Northeast Power Coordinating Council, Inc. (NPCC)

2026 Business Plan and Budget

Draft #1

Public

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Introduction

Organizational Overview

Northeast Power Coordinating Council, Inc. (NPCC) is a not-for-profit corporation responsible for promoting and improving the reliability of the international, interconnected bulk power systems in Northeastern North America through (i) the development of Regional Reliability Standards and compliance assessment and enforcement of continent-wide and Regional Reliability Standards, (ii) coordination of system planning, design and operations, and assessment of reliability (collectively, Regional Entity activities), and (iii) the establishment of Regionally-specific criteria, and monitoring and enforcement of compliance with such criteria (collectively, Criteria Services activities). NPCC provides the functions and services for Northeastern North America of a cross-border Regional Entity through a Regional Entity division, as well as regionally-specific Criteria Services for Northeastern North America through a Criteria Services division.

The NPCC Region covers nearly 1.2 million square miles and is populated by more than 58 million people. NPCC includes seven states (Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont) and four Canadian provinces (New Brunswick, Nova Scotia, Ontario, and Québec). From a net energy for load perspective, NPCC is approximately 43% U.S. and 57% Canadian; while approximately 65% of Canadian net energy for load is within the NPCC Region.

Membership and Governance

Members

Membership with NPCC is open, voluntary, and free of charge. NPCC has two classes of members, General Members and Full Members. Each Member belongs to one of seven industry sectors:

Sector 1) Transmission Owners
Sector 2) Reliability Coordinators
Sector 3) Transmission Dependent Utilities, Distribution Companies, Load Serving Entities
Sector 4) Generator Owners
Sector 5) Marketers, Brokers, and Aggregators
Sector 6) State and Provincial Regulatory and/or Governmental Authorities
Sector 7) Sub-Regional Reliability Councils, Customers, Other Regional Entities, and Interested Entities

Members meet at least annually to elect the Independent Directors and Stakeholder Directors and to conduct other business as may come before the meeting. Additionally, members approve amendments to the NPCC Amended and Restated Bylaws as recommended by the NPCC Board of Directors. Full Members of NPCC are subject to compliance with regionally-specific more stringent reliability criteria that are associated with bulk power system design, planning, operations, and maintenance. Organizations such as independent system operators (ISOs), regional transmission organizations (RTOs), transmission companies, entities that perform the Balancing Authority (BA) function, and state or sub-regional reliability councils are expected to be Full Members.

NPCC has three Member committees, the Reliability Coordinating Committee, the Compliance Committee, and the Reliability Standards Committee. It also has five Member task forces that report to the Reliability Coordinating Committee: the Task Force on Coordination of Operations, the Task Force on the Coordination of Planning, the Task Force on Infrastructure Security and Technology, the Task Force on System Protection, and the Task Force on System Studies. NPCC has various Member working groups that report to either a Task Force or Committee.

Board of Directors

NPCC is governed by a hybrid Board of Directors consisting of two directors from each of the seven member voting sectors, an independent sector consisting of two independent directors, and an independent Board Chair with voting rights to preclude board deadlocks, and the President and CEO. On February 25, 2025, NPCC filed amendments to its Bylaws that would permit up to five independent directors, including the Board Chair. No two sectors can control and no one sector can block action.

There are four Board committees that advise the Board of Directors on finance, retirement, governance, compensation, and human resource matters consistent with their approved charters.

- Finance and Audit Committee (FAC)
- Pension Committee (PC)
- Corporate Governance and Nominating Committee (CGNC)
- Management Development and Compensation Committee (MDCC)

The Amended and Restated Bylaws establish NPCC's independence from users, owners, and operators of the bulk power system through the enhanced governance structure while providing fair stakeholder representation in the election of the Board of Directors and officers. The

2026 Business Plan and Budget

members, from each of the seven stakeholder voting sectors, vote to elect directors in their respective sector. The Amended and Restated Bylaws establish criteria for board service for both stakeholder and independent directors. Independent Directors are drawn from diverse backgrounds and possess a broad range of industry expertise, perspectives, experiences, skill sets and knowledge to contribute to the effective functioning of a hybrid board structure.

Regional Entity Division Functional Scope

NPCC performs the following functions to further its mission and in accordance with its Federal Energy Regulatory Commission (FERC) approved Amended and Restated Regional Delegation Agreement between the North American Electric Reliability Corporation (NERC) and NPCC (Delegation Agreement) and with various individual Memorandum of Understanding or Agreements with Canadian regulatory authorities in New Brunswick, Nova Scotia, Ontario, and Québec:

- Active participation in the development and revision of North American Reliability Standards, and as needed development of Regional Reliability Standards and Variances applicable within the NPCC footprint.
- Monitoring and enforcement of approved Reliability Standards, including the registration of responsible entities, and as needed certification of such entities.
- Assessment of the present and future reliability, resiliency, security, and risks of the Bulk Power System (BPS).
- Promoting operational coordination, situational awareness, and the protection of critical infrastructure.
- Event analysis and identification of lessons learned to enhance reliability.
- Providing and coordinating training, education, and outreach to stakeholders in support of delegated-related functions.
- Participating in reliability and security activities that enhance resilience of the BPS.

The ERO Enterprise

Electricity is a vital component of the fabric of modern society and the Electric Reliability Organization (ERO) Enterprise serves to strengthen that fabric for the benefit of nearly 400 million North Americans. The ERO Enterprise, which consists of the North American Electric Reliability Corporation (NERC) and the six Regional Entities, works with users, owners, and operators of the bulk power system (BPS), government partners, and other stakeholders and industry participants, to pursue its mission of assuring the effective and efficient reduction of risks to the reliability and security of the BPS.

NERC and the Regional Entities play different, but important and complementary, roles in delivering ERO Enterprise programs. NERC provides industry-wide perspective and oversight, and the Regional Entities have unique features and activities that serve the needs of their regional constituents, while ensuring that registered entities follow NERC and Regional Reliability Standards. The ERO Enterprise is explicitly committed to its collective success in achieving its vision of a highly reliable and secure North American BPS.



ERO Enterprise Strategic and Operational Planning

NERC and the Regional Entities are continually refining their individual and collective operating and governance practices in support of strategic and operational goals and objectives that are designed to ensure the ERO fulfills its statutory obligations. This collaboration is done while acknowledging the unique differences across the Regional Entities, and the different corporate and governance responsibilities of each entity.

In 2024, the ERO Enterprise revised the <u>ERO Enterprise Long-Term Strategy</u>. This strategy includes the following focus areas for achieving success in its vision and mission:

- **Energy** Effectively leverage a broad range of data, tools, and approaches to assist stakeholders and policymakers in addressing existing BPS risks and proactively identifying and preparing for emerging and unknown risks to the grid.
- Security Maintain cyber and physical security programs (E-ISAC, Standards, Compliance Monitoring and Enforcement Program (CMEP), technical committee work,¹ outreach and engagement) that are risk-based, efficient, coordinated, and effectively advance the security posture of industry.
- **Engagement** Ensure that the increasingly diverse spectrum of stakeholders and policymakers find value in engagements with the ERO Enterprise, seek ERO Enterprise expertise to inform their decision-making, and have confidence in the integrity and independence of ERO Enterprise programs.
- Agility and Sustainability Perform as an effective and efficient team acting in coordination, ensuring its programs and efforts deliver value for stakeholders and policymakers as they manage changing reliability and security risk within the evolving industry landscape, and capturing cost efficiencies when practical.

As part of the business planning and budgeting process, NERC and the Regional Entities each have their own priorities and strategic focus areas, but continually come together to ensure alignment with the long-term strategy and that business processes and operations harmonize across the ERO Enterprise where appropriate.

Since risks to reliability and security are fluid and can be impacted by recent events, NERC and each Regional Entity may also create annual work plan priorities that summarize the most critical goals and objectives for the year. In many cases, these work plan priorities are also used for individual, departmental, and company performance measurement.

¹ Technical committees include the NERC Standing Committees (Compliance and Certification Committee, Personnel Certification and Governance Committee, Reliability Issues Steering Committee, Reliability and Security Technical Committee, and Standards Committee) and Regional Entity committees.

Regional Entity Strategic Planning

2026 Strategic Focus Areas

NPCC has developed a forward-looking long-term strategy that supports NPCC's vision and mission and the ERO-Enterprise Long-Term Strategy. The NPCC long-term strategy emphasizes reliability, resilience, and the security of the Bulk Power System across Northeastern North America. Looking towards 2026, this strategy serves as a roadmap for NPCC to continue its pivotal role in advising, promoting, building, enhancing, and regulating. NPCC aims to be viewed as a credible impartial advisor and trusted educator on energy-related matters in Northeastern North America. The NPCC focus areas identified in the long-term strategy are:

Advise and Educate on Energy-related Matters

NPCC is viewed as a credible impartial advisor and serves the public interest by educating and advising stakeholders, fostering collaboration, and helping to guide decision-makers on best practices and regulations when integrating reliable energy approaches in Northeastern North America.

Promote Reliability Across the Region

NPCC enhances the reliability of critical energy infrastructure in Northeastern North America, acting as an impartial regulator and addressing challenges from the changing energy supply mix, extreme weather events, and regional adaptation to energy technologies and the penetration of Distributed Energy Resources (DER) and Variable Energy Resources (VER).

Build and Develop a High-Performing, Engaged Workforce

NPCC aims to build a high-performing, engaged workforce by emphasizing collaboration, growth, and work-life balance, ensuring excellence in critical energy infrastructure responsibilities.

Enhance Resilience Against Critical Energy Infrastructure Threats

NPCC continues to fortify its internal systems and support the continued resilience of the critical energy infrastructure in Northeastern North America against both cyber and physical threats.

2026 Business Plan and Budget Overview

Funding and Budget Summary

Total NPCC Resource Requirements

NPCC proposes a 2026 total budget of \$29,650,458. This represents an increase of \$2,746,202 or 10.2% over the 2025 budget. The proposed 2026 funding requirement will be satisfied by a Regional Entity division assessment of \$26,622,578 and Criteria Services division membership fees of \$1,062,980 for a total of \$27,685,558. The total NPCC assessments and membership fees represent an increase of \$2,610,060 or 10.4% compared to the 2025 total assessments and membership fees. The following sections provide additional detail regarding the Regional Entity division. For more information regarding the Criteria Services division see <u>Criteria Services</u> <u>Division Activities</u>.

Regional Entity Resource Requirements

The proposed 2026 Regional Entity division budget of \$28,395,867 represents an increase of \$2,710,763 or 10.6% over the 2025 budget. The proposed Regional Entity assessment of \$26,622,578 represents an increase of \$2,529,748 or 10.5% over the 2025 assessment. Assessments are allocated between US \$15,739,353 or 59% and Canada \$10,883,225 or 41%. The proposed assessment includes the release of \$972,089 of reserves and \$500,000 of penalties to offset US assessments.

The following targeted budget changes allow NPCC to accomplish the specific objectives outlined in the 2026 Business Plan and Budget (dollars are stated as an increase in the 2026 budget compared to the 2025 budget).

Major Drivers

- **Personnel** expenses increase of \$2,554,519 is associated with the addition of 6.10 full time employees (FTEs); a budgeted 3.5% average salary increase due to a highly competitive recruiting and retention environment (includes merit increase and promotions/adjustments); and a projected 8% increase in medical premiums. The 2026 Budget includes the full year employment cost associated with FTEs onboarded throughout 2025. Additional FTEs are required for NPCC to address increasing workload and increasing complexity of initiatives. Changes in staffing by program area are addressed in the <u>Personnel Analysis</u> table on the following page and in subsequent program area sections.
- Meetings & Travel expenses increase of \$167,653 due to expanded outreach, inflation, and an increase in employees. Some meetings will continue to be held in virtual or hybrid format to contain costs and to allow for greater access through remote participation. Increase is partially offset by cost savings from efficiencies gained by streamlining onsite compliance engagement procedures over recent years to complete more work remotely reducing the required number of staff on-site and the duration of time spent onsite.

Regional Entity Statement of Activities and Variance Explanations

Statement	of Activities ar	nd Capital	Ex	penditu	res		
Statement	REGIONAL EN			portaitai	00		
	2025 Budget	2025 Projection	202 v 2	Variance 5 Projection 025 Budget ver(Under)	2026 Budget	Variance 2026 Budget v 2025 Budget Over(Under)	Variance %
Funding ERO Funding							
ERO Assessments	\$ 24,092,831	\$24,092,831	\$	-	\$ 26,622,578	\$ 2,529,747	
Penalty Sanctions ⁽¹⁾	500,000	500.000	Ť	-	500.000	- 2,020,141	
Total ERO Funding	\$ 24,592,831		\$	-	\$ 27,122,578	\$ 2,529,747	10.3%
·						. , ,	
Membership Dues	-	-		-	-	-	
Testing Fees	-	-		-	-	-	
Services & Software Workshops & Misc Revenue	60.625	60.625		-	48,500	(12,125)
Interest & Investment Income	127,992	300,000		172.008	252,700	124,708	
Total Funding (A)	\$ 24,781,448		\$	172,008	\$ 27,423,778	\$ 2,642,330	
F							
Expenses Personnel Expenses							
Salaries	\$ 14.428.204	\$14,428,204	\$	-	\$ 16,041,208	\$ 1,613,003	
Payroll Taxes	1,019,783			-	1,171,041	151,258	
Benefits	3,391,801	3,391,801		-	3,999,743	607,942	
Retirement Costs	1,519,549			-	1,701,865	182,316	
Total Personnel Expenses	\$ 20,359,338	\$20,359,338	\$	-	\$ 22,913,856	\$ 2,554,519	12.5%
Meeting Expenses							
Meetings & Conference Calls	\$ 519,832	\$ 468,251	\$	(51,581)	\$ 409,290	\$ (110,542)
Travel	913,300	933,473		20,173	1,191,496	278,196	
Total Meeting Expenses	\$ 1,433,132	\$ 1,401,724	\$	(31,408)	\$ 1,600,786	\$ 167,653	12.0%
Operating Expansion, evoluting Depresention							
Operating Expenses, excluding Depreciation Consultants & Contracts	\$ 1,210,000	\$ 1,195,000	¢	(15,000)	\$ 1,173,000	\$ (37,000)
Office Rent	431,000		Ŷ	(30,000)	389,500	(41,500	
Office Costs	1,318,728			(35,000)	1,443,376	124,648	
Professional Services	1,227,000	1,107,000		(120,000)	1,130,380	(96,620)
Miscellaneous	30,000	30,000		-	25,000	(5,000	,
Total Operating Expenses, excluding Depreciation	\$ 4,216,728	\$ 4,016,728	\$	(200,000)	\$ 4,161,256	\$ (55,472) -1.4%
Total Direct Expenses	\$ 26,009,198	\$25,777,790	\$	(231,408)	\$ 28,675,898	\$ 2,666,700	10.3%
Indirect Expenses	\$ (394,694) \$ (394,694)	¢		\$ (393,521)	\$ 1,173	-0.3%
indirect Expenses	\$ (354,054)	•	-	\$ (555,5 2 1)	\$ 1,175	-0.5%
Other Non-Operating Expenses	\$ -	\$ -	\$	-	\$-	\$-	
Total Expenses (B)	\$ 25,614,504	\$25,383,096	\$	(231,408)	\$ 28,282,377	\$ 2,667,873	10.5%
Change in Net Assets (=A-B)	\$ (833,056) \$ (429,640))\$	403,416	\$ (858,599)	\$ (25,543) 5.9%
Fixed Asset Additions (C)	\$ 70,600	70,600			\$ 113,490	\$ 42,890	60.8%
TOTAL BUDGET (=B+C)	\$ 25,685,104	\$25,453,696	\$	(231,408)	\$ 28,395,867	\$ 2,710,763	10.6%
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (903,656) \$ (500,240))\$	403,416	\$ (972,089)	\$ (471,849) 94.3%
FTES	77.20	77.20)	0.00	83.30	6.10) 8%

\$500,000 of penalties released from the Assessment Stabilization Reserve (ASR) to offset U.S. assessments as approved by the NPCC Board of Directors, NERC and FERC. ⁽¹⁾ Actual penalties invoiced in the current reporting year are shown as an increase in the ASR on the reserve summary table and will be reported as income on the audited financial statements in accordance with Generally Accepted Accounting Principles (GAAP).

(2) 2025 Projections are based on the first quarter statement of activities. It is anticipated that projections could change throughout 2025 and would be reflected in each subsequent quarter's statement of activities.

2026 Program Area Budgets – Major Budget Drivers

Program			Budget 2026		Variance \$	Variance %
Reliability Standards	\$	1,372,058	\$ 1,308,647	\$	(63,411)	-4.6%
Compliance Monitoring and Enforcement and Organization Registration and Certification	\$	15,084,666	\$ 16,920,537	\$	1,835,871	12.2%
Reliability Assessments and Performance Analysis	\$	5,572,263	\$ 5,824,579	\$	252,316	4.5%
Training, Education and Operator Certification	\$	201,566	\$ 435,455	\$	233,889	116.0%
Situation Awareness and Infrastructure Security	\$	3,454,550	\$ 3,906,649	\$	452,098	13.1%
Total	\$	25,685,103	\$ 28,395,867	\$	2,710,763	10.6%

This chart does not include allocation of working capital requirements among the program areas.

A summary of major budget increase drivers by statutory program is provided below.

Reliability Standards

• **Personnel** expenses decrease of \$3,721 due to a net decrease of 0.50 FTEs resulting from reorganization during 2025.

Compliance Monitoring and Enforcement and Organization Registration and Certification

• **Personnel** expenses increase of \$1,072,473 due to an increase of 2.95 FTEs to enhance CORC's capacity to effectively execute its remit of BPS risk-reduction, while also managing the additional workload associated with Inverter-Based Resource (IBR) registration, compliance monitoring and enforcement.

Reliability Assessment and Performance Analysis

• **Personnel** expenses increase of \$21,974 due to an increase of 0.70 FTEs to support increasing reliability assessments and studies, including increasing frequency and scope of ERO-wide probabilistic assessments.

Training and Education

- **Personnel** expenses increase of \$154,061 due to a net increase of 0.45 FTEs resulting from a reorganization during 2025 for the purpose of expanding training and education of stakeholders.
- Activities previously addressed under Technical Committees and Members Forums are included under the Training and Education Program beginning in 2026.

Situation Awareness and Infrastructure Security

• **Personnel** expenses increase of \$293,216 due to a net increase of 0.80 FTE to support increasing workload and complexity of Situational Awareness activities.

Administrative Services

	Administrative Services Program Resources (in whole dollars) Direct Expenses FTEs												
			FTEs										
	2025 Budget	2026 Budget	Increase (Decrease)	2025 Budget	2026 Budget	Increase (Decrease)							
Forum	\$192,884	\$0	(\$192,884)	0.50	0.00	-0.50							
General and Administrative	\$3,000,901	\$3,772,799	\$771,898	2.00	4.00	2.00							
Legal and Regulatory	\$1,001,463	\$1,063,616	\$62,154	2.25	2.25	0.00							
Information Technology	\$3,188,968	\$3,370,406	\$181,438	7.80	8.00	0.20							
Human Resources	\$410,616	\$493,193	\$82,577	2.00	2.00	0.00							
Finance and Accounting	\$1,078,849	\$1,142,186	\$63,338	3.00	3.00	0.00							
Total Administrative Services ¹	\$8,873,680	\$9,842,201	\$968,520	17.55	19.25	1.70							

NPCC's 2026 Administrative Services Direct Expenses and Fixed Assets total \$9,842,201 of which \$393,521 is allocated to NPCC's Criteria Services division, which is a non-statutory function. As a result of the allocation to the Criteria Services division, the Administrative Expenditures included in the 2026 statutory budget are \$9,448,680 which is an increase of \$969,693 from the 2025 budget of \$8,478,987.

- Activities previously addressed under Technical Committees and Members Forums are included under the Training and Education Program beginning in 2026.
- **Personnel** expenses increase of \$1,016,516 due to a net increase of 1.70 FTEs resulting from a reorganization during 2025 to expand outreach and enhance communications.
- **Meetings & Travel** expenses decrease of \$58,833 due to a reduction in the number of inperson Board of Directors meetings.
- Office Costs increase of \$111,068 due to investments in IT infrastructure and data management tools. While IT needs are rising, staff have negotiated lower software contracts and license renewals to partially offset these costs. The increase in IT subscription costs is driven by onboarding new employees, expanding data analytics and energy assessments, bringing tools in-house to enhance internal capabilities, reducing reliance on external consultants, security operations, and communication capabilities.
- **Professional Services** decrease of \$96,620 primarily associated with a decrease in independent director search fees.

Personnel Analysis and Expenses

Total FTEs by Program Area	2025 Budget	2026 Budget Direct FTES	2026 Budget Shared FTES	2026 Budget Total FTES	Change from 2025 Budget
REGIONAL EN	TITY DIVISION				
Operational Programs					
Reliability Standards	3.40	1.60	1.30	2.90	-0.50
Compliance Monitoring and Enforcement and Organization Registration and Certification	38.75	41.70	0.00	41.70	2.95
Training, Education, and Operator Certification	0.10	0.55	0.00	0.55	0.45
Reliability Assessment and Performance Analysis	10.30	11.00	0.00	11.00	0.70
Situation Awareness and Infrastructure Security	7.10	7.90	0.00	7.90	0.80
Total FTEs Operational Programs	59.65	62.75	1.30	64.05	4.40
Administrative Programs					
Technical Committees and Member Forums	0.50	0.00	0.00	0.00	-0.50
General and Administrative	2.00	4.00	0.00	4.00	2.00
Information Technology	7.80	8.00	0.00	8.00	0.20
Legal and Regulatory	2.25	2.25	0.00	2.25	0.00
Human Resources	2.00	2.00	0.00	2.00	0.00
Accounting and Finance	3.00	3.00	0.00	3.00	0.00
Total FTEs Administrative Programs	17.55	19.25	0.00	19.25	1.70
Total FTEs	77.20	82.00	1.30	83.30	6.10

¹A shared FTE is defined as an employee who performs both Regional Entity and Criteria Services division functions.

Personnel Expenses	Budget 2025	Budget 2026			Variance \$	Variance %
Total Salaries	\$ 14,428,204	\$	16,041,208	\$	1,613,003	11.2%
Total Payroll Taxes	1,019,783		1,171,041		151,258	14.8%
Total Benefits	3,391,801		3,999,743		607,942	17.9%
Total Retirement	1,519,549		1,701,865		182,316	12.0%
Total Personnel Expenses	\$ 20,359,338	\$	22,913,856	\$	2,554,519	12.5%
FTEs	77.20		83.30		6.10	7.9%
Cost per FTE						
Salaries	\$ 186,894	\$	192,572	\$	5,678	3.0%
Payroll Taxes	13,210		14,058		848	6.4%
Benefits	43,935		48,016		4,081	9.3%
Retirement	19,683		20,431		747	3.8%
Total Cost per FTE	\$ 263,722	\$	275,076	\$	11,354	4.3%

Explanation of Significant Variances – 2025 Budget versus 2026 Budget

Variance explanations can be found in the <u>Major Drivers</u> and <u>Major Budget Drivers</u>—Program <u>Areas Section</u>.

Consultants and Contracts

Consultants & Contracts		Budget 2025		Budget 2026	Variance \$	Variance %	
Reliability Standards	\$	15,000	\$	15,000	\$ -	0.0%	
Compliance Enforcement and Organization Registration and Certification	\$	-	\$	-	\$ -	-	
Reliability Assessment and Performance Analysis	\$	915,000	\$	928,000	\$ 13,000	1.4%	
Training and Education	\$	-	\$	-	\$ -	-	
Situation Awareness and Infrastructure Security	\$	190,000	\$	140,000	\$ (50,000)	-26.3%	
Member Forums	\$	-	\$	-	\$ -	-	
General and Administrative	\$	90,000	\$	90,000	\$ -	0.0%	
Legal and Regulatory	\$	-	\$	-	\$ -	-	
Information Technology	\$	-	\$	-	\$ -	-	
Human Resources	\$	-	\$	-	\$ -	-	
Accounting and Finance	\$	-	\$	-	\$ -	-	
Total Consultants and Contracts	\$	1,210,000	\$	1,173,000	\$ (37,000)	-3.1%	

Explanation of Significant Variances – 2025 Budget versus 2026 Budget

Variance explanations can be found in the <u>Major Drivers</u> and <u>Major Budget Drivers</u>—Program <u>Areas Section</u>.

Fixed Assets

Fixed Asset Additions	Budget 2025	Budget 2026	Variance \$	Variance %
Equipment CapEx	\$ 41,800	\$ 74,690	\$ 32,890	78.7%
Computer & Software CapEx	\$ 28,800	\$ 38,800	\$ 10,000	34.7%
Furniture & Fixtures CapEx	\$ -	\$ -	\$ -	-
Leasehold Improvements	\$ -	\$ -	\$ -	-
Allocation of Fixed Assets	\$ -	\$ -	\$ -	-
Total Fixed Asset Additions	\$ 70,600	\$ 113,490	\$ 42,890	60.8%

Explanation of Significant Variances – 2025 Budget versus 2026 Budget

• Increase in fixed asset additions due to website enhancements and laptop replacements scheduled for 2026.

Regional Entity Reserve Analysis

	and Operating Reserve			
	REGIONAL ENTITY DIVIS	SION		
	Total Reserve	Working Capital	Operating Reserve	Assessment Stabilization
Beginning Total Reserve, December 31, 2024	9,560,208	6,008,497	2,054,808	1,496,903 4
Plus: 2025 ERO Funding (from LSEs or designees)	24,592,831	24,592,831		
Plus: 2025 Other funding sources	360,625	360,625		
Plus: Penalties collected	0			0
Approved 2025 Penalties released to offset U.S. assessments	0	500,000		(500,000)
Less: 2025 Projected expenses & capital expenditures	(25,453,696)	(25,453,696)		
Projected Total Reserve, December 31, 2025	9,059,968	6,008,257	2,054,808	996,903
Projected Polar Reserve, December 31, 2023	3,033,300	0,000,237	2,034,000	330,303
Desired Total Reserve, December 31, 2026	7,587,880	4,819,307 1	2,271,669 2	496,903
Less: Projected Total Reserve, December 31, 2025	(9,059,968)	(6,008,257)	(2,054,808)	(996,903)
Increase(decrease) in assessments to achieve desired Total Reserve	(1,472,089)	(1,188,950)	216,861	(500,000)
2026 Expenses and Capital Expenditures	28,395,867			
Less: Penalty Sanctions (Applied to U.S. Only) ³	(500,000)			
Less: Other Funding Sources	(301,200)			
Adjustment to Operating Reserve to achieve desired Total Reserve balance ²	216,861			
Adjustment to Wokring Capital to achieve desired Total Reserve balance ¹	(1,188,950)			
2026 Assessment	26,622,578			

¹ Working Capital within a range from 8% to 25% of Budget. \$4,819,307 represents 17% of the 2026 budget of \$28,395,867

² Operating Reserve equal to 8% of Budget. \$2,271,669 represents 8% of the 2026 budget of \$28,395,867

³ Represents amount applied to reduce 2026 assessments. Balance of collections July 1, 2024 through June 30, 2025 retained for assessment stabilization purposes.

⁴ Assessment Stabilization Reserve balance was \$1,071,903 at June 30, 2024. Penalty Sanctions totaling \$186,000 were collected July 1, 2024 through December 31, 2024.

Explanation of Changes in Reserves

There was no change to the existing Working Capital and Operating Reserve Policy. NPCC maintains an Assessment Stabilization Reserve (ASR) separate from the Working Capital and Operating Reserve. The purpose of the ASR is to enable penalty funds to be released in multiple budget years to avoid large fluctuations in assessments. NERC Rules of Procedure Section 1107.2 specifies that penalty funds received by NPCC during the 12 months ended June 30th are to be used in the subsequent budget year to offset assessments. Pursuant to Section 1107.4, exceptions or alternatives to this provision are allowed if approved by NERC and FERC. Therefore, pursuant to Section 1107.4, NERC and NPCC request that the Commission approve an exception to the requirement of Section 1107.2 that all penalties collected during the 12 months ended the previous June 30 be used to reduce NPCC's assessments in the following year, in order to allow NPCC to (i) deposit the \$186,000 of penalties collected during the 12 months ended June 30, 2025 into the ASR, and (ii) use \$500,000 of the penalty funds in the ASR to reduce its 2026 assessment. In future years, NPCC will specify the amount of penalty funds to be released and the amount of penalty funds to be retained to offset assessments in future years within its Business Plan and Budget to be approved annually by NPCC's Board of Directors, NERC, and FERC.

Three-Year Budget Projections

Statement of Activities and Capital Expenditures 2026 Budget & Projected 2027 and 2028 Budgets

		2026 Budget	2027 Projection	\$ Change 26 v 27	% Change 26 v 27		2028 Projection	\$ Change 27 v 28	% Change 27 v 28
Funding		Daagot		10111				2 20	
ERO Funding									
ERO Assessments	\$	26,622,578	\$ 30,472,556	\$ 3,849,978	14.5%	\$	33,720,766	\$ 3,248,209	9.6%
Penalties Released		500,000	300,000	(200,000)	-40.0%	_	150,000	(150,000)	-100.0%
Total ERO Funding	\$	27,122,578	\$ 30,772,556	\$ 3,649,978	13.5%	\$	33,870,766	\$ 3,098,209	9.1%
Membership Dues		-	-	-			-	-	
Testing Fees		-	-	-			-	-	
Services & Software		-	-	-			-	-	
Workshops & Miscellaneous		48,500	48,500	-	0.0%		48,500	-	0.0%
Interest & Investment Income		252,700	260,000	7,300	2.9%		268,000	8,000	3.1%
Total Funding (A)	\$	27,423,778	\$ 31,081,056	\$ 3,657,278	13.3%	\$	34,187,266	\$ 3,106,209	10.0%
Expenses									
Personnel Expenses									
Salaries	\$	16,041,208	\$ 18,022,650	\$ 1,981,442	12.4%	\$	19,633,443	\$ 1,610,793	8.9%
Payroll Taxes		1,171,041	1,337,303	166,262	14.2%		1,501,542	164,238	12.3%
Benefits		3,999,743	4,559,727	559,985	14.0%		5,113,311	553,584	12.1%
Retirement Costs		1,701,865	1,931,976	230,112	13.5%		2,159,895	227,919	11.8%
Total Personnel Expenses	\$	22,913,856	\$ 25,851,657	\$ 2,937,801	12.8%	\$	28,408,191	\$ 2,556,533	9.9%
Meeting Expenses									
Meetings & Conference Calls	\$	409,290	\$ 421,569	\$ 12,279	3.0%	\$	434,216	\$ 12,647	3.0%
Travel		1,191,496	1,227,240	35,745	3.0%		1,264,058	36,817	3.0%
Total Meeting Expenses	\$	1,600,786	\$ 1,648,809	\$ 48,024	3.0%	\$	1,698,273	\$ 49,464	3.0%
Operating Expenses									
Consultants & Contracts	\$	1,173,000	1,271,460	98,460	8.4%		1,221,889	\$ (49,571)	-3.9%
Office Rent		389,500	397,290	7,790	2.0%		405,236	7,946	2.0%
Office Costs		1,443,376	1,572,244	128,868	8.9%		1,703,688	131,445	8.4%
Professional Services		1,130,380	1,370,988	240,608	21.3%		1,398,407	27,420	2.0%
Miscellaneous		25,000	 25,000	 -	0.0%		25,000	-	0.0%
Total Operating Expenses	\$	4,161,256	\$ 4,636,981	\$ 475,725	11.4%	\$	4,754,221	\$ 117,240	2.5%
Total Direct Expenses	\$	28,675,898	\$ 32,137,448	\$ 3,461,550	12.1%	\$	34,860,685	\$ 2,723,237	8.5%
Indirect Expenses	\$	(393,521)	\$ (401,391)	\$ (7,870)	2.0%	\$	(409,419)	\$ (8,028)	2.0%
Other Non-Operating Expenses	\$		\$	\$		\$	-	\$ -	
Total Expenses (B)	\$	28,282,377	\$ 31,736,056	\$ 3,453,679	12.2%	\$	34,451,266	\$ 2,715,209	8.6%
Change in Assets	\$	(858,599)	\$ (655,000)	\$ 203,599	-23.7%	\$	(264,000)	\$ 391,000	-59.7%
Fixed Assets Additions (C)	\$	113,490	\$ 245,000	\$ 131,510	115.9%	\$	36,000	\$ (209,000)	-85.3%
TOTAL BUDGET (=B+C)	\$	28,395,867	\$ 31,981,056	\$ 3,585,189	12.6%	\$	34,487,266	\$ 2,506,209	7.8%
TOTAL CHANGE IN WORKING CAPITAL (=A-B-	C) <u>\$</u>	(972,089)	\$ (900,000)	\$ 72,089	-7.4%	\$	(300,000)	\$ 600,000	0.0%
FTEs		83.30	91.30	8	9.6%		98.30	7	7.7%

Key Assumptions

2027

- Increase of 8 FTEs (3 CORC, 1 RAPA, 2 Data Analytics, 2 IT) and full year cost of employment for FTEs onboarded throughout 2026.
- 3.5% average merit increase.
- Inflationary increases.
- Professional services increase primarily associated with exploring the transition to a more balanced hybrid Board structure by increasing the number of independent directors.
- Increase in fixed asset additions due to laptop replacements and improving third-party risk management.

2026 Business Plan and Budget

2028

- Increase of 7 FTEs (3 CORC, 3 IT, 1 Corporate Communications).
- 3.5% average merit increase.
- Inflationary increases.
- Decrease in fixed asset additions due to no major equipment replacements scheduled for 2028.

Regional Entity Assessment Analysis

In the area of assessments there are distinct funding mechanisms as outlined in the following table. For the Regional Entity (RE) division, NERC will assess load serving entities (LSEs) or their designees (within NPCC the designees are the Balancing Authority Areas (BAAs) for New York, New England, New Brunswick, Nova Scotia, Ontario, and Québec) based upon 2024 proportional Net Energy for Load (NEL) and other specific program area funding arrangements and make quarterly remittances to the Regional Entity on or about the 15th day of January, April, July, and October. For funding associated with the Criteria Services division, the Independent System Operators/Balancing Authority Areas (ISO/BAAs) will be assessed by NPCC for their proportional share of the divisional budget based upon 2024 NEL within the Region. Non-ISO/BAA Full Members will be assessed no membership fee.

NPCC Cost Allocation Methodology

The accompanying table provides information regarding cost allocation for both the Regional Entity division and the Criteria Services division of NPCC, including the details associated with the funding of the Compliance Program within the RE division. For purposes of determining assessments to support NPCC's resource requirements, costs are allocated among the ISOs/BAAs within NPCC as the designees for the LSEs in New York, New England, Ontario, Québec, New Brunswick, and Nova Scotia.

To reflect and respect the international membership and nature of NPCC, any sub-Regional reliability assessment costs in response to U.S. only regulatory initiatives will be considered for allocation to U.S. only ISOs/BAAs consistent with NERC Rules of Procedure Section 1102. Additionally, the compliance responsibilities and authorities within the U.S., and the specific compliance responsibilities within each of the Canadian provinces within NPCC, and the attendant costs of portions of the compliance program differ among the areas within the Regional Entity. Within the U.S. portion of NPCC all costs attributable to delegated (statutory) functions performed by NPCC, including all compliance functions, are assessed based on a NEL allocation. Within the Canadian portion of NPCC those costs attributable to compliance functions performed by NPCC on behalf of provincial governmental and/or regulatory authorities are allocated consistent with the unique MOUs or Agreements that have been entered into for those provinces. To address these different compliance regimes, NPCC developed a composite cost allocation methodology that allocates U.S. only reliability assessment and compliance costs on a fair and equitable basis within the Regional Entity.

As an initial step of that methodology, the NEL for each of the BAAs and their relative percentage to the NPCC total NEL is calculated for the most recent year for which data is available, the second previous year. To establish the RE division funding requirements for each BAA on a NEL basis for all programs except for Compliance, the proposed expenses and fixed assets of all other programs are calculated and the adjustment for the RE division cash reserve requirement is identified. Penalty funds received from NPCC registered entities within the U.S. are then allocated among the NPCC program areas based on their FTE ratio and between the U.S. BAAs based on their relative NELs. Consistent with each of the Canadian provincial MOUs and Agreements, all penalty funds resulting from compliance actions within Canada, if any, would remain within the applicable province. The total budgeted fees for NPCC workshop participation are indicated as a credit, with the resultant addition being the RE division assessment, without the compliance program costs, calculated on a NEL basis.

In accordance with the NPCC Amended and Restated Bylaws the Criteria Services (CS) division proposed expenses and fixed assets of all programs are calculated and the adjustment for the

CS division cash reserve requirement is identified, with the resultant addition being the CS division funding requirement and assessment, calculated on a NEL basis.

For costs associated with the RE division compliance program, NPCC's allocation methodology has been enhanced to better stabilize assessments. NPCC applies a rolling seven-year compliance cost average to total compliance program expenses for the current budget year. For each of the seven years, costs attributed to CORC Fundamentals (CF), are allocated between the BAAs in the United States and Canada on a NEL basis.

Compliance Audits and Investigations (CAI) related costs are allocated between U.S. and Canadian BAAs in NPCC, and among the Canadian provinces, using an audit-based methodology. The audit-based methodology incorporates relative costs based on categories of compliance audits which are reflective of their size and complexity, as well as the differing compliance program implementation models that are utilized in NPCC due to the international nature of the Regional Entity. The portion allocated to the U.S. BAAs in NPCC is calculated using the audit-based methodology, and this amount is then re-allocated between the New York and New England BAAs based on their relative NEL.

Compliance Mitigation and Enforcement (CME) related costs are allocated between U.S. and Canadian BAAs in NPCC, and among the Canadian provinces, using an enforcement activitybased methodology. Based on historical data, NPCC reviewed each BAAs percentage of violations, mitigation plans and settlement agreements to determine each BAA's total average percentage of enforcement activities. The portion allocated to the U.S. BAA's in NPCC is calculated using the enforcement activity-based methodology, and this amount is then reallocated between the New York and New England BAAs based on their relative NEL.

The seven-year average allocation percentage of total combined compliance costs for each BAA is then applied to the total compliance program expenses for the current budget year to mitigate fluctuations in assessments from year to year.

Penalty funds received from NPCC registered entities within the U.S. are then allocated among the NPCC program areas based on their FTE ratio and between the U.S. BAAs based on their relative NELs, and then added to the total compliance program expenses and fixed assets to yield a total compliance program assessment.

The CORC actual vs budget variance from the most recent year for which audited financials are available is broken out from the rest of the Adjustment to Cash Reserve and assigned to the CORC program allocation of costs. Within Québec these costs are funded directly by the regulator, therefore, the assignment of program area variances needs to respect those specific circumstances.

Finally, the total RE division funding requirements and assessments by BAA are tabulated and the total funding requirements and assessments for NPCC, both the RE and CS divisions, are combined.

Regional Entity and Criteria Services Funding Allocation Table

 TO BE INSTERTED											

Regional Entity Program Goals and Statements of Activities

Reliability Standards Program

Program Scope and Functional Description

The NPCC Reliability Standards Program Area supports the NERC Reliability Standards Program and aids in the development of NPCC Regional Reliability Standards, and NPCC regional Variances to NERC Reliability Standards.

The NPCC Reliability Standards Program conducts a five-year review of the NPCC Regional Reliability Standard (PRC-006-NPCC-2) and the FERC approved Regional Standard Process Manual (RSPM). These reviews may result in revisions to the Standard, retirement of the Standard, or a finding that no changes are required.

NPCC supports the development of NPCC regional Variances to NERC Reliability Standards when it is necessary to address NPCC regionally-specific physical differences in the BPS or a NPCC northeastern North American specific reliability issue.

2026 Key Assumptions

- NPCC expects the overall volume of NERC Reliability Standard development projects to increase with the anticipated changes in the areas of cold weather operations, cyber security, supply chain, data gathering, and modeling of inverter-based resources (IBR).
- NPCC expects the standard development process to change based on NERC's establishment of the Modernization of Standards Processes and Procedures Task Force.
- NPCC's Regional Reliability Standards development activity is expected to remain at a stable level, driven by requests that the Regional Entity will receive or reliability issues that are identified and not under consideration by NERC. These include periodic review of NPCC's Regional Standard PRC-006-NPCC-2, Variances to NERC Reliability Standards to address reliability concerns or to recognize the unique topology and reliability considerations of the Northeast (i.e., Québec's recognition as an asynchronous interconnection within NPCC's footprint).

2026 Goals and Key Deliverables

- Participate in the annual development and revision of the NERC's three-year Reliability Standards Development Plan (RSDP) through review, commenting, and other Reliability Standards Committee (RSC) activities.
- Participate in the NERC Standards Committee activities, as a representative for NPCC Regional stakeholders to advance strategic initiatives, to measure the effectiveness and quality of standards, support ERO efforts to address outstanding FERC Directives, and provide input in the prioritization of standards development projects.
- Conduct thorough reviews of all NERC standards under development or revision by leveraging existing NPCC Task Forces and subject matter experts and coordinate NPCC comments for Northeastern North America.
- Review and identify issues and concerns raised in FERC Notice of Proposed Rulemakings (NOPRs) and Notice of Inquiries (NOIs) for all standards related issues as appropriate.
- Actively monitor the activities of the Reliability and Security Technical Committee (RSTC) and the development of Standard Authorization Requests (SARs) to address emerging reliability issues.
- Participate in and provide support to NERC standard development projects, including the Cold Weather standard, Energy Assurance standard, CIP standards, Supply Chain standards, and the development and revision of standards associated with FERC directive 901 to address reliability issues driven by inverter-based resources.

- Conduct reviews of the NPCC Regional Standard as necessitated by the revision and approval of any associated continent-wide NERC reliability standards or further reliability related need.
- Conduct the development of any Québec Interconnection-Wide variances to NERC continent-wide standards using the NPCC Reliability Standards Development Process.
- Maintain and revise the NPCC DER/VER Guidance document as necessary to promote consistency across the NPCC footprint where appropriate.
- In conjunction with the Reliability Coordinating Committee (RCC), review any DER/VER impacts identified by stakeholders and develop an approach to promote awareness and resolution of any issues.
- Identify opportunities and processes for cost effectiveness analysis activities to determine the need to revise a standard during the Enhanced Periodic Review or Standards Grading activities.
- Provide guidance and outreach on approved NERC Reliability Standards and Regional Standards.

The Statement of Activities for this program area is shown below. See <u>Reliability Standards Major</u> <u>Budget Drivers</u> for explanation of significant variances.

Reliability Standards Statement of Activities

Statement of Activities and Capita	I Ex	penditu	re	s 2025 I	Bu	dget and	20	026 Bud <u>ç</u>	jet			
	Reliability Standards											
	2025 Budget					2026 Budget	Variance (\$)		Variance %			
Funding		Duugei		Tojection		Duugei		(Ψ)	70			
ERO Funding												
ERO Assessments	\$	1,343,559	\$	1,343,559	\$	1,286,009	\$	(57,550)				
Penalty Sanctions		28,500		28,500		22,639		(5,861)				
Total ERO Funding	\$	1,372,058	\$	1,372,058	\$	1,308,647	\$	(63,411)	-5%			
Membership Dues		-		-		-		-				
Testing Fees		-		-		-		-				
Services & Software		-		-		-		-				
Workshops & Misc Revenue		-		-		-		-				
Interest & Investment Income	\$	1,372,058	\$	1,372,058	\$	1,308,647	\$	(63,411)	-5%			
Total Funding (A)	<u> </u>	1,372,050	Þ	1,372,056	Þ	1,306,647	Þ	(63,411)	-5%			
Expenses Personnel Expenses												
Salaries	\$	550,301	¢	550,301	¢	540,557	¢	(9,744)				
Payroll Taxes	φ	44.694	φ	44.694	φ	42.623	φ	(9,744) (2,070)				
Benefits		169,296		169,296		173,499		4,203				
Retirement Costs		52.880		52,880		56,772		4,203 3,891				
Total Personnel Expenses	\$	817,171	\$	817,171	\$	813,451	\$	(3,721)	0%			
	Ψ	017,171	Ψ	017,171	Ψ	013,431	Ψ	(3,721)	070			
Meeting Expenses												
Meetings & Conference Calls	\$	592	\$	592	\$	4,100	\$	3,508				
Travel		53,400		53,400		45,288		(8,113)				
Total Meeting Expenses	\$	53,992	\$	53,992	\$	49,388	\$	(4,604)	-9%			
Operating Expenses, excluding Depreciation												
Consultants & Contracts	\$	15,000	\$	15,000	\$	15,000	\$	-				
Office Rent		-		-		-		-				
Office Costs		2,600		2,600		3,000		400				
Professional Services		-		-		-		-				
Miscellaneous Total Operating Expenses, excluding Depreciation	\$	- 17,600	\$	- 17,600	\$	- 18,000	\$	- 400	2%			
Total Direct Expenses	\$	888,763	\$	888,763	\$	880,838	\$	(7,925)	-1%			
Indirect Expenses	\$	479,271	\$	479,271	\$	422,671	\$	(56,600)	-12%			
Other Non-Operating Expenses	\$	-	\$	-	\$	-	\$	-				
Total Expenses (B)	\$	1,368,034	\$	1,368,034	\$	1,303,509	\$	(64,526)	-5%			
Change in Net Assets (=A-B)	\$	4,024	\$	4,024	\$	5.139	\$	1,114	28%			
	<u> </u>	-,02-1	<u> </u>	4,024	Ť	0,100	Ť	.,	20%			
Fixed Asset Additions, excluding Right of Use Assets(C)		4,024		4,024		5,139		1,114	28%			
TOTAL BUDGET (=B+C)	\$	1,372,058	\$	1,372,058	\$	1,308,647	\$	(63,411)	-5%			
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$	-	\$	-	\$	-	\$	-				
FTES		2 40				2 00		-0.50	-15%			
	3.40					2.90	-13%					

Compliance Monitoring and Enforcement and Organization Registration and Certification Program

Program Scope and Functional Description

The NPCC Compliance Monitoring and Enforcement and Organization Registration and Certification Program (CORC) Program Area operates in accordance with the NERC Rules of Procedure, the Amended and Restated Delegation Agreement between NPCC and NERC, and individual Canadian Provincial MOUs and/or Agreements. The program supports Compliance Monitoring and Enforcement (Section 400 of the ROP) and Organization Registration and Certification (Section 500 of the ROP). NPCC CORC strives to be a credible authority that is independent, impartial, and objective, while promoting a culture of reliability excellence.

The CORC Program Area scope includes:

- Identification, registration, and certification of entities that are required to comply with the NERC Reliability Standards and NPCC Regional Reliability Standards.
- Implementation of the NERC Compliance Monitoring and Enforcement Program (CMEP) in the U.S., including the compliance monitoring, mitigation assessment and enforcement of NERC Reliability Standards and Regional Reliability Standards effective in the U.S.
- Pursuant to the relevant MOUs, the implementation of compliance monitoring and enforcement activities in Nova Scotia and Ontario, including the assessment and enforcement of NERC Reliability Standards and Regional Reliability Standards effective in those jurisdictions.
- Implementation of the Québec Reliability Standards Compliance Monitoring and Enforcement Program (QCMEP), including the compliance monitoring, assessment and enforcement of NERC Reliability Standards and Regional Reliability Standards effective in Québec.
- Implementation of the New Brunswick Compliance Monitoring and Enforcement Program (NBCMEP) in New Brunswick, including the compliance monitoring, assessment and enforcement recommendations of the NERC Reliability Standards and Regional Reliability Standards effective in New Brunswick.

The CORC Program Area scope is sub-divided into three sub-program areas: Compliance Fundamentals (CF); Compliance Audits and Investigations (CAI); and Compliance Mitigation and Enforcement (CME).

Compliance Fundamentals (CF)

The CF sub-program area is responsible for registration, certification, entity inherent risk assessments, and compliance oversight plan activities, in addition to general compliance activities that may span across sub-program areas.

- Collaborates across the ERO through participation in the Risk Performance and Monitoring Group (RPMG), Organization Registration and Certification Group (ORCG), and the development of the annual ERO CMEP staff workshop.
- Identifies and registers the BES owners, operators, and users that are required to comply with the NERC and Regional Reliability Standards.
- Conducts Certifications and Certification Reviews in accordance with the NERC Rules of Procedure.
- Leads or assists with the development of the annual CMEP implementation plans (ERO Enterprise, New Brunswick, Québec).
- Implements the ERO Enterprise registration tool, Centralized Organization Registration ERO System (CORES); and the ERO Enterprise CMEP data application, Align.

- Responds to any complaints submitted to NPCC.
- Maintains any NPCC specific compliance tools or programs needed.
- Performs outreach, sends relevant communications, and conducts stakeholder compliance workshops on an annual basis.
- Assesses compliance trends.
- Conducts outreach, training, and education to support Reliability Standards implementation.
- Conducts Inherent Risk Assessments (IRAs) on registered entities.
- Develops Compliance Oversight Plans (COPs) for registered entities.

Compliance Audits and Investigations (CAI)

The CAI sub-program area is responsible for conducting all risk-based compliance monitoring activities.

- Conducts NPCC compliance monitoring activities, including audits, spot checks, and selfcertifications.
- Incorporates the results of entity IRA, COP, and performance data into its compliance monitoring process.
- Assesses the maturity of the entity's internal controls and sustainability of the entity processes during compliance engagements.
- Engages the entity on the maturity of their internal compliance program.
- Issues audit reports and spot check reports.
- Provides self-certification result letters.
- Implements and maintains the Critical Infrastructure Protection (CIP) Standards Technical Feasibility Exceptions process.
- Maintains the Periodic Data Submittal process and reviews submittals.
- Performs outreach, sends relevant communications, and conducts stakeholder compliance workshops on an annual basis.
- Collaborates across the ERO through participation in the Risk Performance and Monitoring Group (RPMG), Operations and Planning Compliance Task Force (OPCTF), CIP Compliance Task Force (CCTF), Manual Task Force (MTF), and the development of the annual ERO CMEP staff workshop.
- Implements the ERO Enterprise CMEP data application, Align.

Compliance Mitigation and Enforcement (CME)

The CME sub-program area is responsible for enforcement activities in accordance with riskbased approaches and conducting technical assessments of registered entities' plans and activities to mitigate noncompliance. Depending on the jurisdiction, CME either makes official recommendations to the appropriate regulatory authority or assists and coordinates with NERC to make such official recommendations.

- Determines the relevant facts and circumstances necessary to assess each noncompliance.
- Evaluates and assigns a risk level to each noncompliance.
- Advises on the mitigation required to prevent recurrence of the issue.
- Evaluates and approves the mitigation activities or Mitigation Plan(s) for each noncompliance.
- Assesses the relevant compliance history for each noncompliance.
- Determines the disposition method for each noncompliance.
- Conducts settlement negotiations.
- Calculates penalty and non-penalty sanctions in a consistent manner.
- Files noncompliance closings with NERC/FERC and applicable Canadian governmental and/or provincial Regulatory authorities.

- Evaluates registered entities for participation in the Self-Logging Program.
- Collaborates across the ERO through participation in the Enforcement Group (EG) and the development of the annual ERO CMEP staff workshop.

2026 Key Assumptions

- The volume of registrations will increase based on the changing resource mix and modification to the registration criteria to include non-BES Inverter Based Resources.
- The number of Certifications has increased and will remain elevated as many entities are upgrading or building new Control Centers and building new Energy Management Systems.
- The number of incoming noncompliance will increase due to new registered entities, new standards, and new facilities.

2026 Goals and Key Deliverables

- Conduct scheduled compliance monitoring and enforcement activities pursuant to the 2026 Implementation Plans.
- Continue applying risk-based approaches for CMEP, registration, and certification activities.
- Identify potential issues related to NERC Reliability Standards and Regional Reliability Standards as a result of compliance monitoring, enforcement, and event analysis activities.
- Continue to implement compliance responsibilities in Canada based on the unique regulatory structure specific to each provincial and/or governmental jurisdiction.
- Evaluate and enhance monitoring, violation processing, risk-assessment, registration and certification program for sufficiency and effectiveness.
- Collaborate within the ERO Enterprise to continue to implement and update Align and the Secure Evidence Locker (SEL).
- Provide education and outreach to the registered entities on all CMEP, registration, and certification topics, including the development and implementation of the ERO Enterprise Registration tool, CORES, and the Align/SEL CMEP data application.
- Conduct one in-person compliance workshop and virtual compliance webinars.
- Develop annual activity reports for CMEP (New Brunswick) and QCMEP (Québec).
- Develop and/or provide input on various 2026 CMEP Implementation Plans (ERO Enterprise, Québec, New Brunswick).
- Remain updated on industry trends and attend training necessary and/or beneficial to performing duties (Registration, Certification, Entity Risk Assessment, assessment of internal controls, Monitoring, and Enforcement activities).
- Continue to perform and update IRAs and COPs for registered entities as needed.
- Continue to assess and document internal controls during monitoring engagements.
- Conduct 2026 compliance engagement schedule based on budget, risk to the BPS, and number of registered entities.
- Continue to perform comprehensive enforcement activities to determine the relevant facts and circumstances necessary for each noncompliance, assess the risk, and evaluate the mitigation activities or Mitigation Plan. Determine the disposition method in accordance with established risk-based approaches (Compliance Exceptions, FFTs, Simplified Identification Correction Method (Québec), Settlements, etc.).
- Track the progress and verify the completion of each Mitigation Plan.
- As necessary, represent NPCC during any enforcement hearings before the NPCC Hearing Body, the NERC Hearing Body, the Régie, or the New Brunswick Energy & Utilities Board.

- Provide responses to oversight activities performed by NERC, FERC, and other relevant authorities.
- Analyze noncompliance trends and associated risks to develop guidance to registered entities in support of a culture of reliability.
- Perform outreach (e.g., webinars, workshops) to educate entities on determining noncompliance root causes, techniques for noncompliance assessment, communications associated with self-reporting, and guidance on the development of mitigation activities that will prevent recurrence.

The Statement of Activities for this program area is shown below. See <u>Compliance Monitoring</u> <u>and Enforcement and Organization Registration and Certification Program Major Budget Drivers</u> for explanation of significant variances.

Compliance Monitoring and Enforcement Statement of Activities

Statement of Activities and Capital Expenditures 2025 Budget and 2026 Budget Compliance Monitoring and Enforcement and Organization Registration and Certification

	2025 Budget	2026 Budget	Variance (\$)	Variance %
Funding		-		
ERO Funding				
ERO Assessments	\$ 14,644,934 \$			
Penalty Sanctions	324,811	325,527	716	
Total ERO Funding	\$ 14,969,746 \$	5 16,062,228 \$	5 1,092,482	7%
Membership Dues	-	-	-	
Testing Fees	-	-	-	
Services & Software	-	-	-	
Workshops & Misc Revenue	-	-	-	
Interest & Investment Income Total Funding (A)	- \$ 14,969,746 \$	- 16,062,228	5 1,092,482	7%
_				
Expenses				
Personnel Expenses				
Salaries	\$ 6,553,205			
Payroll Taxes	497,543	565,173	67,631	
Benefits	1,486,808	1,821,975	335,168	
Retirement Costs	676,472	743,767	67,295	4.00/
Total Personnel Expenses	\$ 9,214,027	5 10,286,500 S	5 1,072,473	12%
Meeting Expenses				
Meetings & Conference Calls	\$ 17,646 \$	§ 13,000 \$	6 (4,646)	
Travel	318,350	431,438	113,088	
Total Meeting Expenses	\$ 335,996	\$ 444,438	5 108,442	32%
Operating Expenses, excluding Depreciation				
Consultants & Contracts	\$ - \$	ş - s	- 3	
Office Rent	-	-	-	
Office Costs	26,500	38,000	11,500	
Professional Services	-	-	-	
Miscellaneous		-	-	
Total Operating Expenses, excluding Depreciation	\$ 26,500 \$	\$ 38,000	5 11,500	43%
Total Direct Expenses	\$ 9,576,523	\$ 10,768,937 \$	5 1,192,415	12%
Indirect Expenses	\$ 5,462,280 \$	6,077,712	615,432	11%
Other Non-Operating Expenses	\$-\$	6 - 9	5 -	
Total Expenses (B)	\$ 15,038,802	5 16,846,649	5 1,807,846	12%
Change in Net Assets (=A-B)	\$ (69,057) \$	6 (784,421) \$	6 (715,364)	1036%
Fixed Asset Additions, excluding Right of Use Assets (C)	45,863	73,888	28,025	61%
TOTAL BUDGET (=B+C)	\$ 15,084,666	\$ 16,920,537 \$	5 1,835,871	12%
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (114,920) \$	\$ (858,309) \$	6 (743,389)	647%
FTES	38.75	41.70	2.95	8%

Reliability Assessment and Performance Analysis Program

Program Scope and Functional Description

The NPCC Reliability Assessments and Performance Analysis (RAPA) Program Area independently analyzes, assesses, and reports on the reliability and adequacy of the BPS within the NPCC footprint. The program aides in the identification and assesses risks across the region. The RAPA program activities include: the performance of resource and transmission assessment studies; special analyses and investigations; and the collection and dissemination of data, lessons learned, and other information. The RAPA program provides resources, case studies and data input for the technical analyses, and support of the many risk-based activities. The program also facilitates five technical stakeholder task forces and associated working groups.

2026 Key Assumptions

The RAPA program concentrates on the four key value drivers and long-term focus areas set forth in the ERO Enterprise Long-Term Strategy, the strategic reliability focus areas identified within the NPCC Long-Term Strategy, and the Reliability Coordinating Committee Work Plan for calendar year 2025 - 2026.

Additionally, NPCC acts collectively and collaboratively through the Eastern Interconnection Reliability Assessment Group (ERAG) to focus on the reliability assessments of the Eastern Interconnection to identify and address potential reliability issues.

2026 Goals and Key Deliverables

- Assessments of Reliability Performance
 - Load, Capacity, Energy, Fuels & Transmission Report (LCEF&T Report): Represent data submitted by NPCC to NERC as part of the annual EIA-411 filing. U.S. data is forwarded by NERC to the U.S. Energy Information Administration (EIA). Data for planned generating unit additions and changes is considered confidential information by the EIA, NERC and NPCC. This report presents actual and ten-year projections for load, capacity, energy, fuel, transmission line construction and transformer additions in the NPCC footprint.
 - NPCC Summer Reliability Assessment: Focuses on the assessment of reliability within the NPCC footprint for the Summer Operating Period.
 - NPCC Winter Reliability Assessment: Focuses on the assessment of reliability within the NPCC footprint for the Winter Operating Period.
 - NPCC Annual and Seasonal Tie Benefits Report: Verifies that the current levels of interconnection benefits assumed in each Area's resource adequacy studies are reasonable and do not overstate the amount of interconnection assistance available for the applicable time periods.
 - NPCC Review of Resource Adequacy: Review for each NPCC Area in accordance with the requirements specified in the NPCC Regional Reliability Reference Directory # 1, Design and Operation of the BPS.
 - NPCC Probabilistic Assessment: Provides the NPCC probabilistic reliability metric results specified by NERC for the corresponding LTRA.
 - Collect NPCC data and contribute to the production of assessment reports for the NERC long-term, seasonal, and special assessments.
 - Provide NPCC regionally-specific technical support for the ERO Enterprise expanded and enhanced system studies and analyses, as needed.
 - Collaborate through ERAG in performance of Eastern Interconnection assessment studies and the Eastern Interconnection-wide Energy Assessment.
 - Update of power-flow and dynamic base cases that represent the BPS within the NPCC footprint for the ERAG Multiregional Modeling Working Group (MMWG).

- Facilitate the ERAG Acceptable Model Working Group (AMWG) that is responsible for the development and maintenance of an acceptable model list for the Eastern Interconnection dynamic base cases.
- Reporting Requirements
 - Collect, verify, and validate NPCC regionally-specific data for the Transmission Availability Data System (TADS), Generator Availability Data System (GADS), Demand Response Availability Data System (DADS), Misoperation Information Data Analysis System (MIDAS), and Geomagnetic Disturbance Data System (GMD).
- Other Requirements and Activities
 - Support risk-based activities with the development and review of lessons learned, best practices, and guidance documentation across the ERO Enterprise and industry.
 - Facilitate a peer review process to analyze protective relay misoperation information and track corrective action plans, as reported in the NERC MIDAS system, via the NPCC SP-7 Working Group on Protection Systems Misoperation Review.
 - NPCC actively participates in NERC committees, subcommittees, task forces, and other technical groups, such as the ERO Reliability Assessment and Performance Analysis Steering Group, Inverter-Based Resource Performance Subcommittee, Reliability Assessment Subcommittee, System Planning Impacts from DER Working Group, Electric Gas Working Group, Energy Reliability Assessment Working Group, Performance Analysis Subcommittee, Probabilistic Assessment Working Group, ERO Analytical Community of Excellence (ERO ACE) and associated subgroups including the MIDAS User Group, TADS User Group, and GADS User Group.
 - Continue to support stakeholder participation and interaction through various NPCC technical groups, including the RCC, Task Force on Coordination of Operations, Task Force on Coordination of Planning, Task Force on Infrastructure Security & Technology, Task Force on System Protection, Task Force on System Studies and the associated working groups and sub-teams.
 - Work in collaboration with the industry and governmental organization such as the U.S. Department of Energy (DOE), National Laboratories, Institute of Electrical and Electronics Engineers (IEEE), Electric Power Research Institute (EPRI), Energy Systems Integration Group (ESIG) and Conseil International des Grands Réseaux Electriques (CIGRE).

The Statement of Activities for this program area is shown below. See <u>Reliability Assessment and</u> <u>Performance Analysis Major Budget Drivers</u> for explanation of significant variances.

Reliability Assessment and Performance Analysis Program Statement of Activities

Statement of Activities and Capital Expenditures 2025 Budget and 2026 Budget Reliability Assessment and Performance Analysis

	2025 Budget		2026 Budget		/ariance (\$)	Variance %	
Funding							
ERO Funding							
ERO Assessments	\$	5,485,926	\$	5,738,709	\$	252,783	
Penalty Sanctions		86,337		85,870		(467)	
Total ERO Funding	\$	5,572,263	\$	5,824,579	\$	252,316	5%
Membership Dues		-		-		-	
Testing Fees		-		-		-	
Services & Software		-		-		-	
Workshops & Misc Revenue		-		-		-	
Interest & Investment Income		-		-		-	
Total Funding (A)	\$	5,572,263	\$	5,824,579	\$	252,316	5%
Expenses							
Personnel Expenses							
Salaries	\$	2,011,805	\$	2,018,108	\$	6,303	
Payroll Taxes		140,467		153,541		13,075	
Benefits		490,722		504,314		13,592	
Retirement Costs		213,667		202,671		(10,996)	
Total Personnel Expenses	\$	2,856,661	\$	2,878,635	\$	21,974	1%
Meeting Expenses							
Meetings & Conference Calls	\$	70,802	\$	74,340	\$	3,538	
Travel		250,100		304,500		54,400	
Total Meeting Expenses	\$	320,902	\$	378,840	\$	57,938	18%
Operating Expenses, excluding Depreciation							
Consultants & Contracts	\$	915,000	\$	928,000	\$	13,000	
Office Rent		-		-		-	
Office Costs		15,600		16,380		780	
Professional Services		-		-		-	
Miscellaneous				-	-	-	
Total Operating Expenses, excluding Depreciation	\$	930,600	\$	944,380	\$	13,780	1%
Total Direct Expenses	\$	4,108,163	\$	4,201,855	\$	93,692	2%
Indirect Expenses	\$	1,451,909	\$	1,603,233	\$	151,324	10%
Other New Organiting Events	*		¢		¢		
Other Non-Operating Expenses	\$		\$	-	\$	-	
Total Expenses (B)	\$	5,560,072	\$	5,805,088	\$	245,016	4%
Change in Net Assets (=A-B)	\$	12,191	\$	19,491	\$	7,300	60%
Fixed Asset Additions, excluding Right of Use Assets (C)	_	12,191		19,491		7,300	60%
TOTAL BUDGET (=B+C)	\$	5,572,263	\$	5,824,579	\$	252,316	5%
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$	-	\$	-	\$	-	
	<u> </u>						
FTES		10.30		11.00		0.70	7%

Training and Education Program

Program Scope and Functional Description

The NPCC Training and Education (TE) Program Area supports NERC Rules of Procedure Section 900 and other training, education, and outreach activities. The program provides:

- Education and training necessary to understand and operate the BPS.
- Outreach, education, and training on Reliability Standards, security related risks/issues, compliance topics and improvement of compliance and reliability assurance programs.

The TE program establishes and coordinates training for system operators relating to inter-Reliability Coordinator area matters, criteria, terminology, standards and operating procedures and instructions. The target audience of the System Operator training program is BPS operating personnel, including system operations personnel, operations support personnel (engineering and information technology), supervisors and managers, and training personnel.

In 2026, alongside the semiannual System Operators (SO) seminars, NPCC will host a hybrid Compliance and Reliability conference for its stakeholders. This conference aims to provide the latest and most relevant information on the development of NERC and Regional Reliability Standards and the implementation of the CMEP. The event will feature targeted breakout sessions and presentations on current industry activities, ensuring efficient information exchange between NPCC Compliance and Standards staff and stakeholders.

In collaboration with TFIST and its working groups, including NPCC Physical Security working group, NPCC will coordinate and hold an annual Cyber and Physical Security Workshop to address latest cyber and physical security topics, issues and trends and update NPCC entities associated with infrastructure security and technology.

To supplement the SO seminars, Cyber and Physical Security Workshop, and Compliance and Standards workshops, NPCC may develop webinars on specific topics pertinent to issues related to system operations, compliance program implementation, standards development, cyber or physical security threats and mitigation practices or technical issues.

Additionally, NPCC staff will continue to support and participate in the ERO Enterprise and NERC training, outreach, reliability and security engagements.

2026 Key Assumptions

The TE Program concentrates on the four key value drivers and long-term focus areas set forth in the ERO Enterprise Long-Term Strategy and the strategic reliability focus areas identified within the NPCC Long-Term Strategy.

- Build appropriate outreach, training, and education to registered entities through NERC and the Regional Entities to reduce the occurrence of known risks to reliability.
- Nurture relationships with key industry trade associations, as well as those associations representing technology, affiliated sectors, and end users to understand context and leverage their experience and reach.
- Collaborate effectively with other organizations that share the ERO Enterprise's reliability and security mission and seek and work with representatives of academia, other critical infrastructures, and international experts to broaden the ERO Enterprise's collective knowledge and awareness of current and unknown risks and strategies to address them.
- Provide the Regional perspective and support with appropriate NPCC Training and Education staff participation on selected NERC groups, including any future ERO Enterprise human performance engagements, as determined by RAPA Steering Group.

- Conduct ongoing Reliability Forum activities to collaborate with industry stakeholders and identify both opportunities and challenges for enhancing reliability through education, and guidance, particularly for the interconnection of utility scale Distributed Energy Resources (DER) on the Distribution System and Variable Energy Resources (VER) facilities on the transmission system.
- Collaborate through outreach with State and Provincial regulatory staff to identify areas where NPCC can support local policy.
- Support industry outreach activities, including anticipated sessions with State and Provincial Regulators and multiple Reliability Forums.

2026 Goals and Key Deliverables

- Conduct the 2026 Spring and Fall NPCC SO seminars.
- Continue to collaborate and share lessons learned among training staff from the NPCC RCs and utilize to make training program enhancements.
- As needed, enhance the NPCC repository of training resources and learning verification activities addressing fundamental power system topics, training methods and operation procedure training exercises, which may be shared as elements of operator training in compliance with NERC Standards PER-003 "Operating Personnel Credentials" and PER-005 "Operations Personnel Training."
- Develop virtual operational training webinars that focus on specific topics pertinent to compliance program implementation, standards development, or technical issues.
- Conduct one hybrid format Compliance and Reliability conference addressing the development of NERC and Regional Reliability Standards and CMEP implementation.
- Conduct the annual NPCC Cyber and Physical Security Workshop.
- Monitor and support activities of the Personnel Certification Governance Committee and associated sub-groups and collaborate with the NPCC CO-2 Operations Training WG and other NPCC Members' training personnel on the activities related to the reliable operation of the BPS.

NPCC staff training, and development is incorporated within each respective program area.

The Statement of Activities for this program area is shown below. See <u>Training, Education, and</u> <u>Operator Certification Program Major Budget Drivers</u> for explanation of significant variances.

Training and Education Program Statement of Activities

Statement of Activities and Capital Expenditures 2025 Budget and 2026 Budget Training and Education

	2025 Budget			2026 Budget		/ariance (\$)	Variance %
Funding							
ERO Funding							
ERO Assessments	\$	140,103	\$	382,661	\$	242,558	
Penalty Sanctions		838		4,294		3,455	
Total ERO Funding	\$	140,941	\$	386,955	\$	246,014	175%
Membership Dues		-		-		-	
Testing Fees		-		-		-	
Services & Software		-		-		-	
Workshops & Misc Revenue Interest & Investment Income		60,625		48,500		(12,125)	
Total Funding (A)	\$	201,566	\$	435,455	\$	233,889	116%
Expenses							
Personnel Expenses							
Salaries	\$	24,440	\$	135,459	\$	111,018	
Payroll Taxes	Ŧ	1,547	*	8,904	+	7,358	
Benefits		4,774		28,704		23,930	
Retirement Costs		2,577		14,331		11,754	
Total Personnel Expenses	\$	33,338	\$	187,399	\$	154,061	462%
Meeting Expenses							
Meetings & Conference Calls	\$	138,164	\$	153,350	\$	15,186	
Travel Total Meeting Expenses	\$	15,600 153,764	\$	<u>13,370</u> 166,720	¢	(2,230) 12,956	8%
rotar meeting Expenses	<u> </u>	155,764	φ	100,720	φ	12,950	0 76
Operating Expenses, excluding Depreciation	•		•		•		
Consultants & Contracts	\$	-	\$	-	\$	-	
Office Rent		-		-		-	
Office Costs Professional Services		250		200		(50)	
Miscellaneous		-		-		-	
Total Operating Expenses, excluding Depreciation	\$	250	\$	200	\$	(50)	-20%
Total Direct Expenses	\$	187,352	\$	354,319	\$	166,967	89%
Indirect Expenses	\$	14,096	\$	80,162	\$	66,065	469%
Other Nen Operating Expenses	¢		\$		\$		
Other Non-Operating Expenses	\$	-	φ	-	Þ	-	
Total Expenses (B)	\$	201,448	\$	434,480	\$	233,032	116%
Change in Net Assets (=A-B)	\$	118	\$	975	\$	856	723%
Fixed Asset Additions, excluding Right of Use Assets (C)		118		975		857	726%
TOTAL BUDGET (=B+C)	\$	201,566	¢	435,455	¢	233,889	116%
						•	110/0
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$	-	\$	-	\$	-	
FTES		0.10		0.55		0.45	450%

Situation Awareness and Infrastructure Security Program

Program Scope and Functional Description

The Situation Awareness and Infrastructure Security (SAIS) Program Area activities are performed in accordance with the NERC Rules of Procedure Section 1000 and applicable subsections of Section 800. The SAIS program is a combination of near real-time awareness of conditions on the BPS with the programs necessary to increase the physical and cyber security of the electricity infrastructure, including the operation and maintenance of tools and other support services for the benefit of Reliability Coordinators (RCs) and the system operators within the registered entities. When an event does occur, it is critical to provide a forum for active coordination of reliability and operation among the NPCC RC areas and neighboring NERC Regions. Further, NPCC's role is to gain and maintain situation awareness and understanding of system issues when they emerge and coordinate with relevant parties (typically NERC and FERC) about the conditions of the BPS and to use an event as a learning opportunity to enhance the reliability, resilience, and security of the interconnected BPS through the lessons learned, which can be gleaned from such an event.

NPCC's Event Analysis Program resides within the SAIS Program Area and supports the overall goal of promoting the reliability of the BPS in Northeastern North America and the entire North American grid.

NPCC's critical infrastructure security objectives are defined within the scope of the NPCC Task Force on Infrastructure Security & Technology (TFIST) and its Working Groups, and include, but are not limited to:

- Providing a forum for NPCC review of proposed and posted documents from the NERC Reliability and Security Technical Committee (RSTC) and its subgroups; and
- Representing NPCC's position in the activities of NERC groups involved in the development and/or implementation of physical and cyber security.

NPCC's Security Outreach program will support ERO Enterprise, and E-ISAC activities aimed at addressing known and emerging security (both cyber and physical) risks to strengthen and enhance industry security posture through active participation and engagement in the ERO Enterprise, E-ISAC and industry activities, in partnership with government and law enforcement agencies.

2026 Key Assumptions

The SAIS program concentrates on the four key value drivers and long-term focus areas set forth in the ERO Enterprise Long-Term Strategy, the strategic reliability focus areas identified within the NPCC Long-Term Strategy, and the Reliability Coordinating Committee Work Plan for calendar year 2025 - 2026.

- Use the full suite of tools, activities, and resources for risk mitigation to provide guidance to industry as to how to mitigate emerging risks, evaluating the effectiveness of such approaches.
- Maintain situational awareness of operations within the region and support NERC and FERC's efforts for situation awareness of near real-time system conditions.
- Continue to promote, implement, and manage ERO Event Analysis Process (EAP) and Cause Coding process as part of the ERO Event Analysis Program, including collection and review of disturbance reports, review and analysis of applicable, qualifying events, and development of lessons learned and cause coding of events.

- Collaborate on and support joint activities with FERC and NERC staff and other Regional staff on analysis of known and emerging risks, analysis of major events, and follow-up projects/studies based on the findings and recommendations.
- Strengthen the analysis of cyber impacts on the BPS and mitigate impacts of cyberattacks. Enhance industry's ability to develop approaches to pre-position the system when under attack and explore recovery strategies.
- Leverage information and cross-sector collaboration with other critical infrastructures that share elements of the ERO Enterprise's reliability and security mission to facilitate cross-sector information sharing and threat analysis to broaden the ERO Enterprise's collective knowledge and awareness of current and emerging risks and strategies to address them and communicate these to industry for awareness and mitigation.
- Build/enhance appropriate outreach, training, and education to registered entities through NERC and the Regional Entities to reduce the occurrence of known risks to reliability.
- Ensure the E-ISAC Long-Term Strategic Plan is executed such that the E-ISAC is viewed by industry as meeting its needs as one of its key trusted sources of security information.
- Strengthen proactive outreach, communications, relationships, and intelligence sharing with key regulatory, legislative, and policy bodies, as well as government agencies across North America (U.S. and Canada).
- Nurture relationships with key industry trade associations, as well as those associations representing technology, affiliated sectors, and end users to understand context and leverage their experience and reach.
- Collaborate with technical stakeholder groups to support development of recommendations and risk mitigating activities based on events and identified reliability and security risks.
- Support GridEx-related planning and distributed play activities.
- Provide Regional perspective and support through active participation in appropriate NERC and ERO groups and activities.
- Support DOE-led effort on the development of the North American Energy Resilience Model (NAERM) in collaboration with the National Labs, the industry, and the ERO Enterprise.
- Support NPCC and ERO Enterprise communications activities, including ERO Communications Group (EROCG) and implementation of NPCC Emergency Communications Plan and NERC Crisis Action Plan.

2026 Goals and Key Deliverables

Situation Awareness 2026 Goals and Key Deliverables

- Monitor the operational status of the BPS and coordinate normal and pre-emergency communication, awareness, and assistance in addition to the same during an emergency among the RCs within the NPCC footprint.
- Prepare daily reports and conduct daily and weekly conference calls with NPCC and neighboring RCs (MISO and PJM) to serve as a complement to the NPCC Emergency Preparedness Conference Call.
- Coordination and communication with the NERC Bulk Power System Awareness group in preparation for and during ongoing significant events in the NPCC footprint.
- Monitor the status of the BPS through the NERC Situational Awareness-FERC, NERC, Region's version 3 (SAFNRv3) tool and support efforts and work to develop and enhance the use of SAFNR and other tools to further support NPCC and ERO SA.
- Coordinate inter-regional pre-emergency actions in the event of a threat to the security of the Northeastern North American bulk power supply system.

- Review and implementation of applicable recommendations and lessons learned from the prior planning and distributed play activities in preparation for and participation in the GridEx VIII wide-area exercise.
- Participation in the ERO Enterprise-wide SA and EA activities, including NERC SA and EA Oversight Plan specified goals and deliverables in support of the activities to identify, prioritize, and assure effective and efficient mitigation of risk to the reliability and security of the North American BPS, including such activities as:
 - NERC Bulk Power Situational Awareness calls.
 - Participation in the ERO Enterprise Crisis Action Plan (CAP) tabletop exercises and enhancements to the CAP processes.
 - Participation in the ERO Enterprise CAP activations.
- Support implementation and activities of NPCC's Emergency Communications Plan.
 - Provide the Regional perspective through NPCC staff support of the NERC Reliability and Security Technical Committee and participation on the key related NERC Subcommittees, Task Forces and Working Groups, including the Event Analysis Subcommittee and the ERO EA and SA Collaboration Groups.
- Participate in and support, as appropriate, periodic ERO Enterprise SA activities (e.g., GridEx, Monitoring and Situation Awareness Workshop, NERC Alerts, Winter Collaboration Group, etc.).
- Continue to promote, implement, and manage ERO Event Analysis Process (EAP) and Cause Coding process as part of the ERO Event Analysis Program, including collection and review of disturbance reports, review and analysis of applicable, qualifying events, development of lessons learned and cause coding of events.
- Work directly with applicable NPCC Task Forces and Working Groups to provide an indepth assessment of Lessons Learned unique to the NPCC Members and NPCC Criteria and development of Regional Insights, as applicable.
- Support NPCC and ERO Enterprise studies and activities pertaining to gas-electric interdependencies, as well as other interdependent critical infrastructure sectors' risks.

Infrastructure Security 2026 Goals and Deliverables

- Provide physical and cyber security outreach and education services to registered entities.
- Monitor the Homeland Security Information Network (HSIN), E-ISAC, NERC Alerts, Canadian Information Sharing and North American Transmission Forum and share information with appropriate asset owners/operators.
- Remain current on relevant governmental agencies and Standards organizations applicable security recommendations and requirements, and other applicable security and reliability recommendations, and ensure the RCC and its committees are appropriately informed.
- Provide support and technical input for TFIST and associated Working Groups related to the BPS risks as identified by the NERC Reliability Issues Steering Committee; support, discuss and coordinate activities and approaches identified in the recommendations for mitigating security risks.
- Support NERC GridEx VIII planning and distributed play activities and after-action survey and report development.
- Review infrastructure security and technologies and provide recommendations to the RCC to enhance physical and cyber security in compliance with NERC guidelines/standards.
- Sponsor periodic workshop presentations to address timely issues and update NPCC entities associated with infrastructure security and technology.
- Provide education, awareness, and support for Cross Sector coordination in Entity agreements and response plans with focus upon Telecommunications, Water and Natural Gas, including monitoring and sharing with the E-ISAC.

- Support ERO Enterprise and industry security initiative and enhance coordination and collaboration with the ERO, E-ISAC, other NERC Regions and U.S. and Canadian applicable authorities.
- Support Physical Security Working Group activities aimed at promoting the exchange of information regarding approaches to physical security that will enhance the reliability and resiliency of the BPS and further address any physical security threats that could challenge efficient operation of the BPS. The Physical Security Working Group will also support the TFIST's work on issues related to physical security.
- Through the Telecommunications Working Group, promote and enhance the reliability of the Interconnected Power System in Northeastern North America by assessing adequacy and resilience of organizations' voice communications, and development of recommendations for mitigation of identified risks and sharing of industry best practices.
- Provide a forum for NPCC members, NPCC Task Forces and Working Groups to identify and discuss cyber security issues and practices related to the BPS, including BES cyber security topics that span one or more Task Force or Working Group.

The Statement of Activities for this program area is shown below. <u>See Situation Awareness and</u> <u>Infrastructure Security Major Budget Drivers</u> for explanation of significant variances.

Situation Awareness and Infrastructure Security Program Statement of Activities

Statement of Activities and Capital Expenditures 2025 Budget and 2026 Budget Situation Awareness and Infrastructure Security

		2025 Budget		2026 Budget	١	/ariance (\$)	Variance %
Funding		•		•			
ERO Funding							
ERO Assessments	\$	3,395,036	\$	3,844,978	\$	449,942	
Penalty Sanctions		59,514		61,671		2,157	
Total ERO Funding	\$	3,454,550	\$	3,906,649	\$	452,098	13%
Membership Dues		-		-		-	
Testing Fees		-		-		-	
Services & Software		-		-		-	
Workshops & Misc Revenue		-		-		-	
Interest & Investment Income	*	-	*		*	-	4.20/
Total Funding (A)	\$	3,454,550	\$	3,906,649	\$	452,098	13%
Expenses							
Personnel Expenses	•	4 400 070	•	4 0 4 0 0 0 0	•	400.004	
Salaries	\$	1,422,378	\$	1,616,062	\$	193,684	
Payroll Taxes		103,350		120,537		17,187	
Benefits		393,430		457,336		63,906	
Retirement Costs	_	152,954	-	171,393	•	18,439	4.40/
Total Personnel Expenses	\$	2,072,112	\$	2,365,328	\$	293,216	14%
Meeting Expenses							
Meetings & Conference Calls	\$	26,305	\$	26,000	\$	(305)	
Travel Total Meeting Expenses	\$	151,100 177,405	\$	203,160 229,160	\$	52,060 51,755	29%
i otal meeting Expenses	\$	177,405	Þ	229,160	Þ	51,755	29%
Operating Expenses, excluding Depreciation			•		•	(50.000)	2201
Consultants & Contracts	\$	190,000	\$	140,000	\$	(50,000)	-26%
Office Rent		-		-		-	
Office Costs Professional Services		5,800		6,750		950 -	
Miscellaneous		-		-		-	
Total Operating Expenses, excluding Depreciation	\$	195,800	\$	146,750	\$	(49,050)	-25%
Total Direct Expenses	\$	2,445,316	\$	2,741,238	\$	295,921	12%
Total Direct Expenses		2,445,510	φ	2,741,230	φ	295,921	12 /6
Indirect Expenses	\$	1,000,831	\$	1,151,413	\$	150,582	15%
Other Non-Operating Expenses	\$	-	\$	-	\$	-	
Total Expenses (B)	\$	3,446,147	\$	3,892,651	\$	446,504	13%
Change in Net Assets (=A-B)	\$	8,403	\$	13,998	\$	5,595	67%
Fixed Asset Additions, excluding Right of Use Assets (C)		8,403		13,998		5,595	67%
TOTAL BUDGET (=B+C)	\$	3,454,550	\$	3,906,649	\$	452,098	13%
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$	-	\$	-	\$	-	
FTES		7.10	1	7.90		0.80	11%

Administrative Services

Program Scope and Functional Description

Administrative Services support the previously identified five program areas:

- Reliability Standards;
- Compliance Monitoring and Enforcement Organization Registration and Certification;
- Training and Education;
- Reliability Assessment and Performance Analysis; and
- Situation Awareness and Infrastructure Security.

Administrative Services:

- General and Administrative;
- Legal and Regulatory;
- Information Technology;
- Human Resources; and
- Finance and Accounting.

Methodology for Allocation of Administrative Services Expenses to Programs

NPCC's total overhead expenses, such as office rent and office costs, will be charged to Administrative Services and then reallocated proportionately based on FTE to the program's as Indirect Expenses. Where applicable, operating expenses are accounted for within the related program's budget. If an expense cannot be attributed to a specific program, it is included in Administrative Services.

General and Administrative

Program Scope and Functional Description

The NPCC general and administrative function provides executive management of the corporation, enterprise risk management, internal compliance, external affairs, corporate communications, management of NPCC office, and other administrative support programs.

NPCC total overhead expenses, such as office rent and office costs, will be charged to the Administrative Services Programs and then reallocated proportionately based on FTE to the programs through Indirect Expenses.

2026 Key Assumptions

The 2026 Key Assumptions for the NPCC General and Administrative function are as follows:

- NPCC will emphasize effective execution, efficiency, and transparency with a strong culture of continuous improvement and program readiness.
- NPCC will facilitate reliability-enhancing activities.
- NPCC will continue its outreach and communication with stakeholders to promote effective reduction of risk to the BPS.
- NPCC will evolve its internal compliance and audit activities.
- NPCC will enhance public communications.

The General and Administrative Program incorporates the regional specific strategic and operating objectives set forth in the ERO Enterprise Long Term Strategy and the ERO Enterprise Operating Plan. ERO Enterprise strategic and operational objectives are considered in the development and maintenance of the NPCC Long-term Strategy on an annual basis.

2026 Goals and Key Deliverables

The NPCC General and Administrative function will support the following goals:

- Continue high-quality performance of delegated functions while maintaining an appropriate resource requirement.
- Provide pertinent and timely information to stakeholders to improve efficiency of interactions with NPCC staff.
- Manage interface with NERC enterprise-wide internal audit initiatives.
- Evolve internal compliance activities and enhance public communications to ensure consistency and effectiveness.

External Affairs

• The objective of the NPCC Public Information Committee is to disseminate and coordinate the appropriate release of information to the media, respond to related requests for information, and to coordinate public information activities with the NPCC Region, ERO Enterprise, and NERC media relations. Anticipated activities include, but are not limited to:

Media releases for NPCC Reliability Assessments.

- Preparing other NPCC media releases and statements as needed.
- Responding to media inquiries (and coordinating responses).
- Participating in the ERO Communications Group's 2026 Work Plan activities, including:
 - Information sharing/education of key audiences/stakeholders to further the ERO Enterprise's mission;
 - Coordination/planning for outreach communications and media relations;

- Consistent/coordinated outreach to support public and regulatory confidence of ERO Enterprise and its activities; and
- Coordination with the ERO Enterprise Crisis Action Plan related media activities.
- Periodic update of NPCC's Emergency Communications Plan (A Guide for Media Communications During Emergencies).
- Media Planning associated with NERC's Grid Security Exercise (GridEX VIII).

Legal and Regulatory

Program Scope and Functional Description

The Legal and Regulatory program area is responsible for providing legal and regulatory advice to the Chief Executive Officer, Board, and staff on matters that affect NPCC. This includes drafting, reviewing, and maintaining NPCC's contracts, policies and procedures, and governance documents. It includes identifying and evaluating corporate, operational, strategic, and reputational risks and ensuring legal and regulatory compliance with applicable laws, orders, rules, and regulations. It also includes oversight of outside counsel, as necessary, which may review complex matters for legal sufficiency and provide independent legal advice and guidance on certain employment and Human Resource related matters.

The Legal and Regulatory program area is also responsible for Corporate Secretary function activities such as preparing Board materials and minutes, facilitating, and conducting Board training, and ensuring that meetings of the Board of Directors and Committees adhere to the NPCC Amended and Restated Bylaws and other relevant governing documents.

The Legal and Regulatory program area also provides oversight to the CME subprogram area of CORC. This includes overseeing settlements, contested enforcement matters, and enforcement submissions or filings with FERC and other Canadian regulatory agencies.

2026 Key Assumptions

The 2026 Key Assumptions for the NPCC Legal and Regulatory function are as follows:

- NPCC will continue to support NPCC's governance structure by supporting the Board and Board committees, facilitating the selection of stakeholder and independent directors, and drafting and obtaining approval of any necessary governance documents.
- NPCC will continue to support the processing of enforcement actions through the development or oversight of settlement agreements and Notices of Penalty, leading settlement negotiations with the registered entities, and supporting enforcement filings before FERC, the Régie de l'énergie, the New Brunswick Energy and Utilities Board and other applicable governmental authorities.
- NPCC will continue to enhance its strategic engagement with policy makers and regulators in the states and provinces in the NPCC footprint to educate on what NPCC does in the areas of reliability and security, NERC and regional assessments, and reports.
- NPCC will proactively engage with NERC, FERC, and other regulatory agencies to ensure NPCC's continued recognition as a Regional Entity.

2026 Goals and Key Deliverables

The 2026 Goals and Key Deliverables for the NPCC Legal and Regulatory function are as follows:

- Work with Enforcement to support processing enforcement actions, including the documentation of settlement agreements and Notices of Penalty, through the filing process at FERC;
- Support NPCC's corporate governance needs;
- Support NPCC's corporate legal needs; and
- As applicable, work with NERC and other Regions, on updating or renewing Memorandum of Understanding or other Agreements with applicable governmental authorities.

Information Technology

Program Scope and Functional Description

The Information Technology (IT) program manages the installation, maintenance, and security control configuration of NPCC information assets and network infrastructure. IT enforces the NPCC Cybersecurity and Data Protection Program through continuous oversight and monitoring of the network and operating systems and assists the program areas by providing them the functionality needed to meet their goals, objectives, and deliverables. Additionally, IT performs threat detection and incident response by integrating robust threat detection mechanisms and implementing effective incident response protocols, to safeguard NPCC's assets and reputation.

IT manages and maintains all NPCC contracts and alerts business users of renewals, performs vendor risk assessments, and reviews all contracts in collaboration with Legal.

NPCC partners with the ERO to implement, operate and maintain software tools supporting common enterprise-wide operations. NPCC leverages ERO solutions which have been approved by the ERO Executive Committee (ERO EC), which is comprised of the senior leadership of NERC and each of the Regional Entities. NERC and the Regional Entities are committed to working collaboratively to improve operational efficiency, minimize duplication of effort, and gain efficiencies by deploying common solutions from approved vendors, where practicable.

The NERC information technology budget does not supplant NPCC's need for IT expenditures for cybersecurity, regional projects, and internal region-specific IT support needs.

The IT program includes the following functions:

- Asset Management
- Contract Management
- Help Desk
- Infrastructure Support
- Corporate Communications
- Security Operations
- Internal Governance, Risk, and Compliance

2026 Key Assumptions

NPCC's budget assumes the availability of enterprise software tools as described in NERC's business plan and budget. If implementation of these software applications is delayed or otherwise not available as planned, NPCC could incur additional costs to implement ERO Enterprise-wide programs pending the availability of these applications. The 2026 plan considers the following regional assumptions:

- NPCC staff will have seamless access to the ERO Align and Secure Evidence Locker.
- NPCC IT will support the implementation of the ERO Analytical Community of Excellence (ERO ACE) program and ERO selected energy assessment software for the Reliability

Services Program Areas, assuming the need for these projects can be served by our IT staff and do not require a dedicated database administrator.

- NPCC will actively participate in designing, planning, and implementing ERO Centralized Applications.
- NPCC IT will support external communication activities as outlined in the NPCC Long-Term Strategy.
- The cybersecurity landscape will continue to evolve and require enhanced security tools and measures to strengthen NPCC's security posture and governance activities.
- NPCC's cloud infrastructure will be maintained and optimized.
- NPCC will utilize secure third-party hosting centers for its website and network.
- NPCC will utilize third-party support for 24x7 monitoring.
- NPCC will leverage IT consulting services for project-based work to augment staff skill sets instead of increasing headcount for the support of NPCC's website and cloud network environments.
- NPCC will adhere to equipment replacement cycles (computers every three years, servers every four years, network equipment every five years).
- NPCC will collaborate with ERO to conduct a third-party Cybersecurity Benchmark assessment.
- NPCC will deploy artificial intelligence tools to boost staff and ERO capabilities.
- NPCC will actively support the ERO's Enterprise 3-Year Cybersecurity and Long-Term Strategy initiatives.
- NPCC will implement controls and update policies to align to the ERO Security Principles and industry-standard security frameworks.

2026 Goals and Key Deliverables

The IT program responsibilities encompass a variety of complex technical, administrative, and supervisory work in the development, installation, and maintenance of information technology systems. IT goals include, but are not limited to:

- Identify and implement process improvements for manual tasks associated with IT core work and prioritized business projects, incorporating secured and vetted machine learning and AI capabilities to drive efficiency through the business.
- Evaluate NPCC's existing security controls and align them with industry-standard security frameworks and the ERO Security Principles.
- Enhance NPCC's incident response capabilities and strengthen security controls.
- Strengthen NPCC's internal Security Awareness Program through education and training on social media, phishing, and other vulnerabilities that pose threats to NPCC systems.
- Maintain a robust Insider Threat Mitigation Program that includes proactive monitoring, early intervention, and reporting mechanisms to deter, detect, and mitigate risks posed by insiders.
- Develop in-house expertise, by obtaining industry recognized training and certifications to reduce the reliance on external vendors for system knowledge.
- Enhance NPCC's website and communication capabilities.
- Maintain and support the IT infrastructure for the ERO Analytical Community of Excellence (ERO ACE) program and ERO selected energy assessment software for the Reliability Services Program Areas.
- Assist the SAIS Program Area in delivering educational webinars, security bulletins, and outreach to NPCC members.
- Improve NPCC's infrastructure by upgrading various hardware components and equipment as they reach the end of life.

Human Resources

Program Scope and Functional Description

NPCC constructed an exceptional team of highly qualified employees to carry out their day-to-day activities in the Human Resources Management (HRM) function. A critical responsibility of Human Resources (HR) is to build a healthy work environment and motivate its employees at each step to promote the company's goals to ensure the organization's success. Human Resources designs, implements, and enforces policies and procedures, strategic planning, succession planning, knowledge transfer, and training and development. In addition, HR is responsible for managing the employee life cycle (i.e., recruiting, hiring, onboarding, training, and terminations), employee relations, performance management, compensation and benefits, Human Resources Information Systems (HRIS), and HR data and analytics tools all in adherence to applicable federal, state, and local laws.

2026 Key Assumptions

The Human Resources area will maintain its scope of operations from 2025. An increased number of employees drives the organization's recruitment needs, resulting in an increased workload.

2026 Goals and Key Deliverables

- Represent NPCC on the ERO People Culture and Strategy Group (PCSG) and participate in the ERO group activities to increase collaboration, transparency, and efficiency.
- Enhance employee recruiting and retention policies and practices.
- Increase the effectiveness of performance management processes.
- Amplify employee engagement activities, events, and voluntary employee resource groups.
- Manage rising benefits costs and establish competitive programs.

Finance and Accounting

Program Scope and Functional Description

The Accounting and Finance program directs the overall financial plans and accounting practices of the organization; oversees treasury, accounting, budget, tax, and audit activities; and oversees financial and accounting system controls and standards. NPCC uses a CPA firm to prepare its unaudited statements of activities and financial statements for quarterly reviews. Independent audits have consistently identified this system as a best practice.

2026 Key Assumptions

The Accounting and Finance program area will maintain its scope of operations from 2025.

2026 Goals and Key Deliverables

The objectives are to provide or obtain the financial and accounting services for NPCC and coordinate with NERC requirements:

- Participate in ERO Finance Group activities to increase collaboration and efficiency
- Utilize the NERC System of Accounts for consistency
- Utilize an accrual method of accounting for consistency with NERC in methodology
- Alignment of changes in budget and changes in aggregate assessment
- Cash Management
- Budget development using the NERC budget template format
- Forecasts and projections
- Alignment of NPCC Committees, Task Forces and Working Groups with the programs
- Payroll and expense administration
- Preparation of unaudited quarterly financial variance reports
- IRS reporting
- Annual independent audit of financial statements

Administrative Services Statement of Activities

Statement of Activities and Capital Expenditures 2025 Budget and 2026 Budget ADMINISTRATIVE SERVICES

		2025 Budget		2026 Budget	,	Variance (\$)	Variance %
Funding							
ERO Funding							
ERO Assessments	\$	(916,728)	\$	(366,480)	\$	550,248	
Penalty Sanctions		-		-		-	
Total ERO Funding	\$	(916,728)	\$	(366,480)	\$	550,248	-60%
Membership Dues		-		-		-	
Testing Fees		-		-		-	
Services & Software		-		-		-	
Workshops & Misc Revenue		-		-		-	
Interest & Investment Income	-	127,992	*	252,700	*	124,708	0.00/
Total Funding (A)	\$	(788,736)	\$	(113,780)	\$	674,956	-86%
Expenses							
Personnel Expenses							
Salaries	\$	3,866,075	\$	4,575,437	\$	709,362	
Payroll Taxes		232,184		280,262		48,078	
Benefits		846,772		1,013,915		167,144	
Retirement Costs	*	420,998	*	512,930	*	91,932	409/
Total Personnel Expenses	\$	5,366,029	\$	6,382,544	\$	1,016,516	19%
Meeting Expenses							
Meetings & Conference Calls	\$	266,324	\$	138,500	\$	(127,824)	
	_	124,750	-	193,741	•	68,991	
Total Meeting Expenses	\$	391,074	\$	332,241	\$	(58,833)	-15%
Operating Expenses, excluding Depreciation							
Consultants & Contracts	\$	90,000	\$	90,000	\$	-	
Office Rent		431,000		389,500		(41,500)	
Office Costs		1,267,978		1,379,046		111,068	
Professional Services		1,227,000		1,130,380		(96,620)	
Miscellaneous		30,000		25,000		(5,000)	
Total Operating Expenses, excluding Depreciation	\$	3,045,978	\$	3,013,926	\$	(32,052)	-1%
Total Direct Expenses	\$	8,803,080	\$	9,728,711	\$	925,630	11%
Indirect Expenses	\$	(8,803,080)	\$	(9,728,711)	\$	(925,630)	11%
		(0,000,000)		(0,720,711)		(020,000)	1170
Other Non-Operating Expenses	\$	-	\$	-	\$	-	
Total Expenses (B)	\$	0	\$	-	\$	-	0%
Change in Net Assets (=A-B)	\$	(788,736)	\$	(113,780)	\$	674,956	-86%
Fixed Asset Additions, excluding Right of Use Assets (C)		-		-		-	
TOTAL BUDGET (=B+C)	\$	0	\$	-	\$	-	0%
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$	(788,736)	\$	(113,780)	\$	674,956	-86%
FTES		17.55		19.25		1.70	10%

The Statement of Activities for the General and Administrative Service program area is shown above. See <u>Administrative Services Major Budget Drivers</u> for explanation of significant variances.

Criteria Services Division Activities

NPCC Regionally-Specific Criteria Services Overview

NPCC Criteria Services division activities are based on the development, maintenance, and retirement of regionally-specific, more stringent reliability criteria and supporting guideline or procedural documents. The requirements in NPCC Reliability Criteria apply only to those facilities defined as NPCC Bulk Power System (BPS) elements through the performance-based methodology identified in NPCC Document A-10, "Classification of Bulk Power System Elements."

In accordance with the NERC Rules of Procedure Section 313, Regional Entities may develop Regional Criteria necessary to implement, augment, or facilitate compliance with NERC Reliability Standards. Regional Criteria may also include acceptable operating or planning parameters, guides, or other documents used to enhance BPS reliability.

NPCC's Directories contain Regional Criteria which consists of requirements which provide an enhanced level of reliability to the NPCC defined BPS. These criteria impose more stringent requirements than those which appear in the NERC Reliability Standards. The Regional Criteria may also be utilized to address issues not within the scope or jurisdiction of FERC as outlined in Section 215 of the Federal Power Act, such as resource adequacy. Regional Criteria may also address Canadian Provincial reliability issues, and may include specific operating or planning parameters, guides, agreements, protocols, or other documents used to enhance the reliability of the BPS in the Region. These documents typically provide benefits by promoting more consistent implementation of the NERC Reliability Standards within the Region. These documents are not NERC Reliability Standards, or Regional Variances, and therefore are not enforceable under the authority delegated by NERC pursuant to delegation agreements.

On a periodic basis and as NERC Reliability Standards are revised or new standards are developed, NPCC performs reviews of any associated Regional Criteria for possible impact (e.g., continued need or revision). During the criteria review process NPCC's Task Forces review not only the incremental reliability benefit, but also the cost effectiveness of the criteria. In addition, as NERC Reliability Standards are enhanced, revised, and ultimately approved by the FERC some requirements of the NPCC Regional Criteria may become unnecessary in the U.S. portion of NPCC. In these situations, it is important that the criteria remain in place until such time as all NPCC's Canadian Provincial regulators adopt the NERC Reliability Standard to ensure no reliability gaps exist.

For 2026 and beyond, the potential reliability impacts of increased penetration of Distributed Energy Resources (DERs) and Variable Energy Resources (VERs) along with the changing fuel mix for generation within the NPCC footprint, warrant consideration. The Criteria Services division staff, in conjunction with the NPCC Task Forces and Working Groups have a unique opportunity to conduct reviews of these issues and develop criteria, guidelines, and procedural documents for Regionally-specific, more stringent requirements for DER, IBR and VER. Participation of the entities responsible for the DER, IBR and VER in the development of reliability documents will become more important in the future as penetration levels increase. Outreach, collaboration, and coordination of topics related to DER, IBR and VER will enable NPCC to develop guidance allowing more effective integration of these resources.

Increasing resilience of the BPS through alternative approaches to standards development using potential NPCC Regional Criteria, guidelines, and whitepapers will also be continually reviewed by NPCC's body of subject matter experts.

NPCC Criteria Services continually prioritizes the revision of its reliability criteria based on potential emerging risks.

Membership

Full members, in accordance with NPCC's Amended and Restated Bylaws, are subject to compliance with regionally-specific criteria and receive criteria-related services from the Criteria Services division.

Full Members, aside from those who perform the Balancing Authority (BA) function, are not assessed an annual membership fee. Those that perform BA functions are assessed and remit a proportional Net Energy Load (NEL) share of expenses for Criteria Services. NPCC also directly assigns Criteria Service division costs to a BA or entity, where significant costs are incurred by that BA. The funding for NPCC's Criteria Services division is approved by the NPCC Board of Directors.

Under its Criteria Services Program area, NPCC will identify for membership, those entities involved in emerging technologies to assure that those entities which have an impact on BPS reliability are included in appropriate NPCC activities.

Criteria Services Division

Program Scope and Functional Description

NPCC's Criteria Services Division leads the development of Regional Criteria that are necessary to implement, to augment, or to comply with NERC Reliability Standards, but which are not Reliability Standards. NPCC's Regional Criteria also address reliability issues not within the scope of Reliability Standards, such as resource adequacy.

NPCC's regionally-specific more stringent reliability Criteria apply to Full Members of NPCC that own or operate generation or transmission facilities for which faults or disturbances can have a significant adverse impact outside of the local area and which are identified utilizing a reliability impact-based methodology. The Criteria are documented in the NPCC Directories and, in some cases, the legacy "A" documents. The NPCC Document A-10," Classification of Bulk Power System Elements", describes the process used to determine which generation and transmission facilities must meet the Criteria.

NPCC's Criteria Services Division leads the development and implementation of the Criteria Compliance and Enforcement Program. This includes facilitating the monitoring of compliance with the Regional Criteria and the reporting of non-compliance with the Regional Criteria. This is done through the development of process documents and procedures to ensure Full Members have the means to monitor and report noncompliance with the Regional Criteria.

Strategic and Business Planning

2026 Key Assumptions

The Criteria Services division activities are expected to remain stable throughout 2026.

2026 Goals and Objectives

- Continue the review and development of the NPCC Directories containing regionallyspecific criteria, which augment or add specificity to the NERC Reliability Standards, and which clearly delineate the more stringent NPCC criteria requirements. The more stringent NPCC Regional criteria provide consistency and operational clarity while providing more robust defense in-depth, results based, criteria requirements to ensure NPCC BPS reliability.
- Review the criteria found in the NPCC Directories on a triennial basis to ensure no redundancies or inconsistencies exist.
- Retire Directories and/or criteria which have been overtaken by improved NERC standards.
- Identify opportunities to develop criteria, procedures, or guideline documents to address emerging risks associated with DER, VER and battery energy storage.
- Identify opportunities to enhance Bulk Electric System (BES) resilience with NPCC processes and documentation.
- Continually review the need to file revised and updated more stringent requirements with the New York State Department of Public Service and Canadian Provinces as applicable.
- The Criteria Services division and the CCEP Working Group (a sub-group of the Compliance Committee) will work with the various Task Forces to develop Criteria Compliance Reporting Forms for reviewing adherence to regionally-specific Criteria. The Criteria Services division and the CCEP Working Group will work with the Task Force on Coordination of Operation (TFCO), Task Force on Coordination Planning (TFCP), Task Force on System Studies (TFSS), and Task Force on System Protection (TFSP) to review criteria within each specific NPCC Directory to identify and develop them into specific reporting forms for approval.
- Continually review impact of the BES definition on Directory and criteria content and compliance reporting.
- Continually review potential impacts of Sector or NPCC organizational changes on the Directories and criteria by performing a review of enforcement and arbitration processes as needed.
- Assist Legal with preparation of revised Directories for regulatory filings with the individual Provinces in accordance with their respective MOUs and/or Agreements, as well as the State of New York Public Service Commission.
- Facilitate any requested clarifications for NPCC criteria with the necessary subject matter experts and identify any other potential opportunities for clarifications of the Criteria.

NPCC Reliability Directories Maintenance and Development

The NPCC Regional Reliability Directories were developed to demonstrate that the NPCC more stringent criteria augment, add specificity, or address issues not covered in the NERC Reliability Standards as mandated by the NERC Rules of Procedure. The conversion of NPCC's reliability criteria into Directories was undertaken to remove any redundancies with the NERC or NPCC Regional Reliability Standards and to clearly delineate the more stringent NPCC criteria requirements.

In 2026, work will continue with the maintenance, revision, or potential retirement of individual Directories to address any actual or anticipated redundancies with new or modified NERC or

NPCC Reliability Standards. The ongoing review and maintenance of the Directories will require Task Force and Criteria Services staff to support this effort and to serve as subject matter experts. NPCC will conduct internal reviews of all draft standards against regional criteria and utilize subject matter experts to identify reliability and compliance related concerns. NPCC will file the revised NPCC Directories and notifications of retirements of Directories with the Canadian governmental and/or provincial regulatory authorities within the NPCC footprint as needed, in accordance with established provincial procedures and agreements executed with NPCC.

Additionally, as NERC Reliability Standards are developed, associated Directories will be reviewed for continued need. This review will identify the incremental reliability enhancement the Directory's criteria will yield, determine if the enhancement is sufficient to warrant retention and if so, are there any potential cost-effective alternatives that may exist to achieve that enhanced level of reliability.

NPCC Operations and Planning Directories

The following Directories are expected to remain active for 2026.

Directory No.1, Design and Operation of the Bulk Power System

This Directory documents NPCC's Regionally-specific, more stringent criteria, and demonstrates coordination and consistency with all the existing NERC TPL, BAL, IRO, INT, MOD, TOP, PRC, and VAR standards. A review to revise this Directory has been ongoing to incorporate potential revisions due to DER and VER and other emerging risks. Additionally, a Roadmap to inform future revisions of Directory No. 1 has been posted on the NPCC website and will guide an anticipated review in 2026.

Directory No.2, Emergency Operations

This Directory documents NPCC's regionally-specific, more stringent criteria, and demonstrates coordination and consistency with all the existing NERC EOP and TOP standards. The NPCC Task Force on Coordination of Operation is currently reviewing this Directory with an anticipated completion in 2025.

Directory No.4, System Protection Criteria

This Directory documents NPCC's regionally-specific, more stringent system protection criteria, and demonstrates coordination and consistency with certain applicable NERC PRC standards. The Task Force on System Protection will complete a review of this Directory in 2025 and will consider recommendations for incorporating the provisions of IEEE-2800 into the criteria contained in a Whitepaper developed to provide guidance to the Task Forces during Directory reviews. The Task Force on System Protection will also consider two clarification requests on the criteria within Directory No. 4.

Directory No.5, Reserve

This Directory documents NPCC's regionally-specific, more stringent criteria, and demonstrates coordination and consistency with all the existing applicable NERC BAL, INT, and IRO standards. The NPCC Task Force on Coordination of Operation is currently reviewing this Directory with an anticipated completion in 2025.

Directory No.6, Reserve Sharing Groups

This Directory provides the requirements for NPCC Balancing Authorities to participate in a Reserve Sharing Group. The NPCC Task Force on Coordination of Operation is currently reviewing this Directory with an anticipated completion date in 2025.

Directory No.7, Remedial Action Schemes

This Directory documents NPCC's regionally-specific, more stringent criteria for application and approval of RAS. The NPCC Task Force on System Protection reviewed and revised the document in 2020 to ensure consistency with the Remedial Action Scheme PRC-012 standard. The Task Force on Coordination of Planning will review this Directory in 2025.

Directory No.8, System Restoration

This Directory documents NPCC's regionally-specific, more stringent criteria which each applicable entity must plan for and perform power system restoration following a major or a total blackout and demonstrates coordination and consistency with applicable NERC EOP standards. The NPCC Task Force on Coordination of Operation initiated a review and revision of this Directory in 2021. Recommendations for incorporating the provisions of IEEE-2800 into the criteria are contained in a Whitepaper developed to provide guidance to the Task Forces during Directory reviews. These recommendations will consider the changing resource mix and the impact on entity restoration plans.

2026 Business Plan and Budget

Directory No.11, Disturbance Monitoring Equipment

This Directory documents NPCC's regionally-specific, more stringent criteria, and demonstrates coordination and consistency with certain existing NERC PRC standards. The NPCC Task Force on System Protection developed Directory No.11 to facilitate the retirement of the NPCC Regional Standard PRC-002-NPCC-1.

Criteria Services Goals and Statements of Activities NPCC Criteria Compliance and Enforcement Program (CCEP)

The CCEP monitors Full Members of NPCC for compliance on a subset of the regionally-specific NPCC Criteria that are unique to the NPCC BPS. In 2026, there will be aspects of the Criteria monitored as part of the annual CCEP Implementation Plan.

Through NPCC Staff oversight, the stakeholder Compliance Committee (CC) supports the annual implementation of the CCEP via the NPCC CCEP Process Document (CCEP-1). A sub-group of CC members develops the annual CCEP Implementation Plan for approval by the full CC and acceptance by the RCC. The full CC reviews the returned certification forms, and NPCC staff develops an annual assessment report that summarizes the certification results where any recommendations on non-compliances are then presented to the RCC.

Upon RCC acceptance, instances of noncompliance result in a summary notification from the CC Chair to the Compliance Executive of the offending Full Member and to the NPCC President and CEO.

Please see the CCEP section of the <u>NPCC website</u> for more information.

Criteria Services Funding Sources

The proposed 2026 Criteria Services budget of \$1,254,592 represents an increase of \$35,439 or 2.9% over the 2025 budget. The proposed Criteria Services membership fees of \$1,062,980 represents an increase of \$80,312 or 8.2% over the 2025 membership fees. Increase in membership fees is greater than increase in budget due to lower utilization of reserves to offset membership fees in 2026 than in 2025.

Major Drivers

• **Personnel** expenses increase of \$36,967 due to an average salary increase of 3.5% including merit increase and any promotions or adjustments. Decrease of 0.10 FTE due to a reorganization during 2025.

Criteria Service Statement of Activities

Statement of Activities CRITERIA SE	RVICE	es divisio	N			
		2025 Budget		2026 Budget	Variance \$	Variance %
unding		Duuget		Duuget	 Ψ	70
ERO Funding						
ERO Assessments	\$	-	\$	-	\$ -	
Penalty Sanctions		-		-	-	
Total ERO Funding	\$	-	\$	-	\$ -	
Membership Dues		982,668		1,062,980	80,312	
Testing Fees		-		-	-	
Services & Software		-		-	-	
Workshops & Misc Revenue		-		-	-	
Interest & Investment Income		6,008		13,300	7,292	
otal Funding (A)	\$	988,676	\$	1,076,280	\$ 87,604	9%
xpenses						
Personnel Expenses						
Salaries	\$	539,483	\$	549,852	\$ 10,369	
Payroll Taxes		39,662		40,980	1,318	
Benefits		108,836		132,007	23,172	
Retirement Costs		55,460		57,569	2,109	
Total Personnel Expenses	\$	743,441	\$	780,408	\$ 36,967	5%
Meeting Expenses						
Meetings	\$	11,718	\$	8,000	\$ (3,718)	
Travel		48,800		52,403	3,603	
Total Meeting Expenses	\$	60,518	\$	60,403	\$ (116)	0%
Operating Expenses, excluding Depreciation						
Consultants & Contracts	\$	15,000	\$	15,000	\$ -	
Office Rent		-		-	-	
Office Costs		2,100		1,750	(350)	
Professional Services		-		-	-	
Miscellaneous otal Operating Expenses, excluding Depreciation	\$	17,100	\$	- 16,750	\$ - (350)	-2%
Total Direct Expenses	\$	821,059	\$	857,561	\$ 36,502	4%
Indirect Expenses	\$	394,694	\$	393,521	\$ (1,173)	0%
Other Non-Operating Expenses	\$	-	\$	-	\$ -	
otal Expenses (B)	\$	1,215,753	\$	1,251,082	\$ 35,329	3%
Change in Net Assets (=A-B)	\$	(227,077)	\$	(174,801)	\$ 52,276	
ixed Asset Additions, excluding Right of Use Assets (C)		3,400		3,510	110	3%
OTAL BUDGET (=B+C)	\$	1,219,153	\$	1,254,592	\$ 35,439	3%
OTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$	(230,477)	\$	(178,311)	\$ 52,166	-23%
TES						

Personnel Analysis

Total FTEs by Program Area	2025 Budget	2026 Budget Direct FTES	2026 Budget Shared FTES	2026 Budget Total FTES	Change from 2025 Budget
Criteria Services	CRITERIA SERVICES DIVISION	0.00	2.70	2.70	-0.10
Total FTEs Criteria Services Division	2.80	0.00	2.70	2.70	-0.10

¹A shared FTE is defined as an employee who performs both Regional Entity and Criteria Services division functions.

Criteria Services Reserve Analysis

Working Capital a	and Operating Reserve A	Analysis 2025-2026	
CF	RITERIA SERVICES DIVIS	ION	
	Total Reserve	Working Capital	Operating Reserve
Beginning Total Reserve, December 31, 2024	601,804	504,272	97,532
2025 Non-Statutory Funding (from members)	982,668	982,668	
Plus: 2025 Other funding sources	20,000	20,000	
Less: 2025 Projected expenses & fixed asset additions	(1,219,153)	(1,219,153)	
Remaining Business Continuity Reserves released into Working Capital	0		
Projected Total Reserve, December 31, 2025	385,319	287,787	97,532
			· · · ·
Desired Total Deserves, Deserves of 0000	040.004	110.010 1	400.007.2
Desired Total Reserve, December 31, 2026	213,281	112,913 ¹	100,367 ²
Less: Projected Total Reserve, December 31, 2025	(385,319)	(287,787)	(97,532)
la anno 1/1 anno 1/1 anno 1/1 fa anhiann da ina 1 Tatal Daarna	(170,000)	(474.070)	0.005
Increase(decrease) in assessments to achieve desired Total Reserve	(172,038)	(174,873)	2,835
	4 054 500		
2026 Funding requirement for expenses and fixed asset additions	1,254,592		
Less: Other Funding Sources	(13,300)		
Adjustment to Operating Reserve to achieve desired Total Reserve balance ²	2,835		
Adjustment to Wokring Capital to achieve desired Total Reserve balance	(174,873)		
2026 Funding and reserve requirement	1,069,253		

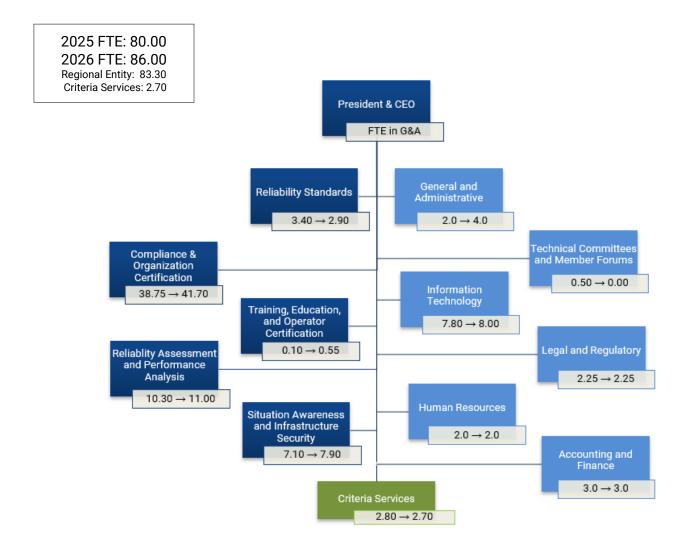
¹ Working Capital must be within a range from 8% to 25% of Budget. \$112,913 represents 9% of the 2026 budget of \$1,254,592.
 ² Operating Reserve must equal 8% of Budget. \$100,367 represents 8% of the 2026 budget of \$1,254,592.

Explanation of Changes in Reserve Policy from Prior Year

There was no change to the existing Working Capital and Operating Reserve Policy

Appendix A - NPCC Organizational Chart

Changes in Budgeted FTE by Program Area





Appendix B - Acronyms

Acronym	Definition
AI	Artificial Intelligence
BAA	Balancing Authority Area
BEP	BES Exception Process
BES	Bulk Electric System
BPS	Bulk Power System
CAI	Compliance Audits and Investigations
CC	Compliance Committee
CCEP	Criteria Compliance and Enforcement Program
CDAA	CMEP Data Administration Application
CEH	Continuing Education Hour
CF	
	Compliance Fundementals
CGNC	Corporate Governance and Nominating Committee
CME	Compliance Mitigation and Enforcement
CMEP	Compliance Monitoring and Enforcement Program
COP	Compliance Oversight Plan
CORC	Compliance Monitoring and Enforcement and Organization Registration and Certification Program
CORES	Centralized Organization Registration ERO System
CUG	Consortium Users Group
DADSWG	Demand Response Availability Data System Working Group
DER	Distributed Energy Resources
DHS	Department of Homeland Security
DOE	Department of Energy
EAP	ERO Event Analysis Process
EIC	Evaluation of Internal Controls
E-ISAC	Electricity Information Sharing and Analysis Center
EPHPIS	Electric Power Human Performance Improvement Symposium
ERAG	Eastern Interconnection Reliability Assessment Group
ERO	Electric Reliability Organization
FAC	Finance and Audit Committee
FERC	Federal Energy Regulatory Commission
FFT	Find, Fix, Track and Report
GADSWG	Generating Availability Data System Working Group
GMD	Geomagnetic Disturbance
HQCMÉ	Hydro-Québec Contrôle des mouvements d'énergie
HSIN	Homeland Security Information Network
IESO	Independent Electricity System Operator
IRA	Inherent Risk Assessment
IRPTF	Inverter-Based Resource Performance Task Force
ISO	Independent System Operator
LMTF	Load Modeling Task Force
LSE	Load Serving Entity
MACD	Market Assessment and Compliance Division
MDCC	Management Development and Compensation Committee
MIDASWG	Misoperation Information Data Analysis System Working Group
MMWG	Multi-Regional Modeling Working Group
MOU	Memorandum of Understanding
NAERM	North American Energy Resilience Model
NAESB	North American Energy Standards Board
NATE	North American Transmission Forum
NBEUB	New Brunswick Energy and Utilities Board
NBMG	Node Breaker Modeling Group
NDIVIG	Note breaker modeling Group

Acronym	Definition
NCCIC	National Cybersecurity and Communications Integration Center
NEL	Net Energy for Load
NERC	North American Electric Reliability Corporation
NLH	Newfoundland and Labrador Hydro
NOI	Notice of Inquiry
NOPR	Notice of Proposed Rulemaking
NPCC	Northeast Power Coordinating Council, Inc.
NSPI	Nova Scotia Power Incorporated
NSUARB	Nova Scotia Utility and Review Board
OEB	Ontario Energy Board
ORCG	Organization Registration and Certification Group
PAS	Performance Analysis Subcommittee
PAWG	Probabilistic Assessment Working Group
PC	Pension Committee
PJM	Pennsylvania-Jersey-Maryland Interconnection LLC., Regional Transmission Organization
PPMVTF	Power Plant Model Verification Task Force
PSWG	Physical Security Working Group
QCMEP	Québec Reliability Standards Compliance Monitoring and Enforcement Program
RAPA	Reliability Assessment and Performance Analysis
RAPA-SG	ERO RAPA Steering Group
RAS	Reliability Assessment Subcommittee
RAS	Remedial Action Scheme
RC	Reliability Coordinator
RCC	Reliability Coordinating Committee
RISC	Reliability Issues Steering Committee
RSC	Regional Standards Committee
RSTC	Reliability and Security Technical Committee
RTWG	Reliability Training Working Group
RTO	Regional Transmission Organization
SAFNR	Situational Awareness-FERC, NERC, Regions
SAIS	Situation Awareness and Infrastructure Security
SAMS	System Analysis and Modeling Subcommittee
SAR	Standards Authorization Request
SCPS	Standards Committee Process Subcommittee
SDT	Standards Drafting Team
SPCS	System Protection and Control Subcommittee
SMS	Synchronized Measurement Subcommittee
SPIDERWG	System Planning Impacts from Distributed Energy Resources Working Group
SPS	Special Protection Systems
TADSWG	Transmission Availability Data System Working Group
TFCO	Task Force on Coordination of Operation
TFCP	Task Force on Coordination of Planning
TFE	Technical Feasibility Exception
TFIST	Task Force on Infrastructure Security and Technology
TFSP	Task Force on System Protection
TFSS	Task Force on System Studies
UFLS	Underfrequency Load Shedding