

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, Ontario M4P 1E4
Attention: Board Secretary

January 18, 2018

Re. Protecting Privacy of Personal Information and the Reliable Operation of the Smart Grid in Ontario - Board File No. EB-2016-0032

Utilities Standards Forum (USF) is a forum of Ontario electricity Distributor Members for collaboration and mutual support. Incorporated in 2005, this non-profit has 53 Distributor Members, and operates Forums that support the Engineering, IT, and Regulatory departments. (Distributor Member List can be found in Appendix A).

The GridSmartCity Cooperative's (GSC) mandate is to increase efficiency and customer and shareholder value within our 13 Local Distribution Company (LDC) territories, while benefitting the Ontario electricity sector as a whole. Our member utilities synergize their operations through a cooperative approach to buying and numerous special initiatives. (Member List can be found in Appendix B)

USF and GSC have reviewed the December 6, 2017 Ontario Cyber Security Framework (including the updated Inherent Risk Profile Tool and Self-Assessment Questionnaire), the December 20, 2017 Notice of Proposal to Amend a Code, and the December 31, 2017 Protecting Privacy of Personal Information and the Reliable Operation of the Smart Grid in Ontario – Cyber Security Framework Assessment Report on the Cyber Security Framework and Implementation (all together being referenced as the Framework). We have reviewed these documents against those shared by the OEB June 1, 2017. We appreciate having the opportunity to provide comments for your consideration.



Comments

1) Amendment to the DSC

USF and GSC accept the proposed amendments to the Distribution System Code, the definitions of “Cyber Security”, and “Cyber Security Framework”, and the requirement to report on the status of the distributor’s cyber security readiness.

2) Changes to the Framework

We recognize and support the changes to 1) the Risk Profile Tool, the addition of transition ranges between risk levels that allow distributors to choose which level they will meet based on their unique situation, and 2) the Self-Assessment Questionnaire, the categorization of the security controls into priority levels, 0 through 3.

3) Cost Recovery

We agree that with improvements made to the collective cyber security posture of the industry, there will be benefits to the industry and the customers served. We recognize that the use of industry best practices pertaining to cyber security and the protection of operations, network systems, and confidential consumer information has been an expectation for distributors under the Renewed Regulatory Framework. However, the challenge for LDC’s to recover the increased costs associated with compliance to the new Framework remains.

While the pooling of resources through the USF and GSC network to meet the Framework reduces the cost of developing solutions, it is true that all templates and common tools require customization, implementation, training and upkeep at the individual level. Moreover, the threat landscape continues to evolve, as will the Framework and maturity level requirement. As such, the additional costs to support compliance with the Framework should be acknowledged and an avenue for recovery should be defined.

We confirm the Focus Group’s estimation that it will take the effort of 1 full time equivalent 2 years for a Low risk LDC, and 2 to 4 years for a Medium risk LDC to achieve MIL1 compliance (Initial practices are performed but may be ad hoc). For most LDC’s, this will be a net new FTE, leading to significant additional operational and administrative costs will be incurred.

4) Delay of the Framework’s Release

USF and GSC urge the OEB to not delay the release of the amended DSC and finalized Framework. Momentum across the industry has been built on this file over the past 18 months, particularly since the June 1, 2017 release of the Staff Report to the Board - On a Proposed Cyber Security Framework and Supporting Tools for the Electricity and Natural Gas Distributors, and accompanying Framework. This motivation to act would be lost if the Framework was not activated by June 2018.

Through USF, representatives from 38 LDC’s attended formal training sessions on the Framework in November 2017. Further still, many executive teams and Board of Directors are mindful of the coming requirements. However, until the regulation becomes a reality, with the requirements a certainty rather than a draft, the gap assessments and commencement of the work toward compliance is at a

hesitant pace. If there are any additional postponements, at many LDC's, the knowledge and interest to work on cyber security will be replaced with other pressing priorities. Therefore, upon a delayed release, another round of awareness, knowledge and motivation building will be necessary.

USF and GSC understand that many elements of the Framework are under development. Though, we believe that the starting points, the risk levels and security controls and reporting requirements for the first few years are defined in enough detail to move ahead.

5) On Going Developments and Evolution of the Framework

There are a number of essential components of the Framework yet to be developed. This includes the information sharing groups, certification requirements, and audit provisions. Members of USF and GSC appreciate the opportunity to continue to provide stakeholder input and feedback on how to implement these initiatives.

Thank you for your consideration of our comments. Feel free to contact Lori Gallagher, USF Executive Director at lgallagher@utilitiesstandardsforum.ca, 519-803-3532 with any follow up.

Sincerely,



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Appendix A

Utilities Standards Forum Distributor Member List as of January 1, 2018

1. Alectra Utilities Corp.
2. Algoma Power Inc.
3. Atikokan Hydro Inc.
4. Bluewater Power Distribution Corp.
5. Burlington Hydro Inc.
6. Canadian Niagara Power Inc.
7. Centre Wellington Hydro Ltd.
8. Chappleau Public Utilities Corp.
9. Collus PowerStream Corp.
10. Cornwall Street Railway Light and Power Company Ltd.
11. E.L.K. Energy Inc.
12. Energy + Inc.
13. Entegrus - Powerlines Inc.
14. EnWin Utilities Ltd.
15. Erie Thames Powerlines Corp.
16. Espanola Regional Hydro Distribution Corp.
17. Essex Powerlines Corp.
18. Festival Hydro Inc.
19. Fort Frances Power Corp.
20. Greater Sudbury Hydro Inc.
21. Grimsby Power Inc.
22. Guelph Hydro Electric System Inc.
23. Hearst Power Distribution Company Ltd.
24. InnPower Corp.
25. Kenora Hydro Electric Corporation Ltd.
26. Kingston Hydro Corp.
27. Kitchener-Wilmot Hydro Inc.
28. Lakefront Utilities Inc.
29. Lakeland Power Distribution Ltd.
30. Midland Power Utility Corp.
31. Milton Hydro Distribution Inc.
32. Newmarket-Tay Power Distribution Ltd.
33. Niagara Peninsula Energy Inc.
34. Niagara-on-the-Lake Hydro Inc.
35. North Bay Hydro Distribution Ltd.
36. Northern Ontario Wires Inc.
37. Oakville Hydro Electricity Distribution Inc.
38. Orangeville Hydro Ltd.
39. Orillia Power Distribution Corp.
40. Oshawa PUC Networks Inc.
41. Ottawa River Power Corp.
42. PUC Distribution Inc.
43. Renfrew Hydro Inc.
44. Sioux Lookout Hydro Inc.
45. Thunder Bay Hydro Electricity Distribution Inc.
46. Tillsonburg Hydro Inc.
47. Toronto Hydro Electric Systems Ltd.
48. Wasaga Distribution Inc.
49. Waterloo North Hydro Inc.
50. Welland Hydro Electric System Corp.
51. Wellington North Power Inc.
52. West Coast Huron Energy Inc.
53. Westario Power Inc.

Appendix B

GridSmartCity Cooperative's Member List as of January 1, 2018

1. Brantford Power Inc.
2. Burlington Hydro Inc.
3. Energy + Inc.
4. EnWin Utilities Ltd.
5. Essex Powerlines Corp.
6. Halton Hills Hydro Inc.
7. Kingston Hydro Corp.
8. Kitchener-Wilmot Hydro Inc.
9. Milton Hydro Distribution Inc.
10. Niagara Peninsula Energy Inc.
11. Oakville Hydro Electricity Distribution Inc.
12. Waterloo North Hydro Inc.
13. Welland Hydro Electric System Corp.