



July 21, 2017

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON, M4P 1E4
Dear Ms. Walli:

Re: Protecting Privacy of Personal Information and the Reliable Operation of the Smart Grid in Ontario – Board File No. EB-2013-0032

On February 11, 2016, the Ontario Energy Board (OEB) initiated a consultation to review the cyber security of the non-bulk electrical grid and associated business systems in Ontario. On June 1, 2017, the OEB release OEB staff's report to the OEB on a *Proposed Cyber Security Framework and Supporting Tools for Electricity and Natural Gas Distributors* and invited comments from interested stakeholders by July 15, 2017.

Oakville Hydro appreciates the opportunity to provide its comments on this important subject and apologizes for the delay in filing its comments.

Background

Oakville Hydro has established an IT industry standard matrix to assess the cyber security environment, called Control Objectives for Information Technologies (COBIT) - Governance Framework, to establish and assess the current state of Cyber Security Maturity. Oakville Hydro's COBIT framework is a hybrid, built around the following standards and practices:

- National Institute of Standards and Technology (NIST);
- North American Electric Reliability Corporation (NERC);
- ISO/IEC 27001 - Information security management;
- Best practices from a number of other industries in relation to Cyber Security;
- CSC – Critical Security Controls based on SANS Institute, which defines Oakville Hydro's internal scorecard.

Oakville Hydro has established levels for the control of IT activities surrounding security and governance within the Oakville Hydro environment. The controls are consolidated to address the key areas of concern. The controls and associated security continues to mature and evolve with

changing cyber threats and represents an overview of the position of Oakville Hydro based on a set of easy to understand controls.

Oakville Hydro's Feedback & Proposals

In this OEB initiative, Oakville Hydro fully supports the work the OEB has completed to provide a framework and supporting tools for the electricity and gas distributors. Oakville Hydro took an active part in the OEB Cyber Security Working Group to support this initiative.

After a full review of the white paper, tools and implementation guidance, Oakville Hydro submits the following comments and proposals:

- Risk Profile Tool: The tool provided supports the sizing of distribution companies and defines the risks associated with the different business areas of the business in how they relate to potential for attack.
- Self-Assessment Questionnaire (SAQ): This tool provides a very detailed review of the controls necessary to protect the systems based on the risk factor determined in the Risk Profile Tool. Oakville Hydro believes that the controls are very prescriptive and it notes that some of the controls may not apply to all Local Distribution Companies (LDCs). A control can be defined as "Not Applicable". However, it is left up to the LDC to determine whether the control applies. During collaboration exercises, LDC's may find that some controls can be removed while others, that were originally dismissed, should now be added.

In addition, the ability to mark a control as "Not Applicable" may result in an LDC being improperly tagged/categorized by this assessment. For example, LDCs that own their own transformer stations could be categorized the same as those that do not own their own transformer stations depending on how the questions are answered.

- Priority: Oakville Hydro notes that there do not appear to be any priority controls defined that would support priority of investment. LDCs require more clarity regarding the key controls that should be implemented in the first phases of the plan.
 - Resources: Oakville Hydro notes that there is a high level of complexity in the tools provided and has concerns that smaller LDC's may not have the resources required to complete a comprehensive assessment.
 - Timing: The timing for the interim and annual reporting have been well defined. However, LDCs require more clarity regarding the OEB expectations with respect to the continuous improvement scale. Additional clarity would assist LDCS in assessing the resources required to achieve the expected improvements over time.
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- Self-Assessment: Oakville Hydro believes that the individual that is responsible for signing off on the self-assessment certificate will require an easy to understand tool to assist them in the review of the controls and allow them to signoff. In order to facilitate this, Oakville Hydro suggests that the complexity of the controls be consolidated into a smaller number of controls that when met will meet multiple individual detailed controls.

Oakville Hydro appreciates having had the opportunity to participate in the Cyber Security Working Group and to provide its comments on OEB staff's white paper. If you have any questions or require any additional information, please do not hesitate to contact me.

Sincerely,

Original Signed By

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