

# **CRITICAL CONTINGENCY OPERATOR**

## **COMMUNICATIONS PLAN**

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

**ISSUE DATE: September 2026**

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| 10  | 01/03/22 | Updated for change from Core Group to Plant & Platform | RD          | GA         | 24/02/22               |
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## **1.0 PURPOSE**

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

- First Gas Limited (Firstgas) is the TSO.
- The TSO publishes a Critical Contingency Management Plan (CCMP).
- This Plan has been prepared by the CCO in consultation with the TSO.
- 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).

No later than 20 business days after terminating any actual critical contingency or test exercise, the CCO will prepare and publish a draft performance report under Regulation 65.

This report reviews how well this Plan supports the purpose of the Regulations.

Stakeholders will have at least 5 business days to make a submission on the report. All submissions will be forwarded to GIC to be published on the GIC website.

No later than 10 business days after the deadline for making submissions the CCO must, prepare and publish the performance report and send a copy of the performance report to the industry body.

If the report recommends changes, this Plan will be updated and republished in line with Regulation 37(4).

## 3.0 OVERVIEW

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

- Monitoring the transmission system before a critical contingency declaration
- 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 directions from the CCO, 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 is able to monitor the transmission system and stay informed and ready to act if a critical contingency arises.

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

- During normal system conditions
- During abnormal conditions that do not yet qualify as a critical contingency
- During potential and actual critical contingencies

These requirements align with Regulations 38 and 38A.

A summary of the Communications Protocol is included in Appendix 1.

If there is any conflict between this Plan and the Communications Protocol regarding the provision of information and communications, the requirements set out in the Protocol will be given priority as it contains greater detail.

## 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
- 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. This includes a short-term or unavoidable breach as a result of a planned outage or reduction in pressure where a determination is not necessary to achieve the purposes of the Regulations, and is subject to consultation between the TSO or distributor and the CCO prior to the event.

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 Firstgas 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 Regulations do not require a Potential Critical Contingency Notice, but the CCO and TSO consider it good practice to notify stakeholders when circumstances and time allow. 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 (subject to the transient conditions and other considerations referred to in section 6.0 of this Plan), 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 is not required to declare a critical contingency if it considers that the breach is short-term or unavoidable as a result of a planned outage, and a determination is not necessary to achieve the purposes of the Regulations.
- 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)), including;

- subsets of gas-fired electricity generation after consulting the Electricity System Operator (ESO);
- geographical subsets;
- percentage-based subsets (based on consumption at declaration);
- gas-gate subsets;
- subsets defined by transmission pressure levels.

There are specific rules for Bands 1 and 2 electricity generation: Before curtailing these bands, the CCO will consult the 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.

Further rules apply requiring consumers with critical processing designations to stop using gas as soon as possible where:

- The consumer is in bands 1 to 3, prior to any notification to curtail any consumers in band 4; or
- A curtailment direction is given in respect of curtailment band 6; or
- The CCO directs full curtailment under Regulation 53.

#### **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 of the Regulations, 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 of the Regulations, 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 domestic consumers that cannot be 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

Schedule 10 of the Firstgas CCMP lists circumstances where alternative demand restoration arrangements may 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 of the Regulations, it must advise the CCO.

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

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

## 8.5 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 and, in the form specified in the CCMP.

To streamline this:

- The TSO provides separate templates for Retailers and Large Consumers which are available on OATIS and the CCO websites.
- Each group should send updates to the TSO 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 decision making.

## 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 within 30 minutes.

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

Under Regulation 54A, any asset owner whose asset has been damaged, fails, or is subject to an unexpected interruption, and that damage, failure, or unexpected interruption either:

- contributes to the critical contingency by reducing gas delivered into or from the transmission system by 5 standard cubic meters per second or more; or
- has caused the critical contingency

must regularly publish updates so interested parties know what is happening.

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, failed or unexpectedly interrupted asset and what caused it
- (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.<br><br>Email SoS Update (CCO-053) at periods specified by CCO at the time of the event. |

| <b>INFORMATION</b>                | <b>INFORMATION TO BE PROVIDED</b>                                                                                                       | <b>FREQUENCY &amp; TIMEFRAME</b>                                                            |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| 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                                                                                  |