

18 June 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' draft determination.

We consider the draft determination broadly addresses key stakeholder feedback:

- **We support the clarification that AEMO's proposed four functions would not impose additional mandatory obligations or increase compliance costs on market participants.** Complementing, rather than duplicating, the role of other agencies and frameworks such as the ACSC and SoCI Act will ensure focus is directed towards AEMO's proposed functions.
- **We re-iterate our support for AEMO to adopt a harmonised approach across its gas and electricity cyber security functions.** We consider this will streamline processes, avoid duplication and reduce costs. As noted in our response to the consultation paper¹, this approach should focus on limiting unnecessary scope and reducing cost.

Noting our support, we make the following recommendation for the Commission's consideration.

- **AEMO's ongoing stewardship of the AESCSF as part of proposed Function 2 should require independent external maturity assessments.** Currently, cyber security maturity assessments may be undertaken on a self-assessment basis, introducing subjectivity and limiting the consistency and comparability of outcomes. We therefore propose AEMO require all participants to undertake independent, external assessments of their cyber security maturity, to support more robust and standardised benchmarking across participants. We do not consider this would impose a material *additional* mandatory obligation, noting that many participants already undertake external assessments.

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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Regulatory Specialist

¹ Alinta Energy response to Consultation Paper, p.1-2.