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Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Attention: Board Secretary

October 12, 2018

Re: EB-2016-0032 – Proposed Cyber Security Readiness Report & Amendments to Electricity Reporting and Record Keeping Requirements (RRR)

PUC Distribution has reviewed the September 20, 2018 Proposed Cyber Security Readiness & Amendments to Electricity Reporting and Record Keeping Requirements as issued by the OEB. We have reviewed these documents against those already shared in support of the Ontario Cyber Security Framework and reporting cyber security readiness. We appreciate having the opportunity to provide comments for your consideration.

Comments:

Appendix A – Part 3 ACKNOWLEDGEMENT OF STATUS

Risk Profile – High, Medium, Low

1. How would the OEB like the LDC to respond if the Risk Profile score is in-between? Based on the Risk Profile Tool, a transitional zone exists.

Status of Implementation of Control Objectives Consistent with my Organization's Risk Profile

2. Is the LDC to select more than one of the options listed?
3. If the LDC indicates a 3 year plan and this changes later to a 4 year plan how is this viewed by the OEB?
4. Is there an expected implementation timeframe that will be acceptable to the OEB?

*Extract from the **Ontario-Cyber-Security-Framework-Implementation-Report-20171231***

There will be a specified period of time allocated for the LDCs to attain the initial achievement levels. And then from there, as appropriate, maturity progress will be required (i.e., MIL1 to MIL2/3) over time.

Low-Risk Focus Group:

Members of Low-Risk Focus Group estimated that it would take approximately two years to transition their organizations from their current achievement level in 2017 to reach an initial MIL1 achievement level. There was an expectation that this effort would require at least 2000 man-hours or approximately one full-time equivalent resource working throughout the two years to achieve this target.

Medium Risk Focus Group:

Members of Medium Risk Focus Group estimated that transitioning their organizations from 2017 levels to an initial MIL1 achievement level would require two to four years to accomplish. There was some discussion by this group of needing to balance the cost of implementing controls against the risk each organization was willing to accept. The extent to which an organization was willing to accept a certain level of risk would have a significant impact on the length of time needed to achieve the target MIL1 level.

Appendix A - Part 4 - SUPPORTING INFORMATION – CYBER SECURITY

Question 4: Do you actively participate in one or more of the IESO's information sharing services?

5. PUC is of the understanding that the IESO is currently in the development phase of information sharing services and as such will be providing details at a later date. Can this be confirmed?