

10 August 2018

Paul Swain
Independent Chair
New Zealand Utilities Advisory Group Inc
PO Box 25 414
WELLINGTON 6146

Sent via website: <http://nzuag.org.nz/code-review/>

Dear Paul

Review of the national code of practice for utility operators' access to transport corridors (second submission round)

First Gas welcomes the opportunity to make a second submission on the “*National Code of Practice for Utility Operators' Access to Transport Corridors*” (the Code).

We appreciate the robust review process undertaken by the New Zealand Utilities Advisory Group (NZUAG). The workshops have provided a useful forum to increase understanding of the current code and the review underway.

First Gas has reviewed the marked-up version of the Code and has no further comment on the proposed changes. The remainder of our submission focusses on the key points of interest to our business.

About First Gas

First Gas operates 2,500km of gas transmission pipelines (including the Maui pipeline), and more than 4,600 km of gas distribution pipelines across the North Island. These gas infrastructure assets transport gas from Taranaki to major industrial gas users, electricity generators, businesses and homes, and transport around 20 percent of New Zealand's primary energy supply.

Our distribution network services 62,670 consumers across the regions of Northland, Waikato, Central Plateau, Bay of Plenty, Gisborne and Kapiti. For further information on First Gas, please visit our website www.firstgas.co.nz.

Increased awareness of the Code would improve efficiency

First Gas supports the principles of the Code and view this as a key document for the planning of utility placement across New Zealand. We believe the Code increases efficiency for utility operators as it ensures we understand the requirements and timing for utility work, when considering using a road or railway reserve.

For it to be effective, those accessing the transport corridors must have knowledge of the Code and its requirements. We suggest that the NZUAG continue to hold educational workshops from time to time in a similar manner to those held for this review of the Code. We have found the workshops a useful forum to widen understanding and potentially raise the awareness of the Code throughout the industry.

We consider that broader education may help resolve some concerns that—

- Those accessing transport corridors are not aware of the Code
- Mandatory attendance of regional coordination meetings and liaison meetings is not understood.

Code awareness

We have had some experience where contractors have been unaware of the Code and its contents. Whilst we consider that corridor managers and utility operators should continue to raise awareness through their day to day business, this could be supported by education initiatives led by the NZUAG.

Awareness attendance of regional coordination meetings and liaison meetings

We consider participation at the corridor manager regional coordination meetings and liaison meetings essential to the success of the Code. These meetings are necessary to successful forward planning as they provide visibility of works and planning from all stakeholders and provide networking opportunities. While attendance is mandatory under the Code, this may not be well known affecting attendance numbers.

The meetings, and the liaison meetings provide opportunity to discuss areas that could improve efficiencies within the Code. For example, the NZUAG in their consideration of the first round of submissions to this Code review¹ have suggested that consistency in the application of the templates in the Code is a matter better discussed at liaison meetings.

In our initial submission this Code review², we noted our concern that the regional co-ordination meetings do not appear to be occurring across all regions. The NZUAG reminded us that the Code already made attendance at these meetings mandatory. It would be beneficial if the NZUAG included discussion of these meetings in any educational workshops or promotions initiated by the NZUAG.

New tools should be recognised in locating existing underground structures

Section 5.2 of the Code sets the process for locating existing underground utility services. We consider this section could be improved with reference to such tools as the *beforeUdig*³ service.

The *beforeUdig* online service enables anyone undertaking excavation works to obtain information on the location of cables, pipes and other utility assets in and around any proposed dig site.

This service, if referenced for consideration in section 5.2 of the Code would provide parties seeking to locate existing underground structures a reminder that there is a service that can provide information on asset location.

Depths of services must abide by other legislated specifications

We agree with NZUAG that while it would be ideal to define a national standard for the minimum depths of service for the respective utility services, it will be difficult to achieve. The NZUAG approach to recommend lay positions be agreed and published when possible seems pragmatic. First Gas would welcome further discussion on this matter but caution that any discussion must consider other legislated requirements utility providers must meet. For example, pipe depths is already governed Part 3 of the New Zealand industry standard for Gas Distribution Networks, AS/NZS4645.3: 2018.

Contact person

If you have any questions regarding this submission, please contact me on (06) 215 4046 or via email at Lynette.taylor@firstgas.co.nz.

Yours sincerely



Lynette Taylor
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¹ Refer <http://nzuag.org.nz/wp-content/uploads/2018/07/Code-Review-Round-1-collated-submissions-with-commentary.pdf>, point 24 on pages 41-44

² Refer http://firstgas.co.nz/wp-content/uploads/First-Gas-submission_NZUAG-code-review.pdf

³ Refer <https://www.beforeudig.co.nz/nz/home>