Unofficial Comment Form

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

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the Project 2023-09 Risk Management for Third-party Cloud Services Standard Authorization Request (SAR). The electronic comment form must be submitted by **8 p.m. Eastern, Monday, Thursday, April 21, 2024m. Eastern, Thursday, August 20, 2015**

Additional information about this project is available on the [Project 2023-09 Risk Management for Third-party Cloud Services](https://www.nerc.com/pa/Stand/Pages/Project-2023-09-Risk-Management-for-Third-Party-Cloud-Services.aspx) project page. If you have questions, contact Standards Developer, Jason Snider (via email), or at 609-751-7861.

## Background Information

From a security perspective, the electric industry landscape is facing an increase in the number and sophistication of cyberattacks and security teams are seeking tools and capabilities to improve their security programs. Security solutions with greater visibility, detection, correlation, analytics, and responsiveness are available using cloud services to help security teams to reduce potential impacts of security events and speed recovery, while also protecting data confidentiality and integrity. Cloud services can provide increased availability, including resiliency, due to the scalability, redundancy, high availability, and fault tolerance. Cloud services play a critical role in providing greater capability across the security domains. Additionally, as noted in the 2020 FERC Notice of Inquiry, the vast majority of new products from vendors are cloud-based solutions placing increased pressure on NERC registered entities to securely operate the BES. Concurrently, from an operational and reliability perspective, the modern power grid landscape is changing, driven by rapid grid modernization, digital transformation, decentralization of electric resources, and decarbonization targets. These factors are increasing the data volumes required to continue operating a reliable and resilient grid and thus increasing the need for data analytics and resources such as computing, network, and storage. Entity operations for assets across the NERC CIP impact levels will be facing the growing demands for compute capacity to manage the increasing volumes of data to respond to grid variability and maintain reliable grid operations. Increasing data storage requirements and processing requirements of grid modernization are driving the need for cloud services. Cloud resources provide Entities with expanded simulation capabilities and development environments that can help meet patching cycles and testing requirements for on premises assets under the CIP requirements. Cloud services offer fault-tolerant system design capabilities in which operations and data can be replicated and run in independent application stacks in geographically dispersed locations along with other benefits, including reliability, resilience, and security.

## Questions

1. Do you agree with the scope and objectives of this SAR? If not, please explain why you do not agree, and, if possible, provide specific language revisions that would make it acceptable to you.

[ ]  Yes

[ ]  No

Comments:

1. Do you believe that other CIP standards will need to be modified for consistency to meet the goals laid out in the SAR? If so, please provide the standard recommendation and explanation.

Comments:

1. Provide any additional comments for the drafting team to consider, if desired.

Comments: