

**RELIABILITY FIRST**

Oct. 1, 2025

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

**NEW! NERC Reliability Standards Effective October 1, 2025**

- **TOP-002-5** – [Operations Planning](#) | [Implementation Plan](#)
- **EOP-012-3** – [Extreme Cold Weather Preparedness and Operations](#) | [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! Preparing for EOP-012-3**

With FERC approval of EOP-012-3 and its effective date of October 1, 2025, please be aware of the following related items that NERC will be releasing over the next couple weeks. NERC will also send specific announcements for these items as they are available.

- The 2026 Periodic Data Submittal Schedule will include the EOP-012-3 reporting process and be available no later than Wednesday, October 1, 2025.
- Periodic Data Submittals associated with EOP-012-3, specifically Corrective Action Plan extension requests (related to Requirements R6 or R7) and Generator Cold Weather Constraint (related to Requirement R8) submittals will be available within Align by October 1, 2025 (part of the Release 7.4.1 items).
- The EOP-012-3 Reliability Standard Audit Worksheet (RSAW) will be available [here](#) no later than Wednesday, October 1, 2025.
- Additional guidance and best practices for EOP-012-3 Periodic Data Submittals will be provided later in 2025.

**NEW! Changes to the NERC Compliance Registry**

In support of the [Inverter-based Resource Registration Initiative](#), NERC is updating the Generator Owner (GO) and Generator Operator (GOP) functional registration designation in the NERC Compliance Registry (NCR) file. This update is expected to be published on September 18, 2025.

On August 1, 2025, the ERO Enterprise began processing Category 2 GO and GOP requests in CORES. This process will continue through next year with the Category 2 GO and GOP registrations having an effective date of May 15, 2026. As such, entities already registered on the NCR as GOs and GOPs will be automatically redesignated as Category 1 GOs and GOPs. This change does not require any action from currently registered GOs and GOPs. In addition, compliance requirements will not change for currently registered GOs and GOPs when the new Category 1 designation is added. Please note that due to the May 15, 2026 effective date for all Category 2 GO and GOP registrants, the new version of the NCR file will not include columns for these functions until that future date. For reference, the current version of the NCR Active Entities List file can be found on the [NERC Registration page](#). For questions or more information about the IBR Registration Initiative, please visit the [Quick Reference Guide](#) or contact [NERC Registration](#).

## **NEW! 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 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.

## **NEW! NERC Opens Stakeholder Feedback Opportunity for Modernized Website**

Stakeholder input is essential to shaping the future of NERC. NERC launched a [Stakeholder Feedback Opportunity](#), following a public webinar, which will be open through Friday, October 3, for you to share your feedback and make your voice matter. While they are still putting some finishing touches on the website, this is your opportunity to explore the site ahead of launch and provide your feedback and suggestions to help prioritize functionality for the current and future phases. Visit the [NERC.com Modernization Resource Hub](#) for more information.

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

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.



## 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.

**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, October 20**, 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.

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

Monday, Oct. 20, 2025, 2:00 | (UTC-04:00) Eastern Time (US & Canada)

Join link:

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=mbdaeffd5099b7923a6b29e9b4b944678>

Meeting number: 2315 320 2647

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: 231 532 02647

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

### **Agenda:**

#### **How to address the risk of insufficient trained OT cyber security personnel**

Mike Holcomb, Fellow, Director – ICS/OT Cybersecurity, Fluor

The present draft version of NERC's CIP Standards Roadmap identifies the lack of sufficient numbers of trained OT cyber security personnel as a risk. Mike will discuss a potential path forward to train new OT cyber security staff.

#### **ICS security without the guesswork: a risk-first approach**

Stacy Bresler, Managing Partner, Archer Energy Solutions

In the electric sector, ICS security decisions must balance security, safety, and reliability. Yet many programs are shaped by urgency rather than understanding. A high-profile incident, a regulatory pressure point, or a vendor's promise can set priorities without answering the most important question: what is at risk and how do we know? This often leads to investments that look solid on paper but leave critical assets vulnerable in ways that are not immediately obvious.

## **CIP standards update**

Lew Folkerth, Principal Reliability Consultant, External Affairs, RF

FERC announced action in three areas of the CIP standards on Sept. 18. Lew will provide a summary of these actions.

## **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

TOP-002-5	Operations Planning	Oct. 1, 2025
EOP-012-3	Extreme Cold Weather Preparedness and Operations	Oct. 1, 2025
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 October 2025

10/20/2025	FAC-003	GO, TO	FAC-003-5 - Transmission Vegetation Management: Q3, 2025 Vegetation Outage Reporting – <b>Align Data Submittal*</b>
------------	---------	--------	---

**Periodic Data Submittals Due in November 2025**

11/29/2025	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>
------------	---------	------------	--

\*IMPORTANT UPDATE: Please note that starting with the Q3 2025 Submittal, the new RF contact (taking over for Bob Folt) for Periodic Data Submittals and Attestations will be Brandon McCormick. If there are any questions, please reach out directly to Brandon via email at [PDS@rfirst.org](mailto:PDS@rfirst.org) or by phone at 216.218.9413.