



1 May 2026

Sophie Bazzana  
Acting Assistant Secretary  
Department of Home Affairs

Submitted online: <https://www.homeaffairs.gov.au/>

Dear Ms Bazzana,

**Proposed amendments to Ministerial Directions Powers in Part 3 of the Security of Critical Infrastructure (SOCI) Act 2018 – Consultation Paper**

Origin Energy Limited (Origin) welcomes the opportunity to comment on the proposed amendments to the Ministerial Directions powers. The proposed amendments may impose material compliance and implementation costs on critical infrastructure entities, including Origin. For the energy sector, these costs would arise at a time of significant investment to deliver a lower-emissions power system, with potential flow-on impacts for the cost of the transition. Any reforms should therefore be proportionate to the risks being addressed and practical to implement.

Accordingly, Origin supports retaining the intent that amended or new directions powers be used as a last resort. We also welcome the proposed factors the Minister must consider before issuing a direction under Measure 3 (restrictions on the use of high-risk vendors, products or services), including impacts on asset reliability/availability, competition and supplier concentration. We strongly support consultation before any direction is issued, and consider consultation should also extend to the direction's content to ensure it is effective, practical and deliverable within realistic timeframes.

In the energy sector, a direction affecting multiple participants could materially affect the power system. The OEM landscape for key generation and control systems is also limited, which can constrain the availability of commercially and operationally viable alternatives. To support system security and minimise unintended consequences, any direction to an energy sector entity (particularly under Measure 3) should explicitly consider:

- Impacts on power system reliability and security, including outage risk, particularly where a direction applies across multiple participants (for example, to address a systemic, sector-wide vendor risk).
- Technical impacts where new or additional compensating controls are required. Changes to control systems can affect an asset's ability to operate within required technical parameters (i.e. generator performance standards). Where impacts are significant, amendments to performance standards may be required, extending outage durations. Changes may also require testing, further affecting reliability and availability.

These considerations should inform both the content of any direction and the compliance timeframe. Where a direction affects a significant portion of the sector, staged implementation may be needed to minimise power system impacts. In other cases, longer timeframes may be required where compliance involves material engineering changes or extended testing.

Should you have any questions or wish to discuss this submission further, please contact me at [REDACTED]

or on [REDACTED]

Yours sincerely,

[REDACTED]  
[REDACTED]  
Group Manager, Regulatory Policy