Section 5 to improve the efficiency of processes and procedures to support application of the CCMP and improve the level of confidence that the list of emergency contact details maintained by Retailers required by regulation 43 is current.

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

### **3. Exercise Scenario**

The exercise scenario was designed and managed by the TSO in conjunction with the CCO. This was to allow the TSO the opportunity to test its contingency planning for response to a particular transmission system risk. The scenario centered on a large landslip impacting on the First Gas Maui pipeline in north Taranaki at a location described as Gilbert Stream. Approximately 15 metres of pipeline was exposed and left unsupported. This resulted in the isolation and depressurization of that section of pipeline which affected gas supplies to all areas north of that location. Affected areas included Northland, Auckland, Waikato and Bay of Plenty. Supplies in Taranaki and south to Wellington and the Hawkes Bay were not affected.

The exercise required the CCO, TSO and Retailers to carry out tasks and activities associated with the regulations, CCMP and other relevant documents. The TSO also elected to consider the actions that would be taken pursuant to the Maui Pipeline Operating Code (MPOC) in the parts of the transmission system that were not directly subject to the CCM Regulations and directions from the CCO.

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 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 injects are detailed in Appendix A.

A point of difference in this year's test exercise was the TSO activating a full Emergency Response Team to respond to the exercise scenario. This was a different approach to previous exercises which focused primarily on the requirements of CCM Regulations and supporting documents and processes. Both the

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TSO and the CCO considered this was a useful approach as it made the exercise more realistic, particularly for the TSO.

Other features arising from this year's scenario were:

- First Gas testing new communications protocols for preparing and issuing public statements.
- Trustpower in the role of Lead Retailer for the Gas Retailers Communications Protocol.

Observers positioned in the First Gas operations control room included representatives from the GIC. These observers were not directly involved in the exercise and were present to monitor events as they occurred. Exercise debriefings were held with CCO, TSO and GIC observers following the exercise.

## **4. Summary of Assessment against Test Criteria**

### **4.1. CCO Assessment**

The CCO considers that the test exercise provided sufficient evidence to conclude that the CCMP complies with regulation 25 and is effective in achieving the purpose of the regulations.

The CCO also considers that the test exercise provided sufficient evidence to conclude that the contact details contained in the CCMP as required by regulation 25 are substantially current.

The CCO has made recommendations to improve the efficiency of processes and procedures to support application of the CCMP which are included in Section 5.

The CCO also considers that while the test exercise provided some evidence to conclude that the list of emergency contact details maintained by Retailers required by regulation 43 is substantially current, the evidence is limited. Only one of the Retailers elected to contact a sample of consumers to test that the details were correct. The remaining Retailers elected not to contact any consumers and placed full reliance on their process for capturing and maintaining consumer contact details. The CCO recommends that all Retailers ensure they test a sample of their critical contingency customer contacts during the next annual exercise.

### **4.2. TSO Assessment**

The TSO has concluded that the revised CCMP does give effect to the CCM Regulations.

The TSO reports that the next update of the First Gas CCMP is expected to be completed to coincide with the development of the new single Gas Transmission Access Code (GTAC), which, if approved, will replace the current Vector Transmission and Maui Pipeline Operating Codes. First Gas intends for the GTAC and its associated IT-platform to be operative from 1 October 2019. First Gas also proposes to revisit notification mechanisms and the potential for increased digital utility as part of the new IT platform designed to support the GTAC.

The TSO has made recommendations to improve the efficiency and effectiveness of the processes that support the First Gas CCMP and Emergency Response Plans. These actions are all internal to the TSO and not itemised in detail in this report.

## 5. Recommendations

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

<b>Item</b>	<b>Recommendation</b>	<b>Responsible</b>
<b>1</b>	<i>Complete the outstanding action from Exercise Validation in 2015, Exercise Kakama in 2016 and Exercise Interface in 2017 to review and document the rationale for each pressure threshold.</i>	TSO
<b>2</b>	<i>Investigate OATIS contact details reporting to ensure that all contacts categorised as Miscellaneous Contacts for CCM Regulations notification are included in the report and successfully receiving notices.</i>	TSO
<b>3</b>	<i>Revisit critical contingency notification mechanisms and increase digital utility as part of the new IT platform designed to support the new GTAC.</i>	TSO
<b>4</b>	<i>Modify the process for posting notices on OATIS to clearly state that it is an instruction from the TSO and the TSO is notifying Retailers and Large Consumers to follow the instruction.</i>	TSO
<b>5</b>	<i>List the TSO staff with an understanding of the CCM regulations and associated processes that it may appoint as System Control Liaison Officer and confirm with the CCO.</i>	TSO
<b>6</b>	<i>Finalise and test the First Gas Crisis Communications Plan to ensure external communications relating to CCM Regulations are well managed.</i>	TSO
<b>7</b>	<i>Review 3209245 Process for First Gas Asset Owner Statement Under CCM Regulations and its application to ensure external communications relating to CCM Regulations are well managed.</i>	TSO
<b>8</b>	<i>All Retailers to ensure they test a sample of their critical contingency customer contacts during the next annual exercise.</i>	Retailers
<b>9</b>	<i>Consider Retailer and Large Consumer feedback on the Compliance Update template and make changes if necessary.</i>	TSO
<b>10</b>	<i>Nova Energy to draft a media release, if relevant, as a part of next year's exercise if they are not a signatory to the Retailers Communications Protocol.</i>	Nova Energy

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## 6. Pre-Test Exercise Audit of TSO by CCO

The pre-exercise elements were audited on the 3 May 2018 (6 days prior to the actual exercise date). All items were audited by holding a pre-arranged interview with the First Gas System Control Manager.

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

#### 6.1.1. Thresholds:

Three previous annual exercise pre-audits have made recommendations that the rationale for each threshold be documented to clearly establish whether each threshold is still representative for that part of the system or whether it needs to be reviewed considering any system changes. The TSO has made some progress on this action however it has yet to be fully completed. Thus, the action from Exercise Validation, Exercise Kakama and Exercise Interface to document the rationale for each pressure threshold remains outstanding.

#### *Recommendation:*

1. *Complete the outstanding action from Exercise Validation, Exercise Kakama and Exercise Interface to document the rationale for each pressure threshold.*

#### 6.1.2. SCADA System Alarms

The CCO checked the threshold alarm settings in SCADA and found them to be correct.

#### 6.1.3. Threshold information:

The previous annual exercise highlighted time delays with the SCADA data transfer process and recommended that the data files be posted to the cloud to minimise delays. SCADA data files have been made available to the CCO via the cloud since February 2018. As a result, the data files are available to the CCO quicker than with the previous SFTP process.

### 6.2. 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 the TSO considers may feasibly result in a breach of the thresholds and 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).

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

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

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

Copies of the First Gas and Maui 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 the 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 must access the notices on the OATIS website. The following observations are made from a review of both lists:

- *There are organizations listed in Appendix 4 of the CCMP that are not listed on the contact lists (First Gas, Bay of Plenty Energy, Origin Energy, TAG Oil, Cheal Petroleum, Westside NZ Ltd, Fonterra)*
- *There are email addresses that are no longer relevant – particularly associated with Maui Development Ltd.*
- *The listed emails appear to be more up to date than for previous audits*

The TSO subsequently advised that OATIS does contain contact details for the majority of the organisations that have been indicated as missing from OATIS. The OATIS report provided to the CCO does not appear to be picking up the “Miscellaneous Contacts” category in OATIS where a number of these entities’ contact details are stored. These Miscellaneous Contacts in OATIS were all contacted prior to the test exercise by the TSO to ensure that contact details were accurate and current.

The TSO will investigate an amendment to the OATIS report to ensure that all contacts are captured and contact a sample to ensure they received notices during the exercise.

Some of the email addresses that are considered “no longer” relevant are likely to be because of historical contracts on OATIS that need to be maintained for record keeping purposes. Again, the TSO will investigate whether these can be excluded for the contact report that is generated daily and provided to the CCO in this pre-audit context.

The CCO concludes that the findings from this pre-exercise audit are an improvement on the findings from previous audits. However, management and maintenance of the contact lists remains as an opportunity for improvement when the OATIS replacement system is introduced.

#### **Recommendations:**

- 2. Investigate OATIS contact details reporting to ensure that all contacts categorised as Miscellaneous Contacts for CCM Regulations notification are included in the report and are successfully receiving notices.***
- 3. Revisit critical contingency notification mechanisms and increase digital utility as part of the new IT platform designed to support the new GTAC.***

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## 7. TSO Exercise Test Criteria and Observations

### 7.1. 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 CCMP. A summary of the notices issued by the CCO to the TSO and by the TSO to relevant parties are included in Appendix C.

The CCMP states that *“In the interest of timely notification, First Gas elects to create a PDF of the notice issued by the CCO and attaches it to the published OATIS notice”*. This approach has been adopted for several years and is reinforced by the CCO during the annual industry training.

As with the exercise last year, one exercise participant indicated that this approach can cause confusion and suggested that the notice on OATIS should clearly state that *“This is an instruction from the TSO”*.

#### **Recommendation**

- 4. TSO to modify its process for posting notices on OATIS to clearly state that it is an instruction from the TSO and the TSO is notifying Retailers and Large Consumers to follow the instruction.**

### 7.2. 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 the TSO 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 of the First Gas CCMP.

### 7.3. 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 Officer. The Duty Officer became the Incident Controller.

The communications plan also recognises that during a significant event, the Incident Controller would have significant communication demands for several stakeholders and as such may not be able to provide sufficient, timely information to the CCO. For such events, the TSO has established a System Control Liaison Officer role to be the key contact for the CCO. This was practiced for the exercise and as a result

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there were occasions when the CCO was communicating with either or both the Incident Controller and the System Control Liaison Officer. The CCO considers that direct communications between the Incident Controller and the CCO were the most effective. The exercise highlighted that if the System Control Liaison Officer role is going to be the key contact for the CCO then the person in that role must have a good appreciation of the requirements of CCM Regulations.

**Recommendation:**

- 5. List the TSO staff with an understanding of the CCM regulations and associated processes that it may appoint as System Control Liaison Officer and confirm with the CCO.**

**7.4. 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 5.6 and Appendix 11 of the First Gas CCMP details the steps taken for considering alternative restoration arrangements. In this exercise, the demand restoration process was not tested.

**7.5. 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 VTC respectively. This section also describes how First Gas will properly integrate the contingency imbalance regime prescribed in the CCM Regulations with First Gas's business-as-usual regime under section 8 of the Vector Transmission Code (VTC).

As the CCO determined that the facts of Exercise Paparua constituted a "regional" critical contingency, no critical contingency imbalances would have been calculated after the termination of the event.

**7.6. 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. The exercise 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 the Communications Protocol were needed and therefore not tested. Overall, the communication processes used were consistent with those described in the CCMP.

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**7.7. 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 and sets out the conditions under which the TSO 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. A potential critical contingency was declared as part of the exercise.

**7.8. Is the CCMP consistent with the MPOC and VTC? [r25(2)]**

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

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## **8. CCO Exercise Test Criteria and Observations**

### **8.1. 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 a section of the Maui pipeline was at risk due to a large landslip and although pipeline pressure had not been affected a pressure reduction would be likely so CCO elects to declare a potential critical contingency and subsequently issued a notice at 09:45.

At 10:25 the TSO advised that pipeline isolation and depressurisation is required. Timeframe to remedy was not known. The CCO verified with the TSO that isolating the pipeline would result in the pressure threshold at Rotowaro being breached. The CCO determined that a breach of pressure threshold was unavoidable and gave urgent notice to the TSO that a critical contingency was being declared at 10:30 on 9 May 2018 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.

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

The exercise scenario required isolation of a section of the First Gas Maui pipeline resulting in the entire system downstream of the isolation point being isolated from a significant source of gas supply. The TSO advised that they would reconfigure the Kapuni Central Pipeline to flow gas north. However, capacity of this pipeline is significantly less than the Maui pipeline and would not be able to support current demand levels.

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

### **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 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, several of the steps were circumvented and the review of the draft notices prepared by the CCO worked 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.

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

Given the uncertainty of the estimated time to repair, the CCO issued instructions at 11:15 for curtailment to Band 4 to remove the large loads from the system. Subsequent discussions with the TSO confirmed

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the capacity of the Kapuni Central pipeline and repair times for the Maui pipeline. As a result, the CCO determined that curtailment to Band 6 would be required and curtailment instructions to that effect were given at 12:43.

There was a well-reasoned approach to determining proposed curtailment and exploring alternative supply, bolstered by checking with the TSO and obtaining clear agreement.

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

The exercise was terminated before the need for a termination notice arose due to the scenario requiring a two-week 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. The SCADA Data File Transfer Process provides data files for the load model. During events, files are provided at 20-minute intervals. In addition, the TSO is 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 helps eliminate any delays associated with the SCADA Data File Transfer Process.

During the exercise, when the TSO switched the SCADA data files to “event” mode at the CCO’s request, three files that were provided within the first 20 minutes were not compatible with the CCO Load Model. This issue was raised with the TSO and although the reason for the files being corrupted is not clear, the issue was quickly resolved with correct files being provided.

#### **8.7. 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.

At 12:00, the CCO requested the TSO to provide information relating to the estimated time of repair that the CCO could use for its Status Update Notice that was required to be published by 13:00.

The TSO procedure *3209245 Process for First Gas Asset Owner Statement Under CCM Regulations* was utilised by the TSO for the TSO and CCO to jointly review the content of proposed media statements to ensure consistency and accuracy of content.

Subsequently, the TSO’s System Control Liaison Officer provided the CCO with a completed draft Public Statement Template for discussion/comment. The CCO considered that the content of the template was not suitable for a public statement as it contained contradictory information to previously issued CCO notices and provided comments accordingly.

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In addition, the CCO received a Draft Media Statement from the TSO's External Communications role. The CCO considered that statement also contained some errors and contradictory information to previously issued CCO notices and provided comments accordingly.

The CCO prepared a public statement compliant with Schedule 5 and verified the content with the TSO prior to publishing it at 13:24. The timing of this notice was outside of the 13:00 deadline set in schedule 5 because, for the purpose of the exercise, the CCO allowed the process to run over time so the learnings could be established.

At 14:54, the TSO published a media statement to be compliant with Schedule 5 (refer Appendix D). This media statement contained some errors and information that was contradictory to information issued previously by the CCO and in the Retailers Media Appeal.

**Recommendations:**

- 6. Finalise and test the First Gas Crisis Communications Plan to ensure external communications relating to CCM Regulations are well managed.***
- 7. Review 3209245 Process for First Gas Asset Owner Statement Under CCM Regulations and its application to ensure external communications relating to CCM Regulations are well managed.***

Similarly, the CCO had instructed Retailers to issue media appeals requesting domestic gas users to conserve gas. The Lead Retailer (Trustpower) prepared and issued a Media Release in accordance with the current Gas Retailers Communications Protocol.

The statement issued was consistent with the CCO notices and statements. The preparation and issue of this media appeal was a significant improvement on previous exercises. It only contained one minor error in referring to a Retailer that is not a signatory to the protocol. This error has subsequently been addressed.

## **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 observers concluded that the CCO had performed to the required performance standards.

## **9. Retailers and Large Consumers Exercise Test Criteria & Observations**

### **9.1. Participation**

All Retailers were requested to participate in the exercise and issued with a Participants Briefing on 23 March 2018.

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As part of the exercise, Retailers were required to undertake such testing to confirm that the processes that support their certified Retailer Curtailment Plan, which ensure that the list of emergency contact details maintained in accordance with regulation 43 is current. Testing should include sampling of both longstanding and recently-acquired customers to confirm completeness and accuracy of contact details. 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 an optional Test Report Template for Retailers to use (Appendix F).

All Retailers subsequently provided the required reports and all participants have identified some areas for improvement in their processes and considered the exercise a good learning opportunity. The key learnings from these reports have been incorporated into the recommendations.

Large Consumers also participated in the exercise. Two were affected by the exercise scenario and were observed to respond in accordance with the requirements of the CCMP. Other large consumers not directly affected by the scenario took the opportunity to run through their processes and procedures as though they had been affected.

## **9.2. Ensure the Retailer curtailment plan contains 24/7 contact information for each consumer installation [r43]**

All Retailer Curtailment Plan Testing Reports received reported processes for holding and maintaining emergency consumer contact details.

Only one Retailer elected to contact a sample of consumers to test that the details they held were correct. The remaining Retailers elected not to contact any Consumers and placed full reliance on their business as usual process for capturing and maintaining consumer contact details. The CCO subsequently enquired as to why they did not contact consumers. Reasons given included:

- *“We usually communicate instructions with a selection of gas customers, however didn’t have anyone available to make phone calls this exercise unfortunately.”*
- *“We have in the past, and had confused understanding of what the test means, as in they were actually responding, even though we stressed it was a test.”*
- *“Our legal team advice was for us not to contact the customers directly. We tested the broadcast using internal staff mobiles and email address to ensure the process works.”*

It is a specific part of the purpose of the annual exercise, specified in regulation 34 (1) (c), to test that the list of emergency contact details maintained by retailers in accordance with regulation 43 is current. Without the testing of at least a sample of retailer contacts, a key part of the effectiveness of the annual exercise is lost. While the risk of miscommunication is acknowledged, Retailers do not need to explain the exercise scenario, they can simply state that they are testing that they have the correct contact for issues related to gas supply.

The CCO would ask Retailers to put plans in place, which mitigate any of their concerns, so they are able to test a sample of their contacts during the next annual exercise.

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**Recommendation:**

- 8. All Retailers ensure they test a sample of their critical contingency customer contacts during the next annual exercise.**

### **9.3. Ensure the Retailer has up to date curtailment band information for each consumer [r43]**

Retailers reported their consumers by band in both their testing reports and in their curtailment compliance updates during the exercise.

### **9.4. Retailers and large consumers to provide regular updates to TSO [r55]**

Retailers and Large Consumers provided curtailment compliance updates to the TSO using their Combined Large Consumer and Retailer Update Template. These were subsequently consolidated by the TSO into a single update and provided to the CCO. There were a few issues with completing the template provided by the TSO and some Retailers subsequently provided feedback that the template could be simplified and made more user-friendly.

**Recommendation:**

- 9. Consider Retailer and Large Consumer feedback on the Compliance Update template and make changes if necessary.**

### **9.5. Retailers to give urgent notice to their consumers affected by a CC direction [r56]**

All Retailers reported processes for contacting consumers and one Retailer contacted a sample of their consumers to check contact details were correct.

Retailers have a range of processes and procedures for contacting consumers to issue curtailment instructions which are generally commensurate with the number of consumers serviced. The exercise again highlighted that the time taken for Retailers to contact all consumers can vary significantly. One Retailer has recognised the need to explore mass messaging options because of the exercise.

### **9.6. Retailers to Implement Media Appeals [r53]**

The following Retailers are signatories to the Gas Retailers Communications Protocol: Trustpower, Contact Energy, Energy On-line, Genesis Energy, Mercury, Pulse Energy and Switch Utilities.

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 2018 is held by Trustpower.

After curtailment instructions for Band 6 had been given, Trustpower took the proactive step of preparing a draft media release in the event it may be required. When the CCO subsequently issued instruction to Retailers to implement media appeals, Trustpower were quickly able to respond to this instruction with a final media release. This process was a significant improvement on previous exercises.

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There was one error on the media release. It listed Nova Energy as one of the signatories to the Protocol which is not the case. Nova Energy did not draft a media release as part of the exercise.

***Recommendation:***

- 10. Nova Energy to draft a media release, if relevant, as a part of next year's exercise if they are not a signatory to the Retailers Communications Protocol.***

## **10. Asset Owners Exercise Test Criteria and Observations**

### **10.1. 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.

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## Appendix A – Exercise Injects

### 9:00am 1<sup>st</sup> inject from Exercise Control – Exercise Initiation.

A Field Technician contacts Gas Control via telephone to report a large slip north of Gilbert Stream, on the seaward side of the pipeline. At least 15 metres of the Maui pipeline is exposed at the location of the slip, possibly more. The location of the slip is approximately 5694429N; 1732038E.

### 9:45am 2<sup>nd</sup> inject from Exercise Control.

The Field Technicians have reported back to Gas Control that they are each in place at the Pukearuhe and Mokau Inlet MLVs.

The Field Technician at the Gilbert Stream slip location calls back to ask if he needs to stay on site, and updates to say the slip area appears very unstable and it looks like more may slip away.

### 10:00am 3<sup>rd</sup> interject from Exercise Control.

The Pipeline Integrity Engineer has suggested carrying out engineering assessment to determine if the pipeline can self-support.

### 10:20am Additional Information:

Approximately 30 minutes after the MLVs are closed, the following parameters are indicated on the SCADA:

Time-to-Pressure Threshold at Rotowaro	3.4 hrs
Taranaki Target Pressure	Rising, and now at 49.9barg

### 4<sup>th</sup> inject from Exercise Control.

Engineering return to the Incident Controller and state that the pipeline is not self-supporting over this length and needs repair before going back in to service. The Engineer also recommends to the Incident Controller that the pipeline needs depressurisation immediately.

### 5<sup>th</sup> inject from Exercise Control.

Engineering return to the Incident Controller and state that the repair is likely to take 7-10 days, based on working 24-hour days.

## 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.

<b>Event:</b>	<b>Exercise Paparua</b>	<b>Date:</b>	<b>09/05/2018</b>
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Time	From	To	Details
09:00	Exercise Control	All Participants	Exercise Paparua has commenced – email & SMS Website updated to reflect exercise commenced
09:02	Exercise Control	Gas Control	1 <sup>st</sup> Inject issued.
09:05	Gas Control	CCO	Gas Controller sends SMS to CCO requesting Duty CCO to contact Gas Control
09:08	CCO	TSO DO	CCO contacts Gas Control and is briefed on event by TSO Duty Officer. Duty Officer advises that Emergency is being declared. Pressure thresholds not currently affected but pressure reduction would be likely so CCO declaring a potential CC. CCO requested SCADA data be switched to Event Mode and Security of Supply alert. CCO advised intention to issue Potential CC notice while further information on situation was obtained.
09:20	TSO	TSO ER Team	TSO ER Team established. Roles allocated. System Control role to provide SoS Alerts to CCO. CCO not included in briefing.
09:30	TSO	CCO	SoS Alert #1 issued. Very light on details. No information on impact on pressure thresholds. No Duty Officer contact details.
09:35	TSO	<b>CCO</b>	SCADA Data Event Mode files not provided correctly. Three files provided since the 8.00am file incorrect and not able to be used in CCO Load Model.
09:35	CCO	TSO	Draft Potential CC issued to Duty Controller for review.
<b>09:45</b>	<b>CCO</b>	<b>TSO &amp; Stakeholder</b>	<b>Potential Critical Contingency Declaration notice CC-0044 emailed to TSO &amp; Stakeholders.</b>
09:45	CCO	Electricity System Operator	Explained we have a potential CC. If CC occurs and curtailment is required will affect Huntly and Te Rapa Cogen, Taranaki generation unaffected. They will investigate importance of Huntly to system
09:50	CCO	Huntly Power Station	Established GT running; cold start in progress on unit 1 rankine; unit 2 rankine not in use. If there is a CC and curtailment of Huntly is required would like gas to transfer unit 1 to coal, but not needed for unit 2. If no gas available can use LPG instead and run igniters.

Time	From	To	Details
09:55	CCO		Declaration notice CC-0044 published on website.
09:53	TSO	Interconnected Parties	OATIS (Maui) New Critical notice ID 43147 "Exercise Paparua – Potential Critical Contingency Declaration Notice CC-0044" - Action Required
09:58	CCO		SMS text advising CC-0044 has been issued.
09:58	TSO	Interconnected Parties	OATIS (Vector) New Critical notice ID 43148 "Exercise Paparua – Potential Critical Contingency Declaration Notice CC-0044" - Action Required
10:00	Electricity System Operator	CCO	Has run a schedule for the scenario, would result in shortage of power due to other outages. ESO would put out a deficit notice. Prudent to switch Huntly rankine to coal.
10:01	TSO	Interconnected Parties	OATIS (Maui) New Critical notice ID 43149 "Exercise Paparua – Potential Critical Contingency Declaration Notice CC-0044" - Action Required – Repeat of Notice 43147.
10:06	CCO	Refining NZ	Ensured they were aware of potential CC and were looking for CC/curtailment notices
10:08	TSO	Interconnected Parties	OATIS (Maui) New Critical notice ID 43150 "Exercise Paparua - MPOC Sec 15.1 Curtailment - North of Mokau Compressor Station - Intraday 1 Wednesday 9th May 2018" - Action Required
10:12	CCO	Gas Industry Company	Ensured GIC were aware of potential CC.
10:14	TSO	CCO	SoS Alert #2 issued.
10:15	TSO	Interconnected Parties	OATIS (Vector) New Critical notice ID 43151 "Exercise Paparua - MPOC Sec 15.1 Curtailment - North of Mokau Compressor Station - Intraday 1 Wednesday 9th May 2018" - Action Required
10:25	TSO	CCO	<p>Briefing on current situation. CCO advised that pipeline isolation and depressurisation is required. Timeframe to remedy not known, but initial thoughts from discussion “we’re in the weeks rather than days”</p> <p><b>CCO determines that breach of Rotowaro pressure threshold is unavoidable and TSO concurs.</b></p> <p><b>CCO gives urgent notice (oral) to TSO that Critical Contingency is now being declared at 10:30 on 09 May 2018 and written notice will be issued as soon as possible.</b></p> <p><b>CCO commences preparing CC Declaration Notice.</b></p> <p>TSO to reconfigure Kapuni Central Pipeline to flow gas north. However, capacity significantly reduced – circa 10-13scms.</p>
10:35	CCO	TSO	<p>Printed copy of draft declaration notice issued for review. TSO concurs with content and initials.</p> <p>CCO advises that it would be good for CCO to be involved in the ER Team update sessions</p>
10:41	TSO	CCO	SoS Alert #3 issued.

Time	From	To	Details
10:41	CCO	TSO & Stakeholder	<b>Declaration notice CC-0045 emailed to TSO &amp; Stakeholders.</b>
10:45	CCO		Declaration notice CC-0045 published on website.
10:48	CCO		SMS text advising CC-0045 has been issued.
10:53	CCO	Electricity System Operator	We do now have a CC. Are going ahead with discussed plan to curtail Huntly and Te Rapa but will allow gas for Huntly unit 1 to switch to coal. No ETA to pipeline repair yet available but prepare for days rather than hours.
10:53	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 43152 "Exercise Paparua - Critical Contingency Declaration Notice - CC-0045" - Action Required
10:56	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 43153 "Exercise Paparua: Critical Contingency Declaration Notice - CC-0045" - Action Required
10:56	CCO	Huntly Power Station	There is now a CC. Curtailment notice is being drafted per discussion, they will receive Electricity designation of 1.2 TJs for cold starting unit 1. No ETA for pipeline repair yet but prepare for days rather than hours.
11:05	TSO	CCO	TSO ER Team Briefing. Time to repair not yet known but repairs not insignificant. CCO proposed initial load curtailment to Band 4 while repair duration is established. CCO to prepare Curtailment Notice.
11:08	TSO	CCO	SoS Alert #4 issued.
11:15	CCO	TSO & Stakeholders	<b>Demand Curtailment notice CC-0046 emailed to TSO &amp; copied to Stakeholders.</b>
11:18	CCO		Curtailment notice CC-0046 published on website.
11:19	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 43154 "Exercise Paparua - MPOC Sec 15.1 Curtailment - Intraday 2 Wednesday 9th May 2018" - Action Required
11:20	TSO	CCO	ER Team briefing session. TSO advised that isolations were complete, and the at-risk section pressure decreased to 30bar. Still no clear timeframe for event repairs. CCO Status update would need to go out at 1:00pm so CCO will need information from TSO as part of that process. Also reminded TSO we should be getting compliance updates at 12:30pm.
11:22	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 43155 "Exercise Paparua - MPOC Sec 15.1 Curtailment - Intraday 2 Wednesday 9th May 2018" - Action Required
11:22	CCO	Stakeholders	SMS text advising CC-0046 has been issued.

Time	From	To	Details
11:24	TSO	Interconnected Parties	OATIS (Maui) New Critical notice ID 43156 "Exercise Paparua – Direction to Curtail Demand Notice CC-0046" - Action Required
11:26	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 43157 "Exercise Paparua - Direction to Curtail Demand Notice - CC-0046" - Action Required
11:40	TSO	CCO	SoS Alert #5 issued.
11:58	Greymouth	CCO	Curtailment compliance update provided to CCO instead of Critical Compliance. Forwarded to Critical Compliance
12:00	TSO	CCO	ER Team briefing session. TSO Advised venting underway. Timeframe to repair advised as 7 to 10 days (timeframe to gas back on ... add 3 days). Emphasised info needed to support the public status update – our deadline 1:00pm. CCO advised that we would need to increase curtailment to include bands 5 and 6 for the pipeline to survive out to the 13/14-day period. 200-line would be able to support domestics (actually failed to mention critical care).
12:05	TSO	CCO	Maui Pipeline schematic showing isolation points provided.
12:43	CCO	TSO & Stakeholders	<b>Revised Demand Curtailment notice CC-0047 emailed to TSO &amp; copied to Stakeholders.</b>
12:45	TSO	CCO	TSO provides CCO with document “3209245 Process for First Gas Asset Owner Statements under CCM Regulations 2” containing proposed public statement. CCO provides feedback. No description of area affected. Contradictory statements “Repair options being evaluated” v detailed breakdown of repair plan. CCO provides TSO with hard copy of draft CCO Status Update Notice.
12:45	Critical Compliance	CCO	First update on Large Consumers and Retailers compliance with curtailment instructions. Update showed Refining NZ still consuming gas at normal rate. Incorrect use by Refining NZ but also Template format is not optimal. Gas Control/System Control not cc'd on update.
12:45	TSO	CCO	ER Team briefing session. CCO communicated that the current wording we are using for the timeframe was 13 to 14 days for the supply of gas to be returned (as there were a few different timeframe wordings being used in draft TSO media statement). Also requested follow up on compliance updates (aggregated version) – hadn't seen it come through at that stage.
12:50	CCO		Revised Demand Curtailment notice CC-0047 published on CCO website
12:51	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 43158 "Exercise Paparua - Direction to Revise Demand Curtailment Notice - CC-0047" - Action Required

Time	From	To	Details
12:52	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 43159 "Exercise Paparua - Direction to Revise Demand Curtailment Notice CC-0047" - Action Required
12:52	CCO	Stakeholders	SMS text advising Revised Demand Curtailment CC-0047 has been issued.
13:05	TSO (Media)	CCO	First Gas Draft Media Statement sent. CCO identifies components of draft media statement that can be utilised in CCO Status Update Notice and begins preparing notice. Some errors in content; "pipeline will be isolated" but SoS Alert #5 stated pipeline had been isolated. "unable to say how long" but previous draft stated 13-14 days.
13:10	TSO	CCO	SoS Alert #6 issued.
13:16	CCO	Electricity System Operator	Gave update on estimated time to repair as approximately 13 days.
13:17	CCO	Huntly Power Station	Confirming they have ceased using gas for turbine and are switching unit 1 to coal. Advised ETA for pipeline repair approx. 13 days.
13:21	Trustpower (Lead Retailer)	CCO	Draft Retailer Media Release issued in anticipation that media appeals may be required. Release mentioned Nova Energy as a signatory which is not the case.
<b>13:24</b>	<b>CCO</b>	<b>Stakeholders</b>	<b>Status Update notice CC-0048 emailed to Stakeholders &amp; copied to TSO.</b> (Two copies of .pdf attached to email in error.)
13:28			Status Update notice CC-0048 published on CCO website
13:29	TSO Duty Officer	CCO	TSO provides CCO with document "3209245 Process for First Gas Asset Owner Statements under CCM Regulations 2". Referenced as Update #3 and requesting review and comment. Document contains contradictory information. CCO not clear on intent of this document.
13:30	CCO	Stakeholders	SMS text advising Status Update CC-0048 has been issued.
<b>13:32</b>	<b>CCO</b>	<b>Refining NZ</b>	Confirmed they had actioned curtailment.
<b>13:33</b>	<b>CCO</b>	<b>Retailers</b>	<b>Request to Implement Media Appeals notice CC-0049 emailed to Retailers &amp; copied to Stakeholders.</b>
13:34	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 43166 "Exercise Paparua - Critical Contingency Status Update Notice - CC-0048" - Action Required
13:34	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 43167 "Exercise Paparua - Critical Contingency Status Update Notice - CC-0048" - Action Required
13:36	CCO		Request to Retailers to Implement Media Appeals notice CC-0049 published on CCO website

Time	From	To	Details
13:38	CCO	Stakeholders	SMS text advising Request to Implement Media Appeals notice CC-0049 has been issued.
13:47	Critical Compliance	CCO	Second update on Retailers compliance. Refining NZ still showing as consuming gas.
13:56	Trustpower (Lead Retailer)	CCO	Notification of proposed conference with signatory Retailers.
13:58	TSO	CCO	SoS Alert #7 issued.
14:00	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 43168 "Exercise Paparua - Critical Contingency Status Update Notice to Retailers to Implement Media Appeals - CC-0049" - Action Required
14:01	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 43169 "Exercise Paparua - Critical Contingency Status Update Notice to Retailers to Implement Media Appeals - CC-0049" - Action Required
14:40	Trustpower (Lead Retailer)	CCO	Media Release issued. Reference to Nova Energy as signatory.
14:51	Critical Compliance	CCO	Third update on Retailers compliance. Refining NZ still showing as consuming gas.
14:55	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 43170 "Exercise Paparua - First Gas Media Release: Draft Media Release 9 May 2018" - Action Required. Published as "Draft" Media Release. Information contradictory to actual situation. No changes to Draft sent to CCO at 13:05.
14:56	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 43171 "Exercise Paparua - First Gas Media Release: Draft Media Release 9 May 2018" - Action Required
15:03	Trustpower (Lead Retailer)	CCO	Trustpower advise CCO that First Gas Draft Media statement is contradictory to their Media Appeals. CCO concurs and notifies TSO.
15:16	Exercise Control	All Participants	Email to all participants to advise that Exercise Paparua has ended.
15:20	CCO		Website updated to reflect Exercise Paparua has ended.
15:23	CCO	Stakeholders	SMS text advising that Exercise Paparua has ended.
15:54	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 43172 "Exercise Paparua - Exercise Termination." - Action Required
15:41	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 43173 "Exercise Paparua - Exercise Termination." - Action Required
16:00	Exercise Control		Exercise Paparua debrief with participants.

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## Appendix C – Notice Summary

All CCO notices can be viewed in full on [www.cco.org.nz](http://www.cco.org.nz) – Historical Events

All First Gas TSO notices can be viewed on [www.oatis.co.nz](http://www.oatis.co.nz) – First Gas Information Exchange, using ‘Notice Search’ button and begin date of 09/5/18

### Notices to TSO

Time of CCO e-mailed Notice to TSO	Notice ID	Notice Type	Time TSO Published CCO Notice	
			OATIS (Maui)	OATIS (First Gas)
09:45	CC-0044	Potential Critical Contingency	09:53	N/A
10:41	CC-0045	Critical Contingency Declaration	10:53	10:56
11:15	CC-0046	Direction to Curtail Demand	11:24	11:26
12:43	CC-0047	Revised Demand Curtailment	12:51	12:52
13:24	CC-0048	Status Update	13:34	13:34
13:33	CC-0048	Retailers to Implement Media Appeals	14:00	14:01

The exercise was ended without moving through the restoration or termination phases.

## **Exercise Paparua**

### **Draft Media Release 9 May 2018**

Plans have been activated to close the Maui gas pipeline after a landslip exposed a section of pipeline on the North Taranaki coastline.

About 15 meters of the pipeline has been left suspended in the air on the coast near Gilbert Stream near the Whitecliffs walkway on Pukearuhe Rd about 30 kilometers north of New Plymouth.

The pipeline is owned and operated by FirstGas and Chief Executive Paul Goodeve says the industry Gas contingency plan has been activated.

The affected section of pipeline will be isolated and de-pressured and contingency plans are being activated to reduce supply in a controlled manner.

Remediation will start as soon as it is safe – in the meantime we're assessing the situation and gathering information.

Our primary focus at this stage is the safe and controlled shutdown of the Maui pipeline. There is enough storage and an alternate smaller supply line to ensure residential customers are not affected, but supplies to large consumers will be affected and they have been notified so they can respond accordingly.

Supplies to the lower half of the North Island south of Taranaki and Hawkes Bay will not be affected.

We're unable to say at this stage how long the pipeline is likely to be affected.

First Gas has informed the Department of Conservation that administers the land and the Regional Council. The area has been closed to the public and we're notifying adjacent landowners.

Our priority is to resume normal supplies as quickly and as safely as possible. At this stage, we can't say what that will involve or how long that will take – that is also what we're working on at the moment.

“We are working with the industry body and will provide further updates once we have more information and our website will be updated regularly.”

For More Information:

XX xxxxxxxx  
0800 347 784

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## Exercise Paparua

### About the Maui Pipeline

The 309 km (of mostly 750mm diameter pipe) extending from Oaonui, in south west Taranaki, to Huntly. Known as the 'Maui pipeline'.

A total of 2,196 km (of mostly 100mm to 200mm diameter pipes) generally radiating from the Maui pipeline and delivering gas throughout the North Island.

The gas transmission systems traverse some of the North Island's most rugged terrain and has a good reliability record over 40 years of operation.

In that time, there have been five significant outages, two of them caused by third party damage, one by severe flooding and two by landslips.

The rupture of the Kapuni North pipeline at Pukearuhe on the North Taranaki coast in 1977, due to a slow moving landslip.

The rupture of the Kapuni North pipeline near Inglewood, Taranaki, circa 1985, due to being struck by a mechanical digger.

The rupture of the Kapuni South pipeline at Himatangi in the lower North Island in 2003, due to being struck by a bulldozer.

The forced shutdown of the Hawke's Bay pipeline at Awapuni in 2004, when it became detached from a bridge that was swept away during severe flooding in central and lower areas of the North Island.

The rupture of the Maui pipeline at Pukearuhe, near the 1977 Kapuni pipeline failure site, in 2011, due to a slow moving landslip.

The longest outages, 5-6 days, have been Hawke's Bay (2004) and Maui (2011) – (note: duration of the 1977 Kapuni pipeline failure at Pukearuhe not known)

**This is a fictitious exercise for training purposes only**

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## **‘EXERCISE PAPANUA’**

Retailers Media Release – NB: **EXERCISE ONLY – NOT FOR RELEASE**

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

A major land slip just north of Gilbert Stream, Pukearuhe in North Taranaki has exposed approximately 15 metres of the Maui Pipeline, and has caused a shortage of gas supplies in all areas north and east of Pukearuhe, North Taranaki including Waikato, Bay of Plenty, Auckland and Northland.

In response to the critical contingency emergency, all commercial and industrial gas consumers have already been directed to cease using gas. As the gas supply system has not stabilised, gas retailers are now asking domestic consumers to reduce their gas usage to a minimum until further notice.

Any commercial consumers who have not yet been contacted by their retailer should cease using gas in anticipation of being directed to do so by their retailer. These conservation measures are designed to extend the availability of gas for as long as possible while efforts are made to restore normal supplies. New information will be provided as it comes to hand.

Please note that we do not want consumers to turn off the service valve at their gas meter. All we are seeking is that consumers reduce their use of gas as much as possible by not using their gas appliances (for example, gas-fired heaters, stoves/hobs, and hot water) or only using them sparingly.

Gas retailers are contacting critical care customers (such as rest homes) who may have particular dependency on their gas supply, and will continue to monitor the situation and give these customers all the help they can. Critical care customers are not required to reduce gas consumption.

This message is provided by the following retailers – Contact Energy, Energy On Line, Genesis Energy, Mercury, Pulse Energy, Switch Utilities, Nova Energy and Trustpower.

ENDS.

## **KEY INFORMATION**

Retailers are requesting that all consumers in all areas north and east of Pukearuhe, North Taranaki including Waikato, Bay of Plenty, Auckland and Northland reduce gas consumption immediately.

For all media queries please contact Trustpower Internal Communications and Media Advisor, on 027 ....., or by emailing [media@trustpower.co.nz](mailto:media@trustpower.co.nz).

## Appendix E – Retailer Curtailment Plan Test Report Template

<b>Retailer Name:</b>								
Date Retailer Curtailment Plan last updated:								
Date consumers were last notified of the existence of the critical contingency regulations as set out in regulation 44.								
<b>Curtailment Bands:</b>		<b>3</b>	<b>3CP</b>	<b>4</b>	<b>4CP</b>	<b>5</b>	<b>6</b>	<b>7</b>
1	How many consumers did you have in each of the affected bands?							
2	During the exercise, how many consumers in each curtailment band did you contact?							
3	Of those consumers contacted, how many were the correct contact details?							
4	Of those consumers contacted, how many were aware of their obligations under a critical contingency?							
5	Description of process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.							
6	Description of methods and processes in place for issuing urgent notice to consumers to curtail or restore demand in accordance with regulation 56.							
7	Comments on the levels of consumer understanding of your instructions and their obligation to comply with directions							

8	Description of process for implementing any media appeals if directed by the CCO under regulation 53(1)(db).	
9	Comments on the Retailer Compliance Update Form and process.	
10	Comments on the quality and effectiveness of your Retailer Curtailment Plan.	
11	Comments on the level of awareness and understanding of your Retailer Curtailment Plan within your organisation	
12	Comments on exercise format, lessons learnt and any planned changes or initiatives you may take identified during the exercise.	
13	What are the 'actions arising' for your organisation because of this exercise?	
14	Any other comments?	