TRANSPOWER

QUALITY ALERT!

23 December 2025

Code Obligations and Operating Sequences

ISSUE IDENTIFIED:

A breach of the Electricity Industry Participation Code (Code) can happen even without interruption to supply, exposing Transpower to penalties of up to $2m. The Code requires asset owners protection systems to:

- be robust, selective, and fast-acting to isolate faults,
- maintain grid stability,
- minimize impact on other assets,
- be designed, commissioned and maintained and settings applied that are selective when operating.

Poor discipline during compiling and actioning of an Operating Sequence (OS) can lead to a breach. (e.g., leaving incorrect settings in place or failing to verify equipment status).

Strict adherence to TP.SS 07.12 Operating Sequences is essential when planning, compiling, reviewing, and actioning OS, which can affect compliance with the Code.

CONTRIBUTING FACTORS:

- **Lack of Segregation of Duties:** where the same person compiled, reviewed, and actioned OS.
- **Insufficient Preparation:** actioner starting tasks started without sufficient time for reviewing OS or verifying equipment status.
- **Distractions:** actioners engaging in unrelated activities (e.g., answering phone calls, retrieving keys) while performing any steps during OS actioning.
- **Site Coordination Gaps:** Actions completed at separate sites without appropriate co-ordination for sequencing of interdependent items
- **Premature Sign-Off:** actions marked as completed on OS without actual execution or proper confirmation.
- **Planning/Workload:** actioners high workload can increase likelihood of procedural breaches.
- **Incorrect asset status:** i.e., relevant protection systems left configured incorrectly, or switches (i.e., disconnectors or VT isolation etc) left in incorrect state.

ACTIONS TO PREVENT REOCCURENCE:

- Service Providers are to ensure Lessons from incidents shared at Permitting & Operating Sequence Practices (POSP) Group have been shared widely with their relevant teams to embed learnings and improvement.
- Compilers and Actioners are to ensure they strictly follow TP.SS 07.12 OS protocols.
- Actioners must ensure proper OS sign-off and confirm task completion and accountability for asset status.
- Service Provider must ensure appropriate planning / resource management to manage actioner workloads.

LEARNINGS FROM THIS:

- Ensure compliance with TP.SS 07.12 Sections 1.7–1.9: plan, check, approve, and confirm accurate marking of each completed step.
- Allowing time for Operating Sequences to be reviewed before execution.
- The roles of the compiler and checker of an OS must be given to separate people.
- Ensure focus is maintained during all steps of actioning the Operating Sequence items.
- Coordinate across sites and confirm interdependent tasks.

For more information, please contact:

Quality Alert ref. 2025-018

Name: Emma Ross
Designation: Quality Specialist
Phone: 04 590 6387
Mobile: 022 584 7913
Email: emma.ross@transpower.co.nz