



18 November 2022

Cyber and Infrastructure Security Centre
Department of Home Affairs
by email: ci.reforms@homeaffairs.gov.au

Re: Draft Risk Management Program Rules

CitiPower, Powercor and United Energy welcome the opportunity to respond to the Minister for Home Affairs' consultation on the proposed risk management program rules under the amended Security of Critical Infrastructure Act 2018 (the SOCI Act).

Our businesses place great importance on ensuring the security of our networks. We are committed to creating and maintaining a resilient business by having a robust framework with supporting plans that protect our people, assets, facilities and systems as well as minimising impact to our stakeholders.

We would like to thank the Department of Home Affairs (the Department) for its ongoing consultation with industry during the development of amendments to the SOCI Act. We believe the updated draft risk management framework rule balances enhancing security requirements while minimising unnecessary cost to consumers. In particular, the cyber security requirements that allow an entity to comply with a range of appropriate Australian standards and frameworks prioritises a robust and efficient approach to managing cyber security.

We appreciate the additional guidance material that has been provided to industry to assist with interpreting and applying the proposed risk management program rules. As raised in our previous submissions, we continue to reiterate our recommendation that the regulatory framework prescribes a compliance approach that is sufficiently flexible. This will allow entities to use different approaches to demonstrate their initiatives meet the objectives of minimising and mitigating security risks to the level proportionate to the relevant risks and consequences.

We also strongly urge the Department of Home Affairs to coordinate with other agencies who are requesting similar information through a different channel or beginning to develop their own reform on cyber policy. The Department's critical infrastructure reform included over eighteen months of collaboration with industry, cost-benefit analysis of proposed reform, multiple industry townhalls, and external cyber security expert advice to land on the final obligations. This is a rich evidence base, and the final obligations reflect a strong Federal standard. As such, we recommend the Department actively share learnings and outcomes with the State counterparts to avoid duplication and/or misalignment of approach. A uniform approach to cyber security will ensure a strong risk management while also reducing unnecessary costs to consumers through duplicate effort.

Should you have any queries or wish to discuss our submission further please contact Ellen Lukin on [REDACTED]

Yours sincerely,

[REDACTED]

Megan Willcox

**Head of Regulatory Performance and Analysis
CitiPower, Powercor and United Energy**