



August 10, 2022





Document control

Template Control

Template Version	Last Updated	Owner
1.0	29/11/2021	Matt Lange

Table 1: Revision Record

Version	Date	Updated By	Changes Made
1.0	29/11/2021	Ed Shaw	First draft (1.0)

Table 2: Review and Distribution

Name	Role	Action	Sections
Nives Matosin	Manager Regulatory	Review of first draft (1.0)	
Ed Shaw	SoCI Program Director	Review of first draft (1.0)	
James Ditzell	Cybersecurity Program Director	Review of first draft (1.0)	
Stuart Davis	General Manager Operations & Maintenance	Review of first draft (1.0)	
Matt Lange	General Manager Technology Security & Risk	Review of first draft (1.0)	

Table 3: Approvals

Name	Role	Approval	Date Approved
Adam Watson	Chief Finance Officer		dd/mm/yyyy



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1 Abbreviations

Abbreviated Key Term	Definition
CI	Critical Infrastructure
AESCSF	Australian Energy Sector Cyber Security Framework
SoCI	Security of Critical Infrastructure



2 Executive summary

2.1 Program summary

The table below provides a summary of the program discussed within this business case. Additional and supporting information is provided throughout this document.					
	С	ommercial I	n Confidenc	ce	



	Commercial In Confidence
Estimated cost of recommended option	The estimated cost of the recommended option over the Access Arrangement period is \$17.07 million.
	Commercial In Confidence

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Commercial In Confidence	



3 Context

This section provides key contextual information and drivers for the business case.

3.1	Background	
		Commercial In Confidence



Commercial In Confidence	



Commercial In Confidence	



3.2	Pu	rp	05	e

The purpose of APA's program is to meet the following key objectives:		
		Commercial In Confidence
4 4.1	Risk assessme	ent
		Commercial In Confidence



	Commercial In Confidence
4.2	Risk assessments and comparison to target risk levels
	Commercial In Confidence



Commercial In Confidence	



	Commercial In Confidence
4.3 Investment need and	control design
	Commercial In Confidence

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Commercial In Confidence	



Commercial In Confidence	



5 Options

5.1 Overview of options		
	Commercial In Confidence	
need	section provides an overview of the options we have considered to address the identified business in order to meet compliance with the SoCI Act. Each option represents a combination of initiatives ired to complete the program of work.	
	Commercial In Confidence	
5.2	Overview of cost models	
	Commercial In Confidence	



	Commercial In Confidence
5.3 Option #1 <i>Maintain cul</i>	rrent capability
	Carara araigl la Carafidan ao
	Commercial In Confidence



Commercial In Confidence	



	Commercial In Confidence
5.4	Option #2 Risk-based compliance
	Commercial In Confidence



Commercial In Confidence	



Commercial In Confidence	





Table 5.5 - Cost summary of option 2 (2023 – 2027, real \$m)

Workstream	CAPEX (\$m)	OPEX (\$m)						
Commercial In Confidence								
Total	15.62	1.46						
Total	15.62	1.46						

Commercial In Confidence



Commercial In Confidence	



5.5 Option #3 Risk appetite and compliance Commercial In Confidence



Commercial In Confidence	



Commercial In Confidence	



6 Assessment and recommended option

6.1	Assessment of options
	Commercial In Confidence
6.2	Recommended option
	Commercial In Confidence
Optic manr	2 is the recommended option for APA to meet its SoCI Act obligations in a prudent and efficient .
	Commercial In Confidence

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Commercial In Confidence



7 Assumptions, Constraints & Dependencies

This section provides assumptions, constrains and dependencies which are associated with the delivery of this program.

7.1 Assumptions			
The assumptions for the initial program were as follows:			
	Commercial In Confidence		
7.2 Constrain	ts		
The Constraints fo	r this program are as follows:		
	Commercial In Confidence		
7.3 Depender The dependencies	ncies for this program are as follows:		
	Commercial In Confidence		



8 Appendices

8.1 Appendix A - Domain and Obligations Analysis

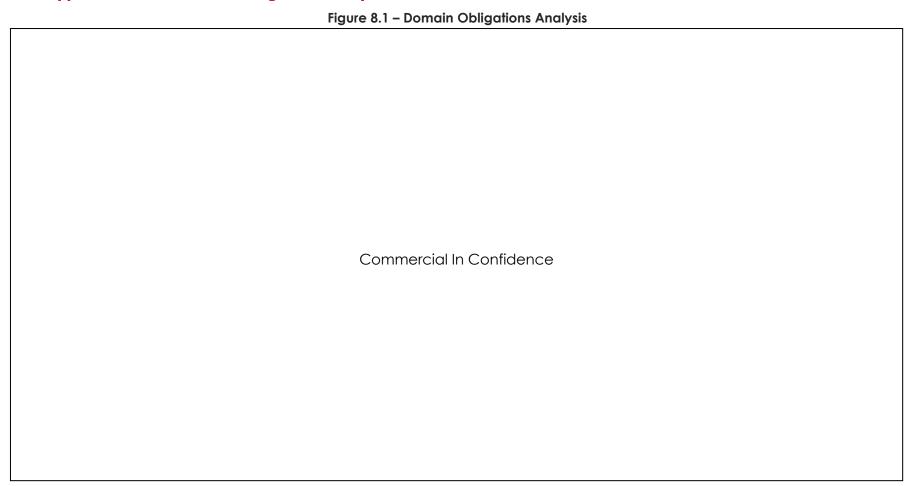




Figure 8.2 – Domain and Rules Analysis				
Commercial In Confidence				

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apa

8.2 Appendix B - Level 1 Risk Assessment

See attached sample of individual facility security assessment

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8.3 Appendix C - Level 2 Risk Assessment

See attached APA Physical Security Threat and Risk Assessment Report and APA Physical Security Risk Register

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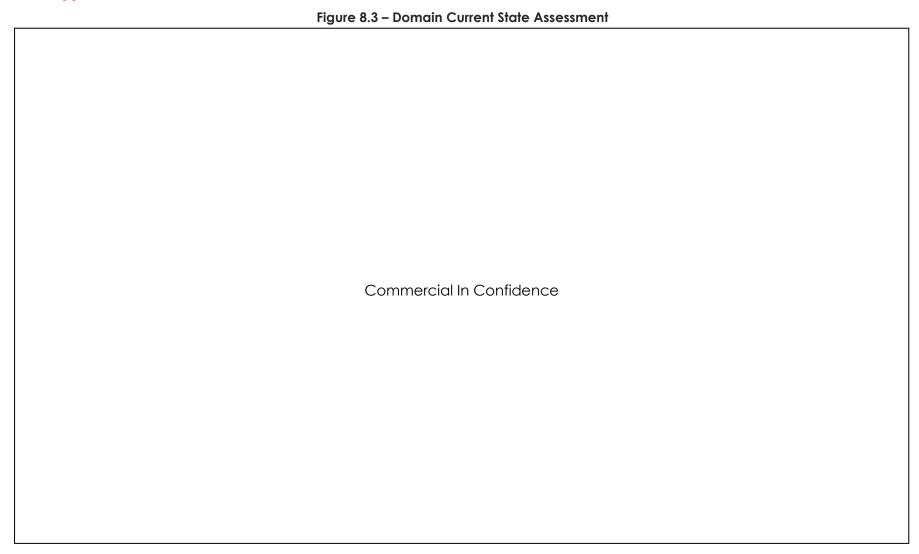
apa

8.4 Appendix D - Level 3 Risk Assessment

See attached APA SoCI Enterprise Material Risk Register



8.5 Appendix E - APA Current State Assessment



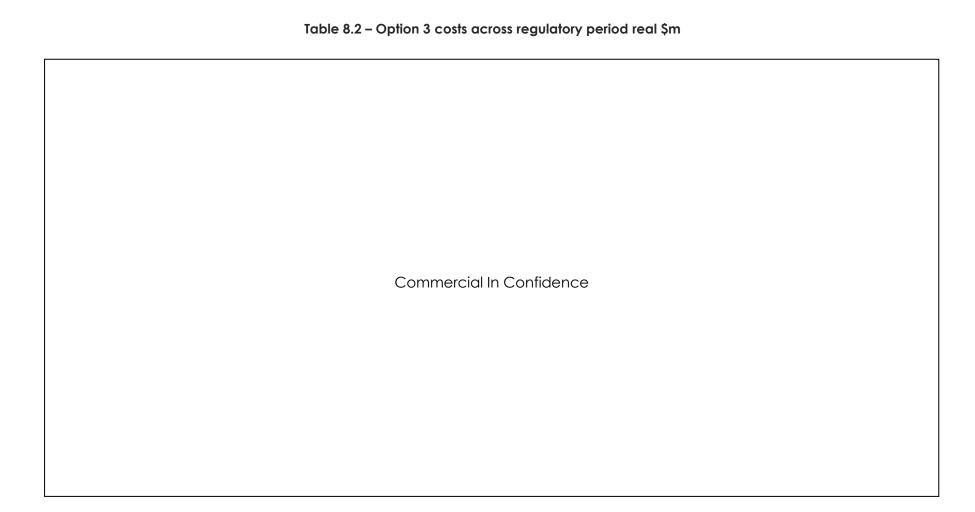


8.6 Appendix F - Option 2 costs in regulatory period

Table 8.1 – Option 2 costs across regulatory period real \$m Commercial In Confidence

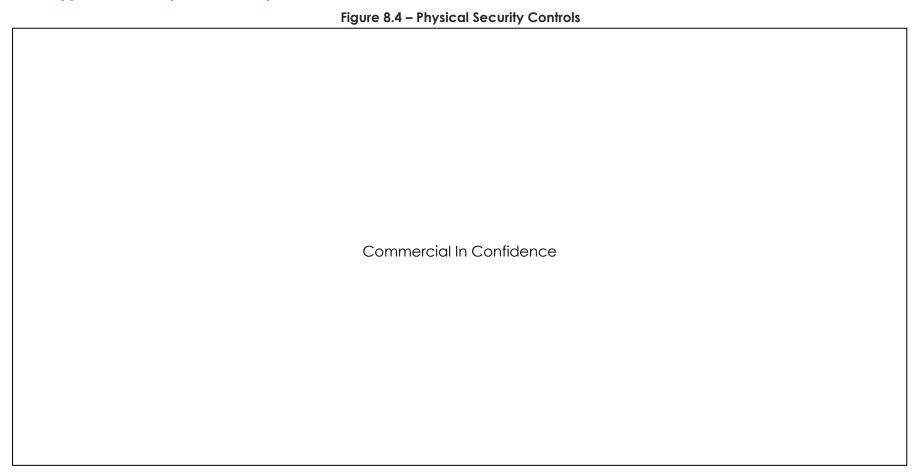


8.7 Appendix G - Option 3 costs in regulatory period



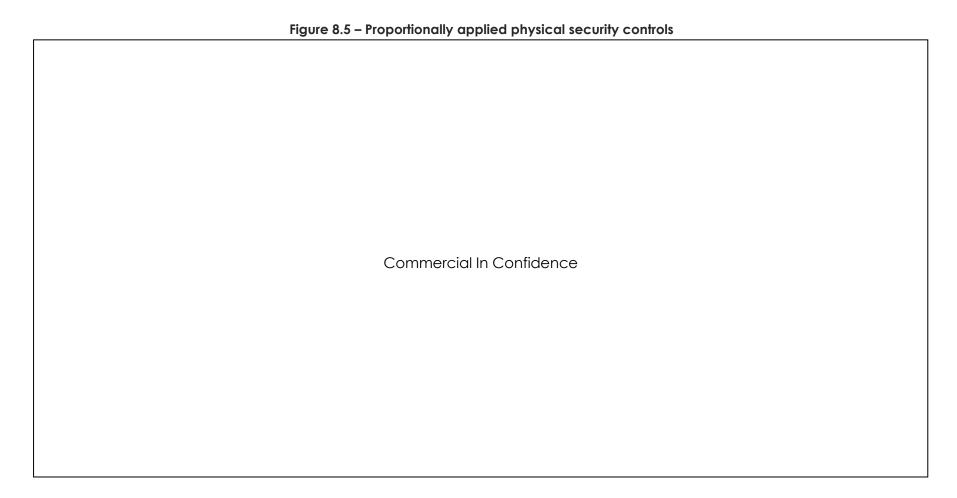


8.8 Appendix H - Physical security control





8.9 Appendix I - Physical security controls





8.10 Appendix J Enterprise Risk Matrix - Likelihood Table and 5x5 Risk Matrix

Figure 8.6 – Likelihood Table

Level	Descriptor Description*		Frequency*
5	Frequent	Expected to occur on a regular basis and many times	Many times in 1yr
4	4 Occasional May occur occasionally or in many circumstances		Every 2yrs
3	Unlikely	Unlikely to occur but possible when certain circumstances prevail	Every 5yrs
2	Remote	Not anticipated but may occur if certain abnormal circumstances prevail	Every 20yrs
1	Rare	Conceivable, but has not been known to arise previously	Every 50yrs

Figure 8.7 – 5x5 Risk Matrix

		Impact (consequences)				
		1. Minimal	2. Minor	3. Significant	4. Major	5. Catastrophic
	Frequent	Low	Moderate	High	Extreme	Extreme
70	Occasional	Low	Low	Moderate	High	Extreme
Likelihood	Unlikely	Negligible	Low	Moderate	High	High
_	Remote	Negligible	Negligible	Low	Moderate	High
	Rare	Negligible	Negligible	Negligible	Low	Moderate



8.11 Appendix K - Energy sector cyber security events and trends

