



January 18, 2018

Ontario Energy Board

2300 Yonge Street, 27th Floor

Toronto, ON M4P 1E4

Attn: Ms. K. Walli
Board Secretary

Dear Sir/Madam

Re: **EB-2016-0032**

Proposed Amendments to the Distribution System Code Concerning Cyber Security

The Electricity Distributors Association (EDA) is the voice of Ontario's local electricity distribution sector, which consists of municipally and privately owned local distribution companies (LDCs). The distribution sector delivers electricity to 5 million residential, commercial, industrial and institutional customers throughout the province. The sector employs 10,000 people directly and holds \$19 billion in assets; it has \$1.9 billion in annual capital spending and \$1.6 billion in annual operational spending; and makes hundreds of millions in direct contributions to both municipal and provincial revenues.

Ontario's LDCs acknowledge their ongoing responsibility to consumers to adhere to Cyber Security best practices, and, to appropriately address their level of Cyber Security and its 'maturity'. The EDA has been encouraged by both the Ontario Energy Board's (OEB) approach to pacing the development of the Ontario Cyber Security Framework (Framework) and its desire to engage the industry in its ongoing management. The EDA notes the inherent advantages of a scalable approach and the ability to customize the provision of Cyber Security pursuant to Framework. The EDA also looks forward to addressing the ongoing governance of the Framework and to participating in the OEB's development of the appropriate reporting requirements.

The comments provided at Attachment A reflect the input received from a significant pool of LDC subject matter experts across Ontario who comprise EDA's councils and are representative of the EDA's membership. Please refer any questions or comments in the abovenamed matter to Kathi Farmer, Senior Regulatory Affairs Advisor at kfarmer@eda-on.ca or 905.265.5333.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Teresa Sarkesian', is written in black ink.

Teresa Sarkesian
President and Chief Executive Officer

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Electricity Distributors Association