

# Meeting Notes

## Project 2023-09 Risk Management for Third-Party Cloud Services

### Drafting Team

April 24, 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 today's teleconference would focus on review of the rough draft frameworks that were assigned during the previous teleconference.

#### Review of Early Draft Frameworks

The group discussed the "compartmentalization" approach that the drafting team agreed on previously, and the initial frameworks that some drafting team members volunteered to draft to serve as starting points for discussion. M. Hyatt reminded the team that the approach could involve a combination of the ideas presented today.

L. Folkerth provided an overview of his [draft, which was a matrix](#) that was similar to a RSAW approach with divided accounting of responsibilities. D. Dunn presented a [draft that resembled a traditional standard approach](#) that looked to reflect intent of the existing CIP standards. L. Hale shared an [AI generated proposal](#) approach that integrated existing cloud-service provider approaches in a high level format. M. Hyatt also shared an [AI drafted approach](#) using slightly different prompts. The group noted that the AI generated approaches hinged on many assumptions, including drafting many new glossary terms.

L. Hale suggested the drafting team participate in a virtual tour of a cloud service provider's facility to effectively see and contextualize the physical security aspects of a large cloud service provider.

W. Vesely volunteered to draft a more results-oriented example that focused more on frameworks as opposed to specific control requirements, which could allow a vendor or CSP to better fulfill the intent of requirements as opposed to specifying the types of controls needed.

The drafting team spent some time discussing Impact Rating and the impact of a function or type of service on the level of scrutiny, which could provide opportunities to improve the level of obligation in domains such as evaluation, communication, risk management, monitoring activities as opposed to device or system based focused requirements.

#### **Action Item**

1. W. Vesely to develop framework based on intent of requirements.

## Attachment 1

Name	Entity	4/24/25
Christopher Anderley	Great River Energy	N
Jay Cribb	Southern Company Services	N
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	Y
Lindsey Hale	Amazon Web Services	Y
Matt Hyatt	Georgia System Operations Corporation	Y
David Dunn	ddEnerCIP	Y
Stephane Pellerin	Hydro-Quebec	N
Thad Ness	Florida Power & Light (NextEra Energy)	Y
William Vesely	New York Power Authority	Y