

Working Together: Lifeline Utilities & Emergency Management

DIRECTOR'S GUIDELINES FOR LIFELINE UTILITIES [DGL 3/02]



Te Rākau Whakamarumarū

**Ministry of Civil Defence
& Emergency Management**



Working Together: Lifeline Utilities and Emergency Management Director's Guidelines for lifeline utilities (DGL 3/02)

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Authority

This document has been issued by the Director of the Ministry of Civil Defence & Emergency Management pursuant to Section 8(2)e of the CDEM Act 2002, to assist lifeline utilities and local government emergency management cooperation and coordination.

The Ministry consulted substantially with lifeline utilities, the national and regional Lifelines Group/s, local government representatives, Local Government New Zealand, and the emergency services in producing this document (DGL 3/02).

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Ministry of Civil Defence & Emergency Management
PO Box 5010
Wellington
New Zealand
Tel: +64 4 473 7363
Fax: +64 4 473 7369
Email: emergency.management@dia.govt.nz
Website: www.civildefence.govt.nz



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Foreword



John Norton
Director

New Zealand is considered to be a great place to live. Our enviable reputation rests on assumptions such as continued protection of the environment and maintenance of levels of personal safety. We assume that the utilities supplying our essential services are capable of withstanding the effects of disasters. We share an expectation that government, the emergency services and lifeline utilities are working together to minimise the impacts of disasters.

Parliament has enacted the Civil Defence Emergency Management Act 2002, with a commencement date of 1 December 2002, repealing and replacing the Civil Defence Act 1983. The new Act seeks to improve New Zealand's resilience to emergencies through promoting a comprehensive, all-hazards approach to managing risk.

The Act requires key agencies (including lifeline utilities) to be able to continue functioning to the fullest possible extent during and after an emergency, albeit this may be at a reduced level. This document reflects the expectations around that requirement for utilities. It has been prepared through extensive consultation with utility and local government personnel whose input has been greatly valued.

Expectations of lifeline utilities under the new Act are clearly identified in this document. The focus is on business continuity planning and planning to ensure essential services are continued or restored to key facilities and customers on a priority basis. Fortunately many New Zealand utilities practice sound risk, asset and emergency management and cooperate through arrangements such as Lifelines Groups. For these, the benefits of CDEM planning across sectors and for a range of hazards will be apparent and achievable.

The Ministry will provide guidance and assistance in achieving these expectations. Local government's CDEM planning will include lifeline utilities, whilst utilities themselves are expected to achieve a level of organisation within their sector as well as individual capability.

I am pleased with the positive attitudes and commitment from lifeline utilities that the Ministry has worked with in producing this guideline, and look forward to our working together to develop a resilient New Zealand society.

A handwritten signature in green ink that reads "John Norton".

John Norton
Director: Ministry of Civil Defence & Emergency Management

Overview for CEOs

When disasters such as floods, earthquakes, wildfires or terrorist attacks unfold in the media, our natural tendency is to breathe a sigh of relief that we have not been directly affected. Usually we fail to heed the warning these events provide, by asking:

Am I confident that my organisation could survive a major emergency?

New Zealand has decided to improve its resilience to emergencies by introducing major changes to the way in which every sector of society approaches civil defence emergency management. Lifeline utilities are expected to play a significant role in this process by strengthening relationships within and across sectors, and by individually committing to actions that ensure continuity of operation and response to customers during disasters.

Obligations to shareholders and customers to plan for, and ensure, continuity are reinforced by the Civil Defence Emergency Management (CDEM) Act 2002's clear message – utility organisations are required to be capable of managing the impacts of disasters – **it is not an option to be unprepared.**

The Act does not impose new business requirements or alter responsibility for risk, asset and emergency management. The emphasis is on ensuring utilities provide continuity of operation, particularly where their service supports essential CDEM activity. This can only be achieved by cooperative planning between utilities, local government and the emergency services to ensure that plans are effective, thereby minimising loss and hastening a return to business.

As the chief executive of a lifeline utility, your answers to these questions indicate if you view your utility as 'capable' under the CDEM Act 2002 - *can function to the fullest possible extent during and after an emergency.*

If your answers give rise to concern, ask your risk, asset or emergency manager to study this document in detail and report on the action required.

Does your continuity planning address risks posed by external threats, such as from contractors or other utilities upon which you are dependent?

Do your operations staff have working relationships with central/local government and emergency services that will be effective during an emergency?

Are there mutual support arrangements with other utilities to assist in your survival?

Do you feel your sector's response to a major event will be coordinated and thus protect the marketplace?

Can you ensure continuity of services required for essential health, police, fire and local government CDEM activity?

CEO	
✓	✗

When enacted, your utility will be affected by, and can benefit from the CDEM Act 2002. Local authorities and emergency services within regional boundaries will form CDEM Groups. These Groups will work together with your staff to develop sound plans for regional-scale disasters. You may also be asked to contribute towards developing a National CDEM Strategy and Plan. The effectiveness of this cooperative planning will be monitored at both regional and national levels.

These processes will help forge relationships that strengthen our communities' resilience towards disasters whilst at the same time supporting the continuity of your business.

Key Messages

Expectations of your organisation, your sector and your region are summarised below. When working towards these expectations it is important that:

- senior management buy-in is obtained – especially agreement to work across the sector within the bounds of competition
- risk management and continuity planning are promoted as core business – responsibility cannot be transferred to customers or consultants
- cross-utility communications and relationships are established to support your organisation's survival.

Every lifeline utility, the Ministry of Civil Defence & Emergency Management and all CDEM Groups are expected to develop cooperative processes to ensure the following expectations are met.

Your Utility Should

- Plan for and be able to implement procedures to ensure continuity of business and response to customers – it is not an option to be unprepared.
 - Understand the full range of hazards that could impact on your operation. Consider external risks, including dependence on utilities from other sectors and outsourcing arrangements.
 - Validate risk assessment by interaction with external agencies and exercising plans – not through assumption.
 - Forecast a hierarchy of external demand in consideration of CDEM-critical activity. Agree disconnection and restoration priorities with CDEM Groups (do not await imposition of force-majeure post-CDEM Groups invoking emergency powers).
- Establish planning and operational relationships with CDEM Groups.
- Join, participate in, and benefit from regionally focused utility activities such as Lifelines Groups.

Your Sector Should

- Ensure utilities plan across the sector to optimise service during emergencies.
 - Establish mutual aid mechanisms to address individual shortages in resources or personnel.
 - Protect continuity of operations and supply. For some sectors this may involve purchasing options that protect hedge contracts.
 - Develop sector based contracts that provide access to alternative supply.
 - Have an ability to reconfigure operations or networks to cater for loss of assets.
 - Ensure reconfiguring or load shedding mechanisms enable continuance of supply to CDEM-critical facilities.
 - Ensure that conditional supply arrangements take account of the necessity of CDEM prioritisation during emergencies.

- Provide essential cross-utility sector organisation in order to be seen as capable.
 - Reach accord over common approaches to reduction, readiness and response activities thus protecting your marketplace.
 - Share and apply examples of best practice that protect resources.
 - Determine how the sector communicates/distributes information between utilities during an event, to authorities for emergency management and to the public.
 - Seek accord or consensus on sustainable development of resources.

When Established - Your Region's CDEM Group Should

- Identify utilities required to be involved in development of regional CDEM planning arrangements.
- Develop an activity programme (minimising demand placed upon utilities) to achieve:
 - CDEM Group understanding of existing individual utility continuity planning
 - utility/utility and cross-sector understanding of CDEM arrangements
 - examination of the Group's hazard prioritisation and scenarios including lifelines vulnerability analysis
 - review of respective roles and interdependencies in these scenarios
 - identification of gaps in reduction, readiness, response and recovery
 - agreement on means of addressing any gaps.

The Civil Defence Emergency Management Act 2002

Background to The Act

New Zealand's lifeline utilities have to cope with the challenges posed by a broad range of natural and technological hazards.

Flooding has been New Zealand's most costly natural hazard, causing an average NZ\$125¹ million damage per year. Potentially the most dangerous natural hazard is earthquake, especially for large urban centres such as Wellington and Christchurch, whilst the most underrated natural threat for northern regions comes from volcanic eruption. Exposure to technological and other man-made hazards – such as the 1998 Auckland power crisis – is increasing as growing urban populations put pressure on inadequate infrastructure and levels of technology become ever more complex.

In addition, industry deregulation in telecommunications, transport, energy and other lifeline sectors has generally resulted in dispersion of lifeline services into individual components that may not function in a coordinated, cross-sectoral manner. While a commercially focused approach has enhanced financial risk management, often the same cannot be said for physical risk management.

Following a series of reviews, New Zealand has determined to improve the ability of emergency management sectors to manage hazards, respond to and recover from disasters, and to better coordinate limited resources. The importance of this for utilities is heightened following the utility sector reforms of the past 15 years. Improving New Zealand's CDEM regime will include:

- strengthening relationships between sectors and agencies involved in CDEM activity
- encouraging cooperative planning for continuity of service and contribution to disaster response
- seeking commitment to deliver more effective risk management; especially risk reduction through a range of policy and planning initiatives.

Making New Zealand Resilient

Parliament has enacted the CDEM Act 2002 ("the Act"), to repeal and replace the Civil Defence Act 1983. The Act is supported by a vision of:

Resilient New Zealand – strong communities, understanding and managing their hazards.

The Act requires a risk management based approach to the sustainable management of hazards, both natural and man-made. This risk management process is applied across risk reduction, readiness, response, and recovery, as well as being integrated through the involvement of all sectors within the wider CDEM community. The Act's stated purposes include:

- improving and promoting sustainable hazard management to improve safety of the public and property
- encouraging communities to achieve acceptable levels of risk
- requiring local authorities to coordinate CDEM planning and activity
- ensuring integration of national and local CDEM planning
- encouraging CDEM coordination across a wide range of agencies that prevent or manage emergencies.

¹Ministry for the Environment: *The State of New Zealand's Environment* 1997 (Ch7.16) – Govt Press NZ

The Importance of Lifeline Utilities

Lifeline utilities are defined in Schedule 1 of the CDEM Act 2002 (see **Annex B**) either by specific entity name or class, and include:

Specific entities

- Radio New Zealand and Television New Zealand Limited
- International or primary airport authorities (as named)
- Port companies (as named)

Classes of entity

- Production, supply or distribution of manufactured or natural gas (either via networks or bottles greater than 20kg)
- Generation or distribution of electricity through a network
- Supply or distribution of water to inhabitants of a city, district or place
- Provision of a waste-water or storm-water network
- Provision of a telecommunications network
- Provision of a rail or road network (including state highways)
- Production, processing, or distribution of petroleum energy products or essential motor or machinery lubricants to retail outlets and bulk customers

Within these broad categories, lifeline utilities may be further characterised as:

- *national*, eg, telecommunications, energy transmission, road, rail, broadcast media
- *regional* (or trans-regional), eg, lines companies, airports and ports
- *local*, eg, water and waste-water

In a civil defence emergency, safety of life issues will always be given first priority. The economic viability of communities, and of the nation as a whole, however, depends upon the continued operation of lifeline utilities. It is essential lifeline utilities are resilient to emergencies and that their emergency planning is integrated with the wider community's CDEM planning, so that both are effective. Effective planning can only be assured through sound relationships between utilities, and with local government and the emergency services. **People make the difference, not plans.**

Cooperative Planning

Business and industry have always been required to contribute to the civil defence effort under the *National Civil Defence Plan*. Consultation with 14 regionally focused CDEM Groups will streamline this effort and make it more effective. Existing Civil Defence plans and arrangements continue to be operative until approval of new CDEM plans.

Utilities participating in cooperative CDEM planning are realising a range of benefits such as:

- access to shared hazard and risk analysis data
- access to community leaders – the decision-makers in times of crisis
- an ability to coordinate mitigation programmes
- understanding how other utilities respond and using this information to integrate planning activity.

One way to ensure the survival of your business under adverse circumstances is to establish sound relationships with other utilities, local government and emergency services. Irrespective of legislation, cooperative planning for continuity of operation makes sound business sense.

Responsibilities of Lifeline Utilities

Lifeline utilities have a significant CDEM role to play in New Zealand. Lifeline utilities are responsible for strengthening relationships within and across sectors, and individually committing to actions that ensure continuity of operation and delivery of service, particularly to essential CDEM activity during and after an emergency. A resilient New Zealand is one in which all lifeline utilities²:

- function at the fullest possible extent during and after an emergency
- have plans for such functioning (continuity) that can be made available to the Director of the Ministry of Civil Defence & Emergency Management if requested
- participate in CDEM planning at national and regional levels where requested
- provide technical advice on CDEM issues where reasonably required.

Explained in the following pages



1 Function to the Fullest Possible Extent

1.1 Planning to be able to function

The Act reinforces the view that it is not an option to be unprepared. The legislation requires that lifeline utilities are “able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency” – an expectation of **being capable**. Through this requirement, the Act reflects the commercial realities of private utilities, and the community expectations or performance requirements of public utilities.

The Act does not alter the scope or scale of utility business, nor shift any responsibility. Utility managers will continue to determine risk, asset and emergency management processes and thus the level at which a utility is able to function during and after an emergency. It is, however, the Ministry’s role to provide guidance on the expectation of what it means for a lifeline utility to be capable.

Key Message

Lifeline utilities are expected to plan for and be able to implement procedures to ensure continuity of service to the fullest possible extent – it is not an option to be unprepared.

A continuity plan, particularly if developed in isolation, does not ensure capability. The relationships and understandings developed through cooperative planning are as important as the plan itself. A risk management process must therefore promote effective relationships. The Act introduces the concept of regional CDEM Groups (see p11 and **Annex C**) to promote understanding of respective risk management practices.

The Act requires that lifeline utilities function at the fullest possible extent during and after an emergency. The “fullest possible extent” means what is possible in the circumstances, so cannot be specified in absolute terms – some events could put a utility totally out of action. A key goal is that the loss of any single utility does not result in a cascade failure for other utilities or sectors. Measures of the fullest possible extent could include:

- strong relationships
- sound risk management
- identification of the likely physical impact of particular hazards on systems
- identification of additional capability to call on in case of emergency.

²CDEM Act 2002 section 60

2 Have Plans for Continuity

2.1 Provision of risk management and continuity information

Lifeline utilities are expected to make available to the Director of the Ministry of Civil Defence & Emergency Management their plans for functioning during and after an emergency, if requested. Such plans are protected from disclosure for purposes other than those authorised under the Act. It is unlikely the Director will exercise this ability, however, as utilities are expected to voluntarily enter into cooperative planning because of the benefits.

While all participants expect to understand each other's responsibilities and roles during emergencies, such cooperation does not require disclosure of commercially sensitive material. Rather, cooperative planning means sharing relevant aspects of risk and continuity planning such as:

- hazard analysis and operational consequences (eg, network locations and hazard overlays)
- demand/restoration hierarchy, including how services sustain CDEM-critical activity and other utilities
- emergency response and recovery arrangements for response coordination.

2.2 Monitoring and review of plans

Commercial or performance imperatives drive utilities' approaches towards ensuring their ability to continue functioning in the face of competition or disaster and each lifeline utility is expected to monitor its own plans. The Ministry, however, intends to monitor the effectiveness of cooperative planning by reviewing progress of regional level CDEM Group planning activity. Audits would only be required where specific sector issues or weaknesses are identified and require external attention. Possible scenarios under which the Director may require an audit are:

- if Government has expressed concerns over preparedness of a specific utility sector to a particular risk
- if a CDEM Group is unable to express confidence in its Group Plan due to concerns over a utility's inability to continue to provide a CDEM-critical service in a particular emergency
- if a utility refuses to engage in Plan development and the CDEM Group has sought the Ministry's assistance to enforce the Act.

Key Message

Plans for functioning (continuity) should be backed by sound relationships and ensure:

- external risks are considered, such as failure of interdependent utilities or outsourcing arrangements
- the consequences of emergencies are understood along with responsibilities and roles within and across sectors
- the priority and scope of service demand during emergencies has been forecast and accounts for CDEM-critical activity
- plans for continuance of operation are in place and routinely exercised.

3 Participate in CDEM Planning

Whenever a cooperative activity occurs the participants naturally expect to know beforehand: “How will this happen?” and “Who pays?”.

In the main, costs lie where they fall (see **Annex A** for further information). Whilst a similar risk management process is to be followed at national and regional levels, outcomes and workloads vary dependent upon:

- the number of regions a utility’s customer base encompasses and whether it provides a national service
- adequacy of existing planning and operational arrangements
- any new regional CDEM plan development work achieved to date
- CDEM Group risk prioritisation outcomes determining when utility issues are to be addressed in the planning process.

Lifeline utility involvement with CDEM planning at the national level (with the Ministry of Civil Defence & Emergency Management) and/or with regional CDEM Groups will be a progressive process.

Pre-plan meetings: CDEM planners meet individually with utility risk/asset managers to précis the utility’s existing arrangements across the 4Rs for input to the CDEM plan hazard prioritisation process.

Plan workshop/s: Utility representatives across sectors assist CDEM staff to:

- examine scenarios and hazard prioritisation
- review respective roles and interdependencies in these scenarios
- identify gaps in reduction, readiness, response and recovery arrangements
- agree processes or means of addressing any gaps.

Individual utility follow-up activity: Each utility then addresses the gaps as agreed (eg, through establishing mutual aid agreements, retrofitting assets to improve reduction, etc).

Ongoing relationships: Longer-term exercising of plans and updating of arrangements such as operational contact information, as well as exchange of best practice across the 4Rs.

A utility’s workload can be significantly reduced if it has available a précis-format continuity plan which includes consideration of external interdependencies. For national utilities this précis would include identifying regional variations.

Lifeline utilities are therefore expected to participate in cooperative planning relationships:

- 3.1 between utilities; within and across sectors
- 3.2 at the regional (CDEM Group) level
- 3.3 at the national level.

PTO

Explained in the following pages



3.1 Inter-utility relationships

New Zealand's commercial environment is not generally conducive to cooperation and coordination within, or between, utility sectors. Whilst not serving to restructure utility sectors, one of the potential benefits of the new Act is the promotion of inter-utility relationships. The expectation is that utilities recognise the benefits of cooperation and participate in sector-based CDEM planning and activity – particularly at the regional level.

Key Message

Every lifeline utility:

- is expected to develop inter-utility arrangements within its sector
- should participate in cross-sector regionally based activity

While not every sector has a formal body that can represent its interests, utilities within various sectors can benefit from sector-based activity through such organisations as:

- The Gas Association of New Zealand www.ganz.org.nz
- New Zealand Water and Wastes Association www.nzwwa.org.nz

Example: Cooperative Agreements

Mutual Aid Plan for the Natural Gas Industry

In 1996 the Gas Association developed a Mutual Aid Plan (MAP); an agreement that gas companies will assist each other to recover from a major incident and to restore supplies as quickly as possible – thus protecting the overall market.

The MAP covers pre-planning, assistance provision and a code of cooperation. The plan is one of a range of sector documents addressing gas emergencies that include a national gas outage contingency plan and individual company emergency response plans.

The MAP's production and management is funded by annual subscriptions. Each member commits to the MAP by signing a deed. The MAP is to be regularly assessed and improved through tabletop and practical exercises.

For more information see www.natgas.co.nz



Maui Gas Platform

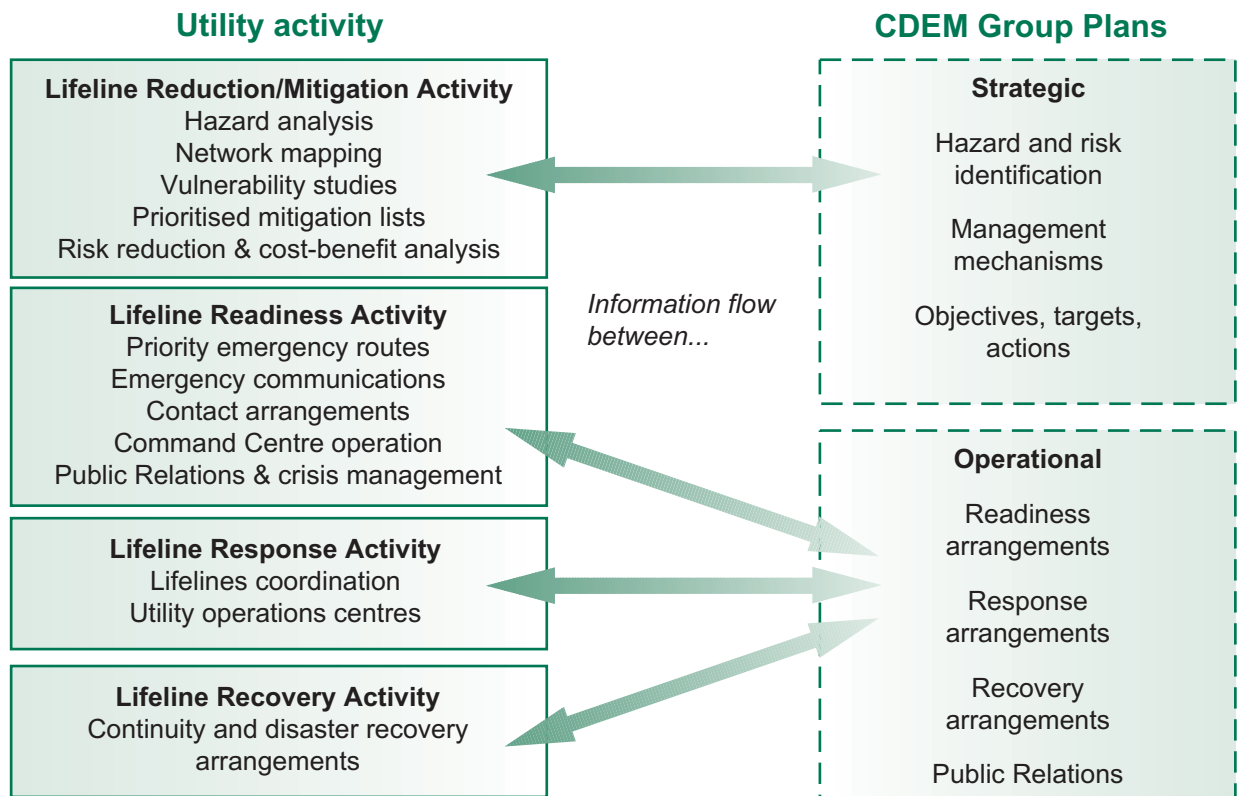
3.2 Regional/CDEM Group relationships

One of the key aspects of New Zealand's new CDEM regime will be the establishment of regional CDEM Groups – consortia of local authorities working in partnership with emergency services, utilities and others to deliver CDEM within regional boundaries. Regional councils will be appointed as administering authorities for CDEM Groups. The Groups comprise elected councillors from local authorities and representatives from the emergency services (police, fire, health). While not mandated to specific appointments, lifeline utilities are essential members of CDEM Groups. More details on CDEM Group structure and activity are provided in **Annex C**.

CDEM Groups have two years from their formation in which to develop regionally focused plans. These plans will not require commercially sensitive information relating to a lifeline utility's operations. Rather, the plans focus upon identifying hazards and risks in the area, and determining objectives, targets and actions to address them. The various parties (including lifeline utilities) must agree targets and actions they relate to.

CDEM Groups may seek to use established Lifelines Groups to coordinate the reduction and readiness aspects of the planning input. Details on how to participate in and benefit from Lifelines Groups are provided at **Annex D**.

The likely flow of information between utility activity and CDEM Group plan development is represented below.



If regional arrangements are sound, utility input to CDEM Group Plans may be limited to participating in one or two workshops and providing specific contingency information for reference or inclusion in the Plan.

Alternatively, where relationships and plans do not exist to address major events, significant collaborative effort will be required. In either case, individual utilities are responsible for undertaking their own risk reduction and readiness activity.

National utilities may also be represented in regional CDEM Groups where requested – even if the utility does not have a representative within that regional boundary its national strategy and operational response plans may still be a part of the CDEM Group’s planning.

It is important to re-emphasise that the focus of this process is upon sharing information and gaining understanding of respective arrangements. It does not necessarily require the transfer of plans or documentation. The relationships and understandings developed through cooperative planning are arguably more important than the plan itself.



“In preparing for battle, I have always found that plans are useless, but planning is indispensable.”

Dwight D. Eisenhower

3.3 National relationships

Utility involvement is essential in developing an effective National CDEM Strategy, a National CDEM Plan, and readiness arrangements to meet both government and lifelines' expectations of the nation's capability.

The new National Strategy and Plan are to be developed by the Ministry within one and three years respectively following the Act's commencement. The consultative processes will include specific stakeholder groups (including lifeline utilities), as well as general public consultation.

National CDEM Strategy

The National Strategy sets out the Crown's CDEM goals, objectives to achieve these goals, and measurable targets and actions. The strategy is directed at Crown agencies and has no direct actions for lifeline utilities compliance. The strategy is likely to promote continuity planning – an expectation that has already been established under the Bill for lifeline utilities.

Lifeline utilities individually, as sectors, or through Lifelines Groups, have a unique opportunity to influence the Crown's CDEM direction through being part of a focus group or via individual submissions. The level of such voluntary participation depends upon the utility's interests, or may be reasonably required by the Director of the Ministry of Civil Defence & Emergency Management for lifeline utilities whose input is deemed to be crucial to the strategy's success.

National CDEM Plan

The development of a National CDEM Plan builds upon, but does not duplicate, regional CDEM Group planning. The extent of participation that the Director may reasonably require is that where requested national and to a lesser extent some regional lifelines, either individually or as represented by sector groupings, participate in a focused series of workshops that:

- define consequences of potential national hazards
- clarify responsibilities and roles for reduction, readiness, response and recovery actions.

A note for national utilities

Utilities that provide a service with national implications can expect to be involved in both CDEM Group (regional) as well as national level activity. The Ministry, and CDEM Groups, are conscious of utility concerns regarding workloads. These concerns can be lessened by:

- national utilities developing a consistent approach through:
 - preparation of a standard précis format continuity plan, plus regional variations
 - use of the same senior representatives wherever possible
- a natural stagger of plan development occurring across CDEM Groups as a matter of course
- development of a National CDEM Plan following CDEM Group planning as indicated under the Act.

4 Provide Technical Advice

4.1 National advice

The Ministry operates a National Emergency Operations Centre (NEOC) in Parliament Buildings to provide Government with the ability to monitor, assist with or manage an event according to its severity. During an emergency of national significance, the NEOC may call together a pre-determined group of lifeline advisors to assist with decision-making. The Director may call upon any lifeline utility during such an event to provide specialist technical advice.

4.2 Regional advice

Utilities (national, regional or local) may also be asked by CDEM Groups to provide technical advice free of charge. Such requests are likely to arise in two ways:

- Utility input to the CDEM Group Plan development process as discussed in the preceding pages of this document. The emphasis on gaining mutual understanding of each other's risk management arrangements and how the agencies involved in the Group Plan may work together to address residual risk.
- Technical advice to operational staff within a CDEM Group during response to an emergency (eg, confirmation of restoration priorities, timings and processes, and advice as to the success of alternate planning).

Key Messages

Where requested by the Ministry or CDEM Groups, utility representatives are expected to assist in:

- reviewing the consequences of national or regional hazards
- clarifying responsibilities, roles and coordination of activity.

Last note: World Trade Centre

Lessons from Sep 11 2001

1. Many companies have realised that insurance on its own will not ensure business continuity in the event of a major loss.
2. Business continuity planners should raise the bar on their organisations' contingency plans by asking senior management to redefine what they consider to be the worst-case scenario they may have to face.
3. A thorough business continuity plan should take into account the relationships an organisation should already have in place with government organisations, law enforcement, emergency personnel, vendors, and industry peers.
4. We need to share information quickly with industry peers to potentially avert a disaster, or to contain or mitigate it.
5. Ultimately, people are what make organisations function, and they must be made top priority.

Key points from an article in the Sep/Oct 2001 edition of *'Contingency Planning & Management'*. For more information (including full transcript) see www.ContingencyPlanning.com



Annex A – Frequently Asked Questions

Q: *Who pays?*

A: Costs lie where they fall. Operational continuity planning should already be in place for all lifeline utilities as sound business practice. Any submitter will meet costs of making optional submissions on the National Strategy. The Ministry has, for many years, followed a policy of meeting direct travel costs but not reimbursing for staff time. Therefore, Ministry-convened utility focus groups for the National CDEM Strategy or Plan will be reimbursed for direct costs, with lifelines expected to make the appropriately qualified representative's time available. It is recommended that CDEM Groups follow a similar practice. Clearly there is room for negotiation to suit local circumstances within this guidance. This approach ensures that the Ministry and CDEM Groups are sensitive to keeping demands to the minimum and there is an emphasis on focused, quality workshops. Section 60(d) of the Act states that technical advice (representative's time and professional expertise) is expected to be provided by utilities free of charge where reasonably requested.

Q: *Will the definition of lifeline utilities in Schedule 1 change and can exemptions be made?*

A: Yes. Section 61 of the Act makes provision for the Governor-General, on the recommendation of the Minister of Civil Defence, to alter the description of classes of lifeline utility if required. The Ministry is to develop a process and prioritise the order of groups to be addressed. When the Ministry provides certification to the Executive Council of Government, this is taken to include confirmation of consultation and proper representation of the views of affected parties.

The definition of lifeline utilities is focused on the prime provider of an essential service, not the supporting or secondary services. The essential services (water, energy, etc) are the focus as opposed to those agencies or sectors that underly the infrastructure (quarries, earthmoving, construction, etc). The onus is upon the primary provider, who in turn puts in place arrangements or contracts to ensure the supporting industry will be available to assist its ability to continue to function.

The Act allows a flexible approach, which can take account of structural change among lifeline utility businesses. Businesses can be added or removed from the list of lifeline utilities as necessary and, where a condition is inappropriate for an individual operator, exemptions can be made. Section 62 of the Act allows the Minister of Civil Defence to make any organisation which falls within the definition of "lifeline utility" exempt from the provisions of Section 60.

Q: *How will the national representation of sectors (eg, energy) be obtained?*

A: Every utility is responsible for ensuring effective planning within its sector to make it capable. Internal adoption of cooperative processes and benefits tempered by commercial reality is always preferable to externally imposed regulation. The Act's planning processes will serve to foster sector cooperation, however the Ministry does not have the mandate or experience to attempt to establish sector representation for all lifeline utilities. The Ministry also promotes national and regional lifeline group processes and continues to see such informal, voluntary vehicles as further means of promoting utility sector cooperation.

Q: *How does the requirement to have an ability to function during and after an emergency relate to force majeure sections in existing service contracts?*

A: Utilities do not usually accept a contractual commitment to deliver an uninterrupted or perpetual service. If the service is provided it is to be paid for, but the utility is not committed to the supply. Differing levels of service would be established by what the utility did, not what a court established. In relation to duty and force majeure – the requirement is to make preparations to be able to function, albeit at a reduced level, during and after an emergency. Given that some emergencies have the potential to completely destroy a utility, clearly a test of reasonableness could be placed against the nature and scale of the emergency in relation to the utility’s ability to prepare and therefore the relevance of force majeure.

Q: *If the Director requests continuity planning documentation, how soon should it be supplied, who pays, how will the costs be controlled, and what right of appeal exists if the costs are considered excessive?*

A: Maintaining continuity plans is viewed as a core lifeline utility business activity. The distribution costs for a single copy to the Director if requested are marginal. If a utility believed the Director’s written request for a plan under section 60(b) to be unreasonable, it could initially refuse to provide the plan. The Director then has the power to require the plan under section 76 and the utility has the right to appeal to a District Court for it to inquire into the reasonableness of the request.

As a guide, in a non-emergency situation, the plan should be supplied to the Director within 10 working days of the utility receiving a request. In an emergency situation, the plan should be supplied within four hours of the request – recognising that utilities have duty staff responding to the emergency.

Q: *Will the Director accept as compliant and sufficient, plans provided to other regulators, eg, through the Electricity (Information Disclosure) Regulations 1999 Schedule 2(f), thus reducing compliance costs?*

A: While the format of plans is up to each utility to decide, they are expected to address the expectations of capability such as consideration of external risk, forecast of external demand and provision of service to CDEM-critical activity. The Disclosure Regulations do not provide such information.

Q: *How does the requirement to provide information under sections 76 or 60 of the Act, and the protection mechanism of section 83, relate to the Official Information Act or the controls under the Commerce Act? What protection is offered from disclosure of commercially sensitive material?*

A: The Act does not limit, substitute or affect the functions of the Official Information Act. A lifeline utility may seek to withhold its plan for reasons such as protection of trade secrets or commercial position. The Official Information Act is, however, based on the principle that information shall be made available unless there is good reason for withholding it. Given that the plan is being sought for CDEM purposes, it may be deemed to be in the public interest to make that information available.

Protection from disclosure is provided by section 83, whereby such information (eg, aspect of a lifeline utility business continuity plan) must not be disclosed or used except for the purposes of the Act. Breach of this clause is an offence under section 97, punishable by up to three months imprisonment or a \$5,000 fine for an individual, or up to a \$50,000 fine for a body corporate.

Q: *What are the penalties for non-compliance?*

A: Section 60 itself does not carry any direct offences, penalties and proceedings under the Act – preparedness is viewed as the obligation. If a utility was making no preparations, the Director may obtain a ruling from the court that the utility was acting unlawfully and order that it make preparations. All utilities can be expected to have business continuity plans of some sort, however, and it would seem most unlikely that the Director would ever need to invoke such a cumbersome procedure. The following related offences are associated with how lifeline utilities interact with the CDEM sector in terms of participating in planning, and the provision of, and protection of information:

- Section 95 makes it an offence for a person or body corporate to intentionally fail to comply with a requirement in a CDEM Plan.
- Section 96 makes it an offence to withhold or supply false information if requested under section 76 (power to require information) for CDEM purposes. Penalties exist under section 104 with a fine not exceeding \$50,000 for a body corporate.
- Section 97 (together with section 83 – restriction on disclosure) makes it an offence to intentionally disclose or use information supplied other than for the purposes of the Act.

Q: *What will this CDEM planning activity involve?*

A: Within six months of commencement CDEM Groups will form based upon the 12 existing regional boundaries (Northland, Auckland, Waikato, Bay of Plenty, Taranaki, Hawkes Bay, Manawatu-Wanganui, Wellington, Canterbury, West Coast, Otago, Southland). The five unitary authorities (Gisborne, Nelson, Tasman, Marlborough, Chathams) may elect to either form a standalone CDEM Group, join an adjacent unitary authority/s or an adjacent regional CDEM Group. In addition the Minister of Civil Defence may approve the merger of two or more CDEM Groups.

A map showing **regional boundaries** can be found at: www.ollivier.co.nz/atlas/adminbdy/index.html
Each CDEM Group is to be administered by its respective regional council. Descriptions of local authority activity and links to council websites can be accessed through: www.localgovt.co.nz

Both CDEM Group and national CDEM planning processes are likely to take the following approach:

- 1 Consultative Letters:** Utilities receive a consultative letter from the CDEM Group/Ministry, introducing the planning process and the information sought from the utility.
- 2 Individual Meetings:** CDEM Group/Ministry representative/s follow-up the initial letter and arrange a meeting to gain understanding through discussion of existing arrangements. Provision of actual hard copy plans is not required per se. The process is not an audit; its aim is to validate initial hazard analysis and begin moving it to the next iteration by gaining more specific information. More importantly this knowledge helps identify the cross-agency and cross-sector gaps that need attention to benefit all parties. Likely questions for discussion at individual meetings include:
 - What plans (written plans, guidelines, manuals, standard operating procedures, priority lists, business continuity plans, or other related documents) are currently in place across the 4R's?
 - What are their purpose, currency and revision cycles and what plans are proposed?

- What views/comments does their utility have on issues and gaps in planning?
- What do they see their contribution to a regional scale disaster as being (prompt provision of facilities, expertise etc especially for community organisations)?
- Have they been involved in any other organisation's planning (eg, amateur radio network)?
- What would they like their involvement in the CDEM Plan process to be?

Possible planning to discuss includes: corporate risk management framework, business continuity plan, emergency response plan, duplicate management centre plan, key supplier support arrangements, restoration priority lists, etc.

3 Focused Workshops: A small number of workshops will subsequently:

- obtain consensus on plan risk assessment criteria, prioritisation, and gap analysis
- gain agreement on risk (gap) treatment targets, actions and priorities
- document agreed planning including follow-up (monitoring and evaluation) process.

Attendance requirements will be tightly controlled to minimise the impacts upon utilities.

It may be that a single utility or body can represent sector interests, or that consensus on specific issues such as assessment criteria can be reached via correspondence as opposed to the need for physical meetings.

The Ministry has issued CDEM Groups with planning guidance to standardise regional and national approaches to CDEM planning. However, each CDEM Group will adapt the process to meet its own unique community needs. Therefore individual expectations as to lifeline utility involvement as well as the efficiency of the planning process may vary.

Annex B – Extracts from the CDEM Act 2002

Extract: Schedule 1 of the CDEM Act 2002

Schedule 1

Lifeline Utilities

Part A

Specific Entities

- 1 Radio New Zealand Limited and Television New Zealand Limited.
- 2 The company (as defined in section 2 of the Auckland Airport Act 1987) that operates Auckland international airport.
- 3 The company (as defined in section 2 of the Wellington Airport Act 1990) that operates Wellington international airport.
- 4 The airport company (as defined in section 2 of the Airport Authorities Act 1966) that operates Christchurch international airport.
- 5 The entity (being an airport authority as defined in section 2 of the Airport Authorities Act 1966, whether or not it is also an airport company as defined in that section) that operates the primary airport at Bay of Islands, Blenheim, Dunedin, Gisborne, Hamilton, Hokitika, Invercargill, Napier, Nelson, New Plymouth, Palmerston North, Queenstown, Rotorua, Tauranga, Wanganui, Westport, Whakatane, or Whangarei.
- 6 The port company (as defined in section 2(1) of the Port Companies Act 1988) that carries out port related commercial activities at Auckland, Bluff, Port Chalmers, Gisborne, Greymouth, Lyttleton, Napier, Nelson, Picton, Port Taranaki, Tauranga, Timaru, Wellington, Westport or Whangarei.

Part B

Entities carrying on certain businesses

- 1 An entity that produces, supplies, or distributes manufactured gas or natural gas (whether it is supplied or distributed through a network or in bottles of more than 20kg of gas).
- 2 An entity that generates electricity for distribution through a network or distributes electricity through a network.
- 3 An entity that supplies or distributes water to the inhabitants of a city, district, or other place.
- 4 An entity that provides a waste water or sewerage network or that disposes of sewage or storm water.
- 5 An entity that provides a telecommunications network (within the meaning of the Telecommunications Act 1987).
- 6 An entity that provides a road network (including state highways).
- 7 An entity that produces, processes, or distributes to retail outlets and bulk customers petroleum products used as an energy source or an essential lubricant or additive for motors for machinery.
- 8 An entity that provides a rail network or service.

Extract: Sections Relating to Lifeline Utilities

Duties of lifeline utilities

60 Duties of lifeline utilities

Every lifeline utility must-

- (a) ensure that it is able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency.
- (b) make available to the Director in writing, on request, its plan for functioning during and after an emergency.
- (c) participate in the development of the national civil defence emergency management strategy and civil defence emergency management plans.
- (d) provide, free of charge, any technical advice to any Civil Defence Emergency Management Group or the Director that may be reasonably required by that Group or the Director.
- (e) ensure that any information that is disclosed to the lifeline utility is used by the lifeline utility, or disclosed to another person, only for the purposes of this Act.

61 Schedule 1 may be amended by Order in Council

- (1) The Governor-General may, by Order in Council made on the recommendation of the Minister,-
 - (a) add the name of any entity or description of an entity to **Part A of Schedule 1**; or
 - (b) omit the name of any entity or description of an entity from **Part A of Schedule 1**; or
 - (c) amend the name of an entity or the description of an entity in **Part A of Schedule 1**; or
 - (d) add a description of a class of business to **Part B of Schedule 1**; or
 - (e) omit a description of a class of business in **Part B of Schedule 1**; or
 - (f) amend the description of a class of business in **Part B of Schedule 1**; or
 - (g) otherwise amend **Schedule 1** or revoke **Schedule 1** or a part of the schedule, and substitute a new schedule or a new part, as the case may require.
- (2) The Minister must not recommend the addition of the name of an entity or description of an entity to **Part A of Schedule 1** unless the Minister is satisfied that the entity operates a service or system the reduced availability, or non-availability, of which would constitute a hazard.
- (3) The Minister must not recommend the addition of a description of a class of business to **Part A of Schedule 1** unless the Minister is satisfied that the business provides a service or system the reduced availability, or non-availability, of which would constitute a hazard.

62 Minister may exempt lifeline utility

The Minister may, by notice in the *Gazette*, on any conditions that the Minister thinks fit, exempt a particular entity described in, or carrying on a business described in, **Schedule 1** in whole or in part from the provisions of this Act relating to lifeline utilities if the Minister is satisfied that the application of the provisions is not appropriate in the case of that entity.

Annex C – CDEM Group Activity

CDEM Group – Elected Members

In broad terms, CDEM Groups may be viewed as consortia of local authorities and emergency services (Police, Fire, Health) within a regional council boundary working together to deliver CDEM.

Technically, the Group is the joint standing committee of local authority mayors/chairs/councillors, which forms a decision-making body providing governance and clear political accountability.

Coordinating Executive Group (CEG)

The CEG provides advice to the CDEM Group (elected members), implements their decisions and oversees the implementation, development and maintenance of the CDEM Group Plan. CEG members are senior representatives with authority to act (commit resources and funding) and comprise:

- the chief executive officer of each local authority or a person acting on their behalf
- a senior member of each of the New Zealand Police and the New Zealand Fire Service and Rural Fire Authority
- the chief executive officer of the hospital and health services operating in the area or a person acting on their behalf
- any other person that may be coopted by the Group (eg, lifelines representative/s).

While the Act does not require lifeline utilities to have formal representation on the CEG, CDEM Groups are likely to seek targeted representation. Irrespective, those CDEM staff developing the Group Plan will be closely liaising with lifeline utilities. Lifeline utilities may also make submissions on proposed plans.

Lifeline utilities are therefore essential non-mandated members of CDEM Groups and are likely to interact at several levels:

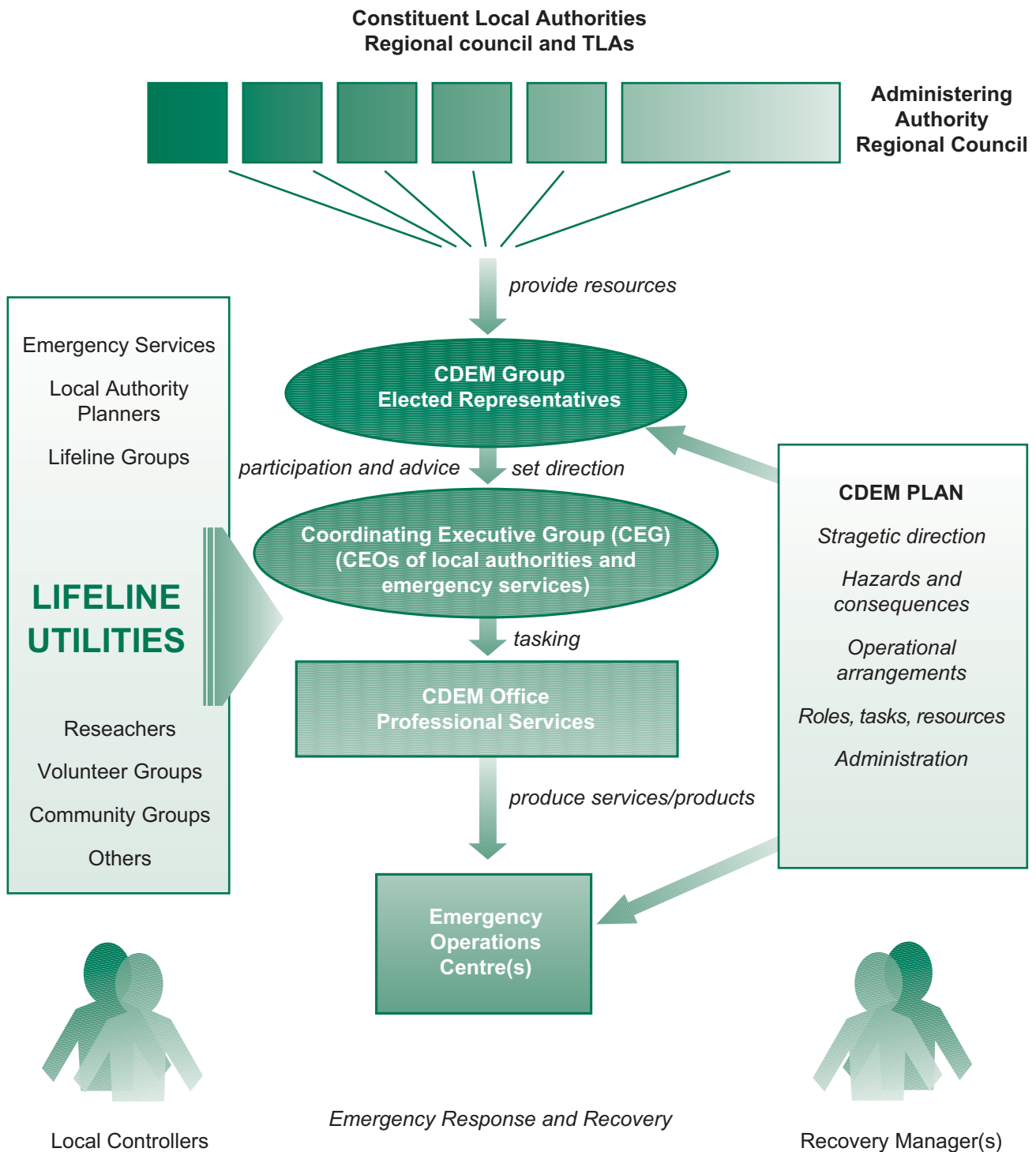
- Coopted representation on the CEG, or input at CEG sub-committee level.
- Direct input to the CDEM office (technical expertise cell) for CDEM Group Plan development.
- Submission to the Group regarding the plan.
- Establishing operational linkages with the Emergency Operations Centre/s.

Some of this activity may be assisted by regional Lifelines Groups coordination. The onus for risk reduction remains with utility owners, as reduction is as much an asset management activity as a community imperative/benefit. The coordination of response and recovery arrangements, however, will benefit from a structured approach led by CDEM Groups.

CDEM Groups will be seeking cooperation and coordination (not control) through the planning process. Lifeline utilities and CDEM Groups can capitalise on the ability to gather and share expertise, minimise costs, and avoid duplication and wastage of effort. Local authorities and emergency services recognise commercial imperatives, downsizing and outsourcing constraints and are unlikely to have unrealistic expectations of lifeline utility input to the CDEM Group Plan development.

Regional councils will be appointed as administering authorities for CDEM Groups. Utilities should contact their regional council CDEM officer to find out the status of the CDEM Group and how they can benefit from its activity. Alternatively, contact can be made through regional Lifelines Groups (**see Annex D**).

The figure below outlines the likely structure of CDEM Groups under the CDEM Act 2002*.



* For further information see the Director's Guidelines documents DGL 1/02 & 2/02 on the formation of CDEM Groups and CDEM Planning, available from the Ministry of Civil Defence & Emergency Management and on its website www.civildefence.govt.nz

Annex D – Lifelines Groups

The Lifelines Approach

Lifelines Groups act as facilitators to promote reduction (mitigation) and readiness work to be carried out by members. The emphasis is on educating and motivating by developing and providing best practice information. The New Zealand Lifelines process is typically regionally based (not organisationally) so will often align with CDEM Groups. There are Lifelines Groups either underway or planned in virtually all regions.

The voluntary nature of Lifelines Groups means levels of involvement are discretionary, as is funding, typically via grants from each organisation in recognition of the level of individual benefit. Lifelines Groups recognise, respect and work within the bounds of commercial confidentiality.

The focus of Lifelines Groups in New Zealand is on regional scale events that are beyond the ability of individual organisations to respond to and control. Nevertheless, the responsibility for taking appropriate mitigation and preparedness steps remains with these individual organisations.

Goals and Objectives

Lifelines Groups are informal, voluntary groupings of lifeline organisations with shared common goals such as:

- reducing damage levels following a major disaster event
- reducing the time taken by lifelines to restore their usual level of service and commercial recovery.

Objectives typically include:

- encouraging and supporting local authorities and network operators in identifying hazards and mitigating the effects of hazards on lifelines
- facilitating communication between local authorities and network operators in order to increase awareness and understanding of interdependencies
- creating and maintaining community awareness of the importance of lifelines and of reducing the vulnerability of lifelines
- promoting ongoing research and technology transfer aimed at protecting and preserving lifelines
- developing best practice approaches to mitigation and preparedness measures for lifelines.

The Lifelines Project Process

Utility and transportation network operators are brought together within a region, with input also provided by scientists and engineers, emergency managers, and planners. In this way, lifelines groups facilitate and motivate a collective physical risk management process for regional scale events and impacts. The actual process (carrying out a Lifelines Project) involves the following key steps:

- **Identify** the hazards which could affect each lifelines network
- **Compile** common inventories of the various networks eg, via GIS
- **Assess** the vulnerability of the lifeline network to those hazards
- **Assess** the potential damage to and consequences for each network
- **Identify** and implement practical mitigation measures
- **Facilitate** the preparation of comprehensive emergency response plans

The principal output from such a lifelines project is the identification of possible physical mitigation measures that operators of utility and transportation systems can undertake to reduce the risk from the major identified hazards.

Another key area of emphasis is to create and maintain awareness of the importance of lifelines to the community at large. Lifelines work helps to portray a wider perspective of what major hazard events will mean for the community. For example, people react to the thought of being without water or sewage facilities for a week far more consciously than the threat of being injured by a damaged building in an earthquake.

The benefits associated with being a member of a Lifelines Group are numerous, reflecting the concept of cooperative CDEM planning and may include:

- access to best practice risk and asset management concepts and procedures for utility and transportation sector lifelines
- free CDEM identification and analysis of hazards in each region to assist in utility continuity planning
- access to workshops, exercises and other activities organised by the Lifelines Group. Many Groups carry out an extremely beneficial annual review of lifeline reduction activity
- links to community leaders in a crisis to assist in lifeline restoration and return to business
- enhanced community understanding and appreciation for utility business
- the coordinated development of information, concepts and procedures, which would be expensive and less effective for utility organisations to develop individually
- ease of exchange of information and views, leading to familiarity with regional mitigation and preparedness programmes and issues of common interest.

The CDEM Act 2002 places emphasis on integrated 4R planning across and between sectors, and therefore increases the importance of lifelines projects.

For the latest Lifelines Groups status and contacts across New Zealand see www.civildefence.govt.nz

Annex E – Continuity Planning

Definitions

For the purposes of this document:

Business Continuity Management (BCM) is the act of anticipating incidents that will affect critical functions and processes for the organisation and ensuring that it responds to any incident in a planned and rehearsed manner.

Continuity Planning is planning that contributes to the protection of cash flow, assets, market share and service levels.

Business Continuity Planning (BCP) is the part of risk or business continuity management that establishes cost-effective treatments in an outage, seeking to maintain the uninterrupted availability of key resources required to support essential business activities.

BCP is one element (arguably the most important) within the framework of BCM which itself resides within the sphere of activities known as risk management. BCM is an organisation-wide ongoing process, not a one-off planning activity.

Ownership

We are fortunate in New Zealand that privately owned utilities realise that ensuring continuity of service enhances shareholder value. Protecting services essential to the community helps retain market share and recognises that communities and utilities rely on each other for survival.

Risk, asset and emergency management processes work best when owned and understood by utility employees. While consultants may be useful in assisting the planning process, it is preferable for utilities to take the time to develop and own the continuity planning process, getting it right and building sound relationships, as opposed to adopting an expedient external solution.

Focus

Irrespective of a utility's definition of BCM, BCP or other risk management processes, the focus of continuity planning under the CDEM Bill is upon ensuring continuity of operation or supply of service to CDEM-critical activity such as hospitals, emergency services headquarters and welfare facilities. Critical activities and services are defined through regional CDEM Groups and National CDEM Plans and align with priorities set by Government for allocation of resources during emergency response (*National Civil Defence Plan – Part 1*). These priorities include:

- preservation of life – rescue and triage (prioritization of injured)
- maintenance of law and order – supporting police operations
- care of sick, injured and welfare provision – first aid, medical and evacuation facilities
- property protection – supporting fire services
- maintenance and restoration of essential services – water, sewerage, telecommunications, electrical power and gas, food, essential items, transport services, public information and media.

Example: Restoration Priorities

During the Auckland power crisis of 1998, the Auckland Engineering Lifelines Group provided a critical facilities list – with public health and food safety given top priority – to prioritise restoration of power to the city.

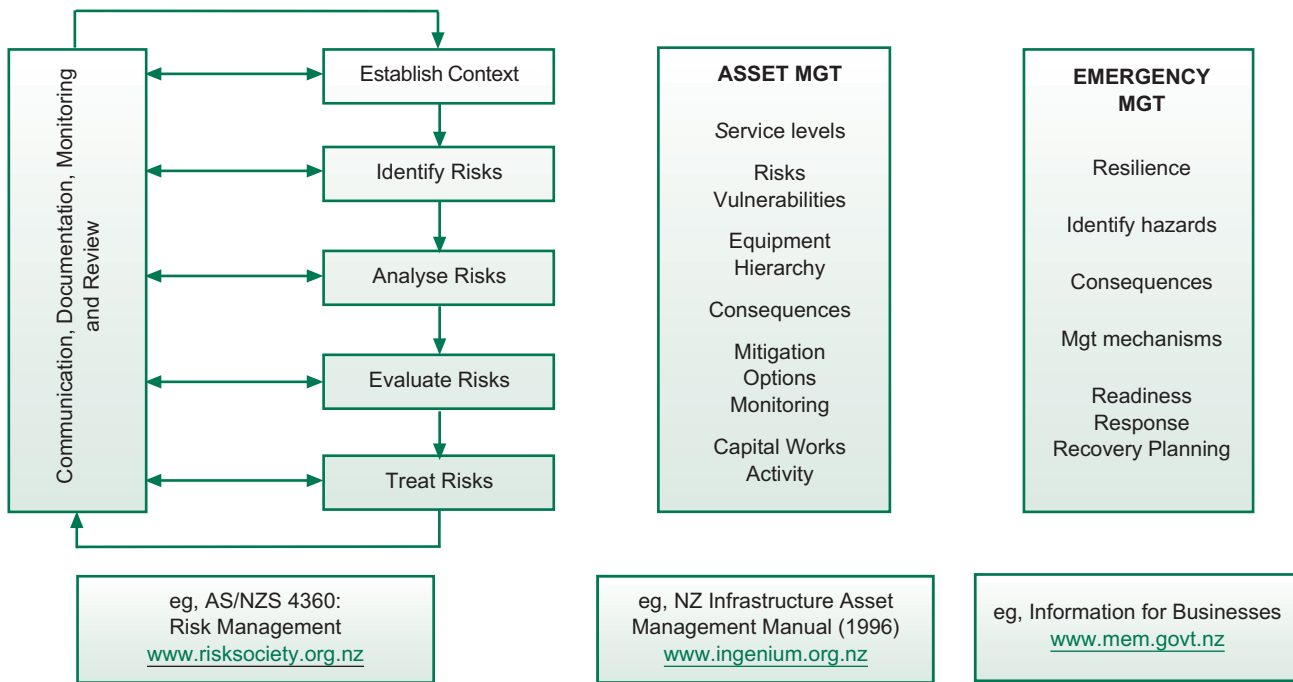
The event highlighted the need to have established relationships between utilities, local government and the emergency services.

Whilst the distributor was competent with a network planned to best practice at the time, it did not have a sound asset management programme, the required asset expertise, adequate spares pooling or mutual aid arrangements.

The event reaffirmed the community's heavy dependence upon reticulated electricity. Auckland suffered a water crisis in the early nineties, a power crisis in 1998, an algal problem in 2000 – lifeline utility emergencies do occur. Is your lifeline capable?



Asset and emergency management practices reflect risk management principles (refer AS/NZS 4360) and all three should be considered as paralleling each other:



Further Information

Lifeline utilities are required to have plans in place for continuity of operation. The Ministry does not provide risk or continuity planning consultancy and recognises that there are many valid and different approaches to ensuring business robustness through continuity planning. The following websites are good reference points for assisting with the development of such planning. These websites represent just some of the many sources/firms engaged in continuity management activity and their inclusion does not necessarily imply endorsement by the Ministry:

NZ Society for Risk Management	www.risksociety.org.nz
Business Continuance Planning Ltd	www.bcp.co.nz
Standby Computing Services	www.standby.co.nz
AON New Zealand	www.aon.co.nz
Compaq NZ	www.compaq.co.nz
DRI International	www.dr.org
Contingency Planning & Management	www.contingencyplanning.com
Contingency Management	www.cm.com.au
Disaster Recovery Journal	www.drj.com
Asset Management	www.ingenium.org.nz
The Business Continuity Institute	www.thebci.org
DRI International	www.drii.org
Survive – The Business Continuity Group	www.survive.com

Other resources, including documents on CDEM Group Planning can be found on the Ministry's website at

www.civildefence.govt.nz

Ministry staff may be contacted at:

Wellington

PO Box 5010
WELLINGTON

Ph (04) 473 7363
Fax (04) 473 7369

Auckland

PO Box 76-247
MANUKAU CITY

Ph (09) 262 7830
Fax (09) 262 7831

Christchurch

PO Box 13-766
CHRISTCHURCH

Ph (03) 379 5224 / 0294
Fax (03) 379 5223

Checklist

To gauge where your utility is positioned in relation to the Act's expectations, use the checklist below.

Question: *Has your utility.....?*

Score: *Yes = 2, Partially = 1, No = 0*

Developed procedures to ensure continuity of business?	
Considered external risks (eg, dependence upon other utilities or contractors)?	
Assessed risks by testing with external agencies, not via assumption?	
Forecast a restoration priority in consideration of critical CDEM activity?	
Established planning and operational relationships with CDEM Groups/local authorities and emergency services?	
Planned in a cross-sector manner to optimise service during emergencies?	
Protected continuity of supply (eg, via purchasing options to protect hedge contracts, developing sector based mutual-aid agreements, providing access to alternate supply)?	
Developed an ability to reconfigure networks?	
Established cooperative/mutual aid mechanisms for emergency resources or personnel?	
Developed load shedding mechanisms that enable continuance of supply to CDEM critical facilities?	
Ensured that conditional supply arrangements with retailers take account of the necessity of CDEM prioritisation during emergencies?	
Reached sector accord over common approaches to reduction, readiness and response activities thus protecting your marketplace?	
Shared and applied examples of best practice emergency management across the sector?	
Determined how the sector communicates during an event?	
Sought sector accord or consensus on sustainable development of market resources?	

0-10	Your utility's risk management tends to be too internally focused. You may be vulnerable to failure due to external risks and will have difficulty responding to and recovering from emergencies due to weak relationships with CDEM agencies and the communities upon which your business relies for survival.
11-19	Consideration of external risk, interdependencies and outsourcing is strengthening your business survival prospects. Continue to improve business resilience by strengthening external relationships and cooperative planning.
20-30	Sound consideration of external as well as internal risk has probably led to development of organisation-wide risk, asset and emergency management planning. Planning has been developed cooperatively with CDEM agencies and community/customer relationships strengthened. Continue to protect market share and add shareholder value by improving relationships and testing and reiterating plans. Publicise and capitalise on your success and relationships.

Note: The above checklist and rating criteria is a subjective example only, and is not based on any objective standard.

