


# CRITICAL CONTINGENCY OPERATOR


# COMMUNICATIONS PLAN

PREPARED IN ACCORDANCE WITH THE GAS GOVERNANCE  
(CRITICAL CONTINGENCY MANAGEMENT) REGULATIONS  
2008 AND 2013 AMENDMENTS

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Rev	Date	Description	Prepared By	Checked By	Consultation Completed
10	01/03/22	Updated for change from Core Group to Plant & Platform	RD	GA	24/02/22
11	17/10/22	Updated Notice Templates for Revised FGL CCMP	GA	JL/RD	07/09/22
12		Updated to align with revised CCMP.	GA	JL	24/03/26

## 1.0 PURPOSE

This Communications Plan sets out how the Critical Contingency Operator (CCO) and the Transmission System Owner (TSO) will communicate during a critical contingency, as required by Regulation 35 of the Gas Governance (Critical Contingency Management) Regulations 2008 (the Regulations).

- First Gas Limited (Firstgas) is the TSO.
- The plan has been prepared by the CCO in consultation with Firstgas.
- Terms used here have the same meaning as in the Regulations.
- Stakeholders are as defined in the CCO Information Guide

## 2.0 REVIEW AND AMENDMENT

The CCO may update this plan after consulting with the TSO, in line with Regulation 35(4).

After any actual contingency, the CCO will prepare a performance report (Regulation 65) to assess how well the plan worked. If changes are recommended, the plan will be revised and republished.

After any exercise to test the Critical Contingency Management Plan (CCMP) (Regulation 34), the CCO will prepare a report identifying improvements to this plan.

### 3.0 OVERVIEW

On 1 November 2021, the Gas Industry Company (GIC) appointed Plant & Platform Consultants Limited (P&P) as the CCO under the Regulations.

A critical contingency occurs when gas supply cannot meet demand, and transmission system pressure drops to a level requiring intervention to maintain supply to networks and consumers.

The Regulations aim to manage serious gas outages and supply risks effectively, without harming long-term security of supply.

The CCO's role includes:

- Deciding when a critical contingency has begun
- Deciding whether it affects a specific region
- Receiving and assessing information from the TSO and stakeholders
- Calling for load curtailment when needed to keep the system in balance
- Looking for ways to increase gas supply
- Monitoring supply and demand and adjusting curtailment as needed
- Restoring demand in an orderly way so the contingency can end efficiently
- Keeping stakeholders informed and publishing updates
- Deciding when it is safe to end a critical contingency
- Post event reporting

The TSO always remains in direct control of the transmission system.

During a critical contingency:

- The TSO activates the processes in its CCMP and emergency response plans
- The CCO issues directions to the TSO that align with the Regulations, the CCMP, and the Communications Plan
- The CCO issues directions to stakeholders in line with the Regulations and this plan
- The TSO issues directions to Retailers and Large Consumers in line with the Regulations and the CCMP

## 4.0 PROVISION OF INFORMATION & COMMUNICATIONS

The CCO needs continuous access to transmission system information, even when there is no critical contingency. This ensures the CCO stays informed and ready to act if a critical contingency arises.

A Communications Protocol (CCO-021) (the Protocol) sets out what information the TSO must provide:

- During normal system conditions
- During abnormal conditions that do not yet qualify as a critical contingency

The Protocol also details information requirements during potential and actual contingencies. These requirements align with Regulations 38 and 38A.

If there is any conflict between this Communications Plan and the Protocol, this plan takes priority.

A summary of the Protocol is included in Appendix 1.

## 5.0 COMMUNICATIONS WITH TSO

The CCO will communicate with the TSO in person, by phone, video conference, or by email.

If landline and mobile services are unavailable, satellite phones or face-to-face communication will be used.

The TSO allows the CCO to operate from the Firstgas Control Room (or nearby) during a critical contingency.

### 5.1 Normal issuing of Notices

The CCO will consult with the TSO before issuing notices to ensure they reflect the situation accurately.

Notices are classified as **ordinary** or **urgent**:

**Ordinary notices** are normally in writing, sent by email, and published on the CCO website. A link may also be sent by SMS. Either email or SMS alone counts as valid notice.

**Urgent notices** may be given orally if needed, with written confirmation provided as soon as possible.

Notices are considered issued at the time they are time-stamped and sent from the CCO's system.

Standard notice templates are not included in this plan because critical contingencies may require flexible formats. However, the TSO and CCO may elect to publish examples of notices that may be used for critical contingency purposes on the publications section of the OATIS and CCO websites.

All issued notices will be published on the CCO website.

### 5.2 Alternative methods for issuing Notices

If email or PC systems are unavailable, notices will be given by phone or other voice systems, with written confirmation sent later by email or SMS. The time and date of phone notices will be agreed during the call.

If the CCO website is unavailable, the TSO will be informed immediately, and notices will continue by email or verbally.

Notices may also be hand-delivered if systems are down. The time of delivery is when the TSO receives the notice.

If landline and mobile services are unavailable, satellite phones or face-to-face communication will be used.

### **5.3 CCO Contacts Database for Notices**

The CCO maintains a contacts database of persons nominated by the TSO to receive notices via email and/or truncated SMS text message.

The CCO carries out routine quarterly email and SMS tests of the contacts listed in the database to ensure it is current.

The TSO will notify the CCO of changes to any nominees or their contact details.

## 6.0 PRIOR TO A CRITICAL CONTINGENCY DECLARATION

The Transmission System Codes define the TSO's rights and obligations before and during a contingency.

Before a contingency is declared, the TSO may take remedial actions such as purchasing balancing gas and/or maximising throughput using compressors

- Reconfiguring the transmission system
- Curtailing interruptible contracts
- Issuing operational flow orders (OFOs)
- Curtailments or shutdowns

### **Notification requirements:**

If the TSO believes an event could lead to a critical contingency (breaching thresholds in the CCMP):

- The CCO must be notified by phone within 15 minutes
- Written confirmation must follow within 30 minutes

### **Managing transient conditions:**

Temporary pressure fluctuations should not trigger unnecessary critical contingency declarations. Equally, they should not delay a declaration when one is genuinely needed. Communications between the CCO and TSO will take this into account. Appendix 8 of the CCMP has more information on transient operating conditions.

## 6.1 Potential Critical Contingency Declaration

If the CCO believes an event could breach one or more critical contingency pressure thresholds (as defined in the CCMP), it may issue a Potential Critical Contingency Notice to the TSO.

The CCO will also notify stakeholders listed in the CCO Information Guide and publish the notice on the CCO website. The notice may include:

- Details of the event
- The affected parts of the transmission system
- A summary of actions being taken to resolve the issue (if available)

This is an optional process that is not set out in the regulations but may be used to provide early warning of a potential situation if circumstances allow.

## 6.2 Termination of Potential Critical Contingency

If the TSO believes the event has been resolved or no longer poses a risk of becoming a critical contingency, it must:

- Inform the CCO by phone within 30 minutes
- Confirm in writing within 60 minutes

The CCO will then:

- Issue a termination notice to the TSO
- Notify stakeholders listed in the CCO Information Guide
- Publish the notice on the CCO website

A potential contingency automatically ends if the CCO declares a critical contingency.

In fast-developing situations, the CCO may declare a critical contingency without first issuing a potential contingency notice

## 7.0 DECLARATION OF CRITICAL CONTINGENCY

The CCO will declare a critical contingency if:

- A breach of one or more CCMP thresholds has occurred, or
- A breach is considered unavoidable, and a declaration is needed to meet the purpose of the Regulations.

### **How the determination is made:**

- The CCO assumes pressure decline will continue at a constant rate unless reliable information suggests otherwise.
- As soon as possible after declaring a contingency, the CCO will decide whether it is regional or non-regional (per Regulation 45).

The **Critical Contingency Declaration Notice** will:

- Confirm the critical contingency declaration time and date.
- Identify the areas of the transmission system that are affected.
- State that CCO/TSO directions must be followed
- Indicate if it is a Regional Critical Contingency (Regulation 52A)

### **Communication Process:**

The CCO will issue the declaration notice to the TSO and stakeholders listed in the CCO Information Guide. The notice will also be published on the CCO website.

The TSO must then issue its own notice via OATIS to the parties defined in the CCMP within 30 minutes of receiving the CCO's notice.

## 8.0 DURING A CRITICAL CONTINGENCY

### 8.1 Directions to Curtail Demand

During a critical contingency where demand curtailment has also occurred, gas use is reduced in order of the curtailment bands set out in Schedules 2 and 3 of the Regulations.

Band 0 is curtailed first, Band 7 last. The CCO may also curtail subsets of demand within a band (Regulation 53(2)).

There are special rules for Bands 1 and 2 electricity generation: Before curtailing these bands, the CCO will consult the Electricity System Operator (ESO) to:

- Assess the impact on electricity supply security
- Decide if certain electricity-designated consumers may continue using gas (Regulation 46D(1))
- Determine whether to curtail only part of gas-fired generation to maintain voltage support and electricity system stability

The curtailment notice will clearly state whether any electricity-designated consumers are allowed to keep using gas.

#### Process:

- The CCO and TSO consult on the required curtailment and where practicable, a draft notice is provided to the TSO for comment
- The CCO issues a curtailment notice to the TSO
- If the TSO believes the direction conflicts with the objectives in Schedule 2, it must advise the CCO.
- Once the TSO receives the notice, it must notify all parties defined in the CCMP within 30 minutes.
- The CCO will also send the notice to stakeholders listed in the Information Guide and publish it on the CCO website.

### 8.2 Directions to Revise Curtailment of Demand

During a critical contingency, the CCO may issue a revised curtailment notice to the TSO.

The CCO will consider feedback from the TSO before issuing the revision. If the TSO believes the revision conflicts with the objectives in Schedule 2, it must advise the CCO.

Once the TSO receives the revised notice, it must notify all CCMP parties within 30 minutes.

#### Important:

- The revised notice replaces all previous curtailment notices.
- It specifies the full set of demand that must now be curtailed.

The CCO will send the revised notice to stakeholders listed in the Information Guide and publish it on the CCO website.

### **8.3 CCO Direction to Retailers**

If curtailing demand in Bands 0–6 is not enough to stabilise system pressure, the CCO will instruct retailers to begin public appeals via media to request consumers that have not been curtailed to conserve their use of gas.

Retailers must follow their Retailer Curtailment Plans (Regulation 53(1)(db)).

The CCO will:

- Issue a formal notice to retailers
- Send a copy to the TSO and stakeholders listed in the Information Guide
- Publish the notice on the CCO website

### **8.4 Directions to Restore Curtailed Demand**

Once transmission system pressure and linepack have stabilised, the CCO will issue a demand restoration notice to the TSO.

Demand is normally restored in reverse order of curtailment (last curtailed = first restored). Exceptions may apply if:

- Civil Defence Emergency directions take precedence
- TSO advice or other factors suggest a different order would better meet the objectives of the Regulations

#### **Restoration priorities will consider:**

- Minimising risks to transmission and distribution systems and interconnected parties
- Minimising risks to public health and the environment
- Restoring supply only if it can be maintained reliably

The demand restoration notice replaces all previous restoration notices. It covers all demand already approved for restoration plus any new demand that can now be restored.

Before issuing the notice, the CCO will consult with the TSO. If the TSO believes the plan conflicts with the objectives in Schedule 2, it must advise the CCO.

Once the TSO receives the notice, it must notify all CCMP parties.

The CCO will also send the notice to stakeholders listed in the Information Guide and publish it on the CCO website.

## 8.5 Retailer & Large Consumer Compliance Updates

Retailers and Large Consumers must send regular curtailment compliance updates to the TSO at the intervals stated in the demand curtailment notices.

To streamline this:

- The TSO provides separate templates for Retailers and Large Consumers
- Each group should send updates to the email addresses listed on the templates
- All parties should be familiar with the templates and their instructions
- The TSO will provide updates to the CCO in accordance with timings set out in the Communications Protocol

Timely and accurate updates are critical. The CCO uses this data—alongside TSO analysis—to assess system stability and guide decisions.

## 8.6 Publishing of Information by CCO

The CCO must keep stakeholders regularly informed about the status and expected duration of a critical contingency (Regulation 53(g)).

**Status update notices** will be published on the CCO website. These:

- Provide supplementary information and forecasts
- Do not contain directions or declarations
- Are based on the best information available at the time, and may change as the situation evolves

### **Daily updates (after Band 3 curtailment):**

If consumers in Band 3 and higher are curtailed, the CCO will publish updated statements three times each day (by 9 am, 1 pm, and 5 pm) while the contingency remains in force. These statements will include:

- The time the contingency was declared
- The cause (e.g. production station failure, pipeline failure, or other event)
- Actions being taken to stabilise the system (curtailment, alternative supplies, etc.)
- Current estimates of which curtailment bands are affected, with examples of consumer types
- The geographic areas impacted
- Any available estimate of repair times

### **Additional information may include:**

- Timing of revised curtailments and whether they increase or decrease demand reductions

- Likely repair completion times, expected restoration start times, and when curtailed bands may be restored
- A statement if no repair or restoration estimates are available
- Any other information that would help inform the market

## 8.7 Continuing Critical Contingency

If a critical contingency has not been terminated within three days from the date it was declared, the CCO will give notice of the situation to the following parties:

- (a) The Director of Civil Defence Emergency Management
- (b) The Industry Body (Gas Industry Company)
- (c) The Minister of Energy
- (d) The Secretary (Chief Executive, Ministry of Business, Innovation & Employment).

The CCO will provide any information on the critical contingency to these parties as required.

## 8.8 Non-compliance with curtailment or restoration directives

If the TSO learns of any non-compliance with curtailment, revised curtailment, or restoration directives during or after a contingency, it must inform the CCO in writing.

If the CCO becomes aware of non-compliance by a consumer installation (including designated consumers), it will:

1. Notify the responsible retailer, or the TSO if it involves a large consumer. They must contact the consumer and direct them to comply.
2. Notify the Gas Industry Company (GIC), which may seek an interim injunction under Regulation 39A of the Gas Governance (Compliance) Regulations 2008.

## 8.9 Other CCO activities

During a critical contingency, the CCO will also:

- Monitor transmission system pressure and linepack using data from the TSO
- Explore options to increase upstream gas production or draw on gas storage
- Assess whether reconfiguring the transmission system could help stabilise linepack and pressures. The CCO will consult with the TSO and if it is feasible, may direct the TSO to carry out the reconfiguration

## **9.0 TERMINATION OF A CRITICAL CONTINGENCY**

The CCO will declare a critical contingency terminated once the transmission system can supply gas to all consumers at the same level as before the event. This decision may be made even if some curtailed consumers have not yet had their supply restored.

The CCO will issue a termination notice to the TSO.

The TSO must notify all parties defined in the CCMP once it receives the termination notice.

The CCO will also advise stakeholders listed in the CCO Information Guide and publish the termination notice on the CCO website

## 10.0 PUBLISHING OF INFORMATION BY ASSET OWNER

In accordance with regulation 54A, every asset owner whose asset has become damaged or has failed and caused or contributed to a critical contingency is required to ensure that information is published and updated regularly so that interested parties are informed about a critical contingency.

The asset owner must, after the curtailment of consumer installations in curtailment band 3, prepare a statement containing the following information:

- (a) a description of the damaged or failed asset and the cause of the damage or failure
- (b) what actions are being taken by the asset owner to effect repairs
- (c) the likely duration of each step of the repair process, including any testing and certification required before the asset can be restored to service
- (d) the asset owner's best estimate of the time at which the asset will be returned to service
- (e) if the asset will be temporarily restored to a reduced level of service, information about the reduced capacity and likely duration of reduced capacity
- (f) an assessment of the likely accuracy of the times provided in paragraphs (c), (d), and (e) as well as a description of the identified risk factors and the likely effects that each would be expected to have on those times.

## 11.0 APPENDICES

Appendix 1: Summary of CCO-TSO Communications Protocol

## APPENDIX 1 - SUMMARY OF CCO-TSO COMMUNICATIONS PROTOCOL

The following table is provided for information purposes and summarises the provision of information and communications which are set out in more detail in the CCO-TSO Communications Protocol (CCO-021)

INFORMATION	INFORMATION TO BE PROVIDED	FREQUENCY & TIMEFRAME
Transmission System Status Report	Information to enable CCO to review the transmission system availability status, security of supply risk profiles, scheduled maintenance, configuration and outage plans.	Report (CCO-050) to CCO during final week of each month plus ongoing updates as required.
General System Queries and Updates During Normal Operations	Information on historic/current/projected transmission system conditions to support calibration of CCO Load Model.	Verbal, SMS or written response as required.
SCADA Data File	Transmission system SCADA data download during normal, abnormal or event conditions.	Data files provided in accordance with the agreed SCADA Data Transfer Functional Specification.
Transmission System Changes	Notification of any planned changes to the transmission system that will affect the performance or capability of the system.	As soon as practicable, as and when required
Event Notification	Initial verbal notification/alert of any event within the transmission system that has the potential to create a critical contingency.	Alert Duty CCO within 15 minutes of event arising.
	Written Security of Supply Alert confirming details of the parts of the transmission system affected, predictions on when the event will likely be resolved, and actions being taken to resolve the situation.	Email Security of Supply Alert (CCO-053) as soon as possible but no later than 30 minutes of event arising
Periodic Updates During Events	Updates on the status of the event and specific notification of any material changes.	Verbal notification of any material changes within 15 minutes and email update within 30 minutes of the event.

INFORMATION	INFORMATION TO BE PROVIDED	FREQUENCY & TIMEFRAME
		Email SoS Update (CCO-053) at periods specified by CCO at the time of the event.
Published Information	Information to enable CCO to prepare Public Information Report as specified in Schedule 5 following curtailment of consumers in band 3.	Email Public Information Report (CCO-052) no later than 8am, 12pm and 4pm daily.
Large Consumer Compliance Updates	Copies of Large Consumer Compliance Updates provided to TSO	Forward Compliance updates by email within 15 minutes of receipt.
Retailer Compliance Updates	Consolidated summary of Retailer Compliance Updates provided to TSO	Email Summary of Compliance updates within 30 minutes after the time specified to Retailers
Event Resolution	Verbal notification that the event has been resolved.	Telephone within 30 minutes of event being resolved.
	Security of Supply Update confirming details of the event resolution	Email SoS Update (CCO-053) within 60 minutes of event being resolved.
* SCADA Real Time Remote Access	Information to enable CCO to monitor in real-time the current transmission system conditions and rate of change.	Continuous

\* It is noted that SCADA Real Time Remote Access is not yet available and is subject to further assessment however it is included as a requirement.