

Meeting Notes

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

February 6, 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 for today's call the group would continue a review of the information gathered by Drafting Team members to help inform us of the next steps in drafting language, this time focusing largely on the Glossary of Terms.

Information Review

J. Cribb presented an overview of relevant definitions. The team reviewed each, noting which ones would need consideration related to cloud usage. Some of the terms discussed included:

- BES Cyber Asset: Might be less of an issue depending on the definition of Virtual Cyber Asset.
- Cyber Asset: This is foundational to most other definitions. "Electronic device" is an issue.
- BES Cyber System: Works with VCA, but SCI might need to be modified. Doesn't work well for SaaS or PaaS. Look at using services vs devices.
- Cyber System: Move from Cyber Asset concept and incorporate the concept of services.
- Virtual Cyber Asset: Works with IaaS, but not others. Could be said for most definitions.
- SCI: May not work with SaaS. However, it does matter for the underlay.
- BCSI: Vendor's underlay needs to be considered.
- CIP Senior Manager: Consider things like CIP-007 patch management authorizer. Won't be authorizing vendor's patching.

- Control Center: Associated data center could be an issue as vendor's data center could end up being a control center.
- Cyber Security Incident: PSP part of the definition that doesn't work with Cloud Vendor.
- Cyber System: Move to incorporate the concept of services.
- EACMS: Consider other standards that tie EACM to hardware, such as CIP-007 R2 patching.
- EAP: Possibly change Cyber asset interface to just an interface? Consider Cloud access Security Broker (CASB)
- IRA: Barrier No.
- Intermediate System: Do we need an intermediate system to get to a SaaS provider, i.e., URL? Some felt that it is still needed.
- PSP: Works as a definition, but if the BCS is cloud hosted solution does it still apply?
- PCA: Thinking about local network peer as it relates to the various cloud scenarios.

Some of the overarching questions raised were:

- Is a BCS a BCS whether it is on-prem vs off-prem?
- How to address vendor services vs a Cyber Asset.
- Subservices: Risk Assessment responsibility? What is the entity going to be held accountable for?
- Consider utility perspective when updating the standards. If identifying cloud providers as part of CIP-002, how would a utility mitigate those risks? Must consider what an entity can actually do.
- Could other industry standards such as PCI-DSS be used for inspiration?
- If the definition doesn't get updated, the concept/issue may still need to be addressed. The function needs to be "tagged" with something, i.e., BROS 15-minute impacting widget.

Action Items

1. L. Hale to present a review of CIP-005 R1, utilizing the spreadsheet on the group's extranet site.
2. J. Lyon to present a review of CIP-005 R2 and R3, utilizing the spreadsheet on the group's extranet site.
3. J. Sykes to present a review of CIP-006, utilizing the spreadsheet on the group's extranet site.

Attachment 1

Name	Entity	2/06/25
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	N
Thad Ness	Florida Power & Light (NextEra Energy)	Y
William Vesely	Consolidated Edison Company of New York, Inc.	Y