



23 September 2023

Pilbara ISOCo

Submitted online via: www.pilbaraisoco.com.au

Interim Cyber Security Procedure

Alinta Energy appreciates the opportunity to provide feedback on the Pilbara ISOCo's interim *Cyber Security Procedure* for the North West Interconnected System.

Alinta Energy raises a small number of issues and recommended solutions for your consideration in the table over the page.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this, please contact me on 0417 065 955 or at jacinda.papps@alintaenergy.com.au.

Yours sincerely

Jacinda Papps

General Manager, Regulatory Affairs & Compliance

Topic	Procedure reference	Alinta Energy comment
Obligation to comply with the procedure	2	<p>The procedure places obligations on:</p> <ul style="list-style-type: none"> • Covered Networks; • The ISO Control Desk; • Registered NSPs that are not excluded networks or an integrated mining network; • ESS providers; and • Integrated mining networks. <p>The procedure also encourages any controller or NSP not covered by the above to adopt AESCSF.</p> <p>Alinta Energy considers that a CPC Facility could have a material impact on the NWIS should a cyber event occur (depending on the configuration). Given this, consideration should be given to expanding the procedure to include a CPC Facility as a mandatory requirement rather than rely on the voluntary section 2.1 for this facility type.</p>
Reporting obligations	2.7.4(a)	<p>Section 2.7.4(a) requires a NWIS Cyber Security Entity, by no later than 30 June each year, provide the ISO by email with a report in writing containing details of any Cyber Security Incident that has occurred in relation to, as the case may be, the relevant network, facility or ISO control desk (other than an incident report in accordance with section 2.8.1).</p> <p>Alinta Energy considers that this obligation simply adds additional compliance cost and regulatory burden for no demonstrated benefit. We recommend that the ISOCO sets out what it intends to do with this information and identifies the relative benefits from receiving this information. If there are no demonstrable benefits then Alinta Energy recommends that this obligation is removed.</p>