

**RELIABILITY FIRST**

Nov. 5, 2025

To: ReliabilityFirst Compliance Contacts  
Subject: RF Compliance Program Update Letter – November 2025

## **IMPORTANT! System Upgrade Scheduled November 7–10; ERO Portal Outage Expected**

As part of the effort to reduce the risk dependency of hardware failures, NERC will be upgrading systems that support the ERO Portal. To complete the upgrade, the ERO Portal **will be unavailable beginning at 12:00 p.m. Eastern on Friday, November 7, 2025, running through 8:00 a.m. Eastern on Monday, November 10, 2025.** The ERO Portal will be available by 8:00 a.m. Eastern on Monday, November 10, 2025. Thank you for your support in this important technology refresh.

## **NEW! NERC Releases 2026 ERO CMEP Implementation Plan**

The ERO Enterprise Compliance Monitoring and Enforcement Program (CMEP) Implementation Plan (IP) is the annual operating plan used by the ERO Enterprise 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.

The ERO Enterprise is pleased to [release the 2026 CMEP IP](#) describing the risks that will be priorities for the ERO Enterprise's CMEP activities in 2026. NERC and the Regional Entities worked collaboratively throughout the CMEP's development to evaluate reports of NERC committees, ERO Enterprise analysis of events, and NERC reliability assessments to identify the existing and emerging risks that affect the reliable and secure operations of the Bulk Power System.

The 2026 risk elements are similar to the 2025 risk elements, reflecting the maturation of the risk-based approach to compliance monitoring. The changes include elimination of the Incident Response risk element and the addition of a new Grid Transformation risk element. The Grid Transformation risk element addresses the increasing risks associated with the integration of new technologies like Inverter-based resources (IBRs), new large loads, resource adequacy, and the uncertainty surrounding energy policy.

## **NEW! CIP Roadmap Update Industry Webinar – Recording Posted**

[NERC's 2025 Work Plan Priorities](#) include creating a roadmap for ensuring CIP standards provide baseline protection for an evolving risk environment by evaluating the current CIP standards against emerging cyber security and physical security risks (e.g., network intrusion, new registrants, emerging cyber threats, cloud usage, AI or other new technologies) and creating recommendations in the roadmap to address gaps. NERC staff provided an update on the progress of the CIP Roadmap and the next steps during the CIP Roadmap Webinar on October 23, 2025. A recording of the webinar is available [here](#).

## **Reminder! Align Release – Modifications for EOP-012-3 Submittals**

Align Release 7.4.1 successfully deployed on September 27, 2025. This deployment included modifications to Periodic Data Submittals to support the recent FERC Order approving EOP-012-3 effective October 1, 2025. The modifications for this release added EOP-012-3 PDS forms for requirements R6, R7, and R8 as well as an email notification to the CEA when an entity submits a PDS. The Align Release Notes 7.4.1 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 7.4.1, published on September 27, 2025, and can be found on the Align and SEL webpage under the "Release Materials" section. If applicable, EOP-012-3 R8 Generator Cold Weather Constraints are due in Align by 11/14/2025.

## **NEW! Standards Q4 Quarterly Outlook Video Highlights Major Projects**

The Standards Quarterly Outlook, designed to highlight key priorities and upcoming activities in the Standards space each quarter, is part of our ongoing efforts to increase awareness of ongoing projects and the Standards development process.

In the [Q4 2025 edition](#), you'll hear directly from the Standards team about three major projects within the Reliability Standards landscape: Canadian-Specific Revisions to EOP-012-3 – Extreme Cold Weather Preparedness and Operations, CIP-014 – Risk Assessment Refinement, and FERC Order 907.

## **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

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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. **NERC will hold an informational webinar on this NERC Alert on Thursday, November 6, from 2-4 PM EST – Register [at this link](#).**

## **New! Align Deactivating Inactive Accounts in 2026**

Starting in 2026 (possibly 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! NERC Reliability Assessments Evolve with Emerging Risks**

NERC, in collaboration with the Regional Entities (collectively, the ERO Enterprise), is evolving its reliability assessments to ensure they continue to capture important system nuances and insights as the composition and needs of the bulk power system transform. The addition of wide area energy assessments, beginning in 2026, will enable the ERO Enterprise to independently analyze whether resources and transmission can supply both forecasted electrical energy and ancillary services needs over a period of time. Other improvements—such as, scenario-based and essential reliability services analyses—will be rolled out incrementally over the coming years. These evolved reliability assessments will provide a more complete and common picture of the risks around which entities should operationally plan and mitigate. NERC's performance of reliability assessments is a fundamental responsibility in its role as the Electric Reliability Organization (ERO). The [Long-Term Reliability Assessment and seasonal assessments](#) provide invaluable context to industry and policymakers related to the reliable operation of the bulk power system. As part of our efforts to

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inform stakeholders on issues related to the reliability and security of the North American grid, the ERO Enterprise produces [Reliability Insights](#), brief technical documents on critical issues with potential reliability impacts.

## **New! Large Loads Action Plan 2025 Q3 Update**

An increasing number of large commercial and industrial loads are rapidly connecting to the bulk power system. These emerging large loads— data centers (including cryptocurrency and artificial intelligence applications), hydrogen fuel plants, and others—may pose risks to the reliability of the bulk power system. To better understand large loads and identify effective pathways for their integration onto the grid, NERC is implementing an action plan. The [third quarter Large Loads Action Plan update](#) is part of a series of planned efforts to inform, educate, and collaborate with stakeholders on this emerging issue. This update includes information on a recent Level II NERC alert, and details for an upcoming whitepaper and reliability guideline.



## **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@first.org](mailto:beth.smail@first.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, November 17, 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.

### **November 2025 Technical Talk with RF Event Information**

Monday, Nov. 17, 2025, 2:00 | (UTC-04:00) Eastern Time (US & Canada)

Join link:

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=m4735bfd9bd4421b64261ae7722aad646>

Meeting number: 2318 324 0000

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: 231 832 40000

## Agenda

### Supply chain challenges

Jeff CRAIGO, Senior Vice President, Operations and Risk, RF

Eric Seidler, SVP, Corporate Safety, Security and Operational Oversight, Ameren

Jeff CRAIGO and Eric Seidler will discuss the impact of supply chain challenges on electric grid reliability. The Bulk Electric System (BES) is not immune to supply chain risks, which can compromise or impact the availability of equipment, tools, and resources that results in the delay or disruption of system operations.

### CIP standards update

Lew Folkerth, Principal Reliability Consultant, External Affairs, RF

FERC announced action in three areas of the CIP standards in September. Lew will provide a summary of these actions and a discussion of the status of other CIP development efforts.

## **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](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](http://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](http://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
BAL-007-1	Near-term Energy Reliability Assessments   Implementation Plan	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 November 2025

Nov. 29, 2025	PRC-004	GO, TO, DP	Protection System Misoperations - Section 1600 data request for Q3-2025 (July 1 – September 30). <b>Submit in MIDAS portal.</b>
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### Periodic Data Submittals Due in December 2025 -NONE