# Appendix 1: List of questions for submitters

Statement of Proposal - amendments to the Gas Governance (Critical Contingency Management) Regulations 2008

Submission prepared by: (company name and contact)

| QUESTION | | COMMENT |
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| Q1: | Are there any other matters that should be addressed when considering proposals to amend the CCM Regulations? |  |
| Q2: | Do you agree with the Gas Industry Co proposal to combine bands 2 and 3? If not, please provide your reasons. |  |
| Q3: | Do you consider that the option of trading gas usage rights during a critical contingency is worth exploring? Please explain your reasoning. |  |
| Q4: | Do you agree that regulation 53(1)(d)(ii) and 53(2) provide the necessary flexibility for the CCO to respond to changing circumstances? |  |
| Q5: | Do you have any comments on the analysis of ESP consumers? |  |
| Q6: | Are the proposed categories appropriate? Are there any additional categories that you think should be included? If so, please provide your justification. |  |
| Q7: | Do you agree with the option evaluation set out above? If not, please explain why. |  |
| Q8: | Are there any other criteria for MLC designation that you feel would be appropriate? Please include your justification for any that you consider should be added. |  |
| Q9: | Would you delete any of the proposed categories? |  |
| Q10: | Should electricity generators be eligible for MLC status, as described in the first option above? Or should there be a separate category, as described in the second option? |  |
| Q11: | Do you agree with the above evaluation of options? If not, please explain why. |  |
| Q12: | Do you agree with the above evaluation of options? If not, please give your reasons. |  |
| Q13: | Do you agree with the 9-month timeframe for transitioning to the new ESP and MLC arrangements? |  |
| Q14: | Do you agree with the tight provisions for designations during a critical contingency event? |  |
| Q15: | Do you agree that the communications framework outlined above is the minimum that should be provided for in terms of public communications during a contingency event? If not, please give your reasons. |  |
| Q16: | Have we correctly identified the parties that should provide communications and the information that each should provide? |  |
| Q17: | Do you agree that contingency imbalances should only apply in the case of non-regional contingencies? If not, what rationale would you provide for applying contingency imbalances to all critical contingencies (given that the Vector Transmission Code already provides for shipper mismatch)? |  |
| Q18: | Do you agree that a set of guidelines would be the most efficient way to identify regional contingencies? |  |
| Q19: | Do you agree that the CCO is the best party to determine regional/non-regional status of a critical contingency? If not, who would have better information on which to base a determination? |  |
| Q20: | Do you agree that the CCO’s role should allow direction of system reconfiguration, as outlined above? Is it important that the CCO only make such a direction where it is supported by the affected TSO? |  |
| Q21: | Do you agree with this analysis? If not, please state why. |  |
| Q22: | Do you agree that the CCO is best placed to write the performance report after a critical contingency? If not, who would be better placed? |  |
| Q23: | Do you agree with the modifications to the performance report provisions outlined above? If not, please identify those you do not agree with and explain why. |  |
| Q24: | Do you agree that the CCO should collect and publish information on scheduled outages as outlined above? If not, please explain why. |  |
| Q25: | Do you agree that if the CCO requires more granular data, the most efficient source would be the allocation agent? If not, what other means would you suggest, and why? |  |
| Q26: | Do you have any comment on the need to ensure that Gas Industry Co is always able to appoint a party as the CCO and the need to ensure that the CCO always has access to the information and data required to fulfil the role? |  |
| Q27: | Gas Industry Co proposes annual notifications to customers as a means of encouraging customers to make appropriate arrangements to cope with a critical contingency. Do you agree with this frequency and if not, why not? |  |
| Q28: | Given that the seriousness of a situation that requires curtailment of Band 6, do you agree with the proposal to use text messaging to contact Band 6 customers urgently? If not, how would you propose to notify these customers in a manner that ensures they understand the need to curtail their gas use? |  |
| Q29: | While we are sympathetic to retailers’ concerns about contacting large numbers of customers, there appears to be merit in placing a ‘best endeavours’ obligation on retailers to contact at least their largest customers in Band 6 regarding curtailment progress. Please provide your views on this issue. |  |
| Q30: | Please provide your views on the proposals outlined above for retailer curtailment plans. |  |
| Q31: | Do you agree that retailers are best placed to assist their customers in applying for ESP or MLC status? |  |
| Q32: | Do you agree with the changes proposed to improve compliance with the CCM Regulations? |  |
| Q33: | Do you agree that using data from the allocation agent is the most expedient way of checking compliance with curtailment directions by ToU-metered customers? If not, what alternative would you suggest, and why? |  |
| Q34: | Do you agree with this proposal? If not, please give your reasons. |  |