Jan. 2, 2025

To: ReliabilityFirst Compliance Contacts
Subject: RF Compliance Program Update Letter – January 2025

NEW! Webpage dedicated to the RF Compliance Users Group (CUG)

The ReliabilityFirst (RF) Compliance User Group (CUG) is available to registered entities in our footprint. It's a forum to share knowledge, lessons learned, and best practices related to North American Electric Reliability Corporation (NERC) compliance matters. RF provides meeting space and resources as needed, but the CUG is led by entities and the group meets privately without RF staff present.

The RF CUG meets three times per year. These typically occur in February, June, and in September at ReliabilityFirst's annual Fall Summit.

For more information, here is a link to the RF CUG webpage.

If you have any questions or if you are interested in joining the CUG, please contact one of the CUG Steering Members below:

- Kyle Down (kyle.down@pseg.com) (PSEG) – Chair
- Talia Boyne (tboyne@misoenergy.org) (MISO) – Vice Chair
- Patty Ireland (patricia.ireland@dteenergy.com) (DTE Energy) – Secretary
- Katie Zvomuya (kzvomuya@cpp.org) (CPP)
- Michelle Longo (mmlongo@pplweb.com) (PPL)
- Lauren Harris (Lauren.Harris@duke-energy.com) (Duke Energy)

NEW! The GO GOP Asset Verification Form has been revised to classify and delineate Category 1 and Category 2 generation assets

The ERO Enterprise has updated the GO GOP Asset Verification Form (version dated 11/22/24) to include generation assets as Category 1 (BES) or Category 2 (non-BES IBRs). Each classification has a separate tab within the form. In summary, the following tabs are now available within the new version of the ERO Enterprise GO GOP Asset Verification Form:

- **1) Asset Form Instructions –** Includes information on when and what entities are required to fill out within the following three tabs: 4a Category 1 GO GOP Assets, 4b Category 2 GO GOP Assets, and 5 Entity Change History.
- **2) When to Use Form –** Defines Category 1 and Category 2 Generator Operators and Generator Owners and gives specific example scenarios of when to complete and update the asset form.
- **3a) Cat 1 GO GOP Asset Example –** Provides examples of the type of assets that should be included as Category 1 (BES).
- **3b) Cat 2 GO GOP Asset Example –** Provides examples of the type of assets that should be included as Category 2 (non-BES IBRs).
- **4a) Cat 1 GO GOP Assets –** Requires action by an entity. An entity must complete this tab when adding or removing Cat 1 (BES) generation assets to their NERC registration.
- **4b) Cat 2 GO GOP Assets –** Requires action by an entity. An entity must complete this tab when adding or removing Cat 2 (non-BES IBR) generation assets to their future NERC registration.
- **5) Entity Change History –** Requires action by an entity. An entity must update this tab every time a revision is made to the following tabs: 4a Category 1 GO GOP Assets and 4b Category 2 GO GOP Assets.

The new revised GO GOP Asset Verification Form has been posted to the Organization Registration page on the NERC website under the header titled "Registration Process Documents" and can also be found on the RF public website on the Registration page under "About Registration".

Registered entities should start using this new form immediately for any new registrations or changes to a GO and GOP registration. RF also recommends that entities update their current form with asset listings as soon as possible before the Regional Entities begin to register the new IBRs in 2025.

Contact Bob Folt, Principal Analyst, with any questions.

NEW! RF Launches New Webpage dedicated to the Inverter-Based Resource Initiative

Check out our new webpage dedicated to the Inverter-Based Resource (IBR) Registration Initiative. This webpage serves as a one-stop-shop resource to everything related to the IBR initiative.

NEW Coordinated Oversight Program Forms are updated

NERC has published two new documents and approved their use in the Coordinated Oversight Program. The [ERO Enterprise Coordinated Oversight Guide](#) (2024 Revision) has been updated to accurately reflect the current processes and procedures of the program. This document is intended to be used by registered entities to understand the roles and responsibilities of Lead Regional Entities, Affected Regional Entities, and registered entities in the program.

The [New Request Form for New Coordinated Oversight Group](#) replaces a previous version of the form. The new form now includes an attestation that the requesting registered entity understands their roles and responsibilities in the Coordinated Oversight Program.

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.**

NEW! NERC Posts IBR Registration Resources for New Registrants

Over the past six years, system events have demonstrated that inverter-based resources (IBR) are having a major impact on generation, transmission, and distribution systems. These resources play a critical role in the transition to a more resilient and sustainable future energy landscape, but their unique characteristics present new challenges for grid reliability and stability. As part of its IBR Strategy, NERC is dedicated to identifying and addressing challenges associated with IBRs, sharing risk mitigation techniques with industry, and providing best practices and education. NERC released a suite of IBR resources for new registrants on Nov. 12, including an IBRs 101 guide, an open letter to new registrants and an overview video on the initiative. Read NERC's full announcement on these new resources here. The ERO Enterprise also provides quarterly updates to industry on the status of key IBR registration activities and milestones achieved. **NERC recently published the Q3 2024 Quarterly Update on Oct. 8.** At this stage, the ERO has concluded Phase 1 of the NERC IBR workplan and is now working on Phase 2 of the workplan (identification of IBR candidates for registration).

FERC approved revisions to the NERC Rules of Procedure on June 27, 2024, adding the following category of Generator Owners/Generator Operators (GO/GOP) to Appendix 5B Statement of Compliance Registry Criteria*.*

> **"Category 2" GO/GOPs are defined as entities that own, maintain, and/or operate non-BES inverter based generating resources that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV.**

Phase 2 of the workplan is now underway and is scheduled to run through May 2025. Phase 2 focuses on the identification of Category 2 GO/GOP candidates, as well as continued outreach and education to industry. NERC sent a request for information (RFI) to Transmission Owners (TOs) and Balancing Authorities (BAs) on July 9, 2024, as part of this effort. The information gathered through the RFI will be used to identify and connect with IBR registration candidates to inform them of the registration obligation, provide education on the reliability standards and requirements, and introduce NERC, the applicable Regional Entity, and the E-ISAC. Efforts to register new and existing Category 2 IBRs will take place through May 2026.

Questions related to this initiative should be directed to Bob Folt Principal Analyst, NERC Registration or compliance@rfirst.org.

IBR Registration Milestones

Phase 2: May 2024–May 2025	Phase 2: May 2024–May 2025	Phase 3: May 2025–May 2026
• Complete Rules of Procedure revisions and approvals • Commence Category 2 GO and GOP candidate outreach and education (e.g., through trade organizations)	• Complete identification of Category 2 GO and GOP candidates • Continue Category 2 GO and GOP candidate outreach and education (e.g., quarterly updates, webinars, workshops, etc.)	• Complete registration of Category 2 GO and GOP candidates thereafter subject to applicable NERC Reliability Standards • Conduct specific Category 2 GO and GOP outreach and education (e.g., quarterly updates, webinars, workshops, etc.)

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*.

NEW! Monthly Technical Talk with RF Call

The next Tech Talk with RF will be held on Monday, Jan. 13, from 2 to 3:30 p.m. EST.

ReliabilityFirst (RF) offers a regularly scheduled monthly call to provide entities and stakeholders with a forum for addressing topics and questions relevant to reliability, resilience and security.

While RF Subject Matter Experts (SMEs) will provide presentations and updates, they will not address entity-specific questions and issues. These types of questions can be handled offline by using the RF Assist Visit program. If you have any questions, please reach out to Mike Hughes, Entity Engagement Manager, 216-503-0617.

January 2025 *Technical Talk with RF*

Monday, Jan. 13, 2025, 2:00 PM | (GMT-04:00) Eastern Time (US & Canada)

Join link:

https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=m01d124980c8640308c6611502679c23a

Meeting number: 2317 282 9682

Meeting password: 0123456 (0123456 when dialing from a phone or video system)

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

Access code: 231 728 29682

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

Agenda:

NERC Distributed Energy Resources Aggregator Report overview

John Paul "JP" Skeath, Senior Engineer, Engineering & Security Integration, NERC

JP will discuss the highlights from NERC's new Distributed Energy Resources (DER) Aggregator Report.

RF Long-term Reliability Assessment projections

Tim Fryfogle, Principal Engineer - Resources, Engineering & System Performance, RF

Tim will discuss the analysis and projections in RF's latest Long-term Reliability Assessment.

NERC Registration and Certification Information

NEW! 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 region.

The following is a list of documentation that must be provided to RF before a new entity can be registered as a new Generator Owner (GO) and/or Generator Operator (GOP). This applies to both Category 1 (BES) and/or Category 2 (Non-BES Inverter Based Resources) generation in the RF

footprint. This documentation is to be uploaded into the NERC ERO Portal/CORES as part of the official registration record.

- [RF Registration Request Form](#)
- Map/geographic location/address of facility
- [GO GOP Asset Verification Form](#) (revision dated 11/25/24)
- Interconnection Service Agreements (e.g., ISA, SGIA, GIA, LGIA)
- Third-Party or Operating Service Agreements for GOP
- Official Stamped Operational One-line Diagrams
  - Depicting the Generation Resource(s) through to the Point of Interconnection (POI) with Transmission Owner (TO)
  - Diagram highlighting the POI with TO
  - TO interconnecting substation
  - Operating system (including collector systems if applicable)
- Accurate Gross Nameplate Rating (**in MVA**) Data for the individual PV solar inverters/turbines/BESS/etc. Provide photos of inverter nameplate ratings.
- A summary description of the facilities including accurate facility profile information (such as gross nameplate rating capacity, in-service limitations, inverter and tracker information, or any other information about the facility that may be unique to the facility)
- Notification and proof of Commercial Operations Date (COD). Official documented proof that the facility has achieved COD (e.g. official notification on letterhead with signatures, signed interconnection agreement or corporate announcements. Official notification must be sent to RF on the date commencing commercial operations).

Entities preparing to register in RF should notify RF at least 60 days prior to anticipated registration effective date (COD) by emailing their RF Registration Form to compliance@rfirst.org**.**

Once the entity has collected the required documentation, they should initiate a draft request for registration in the ERO Portal/CORES application and upload the required documentation in preparation for future registration once COD has been achieved.

When creating a draft request for registration in CORES, entities must have the following information available 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.

Certification - 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 the NERC Rules of Procedure governs Certification Reviews. Readiness Evaluations are also governed by Appendix 5A Sec. V and state, "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 Registration 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 liability 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.

IMPORTANT! 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.

Remember to always keep your NERC Alert Contacts current and up-to-date at all times.

E-ISAC Membership Registration

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.

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.

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 January 2025			
01/20/2025	FAC-003-5	GO, TO	FAC-003-4 - Transmission Vegetation Management: Q4, 2024 Vegetation Outage Reporting – **Align Data Submittal**

Periodic Data Submittals Due in February 2025 - NONE