



26 February 2026

Submission: Rule Change Request – Gas cyber security roles and responsibilities for AEMO

The Australian Pipelines and Gas Association (APGA) represents the owners, operators, designers, constructors and service providers of Australia's pipeline infrastructure. APGA members ensure safe and reliable delivery of over 1,500 PJpa of gas consumed in Australia alongside over 4,500 PJpa of gas for export.

APGA welcomes the opportunity to provide brief feedback on the Australian Energy Market Commission's (AEMC) consultation on embedding and formalising AEMO's gas sector cyber security roles and responsibilities under the National Gas Rules (NGR). APGA considers that the draft rule proposal made by the AEMC is reasonable.

Would harmonising AEMO's cyber security functions across the electricity and gas sector help to ensure a coordinated and strategic approach to cyber security risks?

APGA considers there is benefit in a harmonised approach for AEMO for the gas and electricity sector, where specific cyber security risks are not dissimilar.

All energy assets have specific responsibilities under the Security of Critical Infrastructure Act 2018 (SOCI Act). APGA considers there is particular benefit for AEMO to be a central distribution point for information on identified cyber security threats, risk minimisation strategies, especially where it assists both operators and AEMO to be in compliance with the SOCI Act.

Do you consider that the benefits will outweigh the costs of the proposed solution? Is there anything the Commission could do in designing the rule that would help to minimise the costs and maximise the benefits, e.g. transparency or reporting requirements?

APGA considers that the benefits of the proposed rule likely outweigh the costs, which in the context of AEMO's broader functions are small. APGA looks forward to contributing to AEMO's consultation on how these costs would be reflected in the structure of gas participant fees.

To discuss any of the above feedback further, please contact me on +61 409 489 814 or crafael@apga.org.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Catriona Rafael', with a large, sweeping flourish at the end.

CATRIONA RAFAEL
Head of Policy
Australian Pipelines and Gas Association