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28 October 2024

Anna Collyer
Chair
Australian Energy Market Commission
Level 15, 60 Castlereagh St
Sydney 2000
E: aemc@aemc.gov.au

National Electricity Amendment (Cyber Security Roles and Responsibilities) Rule 2024

Dear Ms Collyer,

Thank you for the opportunity to provide feedback to the Australian Energy Market Commission (AEMC) Draft Determination on Cyber Security Roles and Responsibilities in the National Electricity Market (NEM).

SMA Australia strongly supports the proposed National Electricity Amendment (Cyber security roles and responsibilities) Rule 2024. In addition to the proposed rule, we note and welcome the recent developments in governance and regulation of cyber security, which include:

- The endorsement by the Energy and Climate Change Ministerial Council (ECMC) of a National Consumer Energy Resources (CER) Roadmap which includes implementation of the *Roadmap for CER Cyber Security*.
- Publication of the *Standards Australia Roadmap for CER Cyber Security* which was commissioned by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) and which recommends direct adoption or modification of IEC 62443 and IEC 62351 as Australian Standards.
- The introduction into Parliament of the *Cyber Security Bill 2024*, which establishes a power to make rules about cyber security standards for smart devices that are internet- or network-connectable.

I would like to take this opportunity to update you and your staff at the AEMC on recent progress made by SMA in cyber security.

SMA has worked with cyber security consultants CAPA Intelligence to develop guidelines for compliance with the Australian Energy Sector Cyber Security Framework (AESCSF) applicable to suppliers of inverters to utility-scale generators. The guidelines were completed in June 2024 and by August 2024 SMA had completed a self-assessment to demonstrate SP1 compliance with the AESCSF guidelines. We have subsequently used the guidelines and our assessment against them to satisfy electricity generators who have included cyber security compliance as a contractual requirement for inverter original equipment manufacturers (OEMs). We would be pleased to share the guidelines and our self-assessment against them with you or your staff.



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In September 2024 SMA successfully completed its assessment against the SA Power Networks' *Dynamic Exports Cyber Security Requirements* and a letter of confirmation was sent to SA Power Networks. We would be pleased to share our feedback to SA Power Networks with you or your staff.

On 9 October 2024 SMA announced that our customer data management portal, known as Sunny Portal Solution and its associated software, hardware and support processes, are certified under ISO/IEC 27001, which is the premier international standard for information security management systems. Compliance with ISO 27001 provides assurance of a high level of cyber security and protection of the privacy of customers' personal energy data.

As an inverter OEM, SMA also complies with IEC 62443-4-1 (requirements for the secure development processes of products), IEC 62443-4-2 (requirements for products) and parts of IEC 62443-3 (system security requirements).

SMA encourages the ECMC and the AEMC to consider the following reforms for cyber security uplift in the electricity sector:

- Move from encouraging self-assessment toward mandating independent third-party assessment,
- For CER systems under 200kW, mandate ISO 27001 (or its Australian equivalent AS ISO 27001) which is particularly important for customers whose data is stored and used offshore and whose privacy and data security might not be governed by Australian legislation,
- Encourage the application of the AESCSF for inverters and systems in the 200kW to 30MW size range, which are currently not the subject of cyber security regulations,
- Adopt IEC 62351 and IEC 62443 as Australian standards, and
- Assist customers, policy makers and industry to improve data security and safeguard customer privacy by publishing information on the laws and standards governing servers in overseas locations.

SMA plays an active role in development and implementation of cyber security policies, regulations, and standards. SMA-Australia's head of Energy Policy and Regulation, Darren Gladman, is the chair of the Smart Energy Council's Cyber Security Working Group. We would be pleased to meet with you to discuss these issues.

Best regards,

A handwritten signature in black ink, appearing to read 'Doris Spielthener', with a long, sweeping horizontal line extending to the right.

Doris Spielthener

SMA Australia

Regional Manager APAC & Managing Director Australia & NZ