

Appendix 1: List of questions for submitters

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| 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? | Yes. The Maui outage seemed to in general be managed well in this respect. |
| 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. | We agree in general with your proposed categories for ESP |
| Q7: Do you agree with the option evaluation set out above? If not, please explain why. | |

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| <p>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.</p> | <p>We have always considered that we comply with any curtailment instructions by shutting off gas usage “ as soon as reasonably practicable ”</p> <p>By this we understand that we reduce gas usage as quickly as possible while ensuring that the plant operation remains safe and there is minimal detrimental impact on our equipment and materials being processed.</p> <p>However, in reviewing your proposal, we consider that it may be more appropriate that some of our plants fit into the MLC category. Stopping gas usage instantly in some plants would result in significant costs in disposing of partially processed material and readying the plant for startup as well significantly increasing the risk of equipment damage.</p> <p>For this reason we support the expansion of MLC criteria to include this type of situation.</p> <p>We also consider that an improvement in communication, in particular pre warning of potential curtailment would materially assist in this area.</p> |
| <p>Q9: Would you delete any of the proposed categories?</p> | <p>See above</p> |
| <p>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?</p> | <p>We consider that the any criteria for allowing generators MLC status as described would only be at the request of the System Operator for reasons of system security and stability.</p> |
| <p>Q11: Do you agree with the above evaluation of options? If not, please explain why.</p> | <p>We in general agree with your evaluation of the options. We believe that improvements may need to be made to the model/s that the CCO uses that presumably must incorporate any information from MLC consumers and would welcome a workshop process with the CCO and GIC to explore how to optimise this aspect of curtailment.</p> |
| <p>Q12: Do you agree with the above evaluation of options? If not, please give your reasons.</p> | <p>We agree with the GIC option proposed as a major requirement of any MLC and ESP evaluation and approval is consistency and only the GIC can in our view provide this.</p> |
| <p>Q13: Do you agree with the 9-month timeframe for transitioning to the new ESP and MLC arrangements?</p> | <p>Yes</p> |
| <p>Q14: Do you agree with the tight provisions for designations during a critical contingency event?</p> | <p>Yes</p> |

| QUESTION | | COMMENT |
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| 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? | See our comments in Q8 above. We support the comments in the MGUG submission on communications. In particular, perhaps s even some form of “yellow/orange/red alert” pre-warning type system where the levels of alert are clearly defined so large consumers in particular can have a reasonably firm basis for contingency planning even if the time available may be a small number of hours. |
| 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? | Yes. But see comments on the CCO system model in Q11. An improved model may well be useful for this aspect of the CCO’s duties also. |
| 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? | Yes. |

| QUESTION | COMMENT |
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| 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? | We agree that the CCO does need more granularity in their model. Historical actual usages along with MLC information would seem to be the best sources of data for the model. There may even be some benefit in the CCO providing their model data for individual larger retailers and consumers to them for their comment. |
| 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? | Yes |

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| <p>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?</p> | |
| <p>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.</p> | |
| <p>Q30: Please provide your views on the proposals outlined above for retailer curtailment plans.</p> | |
| <p>Q31: Do you agree that retailers are best placed to assist their customers in applying for ESP or MLC status?</p> | <p>Yes. They should have sufficient understanding of their customer's potential issues that would allow to them to be helpful in the preparation of applications for ESP or MLC status.</p> |
| <p>Q32: Do you agree with the changes proposed to improve compliance with the CCM Regulations?</p> | |
| <p>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?</p> | |

| QUESTION | COMMENT |
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| Q34: Do you agree with this proposal? If not, please give your reasons. | |