

# CRITICAL CONTINGENCY OPERATOR



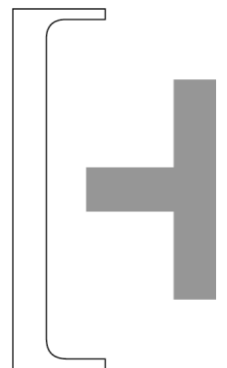
## ANNUAL INDUSTRY EXERCISE 2025

### “Exercise Tukurua”

Test of the First Gas Ltd Critical Contingency Management Plan

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

June 2025



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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 CCM 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 Tukurua**” was carried out on 21 May 2025. 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 Tukurua** 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 Tukurua 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. Due to the urgency of the scenario, the CCO issued an oral notice of the critical contingency declaration.

The CCO concludes that Firstgas and Retailers have established applicable processes and procedures for responding to critical contingency events in accordance with the regulations. However, as such events are infrequent and not part of routine operations, this exercise demonstrates that the effectiveness of the response is heavily dependent on the availability, experience and preparedness of the personnel involved at the time. There are concerns that processes for declaring a critical contingency, issuing curtailment instructions and curtailing consumers may not occur in the timeframes required by the current thresholds to ensure the purpose of the regulations are met.

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, but the application of key processes referred to in it could be more effective.	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), but they rely on experienced personnel to ensure timely and accurate execution during an actual event.
Does the CCMP contain the contact details required by regulation 25 and are they current?	Yes – for the most part	There are new shippers not listed in the CCMP. This is because in previous discussions with the CCO and GIC, the parties agreed that reference to OATIS contact management in the CCMP is sufficient until a wider CCMP update is required.
Is the list of emergency contact details maintained by Retailers in accordance with regulation 43 current?	Yes – for the most part.	Feedback from Retailers provides some assurance that appropriate processes and systems are in place for managing consumer contact details. However, the speed with which Retailers would have contacted all affected consumers varied widely between Retailers. This variation raises concerns that the timeliness of curtailment execution by Retailers may not be sufficient to support a successful outcome in a real critical contingency event.

Consequently, the CCO considers that while the existing framework is appropriate on paper, there is scope to improve how the processes and procedures are applied in practice.

The CCO recommends that:

- Firstgas reviews the current processes with a view to simplifying them and increase the experience of those staff who might be required to implement them. Appropriate changes should be reflected in the next version of the CCMP due in March 2026.
- Retailers 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 critical contingency pressure thresholds.

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 Critical Contingency Management 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 5 March 2025. 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 200mm Firstgas North Pipeline at the junction of Glenview Road and Waikumete Road in Glen Eden, Auckland. The damage, caused by directional drilling equipment, resulted in a large gas leak and the closure of main line valves at Waikumete and Links Road, isolating the gas supply north of Glen Eden.

At 9:15am, the TSO Control Room advised that the threshold at the Waikumete Delivery Point had been breached, prompting the CCO to determine that a critical contingency had occurred.

Due to the urgency of the situation, the CCO advised that an oral critical contingency declaration would be made to expedite the process and enable prompt curtailment. A regional critical contingency was declared, affecting all gas gates and consumers downstream of Waikumete, with curtailment applied down to Band 6. 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 was 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	2.0	<i>Firstgas reviews the current processes with a view to simplifying them and increase the experience of those staff who might be required to implement them. Appropriate changes should be reflected in the next CCMP due in March 2026.</i>	<i>Firstgas</i>
2	2.0	<i>Retailers review their process for contacting consumers affected by a critical contingency to ensure that all consumers could be contacted within the time allowed under the critical contingency pressure thresholds.</i>	<i>Retailers</i>
3	6.1	<i>Firstgas to complete the update of Firstgas Document, 09456 Critical Contingency Pipeline Thresholds Overview to align with changes to Schedule 1 of the CCM regulations and provide a copy of the approved document to the CCO.</i>	<i>Firstgas</i>
4	6.4	<i>Firstgas hold periodic short exercises which focus on the initial communications and responses to a critical contingency event i.e. during the first 30-45 mins. Firstgas has suggested that the CCO also be involved to bring authenticity to the training.</i>	<i>Firstgas &amp; CCO</i>
5	6.7	<i>Firstgas and the CCO work to accelerate the process of preparing and publishing declaration and demand curtailment notices.</i>	<i>Firstgas &amp; CCO</i>
6	6.7	<i>Firstgas to revisit and where necessary improve, the now automated Security of Supply alert system to help ensure the timely and accurate supply of information to the CCO and internal stakeholders; and work with Control Room Operators to ensure that the automated Security of Supply templates are populated accurately and consistently.</i>	<i>Firstgas</i>
7	7.1	<i>CCO and Firstgas to consider options to accelerate the process for applying urgent oral notification for a critical contingency declaration and initial demand curtailment.</i>	<i>Firstgas &amp; CCO</i>
8	8.5	<i>Firstgas to continue to work with Retailers and Large Consumers to ensure that they understand curtailment compliance processes and expectations.</i>	<i>Firstgas</i>
9	8.5	<i>GIC to explore the reasons for the difference between registry numbers of ICPs and ICP numbers provided by Retailers as part of curtailment compliance.</i>	<i>GIC</i>
10	8.5	<i>Firstgas to modify the Retailer Curtailment Compliance Template to state "Number of ICP's Now Requested to Curtail".</i>	<i>Firstgas</i>
11	8.6	<i>Update the Domestic Gas Retailers Communications Protocol to ensure all relevant contacts are included.</i>	<i>CCO</i>
12	8.6	<i>Align the contacts listed in the Domestic Gas Retailers Communications Protocol with its Contacts Database</i>	<i>CCO</i>
13	8.6	<i>GIC to continue to work with Retailers communications personnel to increase understanding of the Domestic Gas Retailers Communications Protocol and how it should be applied in practice.</i>	<i>GIC</i>

## 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 19 May 2022, 2 days prior to the actual exercise date. All items were audited with the Senior Commercial Advisor Transmission, Lead 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**

Firstgas Document, 09456 Critical Contingency Pipeline Thresholds Overview describes the rationale for setting the critical contingency pressure thresholds required under the CCM Regulations current pressure thresholds. This document was due for annual review in January 2025. It required updating to reflect removal of the Taupo DP and Broadlands DP pressure thresholds associated with the urgent regulations change in 2024 as well as the GIC's approval of the proposed amendments to Schedule 1 of the CCM Regulations.

##### ***Observation:***

- *Some updates to the document have been made over the last couple of months but it still requires some engineering additions (e.g. review of regulator pressure information) to get the document completed and approved.*

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

- *Firstgas to complete the update of Firstgas Document, 09456 Critical Contingency Pipeline Thresholds Overview to align with changes to Schedule 1 of the CCM regulations and provide a copy of the approved document to the CCO.*

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

The CCO confirmed that the threshold information was being received reliably. It was also confirmed that the data being sent to the CCO had the same SCADA reference as that being viewed by Firstgas by comparing the CCO model against the Control Room screen.

##### ***Observation:***

- *A new Firstgas SCADA system, which will allow CCO real-time access to view the pressure thresholds has been delayed from Q3 2024 to Q4 2025.*

### **Scada System Alarms**

The pressure threshold alarm settings were checked on the SCADA system and found to be correct as detailed in the following table:

Measurement Point	Threshold		SCADA As Found		SCADA As Left	
	Pmin	Hours	Low	Critical Low	Low	Critical Low
Rotowaro	30.0	3	7	3	As found	As found
Westfield	37.5	6	8	6	As found	As found
Waitangirua	37.0	10	12	10	As found	As found
Hastings	30.0	5	7	5	As found	As found
KGTP	35	3	4	3	As found	As found
Gisborne	30.0	5	7	5	As found	As found
Reporoa	30.0	5	7	5	As found	As found
Tauranga	30.0	5	7	5	As found	As found
Whakatane	30.0	5	7	5	As found	As found
Cambridge	30.0	5	7	5	As found	As found
Whangarei	27.5	5	7	5	As found	As found
Other (sample checked)	30	5	7	7	As found	As found

#### **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.

The latest version of CCMP (v14) was approved in March 2024.

#### **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.

The CCMP states that the emergency response capability is tested and evaluated by either a trial exercise or training exercise on a regular basis.

Firstgas continues to run monthly emergency response exercises. The most recent was a Clarus wide exercise (initially focusing on Firstlight electricity distribution) held within the last two weeks.



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

The operational contact details for these groups are contained in OATIS. OATIS stores contact details by contact group and party. Members of the target audience who are regular users of OATIS (e.g. Shippers, Maui Pipeline Interconnected Parties etc.) have separate OATIS contact groups from those who do not use OATIS regularly (e.g. gas distributors, Retailers etc.). This enables Firstgas to send notifications (via SMS and e-mail) to each relevant OATIS contact group when necessary. Parties that have access to OATIS have the responsibility for ensuring that their contact details in OATIS are current. Reminders for these parties to check and confirm, or advise of changes to, their contact details in OATIS are sent by email monthly. For parties that do not have access to OATIS, and any changes not caught by the monthly check by parties with OATIS access, Firstgas will check/update all contact details every six months or at other times considered appropriate by Firstgas.

Approximately 6-weeks prior to the test exercise, Firstgas carried out one of the biannual OATIS contact audits referred to above. This process involves downloading all the contacts from OATIS held for all stakeholders and sending them to individual stakeholders / companies for review and update as required.

Parties that are slow to respond are followed up. Firstgas confirmed that at least one contact for each relevant organisation is currently held in OATIS. Firstgas has provided the CCO with an example of:

- the OATIS contacts audit email and attachments sent to stakeholders;
- where Firstgas were requested to make changes to OATIS contacts e.g. from an OATIS user who can't do it themselves.

Firstgas has published a document titled OATIS Contacts Management – General Overview to explain how contact details can be kept up to date.

Firstgas provided the CCO with a copy of the latest OATIS contact reports that can be generated daily. The CCO reviewed these reports and noted that there are contact details for new shippers not listed in the CCMP.

#### **Observation:**

- *There are new shippers not listed in the CCMP. This is because in previous discussions with the CCO and GIC, the parties agreed that reference to OATIS contact management in the CCMP is sufficient until a wider CCMP update is required.*

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

Section 5.4 and 5.5 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.
- in a PDF format.
- using the proforma templates set out in the CCO Communications Plan.
- 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.

**Observation:**

- *In this exercise, all Notices issued by Firstgas met the criteria outlined in the CCMP.*

**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)]**

Firstgas nominates the Clarus Duty Manager, or such other persons nominated and authorised by Firstgas from time to time to issue directions on behalf of Firstgas. Other such persons may include the Systems Operations Manager, Incident Controller, Emergency Management Team Leader and/or Critical Contingency Liaison (in the Emergency Management Team), Firstgas Control Room Operator, Duty Scheduler, Senior Management and communications personnel.

Appendix 6 of the Firstgas CCMP contains contact details of the suitably qualified Firstgas employees responsible for giving communications and directions under the CCMP and communications plans.

**Observations:**

- *Firstgas used the exercise as an opportunity for less experienced personnel to perform the primary role responsible for issuing communications and directions under the CCMP. This role, within the Emergency Management Team, is titled Critical Contingency Liaison. Firstgas has documented a detailed process to guide the role during a critical contingency. However, effective and timely execution of the role requires the person performing it to be both experienced and familiar with the procedures. There were some delays and errors during the exercise due to the people in the roles not being fully familiar with the process and documentation.*

**Recommendation:**

- *Firstgas hold periodic short exercises which focus on the initial communications and responses to a critical contingency event i.e. during first ~30-45 mins. Firstgas has suggested that the CCO also be involved to bring authenticity to the training*

**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 11 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 8 of the CCMP contains detailed 12-step and 22-step processes for contingency imbalance calculation methodologies consistent with the pipeline operating codes (MPOC and GTC respectively). This section also describes how Firstgas will properly integrate the contingency imbalance regime prescribed in the CCM 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, which in turn refers to the Communications 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 included in Appendix 11 of the CCO's Communications Plan.

**Observations:**

- *The Firstgas Emergency Management Team (EMT) mobilised quickly. There was an appropriate level of focus on the public safety and pipeline repair requirements for the scenario. However, there was a lack of urgency associated with getting information relevant to declaration and demand curtailment.*
- *It took almost an hour from the 1<sup>st</sup> exercise inject being issued to publishing the declaration notice. The Firstgas personnel were not familiar with the oral declaration process and the wrong template was used initially.*

- *It took another hour to publish a demand curtailment notice. With this type of event, the speed of issuing demand curtailment instructions is critical to the management of the outage.*
- *While Firstgas met the timeframes for communications and information flows documented in the Communications Protocol, there was a lack of urgency to get the declaration and demand curtailment notices issued.*
- *The Firstgas Control Room's automated Security of Supply notice system is an improvement over the previous manual email process. However, there is room to improve the application of the system. For example, the initial notice lacked reference to the pressure threshold breach, omitted the most relevant pressure threshold point, and provided none of the event information that would have better informed the CCO. A CCO relying on this for information would not have appreciated that critical contingency conditions existed. The quality of the notices improved as the exercise progressed after feedback from the CCO.*
- *The Asset Owner Statement preparation process was initially confused with the preparation of a Firstgas Media Statement. These were corrected during the exercise, indicating the process was ultimately effective once personnel better understood the process.*

**Recommendations:**

- *Firstgas and the CCO work to accelerate the process of preparing and publishing declaration and demand curtailment notices.*
- *Firstgas to revisit and where necessary improve the now automated Security of Supply alert system to help ensure the timely and accurate supply of information to the CCO and internal stakeholders; and work with Control Room Operators to ensure that the automated Security of Supply templates are populated accurately and consistently.*

**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 CCMP addresses pre-critical contingency situations and sets out the conditions under which Firstgas will notify the CCO of an 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.

**Observation:**

- *Firstgas met the regulatory requirement to alert the CCO within 15 minutes of an event within the transmission system that has the potential to 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:

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

Firstgas submitted the report to the CCO on 5 June 2025. 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 six (6) actions to improve the efficiency of processes and procedures to support application of the CCMP.
- did not recommend any amendments to the CCMP
- did not provide any other information that Firstgas considered appropriate.

The six actions identified by Firstgas have been incorporated in Section 6 of this report.

#### **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), but they rely on experienced personnel to ensure timely and accurate execution during an actual event.

Section 5 of this report provides recommendations which would enhance the efficiency of the processes and procedures that support the current framework.

In addition, the CCO recommends that Firstgas reviews the current processes with a view to simplifying them and increase the experience of those staff who might be required to implement them. Appropriate changes should be reflected in the next version of the CCMP due in March 2026.

## 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 09:01. Firstgas subsequently alerted the Duty CCO by SMS at 09:05 and requested they contact the Control Room.

The Duty CCO responded to the SMS at 09:05 and was advised that the SCADA system was showing that Waikumete Main Line Valve had closed and the Waikumete Delivery Point was showing a low-pressure alarm. The Waikumete pressure threshold had been breached. The fire brigade was on-site in Glen Eden and had advised there was a large gas leak.

The CCO advised Firstgas that the conditions indicated that a Critical Contingency had occurred. Due to the urgency of the situation, the CCO determined that an oral declaration will be issued to Firstgas to expedite the declaration process and enable prompt curtailment.

The CCO requested that a Security of Supply alert be sent and requested they schedule an urgent meeting between the CCO and Firstgas Duty Manager and Duty Scheduler as soon as possible to populate a critical contingency declaration template by telephone.

The CCO issued oral notice of the critical contingency declaration at 09:33. This was 28 minutes after being notified of the event.

#### **Observations:**

- *This exercise was the first time the current process for issuing urgent notices orally had been practiced.*
- *The Firstgas personnel involved were not familiar with the process and the wrong template was used initially which added delays to the process.*
- *An on-line meeting to populate the notice template would have been more effective.*
- *Took 58 minutes from Inject being issued to the TSO sending out the oral declaration notice.*

#### **Recommendations:**

- *CCO and Firstgas to consider options to accelerate the process for applying urgent oral notification for a critical contingency declaration and initial demand curtailment.*

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

The CCO determined that the isolation of the Firstgas North 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 a 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:

10:04am Confirmation of Critical Contingency Declaration Notice given orally to TSO CC-089  
10:53am Demand Curtailment Notice CC-090  
11:30am Retailers to Implement Media Appeals Notice CC-091  
1.00pm Status Update Notice CC-092

#### **Observations:**

- *The CCO omitted to copy the Retailers to Implement Media Appeals Notice to Firstgas in error.*
- *The time of the Retailers to Implement Media Appeals Notice was incorrectly shown as 11:30pm instead of 11:30am*
- *One stakeholder provided feedback that the CCO’s description of the “geographic area or areas affected” on the Retailers to Implement Media Appeals and Status Update Notices was not as clear as it could have been.*
- *Overall, the notices were delivered to the appropriate parties, generally contained accurate information (with the above exceptions), and were issued within the required regulatory timeframes. However, there is room to improve the speed of this process as outlined in Section 6 of this report.*

#### **Recommendations**

- *Recommended actions to address time delays associated with the process for issuing notices have been made in Section 6 of this report.*

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

Once the pipeline was isolated and the initial time to repair was established as being at least 72 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.

#### **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.*

### 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 two-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 11:17, the CCO requested that Firstgas provide an Asset Owner Statement that would inform the CCO's Status Update Notice. Firstgas provided the CCO with an Asset Owner Statement in accordance with Schedule 5 of the regulations at 12:19.

**Observation:**

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

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

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

**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 05 March. 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 30 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 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 large 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 but 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?	0	640	0	1909	20
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	0	66	0	143	20
For the consumers contacted to verify contact details, what percentage were incorrect?	0%	35%	0%	25%	23%
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?	At a maximum, 5 mins per call. 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.				

### Genesis Energy

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	68	1395	6	3401	80
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	68	324	6	403	80
For the consumers contacted to verify contact details, what percentage were incorrect?	5%	10%	0%	15%	5%
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?	30 Mins	4 Hours	10 Mins	10 hours	35 Mins

## Mercury (inc Trustpower)

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	0	115	0	534	8
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	N/A	All	N/A	All	All
For the consumers contacted to verify contact details, what percentage were incorrect?	N/A	1%*	N/A	1%*	1%*
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?	N/A	3 hours**	N/A	14 hours**	15 minutes**
**This is based on taking approx. 5 minutes to call each customer with 3 staff members making the calls. However, in an actual event this may vary depending on resource available to make calls (both plus and minus).					

## Nova

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	182	3,293	7	4,437	145
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	We contacted all our natural gas customers with our regular CCO contact detail update/ check emails/letters in December 2023.				
For the consumers contacted to verify contact details, what percentage were incorrect?	In our December 2023 CCO communications, around 4.5% of our business natural gas customers contact details required updates.				
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?	We estimate we would need around 15 minutes to get the data ready and 10 minutes to send out the notifications (SMS/Email). Note: This estimate may vary depending on the time of day and the actual day (i.e., weekday versus weekend/public holiday).				

## Megatel

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	0	68	0	101	0
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	We simulated contact for 100% of our affected Band 4 and Band 6 customers during this exercise. No contact was made with other bands.				
For the consumers contacted to verify contact details, what percentage were incorrect?	All contact details were confirmed to be current in our system. No updates were required for the sampled customers.				
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>Band 4: Within 30 mins via email/SMS</li> <li>Band 6: Within 1 hour via email/SMS</li> </ul>				

## Pulse

Curtailment Bands:	3	4	5	6	7
How many consumers did you have in each of the affected bands?	0	1	0	2	NA
During the exercise, how many consumers in each curtailment band did you contact?	0	0	0	1	NA
Of those consumers contacted, how many were the correct contact details?	0	0	0	1	NA
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	1 hr	0	1hr	NA

## Greymouth

Consumer Curtailment	Curtailment Band				
	3	4	5	6	7
How many consumers do you have in each curtailment band?	48	70	0	5	NA
Prior to and/or during the exercise, how many consumers in each curtailment band did you contact to verify their contact details?	100%	100%	NA	100%	NA
For the consumers contacted to verify contact details, what percentage were incorrect?	Prevailing details correct from our perspective, with minimal updates required from pre-exercise review.				
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. A similar context applies to contacting consumers.				

**Observations:**

- *There was a varied level of testing prior to and during the exercise among Retailers. Others relied on their business-as-usual processes for reassurance about the accuracy of their contacts.*
- *It was noticeable that Retailers had a broad range of capability with regard to their mechanisms for contacting consumers and their expectations about how long this may take.*
- *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:**

- *Retailers review their process for contacting consumers affected by a critical contingency 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 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 reported that the quality, quantity and timeliness of curtailment compliance updates by Retailers did vary throughout the exercise. For example:*
  - *old templates were used and included energy figures rather than numbers of ICP's*
  - *some updates were provided after the requested deadline*
  - *some updates recorded unnecessary curtailments*
  - *some updates were sent directly to the CCO rather than to the requested TSO emails.*
  - *There was a discrepancy between the Gas Registry number of ICP's and those provided by Retailers*
- *One Retailer provided feedback that the Firstgas Retailer Curtailment Compliance Template asks for "Number of ICP's Now Curtailed". In practice Retailers will not necessarily know this unless a consumer has smart metering.*

**Recommendations:**

- *Firstgas to continue to work with Retailers and Large Consumers to ensure that they understand curtailment compliance processes and expectations.*
- *GIC to explore the reasons for the difference between registry numbers of ICPs and ICP numbers provided by Retailers as part of curtailment compliance.*
- *Firstgas to modify the Retailer Curtailment Compliance Template to state “Number of ICP’s Now Requested to Curtail”.*

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

The following retailers are signatories to the Domestic Gas Retailers Communications Protocol: Trustpower, Contact Energy, Genesis Energy, Mercury, 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. Mercury is the Lead Retailer for 2025.

**Observations:**

- *Processes associated with the Retailer appeals to domestic gas users were perhaps not as well understood and implemented as they could have been. For example:*
  - *Mercury initially appeared unsure of how to follow the Protocol.*
  - *Mercury’s first draft statement did not use the Protocol Template (Appendix B) and contained several errors to which the CCO provided feedback.*
  - *Some relevant industry media contacts are not listed in the Protocol.*
  - *Some media contacts listed in the Protocol are not in the CCO Contacts Database.*
  - *Following consultation between the parties, the final media appeal statement was significantly improved. A copy of the statement can be found in Appendix E*
- *Nova Energy prepared a media appeal for its consumers in the affected area.*

**Recommendation:**

- *CCO to facilitate and update the Domestic Gas Retailers Communications Protocol to ensure all relevant contacts are included.*
- *CCO to align the contacts listed in the Domestic Gas Retailers Communications Protocol with its Contacts Database*
- *GIC to continue to work with Retailers communications personnel to increase understanding of the Domestic Gas Retailers Communications Protocol and how it should be applied in practice.*

**8.7. CCO’s Overall Assessment of the Retailers Response**

Feedback from Retailers provides some assurance that appropriate processes and systems are in place for managing consumer contact details. However, the speed with which Retailers would have contacted all affected consumers varied widely between Retailers. This variation raises concerns that the timeliness of curtailment execution by Retailers may not be sufficient to support a successful outcome in a real critical contingency event.

The CCO recommends that Retailers 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.

#### **Observations:**

- *The Asset Owner Statement preparation process was initially confused with the preparation of a Firstgas Media Statement. These were corrected during the exercise, indicating the process was ultimately effective once personnel better understood the process.*
- *Firstgas provided an Asset Owner Statement to the CCO at 12:19. This statement contained the information specified in Schedule 5(2) of the Regulations. The statement was subsequently published on OATIS at 13:15. A copy of the statement can be found in Appendix F*

## Appendix A – Exercise Injects

### Inject #1 for TSO - 9:01am

#### Exercise Tukurua

For the purposes of the exercise, the Control Room is to assume that the SCADA system is displaying the following Alarm indications:

- the Waikumete MLV has closed.
- a low inlet pressure alarm at Waikumete Delivery Point.

Critical Contingency thresholds:

- Whangarei Threshold 12 Hours to 27.5bar
- Waikumete DP Threshold 3 Hours to 30 Bar

The Control Room is also to assume that:

- they have received a call from the Glen Eden Fire Brigade who have been called to Glenview Road at the junction with Waikumete Road in Glen Eden, Auckland.
- there is a large gas escape in the road (no ignition or explosion)
- a sign on a nearby lamp post says there is a high-pressure gas main in the vicinity
- a contractor is on site; they were using directional drilling equipment to install a fibre connection.
- Glenview Road has been closed, and traffic is being diverted.

Further advice on Transmission system conditions will be provided by 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 Tukurua



### **Inject #2 for TSO - 10:08am**

#### **Exercise Tukurua**

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

- Firstgas technician has arrived on site and confirms the 200mm Firstgas North Pipeline in Glenview Road, Glen Eden has been punctured which has been caused by directional drilling equipment.
- It is determined that the Waikumete MLV is closed, and the Links Road MLV needs to be closed to make the site safe.

TSO is to assume that the CCO is not aware of the system conditions and will only act on information provided by the TSO. Any queries relating to this inject should be referred to the CCO Exercise Controller.

Further advice on Transmission system conditions will be provided by 11:00am.

#### **Exercise Tukurua**

### **Inject #3 for TSO - 11:09am**

#### **Exercise Tukurua**

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

- The estimated time to repair is at least 72 hours since damage occurred depending on severity of damage which will be assessed once excavation of the site has been completed.

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 Tukurua**

### **Inject #4 for TSO - 1:47pm**

#### **Exercise Tukurua**

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

- TSO engineering and operations teams have commenced the remediation plan. The repair team have arrived on site and materials have begun to arrive. Excavation has commenced.
- Time to repair estimate continues to be at least 72 hours from when repairs commence.
- Inlet Pressure at all gas gates from Waikumete DP north that are on SCADA continue to drop, but at a slower rate as load is starting to reduce

Further advice on Transmission system conditions will be provided by 3pm.

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 Tukurua**

## **Inject #5 for all Participants – 3:03pm**

### **Exercise Tukurua**

There will be no further notices published for the exercise. Retailers should continue to submit their last update.

For this scenario, which would span more than 24 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 email can be sent to [cco@cco.org.nz](mailto:cco@cco.org.nz)

### **Exercise Tukurua**

## Appendix B – Exercise Event Log

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

Event:	Exercise Tukurua		Date:	15/05/2024
Time	From	To	Details	Observation
08:30	Exercise Control		CCO website Current Events page updated to advise Exercise Tukurua has commenced.	
08:50	Exercise Control	CCO Email Contacts	Email to advise Exercise Tukurua has commenced	
08:57	Exercise Control	CCO SMS Contacts	SMS to advise Exercise Tukurua has commenced.	
09:00	Exercise Control	BBK Control Room	Inject #1 issued by email and followed up with phone call.	
09:00	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 79009 "EXERCISE HANGURU - CCO Test Exercise for Wednesday 21 May 2025 -" - Action Required.	Incorrect Exercise Name used.
09:02	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 79010 " EXERCISE TUKURUA – CCO Test Exercise for Wednesday 21 May 2025 -" - Action Required.	
09:05	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 79011 " EXERCISE TUKURUA – CCO Test Exercise for Wednesday 21 May 2025 -" - Action Required.	
09: 05	BBK Control Room	CCO	Gas Controller sends SMS to CCO requesting Duty CCO to contact Control Room.	
09:05	CCO	BBK Control Room	CCO contacts Control Room. CCO advised that SCADA shows that Waikumete MLV has closed and the Waikumete DP is in low pressure alarm. The fire brigade has advised there is a large gas leak. <b>CCO advises the TSO that the conditions indicate a Critical Contingency has occurred. The CCO advises that an oral declaration will be made.</b> CCO requests a Security of Supply alert to be sent and requests they prepare an urgent meeting to populate an oral declaration template as soon as possible.	

Time	From	To	Details	Observation
09:19	BBK Control Room	CCO	Security of Supply Alert #1 issued. 15 minutes after inject #1 provided.  Next update scheduled for 10:00.	Exercise Tukurua not used in title Whangarei used as threshold point – not Waikumete DP System conditions described as average. Breach of threshold not referenced. Little supporting information – e.g. gas leak and fire brigade attendance.
09:31	TSO Duty Manager	CCO	Meeting to populate oral declaration template via telephone. Declaration time set at 09:33. Process took approximately 20 minutes.	Delay from CCO advising Control Room of the need for an Oral Declaration to Duty Manager, Control Room did not advise Duty Manager of need for oral declaration. Direction to curtail demand template used initially in error. Time delays – Declaration Notice published at 09:57. 56 minutes after 1st inject. 50 minutes after CCO advised the need for an oral declaration.
09:42	CCO	GIC	Call to advise CC being declared, left voicemail.	
09:52	TSO Duty Manager	CCO	Critical Contingency Notice CC-089 based on discussion sent as confirmation.	
09:56	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 79012 "Exercise Tukurua –Critical Contingency Declaration Notice CC-089" - Action Required.	Notice published 56 minutes after inject #1 issued.
09:58	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 79013 "Exercise Tukurua –Critical Contingency Declaration Notice CC-089" - Action Required.	Notice published 58 minutes after inject #1 issued
09:57	CCO	GIC	CCO advised GIC that a CC is being declared and the background information leading up to the declaration.	
10:04	CCO	TSO & Stakeholders	<b>Confirmation of Critical Contingency Declaration notice CC-089 emailed to TSO &amp; Stakeholders.</b>	

Time	From	To	Details	Observation
10:06	CCO		CCO website updated with Declaration Notice CC-089	
10:06	CCO	CCO SMS Contacts	SMS text advising CC-089 has been published.	
10:08	Exercise Control	BBK Control Room	Inject #2 emailed and followed with phone call.	
10:10	TSO Intelligence - EMT	CCO	Call to advise who has taken on the CCO Liaison role and establishing contact. CCO queried anticipated curtailment requirements	
10:20	CCO	TSO Intelligence - EMT	CCO requesting an update that was expected at 10am. Discussion to confirm pipeline isolation point and need to establish curtailment requirements. CCO prepares demand curtailment notice.	Notable lack of urgency from TSO regarding the need for demand curtailment.
10:40	TSO Intelligence - EMT	CCO	Security of Supply Alert #2 issued. 32 minutes after inject #2 provided.  Next update scheduled for 11:10.	Alert #2 issued 40 minutes later than scheduled 10:00 update.  System conditions are still described as average.
10:48	TSO Intelligence - EMT	CCO	Discussion re current status. Repair time estimated at 3 days. Confirmed need for curtailment to Band 6.	
10:52	TSO Intelligence - EMT	CCO	Draft Firstgas Asset Owner Statement sent for review/comment.	Exercise, exercise, exercise used in the email header.
10:56	CCO	TSO & Stakeholders	<b>Demand Curtailment notice CCO-090 emailed to TSO and Stakeholders.</b>	
11:00	CCO		CCO website updated with Demand Curtailment Notice CC-090.	
11:01	CCO	CCO SMS Contacts	SMS text advising CC-090 has been published.	
11:03	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 79014 "Exercise Tukurua" – Direction to Curtail Demand Notice CC-090" - Action Required.	Notice was published 7 minutes after CCO Notice issued.
11:04	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 79015 "Exercise Tukurua" – Direction to Curtail Demand Notice CC-090" - Action Required.	Notice was published 8 minutes after CCO Notice issued.
11:06	CCO	GIC Critical Compliance	Formal request sent to GIC confirming they are authorized to support the CCO with media related activities.	

Time	From	To	Details	Observation
11:08	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 79016 "Exercise Tukurua" – Direction to Curtail Demand Notice CC-090" - Action Required.	Notice was published 12 minutes after CCO Notice issued. It is assumed this was a corrected notice to replace ID 79014.
11:08	Exercise Control	BBK Control Room	Inject #3 emailed to Control Room and followed up with phone call.	
11:12	TSO Intelligence - EMT	CCO	Security of Supply Update #3 scheduled for 11:10 issued.	System conditions still being described as average.
11:17	TSO Intelligence - EMT	CCO	Calling to provide an update Discussion re Draft Asset Owner Statement. Repair time estimated at least 3 days. CCO recommended Retailers be instructed to issue Media Appeals.	Update provided 9 minutes after inject #3 provided.
11:22	Mercury	CCO	Curtailment compliance update sent to CCO instead of Firstgas.	CCO advised Mercury that updates should be sent to Firstgas.
11:27	<b>CCO</b>	<b>Retailers</b>	<b>Retailers to Implement Media Appeals notice CCO-091 emailed to Retailers.</b>	CCO failed to copy Firstgas in on the issuing of the Notice.
11:28	CCO		CCO website updated with Media Appeals Notice CC-091.	
11:33	CCO	CCO SMS Contacts	SMS text advising CC-091 has been published.	
11:35	Greymouth	CCO	Suggestion to improve the description of the affected geographic area. Suggestion forwarded to interested parties.	
11:39	Greymouth	CCO	Curtailment compliance update sent to CCO. Greymouth advised updates should be sent to Firstgas.	
11:46	FGL Media	CCO	Draft Media Statement sent for information. CCO provided feedback.	
12:05	TSO Intelligence - EMT	CCO	Discussion re status. No changes. Asset Owner Statement to be provided by 12:15pm.	
12:19	TSO Intelligence - EMT	CCO	Asset Owner Statement issued.	
12:22	TSO Intelligence - EMT	CCO	Security of Supply Update #4 issued.	

Time	From	To	Details	Observation
12:25	TSO Intelligence - EMT	CCO	Phone call to advise that Mercury were unaware of the Retailer Media Appeal Notice but had since been advised.	
12:36	CCO	TSO Intelligence - EMT	Draft Status Update Notice CC-092 sent for review.	
12:54	TSO Intelligence - EMT	CCO	Draft notice CC-092 sent for review. Subsequent discussion agreed changes	
12:59	CCO	TSO & Stakeholders	<b>Status Update Notice CC-092 emailed to TSO and Stakeholders.</b>	
13:00	CCO		CCO website updated with Status Update Notice CC-092.	
13:01	CCO	CCO SMS Contacts	SMS text advising CC-092 has been published.	
13:15	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 79017 "Critical Contingency Firstgas Asset Owner Statement 21 May 2025"	
13:18	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 79018 "Exercise Tukurua" – Critical Contingency Firstgas Asset Owner Statement 21 May 2025"	
13:19	CCO	Mercury Media	Call to enquire if Media Appeal has been compiled and request a copy.	
13:20	Greymouth	CCO	Further feedback provided to improve the description of the affected area.	
13:22	TSO	Stakeholders	OATIS (Maui) New Critical notice ID 79019 "Exercise Tukurua" – Status Update CC-0092" - Action Required. 23 minutes after CCO Notice issued.	
13:23	TSO	Stakeholders	OATIS (Vector) New Critical notice ID 79020 "Exercise Tukurua" – Critical Contingency Status Update CC-092" - Action Required. 24 minutes after CCO Notice issued.	
13:25	Critical Compliance	CCO	1 <sup>st</sup> consolidated update of Retailer curtailment compliance.	Discrepancy with ICP numbers. Some Retailers sent information in wrong format.
13:32	TSO Intelligence - EMT	CCO	Call to provide update. Advised that Schedulers working on Curtailment Compliance numbers and liaising with Retailers.	

Time	From	To	Details	Observation
13:41	TSO Intelligence - EMT	CCO	Security of Supply Update #5 issued.	
13:47	Exercise Control	BBK Control Room	Inject #4 emailed to Control Room. and call to confirm.	
13:48	TSO Intelligence - EMT	CCO	Call to provide update on Curtailment Compliance numbers and liaison with Retailers.	
13:53	GIC	CCO	Draft Media Release issued for comment. Feedback provided.	
13:57	Critical Compliance	CCO	2 <sup>nd</sup> consolidated update of Retailer curtailment compliance issued.	Contact's ICP numbers significantly different from GIC numbers. Some curtailment of Band 7 included.
13:59	Mercury Media	CCO	Draft Media Appeal issued. Feedback provided.	Protocol Template not used. Several errors in statement.
14:07	TSO Intelligence - EMT	CCO	Security of Supply Update #6 issued. 20 minutes after Inject #4.	
14:22	Critical Compliance	CCO	3 <sup>rd</sup> consolidated update of Retailer curtailment compliance.	Numbers improved significantly.
15:02	Exercise Control	CCO Email Contacts	Inject #5 issued. Confirming the final inject.	
15:06	Critical Compliance	CCO	4 <sup>th</sup> consolidated update of Retailer curtailment compliance issued.	
15:27	Mercury Media	CCO	Final Media Appeal to conserve Domestic Gas use issued.	
15:52	Exercise Control	CCO Email Contacts	Email to advise Exercise Tukurua has ended.	
15:52	CCO		Website updated to advise Exercise Tukurua has ended.	
15:53	CCO	Stakeholders	SMS to advise Exercise Tukurua has ended.	
15:55	CCO	Retailers	Retailer Feedback Template issued.	



## 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-089	Critical Contingency Declaration	09:33	09:56	09:58
CC-090	Direction to Curtail Demand	10:56	11:03	11:04
CC-092	Status Update Notice	12:59	13:22	13:23

CCO Notice CC-090 Retailers to Implement Media Appeals was not provided to the TSO.

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 Tukurua

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>				
	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
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 TUKURUA – 21 May 2025

##### NZ's major gas retailers' initiate gas conservation appeal

Residential gas customers in West Auckland and Northland are being asked to conserve their use of gas while repairs are made to a damaged pipeline in Glen Eden, Auckland.

Firstgas, which owns and operates the gas pipe network, has dispatched an emergency response team to the damaged pipe, but it could be at least 72 hours before it is repaired.

The Gas Industry Critical Contingency Operator, which is responsible for managing critical events on the gas network, has asked that domestic gas customers reduce their use to ~~stabilise~~ pressure in the affected section of the gas pipeline.

Mercury Chief Executive Stew Hamilton, the spokesperson for New Zealand's four major gas retailers, said backed the appeal for gas conservation.

But he understood that asking people to reduce gas use would cause disruption to households in the impacted areas.

"We are thinking of our customers ~~at this time~~, and we are here to help. We appreciate the number of people that are impacted.

"We are appealing to people to think carefully about their gas use while repair work on the damaged pipe is underway.

"We need to reduce gas use so we can carry out the repair work quickly and safely."

Mr Hamilton said people needed to be careful not turn off the services at the valve gas meter.

"All consumers need to do, is to use their gas appliances sparingly, think about turning off gas-fired heaters, stoves/hobs or hot water if they're not being used. People can still use electricity for their appliances at home."

Anyone who is dependent on gas for their medical needs at home, please contact your retailer or medical provider.

People can visit their retailers' websites for more information and for further updates.

\*New Zealand's four major gas retailers; Contact, Genesis, Mercury and Pulse Energy are signatories to a Gas Retailers Communications Protocol to respond to emergency events. Mercury is the lead retailer for 2025.

##### Suggested social media post

A heads-up for our residential and commercial gas customers in West Auckland and Northland – please urgently reduce your gas use now. It is still safe to use gas, but damage to a pipeline has created emergency supply issues. Teams are working on a fix, but the problem may not be sorted until Friday. Until then, please use your gas appliances only when you really need to. We'll keep you posted on progress in getting supply back to normal.

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



## **Media Advisory**

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

This is a message for residential natural gas consumers in West Auckland including Glen Eden and north, North Shore of Auckland, and all areas up to Whangarei in Northland.

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 Auckland and Northland. 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 72 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

## F - Asset Owner Statement

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

Firstgas Limited – Transmission System Event Public Statement / Update:	
Report No:	21/05/2025_1.10pm_Update No.1
What has Happened?:	<p>Firstgas is responding to a leak on the North Gas Transmission Pipeline, affecting the system North of Waikumete Mainline Valve, Glen Eden to Kauri Delivery Point, North of Whangarei. The leak is the result of the pipeline being struck by a third party this morning. The leak has been isolated by closing Waikumete Mainline Valve and Links Road Mainline Valve, in Glen Eden, Auckland. Fire and Emergency New Zealand are onsite and have cordoned off the area to ensure public safety.</p> <p>The Critical Contingency Operator has declared a Critical Contingency and issued demand curtailment instructions to manage the system until the pipeline can be safely repaired and returned to service.</p>
Actions Being Taken to Effect Repairs:	Firstgas has assessed the damage and is now planning repair and return to service.
Estimation of the Likely Duration of each Step of the Repair Process:	Repairs will commence at 19.00. Repair, testing and recommissioning of this section of pipeline is estimated to take at least 72 hours. Further updates will be provided as repair plans are finalised.
Estimated Time of When the Component will be Returned to Service:	The estimated time is 19.00 on Saturday 24 May, 2025.
Will the Component be Temporarily Restored to a Reduced Level of Service?:	No this is not anticipated at this stage. Repairs should enable a return to full operating capacity.

- 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)