Extract of Ausgrid response: Review of Power System Data Communication Standard

Subject: Ausgrid response: Review of Power System Data Communication Standard

Dear Review Team,

Our feedback is for section 4 - Security.

It might streamline compliance with the standard if configurations that provide compliance are specified. e.g. layer of tunnelling for VPNs, crypto algorithms (vs the ASD listing) and minimum compensating controls.

An example of where it might be good to be prescriptive is to say that the security controls must be consistent end to end. e.g. WAN encryption must be from AEMO control centre to NSP Intervening facility.

A possible scenario is that the NSP WAN is encrypted by an externally managed ICT system and is therefore vulnerable to eavesdropping and man in the middle attacks. Being more prescriptive about who owns the keys for a particular set of cryptographic algorithms, that are applied in a particular way to establish secure end to end comms, may drive a different solution. This might ensure the interpretation of "reasonable endeavours" doesn't result in an unexpected weakness in AEMO's WAN and control systems.

Regards,

Cameron Shortland

Manager Control System Services | Asset Data & Systems