



## CERTIFICATION REMINDER

***Reminder to certified Transmission Operators (TOP), Balancing Authorities (BA), and Reliability Coordinators (RC) (including entities taking on certain standard obligation per an agreement with a certified entity) of the need to contact your Regional Entity of operational changes as described in this letter.***

Dear Primary Compliance Contact,

This reminder is to ensure entities registered as a Balancing Authority (BA), Reliability Coordinator (RC), and/or Transmission Operator (TOP) are aware of the Organization Certification Review and Readiness Evaluation processes. Readiness Evaluations may be required for entities taking on responsibilities for certified entities (e.g. Transmission Owners (TO-LCCs) in the PJM footprint).

[Sec. 500, Appendix 5A, Sec. V](#) of the NERC Rules of Procedure governs Certification Reviews. Readiness Evaluations are also governed by Appendix 5A Sec. V, which states *“Each entity that has taken responsibility for Reliability Standards and/or Requirements/sub-Requirements applicable to the certifiable functions by virtue of being a member of a JRO, CFR, or other agreement shall be the entity NERC certifies to operate their portion of the RC, TOP, or BA Area(s).”*

The decision to certify and evaluate changes to an already operating and certified registered entity is a collaborative decision between the affected Regional Entity and NERC. NERC has the final authority regarding this decision. Items that are to be considered in this decision include one or more of the following:

- Changes to registered entity’s footprint (including de-certification changes to existing JRO/CFR assignments or sub-set list of requirements):
  - The review of changes to an already registered and operational entity’s footprint<sup>1</sup> is primarily concerned with ensuring the gaining functional entity has the tools, training, and security in place to reliably operate with new responsibilities. Changes to an entity’s footprint can be characterized by new metered boundaries associated with the integration or dis-association of existing electrical areas of the BPS (Reliability Coordinator Area, Transmission Operator Area, or Balancing Authority Area).
- Relocation of the Control Center:
  - Fundamental to the reliable operation of the interconnected transmission network are the control centers that continuously monitor, assess, and control the generation and transmission power flows on the BES. Of interest are impacts to the

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<sup>1</sup> This includes changes in ownership of BES Facilities, changes in the applicability of the BES Definition to a Facility, and newly installed BES Facilities.



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functionality provided within these facilities for continued reliable operations of the BES that affect:

- Tools and applications that System Operators use for situational awareness of the BES
- Data exchange capabilities
- Interpersonal (and alternate) communications capabilities
- Power source(s)
- Physical and cyber security
- The impact of the relocation of the Control Center on the entity's ability to perform the functions for which the entity is registered under normal and emergency conditions should be explored and documented to understand the manner in which the Control Center continues to support the reliable operations of the BES.
- Modification of the Energy Management System (EMS) which is expected to materially affect CIP security perimeters or the System Operator's: 1) situational awareness tools, 2) functionality, or 3) machine interfaces.

Certification documents and more information are located [here](#) on ReliabilityFirst's website. If you are planning a change that falls into one of the above categories, or even if you are not sure your change does fall into one of these categories, an Organizational Certification Review, Readiness Evaluation, or even some other lesser certification activity may need to be performed. To start the process, please complete the "RF Certification Notification and Preliminary Questionnaire" ([direct link to form](#)).

To allow for time in scheduling, it is requested, if possible, that you **provide 12 months advance notice** of your changes to allow sufficient time for ReliabilityFirst to review the changes and begin the process.

Please let us know if you have any questions regarding this topic.

Sincerely,

*Brian Thiry*

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