

Ministry of Civil Defence & Emergency Management submission regarding GIC Statement of Proposal – CCM Regulations

General comment – MCDEM thoroughly supports GIC’s approach to promoting the need for all gas users to develop and maintain their business continuity plans to ensure their continued and safe operations in the wake of a gas outage. MCDEM would be happy to assist GIC with any language for education material to gas sector customers, and provide links to resources as may be appropriate.

Q2 (p29) MCDEM Supports GIC combining the current bands 2 and 3.

Q6 (p43). MCDEM supports the proposed categories of *Essential Service Providers* and *Critical Care Providers*. However there are a couple of considerations: the proposed critical care providers includes laundry suppliers to other critical care providers, which is in direct contradiction to previous statements in the proposal around providers to critical care and essential service providers *not* receiving such a status simply on the basis of providing a service to essential services. Although MCDEM wishes to see essential services and critical care providers served to their needs, we warn that this may be the ‘thin edge of the wedge’ of service providers which provide essential services with “essential services” (eg-chemical companies which provide chemicals for water treatment). This may lead GIC to a situation in an event similar to the influx of essential service applicants received during the Maui pipeline outage. We suggest that exceptions of this nature are thought through in more detail before inclusion, and/or that a criteria for exceptions is thought through for the use of GIC during an outage to avoid over stacking of the band.

Q7. (p48). MCDEM supports the concept review option outline in the SOP. We do suggest that more definition may be required around ‘municipal services’ and “other emergency services”.

Q8. (p50)MCDEM supports the categories of eligibility for MLC status, however we suggest that a strict and more detailed assessment criteria be defined for those applying on the basis of ‘Completion of critical processing’, in order for this category not to erode the usefulness of the MLC category.

Q10. (p50) MCDEM supports the concept of a special MLC category for electricity generators to allow for support of the electricity grid via a short term increase use of gas.

Q15. (p65)MCDEM agrees with the communication outlined in the SOP. We suggest that GIC explores the merit in aligning public messaging options/formats on voluntary-curtailment with MBIE’s Oil Emergency Response Strategy, so as to develop a consistent approach to energy rationing campaigns.

Q16. (p65)MCDEM requests that MCDEM and CDEM Group duty officers are maintained on the CCO’s distribution list for notifications.

Q27. (p82) MCDEM agrees with GIC’s annual notification proposal for gas consumers. As stated above we would encourage GIC to promote good BCP practices in such notifications and MCDEM is willing to assist in the development of such messages.

Q28. & 29 (p83) MCDEM supports the idea of using any technology that may speed up the delivery of time critical information, such as by text messages. We would caution however that establishing and maintaining such a contact list and a mechanism with which to contact customers may be quite an onerous task for retailers. However there is benefit in establishing and maintaining such a list, including the ability to remind customers of their need for business continuity planning.

Q30. (p85) MCDEM supports the suggestion of retailers maintaining curtailment plans, and suggest that these should be part of retailer's broader continuity plans.

Regards,

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