



RELIABILITY FIRST

Jan. 7, 2026

To: ReliabilityFirst Compliance Contacts
Subject: RF Compliance Program Update Letter – January 2026

Register for the 2026 ERO Women's Leadership Conference



RF is proud to serve as the host Regional Entity in 2026 for the ERO Women's Leadership Conference on Feb. 25-26 in Cleveland!

This event will be held in-person for the first time and feature a tour de force of dynamic speakers discussing topics including how to ascend the corporate ladder and navigate career challenges, how to nurture your mental and physical well-being, and more. It will immediately follow our 2026 Internal Controls Workshop, making for a power-packed week in Cleveland. Both events will be held at the Aviator, a beautiful event space overlooking the scenic Rocky River and located just minutes from the Cleveland Airport. You won't want to miss this year's event. Check out the full [agenda](#) on our website calendar!

Expect:

- Inspiring keynote speakers from across the country
- Interactive panel discussions on career growth, mentorship, and work-life balance
- Networking sessions to connect with peers and leaders
- Professional head shot photo opportunity

Please [click here](#) to register. Please note: The cut-off date for hotel room block reservations is February 7, 2026.

Register for ReliabilityFirst's 2026 Internal Controls Workshop



INTERNAL CONTROLS WORKSHOP

FEB. 23-25, 2026 | CLEVELAND, OH



Join ReliabilityFirst on Feb. 23-25 in Cleveland for a dynamic and engaging Internal Controls Workshop that kicks off a power packed week focused on Compliance Monitoring (CIP and O&P) and Enforcement. This interactive experience features small group discussions, opportunities to share industry insights, and a flexible format that lets you choose your own learning tracks. Whether you prefer to explore a variety of topics or dive deep into specific areas, this workshop is designed to foster meaningful conversations and practical takeaways.

Please [click here](#) to register. Please note: The cut-off date for hotel room block reservations is February 7, 2026.

NEW! NERC Releases New FAQ to Support Category 2 GO/GOP Registration

NERC has published a new [Frequently Asked Questions \(FAQ\)](#) document to support Generator Owners and Generator Operators registering as Category 2 entities under the Inverter-Based Resource (IBR) Registration Initiative. The FAQ provides additional clarity on the registration process, including eligibility and jurisdiction considerations, documentation expectations, timelines, and common questions. It also supports NERC's efforts to promote a clear and consistent understanding of registration requirements as we navigate the rapidly evolving landscape of energy generation and integration.

NEW! NERC Publishes FAQ from Cold Weather Advisory Sessions

NERC has published a [FAQ document](#) from the 2025 Cold Weather Small Group Advisory Sessions (SGAS) conducted in August 2025. The focus of this SGAS was NERC Reliability Standard EOP-012-3, Extreme Cold Weather Preparedness and Operations, and this document provides ERO Enterprise responses to frequently asked questions received on this topic.

NEW! NERC Lesson Learned Posted

The NERC Lessons Learned page was updated with one new lesson learned: [Load Shed for Voltage Instability.](#)

NEW! Align Release 7.5.0

Align Release 7.5.0 successfully deployed on December 6, 2025. This deployment included:

- Modifications such as adding a place on Self-Certifications to allow the Regional Entities to upload a summary letter that the entity can view and download, notification email to the registered entity when an entity responds to a Self-Certification Request for Information (RFI), minor enhancements to the PDS Distribution and Self-Certification Distribution screens, a fix to a formula in the disposition workflow;
- Updates to permissions on the PNC Review and the Disposition processes to allow regional staff to assign staff to the object to give them ability to action the record;
- Corrections to the mitigation workflows to address bugs from Release 7.4 related to:
 - Capturing the mitigation acceptance date on the mitigation record,
 - Sending the mitigation acceptance email,
 - Capturing the date certification received;
- Updates to the reporting universe to:
 - Allow Canadian Regulators to run read-only reports, and
 - Add jurisdiction and CEA data element to a custom report folder; and
- Update to the entity information module on how jurisdiction field is captured on the entity record, adds the ability for entities to request extensions on Audit RFIs, moves RFIs and Internal Controls Assessment to their own tab within a Monitoring Engagement.

The Align Release Notes 7.5.0 provide the specific changes and indicate the users affected as well as if any training materials were modified. These details are documented in the Align Release Notes 7.5.0, published on December 6, 2025, and can be found on the [Align and SEL webpage](#) under the "Release Materials" section.

REMINDER! Align Deactivating Inactive Accounts in 2026

Starting in 2026 (Quarter 2), the ERO Enterprise will implement a bi-weekly automatic review of inactive user accounts in the Align production environment. In support of access management and security hygiene, if a user account is found to be inactive for five quarters, it will be deactivated in the system. Prior to any user deactivation, Align users with more than 90 days of inactivity in the system will be notified via email on the following schedule:

- After 90 days of inactivity
- After 225 days of inactivity
- After 420 days of inactivity

All Align users are encouraged to regularly log into Align and avoid deactivation when the automatic review begins later in 2026. When the automatic review happens for the first time, any user accounts that have been inactive for five quarters will be disabled immediately without notification. Any users with inactivity ranging from 90 days to five quarters of inactivity will receive an email with the automatic reviews beginning next year. To avoid this potential impact to your account, please ensure you routinely access the Align system.

NEW! Blackstart Resource Availability and Readiness in the Eastern and Western Interconnections

NERC and Regional Entity staff have successfully completed a [comprehensive study](#) on Blackstart Resource Availability and Readiness in the Eastern and Western Interconnections. This joint initiative focuses on the availability and readiness of natural gas and dual fuel blackstart resources to operate during extreme cold weather conditions. This study was conducted in response to Recommendation 3 from the Inquiry Into Bulk-Power System Operations During December 2022 Winter Storm Elliott report, published October 2023.

Reminder! Level 2 NERC Alert on Large Load Interconnection, Study, Commissioning, and Operations

In September 2025, NERC issued a [Level 2 Alert](#) on Large Load Interconnection, Study, Commissioning, and Operations to address reliability risks from rapidly changing, high-demand loads like data centers. The Level 2 Alert was issued in response to a series of disturbances where unexpected large load output reduction occurred between 2024-2025, and was sent to Distribution Providers (DP), Resource Planners (RP), Transmission Owners (TO), Transmission Operators (TOP), Transmission Planners (TP), Balancing Authorities (BA), Planning Coordinators (PC), and Reliability

Coordinators (RC). Responses to the questions included in the NERC Alert are required to be submitted via the NERC Alert System by **January 28, 2026, 12 a.m. ET**. On November 6, 2025, NERC Staff hosted a webinar on the Level 2 Alert. The [informational Webinar](#) provided an overview of the recommendations and discussed industry questions related to the alert.



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. [NERC's IBR Registration Initiative Q3 2025 Update](#) showcases progress made, highlights key activities in Legal, Registration, Standards, Stakeholder Outreach, and E-ISAC Engagements, and provides available resources.

RF started 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.



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, January 12, 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.

January 2026 Technical Talk with RF Event Information

Monday, Jan. 12, 2026, 2:00 | (UTC-04:00) Eastern Time (US & Canada)

Join link:

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=m8db680ff46d8903fda28af43af02cb5>

Meeting number: 2310 742 4349

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: 231 074 24349

Agenda

CIP Cloud Standards Update

Lew Folkerth, Principal Reliability Consultant, External Affairs, RF

Lew will provide an overview of the Project 2023-09 Risk Management for Third-Party Cloud Services drafting team's plans for developing new CIP standards which will enable use of cloud technologies in a secure manner.

2025 Enforcement Year in Review

Marian Toney, Counsel, Enforcement, RF

Marian will review highlights and trends from RF's enforcement work in 2025.

Strategies for building an Internal Network Security Monitoring program

Ron Ross, Principal Reliability Consultant, Entity Engagement, RF

Ron will discuss NERC Reliability Standard CIP-015-1 (Internal Network Security Monitoring (INSM)) and some strategies for organizations to employ while developing their INSM program.

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. Alternatively, 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

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
PRC-024-4	Frequency and Voltage Protection Settings for Synchronous Generators, Type 1 and Type 2 Wind Resources, and Synchronous Condensers	Oct. 1, 2026
PRC-029-1	Frequency and Voltage Ride-through Requirements for Inverter-based Resources	Oct. 1, 2026
PRC-030-1	Unexpected Inverter-Based Resource Event Mitigation	Oct. 1, 2026

