

Fonterra Co-operative Group Limited
 Submission on Critical Contingency Management Regulations
 April 2024

Question	Comment
<p>1. Part 1: Do you have any additional/further comments relating to Part 1 (Minor changes and intended recommendations to the Minister)? Please provide comments and feedback, including whether there are additional changes that Gas Industry Co should consider</p>	
<p>2. Part 2: Do you agree with the proposed changes to the critical contingency threshold limits detailed in Schedule 1? Why or why not?</p>	<p>Fonterra recognises the importance of ensuring reliability of supply and minimising the likelihood of curtailment events.</p> <p>As we signalled in our submission in February to Firstgas on their proposed amendments to the critical contingency management plan (CCMP), any proposed changes to operating pressures must avoid increasing the risk of impacts to industrial users' operations.</p> <p>As a manufacturer of perishable milk products and given the seasonal nature of our operations, with milk arriving daily and in large volumes at peak, any disruption will have a significant impact. [Redacted]</p> <p>For this reason, Fonterra supports the lowering of the CCM trigger limits but does not support lowering of the pipeline operating pressures, as we are seeking to extend the regulated critical time threshold from five hours to ten hours in some cases.</p> <p>To date Fonterra has not seen a justifiable end user business case to warrant the opportunity to extend the safety margin.</p>
<p>3. Do you agree with Gas Industry's view regarding the exclusion of gas gates operated at distribution pressure <20? Why or why not?</p>	<p>Yes, these smaller lines can be managed on an event basis.</p>
<p>4. What is your general view on the issue?</p>	

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5. Part 3: Do you agree with the recommended changes to the critical contingency threshold limits to remove the Broadlands and Taupo gas gates? Why or why not?	Yes, this line can be managed on an event basis.
6. What is your general view on the issue?	