

March 4, 2024

To: ReliabilityFirst Compliance Contacts

Subject: RF Compliance Program Update Letter – March 2024





# **NERC Launches IBR Initiative Resources to Highlight Progress and Inform Stakeholders**

As part of its <u>Inverter-Based Resource Strategy</u>, NERC is dedicated to identifying and addressing challenges associated with inverter-based resources (IBR) as the penetration of these resources continues to increase. ERO Enterprise assessments identified a reliability gap associated with the increasing integration of IBRs as part of the grid in which a significant level of bulk power system-connected IBR owners and operators are not yet required to register with NERC or adhere to its Reliability Standards.

In response, FERC issued an <u>order</u> in 2022 directing NERC to identify and register owners and operators of currently unregistered bulk power system-connected IBRs. Working closely with industry and stakeholders, NERC is executing a FERC-approved work plan to achieve the identification and registration directive by 2026.

In Phase 1 of this project, NERC worked with the Regional Entities to develop potential <u>Rules of Procedure revisions</u> to address registration of owners and operators of unregistered IBRs that have an aggregate, material impact. The proposed revisions, which were approved by NERC's Board of Trustees on Feb. 22 and will be submitted to FERC in early March, would result in materially impactful IBRs becoming subject to NERC's Reliability Standards, commensurate to the amount of BPS-impactful synchronous resources currently subject to these standards. This proposal addresses revisions to NERC registration process rules; however, additional projects will focus on the standards development process as NERC Reliability Standards are updated consistent with FERC directives under <u>Order 901</u>.

NERC is launching several initiatives to ensure industry and stakeholders are kept informed throughout this critical, three-phase project.

For additional information, read the <u>Full Announcement</u> and <u>IBR Registration Initiative Quick</u> Reference Guide here.

# II. Inverter Based Resource Owners and Operators

# **IBR Registration Milestones**

#### Phase 1: May 2023-May 2024 Phase 2: May 2024-May 2025 Phase 3: May 2025-May 2026 Complete Rules of Procedure Complete identification of Category Complete registration of Category 2 revisions and approvals 2 GO and GOP candidates GO and GOP candidates thereafter subject to applicable NERC Commence Category 2 GO and GOP **Reliability Standards** Continue Category 2 GO and GOP candidate outreach and education candidate outreach and education (e.g., through trade organizations) (e.g., quarterly updates, webinars, Conduct specific Category 2 GO workshops, etc.) and GOP outreach and education (e.g., quarterly updates, webinars, workshops, etc.)

# **NEW!** Align Release Notes 6.0.0 Posted

The ERO Enterprise has posted the Release Notes 6.0.0 outlining the Align changes that became effective March 3, 2024. This was a significant release containing several enhancements, fixes, and improvements to system functionality that will better enhance the CMEP process for the entities and Regional Entities alike. Enhancements included new or improved functionality, workflows, reports, etc. These changes are expected as these CMEP tools are adjusted from their initial deployment to provide additional user functionality, efficiency, and enhancements to usability. Read Release notes here.

#### **Important!** NERC Registration Information You Need to Know

#### **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.

#### **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: <a href="https://www.eisac.com/portal">https://www.eisac.com/portal</a>. You may also contact the E-ISAC at memberservices@eisac.com with any questions.

### **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 <a href="MERC.Alert@nerc.net">NERC.Alert@nerc.net</a> 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.



# **Monthly Technical Talk with RF Call**

The next Tech Talk with RF will be held on Monday, March 11, from 2 to 3:30 p.m. EDT.

#### March 2024 Technical Talk with RF

Monday, March 11, 2024 2:00 PM | (UTC-05:00) Eastern Time (US & Canada)

Join link:

https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=m97343b64c896a3c8258b9a0d3480f5e3

Meeting Number number: 2303 360 0263

Meeting password: 0123456 (0123456 from phones and video systems)

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

Access code: 230 336 00263

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

## **Agenda Topics**

#### **NERC Standards Updates**

Latrice Harkness, Director of Standards Development, NERC

• Latrice will give an overview of new NERC Reliability Standards that will be going into effect on April 1, 2024.

#### **Overview of RF Regional Risk Assessment**

Johnny Gest, Manager, Engineering and System Performance, RF

• Johnny will introduce RF's latest Regional Risk Assessment and discuss the various risks and RF's methodology in formulating the report.

### Save the Date! RF Fall Reliability and Security Summit, Sept. 17-18

Formerly known as the Fall Workshop, next year's Fall Reliability and Security Summit will take place **Sept. 17-18** at the vibrant Conrad Indianapolis (50 West Washington Street, Indianapolis, IN 46204). Please save the date, mark your calendars, and stay tuned for additional information on topics and agendas.

# **Save the Dates!** 2024 RF Protection System and Human Performance Workshops

Please mark your calendars for the 2024 RF Protection System and Human Performance Workshops. that will be held Aug. 7-8 at the RF offices in Independence, Ohio. The agenda and registration information will be made available closer to the meeting dates.

## **NEW! 2024 System Operator Conferences being offered by SERC**

The SERC System Operator Working Group (SOWG) is pleased to announce the 2024 System Operator Conference (SOC) locations and dates. The planning for 2024 SOCs is well under way and registration links are below. The theme for 2024 is "Securing the Grid of the Future" and those who complete it will earn up to 19 continuing education hours (CEHs) (Operating) depending upon which conference you attend. The topics for 2024 include 9 hours of classroom instruction on the following:

- Winter Storm Elliott
- NERC Reliability Standards
- Critical Infrastructure Protection (CIP) physical/cyber risks to the Electric Reliability Organization (ERO)
- Electricity Information Sharing Analysis Center (E-ISAC) industry trends and operator engagement
- Enhancing operator understanding of transmission loading reliefs (TLRs)
- CIP and the impact to Human Performance
- Lessons Learned
- Black Start Operations

Additionally, there are **10 hours of hands-on simulation exercises.** 

#### **2024 SOC fees:**

- \$495 for in-person attendance for 19 CEHs.
- \$695 for a virtual attendance option to Conference #3 for 19 CEHs. A separate account provided with this registration allows learners to work at their own pace and receive 10 CEHs (part of the 19) for simulation hours.
- \$330 for a virtual attendance option to Conferences #3 for 9 CEHs. This option is for those learners who do not need simulation hours.

#### Dates and locations for 2024 SOCs:

Please register as soon as you can; space may be limited at certain locations. We are looking forward to seeing everyone.

- SOC #1: April 9-11, 2024, at Embassy Suites, Greenville, SC
  - o Registration Link: <u>2024 SOC #1 Event Details</u>
- SOC #2: May 21-23, 2024, at Embassy Suites, Lexington, KY
  - o Registration Link: <u>2024 SOC #2 Event Details</u>
- SOC #3: October 15-17, 2024, at Embassy Suites, Tampa, FL (Hybrid Option)
  - o Registration Link: 2024 SOC #3 Event Details



#### <u>IMPORTANT REMINDER – UPDATE COMPLIANCE CONTACT INFORMATION in CORES</u>

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 each Primary Compliance Contact (PCC), Primary Compliance Officer (PCO) and Alternate Compliance Contact (ACC) in the ERO Portal/CORES system.



## **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 <u>NERC Align Project page</u> 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 <u>NERC Training Site</u>.

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 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: <a href="mailto:support.nerc.net">support.nerc.net</a>.

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						
FAC-003-5	Transmission Vegetation Management	April 1, 2024				
FAC-011-4	System Operating Limits Methodology for the Operations Horizon	April 1, 2024				
FAC-014-3	Establish and Communicate System Operating Limits	April 1, 2024				
IRO-008-3	Reliability Coordinator Operational Analyses and Real-time Assessments	April 1, 2024				
PRC-002-4	Disturbance Monitoring and Reporting Requirements   Implementation Plan	April 1, 2024				
NEW! PRC-023-6	Transmission Relay Loadability   Implementation Plan	April 1, 2024				
PRC-026-2	Relay Performance During Stable Power Swings   Implementation Plan	April 1, 2024				
TOP-001-6	Transmission Operations	April 1, 2024				
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 February 16, 2024, and it is pending FERC approval.	Oct. 1, 2024				

# **2025 Upcoming Standards Subject to Future Enforcement**

IRO-010-5	-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					
TOP-003-6.1	TOP-003-6.1 – Transmission Operator and Balancing Authority	July 1, 2025				
	Data and Information Specification and Collection					
	Implementation Plan					

Please refer to the <u>U.S. Effective Dates</u> page on the NERC website for additional detail.

Periodic Data Submittals Due in March 2024					
3/31/2024	PRC-023		PRC-023-4 - Transmission Relay Loadability — Annual Data Submittal - <b>Align Data Submittal</b>		

Periodic Data Submittals Due in April 2024					
4/20/2024	FAC-003	GO, TO	FAC-003-4 - Transmission Vegetation Management: Q1, 2024 Vegetation Outage Reporting – <b>Align Data</b> Submittal		