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Your submission for this review:

1. Do you consider the applicable critical infrastructure reporting manual and audit guidelines contain significant issues in complying the requirements in these documents, and if so, what are these issues? 15 a. I do not observe any significant issues presented in the Critical Infrastructure Reporting Manual, or the Audit Guidelines. 2. Do you agree with our proposal to retain the maintenance of the distribution/transmission system conditions? 18 a. I agree with the proposed retention of this condition which now is enumerated as 2.1 in the current proposed licence conditions. 3. Do you agree with our proposal to retain the exception to the maintenance condition allowing for a protocol to be agreed with the CISC? 18 a. I agree. 4. Do you agree with our proposal to maintain the requirements for operation and control of the transmission/distribution system? 20 a. I agree. 5. Do you agree with our proposal to amend the security clearance requirements by allowing a network operator to choose between NV1 security clearance or the background checks under the AusCheck scheme? 23 a. I agree, however noting that the current proposed version (19/12/2024) purely stipulates background check and not AusCheck scheme. I recommend this be specified in clause 2.6.3.b, as background check may be open to interpretation. 6. Do you agree with our proposal to retain the data security requirements? 25 a. I agree. 7. Do you agree with our proposal to remove the Bulk Personal Data requirements? 25 a. Yes, it has been my opinion that Bulk Personal Data records are well regulated within the scope of the Privacy Act 1988, its related amendments, and the Australian Privacy Principles. 8. Do you agree with our proposal to replace the data agreement provisions with a new provision enabling the Commonwealth Representative to agree to a Protocol? 26 a. I agree. 9. Do you agree with our proposal to retain the compliance reporting and auditing requirements? 28 a. I agree. 10. Are there any additional comments you wish to make on the draft licence conditions or the draft report? 28 a. It appears that the draft licence conditions are a well-considered improvement over the prior licence conditions, in terms of practicality of application and ease of interpretation.