

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**North American Electric Reliability
Corporation**

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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 (“FERC” or “the 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 (referred to hereafter as “Category 2 GO/GOP”).³ As directed in the Order and prior IBR Order,⁴ NERC hereby submits its quarterly Work Plan progress update on activities executed by NERC and the Regional Entities,⁵ collectively the Electric Reliability Organization (“ERO”) Enterprise. The activities described below and in Attachment 1 to the instant filing demonstrate the ERO Enterprise’s progress toward its Work Plan milestones.

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 development of the Work Plan).

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

³ On June 26, 2024, the Commission approved Registry Criteria in the NERC Rules of Procedure addressing Category 2 Generator Owners and Generator Operators (“GOs/GOPs”). See *Order Approving Revisions to N. Am. Elec. Reliability Corp. Rules of Proc. and Requiring Compliance Filing*, 187 FERC ¶ 61,196 (2024).

⁴ *IBR Order* at PP 21 and 35; *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”).

I. ERO ENTERPRISE IDENTIFICATION OF REGISTRATION CANDIDATES

Since the last Work Plan progress update filing, the ERO Enterprise completed Phase 2 of the Work Plan’s Milestones on May 15, 2025 to meet the FERC directive to identify Category 2 GO/GOP candidates for registration. Attachment 1 to the instant filing provides detail on how the ERO Enterprise completed its work within 24 months of FERC approval of the Work Plan.

Accordingly, the ERO Enterprise identified the following number of IBRs and megavolt-amperes (“MVA”) within each Regional Entity footprint that are, or plan to be, interconnected as of May 15, 2026:⁶

Regional Entity	Number of IBRs	MVA
MRO	110	4454
NPCC	50	1752
ReliabilityFirst	73	3572
SERC	171	9881
Texas RE	34	1792
WECC	282	10725
TOTAL	720	32176

In addition to identification of registration candidates, the ERO Enterprise conducted outreach by hosting a webinar on July 14, 2025 regarding the registration process for Category 2 GO/GOP candidates. As part of this webinar, the ERO Enterprise provided details on the Centralized Organization Registration ERO System, known as CORES, which is the technology involved in managing registration.

⁶ As noted in the last update filing on May 6, 2025, these numbers are subject to change due to some of the following reasons: (1) facilities have been cancelled or have had their expected commercial operations date delayed past May 15, 2026; (2) facilities were Type 1 or Type 2 wind turbines that do not qualify as Category 2 resources; (3) facilities were determined to be Category 1 resources and the affected Regional Entities will register those facilities as such; or (4) facilities were inaccurately reported and should be removed from the list.

II. NEXT STEPS AND CONTINUED OUTREACH

In the upcoming months, the ERO Enterprise will implement Phase 3 of the Work Plan Milestones by registering candidates that own and operate the IBRs and meet the Category 2 GO/GOP registry criteria, with the registration effective on May 15, 2026.⁷ Over the next three Work Plan progress update filings with FERC, NERC will report on the percentage of Category 2 GO/GOP registrations completed within each Regional Entity footprint.

As noted in previous Work Plan filing updates, NERC and the Regional Entities have developed a comprehensive communications plan to coordinate messaging to stakeholders regarding the Work Plan. To aid that effort, NERC has posted a quick reference guide, which includes key activities, IBR Registration milestones, and links to various resources and projects regarding Reliability Standard revisions related to IBRs. To that end, NERC continues to update its publicly posted reference guide on the IBR Registration Initiative and provide links to various materials for candidates for registration, including the IBR webinar series and frequently asked questions, as well as the NERC Registration and NERC Standards pages.⁸ NERC anticipates that this communications plan will aid new entrants with integrating into ERO Enterprise activities under section 215 of the Federal Power Act⁹ and assist existing registered entities in understanding next steps.

⁷ This timeline meets the FERC directive to register candidates within 36 months of FERC approval of the Work Plan.

⁸ NERC, Quick Reference Guide: IBR Registration Initiative (July 2025), available at https://www.nerc.com/pa/Documents/IBR%20Registration%20Initiative_Quick%20Reference%20Guide.pdf.

⁹ 16 U.S.C. 824o.

III. CONCLUSION

The ERO Enterprise looks forward to continuing to work with industry stakeholders and the Commission to: (i) implement the Commission-approved Registry Criteria that address owners and operators of IBRs that are not currently required to register, and (ii) integrate new registrants that meet the revised Registry Criteria into relevant ERO Enterprise efforts. For the reasons set forth above, NERC respectfully requests that the Commission accept this Work Plan update.

Respectfully submitted,

/s/ Marisa Hecht

Senior Counsel

North American Electric Reliability
Corporation

1401 H Street NW, Suite 410

Washington, D.C. 20005

(202) 400-3000

marisa.hecht@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

Date: August 4, 2025

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 the above-referenced proceeding.

Dated at Washington, D.C. this 4th day of August 2025.

/s/ Marisa Hecht

Marisa Hecht
*Counsel for North American
Electric Reliability Corporation*

Registration of Inverter Based Resources – Docket No. RD22-4-001

NERC Work Plan Progress Update

August 4, 2025

On November 17, 2022, in order to respond to concerns regarding the reliability impacts from inverter-based resources (“IBRs”)¹ on the Bulk Power System² (“BPS”), the Federal Energy Regulatory Commission (“FERC” or the “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;
- 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. Consistent with that directive, this Work Plan update provides progress on the activities identified in NERC’s Work Plan. Specifically, NERC and the Regional Entities have advanced efforts to identify unregistered IBRs since the Commission approved the ROP revisions in June 2024. As the Commission has now approved the ROP revisions, this work plan update removes certain background information on the ROP revisions included in prior updates and focuses on the status of the milestones identified in NERC’s Work Plan.

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*].

Milestones to Implement Work Plan⁴

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:⁵

TIMEFRAME	ACTIVITIES	STATUS
Month 1 (June 2023)	<ul style="list-style-type: none">• ERO Enterprise to complete review and draft proposed revisions of Section 500 and Appendices 5A and 5B of the ROP.	<ul style="list-style-type: none">✓ Completed draft ROP revisions.✓ Stakeholder meeting with industry volunteers June 2, 2023.
Month 2 (July 2023)	<ul style="list-style-type: none">• ERO Enterprise to coordinate with the Organization Registration and Certification Subcommittee (ORCS) of the Compliance and Certification Committee (CCC) on proposed revisions.⁶• ERO Enterprise to present proposed revisions to the CCC.	<ul style="list-style-type: none">✓ Presented proposed revisions to CCC/ORCS July 19, 2023.✓ Received comments from ORCS on proposed ROP revisions.
Month 3 (August 2023)	<ul style="list-style-type: none">• 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.	<ul style="list-style-type: none">✓ 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.
Month 4-5 (September – October 2023)	<ul style="list-style-type: none">• 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.	<ul style="list-style-type: none">✓ 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.

⁴ Please also refer to NERC's filings in Docket No. RM22-12-000 for more information regarding matters pertaining to IBR affiliated Reliability Standards.

⁵ ✓ Indicates the activity status is complete.

⁶ 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 6 (November 2023)	<ul style="list-style-type: none"> • NERC to file work plan update with FERC. 	<ul style="list-style-type: none"> ✓ Filed Work Plan Update November 14, 2023.
Month 7 (December 2023)	<ul style="list-style-type: none"> • 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 applicable Reliability Standards at the Reliability and Security Technical Committee December Meeting. 	<ul style="list-style-type: none"> ✓ Posted final draft January 22, 2024. ✓ Posted matrix summarizing proposal, comments, and responses thereto January 22, 2024. ✓ Presented December 7, 2023.
Month 8-10 (January – March 2024)	<ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> ○ Request expedited notice, comment, and review over a 3-month period. • NERC to file work plan update with FERC. 	<ul style="list-style-type: none"> ✓ Discussed at Board meeting February 15-16, 2024. ✓ NERC Board approved proposed ROP revisions February 22, 2024. NERC filed proposed Registry Criteria ROP revisions with FERC March 19, 2024. ✓ Filed Work Plan Update February 12, 2024.
Month 11-12 (April – May 2024)	<ul style="list-style-type: none"> • ERO Enterprise to continue considering applicable Reliability Standards including a possible subset list of Standards, as appropriate with stakeholder feedback.⁷ 	<ul style="list-style-type: none"> ✓ The ERO Enterprise has standards development projects underway addressing applicable Reliability Standards.

⁷ 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 candidates for registration that meet the updated Registry Criteria:

TIMEFRAME	ACTIVITIES	STATUS
Month 12-13 (May – June 2024)	<ul style="list-style-type: none"> • 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 candidates under revised Registry Criteria. • 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 potential Category 2 GOs/GOPs in their footprints. • ERO Enterprise to issue bulletins and other communication materials to support registration. • NERC to file work plan update with FERC. 	<ul style="list-style-type: none"> ✓ The ERO Enterprise examined updates to EIA Form 860 Database. ✓ The ERO Enterprise has initiated the update to CORES for the new Category 2 GOs and GOPs. ✓ On July 8, 2024, the ERO Enterprise issued a request for information to BAs and TOs. Responses were due by September 20, 2024. ✓ Posted a quick reference guide on the IBR Registration Initiative that includes quarterly updates on activities associated with the IBR Registration Initiative.⁸ ✓ Filed Work Plan Update May 10, 2024.
Month 13-14 (June – July 2024)	<ul style="list-style-type: none"> • ERO Enterprise to compare identified unregistered owners and operators of IBRs to the revised Registry Criteria to identify candidates. • ERO Enterprise to develop an approach for implementation of revised Registry Criteria and applicable Reliability Standards, 	<ul style="list-style-type: none"> ✓ The ERO Enterprise is in the process of validating the information received from the responses to the July 8, 2024 request for information. ✓ NERC Registration, Standards, and Compliance staff have been coordinating on

⁸ The quick reference guide, updated quarterly, is available on NERC's website at https://www.nerc.com/pa/Documents/IBR_Quick%20Reference%20Guide.pdf.

TIMEFRAME	ACTIVITIES	STATUS
	including a possible subset list of Standards, as appropriate.	standards that will be applicable to Category 2 GO/GOPs.
Month 14-20 (July 2024 – January 2025)	<ul style="list-style-type: none"> • ERO Enterprise to hold workshops across Regional Entities and at NERC regarding registration and implementation. • NERC to file work plan update(s) with FERC. • ERO Enterprise to issue notice of webinar on Registration. • ERO Enterprise to send communication to candidates for Registration. 	<ul style="list-style-type: none"> ✓ Regional Entity workshops have included IBR registration as a topic. ✓ Filed Work Plan Update August 9, 2024 and November 7, 2024. ✓ On October 14, 2024, the ERO Enterprise issued a notice that it would host a webinar on the IBR Registration Initiative on November 13, 2024. The ERO Enterprise conducted the webinar on November 13, 2024. ✓ The ERO Enterprise initiated communications with newly identified entities that may be candidates for registration as Category 2 GO/GOPs.
Month 20-22 (January – March 2025)	<ul style="list-style-type: none"> • ERO Enterprise to examine any updates to EIA Form 860 Database. • NERC to file work plan update with FERC. • ERO Enterprise to hold outreach events. 	<ul style="list-style-type: none"> ✓ Filed Work Plan Update February 5, 2025. ✓ On January 31, 2025, the ERO Enterprise posted the ERO Enterprise CMEP Practice Guide: Application of the Registration Criteria for Category 2 Generator Owner and Generator Operator Inverter-Based Resources. ✓ On March 3, 2025, the ERO Enterprise held an informational webinar to address the CMEP Practice Guide and

TIMEFRAME	ACTIVITIES	STATUS
		answer questions from stakeholders.
Month 23-24 (April – May 2025)	<ul style="list-style-type: none"> • ERO Enterprise to send communication to any newly identified candidates for registration, as needed. • NERC to continue IT transitions as necessary. 	<ul style="list-style-type: none"> ✓ ERO Enterprise initiated communications with identified entities to conduct registration assessments, as necessary. ✓ NERC continued to work on CORES functionality to register Category 2 GOs/GOPs and is on schedule for production.

Within 36 months of Commission approval of the work plan, NERC will do the following to register new candidates:

TIMEFRAME	ACTIVITIES	STATUS
Month 25-26 (June – July 2025)	<ul style="list-style-type: none"> • ERO Enterprise to hold training for newly registering entities on the Centralized Organization Registration ERO System (CORES).⁹ • ERO Enterprise to provide ERO Enterprise 101 Informational Package, ERO Enterprise Entity Onboarding Checklist, and guidance.¹⁰ • NERC to file work plan update with FERC. 	<ul style="list-style-type: none"> ✓ ERO Enterprise hosted a webinar on July 14, 2025 regarding the registration process and CORES for Category 2 GOs/GOPs. • In progress. ✓ NERC filed a progress update on August 4, 2025.
Month 26-27 (July – August 2025)	<ul style="list-style-type: none"> • NERC to complete IT transition for expansion of registration for new entities. 	<ul style="list-style-type: none"> ✓ NERC completed testing on CORES functionality, and it is in production.
Month 27-36 (August 2025 – May 2026)	<ul style="list-style-type: none"> • NERC to file work plan update(s) with FERC. 	<ul style="list-style-type: none"> • In progress until May 15, 2026. NERC filed a progress update on August 4, 2025.

⁹ The ERO Enterprise anticipates the need to update its IT, external facing communications, and systems to accommodate the registration of the new entities. This may impact the milestones reported on during 90-day progress reports.

¹⁰ 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 now that Registry Criteria revisions are approved.

TIMEFRAME	ACTIVITIES	STATUS
	<ul style="list-style-type: none"> ERO Enterprise to issue notification letters to newly registered entities that will provide notice of registration and responsibility for compliance with applicable NERC Reliability Standards. 	<ul style="list-style-type: none"> In progress.