

Implementation Plan

Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)

Proposed Modified Definitions in the NERC Glossary of Terms

This section includes modified definitions for inclusion in the *Glossary of Terms used in NERC Reliability Standards* (“Glossary”), as well as current NERC Glossary terms proposed for retirement.

Proposed Modified Definition(s):

- Generator Owner (GO)
- Generator Operator (GOP)

Background

Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) was initiated in June 2024 and concerns the reliability impacts of Inverter-Based Resources (IBRs) on the Bulk-Power System (BPS) that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in Docket No. RD22-4-000, in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See Registration of IBRs, 181 FERC ¶ 61,124 (2022).

FERC approved changes to the NERC Rules of Procedure (ROP) registry criteria to include certain non-BES IBRs in the Generator Owner (GO) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to align with the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impact on the BPS. See Order Approving Revisions to NERC ROP and Requiring Compliance Filing, 187 FERC ¶ 61,196 (2024).

General Considerations

The Project 2024-01 Drafting Team (DT) has proposed modification to the definitions of “Generator Owner” and “Generator Operator” as defined in the NERC Glossary to ensure the inclusion of Category 2 criteria as referenced in the NERC ROP, which includes some IBRs connected to the BPS that do not meet the current definition of BES.

Effective Date for the Modified Definitions for NERC Glossary of Terms

Where approval by an applicable governmental authority is required, the modified definitions shall become effective on the first day of the first calendar quarter after the effective date of the

applicable governmental authority's order approving the definitions, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the modified definitions shall become effective on the first day of the first calendar quarter after the date the definitions are adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Compliance Dates for the Listed Standards

Eight (8) Reliability Standards have been identified through a NERC staff analysis¹ as applicable and enforceable to generation assets that meet the Category 2 criteria without any revisions to those Reliability Standards or requirements.

For those generation assets that meet the Category 2 criteria in the modified definitions, GOs and GOPs shall comply with the below-listed Reliability Standards on May 15, 2026, or as otherwise provided for by the applicable governmental authorities in that jurisdiction.

These standards are as follows:

- BAL-001-TRE-2
- IRO-010-5
- MOD-032-1
- PRC-012-2
- PRC-017-1
- TOP-003-6.1
- VAR-001-5
- VAR-002-4.1

Reliability Standards that specify they are applicable only to BES Facilities will not be enforceable on Category 2 facilities unless there is a specific Reliability Standards project that revises them to include Category 2 facilities.

For requirements in the Reliability Standards that require an action be taken in response to an action or request by another functional entity (e.g., responding to data specifications or following voltage schedules), any GO or GOP with one or more facilities that meet the Category 2 criteria, shall be required to comply only after the action or request is made. This only applies to GO or GOP Category 2 facilities.

¹ [NERC GO-GOP Analysis Summary.docx](#)

Currently approved Reliability Standards PRC-028-1, PRC-030-1, and recently filed NERC Reliability Standard PRC-029-1 is drafted such that, if approved, will be enforceable for Category 2 GOs and GOPs based on the Implementation Plans for those Reliability Standards.

All other Reliability Standards using GO and GOP may become applicable and enforceable to generation assets that meet the Category 2 criteria upon their revision² and in accordance with their respective revised Reliability Standard language and Implementation Plans.

Definitions Proposed for Retirement

The definitions proposed for retirement shall be retired immediately prior to the effective date of the modified GO and GOP definitions in the particular jurisdiction in which these modified definitions become effective.

² [NERC ROP Appendix 3A](#)