



## Critical Contingency Operator (CCO)

### Performance Report Feedback Form

The recent critical contingency incident on the gas transmission system caused by a gas escape from the Maui pipeline was declared at 01:25 on Tuesday 25 October 2011 and terminated at midday on Sunday 30 October 2011. The CCO has completed and published an incident report on 04 November 2011 as required by r64 the Gas Governance (Critical Contingency Management) Regulations 2008 (the Regulations). A copy of the incident report can be obtained from the publications section of the CCO website <http://www.oatis.co.nz>. The report was prepared in consultation with the Transmission System Owners (TSOs) – Vector and MDL.

Under r65 the CCO is also required to prepare and publish a performance report. The Regulations require the performance report to:

- assess the CCO's and Transmission System Owners' (TSO) compliance with the Regulations and the effectiveness of the TSOs' critical contingency management plans (CCMPs), the CCO communications plan, and the CCO information guide; and
- assess the extent to which the CCO considers that the Regulations, the TSOs' CCMPs, the CCO communications plan, and the CCO information guide achieve the purpose of the regulations; and
- identify, where applicable, any amendments to the Regulations, TSOs' CCMPs, the CCO communications plan, and the CCO information guide that it considers would better achieve the purpose of the regulations.

I am interested to hear from gas consumers and industry participants about their experiences and perceptions of the management of the critical contingency event. All feedback will be considered and used to prepare a draft CCO Performance Report for public consultation prior to the final report being published.

In addition to the areas that the Regulations require the performance report to cover, I would welcome your comments on any aspect of how the critical contingency event was managed. To assist the feedback process I have included below a structured form focussing on key issues identified during the incident. Please provide me with your thoughts either by email at [cco@vector.co.nz](mailto:cco@vector.co.nz) or by phone at 06 759 6525 no later than **Friday 18 November 2011**. If there are aspects of your submission that are confidential, please note them as such. Confidential information used in preparing the report will not be attributed to its source.

The form is structured in four sections to assist the feedback process. Section 1 is for respondents to enter their details. Section 2 is aimed at consumers who may not have a full working knowledge of the regulatory framework and supporting detailed documents and processes. Section 3 contains general questions and section 4 includes more technical specific questions regarding regulatory reporting requirements. If you feel that some questions do not pertain to you, feel free to leave them blank.

Copies of feedback forms can also be obtained from the publications section of the CCO website at <http://www.oatis.co.nz> and from the Gas Industry Company website at <http://gasindustry.co.nz>.



## Section 1 – Respondents Details

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| Name  |  |
| Organisation  |  |
| Address   |  |
| Phone Contact                                       |  |
| Email Contact                                       |  |
| Participant Description<br>*delete where applicable | Consumer/Retailer/Shipper/TSO/Producer/Other (please specify)* |

### Notes:

- (a) **The Regulations** - 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.
- (b) **Transmission System Owners (TSOs) Critical Contingency Management Plans (CCMPs)** – these are prepared by the TSOs and include the contents defined in r25. They are approved by industry body under r30 or 31 in consultation with the CCO.
- (c) **CCO Communication Plan** – this is prepared by the CCO under r35. It governs communications between the CCO and TSOs during a critical contingency.
- (d) **CCO Information Guide** – this is prepared by the CCO under r36. It explains communication flows between the CCO and key industry stakeholders.
- (e) All of the above documents are published by the CCO and copies can be obtained from the publications section of the CCO website at <http://www.oatis.co.nz>.



## Section 2 – Consumers

**Q1** – If you are a non-domestic consumer, did you know that your gas supply could be curtailed in the event of a gas outage?

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**Q2** - Do you have business continuity and mitigation plans in place to manage gas outages?

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**Q3** - Does curtailment of your gas supply cause issues beyond the interruption of your business e.g. effects on other businesses, environmental damage or any other issues?

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**Q4** - Will the incident change your approach to managing and mitigating the effects of a gas outage? If so, how?

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**Q5** – *(if applicable)* The Regulations allow for gas retailers to designate consumers as essential service providers under particular circumstances. This provision allows gas supply to be prioritised to these consumers during gas outages. Are you aware of this provision and did it assist you in continuing to provide essential services during the outage?

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### Section 3 – General

**Q6** - Before the incident what did you know about how gas outages are managed under the Regulations? Do you feel that you now have a clear understanding?

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**Q7** - Do you feel that you have clear understanding of the different roles and responsibilities performed by the CCO, TSOs, Retailers and Consumers during a critical contingency?

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**Q8** - Were there aspects of the curtailment process and eventual restoration that went particularly well or poorly?

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**Q9** - Did you feel there was sufficient information given for you to be able to fulfil your obligations under the regulations?

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**Q10** - Do you have suggestions on how critical contingency management could be improved?

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**Q11** - Please include any other comments or observations you would like to make in relation to the impact of the incident, the Regulations, supporting plans, communications and processes.

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#### Section 4 – Regulatory Reporting Requirements

**Q12** - Please provide an indication of your assessment of the CCO and TSOs' compliance with the Regulations.

**Q13** - Where you consider there has been non-compliances by any party having obligations under the Regulations, please describe these non-compliances, together with reasons.

**Q14 - The Regulations**

**Q14 (a)** - Please provide an indication of your assessment, together with reasons, of the effectiveness of the Regulations

**Q14 (b)** - Please provide an indication of your assessment, together with reasons, of the extent to which the Regulations achieve the purpose of the Regulations.

**Q14 (c)** - Please advise, together with reasons, whether you consider that amendments to the Regulations are required in order to better achieve the purpose of the Regulations.

**Q15 – TSOs CCMPs**

**Q15 (a)** - Please provide an indication of your assessment, together with reasons, of the effectiveness of the TSOs CCMPs.

**Q15 (b)** - Please provide an indication of your assessment, together with reasons, of the extent to which the TSOs CCMPs achieve the purpose of the Regulations.

**Q15 (c)** - Please advise, together with reasons, whether you consider that amendments the TSOs CCMPs are required in order to better achieve the purpose of the Regulations.

**Q16 – CCO Communication Plan**

**Q16 (a)** - Please provide an indication of your assessment, together with reasons, of the effectiveness of the CCO communications plan.

**Q16 (b)** - Please provide an indication of your assessment, together with reasons, of the extent to which the CCO communications plan achieves the purpose of the Regulations.



**Q16 (c)** - Please advise, together with reasons, whether you consider that amendments to the CCO communications plan are required in order to better achieve the purpose of the Regulations.

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**Q17 – CCO Information Guide**

**Q17 (a)** - Please provide an indication of your assessment, together with reasons, of the effectiveness of the CCO information guide.

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**Q17 (b)** - Please provide an indication of your assessment, together with reasons, of the extent to which the CCO information guide achieves the purpose of the Regulations.

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**Q17 (c)** - Please advise, together with reasons, whether you consider that amendments to the CCO information guide are required in order to better achieve the purpose of the Regulations.

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