



CCO ANNUAL INDUSTRY EXERCISE

PARTICIPANTS' BRIEF: "EXERCISE AITUĀ"

Wednesday 13 May 2026

Critical Contingency Operator test of the
Firstgas Critical Contingency Management Plan
and Retailer emergency contacts.

Prepared for exercise participants
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1. Introduction

Every year, the Critical Contingency Operator (CCO) must run an exercise under Gas Governance (Critical Contingency Management) Regulations 2008 to make sure the gas industry is ready to respond to a major gas supply problem.

This exercise checks that:

- the Firstgas 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 Retailers' list of emergency contact details required by regulation 43 is current

Exercises help everyone practise their roles, test communication channels, and identify improvements.

A formal report must be sent to the Gas Industry Company within 20 business days after the exercise.

2. Exercise Structure

- The exercise will take place on Wednesday **13 May 2026** from **9am to 4pm**.
- A simulated fault on the gas transmission system will be used to test how well all parties respond.
- The CCO will audit some aspects of the Firstgas CCMP before the exercise day (as per Appendix A).

Important:

- This is a **desk-top exercise only**.
- No physical equipment will be operated, and no real gas supply changes will occur.
- All communications will be treated *as if* the event were real.

3. Exercise Management

- The CCO creates the scenario and controls the exercise.
- The scenario is not provided in advance, so the response is realistic.
- Firstgas will follow their standard emergency response procedures.
- The exercise may run faster than real life to fit within the day.
- The CCO will issue a set of planned "injects" (events or information) to drive the exercise.

3.1. Exercise Rules

- The CCO will issue email communications to confirm the start and end of the exercise.
- No real operational changes are allowed (no system adjustments, alarms, or field staff mobilisation).
- All written communications must begin with “**Exercise Aituā**”.
- All phone calls must start and end with “**Exercise Aituā**”.

If a real emergency happens:

- The exercise will stop immediately.
- The CCO will send a “**No Duff**” message to signal that the event is real.

4. Retailer Participation

Timely and effective curtailment is at the heart of critical contingency management so Retailers must test their consumer emergency contact details.

The number of consumers affected by any scenario will vary from Retailer to Retailer and testing of all contact details on the day of an exercise has proven problematic for some Retailers in previous test exercises. The CCO recommends the following two-stage approach that would satisfy the exercise test criteria:

1. Prior to the exercise:

- Review the Retailer Curtailment Plan to ensure it meets the requirements of regulation 43.
- Contact a sample of consumers across the different bands to confirm their details. The sample should be commensurate to the Retailers total number of consumers, but the CCO recommends at least:
 - All Band 3 consumers
 - 20% of Band 4 consumers
 - All Band 5 consumers
 - 10% Band 6 consumers
 - All Band 7 consumers
- Keep a record of how many consumers you contacted and how many updates you had to make.

2. On the exercise day:

- Prepare a list of consumers affected by the scenario.
- Prepare the message that would be sent to them.
- Estimate how long it would take to notify all consumers in each consumption band.
- Provide curtailment compliance updates to Firstgas using the template.
- Prepare a media appeal for domestic consumers if asked by the CCO.

Retailers must send their completed Curtailment Plan Test Report (Appendix F) to the CCO **by Friday 22 May 2026**.

5. Large Consumers

Large consumers should:

- Watch for communications from Firstgas and the CCO during the exercise.
- If affected by the scenario, practise sending curtailment updates to Firstgas.
- If not affected, use the opportunity to review their own emergency plans.

6. Asset Owners

If the exercise scenario involves a failure of an asset (such as a pipeline or station), the asset owner must practise providing the required information, as per regulation 54A and Schedule 5.

7. Other Participants

All other industry participants are encouraged to:

- Follow the exercise communications.
- Think about how their organisation would respond in a real event.
- Use this exercise to review their own readiness and plans.

8. Participants' Notes and Debriefing

Everyone is encouraged to take notes during the exercise, including:

- Observations
- Issues
- Suggestions for improvement

Debriefs will be held by the CCO and Firstgas, and other participants are encouraged to hold their own and share any relevant findings.

Feedback should be sent to the CCO within 10 business days of the exercise.

Appendix A – Pre-Exercise Audit of Firstgas (TSO) by CCO

The CCO will arrange to carry this out with the Firstgas prior to the exercise.

Test Objective	Reg.	Description
The CCMP provides for compliant thresholds that meet the purpose of the regulations.	r25(1)(a)	<p>Check the stated rationale for each threshold and that the rationale is still representative, and any system changes have been considered.</p> <p>Check that the SCADA system has appropriate alarms set.</p> <p>Check that the threshold information is reaching the CCO in an effective/timely fashion.</p>
The CCMP contains description of the events that the TSO considers may feasibly result in a breach of the thresholds.	r25(1)(b)	Check these are complete, valid and up to date with learnings from previous exercises/events or recent system changes reflected.
The CCMP contains actions that the TSO may take to remedy any threshold breach	r25(1)(c)	Check these are complete, valid and up to date with learnings from previous exercises/events or recent system changes reflected. These should deal with the events described re (b) above.
<p>The contact details in the CCMP are current:</p> <ul style="list-style-type: none"> • Gas storage operators • Gas production operators • Large consumers directly connected • Interconnected parties; retailers and shippers • Gas distributors 	r25(1)(i)	Are these being regularly updated and entered in OATIS accurately?

Appendix B – Firstgas (TSO) Exercise Objectives

Firstgas should report against these objectives specifically in their post exercise report.

Test Objective	Reg.	Description
The CCMP has a communications plan describing how the TSO will communicate to and from the participants and within what timeframes.	r25(1)(e)	Monitor the communications and check for clarity and timeliness
The CCMP contains the contact details of suitably qualified TSO employees responsible for giving communications and directions under the CCMP and communications plan.	r25(1)(f)	Monitor how roles are allocated within the exercise and how communications and directions are given
The CCMP provides effective mechanisms for making information available to the CCO.	r25(1)(j) r38 Comms Protocol	A detailed check needs to be made against each item of r38 and note made of the ease, accuracy and timeliness of the information that is reaching the CCO.
The protocol for informing the CCO of potential CC conditions.	r25(1)(j) r38(1A)(a)(i)	CCO to be alerted within 15 minutes
The CCMP has a process for demand curtailment and restoration consistent with the purpose of the regulations.	r25(1)(d)	Observe the processes during the exercise and note their effectiveness
The CCMP details circumstances in which the TSO may consider restoration should be directed in an order different from the regulations.	r25(1)(g)	Observe the consideration given by the TSO to restoration
The CCMP has a process to determine the contingency imbalances.	r25(1)(h)	Are these processes up to date and have they been verified recently?

Appendix C – Retailers’ Exercise Objectives

Test Objective	Reg.	Description
Ensure the Retailer has up to date curtailment band information for each consumer.	r43	Retailer to check this prior to the exercise day.
Ensure the Retailer Curtailment Plan contains 24/7 contact information for each consumer installation.	r43	Retailer to test a sample of consumers commensurate with their total number of consumers.
Confirm each Retailer has a process for keeping contact and curtailment band information up to date.	r43	Retailer to describe their process in the post-exercise report to the CCO (Appendix F)
Retailers provide regular curtailment updates to Firstgas.	r55	Provide at least one curtailment compliance update to Firstgas which would reflect the anticipated curtailment position at the time specified on the CCO curtailment notice.
Retailers to give urgent notice to their consumers affected by a CC direction.	r56	Retailers to ensure their process would be able to be effectively applied on the exercise day.
Ensure Retailer has a process for implementing a media appeal to domestic consumers to conserve the use of gas.	r43	Observe the process and note the effectiveness. Retailer to describe their process in the post-exercise report to the CCO (Appendix F)

Appendix D – Large Consumers

Test Objective	Reg.	Description
Communications from Firstgas to large consumers are effective.	r54/55	Observe the process and note the effectiveness
Large consumers provide regular curtailment updates to Firstgas.	r55	Observe the frequency and quality of updates to the Firstgas during the exercise.
Ensure designations are understood	R46 R53 (da) and schedule 3	Ensure the organisation understands its designations (if any) and the correct response for different possible event scenarios.

Appendix E – Asset Owners’ Exercise Objectives

Test Objective	Reg.	Description
The owner of the damaged or failed component publishes the required information.	r54A Schedule 5 (2)	If Band 3 is curtailed, asset owner publishes information required by Schedule 5 (2)

Appendix F– Retailer Curtailment Plan Testing Report

Retailers should use this report template to report their findings to the CCO.

Retailer Name					
1. Description of the process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.					
2. Description of process in place for implementing any media appeals if directed by the CCO under regulation 53(1)(db).					
Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
4. How many consumers do you have in each curtailment band?					
5. Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?					
6. For the consumers contacted to verify contact details, what percentage were incorrect?					
6. If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?					
8. Comment on the effectiveness of the implementation of your Retailer Curtailment Plan for the exercise.					
9. What are the 'actions arising' for your organisation from this exercise?					
10. Any other comments?					