RELIABILITY FIRST

March 6, 2026

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

NEW! NERC Reliability Standards Effective April 1, 2026

- **CIP-003-9**   Cyber Security – Security Management Controls | Implementation Plan
- **TPL-008-1**   Transmission System Planning Performance Requirements for Extreme Temperature Events | Implementation Plan

REMINDER - If any of the above-mentioned standard versions is included in an active Coordinated Functional Registration (CFR) agreement, the respective CFR agreement(s) must be revised to include the updated versions of the Standards and Requirements. Any changes or updates to existing CFR agreements and respective division of compliance responsibilities must be made using the NERC CFR portal.

NEW! IBR Registration Initiative – Category 2 Generator Owner and Generator Operator Small Group Advisory Sessions (SGAS)

NERC, in collaboration with the Regional Entities, will host a SGAS for those entities that have been identified and notified during the Inverter-Based Resources Registration Initiative for registration with NERC as a Category 2 Generator Owner (referred to as GO-2) and/or Category 2 Generator Operator (referred to as GOP-2). The target audience for this SGAS will be GO-2s and GOP-2s with no previous NERC Regulatory experience.

This SGAS will help GO-2s and GOP-2s understand their compliance obligations and prepare for implementation. Specifically, the SGAS will cover the set of Reliability Standards that GO-2s and GOP-2s must comply with in 2026. The SGAS will consist of two parts: General Session Live Webinar and closed one-on-one discussions. The general session will be held on **Thursday, March 26, 2026, 2:00-4:00 p.m. ET.** To register for the webinar, please visit: https://nerc.webex.com/weblink/register/r8f04e0a906caa6e23cb5168377a7f61a. To register for a one-on-one session, please email charlie.cook@nerc.net by Friday, March 6th.

NEW! Update Duo Mobile to Maintain Access to NERC Applications

NERC uses multifactor authentication to help protect applications and information. Duo Mobile will update its digital certificates on March 31, 2026, and will require users to run the most current version of the app. If you use Duo Mobile to access NERC applications, please update your app to Version 4.85.0 or greater by March 31, 2026. Devices running older versions may experience issues completing multifactor authentication or receiving push notifications after that date. Users may also see a message within the Duo Mobile app indicating that an update is required. To update your app, open your device's App Store, search Duo Mobile, and tap Update.

NEW! 2026 ERO Enterprise CMEP Implementation Plan

The Electric Reliability Organization (ERO) Enterprise Compliance Monitoring and Enforcement Program (CMEP) [Implementation Plan](#) (IP) is the annual operating plan used by the ERO Enterprise (collectively NERC and Regional Entities) to perform CMEP responsibilities and duties. The ERO Enterprise executes CMEP activities in accordance with the NERC Rules of Procedure (including Appendix 4C), the respective Regional Delegation Agreements, and other agreements with regulatory authorities in Canada and Mexico. The Rules of Procedure require development of an annual CMEP IP. As part of our ongoing evaluation of reliability risks and alignment of the CMEP IP with observed system conditions, the ERO Enterprise updated the CMEP IP to place increased focus on Communication Protocols and the issuance of Operating Instructions.

NEW! 2025 ERO ORCP and CMEP Annual Report Posted

The Electric Reliability Organization (ERO) Organization Registration and Certification Program (ORCP) and Compliance Monitoring and Enforcement Program (CMEP) [Annual Report](#) is now available on NERC's website. The 2025 annual report identified four focus areas for achieving success in its vision and mission: energy, security, engagement, and agility and sustainability. The 2025 annual report illustrates ORCP and CMEP efforts to help achieve success in the identified four focus areas, and therefore the ERO Enterprise vision and mission.

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.

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 Q4 2025 Update showcases progress made, highlights key activities in Legal, Registration, Standards, Stakeholder Outreach, and E-ISAC Engagements, and provides available resources.

RF is in the final stretch of registering identified Category 2 Generator Owners and Generator Operators. 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.

IBR Registration Milestones

Phase 2: May 2024–May 2025
- Complete Rules of Procedure revisions and approvals
- Commence Category 2 GO and GOP candidate outreach and education (e.g., through trade organizations)

Phase 2: May 2024–May 2025
- Complete identification of Category 2 GO and GOP candidates
- Continue Category 2 GO and GOP candidate outreach and education (e.g., quarterly updates, webinars, workshops, etc.)

Phase 3: May 2025–May 2026
- Complete registration of Category 2 GO and GOP candidates thereafter subject to applicable NERC Reliability Standards
- Conduct specific Category 2 GO and GOP outreach and education (e.g., quarterly updates, webinars, workshops, etc.)

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.

NEW! Monthly Technical Talk with RF Call

March 2026 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

March 2026 Technical Talk with RF
Monday, March 16, 2026, 10-11:30 a.m. ET
Join link:
https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=mcd2d5f16b3e3c1093bcdab7fea0a5215
Meeting number: 2307 554 4654
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: 230 755 44654
Please join us on Slido.com using #TechTalkRF as the event code.

Agenda

Resource adequacy concerns loom in RF region amid surging load growth

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

Tim will discuss RF's 2026 Resource Adequacy Report, published in February. The report evaluates projected future grid reliability, load growth, changes in the generation mix, and key risks including generation retirements, policy volatility, permitting delays, and supply chain constraints.

Implications of artificial intelligence-related data center energy use and emissions

Benjamin C. Lee, Professor of Electrical and Systems Engineering and Computer and Information Science, University of Pennsylvania

Dr. Benjamin Lee from the University of Pennsylvania, will provide a systems-level view of how more efficient computing can enable sustainable data centers for artificial intelligence. He examines the growing energy and grid impacts of AI, evaluates emerging data center technologies, and discusses how infrastructure design, workload management, and energy integration must evolve to support long-term, sustainable AI growth.

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	April 1, 2026
TPL-008-1	Transmission System Planning Performance Requirements for Extreme Temperature Events	April 1, 2026

CIP-012-2	Cyber Security – Communications between Control Centers	July 1, 2026
TOP-003-7	Transmission Operator and Balancing Authority Data and Information Specification and Collection	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
BAL-007-1	Near-term Energy Reliability Assessments	April 1, 2027
CIP-015-1	Cyber Security – Internal Network Security Monitoring	Oct. 1, 2028

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

Periodic Data Submittals Due in March 2026			
03/31/2026	PRC-023-6	GO, TO, DP, PA/PC	PRC-023-6 - Transmission Relay Loadability – Annual Data Submittal - Align Data Submittal

Periodic Data Submittals Due in April 2026			
04/20/2026	FAC-003-5	GO, TO	FAC-003-5 - Transmission Vegetation Management: Q1, 2025 Vegetation Outage Reporting – Align Data Submittal