

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

June 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 during the teleconference the group would begin reviewing the language the drafting team members had drafted for the nine high-level requirements.

Review of Draft Language

The drafting team resumed review of the proposed language for requirements, resuming on R3 (Data Protection), drafted by W. Vesely. He explained that he drafted an outline outside of the standard to review with the group that could be incorporated into the main document at a later time. Topics discussed included:

- Distinguishing operating vs. non-operating data protection
- Aligning with SAR requirements
- Comparison to current CIP-011 BCSI treatment
- Addressing cloud-specific data protection considerations
- Discussing indirect services reliance, emphasizing:
 - Interoperability
 - Portability
 - Usability
 - Reliability risk and resilience

- Disposal procedures
- Unauthorized retrieval prevention

The drafting team moved next to R9 (Security Testing and Validation), drafted by C. Anderley. Topics discussed included:

- A need for the team to review the draft for overlapping or duplicative requirements
- Ensuring the assessment period provides adequate risk protection while not being onerous
- Challenges with CSP vendor tabletop exercises
- Scalability issues with CSP-utility tabletop exercises

Action Items

1. Drafting team members to draft Requirements based on [Domain assignments](#).
2. Drafting team to review [working draft](#).

Attachment 1

Name	Entity	6/24/25
Matt Hyatt	Georgia System Operations Corporation	Y
Jay Cribb	Southern Company Services	N
Christopher Anderley	Great River Energy	Y
Jeff Sykes	Utility Services of Vermont	Y
Jeremy Lyon	Evergy	N
John Dirks	Salt River Project	Y
Joseph Mosher	EDF Renewables	Y
Lew Folkerth	RF	Y
Lindsey Hale	Amazon Web Services	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