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Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000
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Submitted electronically

Cyber security roles and responsibilities Consultation Paper

Snowy Hydro Limited welcomes the opportunity to comment on matters raised in the Cybersecurity roles and responsibilities Consultation Paper by the Australian Energy Market Commission (the Commission).

Cyber security is a critical concern within Australia and is even more important given energy security within the NEM which is increasing due to digitalisation and connectivity. Snowy Hydro agrees with the consultation paper which notes that a *“cyber incident is an unwanted or unexpected cyber security event”* that can *“have a significant probability of compromising business operations.”* Cyber security incidents in the electricity sector could have far-reaching implications, from widespread outages, to economic disruptions, breach of sensitive data and threats to national security.

It is for this reason Snowy Hydro supports specific cyber security roles and responsibilities that AEMO would perform to assist in enhancing cyber security across the energy system which are not specified in the rules. AEMO will play a key role in maintaining and improving cyber security preparedness within the power system, in addition to other power system security needs.

The functions for AEMO should be flexible but should not enable AEMO to impose any additional mandatory obligations on participants. Snowy Hydro would have significant concerns if there were any additional mandatory obligations without a proper consultation and relevant time to implement and discuss the changes. Without these, market participants would have to undertake costly upgrades of internal systems and processes while balancing the numerous changes being made currently in the market.

Critical to understanding the cyber security issues Snowy Hydro supports AEMO facilitating the distribution of critical cyber security information to market participants. In this function, we welcome AEMO facilitating the distribution of information including:

- warnings of cyber vulnerabilities or threats
- annual assessment conclusions
- post-cyber incident reports
- preventative patches in commonly used technologies.

It is critical that market participants fully understand the scope of the required system changes that would help to inform the implementation timetable. At the current time there is sufficient regulatory oversight for market participants across Australia, such as the Department of Home Affairs (DHA) Security of Critical Infrastructure Act 2018 (SOCl) requirements.

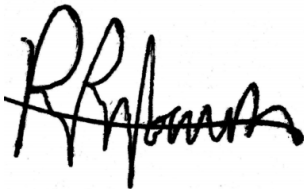
It is for this reason these reports or changes should not lead to an increased cyber compliance burden or AEMO increasing their regulation over the system and market cyber security uplift. Snowy Hydro however will continue to work closely with AEMO and assist with any learnings and improvements they can provide.

About Snowy Hydro

Snowy Hydro Limited is a producer, supplier, trader and retailer of energy in the National Electricity Market ('NEM') and a leading provider of risk management financial hedge contracts. We are an integrated energy company with more than 5,500 megawatts (MW) of generating capacity. We are one of Australia's largest renewable generators, the third largest generator by capacity and the fourth largest retailer in the NEM through our award-winning retail energy companies - Red Energy and Lumo Energy.

Snowy Hydro appreciates the opportunity to respond to the Commission on the Cybersecurity roles and responsibilities Consultation Paper. Any questions about this submission should be addressed to panos.priftakis@snowyhydro.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Panos Priftakis".

Panos Priftakis
Head of Wholesale Regulation
Snowy Hydro