



18 July 2024

Anna Collyer  
Chair  
Australian Energy Market Commission

Lodged online: [www.aemc.gov.au](http://www.aemc.gov.au)

Dear Ms Collyer,

### **Cyber security roles and responsibilities**

Origin Energy Limited (Origin) welcomes the opportunity to comment on the AEMC's Consultation Paper on Cyber security roles and responsibilities. Origin broadly supports the proposal to formalise cyber security as concept in the rules and to establish four new cyber security functions for AEMO. These changes would provide confidence that AEMO can continue to plan for and manage cyber security events. It would ensure that the power system remains resilient to potential cybersecurity threats.

We consider the benefits of both proposals outweigh the costs:

- Many of the proposed functions are already carried out by AEMO, either in meeting existing Federal cyber security legislation (the Security of Critical Infrastructure Act), or as part of its stewardship of the Australian Energy Sector Cyber Security Framework (AESCSF), which is used by market participants in implementing cyber security processes.
- The new proposed functions, such as providing advice on the risks of cyber events to the electricity industry, would be valuable to market participants for incident planning purposes. Additional information can help with benchmarking of cyber security processes and lead to improvements in how incidents are planned for and managed.

The Consultation Paper seeks feedback on whether we consider cyber security to be a power system security or a network planning and expansion issue. We consider that regardless of the option chosen, the functions should be broad enough to allow AEMO to plan appropriately for all types of cyber security events that could affect the electricity industry, including those that could occur as the grid and technologies evolve (e.g., through higher consumer energy resources participation).

If you wish to discuss any aspect of this submission further, please contact me at [Sarah-Jane.Derby@originenergy.com.au](mailto:Sarah-Jane.Derby@originenergy.com.au) or by phone, on (02) 8345 5101.

Yours sincerely,

A handwritten signature in black ink, appearing to read "S. Derby".

Sarah-Jane Derby  
Senior Manager, Regulatory Policy