SEC Interrogatory #109

Interrogatory

Reference: D3-1-2, p.2

With respect to Cyber Security – CSA N290.7 Project:

a. Please provide a breakdown of the estimated cost of $40.7M.
b. Please provide the most recent business case for the project.

Response

a) As noted at Ex. D3-1-2, note 5, Canadian Standard Association ("CSA") N290.7 refers to an ongoing cyber security compliance program that combines multiple distinct projects to address issued requirements as well as estimated amounts in anticipation of future requirements of the Canadian Nuclear Safety Commission ("CNSC"). This includes compliance with CSA N290.7-14, issued in 2014. As part of the CSA N290.7 program, OPG achieved compliance to this standard by November 2019, when it was made a condition of OPG's operating licenses by the CNSC.

The CNSC has also directed OPG to comply with the new CSA N290.7-21 standard, a revision to CSA N290.7-14. The revised standard was originally expected to be issued in 2021, and is now expected to be released by early 2022. The costs in 2021-2025 reflect estimates of complying with the anticipated requirements of the revised standard.

A breakdown of the estimated cost of $40.7M is provided below.

Chart 1
Projects related to CSA Cyber security standards
CSA N290.7-14 and CSNA N290.7-21 ($M)

Project	Name	Description	Life to Date In-Service[1]	Future Expenditures[2]	Total
82924	CSA N290.7-14 Standard Assessment Project	Initial Assessment of Standard and Gap analysis. Governance Changes.	$3.8	N/A	$3.8
83690	PNGS N290.7 Remediation	Remediation of Pickering NGS	$3.0	$0.8	$3.8
83800	DNGS N290.7 Remediation	Remediation of Darlington NGS	$4.4	$0.7	$5.1
83692	Physical Security N290.7 Remediation	Remediation of Nuclear Physical Security Systems	$1.1	$0.6	$1.7
83820	Nuclear Supporting Equipment N290.7 Remediation	Remediation of common systems across OPG Nuclear	$2.1	$0.4	$2.5
86251	CSA N290.7-21 Standard	Assessment and implementation of new standard.	N/A	$23.9	$23.9
					$40.7

b) See Attachment 1.

[1] In-service amounts up to December 31, 2019.
[2] 2020 onwards.