

**RELIABILITY FIRST**

Oct. 5, 2026

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

NEW! NERC Reliability Insights Posted

As part of NERC's efforts to inform stakeholders on issues related to the reliability and security of the North American grid, the ERO Enterprise produces *Reliability Insights*. These brief technical documents provide an overview of a topic, identify any critical issues, and potential reliability impacts. We encourage you to read our latest issue: [Large Computational Load Risks Due to Voltage Sensitivity](#).

Learn more about NERC's efforts to understand and address the reliability risks of emerging large loads on the [Large Loads Action Plan initiative page](#). Previous issues are posted in the Newsroom under the [Reliability Insights tab](#).

NEW! NERC Lessons Learned Posted

One new lesson learned has been posted on the NERC website on the [Lessons Learned page](#). The new lesson addresses the following topic:

- [BESS OEM Caused Oscillation](#)

NEW! New Proposed Implementation Guidance

A new proposed Implementation Guidance document for CIP-010-5 R1 (Configuration Change Management) has been posted on the [ERO Enterprise Implementation Guidance web page](#) (please scroll down to the Proposed Implementation Link to review proposed Implementation Guidance documents).

NEW! Retirement of ERO Enterprise CMEP Practice Guide: BCSI

The ERO Enterprise (collectively NERC and Regional Entities) reviewed the ERO Enterprise CMEP Practice Guide: BES Cyber System Information (dated April 26, 2019). In reviewing the Practice Guide, the ERO Enterprise determined it is outdated due to CIP Reliability Standard revisions in CIP-004-7 and CIP-011-3 and no longer needed to provide guidance on retired Standards CIP-004-6 and CIP-011-2 (inactive on December 31, 2023). Revised CIP-004-7 and CIP-011-3 Reliability Standards became effective January 1, 2024, and clarified the CIP requirements related to BES Cyber System Information (BCSI) access, allowing for alternative methods, such as encryption, to be utilized in the protection of BCSI.

On August 28, 2026, NERC requested stakeholder comments concerning the retirement of this guidance by September 14, 2026. No comments were received during this period, and the CMEP Practice Guide is now retired.

REMINDER! PRC-029-1 effective date reached on Oct. 1

Bulk Electric System (BES) Inverter-Based Resources (IBRs) must be design and operation compliant with PRC-029-1 (Frequency and Voltage Ride-through Requirements for Inverter-based Resources) by Oct. 1, 2026. More specifically, based upon commercial operations date, please reference the following breakdown:

- BES IBRs in operation before April 1, 2025:
 - R1-R3 Design and R4 100% of units by Oct. 1, 2026
 - R1-R3 Operation must be met as DME capability becomes available (per the PRC-028 Implementation Plan)
- BES IBRs in operation after April 1, 2025, and on or before July 31, 2026
 - R1-R3 Design and Operation and R4 100% of units by Oct. 1, 2026
- BES IBRs in operation after July 31, 2026
 - R1-R3 Design and Operation and R4 100% compliant on Oct. 1, 2026, or commercial operations date
 - R4 is limited to those units in-service by Oct. 1, 2026.

Note: R4 Hardware exemption submittals (for facilities with a COD prior to the effective date of the standard) are due by Oct. 1, 2027, for BES and non-BES IBRs.

Additionally, NERC released the [ERO Enterprise CMEP Practice Guide: PRC-029-1 Enforcement Discretion](#) (*new version was posted by NERC on 9/10/26*) and [Enforcement Discretion Tracker](#). The purpose of this CMEP Practice Guide is to provide guidance to CMEP staff regarding the use of enforcement discretion for potential noncompliance with the design aspects of PRC-029-1 Requirements R1, R2, and R3 (Frequency and Voltage Ride-through Requirements for Inverter-based Generating Resources). Due to industry-wide constraints on qualified Inverter-Based Resource (IBR) original equipment manufacturers (OEMs) and vendors, some Generator Owners may be unable to complete the design implementation activities associated with Requirements R1 through R3 by the applicable compliance dates of October 1, 2026, for Bulk Electric System (BES) IBRs and January 1, 2027, for non-BES IBRs. For any questions or further guidance regarding this Practice Guide or completing the Enforcement Discretion Tracker, please contact EnforcementCU@first.org.

REMINDER! NERC Announcement – Registration open for CIP Virtualization Standards Small Group Advisory Session

NERC, in collaboration with the Regional Entities, will host a Small Group Advisory Session (SGAS) for registered entities to discuss the revised CIP Standard Requirements and modified definitions addressing virtualization developed in Standard Drafting Project 2016-02. In addition to reviewing the changes to CIP Reliability Standards with mandatory compliance dates in 2028, the SGAS will also discuss early adoption, “per system capability” reporting, and industry questions.

The SGAS will consist of two parts:

1. **General Session Live Webinar** – A general session will be held to discuss revisions of the NERC CIP Reliability Standards addressing virtualization. **The general session will be held on Monday, December 7, 2026, from 1:00–3:00 p.m. Eastern.** Registration for a one-on-one session is not necessary to participate in this general session. Register at this [link](#).
2. **SGAS One-on-One Sessions** – Closed, one-on-one discussions between a registered entity and ERO Enterprise (collectively NERC and Regional Entities) staff about issues pertinent to their compliance with the CIP Reliability Standards for virtualization. These sessions will occur between Tuesday, December 8, 2026 – Friday, December 11, 2026 and will be conducted virtually using Teams. **NERC will schedule the one-on-one sessions after registration is received and is coordinated with Regional Entity staff.** Please use the [link](#) to submit your request for a one-on-one session. Registration is free and is required **by **close of business, October 5, 2026**.**

Request for questions – To provide as much benefit as possible and address topics of concern from industry during the general session, **NERC is requesting industry submit any questions they may have relevant to the revised CIP Reliability Standards by **October 5, 2026**.** Please use the [link](#) to submit your questions, contact information, and categorization of questions (specific to CIP Standard or Requirement, Early Adoption/Implementation Plan, Per System Capability, Other). Multiple questions can be submitted in one request.

REMINDER! MSPP implementation update: NERC to open formal comment period

As part of the implementation phase of the [Modernization of Standards Processes and Procedures Initiative](#), NERC will open two 60-day formal comment periods, one on proposed revisions to the Rules of Procedure (ROP) and one on proposed revisions to the Standard Processes Manual (SPM). The comment periods will run through October 26. Revised drafts of the standing committee charters and the Reliability Issues Steering Committee's Reliability Standard Development Subcommittee scope document will be provided as supporting documents. A ballot period will also occur for revisions to the SPM.

Comments on the ROP and standing committee governance documents revisions are open to all stakeholders, and comments on the SPM are open to Registered Ballot Body (RBB) members, proxies, and contributors. **To vote on proposed SPM changes, you must first join the ballot pool by October 9.** The ballot pool will be open from **August 26–October 9**. Voting will be held from **October 16–26**.



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.**



REMINDER! Monthly Technical Talk with RF

Tech Talk with RF is back in October and we're focusing on cyber security for Cyber Security Awareness Month.

Event Information

October 2026 Technical Talk with RF
Monday, Oct. 26, 2026, 2 p.m. ET

Join link:

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=ma48253b8833db30b226cffdef88ceefd>

Meeting number: 2310 065 4509

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: 231 006 54509

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

Agenda

Supply chain bulk power system impacts from Executive Order 14421

Patrick Miller, President and CEO, Ampyx Cyber

Executive Order 14421 introduces a new layer of supply chain risk considerations for the bulk power system, extending beyond traditional NERC CIP Reliability Standard boundaries. Patrick Miller will discuss what has changed, where the requirements may overlap or diverge, and what utilities should be watching as implementation takes shape.

How Cyber Decoys can strengthen detection and response

Ron Ross, Senior Reliability Consultant, and David Sopata, Principal Reliability Consultant, Entity Engagement, RF

Ron Ross and David Sopata will discuss the concept of Cyber Decoys from CISA and how they could potentially be used to enhance cyber security detection and response capabilities. They will outline how they are commonly used and how they may or may not fit into an organization's CIP program and/or CIP-015 (Cyber Security – Internal Network Security Monitoring) strategy.

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

BAL-007-1.1	Near-term Energy Reliability Assessments	April 1, 2027
EOP-004-5	Event Reporting	Oct. 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
CIP-014-4	Physical Security	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

CIP-015-2	Cyber Security – Internal Network Security Monitoring	Oct. 1, 2029
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Please refer to the [U.S. Effective Dates](#) page on the NERC website for additional detail.

Periodic Data Submittals Due in October 2026

10/20/2026	FAC-003	GO, TO	FAC-003-5 - Transmission Vegetation Management: Q3, 2025 Vegetation Outage Reporting – Align Data Submittal
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Periodic Data Submittals Due in November 2026

11/29/2026	PRC-004	GO, TO, DP	Protection System Misoperations - Section 1600 data request for Q3-2026 (July 1 – September 30). Submit in MIDAS portal
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If you experience any issues with your data submittals, please contact PDS@rfirst.org.