

# APA

Australia's energy  
infrastructure partner

## AEMO's gas sector cyber security roles and responsibilities rule change

APA Submission

26 February 2026



Ms Anna Collyer  
Chair  
Australian Energy Market Commission

26 February 2026

**RE: Rule change request to embed and formalise AEMO's gas sector cyber security roles and responsibilities under the National Gas Rules (NGR)**

Dear Ms Collyer,

Thank you for the opportunity to comment on the consultation paper for a rule change request to embed and formalise AEMO's gas sector cyber security roles and responsibilities under the NGR (Consultation Paper).

APA is an ASX listed owner, operator, and developer of energy infrastructure assets across Australia. Through a diverse portfolio of assets, we provide energy to customers in every state and territory. As one of Australia's leading energy infrastructure companies, we are keenly interested in policy processes that aim to improve the security and reliability of energy supplies.

We support the Commonwealth Energy Minister's rule change request, as it helps clarify AEMO's cyber security role in the gas sector. This includes both preparing for potential incidents and in any incident response. We agree with the statements in the Consultation Paper that AEMO should not have the power, under the proposed rule changes, to place new cyber security obligations on market participants.

If you have any questions about our submission, please contact John Skinner on 0435 898 022 or [john.skinner2@apa.com.au](mailto:john.skinner2@apa.com.au).

Regards,



**Natalie Lindsay**  
General Manager, Economic Regulation and External Policy