UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation	**)** **)**	**Docket No. RD22-4-001**

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION INVERTER BASED RESOURCES WORK PLAN PROGRESS UPDATE

On May 18, 2023, the Federal Energy Regulatory Commission ("Commission"), issued an order ("Order")[1] approving the North American Electric Reliability Corporation ("NERC") Work Plan filed on February 15, 2023, as amended on March 13, 2023,[2] to address registration of Inverter-Based Resources ("IBRs") that are connected to the Bulk-Power System ("BPS") but not within NERC's definition of the bulk electric system ("BES") (referred to hereafter as "unregistered IBRs").[3] As directed in the Order and prior IBR Order,[4] NERC hereby submits the second progress update on activities by the ERO Enterprise (NERC and the Regional Entities[5]) to execute the Work Plan and initiate revisions to the NERC Registry Criteria[6] to address owners and operators of unregistered IBRs that, in the aggregate, have a material impact on BPS reliability. As detailed below, NERC posted proposed Registry Criteria revisions on the NERC website in September, is reviewing comments, and has begun efforts to identify candidates for registration.

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1 *Order Approving Registration Work Plan*, 183 FERC ¶ 61,116 (2023) [hereinafter *Order*]; and *Registration of Inverter-Based Resources,* 181 FERC ¶ 61,124 (2022) [hereinafter *IBR Order*] (directing the Work Plan).

2 *N. Am. Elec. Reliability Corp*., Docket No. RD22-4-001 (Feb. 15, 2023) [hereinafter *Work Plan Filing*].

3 *See* NERC, Glossary of Terms Used in NERC Reliability Standards, (updated Mar. 29, 2022), https://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary_of_Terms.pdf (NERC Glossary). The BES definition is a subset of the BPS. Reliability Standards support an adequate level of reliability of the BES. *Revisions to Elec. Reliability Org. Definition of Bulk Elec. Sys. & Rules of Proc.*, Order No. 773, 141 FERC ¶ 61,236 (2012), *order on reh'g,* Order No. 773-A, 143 FERC ¶ 61,053 (2013), *rev'd sub nom*. *People of the State of N.Y. v. FERC*, 783 F.3d 946 (2d Cir. 2015).

4 *Order* at PP 21 and 35; *IBR Order* at P 52 (directing NERC to provide Work Plan updates every 90 days detailing NERC's progress toward identifying and registering owners and operators of unregistered IBRs).

5 The Regional Entities are (i) Midwest Reliability Organization ("MRO"); (ii) Northeast Power Coordinating Council, Inc. ("NPCC"); (iii) ReliabilityFirst Corporation ("ReliabilityFirst"); (iv) SERC Reliability Corporation ("SERC"); (v) Texas Reliability Entity, Inc. ("Texas RE"); and (vi) Western Electricity Coordinating Council ("WECC").

6 The Registry Criteria are within NERC's Rules of Procedure ("ROP"). Per ROP Appendices 5A and 5B, owners, operators, or users of the BPS are candidates for Registration in the NERC Compliance Registry.

I. REVISIONS POSTED TO RULES OF PROCEDURE AND INDUSTRY OUTREACH

As described in the *Work Plan Filing* and the first progress update,[7] NERC engaged in extensive stakeholder outreach as it considered approaches to address unregistered IBRs as directed by the Commission. The draft revisions posted would update Appendices 2, 5A, and 5B to the NERC Rules of Procedure ("ROP"), to support revisions to the NERC Registry Criteria to address IBRs with potential to materially affect reliability of the BES. The posted draft approach would apply to unregistered IBRs that (1) aggregate nameplate capacity to 20 MVA and greater connected at a common point of connection; and (2) connected at a voltage of 60 kV and above. The proposed revisions align with the anticipated elements laid out in the *Work Plan Filing* and first update.

NERC posted the proposed ROP revisions on its webpage from September 13, 2023 through October 30, 2023. The posting included a clean and redline of ROP Appendices 2, 5A, and 5B, as well as a summary document detailing the revisions and justifications. Prior to the posting, NERC hosted an informational webinar on July 12, 2023.[8] In parallel with this posting, NERC also issued a series of supporting materials to aid in understanding. These materials included a summary of the proposed revisions, an overview of frequently asked questions, a quick reference guide for new candidates, and a webinar as part of the IBR webinar series. This information is available on the Registration page of NERC's website.[9]

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[7] *See Work Plan Filing*, *supra* note 2; *N. Am. Elec. Reliability Corp.*, Docket No. RD22-4-001 (Aug. 16, 2023).

[8] This webinar was the tenth in an ongoing series on the IBR Registration project. More information can be found on the Inverter-Based Resource Performance Subcommittee ("IRPS") webpage here, https://www.nerc.com/comm/RSTC/Pages/IRPS.aspx.

[9] *Available at*, Organization Registration and Organization Certification (nerc.com).

Since the last Work Plan update and since posting the proposed revisions, NERC and the Regional Entities have continued outreach with stakeholders, including potential new entrants if Registry Criteria revisions move forward. These outreach engagements have included, for example, the following:

- On September 28, 2023, NERC staff presented on the IBR Work Plan to the Western Interconnection Compliance Forum ("WICF") New Standards Implementation ("NSI") Focus Group Meeting. Also, on October 4, 2023, NERC staff presented to the WICF-NSI IBR Focus Group Meeting.

- On October 5 and October 13, 2023, NERC staff met with The Solar Energy Industries Association ("SEIA") to discuss the draft revisions.

- On October 10-12, 2023, NERC hosted the North American Generator Forum ("NAGF") Annual Compliance Conference at its Atlanta office. NERC staff presented to the forum on the IBR Work Plan.

- NERC staff presented the proposed ROP changes at the October 11-12, 2023 meeting of the Compliance and Certification Committee ("CCC") [10] and the Organization Registration and Certification Subcommittee ("ORCS").[11]

- On October 19, 2023, NERC staff presented an update on the Work Plan and its Canadian impacts to the Canadian Association of Members of Public Utility Tribunals ("CAMPUT").

II. REVIEW OF COMMENTS AND NEXT STEPS

NERC continues to execute the Work Plan as detailed in the previous filings in this docket. This section gives an update on the status of the Work Plan and next steps. NERC staff is currently reviewing comments submitted on the mid-September ROP posting. There were 18 comments submitted, with several comments in support of the proposal and certain comments raising questions regarding the draft revisions and their implementation. NERC appreciates stakeholder

[10] NERC, *CCC Meeting Agenda Package*, https://www.nerc.com/comm/CCC/Agenda%20Highlights%20and%20Minutes%202013/Compliance%20and%20Certification%20Committee%20Meeting%20Agenda%20Package%20October%202023.pdf.

[11] NERC, *ORCS Meeting Agenda Package*, Agenda Item 3 (NERC Activities Related to Inverter-Based Resources), https://www.nerc.com/comm/CCC/Organization%20Registration%20and%20Certification%20Sub1/Organization%20Registration%20and%20Certification%20Subcommittee%20Agenda%20Package%20October%202023.pdf.

comments on the ROP posting. To permit time to review comments, incorporate any updates to the draft proposal, and respond to stakeholder questions, NERC plans to present draft Registry Criteria revisions and a Consideration of Comments matrix to the NERC Board of Trustees ("Board") in February of 2024. Subject to Board approval, NERC plans to file its proposed ROP revisions to modify the Registry Criteria in February of 2024.

In addition, NERC staff plans to present an initial triage reviewing Reliability Standards likely to apply to new Generator Owner/Generator Operators of Inverter Based Resources (GO-IBR and GOP-IBRs) at the Reliability and Security Technical Committee ("RSTC") meeting on on December 7, 2023. This discussion will facilitate further evaluation with stakeholders of: (i) Reliability Standards that could immediately apply to newly registered entities if the Registry Criteria are filed and accepted; and (ii) potential revisions to Reliability Standards to expand requirements to apply to the new functions under the proposed Registry Criteria. Any modifications to Reliability Standards would occur in accordance with the Standard Processes Manual under Appendix 3A of the ROP. NERC will seek stakeholder feedback on this triage to support this additional analysis.

Finally, ERO Enterprise staff will continue reaching out to stakeholders to address questions and support the transition of owners and operators of unregistered IBRs to NERC processes. This will include supporting stakeholder integration into the Reliability Standards development process.

III. CONCLUSION

The ERO Enterprise looks forward to continuing to work with industry stakeholders and the Commission to: (i) develop Registry Criteria that address owners and operators of unregistered IBRs, and (ii) later integrate new registrants subject to Commission approval of the eventual ROP

filing in this proceeding. As stated above, NERC plans to submit the proposed ROP revisions to the NERC Board in February of 2024. The attached, updated, Work Plan reflects the ERO Enterprise's intended program for preparing, filing, and implementing ROP revisions to address registration of the owners and operators of unregistered IBRs. (**Attachment 1**) The attached Communication Plan filed reflects the ERO Enterprise's program for continued stakeholder coordination. (**Attachment 2**) For the reasons set forth above, NERC respectfully requests that the Commission accept this Work Plan update.

Respectfully submitted,

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Date: November 14, 2023

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding. Dated at Washington, D.C. this 14th day of November 2023.

/s/ Candice Castaneda

Candice Castaneda
Counsel for the North American Electric Reliability Corporation

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Attachment 1

NERC Work Plan Progress Update
November 14, 2023

Registration of Inverter Based Resources – Docket No. RD22-4-000
NERC Work Plan Progress Update
November 14, 2023

On November 17, 2022, in order to respond to concerns regarding the reliability impacts from inverter-based resources (IBRs)[1] on the Bulk Power System[2] (BPS), the Federal Energy Regulatory Commission (FERC or Commission) directed the North American Electric Reliability Corporation (NERC) to submit a work plan to address registration of IBRs.[3] Regulatory consideration differs based on whether the IBRs meet NERC's Bulk Electric System (BES) definition and are registered with NERC for compliance purposes (registered IBRs), whether the IBRs are connected directly to the BPS but are not registered with NERC (unregistered IBRs), or whether the IBRs are distributed energy resources (i.e. connected to the distribution system) (IBR-DER). The Commission directed NERC to file a Work Plan within 90 days detailing how the ERO Enterprise plans to identify and register owners and operators of unregistered IBRs.

The Commission stated that the work plan should include the following:

- Explanation of how NERC will modify its processes to address unregistered IBRs (whether by working with stakeholders to change the BES definition, a change to its registration program, or some other solution) within 12 months of approval of the work plan, and
- Implementation milestones ensuring that owners and operators meeting the new registration criteria are identified within 24 months of the approval date of the work plan, and
- Implementation milestones ensuring that owners and operators meeting the new registration criteria are registered and thereby required to comply with applicable Reliability Standards within 36 months of the approval date of the work plan.

On May 18, 2023, the Commission accepted NERC's Work Plan and directed NERC to provide updates every 90 days detailing progress to date. This document reflects the updated Work Plan.

Section I. Introduction

NERC recognizes that the landscape of the electric power system across North America is experiencing a substantial transformation. Conventional generation fueled in large part by coal, nuclear, and, in recent years, natural gas turbines are being rapidly replaced by decentralized generation consisting of IBRs. These energy resources are primarily battery energy storage systems (BESS), solar photovoltaic (i.e., solar PV), and wind that are installed on the BPS and distribution systems. As stated in NERC's recent document Inverter-Based Resource Strategy Ensuring Reliability of the Bulk Power System with Increased Levels of

[1] The Order states *"This order uses the term IBRs to include all generating facilities that connect to the electric power system using power electronic devices that change direct current (DC) power produced by a resource to alternating current (AC) power compatible with distribution and transmission systems. This order does not address IBRs connected to the distribution system."*

[2] The Bulk Power System (BPS) is defined in the Glossary of Terms Used in NERC Reliability Standards as: (A) facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof); and (B) electric energy from generation facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy. (Note that the terms "Bulk-Power System" or "Bulk Power System" shall have the same meaning.)

[3] *Registration of Inverter-Based Resources,* 181 FERC ¶ 61,124 (2022) [hereinafter *IBR Order*].

BPS-Connected IBRs[4] (IBR strategy), "[t]he rapid interconnection of bulk power system (BPS)-connected inverter-based resources (IBR) is the most significant driver of grid transformation and poses a high risk to BPS reliability."

Evidence examined by NERC and the six Regional Entities (together the ERO Enterprise) over the 2017 – 2021 five-year timeframe reveals that the total capacity supplied by fossil-fired and nuclear resources on the BPS has decreased by 29 GW and the total generation supplied by IBRs has increased by 73 GW. IBRs accounted for over 15% of total resource capacity on the BPS in 2021 but only 84% of these IBRs are registered with NERC. Further, the large majority of the non-registered IBR capacity on the BPS is located at plants 20 MW and greater – approx. 24.3 GW (2021), and this total is expected to continue its rapid increase in the foreseeable future.[5]

As recognized by the IBR Order, this transformation has created a present and ongoing risk to the Reliable Operation of the BES. As a result, the ERO Enterprise plans to develop revisions to its Registration Criteria as reflected in Sections 500, Appendix 5A, and Appendix 5B of the NERC Rules of Procedure (ROP) under the milestones set forth below.

Section II. Proposed Registration Criteria Revisions for BPS Connected Generator Owners and Operators

NERC plans to modify its process to encompass presently unregistered IBRs through changes to its registration program. In particular, NERC proposes to revise its Registry Criteria under the ROP by including two new functions comprised of owners and operators of unregistered IBRs interconnected to the BPS as these resources and their owners/operators have a material aggregate impact on reliability of the BES according to the thresholds reflected in the proposed Registry Criteria. Proposed revisions to the Registry Criteria would be developed through the process applicable under the ROP, NERC Bylaws, and applicable Commission regulation.

The draft proposal would include revisions to Appendices 2, 5A, and 5B of the ROP to incorporate the new GO-IBR and GOP-IBR functions and was posted on September 13, 2023 on NERC's ROP webpage as discussed in the transmittal filing associated with this updated Work Plan.[6] Supporting materials were also posted on the NERC Registration webpage.[7]

Registering GO-IBR and GOP-IBR entities will lead to application of results-based Reliability Standards to address issues such as facility interconnection, data sharing, modeling, ride-through, and performance. As elaborated in the IBR Order, "Unregistered IBRs often have small individual generation capacities, are connected to the Bulk-Power System at less than 100 kV transmission or sub-transmission voltages, and do not meet one of the inclusions in the BES definition."[8] As the Commission concludes, "events and disturbances have shown that IBRs, regardless of size and transmission or sub-transmission voltage, have

[4] Available at: https://www.nerc.com/comm/Documents/NERC_IBR_Strategy.pdf
[5] To help avoid potential confusion, NERC clarifies that in referring to IBRs, this Work Plan does not include distributed energy resources. Rather it only includes IBRs that are interconnected to the BPS. Nonetheless, NERC is reviewing potential impacts associated with DERs on the BPS.
[6] https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx.
[7] https://www.nerc.com/pa/comp/Pages/Registration.aspx
[8] IBR Order, at P 23. *See also, id.*, at P 32-33.

a material impact on Bulk-Power System reliability….until unregistered IBRs are registered, they will not be required to comply with the Reliability Standards."[9]

Please see the accompanying transmittal, prior filings in this proceeding, and the materials posted on the Registration webpage for more details regarding the rationale underlying the present proposal. NERC is also reviewing comments on the ROP posting and anticipates submitting its draft Registry Criteria to the NERC Board of Trustees (Board) in February of 2024. If approved, NERC would then file the proposed Registry Criteria revisions to the Commission.

Section III. Milestones to Implement Work Plan[10]

In addition to the milestones below, the ERO Enterprise will also continue to consider whether revisions to the BES Definition might also support continued reliability of the BPS as the grid transforms. NERC will update the milestones as appropriate in future update filings.

The Commission approved the work plan on May 18, 2023. Within 12 months of this date, NERC will do the following to revise its Registration Program:[11]

TIMEFRAME	ACTIVITIES	STATUS
Month 1 (June 2023)	• ERO Enterprise to complete review and draft proposed revisions of Section 500 and Appendices 5A and 5B of the ROP.	✓ Completed draft ROP revisions ✓ Stakeholder meeting with industry volunteers June 2, 2023.
Month 2 (July 2023)	• ERO Enterprise to coordinate with the Organization Registration and Certification Subcommittee (ORCS) of the Compliance and Certification Committee (CCC) on proposed revisions.[12] • ERO Enterprise to present proposed revisions to the CCC.	✓ Presented proposed revisions to CCC/ORCS July 19, 2023 ✓ Received comments from ORCS on proposed ROP revisions.
Month 3 (August 2023)	• ERO Enterprise to present proposed revisions to other key stakeholder organizations in North America. • NERC to present proposed revisions to the MRC. • NERC to file work plan update with FERC.	✓ Presented proposed revisions to SEIA leadership on August 3, 2023. ✓ File Work Plan Update August 16, 2023. ✓ Present/Discuss ROP revisions at the Board meeting.

[9] IBR Order, at P 30.

[10] Throughout this period and as directed in the IBR Order, once the Commission approves the proposed work plan, NERC would also submit progress updates every 90 days thereafter. Please also refer to NERC's filings in Docket No. RM22-12-000 for more information regarding matters pertaining to IBR affiliated Reliability Standards.

[11] ✓ Indicates the activity status is complete.

[12] The CCC and ORCS work plans for 2023 contemplate providing comments on proposed revisions to the ROP related to IBRs and the Registration Program.

TIMEFRAME	ACTIVITIES	STATUS
Month 4-5 (September – October 2023)	• ERO Enterprise to complete revisions to initial draft ROP proposal to address informal stakeholder feedback. • NERC to post ROP revisions for public comment period on NERC website for 45 days.	✓ NERC completed and posted the proposed ROP revisions for comment on September 13, 2023. ✓ NERC received comments on the posted ROP revisions from September 13 through October 30, 2023.
Month 6 (November 2023)	• NERC to file work plan update with FERC.	✓ Filed Work Plan Update November 14, 2023.
Month 7 (December 2023)	• ERO Enterprise to incorporate any further revisions to the ROP to the extent determined appropriate to address comments. • ERO Enterprise to prepare matrix summarizing proposal, comments, and responses thereto. • ERO Enterprise to present initial consideration of GO-IBR and GOP-IBR applicable Reliability Standards at the Reliability and Security Technical Committee December Meeting.	• In progress • In progress • Scheduled for December 7, 2023.
Month 8-10 (January – March 2024)	• ERO Enterprise to request NERC Board approval of the ROP revisions. • NERC to file the proposed ROP revisions with FERC, subject to Board approval, and ○ Request expedited notice, comment, and review over a 3-month period.	• Board Meeting will be February 15-16, 2023.
Month 11-12 (April – May 2024)	• ERO Enterprise to continue considering GO-IBR and GOP-IBR applicable Reliability Standards including a possible subset list of Standards, as appropriate with stakeholder feedback.[13]	• TBD

[13] This work will coordinate with broader Reliability Standards revisions.

Within 24 months of Commission approval of the work plan NERC will do the following to identify GO-IBR and GOP-IBR candidates for registration that meet the updated Registry Criteria:

TIMEFRAME	ACTIVITIES
Month 12-13	• ERO Enterprise to cross reference Energy Information Administration (EIA) Form 860 Database with the NERC Compliance Registry (NCR) to identify unregistered owners of IBRs as potential GO-IBR and GOP-IBR candidates. • NERC to initiate information technology (IT) updates to extent necessary. • ERO Enterprise to issue requests for information to Reliability Coordinators, Planning Coordinators, Transmission Owners, Transmission Planners, and Distribution Providers regarding GO-IBR and GOP-IBR entities in their footprints. • ERO Enterprise to issue bulletins and other communication materials announcing the GO-IBR and GOP-IBR functions and obligation to register. • NERC to file work plan update with FERC.
Month 13-14	• ERO Enterprise to compare identified unregistered owners of IBRs to the GO-IBR and GOP-IBR Registry Criteria to identify candidates. • ERO Enterprise to develop approach for implementation of GO-IBR and GOP-IBR registration and applicable Reliability Standards, including a possible subset list of Standards, as appropriate. • ERO Enterprise to send communication to GO-IBR candidates for Registration. • ERO Enterprise to issue notice of webinar on Registration for the GO-IBR function.
Month 14-20	• ERO Enterprise to hold workshops across Regional Entities and at NERC regarding GO-IBR and GOP-IBR registration and implementation. • NERC to file work plan update(s) with FERC.
Month 20-22	• ERO Enterprise to examine any updates to EIA Form 860 Database. • NERC to file work plan update with FERC.

TIMEFRAME	ACTIVITIES
Month 23-24	• ERO Enterprise to send communication to any newly identified unregistered GO-IBR and GOP-IBR candidates, as needed. • NERC to continue IT transitions as necessary.

Within 36 months of Commission approval of the work plan, NERC will do the following to register GO-IBR and GOP-IBR candidates:

TIMEFRAME	ACTIVITIES
Month 25-26	• ERO Enterprise to hold training for GO-IBR and GOP-IBR entities on the Centralized Organization Registration ERO System (CORES).[14] • ERO Enterprise to provide ERO Enterprise 101 Informational Package, ERO Enterprise Entity Onboarding Checklist, and guidance.[15] • NERC to file work plan update with FERC.
Month 26-27	• NERC to complete IT transition for expansion of registration for the GO-IBR and GOP-IBR entities.
Month 27-36	• NERC to file work plan update(s) with FERC. • ERO Enterprise to issue notification letters to new GO-IBR and GOP-IBR entities that will provide notice of registration and responsibility for compliance with applicable NERC Reliability Standards.

[14] The ERO Enterprise anticipates the need to update its IT, external facing communications, and systems to accommodate the registration of GO-IBR entities. This may impact the milestones reported on during 90-day progress reports.

[15] The ERO Enterprise has already been providing such materials to stakeholder groups, and is examining further opportunities for dissemination and update to facilitate a smooth transition if Registry Criteria revisions are approved.

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Attachment 2

Communication Plan

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Communication Plan

Generator Owner – Inverter-Based Resources and Generator Operator – Inverter-Based Resources

November 14, 2023

Communication Goals

NERC plans the following overarching communication strategies to begin identifying and informing Generator Owner (GO) Inverter-Based Resources (IBR) and Generator Operator (GOP) – IBR candidates of the proposed GO-IBR and GOP-IBR functional registrations. This proposed communication plan includes activities during the three phases of activity outlined in the Work Plan filed with the Commission in Docket No. RD22-4-000.

The communication plan would help ensure that all stakeholders (including non-registered entities) become informed and engaged with the ERO Enterprise. The following table outlines the overarching communication activities to support the GO-IBR and GOP-IBR registration work plan.

TIMEFRAME	ACTIVITIES
Month 1-6	• Communicated to industry stakeholder groups* based on approved work plan activities that support the overall effort. • Sought feedback from generation industry. • Sought feedback from IBR industry associations. • Hosted informational webinar(s) regarding the work plan to make revisions the NERC ROP, including an overview of the ERO organization, Reliability Standards, and current activities. • Hosted informational webinar(s) regarding proposed ROP revisions to generation industry and trade associations.
Month 6-12	• Hosted informational session(s) on proposed ROP revisions. • Began outreach to identify candidates through various channels (e.g., EIA 860 information, NERC functional entities, and industry stakeholders). • Began engaging identified candidates for introduction to NERC and ERO Enterprise. • Begin discussing initial triage of potential applicable Reliability Standards for GO-IBR and GOP-IBR entities.
Month 12-14	• Issue requests for information to Reliability Coordinators, Planning Coordinators, Transmission Owners, Transmission Planners, and Distribution Providers regarding GO-IBR and GOP-IBR entities in their footprints. • Issue bulletins and other communication materials announcing the GO-IBR and GOP-IBR functions and obligation to register, including the list of

TIMEFRAME	ACTIVITIES
	applicable Reliability Standards, or a subset list, as appropriate. This list may be revised as Reliability Standards are further modified in accordance with the Standards Process Manual.
Month 14-24	• Hold workshops across Regional Entities and at NERC regarding GO-IBR and GOP-IBR registration and implementation. • Share ERO Enterprise 101 Informational Package,[1] ERO Enterprise Entity Onboarding Checklist, and onboarding guidance with newly identified GO-IBR and GOP-IBR candidates.[2] • Send communication(s) to GO-IBR and GOP-IBR candidates, as needed.
Months 24-36	• Issue notification letters to new GO-IBR and GOP-IBR entities that will provide notice of registration and responsibility for compliance with applicable NERC Reliability Standards.

***Stakeholders**

The following is an example list of the stakeholders that the ERO Enterprise may communicate with during the various activities associated with the work plan.

- American Clean Power Association (APC)
  - American Wind Energy Association (AWEA) (2020)
  - US Energy Storage Association (ESA) (2022)
- American Public Power Association (APPA)
- American Wind Energy Association (AWEA)
- Canada Energy Regulator (CER)
- Canadian Association of Utility Commissioners (CAMPUT)
- Electricity Canada (EC)
- Electric Producers (EPSA)
- Edison Electric Institute (EEI)
- Electric Power Supply Association (EPSA)
- Energy Systems Integration Group (ESIG)
- National Association of Regulatory Utility Commissioners (NARUC)
- National Rural Electrification Cooperative Association (NRECA)
- North American Generator Forum (NAGF)
- North American Transmission Forum (NATF)
- Regional Transmission Organizations (RTO) & Independent System Operators (ISO)
- Solar Energy Industries Association (SEIA)
- Transmission Access Policy Study Group (TAPS)
- Western Interconnection Compliance Forum (WICF)

[1] ERO Enterprise Informational Package | New Registered Entities: 101, April 7, 2023

[2] Initial information has already been shared, and NERC is continuing to seek opportunities to further disseminate materials and update the materials to support the transition as any revisions to Registry Criteria are implemented.