



# CCO ANNUAL EXERCISE 2019

## Exercise Matatau

Test of the First Gas Ltd Critical Contingency Management Plan

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

June 2019

Critical Contingency Operator  
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## CONTENTS

<b>1. Introduction</b>	<b>3</b>
<b>2. Executive Summary</b>	<b>4</b>
<b>3. Exercise Scenario</b>	<b>5</b>
<b>4. Summary of Assessment against Test Criteria</b>	<b>5</b>
4.1. CCO Assessment	5
4.2. TSO Assessment	6
<b>5. Recommendations</b>	<b>7</b>
<b>6. Pre-Exercise Audit of TSO by CCO</b>	<b>8</b>
6.1. Does the CCMP provide for compliant thresholds that meet the purpose of the regulations? [r25(1)(a)]	8
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)]	8
6.3. Does the CCMP contain actions that the TSO may take to remedy any threshold breach? [r25(1)(c)]	8
6.4. Are the contact details in the CCMP current? [r25(1)(i)]	8
<b>7. TSO Exercise Test Criteria and Observations</b>	<b>9</b>
7.1. Does the CCMP have a process for demand curtailment and restoration consistent with the purpose of the regulations? [r25(1)(d)]	9
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)]	9
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)]	9
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)]	10
7.5. Does the CCMP have a process to determine the contingency imbalances? [r25(1)(h)]	10
7.6. Does the CCMP provide effective mechanisms for making information available to the CCO? [r25(1)(j), r38, Communications Protocol]	10
7.7. Is there a protocol for informing the CCO of potential CC conditions?	10
7.8. Is the CCMP consistent with the MPOC and VTC? [r25(2)]	10
<b>8. CCO Exercise Test Criteria and Observations</b>	<b>11</b>
8.1. CCO Process for determining, declaring and notifying critical contingency [r48-49]	11
8.2. CCO process for determining and declaring regional status [r52A]	11
8.3. CCO processes for issuing notices during a CC event [r51,52, 53, 59]	11

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8.4.	CCO processes for demand curtailment, exploration of alternative supply and restoration [r53]	11
8.5.	CCO process for determining and notifying termination [r60]	12
8.6.	CCO modelling of the system operates effectively and gives consistent results [r53, r38]	12
8.7.	CCO publishes information [r54A, Schedule 5]	12
8.8.	CCO performs to required standard [SPACCO Schedule 2]	13
<b>9.</b>	<b>Retailers and Large Consumers Exercise Test Criteria &amp; Observations</b>	<b>13</b>
9.1.	Participation	13
9.2.	Ensure the Retailer curtailment plan contains 24/7 contact information for each consumer installation [r43]	13
9.3.	Ensure the Retailer has up to date curtailment band information for each consumer [r43]	14
9.4.	Retailers and large consumers to provide regular updates to TSO [r55]	14
9.5.	Retailers to give urgent notice to their consumers affected by a CC direction [r56]	15
9.6.	Retailers to Implement Media Appeals [r53]	15
<b>10.</b>	<b>Asset Owners Exercise Test Criteria and Observations</b>	<b>15</b>
10.1.	The owner of the damaged or failed component publishes the required information [r54A]	15
	<b>Appendix A – Exercise Injects</b>	<b>17</b>
	<b>Appendix B – Exercise Timeline</b>	<b>22</b>
	<b>Appendix C – Notice Summary</b>	<b>27</b>
	<b>Appendix D – Retailer Curtailment Plan Test Report Template</b>	<b>28</b>

## 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.

The CCO would particularly like to thank Powerco for assisting in developing the exercise scenario and providing mock media releases to add authenticity to the exercise.

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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; 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 required by regulation 43 is current.

A test exercise, “Exercise Matatau” was carried out on 8 May 2019. The exercise required the CCO, TSO, Asset Owners, Large Consumers 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 Matatau 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 including asset owners
- 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.

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## 2. Executive Summary

Exercise Matatau 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 tested the core critical contingency phases and information flows associated with an event, such as declaration, demand curtailment and CCO public information statements. Retailers and Large Consumers were issued with curtailment instructions and provided and consumer compliance updates. The exercise also provided an opportunity for asset owners other than the TSO to consider the requirements to communicate information about failed assets (Regulation 54A).

Evidence from this exercise indicates that:

- The TSO has a clear understanding of its role and responsibilities for critical contingency events and is well prepared to respond.
- The level of engagement in the exercise by Retailers with respect to testing emergency contact details was less than optimal:
  - Only one Retailer (Vector OnGas) elected to carry out a thorough test and contact all their consumers to test that the details they held were correct.
  - Two Retailers (Trustpower and Genesis Energy) contacted a small sample of consumers.
  - One Retailer (Contact Energy) elected not to contact any consumers and placed full reliance on their business as usual process for capturing and maintaining consumer contact details.
  - One Retailer (Greymouth) advised that their Retailer Curtailment Plan was last updated for contact details in February 2019 which they consider to be current.
  - Two Retailers (Mercury Energy and Nova Energy) did not provide any feedback or evidence of testing of their consumer contact details.

All Retailers have a Retailer Curtailment Plan which sets out their process for contacting their consumers. However, it is not clear from this exercise if those processes for all Retailers are robust and have been tested.

- 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 set out in regulation 54A on asset owners to communicate information about failed assets with mixed interpretation.

The CCO concludes from this exercise that:

- The CCMP complies with regulation 25 and is effective in achieving the purpose of the regulations.
- The CCMP substantially contains the contact details required by regulation 25 and that they are current.
- The exercise provided only limited evidence to conclude that the list of emergency contact details maintained by all Retailers required by regulation 43 is current.

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- There is a level of ambiguity regarding the interpretation of regulation 54A.

This report makes recommendations in Section 5 which, if fully implemented would:

- improve the efficiency of processes and procedures to support application of the CCMP.
- improve the level of confidence that the list of emergency contact details maintained by all Retailers required by regulation 43 is current.
- resolve any ambiguity regarding the interpretation of regulation 54A and the definition of “publish information”.

### **3. Exercise Scenario**

The exercise scenario was designed and managed by the CCO. The scenario centered on a localized tornado damaging part of the Powerco 33KV and 11KV electricity network at Tikorangi in Taranaki. This caused a loss of power at the Pohokura, Kowhai, Turangi, McKee and Mangahewa Production Stations resulting in a significant reduction of supply to the gas transmission system.

The exercise required the CCO, TSO, Retailers, Large Consumer and Gas Producers to carry out tasks and activities associated with the regulations, CCMP and other relevant documents.

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

A series of exercise injects were pre-designed and issued 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. This year’s exercise included interjects to Producers and an interject to all participants, as well as interjects to the TSO.

## **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.
- provided sufficient evidence to conclude that the contact details contained in the CCMP as required by regulation 25 are substantially current.

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- provided limited evidence to conclude that the list of emergency contact details maintained by Retailers required by regulation 43 is substantially current. Only one Retailer elected to contact all their consumers to test that the details they held were correct. Two Retailers contacted a sample of consumers. One Retailer elected not to contact any Consumers and placed full reliance on their business as usual process for capturing and maintaining consumer contact details. One Retailer advised that their Retailer Curtailment Plan was last updated for contact details in February 2019 which they consider to be current. Two Retailers did not provide any evidence of testing of their Retailer Curtailment Plans.
  - highlighted differences in interpretation by asset owners other than the TSO on the obligation to communicate information about failed assets and publish information as set out in regulation 54A

The CCO has made recommendations in Section 5 to:

- improve the efficiency of processes and procedures to support application of the CCMP
- improve the level of confidence that the list of emergency contact details maintained by Retailers required by regulation 43 is current.
- resolve any ambiguity regarding the interpretation of regulation 54A and the definition of “publish information”.

#### 4.2. TSO Assessment

Exercise Matatau was the third formal test of the revised single First Gas CCMP. The TSO has concluded that the revised CCMP does give effect to the CCM Regulations, and in this regard Exercise Matatau was a successful test.

A further update of the CCMP is expected to be completed to coincide with the development of the new single Gas Transmission Access Code (GTAC), which will replace the current Vector Transmission and Maui Pipeline Operating Codes. First Gas intends for the GTAC and its associated IT-platform (TACOS) 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 TACOS system.

The TSO has made several 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>
1	<i>Complete the outstanding action from Exercise Validation in 2015, Exercise Kakama in 2016, Exercise Interface in 2017 and Exercise Paparua in 2018 to review and document the rationale for each pressure threshold.</i>	TSO
2	<i>Revisit critical contingency notification mechanisms and increase digital utility as part of the implementation of the new transmission system IT platform (TACOS) to support the new GTAC.</i>	TSO
3	<i>Modify the point of initial contact for the Ahuroa Gas Storage facility to explore opportunities for increased supply</i>	CCO
4	<i>Update CCO contacts for Kupe and Ballance.</i>	CCO
5	<i>All Retailers to ensure they test at least a representative sample of their critical contingency customer contacts during the next annual exercise and provide evidence of such testing.</i>	Retailers
6	<i>Update the Combined Large Consumer and Retailer Update Template on OATIS to include Kaimiro Delivery Point.</i>	TSO
7	<i>Consider Retailer and Large Consumer feedback on the Compliance Update template as part of the implementation of TACOS platform to support the new GTAC.</i>	TSO
8	<i>Resolve any ambiguity as to what constitutes a component of the gas supply chain that has damaged or failed under Regulation 54A with Producers.</i>	GIC
9	<i>Confirm the process for meeting the requirements of Regulation 54A in terms of publishing information.</i>	Producers

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

The pre-exercise elements were audited on the 30 April 2019 (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:

Four previous annual pre-exercise 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, Exercise Interface and Exercise Paparua to document the rationale for each pressure threshold remains outstanding.

#### *Recommendation:*

1. ***Complete the outstanding action from Exercise Validation, Exercise Kakama, Exercise Interface and Exercise Paparua 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.

### 6.2. 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.

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

Copies of the First Gas and Maui contact reports generated from 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 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 an opportunity for improvement when the new transmission system IT platform (TACOS) is introduced.

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**Recommendations:**

- 2. Revisit critical contingency notification mechanisms and increase digital utility as part of the implementation of the new transmission system IT platform (TACOS) to support the new GTAC.**

## **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 notices were 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.

### **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. The TSO identified some minor changes required to procedure 3207704.

### **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.

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**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).

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

**7.6. 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.

**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 situations 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.

**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 of the power outage affecting gas production stations. The timeframe to remedy was not known and pipeline linepack was falling at the rate of 10TJ/hr. Given the rate of pressure decay, the CCO determined that a breach of Kapuni Gas Treatment Plant pressure threshold was unavoidable and gave urgent notice to the TSO that a critical contingency was being declared at 09:27 on 8 May 2019 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 CCO determined that this scenario constituted a non-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 at the TSO premises, 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.

The notices were sent to the correct parties and stakeholders and contained the correct information and were given within required timeframes. One CCO Status Update Notice was issued with the incorrect notice number however this was identified by the TSO and quickly rectified before the notice was posted on OATIS.

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

Given the uncertainty of the estimated time to repair the electricity network, the CCO issued instructions at 10:31 for curtailment to Band 2 to remove the large loads from the system.

The TSO advised the CCO that the Ahuroa Storage Facility had ceased taking gas from the transmission system but did not have gas available to inject in to the transmission system. This highlighted that the CCO's current contacts for Ahuroa need to be updated to reflect the role of Flexgas.

The CCO contacted other Producers not affected by the exercise scenario to explore opportunities for additional supply. This highlighted that the CCO's current contacts for the Kupe Production need to be updated.

The CCO also contacted the large consumers affected by the curtailment directions to check what their shutdown profiles would be. This process was successful although it did highlight that the CCO's current contacts for Ballance need to be updated.

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**Recommendations:**

- 3. *Modify the point of initial contact for the Ahuroa Gas Storage facility to explore opportunities for increased supply***
- 4. *Update CCO contacts for Kupe and Ballance.***

When the TSO advised the CCO that the estimated time to repair the electricity network was at least 60 hours, the CCO determined that curtailment to Band 4 would be required and revised curtailment instructions to that effect were given at 11:30.

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 to three-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. 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 either by email or by copying it on to a USB stick and handing it to the CCO. 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, the delivery of files successfully changed from 1 hour to twenty-minute intervals.

#### **8.7. CCO publishes information [r54A, Schedule 5]**

The CCO had obligations to provide public statements in accordance with Schedule 5 of the regulations.

During the exercise, Producers were reminded by means of an exercise inject that Regulation 54A sets out obligations on the owner of failed assets that has contributed to the critical contingency by reducing gas delivered into the gas transmission system by 5 scms or more to communicate information.

The CCO requested affected Producers to consider how they would comply with this requirement and advise the CCO of their proposed communication and methods. It was emphasised that Producers were not required to publish any information in the public domain related to this exercise unless they chose to.

The affected Producers provided statements to the CCO which were incorporated in to the CCO Status Update Notice which was published at 12:51.

**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 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 were requested to participate in the exercise and issued with a Participants Briefing on 15 March 2019.

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).

Large Consumers also participated in the exercise and were observed to respond in accordance with the requirements of the CCMP.

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

A summary of the feedback received from Retailers affected by the exercise is shown below:

<b>Retailer</b>	<b>% of Band 3 &amp; 3CP consumers contacted</b>	<b>% of Band 4 &amp; 4CP consumers contacted</b>	<b>Processes for holding and maintaining emergency consumer contact details outlined?</b>
Vector (OnGas)	100%	98%	Yes
Trustpower	100%	0%	Yes
Genesis Energy	3%	0%	Yes
Contact Energy	0%	0%	Yes
Mercury Energy	No report received		
Nova Energy	No report received		
Greymouth	0%	0%	Yes

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Only one Retailer (Vector OnGas) elected to contact all their consumers to test that the details they held were correct. Two Retailers (Trustpower and Genesis Energy) contacted a sample of consumers. One Retailer (Contact Energy) elected not to contact any Consumers and placed full reliance on their business as usual process for capturing and maintaining consumer contact details. One Retailer (Greymouth) advised that their Retailer Curtailment Plan was last updated for contact details in February 2019 which they consider to be current. Two Retailers (Mercury Energy and Nova Energy) did not provide any feedback or evidence of testing of their consumer contact details.

A specific part of the annual exercise specified in regulation 34 (1) (c) is 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 to ensure they have the correct contact for issues related to gas supply.

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

**Recommendation:**

- 5. All Retailers to ensure they test at least a representative sample of their critical contingency customer contacts during the next annual exercise and provide evidence of such testing.**

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

Those Retailers who provided a self-assessment report confirmed their consumers by band.

### **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. Several observations with this process highlighted opportunities for improvement:

- Curtailment compliance updates for Refining New Zealand as a large consumer went to their shipper rather than the TSO. This error was recognised and corrected.
- An error was identified with the current version of the template with Kaimiro Delivery Point being omitted.
- One Retailer provided feedback that the template could be simplified and made more user-friendly.

**Recommendation:**

- 6. Update the Combined Large Consumer and Retailer Update Template on OATIS to include Kaimiro Delivery Point.**

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**7. Consider Retailer and Large Consumer feedback on the Compliance Update template as part of the implementation of TACOS platform to support the new GTAC.**

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

Those Retailers who provided a self-assessment report advised their processes for contacting consumers. One Retailer contacted all their consumers. Two Retailers 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 highlighted that the time taken for Retailers to contact all consumers would vary significantly.

**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 2019 is held by Genesis Energy.

Media appeals were not required for this exercise scenario. However, Genesis Energy took the proactive step of contacting other signatories to the Protocol and confirming contact details should media appeals have been required. Some incorrect contact details were identified which have since been corrected.

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

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

Two Producers were affected by the exercise scenario such that the loss of power from the electricity network resulted in an unplanned outage and meant that they could not supply gas to the transmission system. A third producer was affected by the power outage but reported they had back-up generators which would have meant their production would have continued.

During the exercise, the Producers were reminded that Regulation 54A sets out obligations on the owner of failed assets that has contributed to the critical contingency by reducing gas delivered into the gas transmission system by 5 scms or more to communicate information.

The CCO requested affected Producers to consider how they would comply with this requirement and advise the CCO of their proposed communication and methods. It was emphasised that Producers were not required to publish any information in the public domain related to this exercise unless they chose to.

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One Producer questioned whether their assets had “failed” and contributed to the cause of the critical contingency under this exercise scenario given that the failure of their assets was caused by a failure on the electricity supply network. The CCO considers that “failure” in this context means (for a production station) “something that unexpectedly causes the asset to stop injecting gas into the transmission system (or that unexpectedly diminishes the asset’s rate of injection)”.

The affected Producers were also asked where they would publish relevant information and advised of the GIC’s determination on the definition of publish. This being: *“For the purposes of asset owners publishing information under regulation 54A and Schedule 5, Gas Industry Co determines publish means to make available in a prominent way on a publicly available website, such as the asset owner’s public website or on the public website of an agent, such as the asset operator’s public website.”*

During the exercise it was not possible to confirm what processes Producers have in place for meeting the requirements of regulation 54A in terms of publishing information.

***Recommendations:***

- 8. Resolve any ambiguity as to what constitutes a component of the gas supply chain that has damaged or failed under Regulation 54A with Producers.***
  
- 9. Gas Producers to confirm their process for meeting the requirements of Regulation 54A in terms of publishing information.***

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## Appendix A – Exercise Injects

### 09:00am Exercise Matatau – Simulated System Conditions to All Participants

The **current simulated system** conditions for the purpose of the exercise are:

- Oaonui Production Station is shut down for maintenance all week.
- Rimu Production is shut down for maintenance all week.
- Gas is being supplied to the transmission system at the following rates:
  - Ngatimaru Rd (Receipt) 4,200 GJ/hr
  - Tikorangi #3 (Receipt) 3,100 GJ/hr
  - Tikorangi #2 1,300 GJ/hr
  - Turangi Mixing Station 1,150 GJ/hr
  - Kowhai Mixing Station 550 GJ/hr
- Mokau Compressor Station is off.
- Maui linepack is 260TJ and the pipeline is gaining 1TJ/hour
- Methanex combined total offtake from Ngatimaru Rd (Delivery), Bertrand Rd & Faull Rd is 7,000 GJ/hour
- Weather conditions are wet and very windy, and thunderstorms are forecast for the North Island.

All other gas receipts to the transmission system as per the actual rates for today.

All other user's offtake is as per the actual rates for today.

### 09:10am Inject # 1 for TSO.

SCADA indicates no-flow alarms and power failure at Pohokura, McKee, Mangahewa, Kowhai and Turangi Production Stations.

SCADA indicates power failure alarms at Tikorangi 3, Waitara DP, New Plymouth DP, Inglewood DP and McKee Mixing Station.

Methanex Motunui and Waitara Valley Plants are still flowing as per the simulated system conditions  
SCADA indicates:

- Maui linepack is 260TJ
- Net Maui linepack balance is -10TJ/hour
- KGTP Pressure Threshold is 4.5 hours to 37.5bar
- Rotowaro Pressure Threshold is 8 hours to 32barg

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**09:15am Inject # 2 for TSO:**

Gas Control is advised of an outage on the Powerco network in the Tikorangi area. There are reports of substantial damage to power lines during a severe thunderstorm. Powerco has mobilised repair crews to site but the estimated time to repair is not yet known.

SCADA indicates:

- Maui linepack is now 259TJ
- Net Maui linepack balance is -10TJ/hour
- KGTP Pressure Threshold is 4.0 hours to 37.5bar.
- Rotowaro Pressure Threshold is 6 hours to 32barg

**09:30am Inject # 1 for Producers:**

For the purpose of the exercise, you are being informed that the following gas production facilities have lost all power from the Powerco network and have ceased supplying gas to the transmission system:

- Pohokura
- Mangahewa
- McKee
- Turangi
- Kowhai

There are reports of damaged overhead power lines in the Tikorangi area. Powerco has mobilised repair crews to site but the estimated time to repair is not yet known.

Please consider how this event would impact your operations and what your response would be in relation to Critical Contingency Management.

**9:30am Inject # 1 for Transpower:**

For the purpose of the exercise, you are being informed that both 33KV and 11KV overhead power lines in the Tikorangi area have been damaged by a localised tornado which has impacted the Hurangi GXP and caused loss of power to Waitara, Inglewood and parts of New Plymouth. Gas Production Stations in the area have lost power. Powerco have mobilised repair crews to site but the estimated time to repair is not yet known.

Please consider how this event would impact your operations and what your response would be in relation to Critical Contingency Management.

**10.00am Inject # 3 for TSO**

Powerco has provided the attached Media release.

SCADA indicates:

- Maui linepack is now 249TJ
- Net Maui linepack balance is -10TJ/hour
- KGTP Pressure Threshold is 3.5 hours to 37.5bar.
- Rotowaro Pressure Threshold is 5 hours to 32barg

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**10:15am Inject # 2 for Producers:**

For the purpose of the exercise, you are being informed that Powerco has provided the attached simulated Media Release.

Please consider how this event would impact your operations and what your response would be in relation to Critical Contingency Management.

**11.30am Inject # 4 for TSO.**

Powerco has provided the attached Media release.

SCADA indicates:

- Maui linepack is now 240TJ
- Net Maui linepack balance is -7TJ/hour
- KGTP Pressure Threshold is 2 hours to 37.5bar.
- Rotowaro Pressure Threshold is 3 hours to 32barg

**11:30am Inject # 3 for Producers**

For the purpose of the exercise, you are being informed that Powerco has released a second simulated Media Release which is attached.

Please consider how this event would impact your operations and what your response would be in relation to Critical Contingency Management.

**12:30pm Inject # 4 for Producers:**

For the purpose of the exercise, the CCO has issued load curtailment instructions for Band 4 consumers.

Under this scenario, Regulation 54A of the CCM Regs sets out obligations on the owner of failed assets that has contributed to the critical contingency by reducing gas delivered into the gas transmission system by 5 scms or more to communicate information.

Please consider how you would comply with this requirement and advise the CCO of your proposed communication and methods. For the avoidance of doubt, you are not required to actually publish any information in the public domain related to this exercise. However, should you choose to do so to fully test your process, please ensure the communication explicitly states that it is for the purpose of an exercise only

**15:00 Inject to All Participants**

There will be no further injects for the exercise.

For this scenario which could span several days, load curtailment instructions would be subject to on-going review by the CCO and regular status updates would be provided.

Instructions to restore load would be issued as and when supply to the gas transmission system was restored. Load restoration instructions will not be issued for this exercise.

Please continue with your involvement in the exercise as required until you are advised that the exercise has ended.

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## Exercise Matatau. Simulated Communication Only



### Media Release (CCO exercise only)

8 May 2019

#### Tornado hits electricity network

##### RELEASE 1

The tornado that struck North Taranaki today has caused significant damage to Powerco's electricity network.

Network Operations Centre (NOC) manager Phil Marsh said more than 12,000 customers in New Plymouth, Waitara and Inglewood were without power including several major industries.

"We have yet to complete a full assessment of the damage but multiple numbers of poles and lines are down and road access is cut throughout the region by fallen trees and other debris. There is considerable damage to both our 33kV and 11kV networks."

He expected NOC to be in "emergency response" mode for the first 24 hours while a full damage assessment was completed.

Mr Marsh warned people to stay well clear of downed lines and call emergency services on 111 or Powerco's emergency line on ~~0800 27 27 27~~ if they have safety concerns.

"Our primary concern is to keep everyone safe."

People should consult Powerco's website at [www.powerco.co.nz](http://www.powerco.co.nz) to monitor the latest restoration information.

Powerco is New Zealand's second largest electricity utility and gas distribution utility with around 1.1m customers (across 446,000 connections) connected to its networks. Powerco's electricity networks are in Western Bay of Plenty, Thames, Coromandel, Eastern and Southern Waikato, Taranaki, Whanganui, Rangitikei, Manawatu and the Wairarapa. Its gas pipeline networks are in Taranaki, Hutt Valley, Porirua, Wellington, Horowhenua, Manawatu and Hawke's Bay.

For more information email [media@powerco.co.nz](mailto:media@powerco.co.nz) or phone ~~06 968 4557~~.

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## Exercise Matatau. Simulated Communication Only



### Media Release (CCO exercise only)

8 May 2019

#### Huge task ahead for power company

##### RELEASE 2

Powerco expects it will be more than a day before work can begin on repairing its tornado-damaged network.

An aerial survey of the path the tornado blasted through North Taranaki earlier today has revealed a level of destruction far worse than previously expected.

Network Operations Centre (NOC) manager Phil Marsh said it could be 24 hours before work would start on restoring its high voltage (33kV) network and another day and a half before we can get live supply to major gas facilities in the area.”

There were 12,000 New Plymouth, Waitara and Inglewood customers without power including several major industries.

“We are mindful of the key part some of the bigger customers play, particularly with gas supply, and we are working closely with those firms.”

Repair to the low voltage (11kV) network that is key to restoring supply residential areas would probably not be start until later in the week.

“It’s disheartening but that is the reality of the task ahead for us. Access is our main issue. Many roads are blocked by fallen trees and other debris that will take time to clear.”

People should stay well clear of downed lines and call emergency services on 111 or Powerco’s emergency line on ~~0800 27 27 27~~ if they have safety concerns.”

Powerco is New Zealand’s second largest electricity utility and gas distribution utility with around 1.1m customers (across 446,000 connections) connected to its networks. Powerco’s electricity networks are in Western Bay of Plenty, Thames, Coromandel, Eastern and Southern Waikato, Taranaki, Whanganui, Rangitikei, Manawatu and the Wairarapa. Its gas pipeline networks are in Taranaki, Hutt Valley, Porirua, Wellington, Horowhenua, Manawatu and Hawke’s Bay.

For more information email [media@powerco.co.nz](mailto:media@powerco.co.nz) or phone ~~06 968 4557~~.

## 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 Matatau</b>	<b>Date:</b>	<b>08/05/2019</b>
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Time	From	To	Details
08:57	Exercise Control	All Participants	Exercise Matatau has commenced – email & SMS Website updated to reflect exercise commenced
09:02	Exercise Control	All Participants	Current system simulated conditions issued.
09:07	Exercise Control	TSO Gas Control	Inject #1 issued. Power failure has caused loss of production at Pohokura, McKee, Mangahewa, Kowhai and Turangi Production Stations.
09:13	Gas Control	CCO	Gas Controller sends SMS to CCO requesting Duty CCO to contact Gas Control
09:15	CCO	TSO DO	CCO contacts Gas Control and is briefed on event by TSO Duty Officer. CCO requested SCADA data be switched to Event Mode and Security of Supply alert to be sent. CCO advised intention to assess system conditions while further information on situation was obtained.
09:18	Exercise Control	TSO Gas Control	Inject #2 issued. Gas Control advised of substantial damage to power lines.
09:22	TSO DO	CCO	Duty Officer contacts CCO to advise damage to power lines is substantial. TSO confirms KGTP threshold only one hour from breach. Linepack falling at 10TJ/hr. <b>CCO determines that breach of KGTP pressure threshold is unavoidable and TSO concurs.</b> <b>CCO gives urgent notice (oral) to TSO that Critical Contingency is being declared and written notice will be issued as soon as possible.</b> <b>CCO commences preparing CC Declaration Notice.</b>
09:26	Exercise Control	Electricity System Operator	Inject issued advising of power outage affecting 33KV and 11KV network at Hurangi GXP
09:27	TSO DO	CCO	TSO Duty Officer called to advise that SOS Alert is about to be sent and next update would be at 10:00.
09:28	Exercise Control	Producers	Inject #1 issued advising loss of power and production at Pohokura, McKee, Mangahewa, Kowhai and Turangi Production Stations.

Time	From	To	Details
09:30	TSO	CCO	Security of Supply Update #1 issued.
09:31	CCO	Methanex Nominations	CCO advised loss of production. Confirmed Mx still flowing. Requested current plant status. Confirmed in process of declaring CC and consider curtailment requirements.
09:39	TSO DO	CCO	TSO Duty Officer called CCO to advise that they are close to completing preparation of their own Declaration Notice. CCO advised that CCO Notice is nearly completed and about to be sent.
09:41	CCO	Huntly Power Station	CCO advised loss of production and requested plant status. #5 running. 281GJ of gas being used in one Rankine. 2 <sup>nd</sup> Rankine on coal.
09:44	CCO	Electricity System Operator	CCO confirmed in process of declaring CC and considering curtailment requirements. Is Huntly required? Confirmed not.
<b>09:45</b>	<b>CCO</b>	<b>TSO &amp; Stakeholder</b>	<b>Critical Contingency Declaration notice CC-0050 emailed to TSO &amp; Stakeholders.</b>
09:48	CCO		Declaration notice CC-0050 published on website.
09:50	CCO		SMS text advising CC-0050 has been issued.
09:52	TSO	Interconnected Parties	OATIS (Maui) New Critical notice ID 49993 "Exercise Matatau – Critical Contingency Declaration Notice CC-0050" - Action Required
09:54	TSO	Interconnected Parties	OATIS (Vector) New Critical notice ID 49994 "Exercise Matatau – Critical Contingency Declaration Notice CC-0050" - Action Required
09:55	CCO	Ballance	Left message highlighting CC event and need to curtail using agreed shutdown profile
09:57	CCO	NZRC	Confirmed they were aware of the CC event and need to curtail
09:58	Exercise Control	TSO	Inject #3 issued with simulated Powerco media release. Power outage at least 24 hours.
10:00	Greymouth Petroleum	CCO	GPL confirmed that Kowhai and Turangi have back-up generators and would be able to recommence operations. CCO acknowledges.
10:01	Exercise Control	Producers	Inject #3 issued with simulated Powerco media release. Power outage at least 24 hours.
10:03	CCO	GIC	Ensured GIC were aware of CC event and situation to date
10:06	TSO	CCO	Update meeting between CCO and TSO – Line Pack at 249 TJ, 3.5 hours to KGTP threshold, losing 10TJ per hour and Powerco confirm report of tornado through Tikorangi substation. Scheduler advised CCO that Contact had called to advise that they could provide additional gas from Ahuroa – this was assumed to mean they would use this gas to supply TCC and thereby reduce their offtake from the system by about 1.5 TJ/hour.
10.08	Ballance	CCO	Ballance provide alternate contact information. CCO phoned new contact to highlight need to curtail using shutdown profile. The

Time	From	To	Details
			allowance of the shutdown profile could change, they should monitor notices.
10:05	TSO	CCO	SoS Alert #2 issued.
10:10	CCO	OMV	CCO requested confirmation that loss of power would mean loss of production until power was restored. Confirmed by OMV.
10:18	CCO	Todd Energy	CCO requested confirmation that loss of power would mean loss of production until power was restored. Todd to check and advise.
10:26	CCO	Kupe	CCO calling nominated contact to explore opportunities for increased production. No reply.
10:30	CCO	Kapuni	CCO calling nominated contact to explore opportunities for increased production. Production could increase by around 0.5TJ/hr.
<b>10:31</b>	<b>CCO</b>	<b>TSO &amp; Stakeholders</b>	<b>Demand Curtailment notice CC-0051 emailed to TSO &amp; copied to Stakeholders.</b>
10:32	CCO		Curtailment notice CC-0051 published on website.
10:33	CCO	Stakeholders	SMS text advising CC-0051 has been issued.
10:35	TSO DO	CCO	TSO Duty Officer called CCO to confirm receipt of notice ...
10:41	TSO	Interconnected Parties	OATIS (Maui) New Critical notice ID 49995 "Exercise Matatau" – Direction to Curtail Demand Notice CC-0051" - Action Required
10:42	CCO	Methanex	Methanex confirmed their shutdown would mean zero flow at Ngatimaru Rd (Receipt) by 2pm and Faull Rd by 3pm. Bertrand Rd was not using gas in this scenario.
10:43	CCO	Kupe	CCO calling nominated contact to explore opportunities for increased production. No reply.
10:47	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 43157 "Exercise Matatau - Direction to Curtail Demand Notice - CC-0051" - Action Required
11:06	Exercise Control	TSO	Inject #4 issued with simulated Powerco media statement advising repairs will take 60 hours.
11:07	Exercise Control	Producers	Inject #3 issued with simulated Powerco media statement advising repairs will take 60 hours.
11:16	TSO	CCO	SoS Alert #3 issued.
<b>11:30</b>	<b>CCO</b>	<b>TSO &amp; Stakeholders</b>	<b>Revised Demand Curtailment notice CC-0052 emailed to TSO &amp; copied to Stakeholders.</b> (Error in curtailment instructions. Band 3CP should be curtailed fully.)
11:30	CCO		Revised Demand Curtailment notice CC-0052 published on CCO website
11:31	CCO	Stakeholders	SMS text advising Revised Demand Curtailment CC-0052 has been issued.

Time	From	To	Details
11:37	Critical Compliance	CCO	First curtailment compliance update provided.
11:41	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 49997 "Exercise Matatau - Direction to Revise Demand Curtailment Notice - CC-0052" - Action Required
11:44	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 49998 "Exercise Matatau - Direction to Revise Demand Curtailment Notice CC-0052" - Action Required
11:44	Exercise Control	Producers	Inject #4 issued advising of asset owner obligations under Regulation 54A
11:47	CCO	Methanex	Follow up call regarding need to curtail fully. Requirement understood. Initial thoughts that it would take around an hour.
11:59	OMV	CCO	OMV mock communication provided. CCO asked where the communication would be posted.
12:15	Nova	CCO	Advised curtailment information but incorrect template used and sent to wrong place. CCO provided correct template and advised correct recipient.
12:23	Genesis	Retailers	Established communications role as "Lead Retailer" should event escalate to needing media appeals.
12:24	Todd	CCO	Confirmed impact of power loss on production capability.
12:33	Critical Compliance	CCO	Second curtailment compliance update provided.
<b>12:51</b>	<b>CCO</b>	<b>Stakeholders</b>	<b>Status Update notice CC-0053 emailed to Stakeholders &amp; copied to TSO.</b> (Notice number CC-0054 used on notice and incorrect date in error.)
12:51	CCO		Status Update notice CC-0048 published on CCO website
12:51	CCO	Stakeholders	SMS text advising Status Update CC-0053 has been issued.
13:01	TSO	CCO	TSO called CCO to advise an error in notice CC-0053
<b>13:08</b>	<b>CCO</b>	<b>Stakeholders</b>	<b>Corrected Status Update notice CC-0053 emailed to Stakeholders &amp; copied to TSO.</b>
<b>13:10</b>	TSO	CCO	TSO called CCO to advise corrected notice received ...
13:16	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 5002 "Exercise Matatau - Critical Contingency Status Update Notice - CC-0053" - Action Required
13:19	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID 5003 "Exercise Matatau - Critical Contingency Status Update Notice - CC-0053" - Action Required
13:33	Critical Compliance	CCO	Third curtailment compliance update provided.

<b>Time</b>	<b>From</b>	<b>To</b>	<b>Details</b>
13:34	OMV	CCO	OMV confirmed that a back-up generator would not be used and advised where communications would be posted.
14:07	CCO	OMV	Further information on GIC determination on what publishing information means.
14:15	CCO	Todd	Further information on GIC determination on what publishing information means.
14:16	Exercise Control	All Participants	Email to all participants to advise that no further injects will be issued and load restoration notices will not be issued for the exercise.
14:35	Critical Compliance	CCO	Fourth curtailment compliance update provided.
15:12	Exercise Control	All Participants	Advised that exercise has ended
15:15	CCO		Website updated to reflect Exercise Matatau has ended.
15:17	TSO	Interconnected Parties	OATIS (Maui). New Critical notice ID 50007 "Exercise Matatau - Exercise Termination." - Action Required
15:19	Exercise Control	Retailers	Requested feedback on testing on Retailer Curtailment Plans and provided optional template
15:21	Exercise Control	Stakeholders	SMS text advising that Exercise Matatau has ended.
15:22	TSO	Interconnected Parties	OATIS (Vector). New Critical notice ID50008 "Exercise Matatau - Exercise Termination." - Action Required
15:32	Critical Compliance	CCO	Final curtailment compliance update provided.

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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 08/05/19

### Notices to TSO

Time CCO e-mailed Notice to TSO	Notice ID	Notice Type	Time TSO Published CCO Notice	
			OATIS (Maui)	OATIS (First Gas)
09:45	CC-0050	Critical Contingency Declaration	09:52	09:54
10:31	CC-0051	Direction to Curtail Demand	10:41	10:42
11:30	CC-0052	Revised Demand Curtailment	11:41	11:44
13:08	CC-0053	Status Update	13:16	13:19

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

## Appendix D – 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?	