NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Reliability Standards Compliance Dates for Generator Owners & Generator Operators

Inverter-Based Resource Registration Initiative Supplemental Q1 2025

Purpose

The North American Electric Reliability Corporation (NERC) Staff has prepared this document in support of the continued Inverter-Based Resource (IBR)[1] Registration Initiative. Information herein is intended to provide awareness to those non-Bulk Electric System (BES) IBR owners and operators that meet the recently approved registration criteria for Generator Owners (GOs) and Generator Operators (GOPs); commonly referred to as "Category 2 IBR." Further, this document includes all finalized and pending compliance dates for the applicability and enforceability of individual Reliability Standards applicable to Category 2 registration.

Maintenance and Updates

This document shall be maintained by NERC Standards Development, in collaboration with Registration, Compliance, Engineering, and Legal. It will be updated to align with the release of the quarterly IBR work plan information filing directed by the Federal Energy Regulatory Commission (FERC). Additionally, each release may be distributed or shared through traditional communication channels implemented by NERC and its Regional Entities. Information regarding each release can be reviewed in the Revision History section of this document.

Background of Initial Analysis

NERC Staff conducted a review of all active Reliability Standards in October 2023 to evaluate their potential applicability and enforceability to Category 2 IBR. In planning for this assessment, NERC identified that many of the active Reliability Standards refer to defined terms that could present significant challenges for the applicability of the Reliability Standards to all potential GO and GOP IBRs. In particular, multiple Reliability Standards use the term "BES" or use other defined terms in the NERC Glossary of Terms[2] that reference the BES. This exclusionary language created instances whereby Category 2 IBRs were excluded from applicability of certain Reliability Standards. Therefore, NERC staff conducted a more thorough review of each Reliability Standard and requirement for the potential introduction of reliability gaps, compliance gaps, or ambiguity that could lead to unacceptable discrepancies in implementation due to the exclusionary language.

[1] As defined by the NERC Glossary of Terms, Inverter-based Resource pertains to: A plant/facility consisting of individual devices that are capable of exporting Real Power through a power electronic interface(s) such as an inverter or converter, and that are operated together as a single resource at a common point of interconnection to the electric system. Examples include, but are not limited to, plants/facilities with solar photovoltaic (PV), Type 3 and Type 4 wind, battery energy storage system (BESS), and fuel cell devices.

[2] Glossary of Terms Used in NERC Reliability Standards; https://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary_of_Terms.pdf; last updated January 7, 2025

In the Summer of 2024, NERC Staff reaffirmed this analysis and performed an update; accounting for newly effective and retired Reliability Standards. At the time of review, only eight Reliability Standards were deemed applicable and enforceable after the completion of Project 2024-01[3], which focused on aligning the Rules of Procedure Definitions for GOs and GOPs. Importantly, this process did not necessitate any changes to the language of the standards regarding exclusionary defined terms or other related issues. [4]

Additional Reliability Standards Subject to Compliance

As detailed through updates resulting from the IBR Registration Initiative webinars and supplemental materials, all other Reliability Standards applicable to GOs and GOPs, beyond those eight identified in the analysis, would require modifications prior to becoming applicable to Category 2 IBRs and enforceable. While NERC Staff maintains a list of all Reliability Standards applicable to GOs or GOPs, each Reliability Standard will be individually assessed to establish applicability to Category 2 IBRs and be processed through the NERC Standards Development process; using open and transparent commenting and ballot periods.

Apart from responding to FERC directives (such as FERC Order No. 901), NERC Staff has not independently determined that each additional Reliability Standard applicable to GOs or GOPs must be revised to include applicability to Category 2 IBRs. Additional technical conferences will be pursued to assist in identifying which Reliability Standards must be revised to establish applicability to Category 2 IBRs and in which order and grouping they should be developed.

[3] Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner & Generator Operator)
[4] Reliability Standards identified as a result of the analysis included: BAL-001-TRE-2, IRO-010-5, MOD-032-1, PRC-012-2, PRC-017-1, TOP-003-6.1, VAR-001-5, and VAR-002-4.1

Reliability Standard Compliance Dates

The following table includes the full list of Reliability Standards that are currently active or with a pending effective date that apply to GOs or GOPs. Compliance dates will be determined by regulatory approval date and should be updated by NERC staff.

Reliability Standard	Standards Project # For Inclusion of Cat 2	Status	Effective Date of Standard	Category 2 IBR Compliance Date
CIP-002	-	Requires Modification	-	-
CIP-003	-	Requires Modification	-	-
CIP-012	-	Requires Modification	-	-
COM-001	-	Requires Modification	-	-
COM-002	-	Requires Modification	-	-
EOP-004	-	Requires Modification	-	-
EOP-012	-	Requires Modification	-	-
FAC-002	-	Requires Modification	-	-
FAC-008	-	Requires Modification	-	-
MOD-025	-	Requires Modification	-	-
MOD-026-1	Project 2020-06	In Development	-	-
MOD-027	-	Requires Modification	-	-
MOD-032-2	Project 2022-02	In Development		
MOD-033-2	Project 2021-01	In Development	-	-
PRC-002	-	Requires Modification	-	-
PRC-004	-	Requires Modification	-	-
PRC-019	-	Requires Modification	-	-
PRC-025	-	Requires Modification	-	-
PRC-027	-	Requires Modification	-	-
PRC-028-1	Project 2021-04	Approved	4/1/2025	7/1/2026
PRC-029-1	Project 2020-02	Pending FERC Approval	Pending FERC Approval	Pending FERC Approval
PRC-030-1	Project 2023-02	Approved	TBD	TBD
TOP-001	-	Requires Modification	-	-

The Reliability Standards listed below are currently active and enforceable. As part of the initial analysis as listed above, the table below shows those Reliability Standards that do not require any modifications to be considered applicable and enforceable for Category 2 IBR. Implementation for the changes in definitions for Generator Owner and Generator Operator, including for the below eight Reliability Standards, are defined through Project 2024-01 Rules of Procedure Definitions Alignment GO and GOP.

Reliability Standard	Standards Project # For Inclusion of Cat 2	Status	Effective Date of Standard	Category 2 IBR Compliance Date
BAL-001-TRE	Project 2024-01	Approved	7/1/2020	Pending FERC Approval of GO/GOP Definitions
IRO-010-5	Project 2024-01	Approved	7/1/2025	Pending FERC Approval of GO/GOP Definitions
MOD-032-1	Project 2024-01	Approved	7/1/2015	Pending FERC Approval of GO/GOP Definitions
PRC-012-2	Project 2024-01	Approved	1/1/2021	Pending FERC Approval of GO/GOP Definitions
PRC-017-1	Project 2024-01	Approved	4/1/2017	Pending FERC Approval of GO/GOP Definitions
TOP-003-6.1	Project 2024-01	Approved	7/1/2025	Pending FERC Approval of GO/GOP Definitions
VAR-001-5	Project 2024-01	Approved	1/1/2019	Pending FERC Approval of GO/GOP Definitions
VAR-002-4.1	Project 2024-01	Approved	9/26/2017	Pending FERC Approval of GO/GOP Definitions

Revision History

Version	Date	Action	Change Tracking
1.0	3/17/2025	Initial Draft	n/a