Meeting Notes
Project 2023-09 Risk Management for Third-Party Cloud Services
Drafting Team

August 7, 2025 | 3:00 – 5:00 p.m. Eastern

WebEx

Review NERC Antitrust Compliance Guidelines and Public Announcement
Jason Snider, NERC staff, called attention to the NERC Antitrust Compliance Guidelines and the public meeting notice.

Roll Call and Determination of Quorum
A team roll call was taken and quorum was determined. The member attendance sheet is attached as Attachment 1.

Opening Remarks
M. Hyatt, chair, welcomed everyone to the meeting, explaining that as the group had completed its first review of the drafted requirements, the focus would now shift to discussion on higher level concepts the group would need to address before further revising language.

Parking Lot Discussions - CIP-013 - Cyber Security - Supply Chain Risk Management
As the group had completed an initial review of CIP-004 on the previous call, M. Hyatt suggested that CIP-013 be the next focus point, suggesting that many of the same issues could appear in that standard. First the group reviewed the previous draft definition for Cip Cloud Service (CCS):

> **CIP Cloud Service (CCS):**
> A Cloud Service that, if rendered unavailable, degraded, or misused would, within 15 minutes of its required operation, mis-operation, or non-operation, adversely impact one or more Facilities, systems, equipment or service, which, if destroyed, degraded, or otherwise rendered unavailable when needed, would affect the Reliable Operation of the Bulk Electric System. Redundancy of affected Facilities, systems, equipment, and services shall not be considered when determining adverse impact

The group spent some time discussing what, if any, aspects of CIP-013 would apply to a CCS. Some of the topics included:

- Registered Entity would not be installing equipment or software, but rather using a service.

- Which entity would manage the procurement risks, and how to ensure they are managed similarly.
- Would it be possible to consider CCS as a system? Doing this would reduce the number of changes needed.

The group discussed the need to create a document for how CIP-004, -013, and -016 would flow to use in outreach. After making some revisions to CIP-013, the group conducted a quick review of the parking lot items remaining:

1. **Parking Lot:**
   - Discussion – Can a BES Cyber System include a BES Cyber Service?
   - Discussion – Applicability for BES Cyber Service - CIP-013 / CIP-008
   - Discussion – Impact ratings (EACMS/PACS without rating) / CIP-002 Discussion / Impact Scoping
   - Discussion – Definitions review (CCS)
   - Non-disclosure agreements in CIP-016?
   - Discussion – Cloud network providers
   - Discussion – Existing providers
   - Overlapping requirements
   - Overreaching requirements
   - Cloud-specific requirements
   - Development of use cases / Assessment vs frameworks
   - Review of draft by cloud providers
   - Implementation Guidance – plan
   - Tag Requirements as underlay or overlay

It was suggested that the group consider CIP-008 during the next teleconference.

Action Items

1. Drafting team to consider use-case scenarios to bring to future meetings.
2. Everyone is encouraged to register if they plan on attending in-person meetings August 26 – 28.
3. Everyone is encouraged to submit agenda items for in-person meetings.
4. Drafting team to review working draft.

Attachment 1

Name	Entity	8/7/25
Matt Hyatt	Georgia System Operations Corporation	Y
Jay Cribb	Southern Company Services	Y
Christopher Anderley	Great River Energy	Y
Jeff Sykes	Utility Services of Vermont	N
Jeremy Lyon	Evergy	Y
John Dirks	Salt River Project	Y
Joseph Mosher	EDF Renewables	Y
Lew Folkerth	RF	N
Lindsey Hale	Amazon Web Services	Y
David Dunn	ddEnerCIP	Y
Stephane Pellerin	Hydro-Quebec	Y
Thad Ness	Florida Power & Light (NextEra Energy)	Y
William Vesely	New York Power Authority	Y