

**RELIABILITY FIRST**

May 5, 2026

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

## **NEW! NERC Issues Level 3 Alert, Reliability Guideline Focused on Large Load Challenges**

NERC released a [Level 3 Essential Action Alert](#), Computational Load Modeling, Studies, Instrumentation, Commissioning, Operations, Protection, and Control, outlining seven actions registered entities must implement to address immediate risks posed by computational loads interfacing with the BPS. The Level 3 Alert was issued as NERC observed customer-initiated large load reductions and significant oscillations that occur in seconds, leaving little or no room for real-time responses, threatening BPS reliability. **The deadline for registered entities** (Transmission Planners, Planning Coordinators, Transmission Owners, Balancing Authorities, Reliability Coordinators, and Transmission Operators) **to submit their responses is August 3, 2026.**

In another move to address emerging large loads, NERC also released new voluntary guidelines to safeguard grid reliability. The [Reliability Guideline: Risk Mitigation for Emerging Large Loads](#), recommends actions for traditional utilities and grid operators, and the companies behind these emerging large loads including equipment manufacturers. The goal is to ensure that as more industrial-scale consumers connect to the grid, they actively participate in practices that protect grid stability. These steps highlight that proactive planning and participation can enable even more of these facilities to come online reliably and quickly.

## **NEW! ReliabilityFirst Updates Attachment C templates**

ReliabilityFirst's Attachment Cs have been updated to reflect the latest versions of the applicable NERC Operations & Planning (O&P) Standards. These updates ensure that population and data sampling requests remain aligned with current requirements and expectations.

The revised Attachment Cs are used at the beginning of compliance engagements to support population identification and sampling, helping establish a clear and consistent foundation for evidence requests throughout the engagement.

The updated templates are [available for download on the ReliabilityFirst website](#). Entities are encouraged to use the most current versions when preparing for upcoming engagements.

If you have questions regarding the updated Attachment Cs or their use during an engagement, please contact your ReliabilityFirst Compliance representative.

## **NEW! Proactive Scheduling: Managing Long-Lead Vendor Scheduling for Mandatory Activities**

NERC and the Regional Entities are aware that many registered entities are experiencing significant lead times when coordinating with external vendors for required testing, maintenance, other interconnection or compliance-based activities. For example, various NERC Reliability Standards (e.g., FAC-002 under Project 2022-04) will or currently require electromagnetic transient (EMT) modeling or EMT model validation (e.g., MOD-026-2). For inverter-based resources, PRC-029, a necessary step to help ensure reliable operations, has additional challenges that could largely depend upon external third-party interactions. In many instances, vendors are now scheduling these mandatory activities 12 to 18 months in advance. The need for external vendor support may continue to grow.

To ensure continued system reliability, security and compliance, we strongly recommend the following actions:

- Immediate scheduling – We encourage registered entities to initiate scheduling with vendors as soon as possible. Relying on historical lead times may result in missed deadlines under current market conditions, resulting in possible reliability or security concerns.
- Contingency documentation – Maintain a detailed log or record of vendor coordination, including initial request dates, vendor responses, and confirmed schedules.
- Record of unforeseen changes – In the event a vendor cancels, delays, or reschedules a required activity due to circumstances beyond your control (e.g., supply chain issues or labor shortages), ensure you maintain a comprehensive record of the communication and your efforts to find an alternative solution.

Please note: Future enforcement activities or mitigation evaluations may consider proactive actions taken well in advance. Demonstrating that your entity attempted to schedule required activities early and maintained documentation of vendor-driven delays can be a significant factor in the evaluation of compliance efforts. When reviewing potential non-compliance, the NERC and the Regional Entities take a holistic view of the circumstances. **If you anticipate that vendor availability will prevent you from meeting a specific NERC or provincial reliability deadline, please contact your Regional Entity.**

## **NEW! PRC-029-1 Inverter-Based Resource Ride-Through Design Evaluation Implementation Guidance**

A new proposed Implementation Guidance document for PRC-029 has been posted on the ERO Enterprise Implementation Guidance [webpage](#).

## **NEW! NERC Outlines Recommendations to Mitigate Wildfire Risk, Ensure Grid Reliability**

NERC released [its report](#), Reducing the Risk of Wildfire Ignition by the Bulk Power System, which outlines current industry practices and recommendations to mitigate wildfire ignition risk. The report was developed in response to a directive from the Federal Energy Regulatory Commission (FERC) and builds on NERC's Wildfire Mitigation Guide, first issued in 2021 and updated as part of this effort. The report reflects a coordinated North American-wide effort to ensure that wildfire prevention, detection, and mitigation practices are available for consideration ahead of the next fire season.

## **NEW! ERO Enterprise Compliance Monitoring and Enforcement Manual v9 and ERO Enterprise Compliance Auditor Checklist v7**

NERC published Version 9 of the [ERO Enterprise Compliance Monitoring and Enforcement Manual](#), which documents the ERO Enterprise's current approaches used to assess a registered entity's compliance with Reliability Standards and addresses sanctions and mitigations of confirmed violations. Version 7 of the [ERO Enterprise Compliance Audit Checklist](#) was also published, which follows the organization of the Auditor Handbook within the manual and consists of three primary areas, tasks that support the areas, and action items to support the tasks.

## **NEW! Reliability Standard Audit Worksheets (RSAWs)**

NERC published new Reliability Standard Audit Worksheets (RSAWs) for new and revised Reliability Standards, MOD-033-3, PRC-024-4, PRC-029-1, PRC-030-1, and TOP-003-7. The RSAWs are posted to the [RSAW webpage](#) under "Current RSAWs for Use." These Reliability Standards have an effective date of October 1, 2026. RSAWs are a guide provided by the ERO Enterprise (collectively NERC and Regional Entities) that describes types of evidence registered entities may use to demonstrate compliance with a Reliability Standard. RSAWs also include information regarding how the ERO Enterprise may assess that evidence. RSAWs do not require specific evidence to be provided, and they are not intended to require a single, exclusive approach to assessing compliance with a Reliability Standard.

## **NEW! Critical Infrastructure Protection Evidence Request Tool Webinar Recording**

The webinar on Monday, March 23, 2026, showcased the newest release of the Critical Infrastructure Protection (CIP) Evidence Request Tool (ERT) Version 10. Elliot Weishaar, MRO CIP Compliance Engineer, is co-lead of the ERO Enterprise sub-group that maintains and revises the CIP ERT. He reviewed the latest release of the CIP ERT, detailed the most recent changes and improvements, and answered questions from attendees with other representatives from the ERO Enterprise. Please watch the recording of the webinar [here](#).

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

Align Release 7.6.1 successfully deployed on April 25, 2026. This deployment included modifications, such as correcting an issue related to new PDS creations for registered entities with active Attestations; addressing slow loading of the Active Registrations tab; and fixing a validation issue related to closing dispositions. The Align Release Notes 7.6.1 provide 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 7.6.1, published on April 25, 2026, and can be found on the [Align and SEL webpage](#) under the "Release Materials" section. If you have questions, please [submit a ticket](#).

## **Reminder! Winter 2025-2026 Cold Weather Reporting for All U.S. Category 1 Generator Owners**

The Federal Energy Regulatory Commission (FERC) issued an order on February 16, 2023, Quick Links directing NERC to work with commission staff 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. Specifically, NERC was directed to develop a plan that included, at a minimum, data that will help FERC understand what portion of a generator's fleet is capable of performing at the Extreme Cold Weather Temperature for the location, what portion is under a corrective action plan (and until when), and what portion will not be winterized due to declared constraints. **All NERC-registered entities in the United States with a Category 1 Generator Owner function and units that operated between December 1, 2025, and March 31, 2026, must respond by June 1, 2026.** Entities may amend data submitted until July 1, 2026. Virtual training sessions will be held in May to provide instruction on completing the reporting worksheet and submitting it to NERC via the Cold Weather Generator Data Application. For more information, visit: <https://www.nerc.com/programs/compliance/cold-weather-generator-data-request>.

## 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
- After 434 days of inactivity
- After 449 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

NERC filed its Inverter-Based Resource (IBR) Registration [work plan update](#) with the Federal Energy Regulatory Commission (FERC), which reports that NERC and the Regional Entities have processed registration for 100% of entities with identified inverter-based resources (IBRs). This closes a critical reliability gap and advances ongoing efforts to identify, register, and support IBR owners and operators across North America.

While this filing concludes the FERC-approved [three-year work plan](#), efforts to identify, register and support applicable entities will continue. Details about upcoming outreach, including webinars, Currently Compliant podcast episodes, or Small Group Advisory Sessions, will be included in the Standards, Compliance, and Enforcement Bulletins and on the [IBR Registration Initiative page](#).

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](mailto:beth.smail@rfirst.org).



### **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**

#### **May 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

May 2026 Technical Talk with RF

Monday, May 18, 2026, 2-3:30 p.m. ET

Stay tuned for Webex information to be posted to our website calendar [here](#).

## Agenda

### Oscillations in the power grid

Courtney Fasca, Senior Reliability Consultant, External Affairs; Lew Folkerth, Principal Reliability Consultant, External Affairs; Kellen Phillips, Principal Analyst, Operational Analysis & Awareness; and Parimal Saraf, Principal Engineer, Engineering & System Performance, RF

RF staff will discuss oscillations in the power grid from multiple angles based on each of their expertise, offering a beginner-friendly look at this rising reliability risk with the proliferation of inverter-based resources (IBRs). Learn more about small signal analysis, review real-world case studies, and current actions industry and the ERO Enterprise are taking to mitigate this risk.

### Lessons learned from international case studies

Catherine Lewis, Energy Policy Analyst, External Affairs, RF

Join us for another deep dive into several international case studies — from European blackouts to ongoing fuel crises, Catherine Lewis will recap what led to these events and discuss lessons learned: how to prevent these issues, mitigation strategies being employed, and what we can learn from these cases in the U.S.

## **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**

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**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](mailto: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](mailto: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).<sup>1</sup> 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](mailto:memberservices@eisac.com) with any questions.

<sup>[1]</sup> 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](mailto: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](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.

### Upcoming Standards Subject to Future Enforcement

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
MOD-032-2	Data for Power System Modeling and Analysis	April 1, 2028
CIP-002-8	Cyber Security - BES Cyber System Categorization	July 1, 2028
CIP-003-10	Cyber Security – Security Management Controls	July 1, 2028
CIP-004-8	Cyber Security — Personnel & Training	July 1, 2028
CIP-005-8	Cyber Security — Electronic Security Perimeter(s)	July 1, 2028

CIP-006-7.1	Cyber Security — Physical Security of BES Cyber Systems	July 1, 2028
CIP-007-7.1	Cyber Security — System Security Management	July 1, 2028
CIP-008-7.1	Cyber Security — Incident Reporting and Response Planning	July 1, 2028
CIP-009-7.1	Cyber Security — Recovery Plans for BES Cyber Systems	July 1, 2028
CIP-010-5	Cyber Security — Configuration Change Management and Vulnerability Assessments	July 1, 2028
CIP-011-4.1	Cyber Security — Information Protection	July 1, 2028
CIP-013-3	Cyber Security - Supply Chain Risk Management	July 1, 2028
CIP-015-1	Cyber Security – Internal Network Security Monitoring	Oct. 1, 2028
IRO-010-6	Reliability Coordinator Data and Information Specification and Collection	April 1, 2029
TOP-003-8	Transmission Operator and Balancing Authority Data and Information Specification and Collection	April 1, 2029
CIP-003-11	Cyber Security – Security Management Controls	July 1, 2029

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

### Periodic Data Submittals Due in May 2026

05/30/2026	PRC-004	GO, TO, DP	Protection System Misoperations – Section 1600 data request for Q1-2026 (Jan. 1 – March 31). <b>Submit in MIDAS portal</b>
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### Periodic Data Submittals Due in June 2026 - None