

# CRITICAL CONTINGENCY OPERATOR



## ANNUAL INDUSTRY EXERCISE 2026

### “Exercise Aitua”

Test of the First Gas Ltd Critical Contingency Management Plan

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

June 2026

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Redefining Clever.

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## **Acknowledgment**

The success of this exercise was largely due to the time and effort invested by participants throughout the planning, execution, and feedback phases. Their contributions are both recognised and appreciated, and they have been instrumental in identifying valuable opportunities for improvement.

## 1. Introduction

The purpose of the Gas Governance (Critical Contingency Management) Regulations 2008 (the regulations) is to achieve the effective management of critical gas outages and other security of supply contingencies without compromising long-term security of supply.

The Critical Contingency Operator (CCO) is required, under regulation 34 to conduct exercises to test that:

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

Following the exercise, regulation 34 also requires that:

- a) within 10 business days of the exercise, Firstgas as the Transmission System Owner (TSO) must provide a report to the CCO that:
  - a. Explains how the Firstgas CCMP meets or does not meet the test criteria in section 34(1) of the regulations.
  - b. Identifies areas in which the Firstgas CCMP can be improved.
  - c. Recommends any amendments Firstgas considers should be made to the CCMP.
  - d. Provides any other information that Firstgas considers appropriate.
- a) within 10 business days of receiving the TSO report, the CCO must provide a report to the industry body that:
  - assesses the effectiveness of the CCMP; and
  - evaluates any amendments to the CCMP recommended by the TSO; and
  - identifies any amendments to the regulations, CCMP, Communications Plan or Information Guide that would improve their effectiveness in achieving the purpose of the regulations.

A test exercise, "**Exercise Aitua**" was carried out on 13 May 2026. The exercise required the CCO, TSO (Firstgas) and Retailers to carry out tasks and activities aligned with the regulations, CCMP and other relevant documents.

The inputs for this report on **Exercise Aitua** include:

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

## 2. Executive Summary

Exercise Aitua provided an opportunity for parties to practice their response to a critical contingency event and enhance their knowledge and competency in managing a real event. The exercise was completed successfully and tested key critical contingency phases and information flows including declaration, demand curtailment, media appeal and public information statements.

This year's scenario simulated a 'regional' event. Retailers were issued with curtailment instructions and required to provide curtailment compliance updates. They were also required to issue a media appeal requesting domestic consumers in the affected area to reduce gas usage. Gas producers and large consumers were not impacted by the scenario.

The CCO concludes that Firstgas and Retailers have established applicable processes and procedures for responding to critical contingency events in accordance with the regulations. The annual exercise provides a valuable opportunity to test, review, and practice processes and procedures, while also identifying areas for improvement.

Firstgas demonstrated a marked improvement in urgency and responsiveness at the start of the exercise, as shown by its prompt receipt of and response to the initial inject and associated notifications. This suggests that their internal training undertaken during the year had a positive effect. However, the period between declaration and curtailment highlighted areas where the application of existing processes did not align with required timeframes. In a fast-moving event, the ability to move quickly from declaration to curtailment will be critical to achieving the purpose of the regulations.

Effective security of supply depends on accurately determining the level of curtailment required without overreaching. Once curtailment levels have been notified, the process is reliant on Retailers to effectively communicate with consumers in the timeframes allowed for in the critical contingency thresholds. The exercise identified a need for process improvement to ensure all Retailers apply the processes correctly and within set timeframes.

Overall, the exercise demonstrated the CCMP, CCO procedures, and Retailers Curtailment Plans met the purpose of the regulations in achieving the effective management of critical gas outages.

With respect to regulation 34, the CCO's conclusions from this exercise are shown below:

Test Exercise Criteria	CCO's Conclusion	Qualifying Comments
Does the CCMP comply with regulation 25 and is it effective in achieving the purpose of the regulations?	Yes, the CCMP is compliant	The CCMP has only recently been revised and confirmed as compliant and Firstgas acted in accordance with the CCMP during the exercise.  The exercise identified several recommendations that would improve the response to an actual event, but none require changes to the CCMP.
Does the CCMP contain the contact details required by	Yes	New organisations have been listed in the recently revised CCMP and the CCO has confirmed that at least one contact from each organisation is contained in OATIS contacts.

Test Exercise Criteria	CCO's Conclusion	Qualifying Comments
regulation 25 and are they current?		
Is the list of emergency contact details maintained by Retailers in accordance with regulation 43 current?	Yes	<p>Feedback from Retailers provides assurance that appropriate processes and systems are in place for managing consumer contact details.</p> <p>Note: the CCO cannot verify this directly.</p>

In addition, section 5 of this report provides recommendations which would enhance the efficiency of the processes and procedures that support the current framework.

It should be noted that a proposal to amend the regulations is currently with Parliamentary Counsel Office for drafting. Any resulting changes to the regulations will trigger the need to update the CCMP, Communications Plan and Information Guide.

**3. Exercise Implementation**

A Participants Brief was issued to all exercise participants on 25 February 2026. It outlined the structure and management of the exercise, the required level of participation, and the test objectives.

The exercise was conducted as a desk-top simulation. While formal notices were issued and published, and communications were made to industry participants, no physical actions affecting equipment or gas supplies were undertaken.

**4. Exercise Scenario**

The exercise scenario was designed and managed by the CCO and simulated third-party damage to the 300mm Firstgas Bay of Plenty Pipeline at Arapuni Road near Parawera in the Waikato. The damage, caused by an excavator, resulted in a large gas leak and the closure of main line valves at Parawera Road and Arapuni West, isolating the downstream gas supply.

At 9:04am, the TSO Control Room advised the CCO that that there had been damage to the Firstgas Bay of Plenty Pipeline in the Waikato near Arapuni resulting in a significant gas escape and the pipeline needed to be isolated, prompting the CCO to determine that a critical contingency had occurred. The event resulted in a breach of the critical contingency threshold at Tauranga.

A regional critical contingency was declared, affecting all gas gates and consumers downstream of Arapuni on the Bay of Plenty pipeline (Rotorua, Taupo, the Bay of Plenty and Gisborne). The CCO initiated a curtailment down to Band 4, followed by a further curtailment down to band 6 once the repair time had been estimated. Consumers in Bands 0 to 2 were not affected, as there were none in the affected area.

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

To ensure that the full range of test objectives were addressed, a series of pre-designed exercise injects were issued at scheduled intervals. Full details of the injects are provided in Appendix A.

## 5. Recommendations

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

#	Section	Recommendation	Responsible
1	6.1	<i>Update Appendix 1 Firstgas Document, 09456 Critical Contingency Pipeline Thresholds Overview to align with the current approved CCMP.</i>	Firstgas
2	6.1	<i>Provide the CCO with real-time access to pressure threshold information by the end of July 2026.</i>	Firstgas
3	6.1	<i>Ensure all Control Room Operators are familiar with the requirements of Regulation 38(1A).</i>	Firstgas
4	6.3	<i>Review OATIS notice processes to ensure the CCO notice is accurately presented.</i>	Firstgas
5	6.7	<i>Firstgas consider giving the CC liaison role visibility of SCADA to ensure awareness of system survival and to inform conversations with the CCO</i>	Firstgas
6	6.9	<i>Consider options such as conducting targeted training and scenario-based exercises to validate understanding and consistent application of the Control Room – CC Liaison - CCO communication pathway, including escalation triggers, update frequency, and responsibilities</i>	Firstgas
7	6.9	<i>Consider ways to reinforce and test Security of Supply communication requirements e.g. through targeted training and future exercises, with specific focus on timely escalation of new information and written confirmation within the required timeframes</i>	Firstgas
8	6.9	<i>Explore options to strengthen information sharing between the TSO &amp; CCO, including the provision of consistent quantitative system conditions and modelling data from both parties, to better underpin curtailment recommendations</i>	Firstgas/CCO
9	6.9	<i>For future exercises it could be beneficial for Exercise Control to provide or “front-load” supporting operational information relevant to the exercise scenario.</i>	Firstgas/CCO

#	Section	Recommendation	Responsible
10	6.9	<p><i>Continue to work with Retailers and Large Consumers to ensure that they understand curtailment compliance processes and expectations.</i></p> <p><i>Continuing difference between registry numbers of ICPs and Retailer provided number of ICP's to be explored.</i></p>	Firstgas/GIC
11	6.9	<p><i>Consider the options available to review the accuracy of Retailer communications to help ensure efficient and effective outcomes during a critical contingency event.</i></p>	Firstgas/CCO/GIC
12	7.1	<p><i>Firstgas to review how the Security of Supply can include an exercise title when appropriate.</i></p>	Firstgas
13	8.3	<p><i>CCO to add contact details for Ballance to the Retailer sub-group within the CCO contact database.</i></p>	CCO
14	8.4	<p><i>Retailers keep their processes for contacting consumers affected by a critical contingency under regular review to find opportunities for continuous improvement to ensure that all consumers could be contacted within the time allowed under the critical contingency pressure thresholds.</i></p>	Retailers
15	8.6	<p><i>Nova and the lead Retailer should confirm whether Nova will join the Retailer media appeal protocol or continue issuing its own media appeal.</i></p>	Nova/lead Retailer

## 6. Assessment of Firstgas (TSO) Performance Against Exercise Objectives

### 6.1. Pre-Exercise Audit of Firstgas by CCO

The pre-exercise elements were audited on the 7 May 2026, 6 days prior to the actual exercise date. All items were audited with the Senior Commercial Advisor Transmission, Lead Transmission Scheduler and Manager, Integrated Control Room.

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

##### **Thresholds**

The Firstgas document 09456 – Critical Contingency Pipeline Thresholds Overview outlines the rationale for setting the critical contingency pressure thresholds required under the regulations.

The document was updated in April 2026 to reflect the removal of the Taupo DP and Broadlands DP pressure thresholds, which occurred in March 2024 following GIC’s approval of amendments to Schedule 1 of the regulations.

Appendix 5 references a proposal to reduce the Pmin component of two pressure thresholds— Waitangirua and Cambridge. The proposed changes are:

- **Waitangirua:** Critical contingency threshold adjusted to 10 hours to 33 barg (previously 37 barg)
- **Cambridge:** Critical contingency threshold adjusted to 5 hours to 27.5 barg (previously 30 barg)

These proposals fall within the permissible threshold limits of the current regulations. The revised thresholds were incorporated into the updated CCMP approved by GIC on 20 April 2026.

Appendix 1 of the document has not yet been updated to reflect the revised pressure thresholds included in the approved CCMP dated 20 April 2026.

##### ***Recommendation:***

- *Update Appendix 1 Firstgas Document, 09456 Critical Contingency Pipeline Thresholds Overview to align with the current approved CCMP.*

##### **Threshold information to CCO**

The CCO receives pressure threshold information through the SCADA Data Transfer process, which provides hourly and 5-minute data files. By the time these files reach the CCO, the threshold information is approximately 90 minutes old for hourly data and 10 minutes old for 5-minute data.

The CCO has confirmed that the threshold information is being received reliably. It has also been verified that the data sent to the CCO uses the same SCADA reference as that viewed by Firstgas, based on comparisons between the CCO model and the Control Room display.

A new Firstgas SCADA system—designed to provide the CCO with real-time access to pressure thresholds—has now been installed and commissioned. Firstgas has advised that the CCO should have access to real-time data by the end of July 2026, which will eliminate the current delays in receiving threshold information.

**Recommendation:**

- *Provide the CCO with real-time access to pressure threshold information by the end of July 2026.*

**Scada System Alarms**

The critical contingency threshold alarm settings were checked on the SCADA system in the Control Room.

The alarms that indicate the threshold point has been reached are identified as “Low Low” alarms (formerly known as Critical Alarms). These were observed to be set correctly in accordance with the minimum pressures and times specified in the April 2026 CCMP.

The Control Room also sets alarms to indicate when conditions are approaching the threshold point. These are identified as “Low” alarms. At the time of inspection, these alarms were set to trigger 1 barg above the minimum pressure and 1 hour before the threshold time.

Historically, the Low alarms have been set to 2 hours before the threshold time and minimum pressure.

Firstgas advised that the Low alarms would be adjusted to trigger 2 hours before the threshold levels specified in the CCMP.

The revised alarm settings were re-checked on the day of the annual exercise and were confirmed to be correct.

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

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

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

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

It states that emergency response capability is tested and evaluated through regular trial or training exercises.

Firstgas schedules monthly emergency response exercises and involves the CCO where relevant. The most recent exercise was held on 23 April. The scenario involved falling pressure at several Delivery Points, with the cause initially unknown. The FGL Control Room elected not to notify the CCO of this event.

The CCO considers that the scenario met the threshold under regulation 381A, which requires the TSO to “alert the CCO within 15 minutes of any event within the transmission system that has the potential to create a critical contingency.”

**Recommendation:**

- *Ensure all Control Room Operators are familiar with the requirements of regulation 38(1A).*

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

The contacts are listed in Appendix 4 of the CCMP. Section 3.2.3 of the Firstgas CCMP states that:

*Stakeholder contact details are stored in OATIS by party and contact group. Regular OATIS users (e.g. Shippers, Interconnected Parties) have separate contact groups from occasional users (e.g. some Retailers and distributors). Firstgas uses these OATIS groups to send SMS and email alerts as required. OATIS users must keep their contact details current. Monthly email reminders are sent by Firstgas to confirm or update details. For non-OATIS users, Firstgas checks and updates contact details every six months or as needed.*

Approximately three weeks prior to the test exercise, Firstgas carried out one of the biannual OATIS contact audits referred to above.

This process involves downloading all stakeholder contact details held in OATIS and sending them to each stakeholder or company for review and update as required.

Firstgas confirmed that at least one contact for each relevant organisation is currently recorded in OATIS. They also provided the CCO with an example of the OATIS contact audit email and the attachments sent to stakeholders.

Firstgas supplied the CCO with a copy of the latest OATIS contact reports, which can be generated daily. The CCO reviewed these reports and observed that contact details are held for all parties listed in Appendix 4 of the CCMP.

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

Section 5 and Appendices 1 to 3 of the CCMP details the demand curtailment and restoration processes. In this exercise, the CCO elected to not test the demand restoration processes due to the nature of the scenario.

**Observation:**

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

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

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

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

- on OATIS as a ‘public’ notice.
- within 30-minutes of receiving them from the CCO.
- with an accompanying email and SMS notification to those stakeholders set-up to receive such notifications in OATIS.

During the early stages of Exercise Aitua, Firstgas representatives were notified by a Retailer that they were not receiving Firstgas OATIS SMS or email notifications and could not view TSO notices that had been published on OATIS. Subsequent investigations by the Retailer established that there was an IT-related issue at their end preventing the receipt of SMS and email notifications as well as the visibility of OATIS notices. This issue was remedied by the Retailer during the exercise.

**Observations:**

- *In this exercise, all notices issued by Firstgas met the criteria outlined in the CCMP.*
- *The Firstgas OATIS notices communicating CC-095 incorrectly included reference to “Regional Status Update” in the title, which was not relevant to the notice.*
- *OATIS notices didn’t show the “exercise only” watermark on the posted notices.*

**Recommendation:**

- *Review OATIS notice processes to ensure the CCO notice is accurately presented.*

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

Appendix 5 of the Firstgas 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 details were used for electronic communication between Firstgas and the CCO during the exercise. Note that Appendix 5 references the “Clarus Duty Manager”, which is a Clarus-wide role and not specific to Firstgas or the gas transmission system.

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

Section 5.6 and Appendix 10 of the CCMP details the steps taken for considering alternate restoration arrangements.

**Observation:**

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

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

Appendix 7 of the Firstgas CCMP contains detailed 12-step and 22-step processes for contingency imbalance calculation methodologies consistent with MPOC and GTC respectively. This section also describes how Firstgas will properly integrate the contingency imbalance regime prescribed in the regulations with Firstgas' business-as-usual regime under Section 8 of the Gas Transmission Code (GTC).

**Observation:**

- *Critical contingency imbalances would not have been required to be calculated in the test exercise circumstances because of the classification of the event as "regional".*

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

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

Detailed communication was also managed through the Communication Protocol. The Communications Protocol is not formally recognised or referenced in the regulations. However, it was jointly developed by Firstgas and the CCO to support the Communications Plan by detailing processes that promote efficient information and communication flows between the CCO and Firstgas, in accordance with the requirements set out in regulations 38 and 38A. A summary of the Communications Protocol is provided in Appendix 11 of the CCO's Communications Plan.

**Observations:**

- *Information flows and communication between the Firstgas Control Room, CC Liaison role (once appointed) and the CCO were not always timely or effective during the exercise. For example the review and publication of the initial direction to curtail could have occurred more expeditiously.*
- *Exercise Aitua was the second critical contingency exercise where the SharePoint-based "Security of Supply" (SoS) Update templates were used by the Firstgas Control Room. The new templates were helpful and assisted with the exchange of information between the TSO and CCO. However, one SoS update was not communicated to the CCO within the required timeframe following receipt of new information.*
- *The CC liaison role didn't have visibility of SCADA to inform the dialogue with the CCO. This isn't highlighted in an exercise scenario where the scenario isn't reflected in the SCADA system, but during a real event visibility of SCADA would ensure system survival was front and centre.*

**Recommendation:**

- *Firstgas consider giving the CC liaison role visibility of SCADA to ensure awareness of system survival and to inform conversations with the CCO.*

It is noted the TSO has made additional recommendations to address the information flow and SoS observations, which are included in section 6.9.

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

Section 2 of the Firstgas CCMP addresses pre-critical contingency conditions and sets out the conditions under which Firstgas will notify the CCO of any event it believes could or would result in a critical contingency scenario. It also states that Firstgas will communicate with the CCO in accordance with the CCO Communications Plan. Exercise Aitua was carried out in a manner consistent with the Firstgas CCMP and the CCO Communications Plan, although a Potential CC was not included in this exercise.

The Communication Protocol between Firstgas and the CCO sets out the supplementary information to be provided to the CCO that is considered necessary to ensure that the CCO has the information required to assess, declare, and appropriately manage the event. Firstgas considers that the information flows and associated timeframes set out in the relevant sections of the Communications Protocol were adhered to during the test exercise for aspects incorporated in the exercise.

**Observation:**

- *In previous test exercises, the initial interactions and communications during a potential emergency and/or critical contingency event (i.e. the first ~30 minutes) could have benefited from a greater sense of urgency from TSO representatives. Consequently, TSO representatives have held monthly exercises (some including CCO personnel) to test these specific exchanges leading up to a declaration of a critical contingency. As a result the initial interactions and communications by TSO representatives with the CCO had improved.*
- *Firstgas met the regulatory requirement to alert the CCO within 15 minutes of an event within the transmission system that had the potential, or did create a critical contingency.*

6.9. **Firstgas Exercise Report Summary**

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

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

Firstgas submitted the report to the CCO on 27 May 2026. In summary, the Firstgas report:

- concluded that the Firstgas CCMP complies with regulation 25 and when implemented during the test exercise gave effect to the purpose of the regulations.
- identified seven (7) actions to improve the efficiency of processes and procedures to support application of the CCMP.
- did not recommend any amendments to the CCMP

The seven actions identified by Firstgas are summarised below and have been included in the recommendations in section 5 above.

Ref	Regulation	Observation	Recommendation / Response	Action By
1.	r25(1)(a)	The CCO's pre-exercise audit noted that Appendix 1 of TSO procedure document 09456 (Critical Contingency Pipeline Thresholds Overview and Background) should be updated to reflect the two pressure threshold changes recently approved in the current Firstgas CCMP (April 2026)	The latest review and update of 09456 occurred prior to the formal approval of the revised pressure thresholds in the CCMP. Firstgas will make changes to Appendix 1 of document 09456 to ensure it aligns with the pressure thresholds in the CCMP.	TSO
2.	r25(1)(e), r38	Information flow between the Control Room, CC Liaison (CCL), and CCO was not consistently effective, resulting in delays and gaps in information reaching the CCO.	Conduct targeted training and scenario-based exercises to validate understanding and consistent application of the CRO-CCL-CCO communication pathway, including escalation triggers, update frequency, and responsibilities.	TSO
3.	r25(1)(e), r25(1)(j), r38	Security of Supply (SoS) updates were not consistently communicated to the CCO within the required timeframe following receipt of new information. Whilst the initial SoS was issued promptly, the subsequent SoS (#2) was issued 40 minutes after the relevant update was received.	Reinforce and test SoS communication requirements through targeted training and future exercises, with specific focus on timely escalation of new information and written confirmation within the required timeframes.	TSO
4.	r25(1)(j), r38	TSO requests for increased curtailment were not supported by sufficient quantitative data to inform CCO decision making.	Explore options to strengthen information sharing between the TSO & CCO, including the provision of consistent quantitative system conditions and modelling data from both parties, to better underpin curtailment recommendations.	TSO / CCO
5.	r25(1)(j), r38	During the exercise, the CCO requested an estimated system survival time update	For future exercises it could be beneficial for Exercise Control to provide or "front-	TSO / CCO

		from the Control Room. As the Firstgas Control System was using 'live' current pipeline data, the Control Room had no survival time data that was appropriate to the exercise. In a real event there would be no issue providing survival time updates.	load" supporting operational information relevant to the exercise scenario. This would help the authenticity and flow of the exercise.	
6.	r25(1)(d), r25(1)(e) r55 - 57	<p>The quality, quantity and timeliness of curtailment compliance updates by Retailers did vary throughout the exercise.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>• old templates were used and some populated inaccurately</li> <li>• some updates were provided after the requested deadline</li> <li>• some updates recorded unnecessary curtailments</li> <li>• some updates sent directly to the CCO rather than to the requested TSO emails</li> <li>• Discrepancy between Registry number of ICP's and those provided by Retailers</li> </ul>	<p>Continue to work with Retailers and Large Consumers to ensure that they understand curtailment compliance processes and expectations.</p> <p>Re-offer "one-on-one" Firstgas training sessions with Retailers / Large Consumer and reiterate compliance requirements in correspondence and CCO training leading up to next test exercise.</p> <p>Such sessions proved to be beneficial this year especially in light of a number of new Retailers (who performed well during Exercise Aitua).</p> <p>Continuing difference between registry numbers of ICPs and Retailer provided number of ICP's to be explored.</p>	TSO / GIC
7.	N/A	A Retailer provided the TSO with an example of the type of communications they send their consumers in response to curtailment directives from the TSO and/or the request from the CCO to initiate media appeals to domestic consumers to conserve gas.	TSO, CCO and GIC may wish to consider the options available to review the accuracy of such Retailer communications to help ensure efficient and effective outcomes during a critical contingency event.	TSO / CCO / GIC

#### 6.10. CCO's Overall Assessment of the Firstgas Response

The CCO concludes Firstgas has established detailed procedures that define the roles, responsibilities, and tasks required to respond effectively to critical contingency events. These procedures underpin the Critical Contingency Management Plan (CCMP), and they rely on experienced personnel to ensure timely and accurate execution during an actual event.

Firstgas demonstrated a marked improvement in urgency and responsiveness at the start of the exercise, as shown by its prompt receipt of and response to the initial inject and associated notifications. This suggests that the training undertaken during the year had a positive effect. However, the period between declaration and curtailment highlighted areas where the application of existing processes did not align with required timeframes. In a fast-moving event, the ability to move quickly from declaration to curtailment will be critical to achieving the purpose of the regulations. Section 5 of this report provides recommendations which would enhance the efficiency of the processes and procedures that support the current framework.

## 7. Assessment of CCO Performance Against Exercise Objectives

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

The Communications Protocol outlines timeframes and processes for Firstgas to provide the CCO with timely and relevant information required for issuing notices to stakeholders.

The first exercise inject was issued at 09:00. Firstgas subsequently alerted the Duty CCO by SMS at 09:03 and requested they contact the Control Room.

The Duty CCO responded to the SMS at 09:04 and was advised that there had been damage to the Firstgas Bay of Plenty Pipeline in the Waikato near Arapuni resulting in a significant gas escape and the pipeline needed to be isolated.

The CCO advised the TSO that the conditions indicate a critical contingency had occurred. The CCO advised that a declaration notice will be issued as soon as possible.

The CCO requested a Security of Supply alert to be sent, which was received at 09:12.

The CCO sent a draft declaration notice to the TSO which was confirmed as correct by the TSO promptly. The CCO then issued the critical contingency declaration notice to the TSO copying in stakeholders at 09:37 and the TSO sent a declaration notice to the industry via OATIS at 09:48.

#### **Observations:**

- *The initial alert to the CCO was prompt and contained accurate information.*
- *Access to information in the Control Room was good, it enabled the identification of the isolation points and the affected threshold.*
- *The Security of Supply alert #1 did not reference "Exercise Aitua"*
- *It took 48 minutes from the first inject to the communication of the declaration notice to industry by the TSO, which was 10 minutes quicker than the last annual exercise where an oral declaration process was followed.*

#### **Recommendation:**

- *Firstgas to review how the Security of Supply can include an exercise title when appropriate.*

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

The CCO determined that the isolation of the Firstgas Bay of Plenty pipeline constituted a regional critical contingency as it was only affecting a part of the transmission system.

#### **Observation:**

- *The regional critical contingency status was correctly notified as part of the declaration notice.*

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

The CCO issued the following Notices for the exercise:

09:37      Critical Contingency Declaration Notice emailed to TSO and stakeholders CC-093.

10:49      Demand Curtailment Notice emailed to TSO and stakeholders CC-094.

- 11:54 Revised Demand Curtailment Notice emailed to TSO and stakeholders CC-095.
- 11:58 Implement Media Appeals Notice emailed to Retailers and stakeholders CC-096.
- 12:47 Status Update Notice CC-097.

**Observations:**

- *The notices were delivered to the appropriate parties, contained accurate information, and were issued within the required regulatory timeframes.*
- *The CCO initially had an issue with creating links to notices on the CCO website. This was resolved in the moment by changing the process to adding the file instead of a link.*

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

Once it was established a critical contingency existed and the pipeline would need to be isolated with a repair time of at least 72 hours, the CCO initiated a demand curtailment to Band 4. When it had been established that the actual repair time would be 96 hours, the CCO calculated that demand curtailment to band 6 would be required as a minimum to stabilise the transmission system while pipeline repairs were carried out, so implemented a revised curtailment.

**Observations:**

- *In this regional scenario the exploration of opportunities for additional gas was not applicable.*
- *The process for demand restoration was not tested as a part of this scenario.*
- *The TSO showed a strong sense of urgency to determine the level of curtailment.*
- *However, the TSO has no numerical basis to underpin their view on the amount of curtailment required so is vulnerable to reaching a view that either underestimates or overreaches. In this exercise they were keen to curtail to band 6 before an estimate of the repair time had occurred.*
- *The CCO therefore supports the Firstgas observation and recommendation to explore options for the provision of consistent quantitative system conditions and modelling data to underpin curtailment recommendations (See section 5, item 8 above).*

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

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

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

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

**Observation:**

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

#### 7.7. CCO publishes information [r54A, Schedule 5]

The CCO had obligations to provide public statements in accordance with Schedule 5 of the regulations by 13:00.

At 11:15, the CCO requested that Firstgas provide an Asset Owner Statement that would inform the CCO's Status Update Notice. Firstgas provided the CCO with a draft Asset Owner Statement to review and then issued it in accordance with Schedule 5 of the regulations at 11:50.

The CCO sent out the required status update at 12:47.

**Observation:**

- *The CCO published a Status Update Notice (CC-092) at 13:00 that contained the information specified in Schedule 5 of the regulations by the required deadline.*

#### 7.8. CCO performs to the required standard [SPACCO Schedule 2]

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

**Observation:**

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

## 8. Assessment of Retailers and Large Consumers against Exercise Objectives

### 8.1. Participation

All Retailers and large consumers were requested to participate in the exercise and provided with a Participants Brief on 25 February. This Brief provided information on how the exercise would be structured and managed, the level of participation required for the exercise, and the test objectives of the exercise.

Prior to the exercise, the CCO provided annual training for all stakeholders, designed as an introductory overview and refresher. This was delivered via Teams on 22 April. The session was well attended and received positive feedback.

Post exercise, Retailers were asked to provide feedback to the CCO using a Retailer Curtailment Plan Testing Report Template (refer Appendix D) within 7 business days of completion of the exercise.

#### **Observation:**

- *All Retailers participated in the exercise. Large Consumers were not affected by the scenario, but the CCO understands that some of them took the opportunity to test their own processes for a critical contingency.*
- *All Retailers provided feedback on the testing of their Retailer Curtailment Report.*

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

Retailer Curtailment Plans are submitted by Retailers to Gas Industry Company and are not held by the CCO.

#### **Observations:**

- *The CCO is unable to verify whether Retailers Curtailment Plans contain sufficient contact information.*
- *The CCO requested that Retailers, as part of their feedback, provide a description of the process in place to ensure consumer emergency contact details are maintained and up to date in accordance with regulation 43.*
- *The information provided by Retailers provides some assurance that appropriate processes and systems are in place for managing consumer contact details.*

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

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

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

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

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

The feedback received from the Retailer Curtailment Plan Testing Reports on testing of emergency contact details is shown below:

**Contact Energy**

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	29	1549	3	2659	112
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?		43		213	8
For the consumers contacted to verify contact details, what percentage were incorrect?		16%		16%	0%
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?	<p>At a maximum, 5 mins per call.</p> <p>In a real emergency, in addition to calling customers we would organise bulk SMS updates to be sent to impacted customers and website messaging. It is not practical to complete this step during the test exercise.</p>				

**Genesis Energy**

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	35	906	-	2446	10

<b>Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?</b>	35	906	-	2446	10
<b>For the consumers contacted to verify contact details, what percentage were incorrect?</b>	10%	6%	-	5%	0%
<b>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?</b>	1 hour	4 hours	-	10 hours	1 hour

### Mercury (inc Trustpower)

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?		13	1	71	
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?		13	1	71	
For the consumers contacted to verify contact details, what percentage were incorrect?		None	None	None	
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?		50 minutes	10 minutes	2.5 Hours	

### Nova

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	173	2,875	7	4,561	86

Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	<ul style="list-style-type: none"> <li>Planned customer contact activities for 2026 include communications to natural gas customers requesting review and confirmation of current contact details to support contingency preparedness obligations.</li> </ul>
For the consumers contacted to verify contact details, what percentage were incorrect?	<ul style="list-style-type: none"> <li>Based on previous contact verification activities, approximately 5% of customer records require some level of update or amendment annually.</li> </ul>
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?	<ul style="list-style-type: none"> <li>Current estimates indicate customer communications could be prepared and issued within approximately 30 minutes via available SMS and email communication channels.</li> <li>Actual timeframes may vary depending on operational conditions, timing of the event, and the day on which the event occurs.</li> </ul>

**Pulse**

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?				1	
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?				1	
For the consumers contacted to verify contact details, what percentage were incorrect?				0%	
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?	0	0	0	15mins	0

## Greymouth

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
4. How many consumers do you have in each curtailment band?	46	69		6	0
5. Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	Prior to the exercise, all.				
6. For the consumers contacted to verify contact details, what percentage were incorrect?	Some were updated.				
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?	It depends on the circumstances, e.g. whether in or out of office and the time the message was received by the company agent (not by the tool of that agent) regardless of when the TSO were to send a text; and it depends on the clarity of the instruction received.				

## Visy

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	1				
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	1				
For the consumers contacted to verify contact details, what percentage were incorrect?	0				
If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	5 mins				

**Clay Bricks Limited**

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	1				
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	1				
For the consumers contacted to verify contact details, what percentage were incorrect?	0%				
If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	20 min				

**Evonik Peroxide Limited**

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	1				
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	1				
For the consumers contacted to verify contact details, what percentage were incorrect?	0%				
If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	20 min				

**NZ Hothouse Limited**

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	2				
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	2				
For the consumers contacted to verify contact details, what percentage were incorrect?	0%				
If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	20 min				

**Pan Pac Forest Products Limited**

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	5	2			
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	5	2			
For the consumers contacted to verify contact details, what percentage were incorrect?	0%	0%			
If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	20 min	20 min			

## Transgas Limited

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	3	1			
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	3	0			
For the consumers contacted to verify contact details, what percentage were incorrect?	0%	0%			
If the exercise scenario was a real event, how long would it have taken you to contact all the consumers in each of the curtailment bands?	20 min	20 min			

### Observations:

- *It was good to see active participation from the new smaller Retailers*
- *Several Retailers commented on the value of the annual exercise for reviewing their processes, in particular in light of recent staff changes.*
- *A number of Retailers had changed their estimate of how long it would take them to contact consumers which suggests recent process review/improvements since the last exercise*
- *Ballance had recently become a Retailer. Although the CCO had contacts for Ballance in their stakeholder database none of these contacts had been added to the Retailer sub-group, so Ballance wouldn't have received any Retailer specific communications from the CCO, such as the request for Retailer feedback.*
- *A component of the critical contingency pressure thresholds is a time allowance for curtailment of demand on an affected part of the system to take effect. The feedback from Retailers suggests that the speed with which Retailers would be able to contact all affected consumers varies and appears to be dependent on the availability of personnel at the time of an event*

### Recommendation:

- *CCO to add contact details for Ballance to the Retailer sub-group within the CCO contact database.*
- *Retailers keep their processes for contacting consumers affected by a critical contingency under regular review to find opportunities for continuous improvement to ensure that all consumers could be contacted within the time allowed under the critical contingency pressure thresholds*

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

The exercise scenario required curtailment of all consumers up to and including Band 6. With this level of curtailment, any consumers with approved supply designations (except critical care designations) were required to curtail all demand immediately.

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

Retailers provided curtailment compliance updates to Firstgas using the Firstgas Retailer Curtailment Compliance Template. The Retailer updates were consolidated into a single update and provided to the CCO.

##### **Observations:**

- *Firstgas provided timely and accurate consolidated update information. It was noted the covering email provided useful narrative about the compliance data including concerns where the quality of the data supplied was in doubt and reassurance that those queries were being followed up.*
- *Firstgas noted that one update was received after the deadline; one Retailer didn't send a further update after the revised curtailment notice was sent; one Retailer sent data that must be erroneous as it implied curtailment of more than 100%;*
- *There was a good response from some of the new smaller Retailers.*
- *Firstgas intend to continue working with Retailers to ensure they understand compliance processes and expectations.*

#### 8.6. Retailers to Implement Media Appeals [r53]

The following Retailers are signatories to the Domestic Gas Retailers Communications Protocol: Contact Energy, Genesis Energy, Mercury (including Trustpower), and Pulse Energy. Under this protocol, a "Lead Retailer" is designated annually to represent all signatories during a critical contingency event, specifically in organising media appeals to request domestic gas consumers to conserve gas. Genesis is the Lead Retailer for 2026.

##### **Observations:**

- *It was good to see this year's lead Retailer take an active approach by reviewing and updating the protocol on taking over the role at the start of the year*
- *During the exercise the lead Retailer acted alone in producing the draft media appeal, but acknowledged in an actual event they would have involved the other signatories to the protocol*
- *The CCO noticed that the media appeal drafted under the protocol included Nova in the list of Retailers on behalf of whom the media statement was being made, although Nova is not a signatory to the protocol.*
- *Nova Energy prepared a media appeal for its consumers in the affected area.*

##### **Recommendation:**

- *Nova and the lead Retailer should confirm whether Nova will join the Retailer media appeal protocol or continue issuing its own media appeal.*

#### 8.7. CCO's Overall Assessment of the Retailers Response

Once again it was good to see active participation by Retailers, including the new Retailers and signs of on-going process review. Feedback from Retailers provides some assurance that appropriate processes and systems are in place for managing consumer contact details.

The CCO recommends that Retailers continue to review their process for contacting consumers affected by a critical contingency to ensure that all consumers could be contacted within the time anticipated under the current critical contingency pressure thresholds.

## **9. Assessment of Asset Owners Against Exercise Objectives**

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

Firstgas was the affected asset owner in the exercise. Firstgas provided an Asset Owner Statement to the CCO for review at 11:34, the statement was issued at 11:50 and published on OATIS at 11:55 (see appendix F). An updated Asset Owner Statement was also drafted and supplied to the CCO for review at 13:38.

#### **Observations:**

- *The asset owner statement process was both efficient and effective. The statement contained the information specified in Schedule 5(2) of the regulations and was made available in a timely manner.*

## **Appendix A – Exercise Injects**

**Inject #1 for TSO.      09:00am**

### **Exercise Aitua**

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

A Firstgas Field Technician is calling the Control Room to report that they have arrived on site at 1428 Arapuni Road near Parawera to issue a permit. The contractor has started work before he arrived and has struck the 500 pipeline. There is a large escape of gas and it's making a roaring sound. The pipeline will need isolating. The nearest isolation points are Parawera Road MLV upstream and Arapuni West MLV downstream.

Further advice on the Transmission system conditions will be provided before 10:00am.

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

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

### **Exercise Aitua**

**Inject #2 for TSO.      09:49am**

### **Exercise Aitua**

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

- Field staff have isolated the Bay of Plenty pipeline between Parawera Road MLV and Arapuni West MLV.
- The pipeline has been punctured by an excavator.
- An assessment of the pipeline damage is underway to determine what repair will be required.
- Estimated time to repair is not known but will be at least 72 hours.

Further advice on the pipeline conditions will be provided before 11:00am.

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

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

### **Exercise Aitua**

**Inject #3 for TSO      11:08am**

**Exercise Aitua**

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

- The pipeline damage has been assessed. The pipeline has been punctured, dented and gouged so the damaged section will need to be cut-out and replaced.
- Estimated repair time is 96 hours.

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

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

**Exercise Aitua**

**Inject #4 for all Participants.    15:05pm**

**Exercise Aitua**

There will be no further injects for the exercise.

For this scenario which would span more than 96 hours, demand restoration requirements would be subject to on-going review by the CCO, and regular status updates would be provided.

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

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

Any queries or feedback regarding this inject can be sent to [cco@cco.org.nz](mailto:cco@cco.org.nz).

**Exercise Aitua**

## Appendix B – Exercise Event Log

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

<b>Event:</b>	<b>Exercise Aitua</b>	<b>Date:</b>	<b>13/5/2026</b>
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Time	From	To	Details
08:30			CCO Website Current Events page updated to say Exercise Aitua has commenced.
08:36	Exercise Control	CCO Email Contacts	Email to advise Exercise Aitua has commenced
08:41	Exercise Control	CCO SMS Contacts	SMS to advise Exercise Aitua has commenced.
09:00	Exercise Control	BBK Control Room	Inject #1 issued by email to BBK Control Room and followed up with phone call.
08:56	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 81390 "EXERCISE AITUA - CCO Test Exercise for Wednesday 13 May 2026 -" - Action Required.
08:57	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 81389 " EXERCISE AITUA – CCO Test Exercise for Wednesday 13 May 2026 -" - Action Required.
09:03	BBK Control Room	CCO	Gas Controller sends SMS to CCO requesting Duty CCO to contact Control Room.
09:04	CCO	BBK Control Room	Firstgas has advised the CCO that there has been damage to the Firstgas Bay of Plenty Pipeline in the Waikato near Arapuni resulting in a significant gas escape and the pipeline will need to be isolated. <b>CCO advises the TSO that the conditions indicate a critical contingency has occurred. The CCO advises that a declaration notice will be issued as soon as possible.</b> CCO requests a Security of Supply alert to be sent.
09:12	BBK Control Room	CCO	Security of Supply Alert #1 issued. 12 minutes after inject #1 provided.
09:16	TSO Intelligence - EMT	CCO	Firstgas confirm with CCO that CCO is preparing declaration notice
09:18	CCO	BBK, EMTL, IMT	Draft Critical Contingency Notice CC-093 issued for review.
09:22	CCO	GIC	Call to advise CC being declared.
09:24	EMTL	CCO	Confirming content of Notice is correct.

<b>Time</b>	<b>From</b>	<b>To</b>	<b>Details</b>
09:37	CCO	TSO & Stakeholders	<b>CC Declaration Notice CCO-093 emailed to TSO and Stakeholders.</b>
09:45	CCO		Website updated with CC Declaration Notice CC-093.
09:46	TSO Intelligence - EMT	CCO	Call to advise who has taken on the CCO Liaison role and establishing contact.
09:48	CCO	CCO SMS Contacts	SMS text advising CC-093 has been published.
09:48	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 81391 "Exercise Aitua –Critical Contingency Declaration Notice CC-093" - Action Required. 48 minutes after inject #1 issued.
09:51	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 79013 "Exercise Aitua –Critical Contingency Declaration Notice CC-093" - Action Required. 51 minutes after inject #1 issued.
09:49	Exercise Control	BBK Control Room	Inject #2 emailed and followed with phone call.
10:00	TSO Intelligence - EMT	CCO	Call to advise repair time at least 72 hours. Curtailment required. Confirmed initial curtailment of Bands 3 & 4. CCO requested SoS Report. 11 minutes.
10:21	CCO	TSO Intelligence - EMT	Advised that SoS #2 has not yet been received.
10:29	TSO Intelligence - EMT	CCO	Security of Supply Alert #2 issued. 40 minutes after inject #2 provided. Event time changed in error.
10:30	CCO	BBK, EMTL, IMT	Draft Demand Curtailment Notice CC-094 issued for review.
10:31	CCO	GIC	Call to advise Demand Curtailment Notice being prepared for issue.
10:43	TSO Intelligence - EMT	CCO	Confirmation of content of Demand Curtailment Notice CCO-094
10:47	Genesis	CCO	Phone call to advise they have not seen a Declaration Notice via Firstgas from OATIS.
<b>10:49</b>	<b>CCO</b>	<b>TSO &amp; Stakeholders</b>	<b>Demand Curtailment notice CCO-094 emailed to TSO and Stakeholders.</b>

Time	From	To	Details
10:50	CCO		Website updated with Demand Curtailment Notice CC-094.
10:51	CCO	CCO SMS Contacts	SMS text advising CC-094 has been published.
10:52	CCO	GIC	Formal request to GIC confirming they are authorized to support the CCO with media related activities.
10:58	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 81393 "Exercise Aitua" – Direction to Curtail Demand Notice CC-094" - Action Required. 9 minutes after CCO Notice issued.
10:58	TSO Intelligence - EMT	CCO	Call from Firstgas suggesting that we will need to go deeper on the curtailment and recommend considering moving to band 6.
11:01	CCO	TSO Intelligence - EMT	CCO asked Firstgas for the estimated system survival time. Firstgas advised that it was not yet available.
11:03	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 81394 "Exercise Aitua" – Direction to Curtail Demand Notice CC-094" - Action Required. 14 minutes after CCO Notice issued.
11:08	Exercise Control	BBK Control Room	Inject #3 emailed to Control Room and followed up with phone call.
11:15	CCO	TSO Intelligence - EMT	Request Asset Owner Statement to be provided by 12:30.
11:27	TSO Intelligence - EMT	CCO	Phone call to advise repair time is now 96 hours. CCO recommended to curtail to Band 6 and issue a Retailer Media Appeal. TSO concurred. CCO requested SoS report.
11:34	TSO Media	CCO	Asset Owner Statement provided for review.
11:40	TSO Intelligence - EMT	CCO	Security of Supply Update #3 issued. 32 minutes after inject #3 provided.
11:41	CCO	BBK, EMTL, IMT	Draft Revised Demand Curtailment Notice CC-095 issued for review.
11:46	CCO	GIC	Message left to advise that Revised Curtailment Notice to Bands 5 & 6 will be issued and a Retailers Media Appeal Notice.

Time	From	To	Details
11:49	TSO Intelligence - EMT	CCO	Confirmation of Revised Demand Curtailment Notice CCO-095
11:50	TSO Media	CCO	Asset Owner Statement #1 issued.
11:54	<b>CCO</b>	<b>TSO &amp; Stakeholders</b>	<b>Revised Demand Curtailment notice CC-095 emailed to TSO and Stakeholders.</b>
11:54	CCO		Website updated with Revised Demand Curtailment Notice CC-095.
11:54	CCO	CCO SMS Contacts	SMS text advising CC-095 has been published.
11:54	TSO Media	CCO	First Asset Owner Statement issued.
11:55	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 81396 "Exercise Aitua" – Firstgas Asset Owner Statement.
11:57	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 81394 "Exercise Aitua" – Firstgas Asset Owner Statement.
11:58	<b>CCO</b>	<b>TSO &amp; Stakeholders</b>	<b>Retailers to Implement Media Appeals Notice CC-096 emailed to TSO and Stakeholders.</b>
12:00	CCO		Website updated with Revised Demand Curtailment Notice CC-096.
12:00	CCO	CCO SMS Contacts	SMS text advising CC-096 has been published.
12:09	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 81398 "Exercise Aitua" – Direction to Revise Demand Curtailment and Regional Status Update - CC-095. 15 minutes after Notice issued by CCO.
12:11	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 81394 "Exercise Aitua" – Direction to Revise Demand Curtailment and Regional Status Update - CC-095. 17 minutes after Notice issued by CCO.
12:15	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 81400 "Exercise Aitua" – Critical Contingency Status Update Notice to Retailers to Implement Media Appeals - CC-096. 17 minutes after Media Appeal Notice issued by CCO.
12:16	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 81401 "Exercise Aitua" – Critical Contingency Status Update Notice to Retailers to Implement Media Appeals - CC-096. 18 minutes after Notice issued by CCO.
12:41	GIC	CCO	Draft Media Release issued for review.

Time	From	To	Details
12:46	CCO	GIC	Confirmation that Media Release is correct.
12:47	<b>CCO</b>	<b>TSO &amp; Stakeholders</b>	<b>Status Update Notice CC-097 emailed to TSO and Stakeholders.</b>
12:47	CCO		Website updated with Status Update Notice CC-097.
12:47	CCO	CCO SMS Contacts	SMS text advising CC-097 has been published.
13:07	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 81404 "Exercise Aitua" – Status Update CC-0097" - Action Required. 30 minutes after CCO Notice issued.
13:09	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 81405 "Exercise Aitua" – Critical Contingency Status Update CC-097" - Action Required. 32 minutes after CCO Notice issued.
13:23	Critical Compliance	CCO	1 <sup>st</sup> consolidated update of Retailer curtailment compliance.
13:27	Lead Retailer	CCO	Media release for Domestic Gas Conversation appeals issued.
13:37	Critical Compliance	CCO	2 <sup>nd</sup> consolidated update of Retailer curtailment compliance.
13:38	TSO Media	CCO	Asset Owner Statement #2 issued for review.
13:38	TSO Intelligence - EMT	CCO	Security of Supply Update #4 issued.
13:43	CCO	TSO Media	Confirmation that Asset Owner Statement looks correct. is correct.
14:11	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 81406 "Exercise Aitua" – Critical Contingency - Firstgas Asset Owner Statement Update 15 May 2026.
14:16	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 81407 "Exercise Aitua" – Critical Contingency - Firstgas Asset Owner Statement Update 15 May 2026.
14:37	TSO Intelligence - EMT	CCO	Security of Supply Update #5 issued.
15:06	Critical Compliance	CCO	3 <sup>rd</sup> consolidated update of Retailer curtailment compliance.
15:06	Exercise Control	CCO Email Contacts	Inject #4 issued. Confirming the final inject.

<b>Time</b>	<b>From</b>	<b>To</b>	<b>Details</b>
15:37	CCO	GIC	Call advising Exercise Aitua has ended.
15:39	Exercise Control	CCO Email Contacts	Email to advise Exercise Aitua has ended.
15:40	CCO		Website updated to advise Exercise Aitua has ended.
15:40	CCO	Stakeholders	SMS to advise Exercise Aitua has ended.
15:43	CCO	Retailers	Retailer Feedback Template issued.
15:45	TSO	Stakeholders	OATIS notices notifying of the end of the exercise
15:59	Nova	TSO	Copy of Media Appeal provided.
16:07	BBK Control Room	CCO	Final Security of Supply Update

## Appendix C – Notice Summary

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

Firstgas TSO notices can be viewed on the OATIS website at: <https://www.oatis.co.nz> using 'Notice Search' button and begin date of 21/05/25

### CCO Notices to TSO

CCO Notice ID	Notice Type	Time CCO provided Notice to TSO	Time TSO Published CCO Notice	
			OATIS (Maui)	OATIS (Firstgas)
CC-093	Critical Contingency Declaration	09:37	09:48	09:51
CC-094	Direction to Curtail Demand	10:49	10:58	11:03
CC-095	Revised Demand Curtailment Notice	11:54	11:55	11:57
CC-096	Retailers to Implement Media Appeals Notice	11:58	12:09	12:11
CC-097	Status Update Notice	12:47	13:07	13:09

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

## Appendix D – Retailer Curtailment Plan Feedback Template

### Retailer Curtailment Plan Testing Report - Exercise Aitua

Retailers should use this report template to report their findings to the CCO by **Friday 30 May**

<b>Retailer Name</b>					
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).					
<b>Consumer Curtailment</b>	<b>Curtailment Band</b>				
	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?					

## Appendix E – Retailers Media Appeal Statement

Signatories of Domestic Gas Retailers Communications Protocol

### Exercise Aitua

Below is the media release Genesis would produce as this year's lead Retailer:

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13 May, 2026

#### **Gas emergency sparks call to reduce consumption**

Residential and commercial gas consumers have been asked to urgently reduce gas use following damage to a Waikato pipeline, leading to a significant gas escape.

Regions affected are Bay of Plenty, Rotorua, Taupō and Gisborne. It is expected to take at least 96 hours to repair the Firstgas pipeline at Arapuni.

In response to the critical contingency emergency, gas curtailment notices have been issued to industrial, medium and small commercial gas consumers.

As the gas supply system has not stabilised, gas retailers are now asking residential consumers in the affected areas to reduce their gas usage to a minimum until further notice.

Any commercial customers 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.

Stephen England-Hall of Genesis Energy, speaking on behalf of all gas retailers in the affected regions, says the conservation measures are designed to extend the availability of gas for as long as possible while efforts are made to restore normal supply.

“Public safety is the number one concern, and field crews have been mobilised to the site at Arapuni,” said England-Hall. “New information will be provided as it comes to hand.”

England-Hall asked consumers to note they should not turn off their gas service valve at the gas meter.

“Gas is still safe to use. The issue is one of supply. We are simply asking consumers to reduce use of gas as much as possible by not using gas appliances such as gas-fired heaters, stoves, hobs, and gas-heated hot water, or only using appliances sparingly.”

While any effort is appreciated, vulnerable and elderly customers should not compromise their personal health or safety.

***This message is provided by the following retailers – Genesis Energy, Contact Energy, Mercury, Nova, and Pulse Energy***

ENDS

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### **Social media post**

A heads-up for our residential and commercial gas customers in Bay of Plenty, Rotorua, Taupō and Gisborne – please urgently reduce your gas use now. It is still safe to use gas, but damage to a pipeline at Arapuni has created emergency supply issues. Teams are working on a fix, but the problem may not be sorted for at least 96 hours. Until then, please use your gas appliances only when you really need to. While any effort is appreciated, vulnerable and elderly customers should not compromise their personal health or safety.

We'll keep you posted on progress in getting supply back to normal.

*The Communication Manager of each gas retailer will supply this post to their social media lead and ensure its publication.*

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In the event that this was an actual event and not an exercise, Genesis would get approval on comms from the following parties:

### **Nova Energy Media Appeal**



#### **Media Advisory**

##### **Media alert to residential natural gas consumers**

This is a message for residential natural gas consumers in Bay of Plenty, and affected areas Rotorua, Taupo and Gisborne.

The national natural gas pipeline has been damaged by a third-party causing a significant escape of natural gas.

As a result of this incident, a critical contingency emergency is now in effect for customers Bay of Plenty. We are asking natural gas consumers, except for those with approved critical designations, to stop using their natural gas immediately.

Any consumers who have not yet been contacted by their retailer should cease using gas in anticipation of being directed to do so. These conservation measures are designed to extend the availability of natural gas for as long as possible while repair work is completed to restore normal supplies.

Public safety is our number one concern, and field crews have been mobilised to the repair the pipeline.

The estimated time to resolve this incident is approximately 96 hours. New information will be provided as it comes to hand.

Please note we do not want consumers to turn off their natural gas meters valves. Consumers in the affected areas are just requested to stop using natural gas by ceasing to use their gas appliances for example, gas-fired heaters, stoves/hobs, and hot water.

Essential service business, hospitals and rest homes with approved critical designations are not affected at this stage.

ENDS

Further information contact:

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Tel: 021 278 8221


Email: [amckenzie@toddcorporation.com](mailto:amckenzie@toddcorporation.com)

## F - Asset Owner Statement

Firstgas Asset Owner Statements under CCM Regulations



### FGL Schedule 5(2) CCM Regulations Public Statement Template

<b>Firstgas Limited – Gas Transmission System Event</b> 	
<b>Public Statement / Update:</b>	
<b>Report No:</b>	2026/05/13 - Update No. 1
<b>What has Happened?:</b>	<p>This morning Firstgas became aware of damage to the Firstgas Bay of Plenty Pipeline in the Waikato near Arapuni, resulting in a gas escape and the pipeline has been isolated.</p> <p>The Critical Contingency Operator has declared a Critical Contingency and issued demand curtailment band 3 and 4 instructions to manage the affected parts of the transmission system until the required repairs are completed and Firstgas assets return to service. Please see <a href="http://www.cco.org.nz">www.cco.org.nz</a> for further details on the location and extent of the curtailment instructions.</p>
<b>Actions Being Taken to Effect Repairs:</b>	Firstgas has mobilised an emergency response to repair the pipeline.
<b>Estimation of the Likely Duration of each Step of the Repair Process:</b>	An engineering assessment of the pipeline damage is underway.
<b>Estimated Time of When the Component will be Returned to Service:</b>	The estimated time to repair is a minimum of 96 hours.
<b>Will the Component be Temporarily Restored to a Reduced Level of Service?:</b>	Not expected.

- Further information on First Gas Limited and the Gas Transmission System can be found on the Firstgas website [www.firstgas.co.nz](http://www.firstgas.co.nz)
- The Critical Contingency Operator is also required to make regular public statements and updates, which will be posted on the CCO website [www.cco.org.nz](http://www.cco.org.nz)