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

April 29, 2025 l 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 review the framework-based draft and then focus on determining how to start drafting language for the new standard.

Review of Early Draft Frameworks
M. Hyatt presented a recap of their recent work which involved developing CIP-016, a proposed new standard aiming to address cloud-specific requirements without altering the existing CIP standards. The approach taken so far has seen varied strategies from high-level overviews to detailed control requirements.

W. Vesely proposed an option using NIST SP 800-53 control families and cybersecurity frameworks to benchmark and simplify the process, avoiding exhaustive detailing and instead leveraging existing frameworks like NIST to guide new standards while making it easier for varied stakeholders to comply.

The drafting team acknowledged the difficulties in mapping specific, detailed controls from existing CIP standards to a new cloud-specific standard. The need for more generalized, objective-based requirements was highlighted, facilitating better understanding and easier compliance for different types of vendors and service providers. It was noted that identifying and mitigating new risks unique to cloud services (such as those identified in the revised SAR) would be as important as ensuring that existing requirements were mapped to the new standard. This led to discussion on the use of outcomes to frame requirements. This would involve entities demonstrating they have achieved the desired outcomes rather than following

prescriptive, detailed steps. This would facilitate making the new standard more adaptable and scalable, especially in a cloud services context.

The group discussed next steps, which included developing a template for the high-level requirement mapping and review of the ERO Enterprise CMEP Practice Guide - Using the Work of Others.

Action Item

1. D. Dunn to create a structural template for CIP-016 using outcome-based requirements. The template will be shared on the SharePoint for the team to review and expand upon.

Attachment 1

Name	Entity	4/29/25
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