Sept. 2, 2025

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

2025 Fall Reliability & Security Summit

ReliabilityFirst is hosting its annual Fall Reliability & Security Summit at the MGM National Harbor, just outside of Washington, D.C., this year.

We'll kick things off with an evening reception and our Reliability Recognition Awards Ceremony on Monday, Sept. 8, followed by an exciting agenda on Tuesday, Sept. 9. We'll be joined by key players across the electric industry, including executives from FERC, NERC, AEP, LS Power, PPL Electric Utilities, Electric Power Supply Association, for a panel discussion as well as presentations on FERC Orders, RF Compliance and Enforcement, and more.

Then on Wednesday, Sept. 10, attendees will be able to choose from three half-day tracks, depending on which focus area makes the most sense for them. These include an energy policy leadership session, an internal controls-focused track for experienced registered entity personnel, and a NERC 101 primer for new registered entities.

To view the full agenda, please visit the RF website. *Registration is now closed*.

We hope to see you next week!

NEW! NERC Modernization of Standards Processes and Procedures Task Force Update

The Modernization of Standards Processes and Procedures Task Force (MSPPTF) has posted stakeholder questions and answers arising from the recent virtual Q&A sessions. The webinars were held to provide useful context to facilitate stakeholders' responses to the white paper on potential improvement opportunities for transforming how NERC develops its Reliability Standards. Each webinar was dedicated to one of the three process steps: standards initiation, standards development, and balloting. MSPPTF materials, including recordings of each of the three webinars, are posted and frequently updated, on the MSPPTF webpage.

NEW! NERC Cold Weather Preparedness Small Group Advisory Session

The presentation and recording from the August 18, 2025, Cold Weather Preparedness Small Group Advisory General Session are now available.

NEW! 2025 ERO Reliability Risk Priorities Report

The NERC Board of Trustees accepted the 2025 ERO Reliability Risk Priorities Report (2025 RISC Report) during their August meeting. The primary goals of the 2025 RISC Report are to identify key risks to the bulk power system (BPS) that require attention and to recommend actions to mitigate these risks. This report distinguishes itself from other NERC publications by providing strategic guidance on both current and emerging risks, along with suggested mitigation strategies. View the report here.

NEW! NERC Wildfire Mitigation Reference Guide

An updated NERC Wildfire Mitigation Reference Guide has been posted on the NERC website. This reference guide is to provide awareness on work being performed across industry to reduce the risk of wildfires started by utility electrical lines and equipment.

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@rfirst.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.

Level 2 NERC Alert: Cross-Border Remote Access to Bulk Power System Elements

Responses to the questions included in the NERC Alert are required to be submitted via the NERC Alert System by Sept. 15, 2025, 12 a.m. ET.

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

There will be no Monthly Technical Talk with RF in September. Please join us for our next Tech Talk on Monday, Oct. 13.

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. Alternately, 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		
TOP-002-5	Operations Planning	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
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 September 2025 - NONE			

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 **– Align Data Submittal***

*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 or by phone at 216.218.9413.