

**RELIABILITY FIRST**

July 1, 2025

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

NEW! NERC Reliability Standards Effective July 1, 2025

- **IRO-010-5** - Reliability Coordinator 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
- **TOP-003-6.1** - Transmission Operator and Balancing Authority Data and Information Specification and Collection | 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! ERO Enterprise Webinar: Registration Process for Category 2 Generator Owner and Generator Operator Inverter-Based Resources

On July 14, 2025, NERC will host an informational webinar on the Registration Process for Category 2 Generator Owner (GO) and Generator Operator (GOP) Inverter-Based Resources (IBRs). This webinar will introduce the registration process for owners and operators of non-Bulk Electric System IBRs with aggregate nameplate capacity ≥ 20 MVA connected at a voltage ≥ 60 kV that are required to register with NERC and adhere to its Reliability Standards. NERC has developed a process to register these Category 2 GOs and GOPs by May 15, 2026.

Webinar Agenda:

- IBR Initiative Milestones and Work Plan Overview
- Overview of the [Electricity Information Sharing Analysis Center](#) (E-ISAC)

- Registration process for Category 2 GOs and GOPs
- Centralized Organization Registration ERO System (CORES) new functionality

The webinar will include a question-and-answer session. Please direct webinar registration questions to [Tiffany Washington](#).

Register: <https://nerc.webex.com/weblink/register/re9bfece342082272f7980a7437ff908a>



NEW! CIP Low Impact Workshop

The RF Low Impact Workshop will give attendees the opportunity to improve their understanding of security and compliance for CIP assets containing low impact BES Cyber Systems. Attendees will be able to choose from three training tracks on Day 1. Day 2 will be a workshop with presentations and panels on various topics of interest to the CIP low impact community. The full agenda is available on [our website](#). For questions regarding the workshop, please email: low_impact_workshop@rfirst.org

[Click here to register](#)

NEW! Cold Weather Preparedness Small Group Advisory Sessions to be held in August

NERC and the Regional Entities, including ReliabilityFirst, will host Small Group Advisory Sessions (SGAS) to discuss the implementation of the Extreme Cold Weather Preparedness Standard, EOP-

012-3. While this standard is still awaiting final FERC approval after it was filed with the commission in April, it has a proposed effective date of Oct. 1, 2025.

These meetings are tentatively planned for the week of **Aug. 18, 2025**, and will be held virtually via Webex. There will be a general session to discuss EOP-012-3 on Monday, Aug. 18. Then, SGAS One-on-One Sessions are planned for Tuesday, Aug. 19 - Friday, Aug. 22. These sessions will be closed, one-on-one discussions between a registered entity's Subject Matter Experts (SMEs) and ERO Enterprise staff about issues pertinent to that entity's implementation of EOP-012-3 and any other cold weather-related concerns.

NERC will schedule the one-on-one sessions after registration is received and is coordinated with Regional Entity staff.

[Click here to read more](#)



NEW! 2025 Fall Reliability & Security Summit

Join ReliabilityFirst at our annual Fall Reliability & Security Summit, hosted this year at the MGM National Harbor just outside of Washington, D.C.

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, PJM, AEP, LS Power, and more 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 workshop for experienced registered entity personnel, and a NERC 101 primer for new registered entities.

[Click here to register](#)

2025 RF Protection System and Human Performance Workshops

Register now for the upcoming ReliabilityFirst Protection System and Human Performance Workshops. These events will be held virtually via WebEx. The agenda for each workshop is posted to our website. If you have any questions, please contact [John Idzior](#) or [Thomas Teafatiller](#).

Protection System Workshop – [Webpage with agenda and registration](#)

Aug. 6, 2025 | 9 a.m. - 1 p.m. Eastern

Human Performance Workshop – [Webpage with agenda and registration](#)

Aug. 7, 2025 | 9 a.m. - 1 p.m. Eastern



CATEGORY 2 GENERATOR OWNER and GENERATOR OPERATOR NON-BES IBR UPDATE

Phase 2 of the IBR Registration Initiative has concluded, and RF Registration has completed its identification of Category 2 Generator Owners (GOs) and Generator Operators (GOPs) as candidates for registration.

Phase 3 has started with RF Registration currently collecting and reviewing registration documentation received from the entities in final preparation for registrations to begin.

Phase 3 involves the evaluation of the following documentation, as for any GO and/or GOP registration, to validate the registration candidacy:

- 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.

IBR CORES UPDATE - NERC is working on updating the Centralized Organization Registration ERO System (CORES) to accommodate registered entities and soon-to-be registered entity's ability to designate the appropriate Category 2 GO and/or GOP Registrations. More information to follow.

If you have any questions or require further clarification regarding your respective registration(s) or the process, please email RF Registration at compliance@rfirst.org.



Level 3 NERC Alert issued for Essential Actions for Inverter-Based Resource (IBR) Performance and Modeling

NERC has issued a *Level 3 Alert: Essential Actions for Inverter-Based Resource (IBR)[1] Performance and Modeling* to Transmission Owners (TO), Transmission Planners (TP), Planning Coordinators (PC), and currently registered Generator Owners (GO) to enhance technical minimum requirements and study processes to mitigate risks posed by IBR performance during system disturbances.

Initial acknowledgement of receipt was required from the Registered Entities by May 27, 2025, 12 a.m. ET via the NERC Alert System. Any registered entities who have not yet acknowledged receipt of the NERC Alert are encouraged to do so as soon as possible. **Responses to the questions included in the NERC Alert are required to be submitted via the NERC Alert System by Aug. 18, 2025, 12 a.m. ET.**

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, July 21, 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.

July 2025 Technical Talk with RF Event Information

Monday, July 21, 2025, 2:00 PM | (UTC-04:00) Eastern Time (US & Canada)

Join link:

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=m0a185e8a9d7e8b11845df72a43c3c76c>

Meeting number: 2306 095 8550

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: 230 609 58550

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

Agenda:

Winterization site visit best practices and lessons learned

Hamilton Liberty Power Plant

Representatives from Hamilton Liberty Power Plant, located in northeastern Pennsylvania, will share their experience with RF's power plant winterization site visit program, including best practices for winterization.

NERC Modernization of Standards Processes and Procedures

Matt Holtz, Vice President, Transmission Operations, Invenergy

Matt Holtz, who serves on the NERC Modernization of Standards Processes and Procedures Task Force (MSPPTF), will provide an overview of this new initiative. The MSPPTF will develop recommendations to transform and modernize the current processes and procedures for standards development to improve both effectiveness and efficiency, from risk identification and prioritization to implementation.

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 Bob Folt, Principal Analyst, RAM and NERC Registration, with any questions at bob.folt@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 the 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

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

Periodic Data Submittals Due in July 2025

07/21/2025	FAC-003-5	GO, TO	FAC-003-5 - Transmission Vegetation Management: Q2, 2025 Vegetation Outage Reporting – Align Data Submittal
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Periodic Data Submittals Due in August 2025

08/29/2025	PRC-004	GO, TO, DP	Protection System Misoperations – Section 1600 data request for Q2-2025 (April 1 – June 30). Submit in MIDAS portal.
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