

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

July 17, 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.

### **Meeting Updates**

M. Hyatt provided an update on the in-person meeting, offering the drafting team the dates of August 26 - 28 at GSOC offices. DT members on the call agreed these dates would work. More information would be provided to the group soon. M. Hyatt explained that the group would work on developing an agenda for the in-person meetings, with the goal of having a second review of the draft ready for outreach.

### **Parking Lot Discussions**

The group began a review of the parking lot items identified, beginning with a review of the applicability of BES Cyber Services in existing CIP Standards, with the main consideration being whether requirements around cloud services would require changes to those existing standards, or if changes could be housed in the new draft standard.

### **CIP-013 - BES Cyber Service Applicability**

The drafting team began with a review of CIP-013. Concerns were raised regarding duplication of requirements if similar language were drafted in CIP-016. FERC staff, speaking for themselves, suggested that focusing revisions to a new standard may be more palatable to industry. It was noted that the definition of a VCA may need to be revised to exempt services to accommodate virtual machines, and the

group discussed having all CIP standards except CIP-016 apply to virtual machines. One suggestion was to have CIP-013 focus on the overlay, while CIP-016 focused on the underlay. D. Dunn noted that the methods of demonstrating compliance would be different for cloud services, and thus requirements were probably best left to their own standard. The group eventually agreed to keep language regarding Supply Chain Risk Management (CIP-013) located in the new standard as much as possible.

#### **CIP-008 - BES Cyber Service Applicability**

The drafting team next reviewed CIP-008. Some of the topics discussed included:

- How to address the two focus points of the standard – testing and reporting
- How to potentially incorporate an incident response program within CIP-016
- What will notification from the cloud service provider entail?
- How to ensure traceability and accountability throughout the process

The group agreed to keep language regarding Incident Reporting and Response Planning (CIP-008) located in the new standard as much as possible.

#### **Action Items**

1. Drafting team to consider use-case scenarios to bring to future meetings
2. Drafting team to review [working draft](#).

## Attachment 1

| Name                 | Entity                                 | 7/17/25 |
|----------------------|--|---------|
| 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                         | N       |
| Lew Folkerth         | RF                                     | Y       |
| Lindsey Hale         | Amazon Web Services                    | N       |
| David Dunn           | ddEnerCIP                              | Y       |
| Stephane Pellerin    | Hydro-Quebec                           | Y       |
| Thad Ness            | Florida Power & Light (NextEra Energy) | Y       |
| William Vesely       | New York Power Authority               | Y       |