

26 February 2026

Australian Energy Market Commission (AEMC)

Via AEMC website: www.aemc.gov.au

Gas cyber security roles and responsibilities for AEMO

Alinta Energy welcomes the opportunity to provide feedback to the 'Gas cyber security roles and responsibilities for AEMO' Consultation paper.

We make the following recommendations for the Commission's consideration.

- **We support the formalisation of AEMO's cyber security roles and responsibilities for the ECGS**, including ensuring that AEMO adheres to and implements AESCSF standards.
- **We encourage AEMO to leverage common resources and a harmonised approach across its gas and electricity cyber security functions**. A harmonised approach with the NEM is desirable to streamline processes, avoid duplication and reduce costs.
- **There should be no additional mandatory obligations on Market Participants**, and care should be taken to ensure responsibilities and actions do not expand beyond the proposed scope.
- **We consider research and advisory services are better provided by organisations and bodies more focused on cyber security**. While we recognise AEMO's expertise in market operations and its developing role in cyber security, we consider that specific cyber security guidance may be more appropriately delivered by organisations with more specialised cyber expertise - such as the Australian Cyber Security Centre, CSIRO and ANU - which can offer broader national and cross-industry perspectives beyond AEMO's operational focus on the ECGS. Even if AEMO's new function were to operate alongside, rather than replace, existing advisory channels, we do not consider the additional value will justify the likely costs and duplication of effort. In particular, AEMO commissioning 'specialist reports' or similar activities may overlap with work already undertaken by dedicated national cyber bodies, potentially incurring costs without materially improving the quality of advice available to government or industry. AEMO's understanding of gas system risk management planning and the design of Australia's future energy system could be a valuable input into cyber security advice from national bodies, but we consider these national bodies would be better placed to originate guidance.
- **We recognise the value in AEMO facilitating the distribution of critical cyber security information to the market**. We agree that smaller participants may not have the resources to keep track of all relevant cyber information, such as what is

offered by the Australian Signals Directorate,¹ and AEMO's distributor role could make this information accessible. However, as mentioned above we would not support AEMO dedicating resources to originate advice.

- **We encourage the AEMC to reduce scope where benefits are uncertain.** We note a public consultation from 1 July 2027 would focus on costs. This should include limiting unnecessary scope and identifying areas of mutual benefit between NEM arrangements and the proposed ECGS cyber security processes to capture synergies and avoid duplication.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this further, please get in touch with me at isidora.stefanovic@alintaenergy.com.au.

Yours sincerely,

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¹ <https://www.cyber.gov.au/about-us/view-all-content/news-and-media/join-the-cyber-threat-intelligence-sharing-service-through-sentinel>