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Omaha Public Power District

SD-12: Security and Information Management Governance Committee Report November 19, 2024

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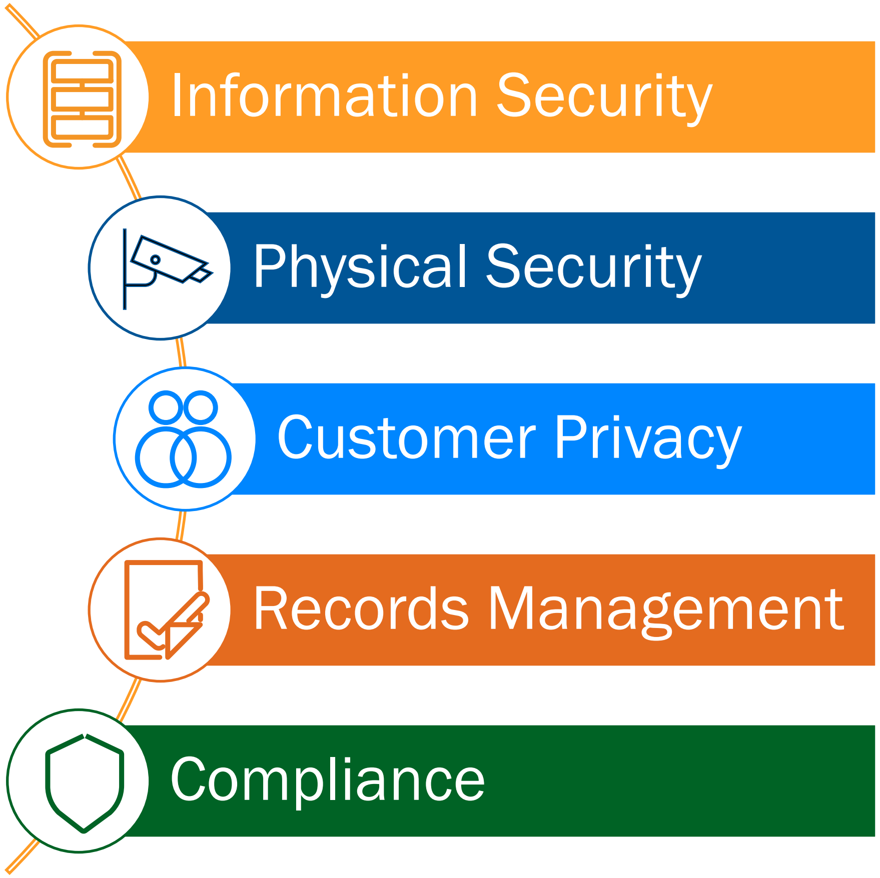
SD-12: Security and Information Management

Robust security and information management practices are critical to effective risk management and to ensure regulatory compliance, business resiliency and customer-owner satisfaction, and the safeguarding of people and facilities.



- Information Security
- Physical Security
- Customer Privacy
- Records Management
- Compliance

Ensuring Compliance to SD-12

New Initiatives and Controls

Ongoing Controls

Information Security

Objective

- Processes and methodologies protect print, electronic, or any other form of information or data from unauthorized access, misuse, disclosure, destruction or modification.

Ongoing Controls

- Advancing our capabilities to identify and respond to cybersecurity events
- Identifying and mitigating new and aging known vulnerabilities based on risk to the organization
- Conducting regular cybersecurity incident response exercises to test and improve our processes and updating the incident response plan
- Leveraging partnerships to collect and analyze cybersecurity information, including threats and vulnerabilities, to reduce risks and to increase operational resilience
- Maturing our security awareness services with a focus on enhanced training and email phishing prevention
- Increasing security awareness to all employees through ongoing communications
- Leading and participating in security organizational roles and exercises

Physical Security

Objective

- A safe and secure environment for all OPPD personnel, contractors, visitors, operations and properties.
- Security processes support emergency management, vulnerability and behavioral threat management programs, and utilize applicable national, industrial and communications security best practices.

Ongoing Controls

- Implementing Critical Infrastructure Protection 014 (CIP-014) compliance and Enterprise Security Improvement Program (ESIP) projects, including auditing of processes and standards
- Collaborating with Nebraska Information & Analysis Center and law enforcement agencies
- Documenting remediation and compensatory measures for deviations of security practices allowing for operational flexibility
- Performing threat and vulnerability assessments of assets
- Conducting security awareness education and training campaign for employees, contractors and visitors
- Collaborating with Utility Operations, Customer Service and Emergency Management

Customer Privacy

Objective

- Customer privacy and protection of customer-owner information, preventing any dissemination of customer-owner information to a third party for non-OPPD business purposes without customer-owner consent or except as provided by law or for a business purpose.

Ongoing Controls

- Ensuring customer privacy through OPPD’s Identity Theft Prevention Program
  - Reviewing this program annually for effectiveness and compliance with state and federal regulations
  - Reviewing an annual report of this program by OPPD management to ensure its effectiveness
  - Training all employees with access to customer information on this program, including annual training and regular assessments in relation to data sharing and security
- Providing customer communications regarding fraud-related trends and events in partnership with Customer Service and Public Affairs

Records Management

Objective

- Efficient and systematic control of OPPD records inclusive of, identification, classification, storage, security, retrieval, tracking and destruction or permanent preservation of records.

Ongoing Controls

- Strengthening records management collaboration across OPPD to become an enterprise function
- Ensuring records management staff are trained on practices and have procedures for maintaining, archiving and destruction of required business records
- Leveraging industry and external partnerships, including outside utilities and government entities
- Improving processes and services in consideration of efficiency, effectiveness and security
- Supporting records management efforts associated with Fort Calhoun Station nuclear decommissioning and other Utility Operations activities

Compliance

Objective

- Technology compliance with contractual and legal requirements through the use of technical controls, system audits and legal review.

Ongoing Controls

- Strengthening governance, risk and compliance capabilities through formal enterprise management, identification and attestations of control compliance
- Engaging employees, legal counsel and external entities to stay abreast of the changing landscape from a legal/compliance perspective
- Confirming that security and privacy measures are included in contracting processes for the protection of OPPD data and systems, and are supported by our engaged third parties
- Performing annual external audits and internal reviews, with findings provided to management

2024 Accomplishments

Information Security

- ✓ Rewrote and published OPPD Cybersecurity Incident Response Plan
- ✓ Deployed new email and file system security technological tools
- ✓ Processed and reviewed security incidents & threat intelligence reports

Physical Security

- ✓ Completed majority of CIP 014 required assets
- ✓ Continued security enhancement and upgrades
- ✓ Resolved audit remediations
- ✓ Performed physical security vulnerability assessments
- ✓ Expanded security camera views

Customer Privacy

- ✓ Completed Data Governance Charter and formed Steering Committee
- ✓ Created Data Governance roadmap, policy, framework and operating model
- ✓ Implemented access controls to data

2024 Accomplishments

Records Management

- ✓ Implemented process improvement to clear multi-year record archival backlog
- ✓ Transmitted 364 records of more than 190,000 pages required for nuclear compliance
- ✓ Digitized Master Facility Plan

Compliance

- ✓ Participated in an industry peer review
- ✓ Validated federal compliance with HIPAA
- ✓ Researched requirements for compliance with two new Nebraska laws

Recommendation

The Governance Committee has reviewed and accepted this Monitoring Report for SD-12: Security and Information Management and recommends that the Board finds OPPD to be sufficiently in compliance with Board Policy SD-12: Security and Information Management.

Any reflections on

what has been accomplished, challenges and/or strategic implications?