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Australian Energy Market Commission

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Dear Sir or Madam,

Gas cyber security roles and responsibilities for AEMO

AGL welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (**AEMC**) proposals to create new roles and responsibilities for the Australian Energy Market Operator (**AEMO**), as outlined in the *Gas cyber security roles and responsibilities for AEMO Draft Determination* consultation paper.

As previously highlighted in AGL's submissions on this matter,¹ we recognise that the increased digitisation of the electricity and gas markets and the interconnected nature of infrastructure networks expose the system to an exponentially heightened risk of cyber security incidents. As emphasised by several stakeholders, the energy sector and its potential cyber weaknesses is not isolated to the National Electricity Market or the National Gas Market (**NGM**) but also includes the Wholesale Energy Market (**SA WEM**) and Consumer Energy Resources.

AGL supports government's proactive efforts to protect and increase the cyber security resilience of the NGM. We broadly agree with the draft determination to formally embed AEMO's cyber security roles and responsibilities in the National Gas Rules, particularly for Functions One and Two. We also welcome alignment with the *National Electricity Amendment (Cyber Security Roles and Responsibilities) Rule 2024* and see the value of a consistent regulatory approach across electricity and gas markets.

Notwithstanding this, AGL continues to hold concerns regarding potential unintended consequences arising from AEMO's role, particularly where this may create duplication in facilitating the distribution of critical cyber security information to the gas sector.

AEMO will not be the sole agency delivering these functions and so, a risk remains for both duplicating the provision of information to parties as well as potential for the distribution of inconsistent information on an issue between agencies e.g., the *National Cyber Incident Response Board*. While this may be an unlikely scenario, the draft determination still provides the opportunity for this risk to occur. Consequently, AGL strongly recommends agencies that are tasked with this responsibility engage regularly about the information they intend to distribute to industry.

Furthermore, as noted in AGL's submissions dated 07 November 2024 and 27 February 2026, the proportionality of cost recovery for services should also be fairly spread. While AGL acknowledges the fee structure is now clear and will be achieved via leveraging the AEMO's current cost recovery process through participant fees, we do not

¹ AGL submission, Draft rule determination – National Electricity Amendment (Cyber security roles and responsibilities) Rule 2024, 2024: <https://www.aemc.gov.au/sites/default/files/2024-11/7%20AGL.pdf>

AGL submission, Draft rule determination- Gas cyber security roles and responsibilities for AEMO, 2026: <https://www.agl.com.au/content/dam/digital/agl/documents/about-agl/news-centre/2025/260227-agl-response-to-proposed-rule-chan-emma-holloway.pdf>



consider functions such as providing research and advice should be included and paid for by industry due to it not being a direct service to participants. AGL recommends this service be funded via government budget.

Thank you for your invitation to comment on this draft determination. If you have any questions about our submission, please do not hesitate to contact Emma Holloway, Manager Policy and Market Regulation at eholloway@agl.com.au.

Yours sincerely,

Liam Jones

Senior Manager Policy and Market Regulation

About AGL

Proudly Australian since 1837, AGL delivers around 4.6 million gas, electricity, and telecommunications services to our residential, small and large business, and wholesale customers across Australia. AGL operates the largest electricity generation portfolio in Australia of any ASX-listed company, with a total operated generation capacity of almost 8000 MW across Australia. AGL is Australia's largest privately-owned hydro power station operator and operates the largest portfolio of renewables and storage assets of any ASX listed company. Since 2006, AGL has invested billions of dollars in the construction and delivery of over 2 GW of renewable and firming capacity in the National Electricity Market.