

April 4, 2019

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Notice of Proposed Amendments
Natural Gas Reporting and Record Keeping Requirements
OEB File No. EB-2016-0032 (Cyber Security Framework)**

Following are the submissions of Enbridge Gas Inc. on the proposed amendments to the Natural Gas Reporting and Record Keeping Requirements (RRR) to establish regulatory requirements for natural gas utilities to provide the Ontario Energy Board (OEB) with information on the actions they are taking relative to their cyber security readiness.

The proposed RRR amendments require that each utility report to the OEB on the status of cyber security readiness referencing its Cyber Security Program, at such times and in such a manner as may be directed by the OEB.

Amending Section 1.2 of the RRR Rule to include the sentence “Cyber Security includes both electronic and physical security” appears to be a duplication of the intent of the first sentence in the definition of cyber security and may only add confusion. The second sentence in the proposed definition of cyber security could be removed or the definition could be clarified as:

“Cyber Security” means a body of technologies, processes, and practices designed to protect networks, computers, programs, data and personal information from attack, damage or unauthorized access from both electronic and/or physical sources.

The OEB has proposed that self-certification of cyber security capability by utilities would be required annually starting April 30, 2020. It would be more reflective of internal protocols if the proposed amendment to Section 2.1 of the RRR Rule to require a self-certification statement on cyber security readiness be signed by the Chief Executive Officer was revised to also require that the self-certification statement be signed by the chief information security officer.

Enbridge fully supports the OEB's intention to not disclose the self-certification status of gas utilities as part of public filings by treating the reports as confidential and segregating them from other records. Enbridge also agrees that access to such information should be limited to individuals within the OEB who require this information as part of their duties and work assignments.

Enbridge submits that it would be useful to understand how long the OEB intends to retain the annual cyber security-related filings in its records.

Should you have any questions on this submission, please do not hesitate to contact me.

Yours truly,

[Original Signed By]

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