

**RELIABILITY FIRST**

August 1, 2024

To: ReliabilityFirst Compliance Contacts
Subject: RF Compliance Program Update Letter – August 2024

IMPORTANT! Secure Evidence Locker File Size Limits are Increased

The [Secure Evidence Locker \(SEL\) Cheat Sheet](#) has been updated to include: **increase in file-size limitation to 100MG and multiple file uploads to 10GB in size**; notice that files embedded with macros are not allowed to be uploaded; limitation on browsers (Edge and Chrome are supported; Firefox is not); and updates on email submissions so that submitter will receive an email upon successful upload or failure.

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NEW! IBR Registration Initiative Q2 2024 Update Posted

Consistent with its [Inverter-Based Resource Strategy](#), NERC is dedicated to identifying and addressing challenges associated with inverter-based resources (IBR) as their penetration continues to increase. In addition, FERC issued two orders with directives to NERC regarding IBRs: (1) an [order](#) directing NERC to identify and register owners and operators of currently unregistered bulk power system-connected IBRs; and (2) [Order No. 901](#) directing the development of Reliability Standards addressing multiple aspects of IBR planning. Working closely with industry and stakeholders, NERC is executing a FERC-approved [IBR Registration work plan](#) and an [Order No. 901 Work Plan](#) to achieve these directives within the prescribed timeframes.

NERC's [IBR Registration Initiative Q2 2024 Update](#) showcases progress made, highlights key activities in Legal, Registration, Standards, and Stakeholder Outreach and E-ISAC Engagements, and provides available resources. This update was developed as part of NERC's ongoing efforts to ensure industry and stakeholders are kept informed throughout this critical, three-phase project.



For the latest information and updates, or to find the resource documents related to the IBR Initiative, check out the [IBR Registration Initiative Quick Reference Guide](#).

Register Now! RF Fall Reliability and Security Summit, Sept. 16-18

Formerly known as the Fall Workshop, this year’s Fall Reliability and Security Summit will take place **Sept. 16-18** at the vibrant Conrad Indianapolis (50 West Washington Street, Indianapolis, IN 46204). We’ll dive into the intersection of energy policy with reliability and security, with speakers from state government, industry, academia and ReliabilityFirst. We will start with our annual Awards Ceremony on Monday night, followed by a full day of panels and presentations on Tuesday. Wednesday morning will include additional presentations, concluding with industry committee meetings. We hope to see you there! A preliminary agenda is now available on the [RF website](#). Breakfast and lunch will be available each day of the workshop.

[Click here](#) to register.

Register for E-ISAC Membership

As a registered entity, it is important, and expected, that you will join the Electricity Information Sharing and Analysis Center (E-ISAC). E-ISAC membership is available to North American asset owners and operators (AOOs) and select partner organizations, and there is no cost to join. The E-ISAC encourages security individuals with cyber, physical, or operational technology security responsibilities to apply for membership.

Please complete the E-ISAC Membership application here: <https://www.eisac.com/portal>. You may also contact the E-ISAC at memberservices@eisac.com with any questions.



Monthly Technical Talk with RF Call

The next Tech Talk with RF will be held on **Monday, Aug. 19**, from 2 to 3:30 p.m. EDT.

July 2024 Technical Talk with RF

Monday, August 19, 2024 2:00 PM | (UTC-05:00) Eastern Time (US & Canada)

Join link:

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=me4aee5170fb663587cab1d8ac20528a9>

Meeting number: 2304 257 6965

Meeting password: 0123456

Join by phone: 1-650-479-3207 Call-in toll number (US/Canada)

Access code: 230 425 76965

Please join us on Slido.com using **#TechTalkRF** as the event code.

Agenda Topics

The business case for prioritizing your mental and physical well-being

Niki Schaefer, VP & General Counsel, RF

Although the demands that work, and life outside of work, place on our lives vary from person to person, we all share the common challenge of navigating them in a way that allows us to feel successful in our careers and in our personal lives. Every day we are faced with a series of choices in how we allocate our time and energy, yet often the pressures life puts on us make us feel like we don't have a choice. That was the experience of Niki Schaefer when she suffered a stroke at 38 years old as a result of placing more importance on her career, parenting, family, friend and community obligations than she placed on her own mental and physical health. Niki will explain what happened and the lessons she learned on her road to recovery that helped her find health and happiness post-stroke.

The value of workplace friendships

Sam Queeno, Director, Physical Security, AEP, and Founder, Best Friend Friday

You may know Sam Queeno from his work as Director of Physical Security for AEP, but beyond his security expertise, Sam has another passion: the value of having a best friend at work. He started Best Friend Friday, a weekly video series that highlights best friends at work, in 2018, and

[published a book](#) on this subject as well in May 2024. This passion project has grown to become a framework that can be used both to improve relationships in the workplace and beyond. Sam will discuss the “best friend at work” concept and the value it can bring to your organization.



IMPORTANT REMINDER – UPDATE COMPLIANCE CONTACT INFORMATION in CORES

Registered entities are expected to review and update their compliance contacts information as changes occur. Updating compliance contact information is critical to ensure that our contact data remains fresh, accurate and is current always. **Please verify and update as necessary the names, addresses, phone numbers (cell) and email addresses for your Compliance Contacts (PCC/ACC/PCO) in the ERO Portal/CORES system.**

NERC Registration and Certification Information

Registration - Revised ERO Enterprise GO GOP Asset Verification Form

In November 2023, NERC redesigned and implemented a new GO GOP Asset Verification Form that is used by our registered Generator Owners and Operators to manage the generating assets within their portfolio. At that time, we asked entities to start using the new form when they next amended their registrations. The time has now come for all active GO and GOPs who have not yet made the change over to the new form to complete and submit a new revised GO GOP Asset Verification Form into CORES. If your entity is registered in multiple regions, you may now add all of the generating assets to the new form for ALL regions. This eliminates the need to maintain separate forms for each region. Please use the [ERO Enterprise GO GOP Asset Verification Form](#) template to complete this change. This is the same template that is being used by all regions across the ERO. RF asks that entities complete this change by August 30 (if not already done so).

Registration - Documentation Requirements for New GO/GOP Registrations

RF would like to remind Generator Owners (GOs) and Generator Operators (GOPs) of what types of documentation are required when registering new GO and GOP resources in the RF footprint:

- RF Registration Request Form (from public website)
- Map/geographic location/address of facility
- GO GOP Asset Verification Form (revision dated 11/30/23)
- Interconnection Agreements
- Third-Party or Operating Service Agreements
- Operational One-line Diagrams
 - Depicting the Generation Resource(s) through to the Point of Interconnection w/Transmission Owner (TO)
- Accurate Gross Nameplate Data for the individual PV inverters/turbines/BESS (in MVA)
- A summary description of the facilities including accurate facility profile information (such as gross nameplate rating capacity, in-service limitations, and inverter information)

Entities requesting registration should notify RF at least 30-60 days prior to anticipated registration effective date (Commercial Operations Date or COD) by emailing a RF Registration Form to compliance@first.org. At the same time, entities should initiate a draft request for registration in the ERO Portal/CORES application in preparation for future submittal once the COD date nears confirmation.

When creating a draft request for registration in CORES, entities must have the following information to complete their request:

- Registered Entity Name
- Address
- Upstream Holding Company/Owner/Parent
- Contact Roles (PCC/ACC/PCO)
- Entity Scopes (Registered Functions)
- Functional Mapping relationships
- Comments and Attachments:
 - Comment: Describe facility project and phase(s)
 - Attachment: Zip folder of documentation listed above

New entities are encouraged to contact RF registration to schedule a meeting to go over the registration process and review their registration request in CORES for accuracy and completeness.

If you have any additional questions concerning RF registration or would like to schedule a meeting, contact [Bob Folt](#), Principal Analyst – Registration.

Organization Certification Reviews

RF is providing this reminder to ensure entities registered as a **Balancing Authority (BA)**, **Reliability Coordinator (RC)**, and/or **Transmission Operators (TOP)** are aware of the Organization Certification Review and Readiness Evaluation processes. Readiness Evaluations may be required for entities taking on responsibilities for certified entities (e.g., Transmission Owners (TO-LCCs) in the PJM footprint).

[Appendix 5A Sec. V](#) of the NERC Rules of Procedure governs Certification Reviews. Readiness Evaluations are also governed by Appendix 5A Sec. V and states, "Each Entity that has taken responsibility for Reliability Standards and/or Requirements/sub-Requirements applicable to the certifiable functions by virtue of being a member of a JRO, CFR, or other agreement, shall be the entity NERC certifies to operate their portion of the RC, TOP, or BA Area(s)."

Please read the [Certification Reminder](#) bulletin posted to the [Certification page](#) on the RF public website for more valuable, detailed, information pertaining to the associated Organization Certification Review and Readiness Evaluation processes.

If you have any questions about Organization Certification or the processes outlined in this document, please contact [Sam Ciccone](#), Principal Reliability Consultant, for more information.

Registration - Notification of Additional Changes in Status

Section 501.1.3.5 of NERC's Rules of Procedure requires the **registered entity to notify NERC through its corresponding Regional Entity of any changes in registration, ownership, corporate structure, or similar matters that affect the entity's responsibilities with respect to the Reliability Standards**. Failure to notify NERC through its corresponding Regional Entity will not relieve the registered entity from any responsibility to comply with the Reliability Standards or be liable for any penalties or sanctions associated with failing to comply with such standards. **RF requests that registered entities provide RF Registration with 30-60 days advance notice of any such changes impacting NERC Registration**. Contact Bob Folt, Principal Analyst, RAM and NERC Registration, with any questions at bob.folt@rfirst.org.

NERC Alert System Registration

NERC's Alert System is the tool used to disseminate information that is critical to ensuring the reliability of the BPS in North America. NERC distributes alerts broadly to owners, operators, and users of the BPS utilizing the listing of the NCR. Entities registered with NERC are required to provide and maintain up-to-date compliance and cyber security contacts.

As a separate part of the NERC registration process and inclusion on the NCR, please contact NERC via email at NERC.Alert@nerc.net to register or revise your listing for the NERC Alert System. Alternately, you may call the NERC Alerts Hotline at 404.446.9797 to speak with someone. Each registered entity identified in the NCR is required to notify NERC Alert of any corrections, revisions, deletions, changes in ownership, corporate structure, or similar matters that affect the registered entity's responsibilities with respect to the Reliability Standards.



Align Registered Entity User Guide for Enforcement and Mitigation Updated

The [Registered Entity User Guide](#) for the Enforcement and Mitigation functionality has been updated and is now published on the [training site for Align](#). The revisions to the Registered Entity User Guides include, but are not limited to, correcting typos, updating screenshots to reflect updated functionality, detailing and clarifying various steps, adding the new RFI module functionality, and information on emails.

Feedback for updates to the user guides was solicited through the Align User Group and incorporates suggestions from the ERO Enterprise as well as industry volunteers. To review the updated guides, please navigate to the training site for Align for registered entity materials and scroll to the resources section at the bottom of the page. For registered entity users, locate the "Registered Entities: Enforcement and Mitigation User Guide" document.

Align Training Resources

The [NERC Align Project page](#) and FAQ document contain helpful information for registered entities. Self-service training resources provided for registered entity staff, including training videos and user guides, are available on the [NERC Training Site](#).

NERC's training site provides training and materials on a variety of topics for Align and other tools used by NERC, Regional Entity, and registered entity staff. Your Primary Compliance Contact is the designated Access Approver for Align for your company. Remember to check out NERC's Align project page or reach out to AskAlign@NERC.net for additional information.

Align Violations Reporting

As a reminder, any new violation of a Reliability Standard identified by a registered entity should be immediately self-reported to RF via the ERO Align system. Contact [Shirley Ortiz](#), Senior Paralegal, at (216) 503-0674 with any questions concerning self-reports.

Align support – ERO Help Desk Ticketing System

If users encounter any access or system problems with Align, CORES or any of the other NERC applications, first and foremost, try to resolve the issues yourself by using any one of the many self-service resources, guides and videos NERC has made available to you at training.nerc.net.

If you are unable to resolve the issue on your own, place a ticket using the NERC Helpdesk Ticket Submission System: support.nerc.net.

The ERO Help Desk Ticketing System (Footprints) is available to registered entity users 24/7 and is monitored by the regions and NERC. We will do our best to address your questions, issues, and tickets as promptly as possible during normal business hours.

2024 Upcoming Standards Subject to Future Enforcement

EOP-011-4	Emergency Operations Implementation Plan	Oct. 1, 2024
EOP-012-1	Extreme Cold Weather Preparedness and Operations (Requirements 1–2 effective 4/1/28; Requirement 4 effective 10/1/29) <i>Note: In accordance with FERC's February 2023 approval order, NERC submitted a revised implementation plan for the EOP-012 standard on Feb. 16, 2024, and it is pending FERC approval.</i>	Oct. 1, 2024

2025 Upcoming Standards Subject to Future Enforcement

IRO-010-5	Reliability Coordinator Data and information Specification and Collection Implementation Plan TOP-003-6.1 – Transmission Operator and Balancing Authority Data and Information Specification and Collection Implementation Plan	July 1, 2025
TOP-003-6.1	Transmission Operator and Balancing Authority Data and Information Specification and Collection Implementation Plan	July 1, 2025
TOP-002-5	Operations Planning	Oct. 1, 2025

Please refer to the [U.S. Effective Dates](#) page on the NERC website for additional detail.

Periodic Data Submittals Due in August 2024

8/30/2024	PRC-004	GO, TO, DP	Protection System Misoperations - Section 1600 data request for Q2-2024 (April 1 – June 31). Submit in MIDAS portal.
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Periodic Data Submittals Due in September 2024 - NONE