

**Ontario Energy
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BY EMAIL

November 25, 2015

Ontario Energy Board

P.O. Box 2319

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2300 Yonge Street

Toronto ON M4P 1E4

Boardsec@ontarioenergyboard.ca

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: OEB STAFF INTERROGATORIES

**APPLICATION FOR AN EXEMPTION FROM SECTION 2.2.2 OF THE
AFFILIATE RELATIONSHIPS CODE FOR GAS UTILITIES OEB STAFF
SUBMISSION.**

EB-2015-0233

Please find enclosed the interrogatories of OEB Staff in the above referenced application.

Yours truly,

Original Signed By

Ronak Mozayyan

Project Advisor, Facilities and Infrastructure

cc. All Intervenors in EB-2015-0233



ONTARIO ENERGY BOARD

OEB Staff Interrogatories

Application by Enbridge Gas Distribution Inc. (EGDI) for an Exemption from Section 2.2.2 of the Affiliate Relationships Code for Gas Utilities.

EB-2015-0233

November 25, 2015

INTERROGATORY NO. 1

Reference: Application, paragraph 3

- i. Please provide additional explanation with respect to “some ITSS services” that have been in place since January 1, 2015 between EGDI and Enbridge Inc. Are these ITSS service outside the terms and conditions of the Intercompany Services Agreement (ISA)?
- ii. The ISA governing the subject relationship between EGDI and Enbridge Inc. was executed on January 1, 2011 and will terminate on December 31, 2015. Will EGDI's file a draft ISA with the OEB prior to the OEB's decision on the exemption, or an executed ISA after the OEB's approval of the exemption?

INTERROGATORY NO. 2

Reference: Application, paragraph 4

In paragraph 4, EGDI states “In the course of carrying out certain ITSS services, ITSS Contractors would have limited an incidental access to confidential information.” In paragraphs 9 to 13 EGDI describes scenario's that may result in incidental access to confidential customer information. Please clarify whether EGDI has a process or plans to implement a process that records instances where ITSS Contractors have had access to confidential customer information (as described in the application).

INTERROGATORY NO. 3

Reference: Application, paragraph 10

- i. Please confirm that ITSS Contractors will only have access to EGDI customer information when there is a system issue, required maintenance, or an investigation as authorized by EGDI. Will ITSS Contractors inform and require permission from EGDI for any required maintenance?
- ii. At the above reference, EGDI states that “... the ITSS Contractor will have access at most to a snap shot of a customer's information....” Please clarify whether the “snap shot” of a customer's information could include financial information such as a customer's bank account information or credit card details. If such access can be had from the snap shot, how does EGDI intend to protect its customer's financial information?

INTERROGATORY NO. 4

Reference: Application, paragraphs 9 - 13

In the last two years has EGD experienced any instances where it's IT employees or IT contractors have breached organizational protocols and have incorrectly accessed or misused confidential customer information. If such breaches have occurred, please describe the situation and how EGD dealt with the situations.

INTERROGATORY NO. 5

Reference: Application, paragraph 13

- i. Please provide more detail on how viewing of customer information as part of an investigation would be "very rare".
- ii. Please provide more detail on how EGD investigations done by ITSS Contractors are "strictly controlled and managed by Enbridge Gas personnel..." to ensure integrity of customer information.
- iii. Please provide more detail on the "confidentiality undertaking" that is executed by security personnel. Is the confidentiality undertaking only applicable to security personnel involved in an investigation, or all ITSS Contractors dealing with Service Management, Productivity Services and Security Operations matters?
- iv. Please clarify how the customer information retrieved from conducting forensic investigation will be treated and whether this information is stored with ITSS Contractors during and after the investigation.
- v. Please provide an example screen shot, similar to that provided in Appendix C and Appendix D of the application, of a forensic investigation event that required viewing of EGD customer information.

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