



RELIABILITY FIRST

May 1, 2024

To: ReliabilityFirst Compliance Contacts
 Subject: RF Compliance Program Update Letter – May 2024

NERC
 NORTH AMERICAN ELECTRIC
 RELIABILITY CORPORATION



NEW! IBR Registration Initiative – Q1 2024 Update

NERC published its first quarterly [update](#) for the IBR Registration Initiative to the NERC website on April 3. This issue outlined the many different activities associated with this important initiative and provided status updates related to the proposed revisions to the NERC Rules of Procedures (RoP), registration of IBRs, Stakeholder outreach, Standards, and provided links to valuable resources about inverter-based resources.

The ERO Enterprise has already begun identifying potential registration candidates based on Energy Information Administration (EIA) 860 data, the NERC Compliance Registry (NCR), and information gathered from industry stakeholders. NERC and the regions plan to focus more on specific outreach and education during the second phase of the work plan implementation to ensure unregistered entities are aware of the new criteria.

IBR Registration Milestones

Phase 1: May 2023–May 2024

- Complete Rules of Procedure revisions and approvals
- Commence Category 2 GO and GOP candidate outreach and education (e.g., through trade organizations)

Phase 2: May 2024–May 2025

- Complete identification of Category 2 GO and GOP candidates
- Continue Category 2 GO and GOP candidate outreach and education (e.g., quarterly updates, webinars, workshops, etc.)

Phase 3: May 2025–May 2026

- Complete registration of Category 2 GO and GOP candidates thereafter subject to applicable NERC Reliability Standards
- Conduct specific Category 2 GO and GOP outreach and education (e.g., quarterly updates, webinars, workshops, etc.)

NEW! NERC Issues NERC Alert to Industry

On April 23, NERC issued a [Level 2 Alert 6 GHZ Communication Penetration in the Electric Industry](#) to Distribution Provider (DP), Distribution Provider UFLS-Only (DP-UFLS), Generator Owner (GO), and Transmission Owner (TO). The alert includes a series of questions, that are intended to determine an initial extent of condition in assessing the depth of reliance on 6 GHz communications technology and the potential severity of interference. NERC registered entities should note that only entities registered as the above mentioned will be able to view and respond to the alert in the NERC Alert System. However, the alert is [public](#) and may be viewed at the link above. The alert has a response due date of July 8, 2024.

Inquiries regarding the subject matter of this industry advisory should be directed to: NERC Alerts at nerc.alert@nerc.net.



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 each Primary Compliance Contact (PCC), Primary Compliance Officer (PCO) and Alternate Compliance Contact (ACC) in the ERO Portal/CORES system.**

Register Now! RF Fall Reliability and Security Summit, Sept. 16-18

Formerly known as the Fall Workshop, this year's Fall Reliability and Security Summit will take place **Sept. 16-18** at the vibrant Conrad Indianapolis (50 West Washington Street, Indianapolis, IN 46204). We'll dive into the intersection of energy policy with reliability and security, with speakers from state government, industry, academia and ReliabilityFirst. We will start with our annual Awards Ceremony on Monday night, followed by a full day of panels and presentations on Tuesday.

Wednesday morning will include additional presentations, concluding with industry committee meetings. We hope to see you there!

The full agenda for the workshop will be posted on the RF website when available. Breakfast and lunch will be available each day of the workshop.

[Click here](#) to register.



Monthly Technical Talk with RF Call

The next Tech Talk with RF will be held on **Monday, May 20**, from 2 to 3:30 p.m. EST.

May 2024 Technical Talk with RF

Monday, May 20, 2024, 2:00 PM | (UTC-05:00) Eastern Time (US & Canada)

Join link: <https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=mcf995871f03c0575782f4360f1e8298c>

Meeting Number: 2310 618 4461

Meeting Password: 0123456

Join by phone: 1-650-479-3207 Call-in toll number (US/Canada)

Access Code: 2310 618 4461

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

Agenda Topics

Generator Owner and Generator Operator risks to the grid, standards and mitigations

Shon Austin, Principal Technical Auditor, CIP Compliance Monitoring

Ash Chappell, Senior Technical Auditor, Operations & Planning Compliance Monitoring

- Shon and Ash will do a deep dive on Generator Owners (GOs) and Generator Operators (GOPs). They will discuss their risks to the grid, whether related to planning and modeling, the changing resource mix (including inverter-based resources), and/or cyber and physical security.
- They will cover the applicable standards, including some notable problem areas as well as where entities can find guidance and implementation plans.

- They will also highlight where GOs and GOPs can get help with these challenges, including RF's Assist Visit program and the NERC website.

Internal controls best practices

Jason Smith, Director, NERC Compliance Office, DTE Energy

Chris Plensdorf, Manager of NERC CIP Compliance, DTE Energy

Jeff Wallace, NERC Compliance Process Management Specialist, DTE Energy

- DTE Energy will discuss internal controls best practices for GOs and GOPs.

NEW! 2024 RF Protection System and Human Performance Workshops

Registration is now open for the RF 2024 Protection System and Human Performance Workshops on Aug. 8, 2024! These events will be held virtually via WebEx. There is no charge to attend these events and both events are open to anyone who would like to attend. Please forward this notice along to anyone who may be interested. Agendas and additional information are currently being developed and will be available soon.

10th Annual Protection System Workshop for Technical Personnel - [Register Now](#)

Aug. 7, 2024 | 9:00 a.m. – 1:00 p.m. Eastern

This workshop will cover a diverse range of topics and discussions relative to Protection Systems tailored to the needs of substation and transmission maintenance personnel; protection and controls experts; operations control room staff, including tools support personnel for EMS and SCADA; and asset design groups (substation and transmission). It will include speakers from RF, industry subject matter experts, and others.

7th Annual Human Performance Workshop - [Register Now](#)

Aug. 8, 2024 | 9:00 a.m. – 1:00 p.m. Eastern

This workshop will focus on practical application of human performance techniques and concepts for front-line activities that attendees can retain and use in transmission reliability related work areas such as operations, asset management, design, protection, maintenance, and others. The ideas, suggestions and stories shared during this highly interactive, free event are especially relevant for human resources professionals; asset management groups; internal control champions and specialists; company trainers; and leadership and others interested in these topics.

Important! NERC Registration Information

New! Revised ERO Enterprise GO GOP Asset Verification Form

In November 2023, NERC redesigned and implemented a new GO GOP Asset Verification Form used by our registered Generator Owners and Operators to manage the generating assets within their portfolio. At that time, we asked entities to change over to or start using the new form when changes are next made to their registrations. The time has now come for all active GO and GOPs who have not yet made the switchover to the newform to complete and submit a new revised GO GOP Asset Verification Form into CORES. If your entity is registered in multiple regions, you may now add the generating assets to the same form for ALL regions. This eliminates the need to maintain separate forms for each region. Please use the attached ERO Enterprise GO GOP Asset Verification Form template to complete this switchover. This is the same template that is being used by all regions across the ERO. RF asks that entities complete this change by June 30 (if not already done so).

NEW! Check out the improved RF Registration [web page](#) on the RF public website

The new RF Organization Registration web page provides an overview of key concepts, processes, North American Electric Reliability Corporation (NERC) resources, and contact information in support of entity functional registration. This web page is designed to be a one-stop-shop location for everything related to Organization Registration. Whether an entity is new to NERC registration or a registered entity that has been in operation and registered for years, there is valuable information available here for everyone.

Registration is defined by the NERC Organization Registration program in Section 500 of the [NERC Rules of Procedure](#), and the Organization Registration Manual and Statement of Compliance Registry Criteria can be found in the NERC Rules of Procedure Appendices 5A and 5B.

For questions about the registration process within the ReliabilityFirst region, or to register an entity on the NERC Compliance Registry, please submit requests to compliance@rfirst.org.

Information provided in the RF Organization Registration web page includes:

- NERC ERO Enterprise 101 Information Package
 - ERO Enterprise Onboarding Checklist for new registered entities
 - **New!** ERO Enterprise GO GOP Asset Verification Form
 - RF ERO Registration Form
-

- RF Organization Registration procedure
- Overview of Entity Registration process
- Registered Entity Contact maintenance process
- JRO and CFR registration guidance
- BES Definition and Implementation guidance
- Links to NERC resources about registration

Notification of Additional Changes in 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 be liable 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 Bob Folt, Principal Analyst, RAM and NERC Registration, with any questions at bob.folt@first.org.

Register for E-ISAC Membership

As a registered entity, it is important, and expected, that you will join the Electricity Information Sharing and Analysis Center (E-ISAC). E-ISAC membership is available to North American asset owners and operators (AOOs) and select partner organizations, and there is no cost to join. The E-ISAC encourages security individuals with cyber, physical, or operational technology security responsibilities to apply for membership.

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.

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.



NEW! Align Release Notes 6.1.0 Posted

During the recent April 20, 2024, maintenance outage, the Align system deployed modifications to correct existing functionality or to improve user experience. The modifications include, but are not limited to, the following: corrections to the SEL Reference IDs generated in Align forms; updates for ERP Questionnaires (specific to NERC administration); fixes for filtering and sorting throughout all modules; corrections to the RFI recipient lists and updates to the emails related to RFIs issue from Enforcement, Mitigation, Periodic Data Submittals, Self-Certification, and Technical Feasibility Exceptions. The Align Release Notes 6.1.0 provide the specific changes deployed and indicate the users affected, as well as if any training materials need to be modified. These details are documented in the Align Release Notes 6.1.0, published on April 20, 2024, and can be found on the Align and SEL webpage under the Release Materials section.

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.

NERC 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 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.

2024 Upcoming Standards Subject to Future Enforcement

EOP-012-1	Extreme Cold Weather Preparedness and Operations (Requirements 1–2 effective 4/1/28; Requirement 4 effective 10/1/29) Note: In accordance with FERC's February 2023 approval order, NERC submitted a revised implementation plan for the EOP-012 standard on February 16, 2024, and it is pending FERC approval.	Oct. 1, 2024
-----------	--	--------------

2025 Upcoming Standards Subject to Future Enforcement

IRO-010-5	Reliability Coordinator Data and information Specification and Collection Implementation Plan TOP-003-6.1 – Transmission	July 1, 2025
-----------	--	--------------

	Operator and Balancing Authority Data and Information Specification and Collection Implementation Plan	
TOP-003-6.1	Transmission Operator and Balancing Authority Data and Information Specification and Collection Implementation Plan	July 1, 2025
TOP-002-5	Operations Planning	Oct. 1, 2025

Please refer to the [U.S. Effective Dates](#) page on the NERC website for additional detail.

Periodic Data Submittals Due in May 2024

5/30/2024	PRC-004	GO, TO, DP	Protection System Misoperations - Section 1600 data request for Q1-2024 (Jan. 1 – Mar. 31). Submit in MIDAS portal.
-----------	---------	------------	---

Periodic Data Submittals Due in June 2024 - NONE