



As part of its [Inverter-Based Resource Strategy](#), NERC is dedicated to identifying and addressing challenges associated with integration of more inverter-based resources (IBR) onto the bulk power system (BPS) as the penetration of these resources continues to increase. ERO Enterprise assessments identified a reliability gap associated with this significant level of BPS-connected IBR owners and operators that are not yet required to register with NERC or adhere to its Reliability Standards. In response, FERC issued an [order](#) in 2022 directing NERC to identify and register owners and operators of currently unregistered BPS-connected IBRs. Working closely with industry and stakeholders, NERC is executing a FERC-approved work plan to achieve these directives by 2026.

2024 First Quarter Update

In Phase 1 of the IBR Registration Initiative, NERC worked with the Regional Entities to develop potential Rules of Procedure (ROP) revisions that would result in materially impactful IBRs becoming subject to NERC's Reliability Standards, proportionate to the amount of BPS-impactful synchronous resources currently subject to these standards.

Key Activities

Legal

NERC's Board of Trustees approved the [proposed revisions to the NERC ROP](#) in February, and NERC filed them with Federal Energy Regulatory Commission (FERC) for approval on March 19. In its filing, NERC requested expedited treatment of its proposals, asking for FERC to take action by approximately June 19, 2024. FERC set a comment deadline of April 18, 2024. NERC and the Regional Entities are also preparing a quarterly IBR work plan update for filing with FERC in May.

Registration

In the filing, NERC proposed revising its Registry Criteria under the ROP to include owners and operators of non-Bulk Electric System (BES) IBRs that are interconnected to the BPS and have a material aggregate impact on BES reliability. To address the impact on reliability, the revised Generator Owner (GO) and Generator Operator (GOP) Registry Criteria would include owners and operators of non-BES IBRs that either have or contribute

to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV (i.e., Category 2 GO and Category 2 GOP). Aggregation of capacity at a common point of connection would be consistent with how aggregate nameplate capacity is determined for dispersed power-producing resources that fall within Inclusion I4 of the BES Definition.

Upon FERC approval, NERC will begin specific outreach to unregistered GOs who have been identified as meeting the revised criteria and currently registered GOs to ensure their awareness of the changes to the Registry Criteria.

Standards

NERC continues to adjust Reliability Standards project priorities to ensure a focus on high-priority projects and the appropriate distribution of available resources. In addition to directing the registration of IBRs in 2022, FERC

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directed NERC to develop Reliability Standards in specific topic areas related to IBRs in late 2023. The directives, found in [FERC Order No. 901](#), call for the development of Reliability Standards addressing multiple aspects of operations and planning for IBRs in three phases due November 2024, November 2025, and November 2026. NERC’s strategy for developing the directed Reliability Standards is found in NERC’s [Order No. 901 work plan](#). At the end of Q1, additional drafts for projects related to Milestone 2 of NERC’s work plan to FERC Order No. 901 were posted, which includes a broad set of FERC directives requiring modified or new Reliability Standards to account for IBR performance. Additional modified or new projects are anticipated over the next few months to account for Milestones 3 and 4 of the NERC 901 work plan. More information is available on the [Standards Under Development](#) web page.

Also upon FERC approval, any new Standard Authorization Requests needed to account for the changes to the NERC

ROP will be brought forward. Projects will continue to be adjusted accordingly if any revisions to the applicability sections of particular NERC Reliability Standards are needed. For more information on IBR-related efforts in Standards Development, please contact [Alison Oswald](#) or [Jamie Calderon](#).

Stakeholder Outreach

In January, the quarterly trades meeting included a discussion of the IBR Registration Initiative and additional industry engagement. Further updates and discussion occurred at NERC’s February Board of Trustees meeting. On March 7, NERC provided a briefing for CAMPUT’s Mandatory Reliability Standards Committee, representing regulatory staff responsible for compliance monitoring and enforcement activities in Canada. NERC has engaged with NARUC leadership and the Regional Entities to conduct educational webinars for states and provinces in the second quarter of 2024.

Resources

NERC has launched several resources to ensure industry and stakeholders are kept informed throughout this critical, three-phase project. These include the [IBR Registration Initiative Quick Reference Guide](#) (housed under the Initiatives tab on NERC’s website), project milestones, updated FAQs and guides for new entities, and quarterly updates. As needs are identified, NERC will produce additional fact sheets and educational materials to integrate new entrants into the broader ERO Enterprise model. Please visit the [NERC](#) and the [Electricity Information Sharing and Analysis Center](#)

(E-ISAC) websites to learn more about their critical reliability and security work. Additionally, the following Regional Entities also have IBR Registration Initiative information available:

- [MRO](#)
- [ReliabilityFirst](#)
- [SERC](#)
- [Texas RE](#)

IBR Registration Milestones

Phase 1: May 2023–May 2024

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

Phase 2: May 2024–May 2025

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

Phase 3: May 2025–May 2026

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

