



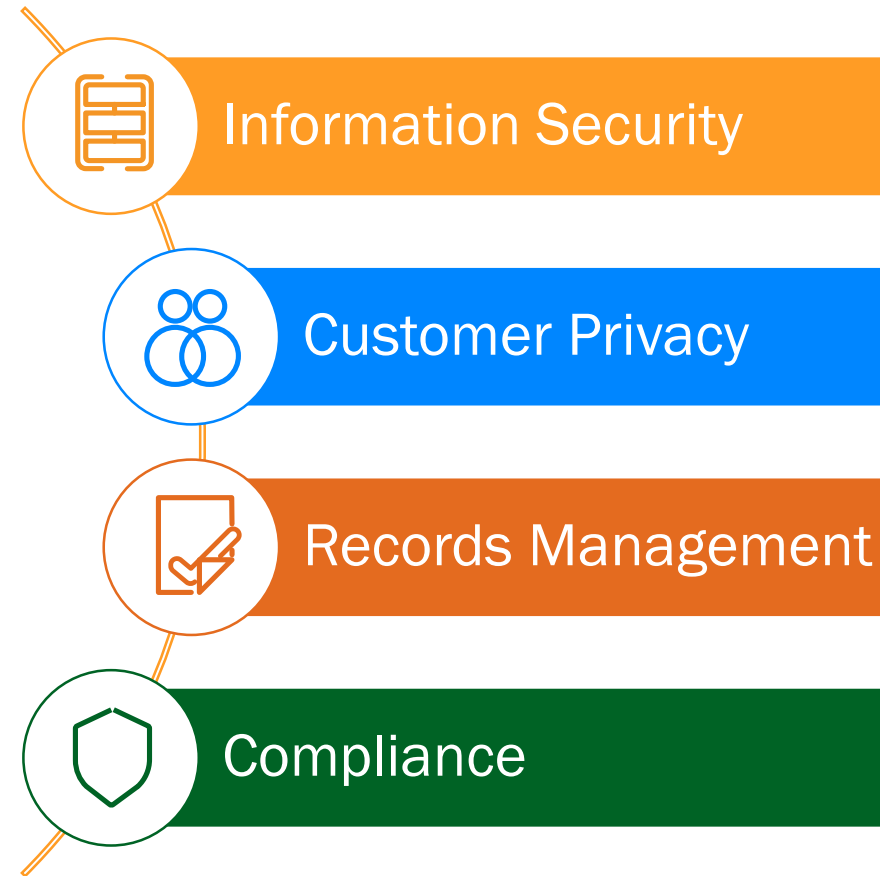
SD-12: Information Management and Security Monitoring Report

Governance Committee Report
October 2021



SD-12: Information Management & Security

- Robust information management and security practices are critical to effective risk management and to ensure regulatory compliance, business resiliency and customer-owner satisfaction
- OPPD shall safeguard and protect data, information and assets from inappropriate use, improper disclosure and unauthorized release



Ensuring Compliance to SD-12



Information Security



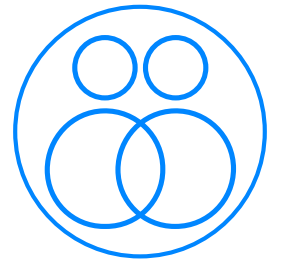
Objective

- OPPD will implement processes and methodologies to protect print, electronic, or any other form of information or data from unauthorized access, misuse, disclosure, destruction, or modification

Ongoing Controls

- Maturing our capabilities to identify and respond to cybersecurity events
- Identifying and mitigating known vulnerabilities based on risk to the organization
- Conducting regular cybersecurity incident response exercises to test and improve our processes
- Establishing and maturing plans, procedures, and technologies to detect, analyze, and respond to cybersecurity events
- Leveraging partnerships to collect and provide cybersecurity information, including threats and vulnerabilities, to reduce risks and to increase operational resilience
- Maturing our security awareness services with a focus on phishing prevention
- Creating security awareness to all employees through training and communications

Customer Privacy



Objective

- Except as provided by law or for a business purpose, OPPD will not disseminate customer-owner information to a third party for non-OPPD business purposes without customer-owner consent
- Where sensitive and confidential information is disseminated for a business purpose, OPPD will ensure that the third party has information practices to protect the sensitive and confidential customer-owner information
- OPPD will maintain a process that identifies the business purposes for which OPPD will collect, use and disseminate sensitive and confidential customer-owner information

Ongoing Controls

- OPPD's Identity Theft Prevention Program is the cornerstone for ensuring customer privacy throughout OPPD
 - This program is reviewed regularly for effectiveness and compliance with state and federal regulations
 - An annual report of this program is reviewed by OPPD management to ensure its effectiveness
 - All employees with access to customer information are trained based on this program, including annual training and regular assessments in relation to data sharing and security
- Customer Service and Public Affairs teams partner to provide customer communications based on fraud-related trends and events

Records Management

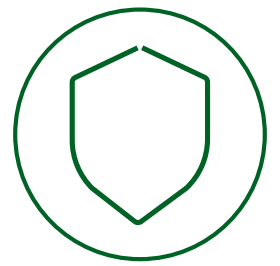


Objective

- The efficient and systematic control of the creation, capture, identification, receipt, maintenance, use, disposition, and destruction of OPPD records, in accordance with legal requirements

Ongoing Controls

- 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
- Continuing process and service improvements in light of efficiency, effectiveness and security
- Strengthening collaboration across OPPD in the area of records management
- Supporting records management efforts associated with FCS nuclear decommissioning and other EPND activities



Compliance – Ongoing Controls

Objective

- Comply 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 also supported by our engaged third parties
- Performing internal and external audits and reviews on a regular basis, with findings provided to management

Progress in 2021

Information Security

- Strengthened security through specialized training and awareness activities
- Increased focus on vendor risk management
- Strengthened the governance and management of Information Security, enhancing integration of security capabilities in technology solutions
- Increased threat awareness through industry and data sharing partnerships

Records Management

- Continued development of records management function
- Completed retention schedule review, seeking State of Nebraska Records Management Office approval
- Leveraged industry and external partnerships
- Supported records management efforts associated with FCS nuclear decommissioning and EPND activities

Customer Privacy

- Enhanced scam prevention tactics and continued proactive requests to shut down toll free numbers known to be used to defraud OPPD customers
- Brought greater visibility to area scam activities through utility partnerships
- Requested shut down of suspicious non-toll free numbers
- Introduced new methods of customer education: NextDoor & email

Compliance

- Strengthened security policy (and associated controls), further aligning to established best practices, industry standards, and regulatory recommendations and requirements
- Increased focus on digital transformation, cloud technology growth and OT/IT convergence
- Completed internal and external maturity assessments of critical capabilities, threat and vulnerability management

Recommendation

- The Governance Committee has reviewed and accepted this Monitoring Report for SD-12 and finds that OPPD is taking reasonable and appropriate measures to comply with Board Policy SD-12

Questions

