

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

March 6, 2025 | 3:00 – 5:00 p.m. Eastern

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 the group would continue its review of the existing CIP standards, flagging areas that will need consideration as the group develops language.

Information Review

The group continued the discussion on CIP-010, presented by J. Dirks, resuming at Attachment 1, which focused on Transient Cyber Assets and Removable Media.

The group agreed Removable Media requirements need revision for cloud contexts, as entities lack visibility into CSP underlay access, but it was noted that CSP environments have inherent controls preventing unauthorized device connections.

J. Lyon led the group through a review of CIP-007. A common theme throughout the standard was the consideration that an entity would not have the ability to monitor, access, or enforce requirements on the cloud service provider for items like patching timelines, underlay system controls, employee access, and password management practices.

With the remaining time, J. Sykes led the drafting team through a review of CIP-015. The group discussed whether the standard would apply to BES cloud implementations, and the possibility of entities maintaining localized copies as a compliance solution.

Action Items

1. L. Folkerth and S. Pellerin to review CIP-011; expected to present at the 3/11/25 teleconference.
2. D. Dunn and L. Hale to review CIP-013; expected to present at the 3/11/25 teleconference.

3. Drafting team to review CIP-014 as a group at the 3/13/25 teleconference.
4. Group to consider options for a mapping exercise (FEDRAMP, ISO, FISMA, and SoC) for easier verification and compliance. Mapping exercise to take place after review of standards is completed.

Attachment 1

Name	Entity	3/6/25
Christopher Anderley	Great River Energy	Y
Jay Cribb	Southern Company Services	Y
Jeff Sykes	Utility Services of Vermont	Y
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	Y
Thad Ness	Florida Power & Light (NextEra Energy)	Y
William Vesely	New York Power Authority	Y