



Mr Jarrad Pilkington
Manager Energy Policy
Australian Energy Market Operator

By email: [REDACTED]

Dear Mr Pilkington

The COVID-19 pandemic has and continues to challenge the energy industry, especially with regards to planned maintenance outages and operations. Access to specialised resources including parts, consumables and specialist workers, both domestically and internationally, was severely limited during lockdowns, and continues to be a challenge.

In NSW, large scale generator outages and site construction works had to be delayed or scaled back due to Public Health Order constraints. As a result, particular critical generator maintenance outages were postponed such as the EnergyAustralia Mount Piper Power Station outage that was initially scheduled between September to November 2021.

Outages that proceeded were subjected to longer outage schedules or reduced scope of works due to COVID-19 Safety Plans, which required the segregation of workers, isolation of work areas and staggering of work shifts resulting in lower productivity. These factors required outage scheduling and prioritisation to be more collaborative, given generators are now having to schedule outages across the financial year rather than the traditional “shoulder” periods.

Generators typically rely on a common pool of specialist workers that support critical maintenance works across jurisdictions. Public Health Order constraints and jurisdictional border restrictions have further limited the available pool of workers across the National Electricity Market. The scheduling and planning of outages require closer coordination to ensure that reliance of staff that are subjected to Public Health Orders across jurisdictions and its impacts are understood. The NSW jurisdiction experienced this firsthand in facilitating specialist workers from other jurisdictions and also facilitating international travel exemptions with the Australian Government.

Generators have also required operations and control room staff to work in separate teams in isolation to manage COVID-19 risks. This approach has resulted in lesser availability of deputy and back-up staffing options and also constraints with roster management due to fatigue management policies. Infrastructure owners will benefit by being able to share critical operational staff under constraints to ensure continuity of supply.

The Australian Energy Market Operator (AEMO) has acknowledged the constraints above as part of its assessment of the electricity market in terms of reliability and continuity of supply especially during the peak summer season. The NSW jurisdiction has observed such constraints in the energy sector and can confirm that the constraints being highlighted by AEMO are consistent with feedback from NSW energy stakeholders.

The NSW jurisdiction supports AEMO's request to consider the proposed interim authorisation to enable coordination of repairs and maintenance, sharing of essential personnel, production and ongoing operational information. This is an important aspect to ensure continuity of energy supply especially during the peak summer period given generator reliability has been conveyed as a key concern as outlined in the 2021 AEMO Electricity Statement of Opportunities.

The authorisation will enable swift response to generator unplanned outages and critical worker resource constraints that might otherwise lead to energy supply scarcity. From the NSW perspective, the authorisation may need to be in effect until at least 30 June 2023 due to the legacy impacts of COVID-19 on the required maintenance for major generation assets in the National Electricity Market.

Should you have any further questions in relation to this matter, please contact me at

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Yours sincerely

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Andrew Lewis
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Jurisdictional System Security Coordinator
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29 October 2021