

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

March 11, 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 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 review of CIP standards, beginning with CIP-011, which was prepared by L. Folkerth and S. Pellerin. For R1, the group determined that BCSI had been addressed in the latest standard update, though it was noted that the group may need to consider the effectiveness of cryptographic methods used. In R2, it was decided that additional changes might be necessary to the language to determine applicability. W. Vesely noted that there was a lot of confusion regarding the end-of-life cycle as dealing with the erasure of BCSI has its own issues.

The group reviewed CIP-013, which was prepared by D. Dunn and L. Hale. D. Dunn stated that standard verbiage may require some changes, but the standard is written from a high-level and would not require a third party to create and utilize a risk assessment. The group discussed a key point – was Cloud Service considered a BCS? There was agreement that the issue would need to be addressed, likely through contractual language.

The group conducted a review of CIP-014 as a team. The drafting team discussed the need to revise the standard to clarify language around “control center” and “data center.” It was noted that the standard used lowercase lettering, so that the intent was not to use it as a defined glossary term. Also discussed was ensuring the audit process reflected any new standard verbiage for Cloud usage.

Action Item

Group to consider options for a mapping exercise (FEDRAMP, ISO, FISMA, and SoC) for easier verification and compliance.

Attachment 1

Name	Entity	3/11/25
Christopher Anderley	Great River Energy	N
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	N
Thad Ness	Florida Power & Light (NextEra Energy)	Y
William Vesely	New York Power Authority	Y