



BY EMAIL AND WEB POSTING

March 12, 2025

**To: All Licensed Electricity Distributors
All Licensed Electricity Transmitters
Independent Electricity System Operator**

Re: Independent Cyber Security Assessment Requirements

In a letter dated [December 16, 2024](#), the Ontario Energy Board (OEB) released [version 2.0 of the Ontario Cyber Security Standard](#) (Standard), which included requirements for licensed electricity distributors and transmitters (collectively referred to as utilities) to periodically report the results of an independent cyber security assessment based on the [Ontario Cyber Security Framework \(OCSF\)](#) to the OEB. This letter provides additional information and guidance for utilities including the reporting schedule for utilities to submit their assessment reports and guidance on how to complete the cybersecurity assessment reporting template.

Overview of OEB's Independent Cyber Security Assessment Program

One of the objectives of the independent cyber security assessment program is to increase the OEB's understanding of utilities' cyber security maturity. The information generated through these assessments will also help utilities to optimize their cyber security action plans, which will contribute to broader sector resilience. The program has four main components:

- Each utility must retain a third-party independent assessor (Independent Assessor) that meets the minimum experience requirements established under section 5 of the Standard
- The Independent Assessor will assess the maturity level of each OCSF control objective (also known as a subcategory) and make recommendations regarding the maturity level of the utility's cyber security practices

- The utility will report the assessed maturity levels and the Independent Assessor's observations to the OEB on or before a reporting deadline established by the OEB, using the standardized reporting template
- OEB staff will review the results and where appropriate, may require the utility to submit an action plan that targets increased maturity level(s) for the OCSF control objectives in line with the recommendations made by the Independent Assessor

Reporting Schedule for Utilities and Reporting Timelines

Appendix A of this letter includes the reporting schedule for submission of the first cycle of independent assessment reports. Utilities have been assigned to one of three groups with the first group due to submit reports on or before January 30, 2026. Reports from the second and third groups will be due July 31, 2026, and January 29, 2027, respectively.

How to Complete the Reporting Template

The independent cybersecurity assessment reporting template that will be submitted to the OEB has been [posted](#) on the OEB's website. As stated in sub-section 5.1(b) of the Standard, an independent assessment shall be based on the version of the OCSF that is in effect twelve months before the utility's reporting deadline. Accordingly, the group of utilities that are scheduled to submit independent assessment reports by January 30, 2026 will be reporting on [OCSF version 1.1](#), which is the current version.

The reporting template is in the form of an Excel file with two spreadsheets. The Independent Assessor and utility representative will sign off on the cover sheet. The Independent Assessor will complete the reporting template that consists of the following columns:

1. OCSF sub-category¹
2. Current state observation
3. Current state maturity level indicator (MIL)
4. Applicability of current state MIL
5. Recommended actions (if applicable)

Utility Risk Profile

In the OCSF, the Cyber Security Advisory Committee has included guidance on the applicability of each control objective for low, medium and high-risk utilities. For example, OCSF version 1.1 (the current version) contains a total of 120 control

objectives, all of which are applicable to high risk utilities, while 90 are applicable to medium risk utilities and 61 are applicable to low risk utilities. A utility is required to use the [Ontario Cyber Security Risk Profile tool](#) to determine its risk classification.

Prior to conducting an assessment, the Independent Assessor should review the utility's responses to the Ontario Cyber Security Risk Profile tool. If the Independent Assessor determines that the utility is low or medium risk, they should input 'Not Applicable' in the 'Applicability of current state MIL' Column corresponding to control objectives that, based on the OCSF, are not applicable for a low or medium risk utility, respectively. The Independent Assessor must still input a current state MIL for control objectives that are not applicable; however, the OEB understands that current state MIL may be '0'.

Instructions for how to securely submit the completed and signed reporting template to the OEB will be communicated at a later date.

The OEB's Review of Independent Assessment Reports

Upon receipt of the independent assessment reports, the OEB will review each utility's assessment results considering the applicability of each OCSF control objective and the utility's history of RRR reporting, among other considerations. Depending on the outcome of this review, the OEB may require the utility to submit an action plan demonstrating how they will address the recommendations made by the Independent Assessor.

Any questions relating to this letter should be directed to IndustryRelations@oeb.ca. Please include "Cyber Security Independent Assessment" in the subject.

Yours truly,

Brian Hewson
Vice President, Consumer Protection & Industry Compliance

Appendix A – Utility Reporting Schedule

Group 1 Submission Deadline: January 30, 2026	Group 2 Submission Deadline: July 31, 2026	Group 3 Submission Deadline: January 29, 2027
Atikokan Hydro Inc.	Alectra Utilities Corporation	Attawapiskat Power Corporation
B2M Limited Partnership	Algoma Power Inc.	E.L.K. Energy Inc.
Bluewater Power Distribution Corporation	Canadian Niagara Power Inc.	Elexicon Energy Inc.
Burlington Hydro Inc.	Chatham x Lakeshore GP Inc.	ENWIN Utilities Ltd.
Centre Wellington Hydro Ltd.	Cornwall Street Railway Light and Power Company Limited	Essex Powerlines Corporation
Cooperative Hydro Embrun Inc.	Entegrus Powerlines Inc.	GrandBridge Energy Inc.
Enova Power Corp.	ERTH Power Corporation	Greater Sudbury Hydro Inc.
EPCOR Electricity Distribution Ontario Inc.	Fort Albany Power Corporation	Grimsby Power Incorporated
Festival Hydro Inc.	Halton Hills Hydro Inc.	Milton Hydro Distribution Inc.
Five Nations Energy Inc.	Hydro One Networks Inc.	Niagara Peninsula Energy Inc.
Fort Frances Power Corporation	Hydro One Remote Communities Inc.	Niagara Reinforcement Limited Partnership
Hearst Power Distribution Company Limited	Hydro One Sault Ste. Marie Inc. on Behalf of Hydro One Sault Ste. Marie LP	Niagara-on-the-Lake Hydro Inc.
Hydro 2000 Inc.	Hydro Ottawa Limited	Oakville Hydro Electricity Distribution Inc.

<p align="center">Group 1</p> <p align="center">Submission Deadline: January 30, 2026</p>	<p align="center">Group 2</p> <p align="center">Submission Deadline: July 31, 2026</p>	<p align="center">Group 3</p> <p align="center">Submission Deadline: January 29, 2027</p>
Hydro Hawkesbury Inc.	InnPower Corporation	Ottawa River Power Corporation
Kingston Hydro Corporation	Kashechewan Power Corporation	Renfrew Hydro Inc.
Lakeland Power Distribution Ltd.	Lakefront Utilities Inc.	Sioux Lookout Hydro Inc.
London Hydro Inc.	Newmarket-Tay Power Distribution Ltd.	Tillsonburg Hydro Inc.
North Bay Hydro Distribution Limited	Oshawa PUC Networks Inc.	Toronto Hydro-Electric System Limited
Northern Ontario Wires Inc.	PUC Distribution Inc.	Upper Canada Transmission 2, Inc.
Orangeville Hydro Limited	Rideau St. Lawrence Distribution Inc.	Wasaga Distribution Inc.
Wellington North Power Inc.	Synergy North Corporation	Wataynikaneyap Power GP Inc.
Westario Power Inc.	Welland Hydro-Electric System Corp.	