Brussels, 30 March 2020

Subject: Essential services and infrastructures – as well as related workers – during the coronavirus crisis: importance to include the energy sector

Dear Commissioner Johansson,
Dear Commissioner Schmit,
Dear Commissioner Simson,

I am contacting you on behalf of **Cogen Europe, EBA, ETE, ETN, EUGINE, EUTurbines, SolarPower Europe and WindEurope,** associations representing the providers of power generation technologies and services.

The coronavirus (COVID-19) crisis presents a great challenge to the European economy and society, whose impact and extent remain difficult to assess. Drastic measures are needed to limit the virus propagation, yet essential services need to be guaranteed.

Following the publication of the European Commission's "*Guidelines for border management measures to protect health and ensure the availability of goods and essential services"* (C(2020) 1753 final) on March 16th, 2020, we would like to raise the European Commission's attention to an additional area not covered yet: the energy sector and related services and infrastructure as key contributors in ensuring the well-functioning of Europe's economy and society.

Ensuring a reliable energy supply to all Europeans is a main concern in the energy sector. Our members, providers of equipment, parts & services and their key suppliers must be able to guarantee support to plant operators in case of an outage or maintenance performance (e.g.: in hospitals, emergency power plants, etc.). This means that available staff should be able to travel at all times – even when restrictions are in place – without delay.

We therefore call on the European Commission to supplement the guidelines and include the energy sector as an "essential service and infrastructure". In the same way, exceptions for the sector's workers as well as ensuring continued supply of components and spare parts should be foreseen, so that they can continue working during these restrictions – always limiting their exposure and ensuring their well-being by focusing their involvement to core business activities only. Personnel should be allowed to carry out activities to support operations and maintenance to "essential infrastructures" – which may also include cross-border activities.

A document from the US Cybersecurity and Infrastructure Security Agency (CISA), identifying essential critical infrastructure workers in this crisis, could provide a helpful description to define the workers concerned. The relevant parts regarding the electricity and gas sector are copied into the annex of this letter.

While different measures are being adopted in different Member States – as the national situations also differ –, we believe that it would be helpful that the European Commission also addresses and gives general guidance on the above mentioned area.

We remain available to provide further details to define “essential service and infrastructures” and outline where the involvement of workers may be deemed necessary and critical during the coronavirus crisis.

On behalf of Cogen Europe, EBA, ETE, ETN, EUGINE, EUTurbines, SolarPower Europe and WindEurope

Ralf Wezel
Secretary General EUGINE & EUTurbines

COGEN Europe, the European Association for the Promotion of Cogeneration, is the cross-sectoral voice of the cogeneration industry. Its mission is to work with EU institutions and stakeholders to shape better policies and eliminate administrative, regulatory and market barriers to the wider use of cogeneration in Europe.

EBA is the voice of renewable gas in Europe. Founded in February 2009, the association is committed to the active promotion of the deployment of renewable gas production and use throughout the continent. EBA counts today on a well established network of over 100 national organisations, scientific institutes and companies from Europe and beyond.

Energy Technologies Europe is the European association representing technology providers of state-of-the-art solutions for energy conversion technologies. Energy Technologies Europe is a committed actor of the energy transition promoting awareness on solutions to achieve a decarbonised economy.

European Turbine Network (ETN) is an association bringing together the entire value chain of the turbomachinery community and addresses operational and research challenges of utilities, industrial users and oil & gas sector. Through cooperative efforts and by initiating common activities and projects, ETN encourages and facilitates information exchange and cooperation to accelerate research, development, demonstration, and deployment of safe, secure and affordable carbon-neutral turbomachinery-based energy solutions by 2030, implemented widely and globally by 2050.

EUGINE is the voice of the European engine power plants industry, representing the leading European manufacturers of this flexible, efficient, reliable and environmentally sound technology. Engine power plants are an optimal solution for both backing-up and generating renewable energy (e.g. with biogas). Cogeneration, the combined generation of power and heat/cold, is a typical engine power plant application providing highest efficiency.

EUTurbines is the only association of European gas and steam turbine manufacturers. Its members are Ansaldo Energia, Baker Hughes, Doosan Skoda Power, GE Power, MAN Energy Solutions, Mitsubishi Hitachi Power Systems, Siemens Gas and Power and Solar Turbines. EUTurbines advocates an economic and legislative environment for European turbine manufacturers to develop and grow R&I and manufacturing in Europe and promotes the role of turbine-based power generation in a sustainable, decarbonised European and global energy mix.

SolarPower Europe is a member-led association that represents organisations active along the entire solar value chain. SolarPower Europe‘s aim is to ensure that more energy is generated by solar than any other energy source by 2030 and lead its 200+ members to make solar the core of a smart, sustainable, secure and inclusive energy system in order to reach EU climate neutrality before 2050.

WindEurope is the voice of the wind industry, actively promoting wind power in Europe and worldwide. It has over 400 members with headquarters in more than 35 countries, including the leading wind turbine manufacturers, component suppliers, research institutes, developers, contractors, electricity providers, financial institutions, insurance companies and national wind energy associations.

Annex

"Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response"
Version 1.1 (March 23, 2020), Cybersecurity and Infrastructure Security Agency. Available at: https://www.cisa.gov/sites/default/files/publications/CISA_Guidance_on_the_Essential_Critical_Infrastructure_Workforce_508C_0.pdf

ENERGY (p. 7-8)
Electricity industry:

- Workers who maintain, ensure, or restore, or are involved in the development, transportation, fuel procurement, expansion, or operation of the generation, transmission, and distribution of electric power, including call centers, utility workers, reliability engineers and fleet maintenance technicians
- Workers needed for safe and secure operations at nuclear generation
- Workers at generation, transmission, and electric blackstart facilities
- Workers at Reliability Coordinator (RC), Balancing Authorities (BA), and primary and backup Control Centers(CC), including but not limited to independent system operators, regional transmission organizations, and balancing authorities
- Mutual assistance personnel
- IT and OT technology staff – for EMS (Energy Management Systems) and Supervisory Control and Data Acquisition (SCADA) systems, and utility data centers; Cybersecurity engineers; cybersecurity risk management
- Vegetation management crews and traffic workers who support
- Environmental remediation/monitoring technicians
- Instrumentation, protection, and control technicians

Natural and propane gas workers:

- Natural gas transmission and distribution pipelines, including compressor stations
- Underground storage of natural gas
- Natural gas processing plants, and those that deal with natural gas liquids
- Liquefied Natural Gas (LNG) facilities
- Natural gas security operations center, natural gas operations dispatch and control rooms/centers natural gas emergency response and customer emergencies, including natural gas leak calls
- Drilling, production, processing, refining, and transporting natural gas for use as end-use fuels, feedstocks for chemical manufacturing, or use in electricity generation
- Propane gas dispatch and control rooms and emergency response and customer emergencies, including propane leak calls
- Propane gas service maintenance and restoration, including call centers
- Processing, refining, and transporting natural liquids, including propane gas, for use as end-use fuels or feedstocks for chemical manufacturing
- Propane gas storage, transmission, and distribution centers

We suggest to add for Europe biogas to the listing above:

- Biogas plants, storage, transmission, and distribution