

12 July 2024

Nomiky Panayiotakis
Project Leader
Australian Energy Market Commission
Submitted online

Dear Nomiky,

Re: Cyber security roles and responsibilities Consultation Paper

TasNetworks appreciates the opportunity to provide feedback on the Cyber security roles and responsibilities rule change. Cyber security, particularly as it extends to power system security, is critical to TasNetworks as the transmission network service provider and distribution network service provider in Tasmania.

TasNetworks supports the Australian Energy Market Operator (**AEMO**) having a role in coordinating and supporting cyber security in the electricity system. AEMO already provides critical support through work such as the development of the Australian Energy Sector Cyber Security Framework (**AESCSF**) and by conducting cyber-attack preparedness exercises. AEMO's understanding of the energy market and power system security positions them well to undertake these functions.

In considering the rule change proposal, the AEMC should ensure incorporating cyber security functions in the NER maximises net benefits to customers. Customers will benefit the most if:

- the roles and functions between market participants, AEMO and other cyber security agencies are clear and well understood; and
- arrangements align with existing practices and obligations on market participants.

AEMO's role should not duplicate cyber security roles being performed by other agencies. TasNetworks suggests the AEMC consult with existing cyber security agencies during consideration of the rule change to understand if and how the functions proposed for AEMO are currently delivered. TasNetworks also considers that AEMO would be well placed to align overlapping requirements. For example, it would be beneficial to align the AESCSF's required timing for self-assessments with the timing in the Critical Infrastructure Risk Management Program (**CIRMP**) annual report requirements from Section 30AG of the Security of Critical Infrastructure Act (2018).

In consideration of the statement in Function 2, 'could also include administering AESCSF self-assessments for industry', it is requested that consultation with industry on assessment criteria, process and costs be undertaken as part of any decision. TasNetworks suggests that if cyber security functions are included in the NER, AEMO should be required to comply with the Rules Consultation Procedures in rule 8.9 of the NER prior to making or changing any cyber security guideline or procedure.

It is important that the cyber security role of AEMO is clear. AEMO's role should focus on cyber security threats to the energy system, and it must be clear to participants whom they are required to engage if a cyber threat emerges on corporate systems or non-electricity related systems. TasNetworks recommends the AEMC consider AEMO's cyber security role in respect of the energy system as opposed to the broader scope of the energy sector.

If you have any questions in regard to this letter, please contact Sam Riewoldt, Regulatory Analyst at [REDACTED]

Yours sincerely

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Chantal Hopwood
Head of Regulation