September 4, 2024

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

NEW! IBR Registration Initiative Update

The ERO Enterprise provides quarterly updates to industry on the status of key IBR registration activities and milestones achieved. At this stage, the ERO has completed the first milestone (Phase 1) of the NERC IBR workplan.

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/GOP is defined as an entity that owns, maintains, and/or operates 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. **Responses to the RFI are due to the Regional Entities by September 20, 2024,** and 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.

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! RF guidance about when updates to ambient adjusted ratings (to comply with FERC Order 881) require a certification review

Nearly four years ago, the Federal Energy Regulatory Commission (FERC) issued Order 881, requiring all transmission providers to use ambient adjusted ratings (AARs) as the basis for evaluating near-term transmission service to increase the accuracy of near-term line ratings. As the *July 12, 2025, deadline* for this shift approaches, here's what to know about when updates to AARs may require a certification review.

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 100MB 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.

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! The full agenda is available on the RF website. Breakfast and lunch will be available each day of the workshop.

Click here to register.

Monthly Technical Talk with RF Call

The next Tech Talk with RF will be held on Monday, Sept. 9, from 2 to 3:30 p.m. EDT.

September 2024 Technical Talk with RF

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.

Event Information

September 2024 *Technical Talk with RF*
Monday, Sept. 9, 2024 2:00 PM | (UTC-05:00) Eastern Time (US & Canada)

Join link:
https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=mde784309a2b697f4aceca70d64f10740

Meeting number: 2310 307 3728

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: 231 030 73728

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

Agenda Topics

Event analysis update

Dwayne Fewless, Principal Analyst, Operational Analysis & Awareness, RF

Dwayne will provide an update on RF's event analysis activities, including an overview of the Event Analysis Program EAP V5.0, and highlight reporting expectations, trends, and lessons learned.

Risk Assessment Guidelines overview

Shawn Barrett, Principal Analyst, Risk Analysis & Mitigation, RF

Shawn will highlight key points in each of the six sections in RF's Risk Assessment Guidelines document, published earlier this year, and offer insight on some of the sources that are referenced.

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.

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 their RF Registration Form to compliance@rfirst.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 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.

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.

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.

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-012-2	Extreme Cold Weather Preparedness and Operations (Requirements 1–2 effective 4/1/28; Requirement 4 effective 10/1/29) 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.	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 September 2024 - NONE

Periodic Data Submittals Due in October 2024			
10/20/2024	FAC-003	GO, TO	FAC-003-4 - Transmission Vegetation Management: Q3, 2024 Vegetation Outage Reporting – **Align Data Submittal**