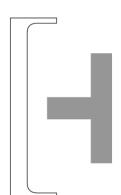
# **CRITICAL CONTINGENCY OPERATOR**



# Critical Contingency Performance Report Mount Maunganui 25 September 2024



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

Final Report Published 25 November 2024

# **Contents**

1.	Intro	oduction	1
2.	Exec	utive Summary	2
3.	Gas	flow data for the Mount Maunganui Gas Gate on 25/26 September	4
4.	Revi	ew of the Event Response and Management	7
4 4 4	.1 .2 .3 .4 .5	Prior to Determination of a Critical Contingency Critical Contingency Declaration & Notification Consideration of Curtailment Status Updates for Stakeholders System Recovery and Termination of Critical Contingency	8 8 10
5.	Cond	clusions Arising from this Event	12
6.	Asse	ssment and Identified Amendments	14
App	endix	1 – Incident Report Event Log	15
App	endix	2 - CCO and TSO Notices	19

#### 1. Introduction

In accordance with regulation 65 of the Gas Governance (Critical Contingency Management) Regulations 2008 and 2013 Amendments (the Regulations), the Critical Contingency Operator (CCO) must prepare and publish a performance report within 30 business days, or as otherwise agreed between the CCO and the Industry Body (GIC), after making a determination to terminate a critical contingency under regulation 60.

This report has been produced in relation to the critical contingency that was declared at 22:56hrs on Wednesday 25 September 2024 and was subsequently terminated at 02:30hrs on Thursday 26 September 2024. The Incident Report related to this event required by regulation 64 was published on 3 October 2024.

The purpose of this performance report is to:

- assess the effectiveness of the Critical Contingency Management Plan (CCMP), the Communications Plan and the Information Guide
- assess the extent to which the Regulations and these associated documents achieved the purpose of the regulations.
- identify any amendments to the regulations and associated documents that the CCO considers would better achieve the purpose of the regulations.

The Transmission System Owner (TSO) must prepare a proposed revised CCMP consistent with any identified amendments recommended in this report in accordance with regulations 26-30.

The CCO must amend and publish a revised Communications Plan and/or Information Guide consistent with any identified amendments recommended in this report in accordance with regulations 35 and 37 respectively.

The report has been prepared in consultation with the TSO (Firstgas) and any other parties considered necessary. The TSO has provided all the information and assistance requested by the CCO for preparing this report.

### 2. Executive Summary

On the evening of 25 September 2024, the gas supply to the Mount Maunganui gas gate was affected by a blockage in the transmission pipeline (in the pipeline as it enters the gas gate) causing a breach of the critical contingency pressure threshold. Initially the pressure threshold breach was transient, and the pressure recovered. However, the supply to the gas gate became blocked a second time and this time the pressure did not recover. The TSO confirmed to the CCO that the pressure drop was a genuine breach of the critical contingency threshold and that it was not transient, so at 22:56 hrs on 25 September 2024 the CCO declared a regional critical contingency.

Initially the TSO was not certain what had caused the blockage, but subsequently it was determined that a pipeline inspection gauge (PIG) being used for pigging the transmission pipeline in the area had deviated from its intended course and become lodged in the inlet piping at the Mount Maunganui gas gate. The PIG was subsequently dislodged allowing pressure and gas flow at Mount Maunganui to resume.

No demand curtailment directions under the Regulations were required to be given by the CCO.

The critical contingency was terminated at 02:30 hrs on 26 September and the duration of the critical contingency was 3 hours and 34 minutes.

This performance report concludes with the CCO's assessment under r65 which is summarised below.

The key documents under regulation 65 (1) (a) were assessed, in the context of this event, as:

Critical Contingency Management Plan	Effective
CCO Communications Plan	Effective
CCO Information Guide	Effective

The extent to which the regulations and key documents were found to have achieved the purpose of the regulations under regulation 65 (1) (b) was assessed, in the context of this event, as:

Regulations	Purpose achieved
Critical Contingency Management Plan	Purpose achieved
CCO Communications Plan	Purpose achieved
CCO Information Guide	Purpose achieved

Specific amendments identified under regulation 65 (1)(c) were:

Regulations	None
<b>Critical Contingency Management Plan</b>	None*
CCO Communications Plan	None*
CCO Information Guide	None*

<sup>\*</sup> Some amendments may however be required to the CCMP, Communications Plan or Information Guide arising from the implementation of the recommendations made in this report.

#### **CCO's Summary Conclusion:**

The purpose of the regulations is to achieve the effective management of critical gas outages. Although a critical contingency was declared, the CCO did not need to issue demand curtailment instructions. The Regulations require that a critical contingency <u>must</u> be declared if a pressure threshold is breached.

The TSO and CCO worked collaboratively throughout the event to effectively manage the outage. However, the provision of timely and accurate written information from the TSO to the CCO was less than optimal, in part due to the fast-evolving nature of this event and is an area that should be improved.

This scenario, involving the isolation of only one gas gate, highlighted the need to define how demand curtailment under the Regulations fits with gas distribution network owners' emergency response plans and processes.

The full set of observations and recommendations arising from this event are set out in Section 5.

# 3. Gas flow data for the Mount Maunganui Gas Gate on 25/26 September

Background to the transmission system gas flow data received from Firstgas by the CCO prior to and during the event:

During the event, the CCO was receiving data at 5-minute intervals relayed from the Firstgas SCADA system that indicated the inlet pressure and gas flow at the Mt Maunganui gas gate.

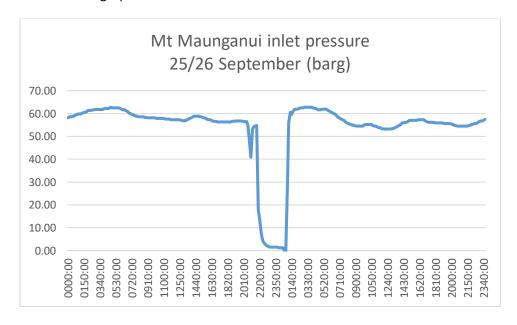
The CCO receives critical contingency threshold data for the ten points of measurement specified in Schedule 1 of the Regulations, but not for 120 or so gas gates covered by the "any other gas gate" point of measurement specified in the Regulations.

The CCO has no visibility on gas gate outlet or Distribution Networks pressure as this is not required under the Regulations.

The transmission pipeline that supplies gas to the Mt Maunganui gas gate also supplies three other gas gates in the vicinity: Papamoa, Te Puke and Rangiuru. The CCO does not receive any information from Firstgas SCADA system indicating the inlet pressure and gas flow at these gas gates. In the initial stages of this event, it was not clear whether any other gas gates were affected by the blockage affecting Mt Maunganui gas gate.

This section provides the data relating to the Mount Maunganui gas gate across the 25 and 26 of September. This data has been provided to the CCO by Firstgas post event.

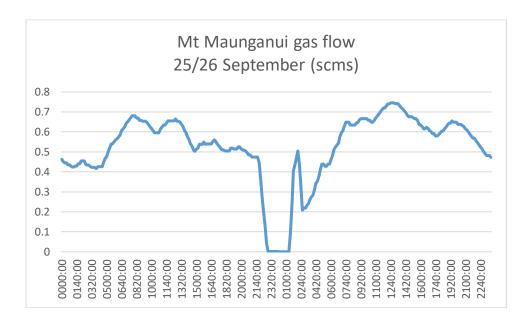
The effect of the pipeline blockage on the inlet pressure to the Mt Maunganui gas gate is shown in the graph below.



The initial drop in pressure to 41 barg occurred at 21:00 hrs, but had recovered to 53 barg by 21:10 hrs.

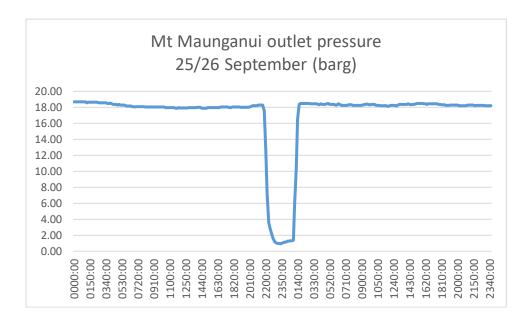
The subsequent drop began at 21:50 hrs and did not recover until 01:20 hrs.

The effect of the pipeline blockage on gas flows through the Mt Maunganui gas gate is shown in the graph below:



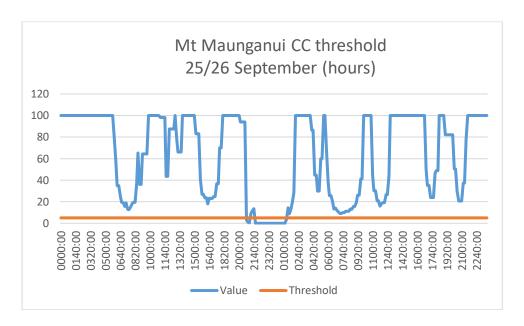
There was negligible flow from 23:00 hrs and NIL flow between 00:10 hrs and 01:20 hrs.

The effect of the pipeline blockage on the outlet pressure from the Mt Maunganui gas gate is shown in the graph below:



The drop in outlet pressure occurred between 22:00 hrs and 01:50 hrs.

The effect of the pipeline blockage on the Mt Maunganui critical contingency threshold is shown in the graph below:



Note: Threshold hours of 100 or more have all been represented as 100 hours to provide appropriate scale within the graph.

The Mount Maunganui gas gate is categorised as "any other gas gate" under the Regulations, and the critical contingency threshold for any other gas gate is set by the TSO in the CCMP as 5 hours until the minimum transmission pipeline pressure of 30 barg is reached.

The first transient breach of the critical contingency threshold occurred between 20:50 hrs and 21:10 hrs. The second sustained breach of the threshold occurred between 21:50 hrs and 01:30 hrs.

## 4. Review of the Event Response and Management

This section assesses the effectiveness of the event response and management against the requirements of the regulations, the CCMP, the Communications Plan and the Information Guide.

A detailed log of the actions taken by the CCO and TSO immediately before and during the critical contingency is provided in the Incident Report which is included in Appendix 1.

#### 4.1 Prior to Determination of a Critical Contingency

The Communications Plan governs the communications between the CCO and the TSO during a critical contingency. Outside of a potential or actual critical contingency the CCO requires access to transmission system information. To achieve this the CCO and TSO have developed a Communications Protocol which sets out the information requirements which apply to the TSO during normal system conditions, as well as during abnormal system conditions, consistent with Regulations 38 and 38A.

The Communications Protocol also sets out in more detail the information requirements which apply during a potential and actual critical contingency. A summary of the Communications Protocol is provided in Appendix 12 of the Communications Plan.

The Communications Protocol requires information to be provided by the TSO to the CCO to enable the CCO to review transmission system availability status, security of supply risk profiles, scheduled maintenance and configuration and outage plans via a Transmission System Status report provided once a month plus ongoing updates as required.

The TSO had supplied a Transmission System Status Report update to the CCO on 19 September. However, although the report does typically detail pipeline pigging activity, this report did not disclose any planned pigging activity in the Mount Maunganui area.

The TSO and CCO also routinely have a monthly liaison meeting where the TSO updates the CCO on matters such as planned maintenance activities and goes through the planned Transmission System Status Report for the next month. The September meeting had been due on 24 September but was cancelled by the TSO due to the unavailability of key TSO representatives.

The CCO was therefore not aware of the planned pigging activity in the Mount Maunganui area.

#### **OBSERVATION:**

During the initial stages of the incident, the CCO had limited information. The completeness of routine information shared by the TSO forms an important part of the picture and assists the CCO in interpreting what may be occurring. In this instance the absence of information about the planned pigging activity impacted the ability of the CCO to understand the situation in the crucial early stages.

#### **RECOMMENDATION:**

The TSO should review its processes for sharing routine information with the CCO about planned maintenance activities with a view to ensuring the information supplied is complete.

The Communications Plan states that if an event has occurred that, in the judgment of the TSO, has the potential to create a critical contingency involving a breach of one or more of the contingency thresholds, the TSO is required to inform the CCO by telephone within 15 minutes and confirm the details in writing within 30 minutes of the event.

The first breach of the Mount Maunganui critical contingency threshold occurred at 20:50 hrs. The second breach of the threshold occurred at 21:50 hrs. Verbal notification of the first breach by phone occurred at 21:09 hrs (19 minutes after the event) and verbal notification by phone of the second breach occurred at 21:59 hrs (9 minutes after the event). Notification of the first event was therefore 4 minutes outside of the 15 minutes required by the Communications Plan, the second was within the required 15 minutes.

No written notice of either of these events was received until 22:37 hrs when the first Security of Supply report was received. This was 1 hour 47 minutes after the initial critical contingency threshold breach and 47 minutes after the second breach. The written information in the Security of Supply reports was found to be in error in a number of aspects, including stating that the threshold breach was considered transient. The replacement Security of Supply report was received at 22:56 hrs, 2 hours 6 minutes after the first breach and 1 hour 6 minutes after the second breach.

#### **OBSERVATION:**

The written confirmation of the event was much slower than the 30 minutes required by the Communications Plan. This had a significant impact on the CCO's ability to be confident in their understanding of the event and to determine in a timely manner that a critical contingency should be declared.

#### **RECOMMENDATION:**

The TSO review its processes for supplying the CCO with written information about abnormal events to improve both the timeliness and the accuracy.

#### 4.2 Critical Contingency Declaration & Notification

At 22:56 hrs the CCO determined that critical contingency conditions had occurred under regulation 48(1)(a) and verbally advised the TSO Duty Manager that a critical contingency declaration notice would be issued as soon as possible.

The critical contingency declaration notice was issued by the CCO to the TSO and subsequently the TSO issued the notice to Retailers and Large Consumers. The notice was issued within the required timeframe set out in the Regulations, CCMP and Communications Plan using the process outlined in the CCMP (e-mail, SMS and posting on OATIS).

#### 4.3 Consideration of Curtailment

There were several aspects to determining the requirement for any demand curtailment during this event, including:

1. Whether Mount Maunganui was the only gas gate affected, or could there be other gates affected that weren't monitored by the Firstgas SCADA system?

Initially there was a possibility that other gas gates could be affected by the event as it was not certain what the cause of the pipeline blockage was, and three other gas gates in the area are not monitored on SCADA by the Firstgas Control Room. The TSO resolved this by sending a technician to site to confirm the other gas gates were functioning normally.

2. Whether demand curtailment was required at all, and if so when it would be required and by how much?

The anticipated need for curtailment was an evolving and fluctuating picture. Initial conversations with the TSO indicated they didn't foresee a need to curtail demand on the network until the morning (prior to peak load). In a call at 23:48 hours, the TSO considered it was now too late for any curtailment as the gas gate had shut down completely and they were already losing supply to

some large consumers on the network.

In a call at 00:03 hrs, the TSO asked the CCO to consider curtailment of consumers in all bands supplied from Mt Maunganui. The CCO requested that the TSO confirm their view that demand curtailment of all bands under the Regulations in a Security of Supply Report, while the CCO prepared the relevant demand curtailment notice.

3. If demand curtailment was required, whether it should be done under the Regulations or by Firstgas Distribution using their distribution emergency response plan?

There was ongoing discussion about if demand curtailment was needed, whether it should be done under the Regulations or by Firstgas Distribution under their emergency response plan.

The purpose of demand curtailment under the Regulations is to stabilise pressure and linepack in any affected part of the transmission system. Once it became clear that only the Mt Maunganui distribution network was affected by the pipeline blockage there was no requirement to stabilise the transmission system.

The matter was resolved when the TSO sent a Security of Supply report at 00:10 stating that Firstgas Distribution had started communicating with Retailers to curtail demand. The CCO agreed with the TSO that the CCO commencing demand curtailment under the Regulations would be confusing if Retailers had already started to receive communication from Firstgas Distribution and that therefore curtailment under the Regulations should not proceed.

#### **OBSERVATION:**

Firstgas Distribution initiated demand curtailment in order to stabilise the distribution network by contacting Retailers. While this can be considered an appropriate course of action under the circumstances, it was initiated without clear consultation with the TSO and CCO which resulted in some confusion.

The purpose of demand curtailment under the Regulations is to stabilise the transmission system. In an event that affects a single gas gate supplying a distribution network, demand

curtailment in a way other than that defined by the Regulations may be more appropriate and effective (for example, isolating particular sections of the distribution network).

#### **RECOMMENDATION:**

GIC develop guidance about how demand curtailment in order to stabilise a distribution network should occur under the Regulations versus under a Distributor's emergency response plan or processes.

#### **OBSERVATION:**

The TSO endeavoured to keep the CCO informed of the current situation via phone calls. The Communications Plan requires the TSO to also provide the CCO with written Security of Supply updates to confirm the current situation. These written updates were requested several times by the CCO during the critical contingency but generally weren't sent in a timely manner that kept pace with the evolution of the event and the TSO's decision making. This made it difficult for the CCO to be confident about what was happening and what action under the Regulations might be required.

#### **RECOMMENDATION:**

The TSO review its processes for supplying the CCO with written information about abnormal events to improve both the timeliness and the accuracy.

#### 4.4 Status Updates for Stakeholders

The Regulations have a general requirement for the CCO to publish updated information on the status of the critical contingency (Regulation 53(g)). Schedule 5(2) of the Regulations require the CCO to publish updated statements at 9am, 1pm and 5pm if there has been curtailment to band 3.

The Communications Plan states that following declaration of a critical contingency, the CCO may publish regular updates on the status of the critical contingency and details how it will comply with the requirements of Schedule 5(2), including a pro forma notice.

In this scenario the requirements of Schedule 5(2) were not triggered as there was no band 3 curtailment. However, the CCO was aware that Retailers would have seen the declaration notice and would be anxious to know if they would be required to action their Retailer Curtailment Plan. The CCO was also conscious of providing an update to all stakeholders.

However, the rapidly unfolding situation meant there was ongoing discussion about what demand curtailment, if any, was appropriate and the CCO was not able to give Retailers a clear lead regarding the need for curtailment. Once the scenario was better understood and the CCO was reasonably confident curtailment under CCM Regulations wouldn't be required a draft Status Update Notice was prepared. By the time the Status Update had been drafted and the TSO agreement was confirmed, the situation had evolved further, and it was expected a critical contingency termination would be sent making the Status Update redundant.

#### **OBSERVATION:**

The CCO received feedback from Retailers that a more timely update after the critical contingency declaration would have been helpful.

#### **RECOMMENDATION:**

The TSO/CCO investigate how to improve processes such that it is possible to get accurate status update information out to stakeholders more efficiently.

#### 4.5 System Recovery and Termination of Critical Contingency

In a call at 01:34 hrs the TSO informed the CCO that gas was now flowing normally at the Mount Maunganui gas gate. While installing a bypass, the pressure equilibrium changed and released the stuck PIG from the inlet piping. The CCO asked the TSO to confirm this in writing, together with their view that they believed the critical contingency could now be terminated.

The 3rd Security of Supply report received at 01:51 contained incorrect information which contradicted the earlier phone call as it indicated pressure had not recovered at Mount Maunganui. This was queried by the CCO, and a replacement Security of Supply report was sent, and the TSO view had also changed requesting that the critical contingency status remain for now while further checks were carried out.

At 02:27 the TSO phoned to inform the CCO that the TSO had completed their checks and were now satisfied the critical contingency could be terminated. This was followed immediately by a 4<sup>th</sup> Security of Supply report confirming this. The CCO was now in a position to be confident that pressure in the system had returned to normal and that flow at the Mount Maunganui gas gate had resumed. The CCO therefore determined that the critical contingency could be terminated, the termination notice was emailed to the TSO at 02:40 hrs and subsequently published by the TSO.

#### **RECOMMENDATION:**

The TSO review its processes for providing the CCO with regular, accurate written information during a critical contingency

## 5. Conclusions Arising from this Event

The purpose of the regulations is to achieve the effective management of critical gas outages. Although a critical contingency was declared, the CCO did not need to issue demand curtailment instructions. (The Regulations require that a critical contingency <u>must</u> be declared if a pressure threshold is breached.)

The TSO and CCO worked collaboratively throughout the event to effectively manage the outage. However, the provision of timely and accurate written information from the TSO to the CCO was less than optimal due to the fast-evolving nature of this event and is an area that should be improved.

This scenario, involving the isolation of only one gas gate, highlighted the need to define how demand curtailment under the Regulations fits with distribution network owners' emergency response plans and processes.

The full set of observations and recommendations were as follows:

#### **Prior to Determination of a Critical Contingency**

#### **OBSERVATION:**

During the initial stages of the incident, the CCO had limited information. The completeness of routine information shared by the TSO forms an important part of the picture and assists the CCO in interpreting what may be occurring. In this instance the absence of information about the planned pigging activity impacted the ability of the CCO to understand the situation in the crucial early stages.

#### **RECOMMENDATION:**

The TSO should review its processes for sharing routine information with the CCO about planned maintenance activities with a view to ensuring the information supplied is complete.

#### **OBSERVATION:**

The written confirmation of the event was much slower than the 30 minutes required by the Communications Plan. This had a significant impact on the CCO's ability to be confident in their understanding of the event and to determine in a timely manner that a critical contingency should be declared.

#### **RECOMMENDATION:**

The TSO review its processes for supplying the CCO with written information about abnormal events to improve both the timeliness and the accuracy.

#### **Consideration of Curtailment**

#### **OBSERVATION:**

Firstgas Distribution initiated demand curtailment in order to stabilise the distribution network by contacting Retailers. While this can be considered an appropriate course of action under the circumstances, it was initiated without clear consultation with the TSO and CCO which resulted in some confusion.

The purpose of demand curtailment under the Regulations is to stabilise the transmission system. In an event that affects a single gas gate supplying a distribution network, demand curtailment in a way other than that defined by the Regulations may be more appropriate and effective (for example, isolating particular sections of the distribution network).

#### **RECOMMENDATION:**

GIC develop guidance about how demand curtailment in order to stabilise a distribution network should occur under the Regulations versus under a Distributor's emergency response plan or processes.

#### **OBSERVATION:**

The TSO endeavoured to keep the CCO informed of the current situation via phone calls. The Communications Plan requires the TSO to also provide the CCO with written Security of Supply updates to confirm the current situation. These written updates were requested several times by the CCO during the critical contingency but generally weren't sent in a timely manner that kept pace with the evolution of the event and the TSO's decision making. This made it difficult for the CCO to be confident about what was happening and what action under the Regulations might be required.

#### **RECOMMENDATION:**

The TSO review its processes for supplying the CCO with written information about abnormal events to improve both the timeliness and the accuracy.

#### **Status Updates for Stakeholders**

#### **OBSERVATION:**

The CCO received feedback from Retailers that a more timely update after the critical contingency declaration would have been helpful.

#### **RECOMMENDATION:**

The TSO/CCO investigate how to improve processes such that it is possible to get accurate status update information out to stakeholders more efficiently.

#### All stages of a Critical Contingency

#### **RECOMMENDATION:**

The TSO review its processes for providing the CCO with regular, accurate written information during a critical contingency

## 6. Assessment and Identified Amendments

The purpose of 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.

This section assesses the effectiveness of the regulations, the CCMP, the Communications Plan and the Information Guide in the context of this event and identifies any amendments to these that would better achieve the purpose of the regulations.

In accordance with regulation 65 (1) (b), and in the context of this event, the CCO considers the regulations, CCMP, Communications Plan and Information Guide all achieved the purpose of the regulations.

In accordance with regulation 65 (1) (a), and in the context of this event, the CCO considers that the CCMP, the CCO Information Guide and CCO Communications Plan were all substantially effective with the following observations:

#### Regulations

No amendments to the regulations have been identified because of this event.

#### **CCMP**

No specific amendments to the CCMP have been identified because of this event at this stage. However, some amendments may be required as a result of the implementation of the recommendations made in this Report.

#### **CCO Communications Plan and Information Guide**

No specific amendments to the Communications Plan and Information Guide have been identified because of this event at this stage. However, some amendments may be required as a result of the implementation of the recommendations made in this Report.

# Appendix 1 – Incident Report Event Log

# Log of actions taken by CCO and TSO immediately before and during the Critical Contingency as provided in the Incident Report

Time	Action Taken	
21:09	TSO Control Room called Duty CCO to advise there had been a sudden pressure drop at the Mt Maunganui gas gate breaching the CC threshold, but the pressure had now bounced back to normal. Not sure of the cause, or why it had recovered. Could be related to pigging in the area. Technicians had been mobilised to site to investigate. Details would be sent in a Security of Supply report by email to confirm, but all was now OK.	
21:59	TSO Control Room called to advise there had been a repeat drop of pressure at Mt Maunganui breaching the CC threshold which, this time, had not recovered. Duty CCO advised that a CC event will need to be declared unless it was a transient breach. Control Room was phoning the TSO Duty Manager who would be asked to phone the CCO. CCO asked the Control Room to send a Security of Supply report via email.	
22:04	TSO Duty Manager called the CCO, he was mobilising to the Firstgas office to confirm the nature of the incident. A sudden pressure drop followed by a recovery, then another sudden drop was unusual, and he wanted to confirm it was not a SCADA fault.	
22:21	TSO Duty Manager called the CCO and confirmed the pressure threshold data was correct and there was corroborative data downstream on the Mt Maunganui distribution system of the pressure drop. No other problems were indicated at any other gas gate at this stage, although not all are on SCADA	
	CCO advised it would prepare a CC Declaration Notice but needed the Security of Supply report to confirm the information provided as no written information had been received.	
	Initial discussions were held about the need for demand curtailment of consumers supplied by the Mt Maunganui gas gate. The TSO advised that curtailment might not need to be in place until the morning load. Firstgas Distribution colleagues had identified a specific consumer with a large overnight load that they could curtail.	
22:37	Security of Supply report #1 e-mail received by CCO from TSO. However, it contained some incorrect information relating to a previous incident in a different location.	
22:44	CCO asked the TSO Duty Manager to review and correct Security of Supply report #1.	
22:56	Revised Security of Supply report #1 received by CCO from TSO, confirming CC threshold non-transient breach at Mt Maunganui. Based on the information received, the CCO declared a Critical Contingency.	
22:59	TSO Duty Manager called the CCO to discuss the preparation of the Declaration Notice. There was also a discussion about how the situation could be confirmed re the non-Scada gas gates and whether they might be affected.	

Time	Action Taken	
23:12	CCO emailed Draft CC Declaration Notice CC-087 to TSO for review.	
23:19	TSO confirmed their agreement with the content of the CC Declaration Notice.	
23:21	CCO called Gas Industry Company to advise that a Critical Contingency had been declared and a Notice was being prepared for publishing.	
23:27	CC Declaration Notice CC-087 emailed to TSO and copied to CCO Stakeholders.	
23:30	CC Declaration Notice CC-087 published on CCO website Current Events page.	
23:34	CCO sent SMS to CCO Stakeholders advising CC Declaration Notice CC-087 has been published.	
23:38	The TSO called the CCO to confirm the person who had been appointed to the Critical Contingency Liaison function in the Firstgas Emergency Management Team as the CCO's point of contact. There was a brief resume of where things were at and discussions about what demand curtailment might be required.  TSO CC Liaison would forward an internal email from a Distribution colleague about demand curtailment on the Mt. Manganui network.	
23:41	TSO published Critical Notice ID 77333 on OATIS (Maui) - Critical Contingency Declaration Notification - CC-087	
23:42	TSO CC Liaison forwarded internal email from Distribution re demand curtailment requirements.	
23:43	TSO published Critical Notice ID 77334 on OATIS (Vector) - Critical Contingency Declaration Notification - CC-087.	
23:48	The CCO discussed demand curtailment with TSO CC Liaison to clarify if Distribution were curtailing demand on the network under their Emergency Response Plan or expecting curtailment under the CCM Regulations.	
	TSO CC Liaison advised that there was no point in curtailment as blockage of the Mt Maunganui gas gate was absolute, and pressure downstream had already dropped too far for curtailment to be useful. Customers had already been lost.	
	It was confirmed that no gas gates other than Mt Maunganui were affected, as a Firstgas Technician had been sent to site to confirm.	
23:51	A voicemail message was received by the CCO from the Bay of Plenty Civil Defence.	
00:03	CCO called TSO CC Liaison to ask the TSO to respond to the local Civil Defence enquiry.	
	There was further discussion with TSO CC Liaison and TSO Duty Manager, in particular the interaction of CCM Regulations and Firstgas Distribution Emergency Response Plan. TSO Duty Manager asked CCO to consider if demand curtailment under the CCM Regulations would be advisable. Given that there was no supply from the gate, it would likely need to be all consumer bands. CCO requested an updated Security of Supply report to confirm the position while a Demand Curtailment Notice was prepared.	
00:10	CCO received Security of Supply report #2 email from TSO. Report stated that:	

Time	Time Action Taken		
	"Slam shuts closed at Mount Maunganui DP – no supply from this gate"		n this gate"
	"FirstGas Distribution communicating to retailers, field team identifying blockage and remediation plan to be developed."		
00:19	CCO called the TSO Duty Manager. SOS #2 stated that First Gas Distribution had already commenced curtailment conversations with Retailers, if this was correct it would not be helpful for the CCO to initiate different curtailment instructions under the CCM Regulations. It was agreed that the CCO would not issue a Demand Curtailment Notice.		
00:20	TSO CC Liaison returned call to Bay	of Plenty Civil Defence.	
00:36	TSO CC Liaison called the CCO with an update. There was a blockage at the Mt Maunganui inlet valve, and they will be installing a temporary bypass across the valve. They expected this would take 45 minutes and then the inlet pressure would start to come back.		
00:58	CCO drafted a Status Update Notice to let stakeholders know there was not expected to be any demand curtailment under the CCM Regulations, but any demand curtailment would be co-ordinated by Firstgas Distribution. The draft notice was sent to the TSO CC Liaison for review.		
01:16	TSO CC Liaison replied regarding the draft Status Update notice to include Firstgas contact details but didn't confirm if Firstgas agreed with the notice content. CCO called TSO for confirmation.		
01:24	TSO CC liaison returned CCO's call, and confirmed TSO was OK with the Status Update Notice but things had now developed. The TSO had modelled the plan to resume flow at Mt Maunganui by installing a half-inch bypass around the blockage. The TSO's modelling suggested they would be able to get a pressure of 30 barg, although throughput might not be sufficient for full load downstream.  It had been established a PIG launched in a 100mm pipeline had found its way into an 80mm pipeline and got caught in the Mt Maunganui gate station valve. There		
would need to be a follow up job in the morning to retrieve the PIG.		the PIG.	
01:34	TSO CC Liaison phoned to update the CCO. Installation of the bypass had changed pressure equilibriums and released the stuck PIG from the inlet valve and gas was now passing through the gas gate normally without aid of the bypass. The draft Status Update Notice was no longer relevant. The CCO asked the TSO if they agreed that the CC could be terminated. The TSO undertook to confirm.		
01:50	TSO CC Liaison phoned CCO to confirm gas is flowing freely through the Mt Maunganui gas gate and it was thought that the CC could be terminated. A Security of Supply report was requested to confirm the position. CCO undertook to draft a CC Termination Notice.		
01:51	CCO received Security of Supply report #3 email from TSO. The data contained stated that:		
	Pressure at affected CC Threshold/s:	Mt Maunganui DP	Barg 3.4
Time to CC Threshold/s:			Hours 0.0

Time		Action Taken		
	This information contradicted the p		CO phoned the TSO and	
02:04		TSO CC Liaison phoned to explain the TSO now had a preference to hold off from terminating the CC event until they were confident the PIG wasn't going to move and get stuck again.		
02:11 CCO received revised Security of Supply #3 report from TSO of		confirming:		
	Pressure at affected CC Threshold/s:	Mt Maunganui DP	Barg 61.8	
	Time to CC Threshold/s:		Hours 25.4	
02:27		TSO CC Liaison confirmed TSO was now satisfied that there was no further risk to supply, and the CC could be terminated. CCO asked for Security of Supply report as confirmation.		
02:28 CCO received Security of Supply #4 report		report from TSO stating	 port from TSO stating:	
	"Checks completed and TSO is satisfied there is no longer a heightened risk of breaching CC thresholds at Mount Maunganui Delivery Point."			
02:34	CCO sent draft Critical Contingency	CCO sent draft Critical Contingency Termination Notice CC-088 to TSO for review.		
02:39	TSO CC Liaison called CCO to confirm Termination Notice.	TSO CC Liaison called CCO to confirms TSO are happy with the draft CC Termination Notice.		
02:40	CCO received email from TSO confirming they are OK with the content of the CC Termination Notice.			
02:49	CC Termination Notice CC-088 emailed to TSO and copied to CCO Stakeholders.			
02:50	CC Termination Notice CC-088 publ	CC Termination Notice CC-088 published on CCO website Current events page.		
02:51	CCO sent SMS to CCO Stakeholders been published.	CCO sent SMS to CCO Stakeholders advising CC Termination Notice CC-088 has been published.		
02:52	TSO CC Liaison sent email to TSO Sc OATIS.	TSO CC Liaison sent email to TSO Scheduler to post CC Termination Notice to OATIS.		
02:57	TSO publishes Critical Notice ID 773 Termination Notice - CC-088	TSO publishes Critical Notice ID 77335 on OATIS (Maui) - Critical Contingency Termination Notice - CC-088		
02:59	TSO publishes Critical Notice ID 77336 on OATIS (Vector) - Critical Contingency Termination Notice - CC-088			

# Appendix 2 – CCO and TSO Notices

## **Critical Contingency Declaration Notice**

Date:	25 September 2024	
Time:	11:15 pm	
Notice Number:	CC-087	
Notice Type:	Declaration of Critical Contingency	
Notice Issued to:	Firstgas TSO	
	Stakeholders listed in the CCO Information Guide	
CCO Instruction to TSO:	A Critical Contingency has been declared. Communications under the Communications Plan are to commence immediately. Issue notice of Declaration of Critical Contingency to Large Consumers and Retailers within 30 minutes of receiving this notice. Ensure an appropriate critical notice is posted on OATIS as soon as reasonably practicable. The CCO will determine any demand curtailment requirements and advise accordingly.	
Critical Contingency Declaration Time & Date:	25 September 2024 10:56pm	
Event causing Critical Contingency:	The TSO has advised the CCO that the inlet to the Mount Maunganui gas gate is blocked and there has been a large pressure drop.  As a result, the Mt Maunganui pressure threshold has been breached.	
	The CCO has therefore determined that a Critical Contingency exists.	
Summary of actions being taken to resolve event and estimated time to resolve:	The TSO has advised the CCO that they are mobilising an emergency response team to investigate the cause and develop a response plan.	
	The CCO is urgently assessing how this event will impact on the supply of gas to consumers in the Mt Maunganui area to determine what, if any load curtailment may be required.	
	The CCO will issue any load curtailment instructions as soon as possible.	
Regional Critical Contingency Status:	Regional	
Transmission pipeline(s) affected:	The Firstgas Bay of Plenty pipeline	
Geographic area affected:	Mt Maunganui and possibly other gas gates in the immediate vicinity, yet to be confirmed	

This notice is issued pursuant to **Regulation 49** of the Gas Governance (Critical Contingency Management) Regulations 2008 and amendments. All directions issued by the CCO pursuant to this declaration must be complied with.

This notice is issued in accordance with the General Critical Contingency Notice Conditions contained in the CCO Information Guide, CCO Communications Plan and Firstgas CCMP.

The CCO will issue advice of this Notice of Declaration of Critical Contingency to the stakeholders listed in the CCO Information Guide and publish this notice in the public domain of the CCO web site at <a href="https://www.cco.org.nz/current-event/">https://www.cco.org.nz/current-event/</a>

#### **Critical Contingency Termination Notice**

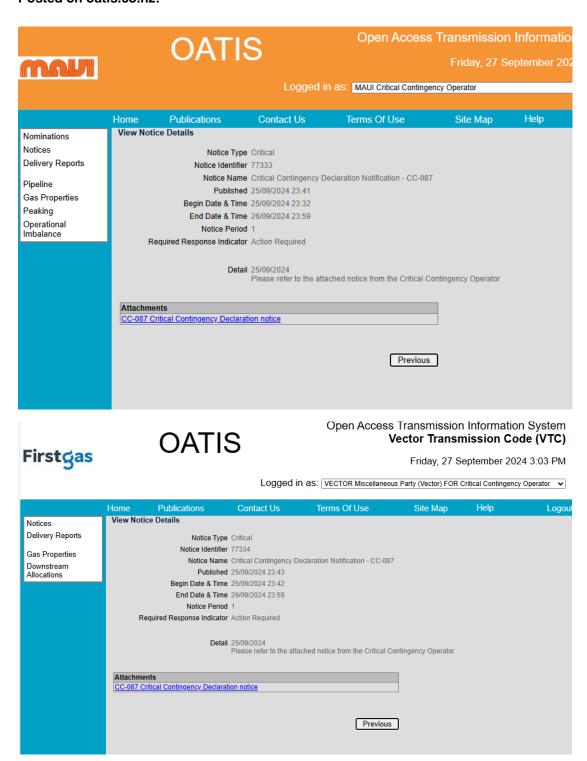
Date:	26 September 2024
Time:	02:45am
Notice Number:	CC-088
Notice Type:	Critical Contingency Termination
Notice Issued to:	Firstgas TSO
	Stakeholders listed in the CCO Information Guide
CCO Instruction to TSO:	The Critical Contingency has been terminated.
	Issue notice of Termination of Critical Contingency to Large Consumers and Retailers within 30 minutes and ensure an appropriate critical notice is posted on OATIS and direct retailers to advise their consumers that the critical contingency has been terminated.
Critical Contingency Termination Time & Date:	26 September 2024 02:30am
Current Status:	The transmission system is stable. The gas supply into the Mount Maunganui gas gate has been restored.
Event that caused Critical Contingency:	The gas supply to the Mount Maunganui gas gate became blocked causing a breach of the critical contingency pressure threshold.
Details of Event resolution:	Firstgas has cleared the blockage and supply has been restored.
Regional Critical Contingency Status:	Regional
Transmission pipeline(s) affected:	The Firstgas Bay of Plenty Pipeline
Geographic area affected:	Mount Maunganui

This notice is issued pursuant to **Regulation 60** of the Gas Governance (Critical Contingency Management) Regulations 2008 and amendments. All directions issued by the CCO pursuant to this declaration must be complied with.

This notice is issued in accordance with the General Critical Contingency Notice Conditions contained in the CCO Information Guide, CCO Communications Plan and First Gas CCMP.

The CCO will issue advice of this Notice of Critical Contingency Termination to the stakeholders listed in the CCO Information Guide and publish this notice in the public domain of the CCO web site at <a href="https://www.cco.org.nz/current-event/">https://www.cco.org.nz/current-event/</a>

#### Posted on oatis.co.nz:



#### Sent via e-mail:

OATIS (Maui). New Critical notice ID 77333 "Critical Contingency Declaration Notification - CC-087" - Action Required



new Critical notice has been published on the Maui IX.

ritical Contingency Declaration Notification - CC-087

lease visit the Maui IX at  $\underline{\text{https://www.oatis.co.nz}}$  for further information.

5/09/2024 11:41:37 PM

OATIS (Vector). New Critical notice ID 77334 "Critical Contingency Declaration Notification - CC-087" - Action Required



A new Critical notice has been published on the Vector IX.

Critical Contingency Declaration Notification - CC-087

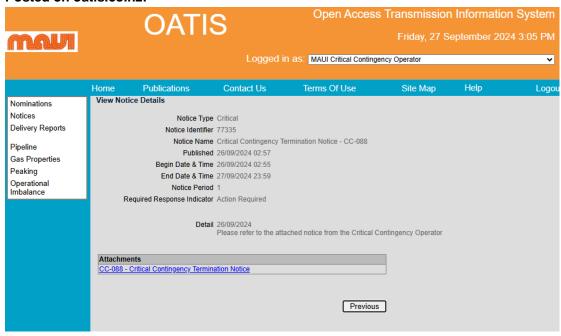
Please visit the Vector IX at <a href="https://www.oatis.co.nz">https://www.oatis.co.nz</a> for further information.

#### Sent via SMS:

Wednesday, 25 September

A new Critical notice ID 77334 "Critical Contingency Declaration Notification -CC-087" has been published on OATIS (Vector). Please visit the Vector IX at www 11:44 pm

#### Posted on oatis.co.nz:



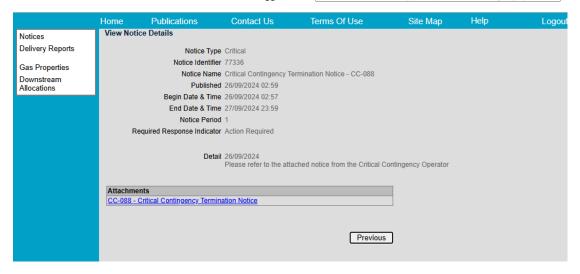
Firstgas

**OATIS** 

Open Access Transmission Information System
Vector Transmission Code (VTC)

Friday, 27 September 2024 3:05 PM

 $\textbf{Logged in as:} \ \overline{\texttt{VECTOR Miscellaneous Party (Vector) FOR Critical Contingency Operator} \quad \textbf{$\checkmark$}$ 



#### Sent via e-mail:

OATIS (Maui). New Critical notice ID 77335 "Critical Contingency Termination Notice - CC-088" - Action Required



A new Critical notice has been published on the Maui IX.

Critical Contingency Termination Notice - CC-088

Please visit the Maui IX at https://www.oatis.co.nz for further information.

26/09/2024 2:57:03 AM

OATIS (Vector). New Critical notice ID 77336 "Critical Contingency Termination Notice - CC-088" - Action Required



A new Critical notice has been published on the Vector IX.

Critical Contingency Termination Notice - CC-088

Please visit the Vector IX at  $\underline{\text{https://www.oatis.co.nz}}$  for further information.

26/09/2024 2:59:04 AM

#### Sent via SMS:

Thursday, 26 September

A new Critical notice ID 77336 "Critical Contingency **Termination Notice** - CC-088" has been published on OATIS (Vector). Please visit the Vector IX at www.oatis 2:59 am