

**RELIABILITY FIRST**

July 1, 2024

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

## **NEW! Documentation Requirements for New GO/GOP Registrations**

RF has been seen a significant increase in new entity registrations over the past 12 months and anticipate this trend will continue in 2025 and beyond with the addition of non-BES IBR resources. RF would like to remind Generator Owners (GO) and Generator Operators (GOP) of what types of documentation are required when registering new GO and GOP resources in 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@rfirst.org](mailto: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.

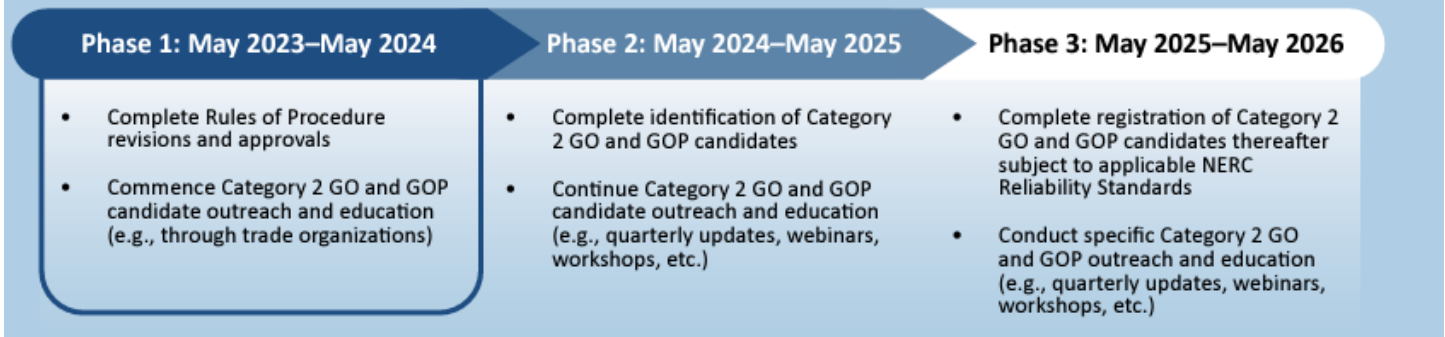
## **NEW! Proposed Data Request on Cold Weather Generator Data Collection Posted for Comment**

Pursuant to NERC Rules of Procedure Section 1600, NERC has posted a proposed data request regarding generators' operation during cold weather for a 45-day comment period. The proposed data request is in response to a Federal Energy Regulatory Commission directive to develop a plan to collect data on the winterization of generating units and to submit an annual informational filing on the analysis of the data. Comments can be made using the following [comment matrix](#). The deadline for providing comments is 07/29/2024.



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](#).

## IBR Registration Milestones



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](#).

### **IMPORTANT! Annual Reminder - 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 attached to this email 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.



### **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.**

### **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](mailto:memberservices@eisac.com) with any questions.



## Monthly Technical Talk with RF Call

The next Tech Talk with RF will be held on **Monday, July 15**, from 2 to 3:30 p.m. EST.

### July 2024 Technical Talk with RF

Monday, July 15, 2024 2:00 PM | (UTC-05:00) Eastern Time (US & Canada)

Join link:

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=mc62259c4a53874b0f2791a27adefe2b5>

Meeting number: 2303 366 7774

Meeting password: 0123456

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

Access code: 2303 366 7774

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

### Agenda Topics

**Christmas in July** – a look back at system performance during the 2023-2024 winter; and a look ahead to this upcoming winter, as we work together to mitigate risks due to extreme cold weather.

### System Performance Review of the January 2024 Arctic Storms

Matt Lewis, NERC Manager of Event Analysis

Kiel Lyons, NERC Senior Manager, Compliance Assurance

Chanel Chasanov, Attorney-Advisor in FERC's Office of the General Counsel

Robert Clark, Electrical Engineer in FERC's Office of Electric Reliability

- Extreme cold weather events have shown the need for the natural gas and electric systems, and the underlying infrastructure that supports their operations, to continue to prepare for extreme cold weather. The NERC and FERC team will provide a recap of system performance during Winter Storms Gerri and Heather, which impacted our region from Jan. 10 to 17, 2024, plus review recommendations from FERC-NERC-Regional Entity joint reports.

### ReliabilityFirst Cold Weather Winterization and Small Group Advisory Sessions

Mike Hughes, Manager, Entity Engagement, RF

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

- The RF team will provide an overview of our Cold Weather Winterization program, plus a look back at our site visits from this past winter and performance in the RF region. The team will also touch upon NERC's recent Small Group Advisory Sessions (SGAs) which provided an educational opportunity for registered entities to meet with NERC and the Regional Entities to discuss cold weather preparedness Reliability Standards including EOP-011, EOP-012, and TOP-002.

These presentations are especially relevant for RTOs, utilities, and generators facing reliability risks due to extreme cold weather. State commission staff and others in regulatory affairs may also be interested in the steps that NERC and the regions are taking to enforce new Reliability Standards, share best practices, lessons learned, and recommendations from previous events to drive continuous improvement in mitigating these risks.

## **NEW! 2024 RF Protection System and Human Performance Workshops**

**Registration is now open** for the RF 2024 Protection System and Human Performance Workshops on Aug. 7-8, 2024! These events will be held virtually via WebEx. There is no charge to attend these events and both events are open to anyone who would like to attend. Please forward this notice along to anyone who may be interested. Agendas and additional information are currently being developed and will be available soon.

### **10th Annual Protection System Workshop for Technical Personnel - [Register Now](#)**

Aug. 7, 2024 | 9:00 a.m. – 1:00 p.m. Eastern

This workshop will cover a diverse range of topics and discussions relative to Protection Systems tailored to the needs of substation and transmission maintenance personnel; protection and controls experts; operations control room staff, including tools support personnel for EMS and SCADA; and asset design groups (substation and transmission). It will include speakers from RF, industry subject matter experts, and others. Please see the [RF website](#) for the full agenda.

### **7th Annual Human Performance Workshop - [Register Now](#)**

Aug. 8, 2024 | 9:00 a.m. – 1:00 p.m. Eastern

This workshop will focus on practical application of human performance techniques and concepts for front-line activities that attendees can retain and use in transmission reliability related work areas such as operations, asset management, design, protection, maintenance, and others. The ideas, suggestions and stories shared during this highly interactive, free event are especially relevant for human resources professionals; asset management groups; internal control champions and specialists; company trainers; and leadership and others interested in these topics. Please see the [RF website](#) for the full agenda

## **Important! NERC Registration Information**

### **REMINDER - 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).

### **Check out the improved RF Registration [web page](#) on the RF public website**

The new RF Organization Registration web page provides an overview of key concepts, processes, North American Electric Reliability Corporation (NERC) resources, and contact information in support of entity functional registration. This web page is designed to be a one-stop-shop location for everything related to Organization Registration. Whether an entity is new to NERC registration or a registered entity that has been in operation and registered for years, there is valuable information available here for everyone.

Registration is defined by the NERC Organization Registration program in Section 500 of the [NERC Rules of Procedure](#), and the Organization Registration Manual and Statement of Compliance Registry Criteria can be found in the NERC Rules of Procedure Appendices 5A and 5B.

For questions about the registration process within the ReliabilityFirst region, or to register an entity on the NERC Compliance Registry, please submit requests to [compliance@rfirst.org](mailto:compliance@rfirst.org).

Information provided in the RF Organization Registration web page includes:

- NERC ERO Enterprise 101 Information Package
- ERO Enterprise Onboarding Checklist for new registered entities
- **New!** ERO Enterprise GO GOP Asset Verification Form
- RF ERO Registration Form
- RF Organization Registration procedure
- Overview of Entity Registration process
- Registered Entity Contact maintenance process
- JRO and CFR registration guidance
- BES Definition and Implementation guidance
- Links to NERC resources about 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](mailto: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](mailto: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 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.

## **NERC 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](mailto:AskAlign@NERC.net) for additional information.

## 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](https://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](https://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-012-1 | 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 July 2024 |         |        |  |
|---|---------|--------|--|
| 7/20/2024                                 | FAC-003 | GO, TO | FAC-003-4 - Transmission Vegetation Management: Q2, 2024 Vegetation Outage Reporting – <b>Align Data Submittal</b> |

| Periodic Data Submittals Due in July 2024 |         |        |  |
|---|---------|--------|--|
| 7/20/2024                                 | FAC-003 | GO, TO | FAC-003-4 - Transmission Vegetation Management: Q2, 2024 Vegetation Outage Reporting – <b>Align Data Submittal</b> |

| 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). |

| 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). |