

**RELIABILITY FIRST**

Aug. 1, 2025

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

NEW! Align Periodic Data Submittal Issues

After the deployment of Align Release 7.3.0 on July 12, 2025, it was discovered that registered entity users could not assign tasks for in-progress FAC-003-4 or PRC-023-4 Periodic Data Submittal (PDS) requests in Align. The issue only affected “in progress” PDS requests where the entity had not yet assigned responses. To address this issue, RF cancelled the original PDS requests that were not submitted and sent the affected entities new data submittal requests for submission. RF then closed any open Help Desk tickets that were sent in for this issue.

IMPORTANT UPDATE: Please note that starting with the Q3 2025 Submittal, the new RF contact (taking over for Bob Folt) for Periodic Data Submittals and Attestations will be Brandon McCormick. If there are any questions, please reach out directly to Brandon via email at brandon.mccormick@rfirst.org or by phone at 216.218.9413.

NEW! Align Attestation Training for Registered Entities

The ERO Enterprise has published an Align Attestation training recording for registered entities on how to use the newly improved Attestation functionality in Align. The training recording and materials are located on the [Align and SEL webpage](#) under the “Training and Webinars” section. The recording and slides are located under a posting titled “July 15, 2025.”

To complement the training recording, updated Align User Guides are also available on the Align and SEL webpage, under the “Align and SEL Entity User Guides” section. The Align User Guides for Periodic Data Submittals, Self-Certifications, and Attestation modules were updated to reflect the improved functionality deployed with Align Release 7.3.0 on July 12, 2025.



NEW! CIP Low Impact Workshop

The RF Low Impact Workshop will give attendees the opportunity to improve their understanding of security and compliance for CIP assets containing low impact BES Cyber Systems. Attendees will be able to choose from three training tracks on Day 1. Day 2 will be a workshop with presentations and panels on various topics of interest to the CIP low impact community.

[Click here to register](#)

Intended audience:

- Registered entity staff responsible for CIP low impact security or compliance
- Staff of asset owners that may not yet be registered with NERC but want to get a jump on understanding the standards
- ERO personnel interested in furthering their understanding of CIP low impact
- Consultants, contractors, etc. with CIP low impact responsibilities

Agenda:

Day 1, Aug. 19, 8 a.m. to 5 p.m. ET

Three tracks (choose one):

Physical security for CIP low impact assets

– Physical security for low impact assets.

Controls and resources

– Internal controls, Transient Cyber Assets/Removable Media, and the Neighborhood Keeper program.

CIP Low Impact from the Ground Up

– Fundamentals of the ERO and in-depth CIP compliance at the low impact level

Day 2, Aug. 20, 8 a.m. to 5 p.m. ET

One track, workshop format:

– Low impact security and compliance topics

Day 3, Aug. 21, 8 a.m. to 12 p.m. ET

RF CIPC Meeting

- Limited to regular employees of entities registered in the RF footprint
- Other attendees only allowed by approval of RF liaison or CIPC officer

For questions regarding the workshop, please email: low_impact_workshop@rfirst.org

NEW! Cold Weather Preparedness Small Group Advisory Sessions to be held in August

NERC and the Regional Entities, including ReliabilityFirst, will host Small Group Advisory Sessions (SGAS) to discuss the implementation of the Extreme Cold Weather Preparedness Standard, EOP-012-3. While this standard is still awaiting final FERC approval after it was filed with the commission in April, it has a proposed effective date of Oct. 1, 2025.

These meetings are tentatively planned for the week of **Aug. 18, 2025**, and will be held virtually via Webex. There will be a general session to discuss EOP-012-3 on Monday, Aug. 18. Then, SGAS One-on-One Sessions are planned for Tuesday, Aug. 19 - Friday, Aug. 22. These sessions will be closed, one-on-one discussions between a registered entity's Subject Matter Experts (SMEs) and ERO Enterprise staff about issues pertinent to that entity's implementation of EOP-012-3 and any other cold weather-related concerns.

NERC will schedule the one-on-one sessions after registration is received and is coordinated with Regional Entity staff.

[Click here to read more](#)



FALL RELIABILITY & SECURITY SUMMIT



SEPT. 8-10, 2025



WASHINGTON, D.C.



NEW! 2025 Fall Reliability & Security Summit

Join ReliabilityFirst at our annual Fall Reliability & Security Summit, hosted this year at the MGM National Harbor just outside of Washington, D.C.

We'll kick things off with an evening reception and our Reliability Recognition Awards Ceremony on Monday, Sept. 8, followed by an exciting agenda on Tuesday, Sept. 9. We'll be joined by key players across the electric industry, including executives from FERC, NERC, AEP, LS Power, PPL Electric Utilities, Electric Power Supply Association, for a panel discussion as well as presentations on FERC Orders, RF Compliance and Enforcement, and more.

Then on Wednesday, Sept. 10, attendees will be able to choose from three half-day tracks, depending on which focus area makes the most sense for them. These include an energy policy leadership session, an internal controls-focused track for experienced registered entity personnel, and a NERC 101 primer for new registered entities.

To view the full agenda and to register, please visit [the RF website](#).

We hope to see you in September!



NEW! NERC Posts IBR Registration Initiative Q2 Update

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 2025 Update](#) showcases progress made, highlights key activities in Legal, Registration, Standards, 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. More information on this project is available in the [IBR Registration Initiative Quick Reference Guide](#).

Category 2 Generator Owner and Generator Operator Non-BES IBR Update

Phase 3 of the IBR Initiative has started with RF Registration finalizing its reviews of registration documentation received from the entities in final preparation for registrations to begin. New functionality has been added to CORES to facilitate the registration of the new Category 1 and Category 2 IBRs. The new IBR Category 1 and Category 2 functional scopes can now be properly applied and designated as such in the registration record in CORES.

RF will start registering new Category 2 Generator Owners and Generator Operators in August 2025. If you have any Category 1 or Category 2 GO or GOP IBRs pending registration, please make sure that you have provided RF with all of the information listed below that is required to register your entity appropriately. Here is a list of the required documentation needed in order for RF to accurately register these GO and GOP IBRs:

- RF Registration Form (available from [RF's Registration webpage](#))

- Properly completed ERO GO/GOP Asset Verification Form (submitted in Excel format) available from [RF Registration webpage](#)
- Fully executed Generator Interconnection Service Agreement
- Fully executed Operating Agreement (between the GO and GOP, or third-party fulfilling GO and/or GOP compliance obligations), if applicable
- Operating One-Line Diagrams depicting the generation resource (i.e., synchronous generator, individual inverters, etc.) through the "collector system" and generator interconnection Facilities to the point of interconnection with the Transmission Owner (TO) (including the TO's Station Diagram depicting the actual point of interconnection)
- IBRs – Manufacturer Inverter Data Specification Sheets

RF Registration is always available for individual conference calls to assist our entities with these registrations and/or answer any questions pertaining to their respective Category 1 or Category 2 GO and GOP registrations, or the registration process.

If you would like to set up a meeting or require further clarification regarding your respective registration(s), please email Beth Smail at beth.smail@rfirst.org.



Level 3 NERC Alert issued for Essential Actions for Inverter-Based Resource (IBR) Performance and Modeling

Responses to the questions included in the NERC Alert are required to be submitted via the NERC Alert System by Aug. 18, 2025, 12 a.m. ET.

For the latest information and updates, or to find the resource documents related to the IBR Initiative, check out our webpage dedicated to the [Inverter-Based Resource \(IBR\) Registration Initiative](#), which serves as a one-stop-shop resource to everything related to the IBR initiative.



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! Monthly Technical Talk with RF Call

The next Tech Talk with RF will be held on Monday, August 18, at 2:00 PM ET.

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, at 216-503-0617.

August 2025 Technical Talk with RF Event Information

Monday, Aug. 18, 2025, 2:00 PM | (UTC-04:00) Eastern Time (US & Canada)

Join link:

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=m40f6175b7cef6561a96ec5301969f1d3>

Meeting number: 2313 993 1902

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: 231 399 31902

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

Agenda:

What to know about draft NERC Reliability Standard PRC-029-1 and how it will impact inverter-based resources (IBRs)

Dan Ransom, Senior Consulting, Technical Application Engineer, GE Vernova

NERC Reliability Standard PRC-029-1 (Frequency and Voltage Ride-through Requirements for Inverter-Based Resources) is being developed to replace PRC-024 (Frequency and Voltage Protection Settings for Generating Resources) and PRC-026 (Relay Performance During Stable Power Swings) specifically for inverter-based resources (IBRs). This is a strategic shift designed to improve clarity and reliability, especially during grid disturbances, in an increasingly inverter-driven grid by establishing performance-based ride-through requirements tailored to their unique capabilities.

Historically, IBRs were included under PRC-024 and PRC-026, which were originally designed with synchronous generators in mind. However, these standards do not adequately reflect the unique dynamic behavior and control capabilities of IBRs. PRC-029-1 is being developed to establish tailored ride-through requirements—both capability-based and performance-based—specifically for IBRs, ensuring they remain connected and support grid stability during voltage and frequency excursions.

Rate of Change of Frequency and Underfrequency Load Shedding

John “JP” Skeath, Senior Engineer, NERC

JP Skeath will discuss Rate of Change of Frequency as it relates to underfrequency load shedding. With the ever-increasing mix of inverter-based resources powering the electric grid, this relationship has gained importance, as system inertia decreases.

IMPORTANT! NERC Registration and Certification Information

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 Beth Smail, Senior Analyst, Registration and Entity Services, with any questions at beth.smail@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

It is important, and expected, that qualified Registered Entities will join the Electricity Information Sharing and Analysis Center (E-ISAC).¹ E-ISAC membership is available to qualified North American asset owners and operators (AOOs) and select partner organizations, and there is no cost to join. The

E-ISAC encourages individuals with cyber, physical, or operational technology security responsibilities to apply for membership on behalf of your organization. This individual will serve as a point of contact for E-ISAC security-related communications and will have access to emerging threat information and analysis.

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.

^[1] Created in 1999 and located in Washington, D.C., the E-ISAC is operated by NERC. The E-ISAC acts as the primary communications channel for industry members and partners to voluntarily exchange cyber and physical security threat information. E-ISAC security experts analyze this information to identify patterns and trends, providing industry with a detailed view of the threat landscape and advice on how to navigate it. Both NERC and the E-ISAC adhere to a strict [code of conduct](#) that reinforces the E-ISAC's organizational isolation from NERC's enforcement activities.



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.

Upcoming Standards Subject to Future Enforcement

TOP-002-5	Operations Planning	Oct. 1, 2025
CIP-003-9	Cyber Security – Security Management Controls Implementation Plan	April 1, 2026
TPL-008-1	Transmission System Planning Performance Requirements for Extreme Temperature Events Implementation Plan	April 1, 2026
CIP-012-2	Cyber Security – Communications between Control Centers Implementation Plan	July 1, 2026
TOP-003-7	Transmission Operator and Balancing Authority Data and Information Specification and Collection Implementation Plan	Oct. 1, 2026
BAL-007-1	Near-term Energy Reliability Assessments Implementation Plan	April 1, 2027

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

Periodic Data Submittals Due in August 2025

08/29/2025	PRC-004	GO, TO, DP	Protection System Misoperations – Section 1600 data request for Q2-2025 (April 1 – June 30). Submit in MIDAS portal.
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Periodic Data Submittals Due in September 2025 - NONE