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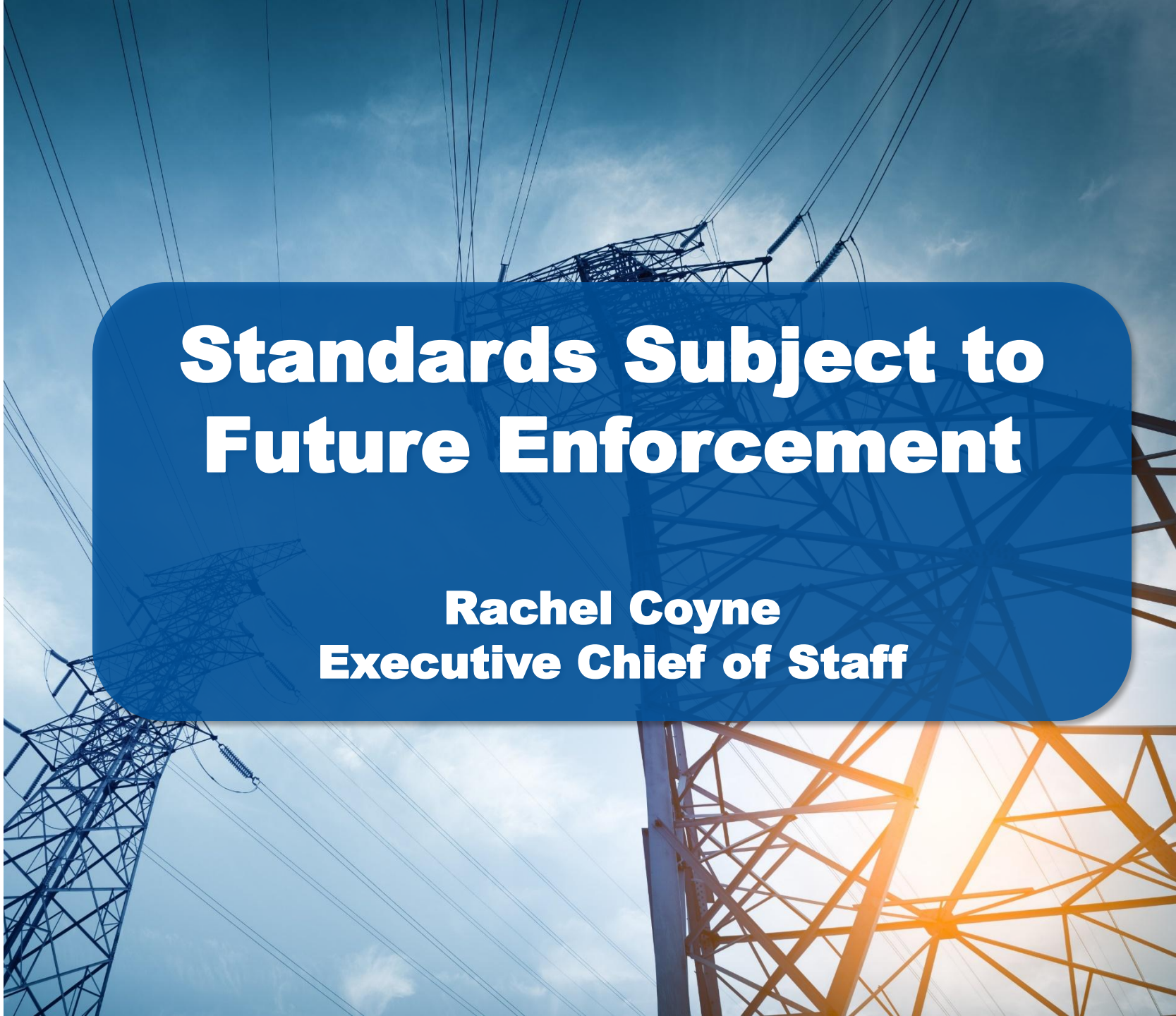

Standards Subject to Future Enforcement

Rachel Coyne
Executive Chief of Staff

Currently Posted Projects

Project	Action	End Date
2022-05 Modifications to CIP-008 Reporting Threshold | CIP-003-12, CIP-008-8	Comment Period	10/24/2025
2017-01 Modifications to BAL-003 Phase II	Informal Survey	10/29/2025
2022-04 EMT Modeling | FAC-002-5	Initial Ballot and Comment Period	11/21/2025

Recently Posted

Project	Action	End Date
2021-01 System Model Validation with IBRs (MOD-033-3)	Additional Ballot and Comment Period	9/10/2025
2022-02 Uniform Modeling Framework for IBRs (MOD-032-2, IRO-010-6, TOP-003-8)	Additional Ballot and Comment Period	9/10/2025
2020-06 Verifications of Models and Data for Generators (MOD-026-2)	Additional Ballot and Comment Period	9/10/2025
2025-03 Order No. 901 Operational Studies	SAR Comment Period	10/1/2025
2025-04 Order No. 901 Planning Studies	SAR Comment Period	10/1/2025

Recently Effective Standards

Standard/Requirement	Enforcement Date
TOP-002-5	10/1/2025
EOP-012-3	10/1/2025

Standards Upcoming Enforcement/Effective Dates

Standard/Requirement	Enforcement Date
PRC-012-2 R4 (Initial Performance)	1/1/2026

Standards Upcoming Enforcement/Effective Dates

Standard/Requirement	Enforcement Date
CIP-003-9	4/1/2026
TPL-008-1	4/1/2026

Standards Upcoming Enforcement/Effective Dates

Standard/Requirement	Enforcement Date
CIP-012-2	7/1/2026

Standards Upcoming Enforcement/Effective Dates

Standard/Requirement	Enforcement Date
TOP-003-7	10/1/2026
PRC-024-4	10/1/2026
PRC-029-1	10/1/2026
PRC-030-1	10/1/2026

Standards Upcoming Enforcement/Effective Dates

Standard/Requirement	Enforcement Date
PRC-012-2 R8 (Initial Performance)	1/1/2027

Standards Upcoming Enforcement/Effective Dates

Standard/Requirement	Enforcement Date
BAL-007-1	4/1/2027

Standards Upcoming Enforcement/Effective Dates

Standard/Requirement	Enforcement Date
CIP-015-1	10/1/2028

EOP-011-4 Implementation Dates

Effective Date:	1st day of first calendar quarter 6 months following regulatory approval		10/1/2024	
Requirement		**Implementation Plan**	**Compliance Date**	**Notes**
Part 1.2.5	Compliant by	30 months after the Effective Date	10/1/2024	Manual load shed - 10/1/2024 effective date UVLS and UFLS - 4/1/2027 effective date
Part 1.2.5.1	Compliant by	Effective Date	10/1/2024	
Part 1.2.5.2	Compliant by	Effective Date	10/1/2024	Manual load shed - 10/1/2024 effective date UVLS and UFLS - 4/1/2027 effective date
Part 1.2.5.3	Compliant by	Effective Date	10/1/2024	
Part 1.2.5.4	Compliant by	Effective Date	10/1/2024	
Part 1.2.5.5	Compliant by	30 months after the Effective Date	4/1/2027	
Part 2.2.8	Compliant by	30 months after the Effective Date	4/1/2027	
Part 2.2.9	Compliant by	30 months after the Effective Date	10/1/2024	Manual load shed - 10/1/2024 effective date UVLS and UFLS - 4/1/2027 effective date
R8	Compliant by	30 months after the Effective Date	4/1/2027	

EOP-012-3 Implementation Plan

Effective Date of EOP-012-3	October 1, 2025 per FERC Order	10/1/2025
Requirement	**Implementation Plan**	**Compliance Date**
R1	Effective date of EOP-012-2 in accordance with that implementation plan	10/1/2029
R2	For generating units for which the GO first contractually committed2 to design criteria relevant to this Requirement before June 29, 2023, and which enter commercial operation between October 1, 2027 and March 31, 2028, the GO shall comply with Requirement R2 relating to implementing required capability by no later than April 1, 2028	4/1/2028
R2	If declaring a Generator Cold Weather Constraint	timeline in R8
R3	Entities beginning commercial operation after the effective date of EOP-012-3 shall become compliant with Requirement R3 no later than the commercial operations date for the applicable unit.	
R8	Entities shall review all Generator Cold Weather Constraints previously declared under Reliability Standard EOP-012-2 for compliance with Reliability Standard EOP-012-3 Attachment 1 by the effective date. Each entity shall submit any previously declared Generator Cold Weather Constraints to the Compliance Enforcement Authority (CEA) no later than 45 days following the effective date of Reliability Standard EOP-012-3. Newly declared Generator Cold Weather Constraints shall be submitted in accordance with the timelines specified in Requirement R8.	
R9	36 calendar months following validation by the CEA	

PRC-005-6 Implementation Dates

- Implementation Plan
- Implementation Plan – Calendar View
- Implementation Plan – Requirements View

PRC-012-2 Initial Performance Dates

Effective Date	First day of first calendar quarter 36 months after effective date of the Order	1/1/2021
Requirement No.	**Initial Performance verbiage in IP**	**Initial Performance by**
R1	N/A	N/A
R2	N/A	N/A
R3	N/A	N/A
R4	For existing RAS, initial performance must be completing within 5 full calendar years after the effective date of PRC-012-2. For new or functionally modified RAS, initial performance must be completed within 5 full calendar years after the date the RAS is approved by the RC under Requirement R3	1/1/2026 date RC approves RAS
R5	N/A	N/A
R6	N/A	N/A
R7	N/A	N/A
R8	For each RAS not designated as limited impact, initial performance of obligations under Requirement R8 must be completed at least once within six (6) full calendar years after the effective date for PRC-012-2, as described above. For each RAS designated as limited impact, initial performance of obligations under Requirement R8 must be completed at least once within twelve (12) full calendar years after the effective date for PRC-012-2, as described above.	1/1/2027
R9	For each Reliability Coordinator that does not have a RAS database, the initial obligation under Requirement R9 is to establish a database by the effective date of PRC-012-2. Each Reliability Coordinator will perform the obligation of Requirement R9 within twelve full calendar months after the effective date of PRC-012-2, as described above.	1/1/2022

PRC-025-2 Phased-In Dates

Effective Date: 7/1/2018

Load-Responsive protective relays subject to the standard			
Requirement	Applicability	Implementation Date	Date
R1	Each GO, TO, and DP shall apply settings that are in accordance with PRC-025-2 Attachment 1: Relay Settings, on each load-responsive protective relay while maintaining reliable protection	Where determined by the GO, TO, or DP that replacement or removal is not necessary, the later of 10/1/19 or 12 months after effective date except as noted in Attachment 1 Table 1	10/1/2019 or Table 1 dates
		Where determined by the GO, TO, or DP that replacement or removal is necessary, the later of 10/1/19 or 36 months after effective date except as noted in Attachment 1 Table 1	7/1/21 or Table 1 dates

PRC-025-2 Phased-in Implementation of specific Table 1 Relay Loadability Evaluation Criteria Options

Option	Application and Relay Type	Implementation Date	Date
Option 5b	Asynchronous generating unit(s) (including inverter-based installations), including Elements utilized in the aggregation of dispersed power producing resources applying any phase of overcurrent relay (e.g. 51, or 51V-R - voltage-restrained)	Where determined by the GO, TO, or DP that replacement or removal is not necessary, 24 months after effective date	7/1/2020
		Where determined by the GO, TO, or DP that replacement or removal is necessary, 48months after effective date	7/1/2022
Options 2a, 2b, and 2c (50 element only)	Synchronous generating unit(s), including Elements utilized in the aggregation of dispersed power producing resources applying, specifically the phase of overcurrent relay 50 element.	Where determined by the GO, TO, or DP that replacement or removal is not necessary, 60 months after effective date	7/1/2023
		Where determined by the GO, TO, or DP that replacement or removal is necessary, 84 months after effective date	7/1/2025
Options 5a and 5b (50 element only)	Asynchronous generating unit(s) (including inverter-based installations), including Elements utilized in the aggregation of dispersed power producing resources applying specifically the phase overcurrent relay 50 element.	Where determined by the GO, TO, or DP that replacement or removal is not necessary, 60 months after effective date	7/1/2023
		Where determined by the GO, TO, or DP that replacement or removal is necessary, 84 months after effective date	7/1/2025

PRC-025-2 Phased-in Implementation of specific Table 1 Relay Loadability Evaluation Criteria Options

Options 8a , 8b, and 8c (50 element only)	Generator step-up transformer(s) connected to synchronous generators applying, specifically the phase overcurrent relay 50 element installed on generatorside of the GSU transformer	Where determined by the GO, TO, or DP that replacement or removal is not necessary, 60 months after effective date	7/1/2023
		Where determined by the GO, TO, or DP that replacement or removal is necessary, 84 months after effective date	7/1/2025
Option 11	Generator step-up transformer(s) connected to asynchronous generators only (including inverter-based installations) applying, specifically the phase overcurrent 50 element - installed on generator-side of the GSU transformer	Where determined by the GO, TO, or DP that replacement or removal is not necessary, 60 months after effective date	7/1/2023
		Where determined by the GO, TO, or DP that replacement or removal is necessary, 84 months after effective date	7/1/2025
Options 13a and 13b (50 element only)	Unit auxiliary transformer(s) (UAT) applying, specifically the phase overcurrent 50 element applied at the high-side terminals of the UAT, for which operation of the relay will cause the associated generator to trip	Where determined by the GO, TO, or DP that replacement or removal is not necessary, 60 months after effective date	7/1/2023
		Where determined by the GO, TO, or DP that replacement or removal is necessary, 84 months after effective date	7/1/2025

PRC-025-2 Phased-in Implementation of specific Table 1 Relay Loadability Evaluation Criteria Options

Option 14b	Relays installed on the high-side of the GSU transformer, including relays installed on the remote end of line, for Elements that connect the GSU transformer(s) to the Transmission system that are used exclusively to export energy directly from a BES generating unit or generating plant (except that Elements may also supply generating plant loads) – connected to synchronous generators applying a phase distance relay (e.g., 21) – directional toward the Transmission system	Where determined by the GO, TO, or DP that replacement or removal is not necessary, 24 months after effective date	7/1/2020
		Where determined by the GO, TO, or DP that replacement or removal is necessary, 48 months after effective date	7/1/2022
Option 15b	Relays installed on the high-side of the GSU transformer, including relays installed at the remote end of the line, for Elements that connect the GSU transformer(s) to the Transmission system that are used exclusively to export energy directly from a BES generating unit or generating plant (except that Elements may also supply generating plant loads) – connected to synchronous generators applying a phase instantaneous overcurrent supervisory element (e.g., 50) – associated with current-based, communication-assisted schemes where the scheme is capable of tripping for loss of communications and/or phase time overcurrent relay (e.g., 51)	Where determined by the GO, TO, or DP that replacement or removal is not necessary, 24 months after effective date	7/1/2020
		Where determined by the GO, TO, or DP that replacement or removal is necessary, 48 months after effective date	7/1/2022

PRC-025-2 Phased-in Implementation of specific Table 1 Relay Loadability Evaluation Criteria Options

Option 16b	Relays installed on the high-side of the GSU transformer, including relays installed at the remote end of the line, for Elements that connect the GSU transformer(s) to the Transmission system that are used exclusively to export energy directly from a BES generating unit or generating plant (except that Elements may also supply generating plant load.) – connected to synchronous generators applying Phase directional instantaneous overcurrent supervisory element (e.g., 67) – associated with current-based, communication assisted schemes where the scheme is capable of tripping for loss of communications directional toward the Transmission system and/or phase directional time overcurrent relay (e.g., 67) – directional toward the Transmission system	Where determined by the GO, TO, or DP that replacement or removal is not necessary, 24 months after effective date	7/1/2020
		Where determined by the GO, TO, or DP that replacement or removal is necessary, 48 months after effective date	7/1/2022

PRC-025-2

For load-responsive protective relays which become applicable to the standard.			
Requirement	Applicability	Implementation Dates	Date
R1	Each Generator Owner, To, and DP shall apply settings that are in accordance with PRC-025-2 - Attachment 1: Relay Settings, on each load responsive protective relay while maintaining reliable fault protection.	Where determined by the GO, TO, or DP that replacement or removal is not necessary, the first day 60 months beyond the date of the load-responsive protective relays become applicable to the standard	7/1/2023
		Where determined by the GO, TO, or DP that replacement or removal is necessary, the first day 84 months beyond the date of the load-responsive protective relays become applicable to the standard	7/1/2025

PRC-028-1

Effective Date	first day of the first calendar quarter after the effective date of the Applicable Governmental Authority's order approving the standard	4/1/2025
Requirement No.	IP Verbiage	**Compliance Date - BES IBR - commercial operation on or before effective date**
R1 - R7	50% of BES IBR within 3 calendar years of the effective date	4/1/2028 (or 12/31/2028?)
R1 - R7	100% of BES IBR	1/1/2030
		Compliance Date - BES IBR - commercial operation on or before effective date - One IBR
R1 - R7	within 3 calendar years of effective date	4/1/2028
		Compliance Date - BES IBR - commercial operation after effective date - One IBR
R1 - R7	within 15 calendar months after effective date	7/1/2026
		Compliance Date - BES-IBR
R8	no later than 9 months after effective date	1/1/2026
		Compliance Date - Non-BES IBR - commercial operation on or before May 15, 2026
R1 - R7	100% of non-BES IBR	1/1/2030
		Compliance Date - Non-BES IBR - commercial operation after May 15, 2026
R1 - R7	within 15 calendar months after effective date or commercial operation, whichever is later	within 15 calendar months after effective date or commercial operation, whichever is later
		Compliance Date - non-BES IBR
R8		4/1/2027

PRC-029-1

Effective Date	First day of the first calendar quarter 12 months after the effective date of the Applicable Governmental Authority's order approving the standard	10/1/2026
Requirement No.	**IP Verbiage**	**Compliance Date - Capability-based BES IBR**
All	Shall comply with the portion of Requirements R1, R2, R3 relating to the design by the effective date of the standard	10/1/2026
		Compliance Date - Capability-based applicable non-BES IBRs
	Shall comply with the portion of R1, R2, R3 relating to design later of: (1) January 1, 2027; or (2) the effective date of the standard	1/1/2027
		Compliance Date - Performance-based all applicable IBRS
	Entities shall not be required to comply with the portion of Requirements R1, R2, and R3 relating to the operation of IBRs to meet the requirements until the entity has established the required disturbance monitoring equipment capabilities for those IBRs in accordance with the implementation plan for Reliability Standard PRC-028-1	
		Compliance Date - BES IBRs
R4	effective date of the standard	10/1/2026
		Compliance Date - Non-BES IBRs
R4	later of: (1) January 1, 2027; or (2) the effective date of the standard	1/1/2027

PRC-030-1

Effective Date	Later of 1) the first day of the first calendar quarter that is twelve (12) months after the effective date of the applicable governmental authority's order approving the standard; or 2) the first day of the first calendar quarter that is twelve (12) months after the effective date of the applicable governmental authority's order approving Reliability Standard PRC-029-1	10/1/2026
Requirement No.	**IP Verbiage**	**Compliance Date - BES IBRs**
All	initially comply with all requirements by the effective date of the standard	10/1/2026
		Compliance Date - applicable non-BES IBRs
R1 - R4	later of: (1) January 1, 2027; or (2) the effective date of the standard	1/1/2027

TPL-001-5

Effective Date	First day of first calendar quarter that is 36 months after the effective date of the order	7/1/2023
Requirement No.	**IP Verbiage**	**Effective/Enforcement Date**
R1	First day of first calendar quarter that is 36 months after the effective date of the order	7/1/2023
R2	First day of first calendar quarter that is 36 months after the effective date of the order	7/1/2023
R3	No changes from v4	
R4	First day of first calendar quarter that is 36 months after the effective date of the order	7/1/2023
R5	No changes from v4	
R6	No changes from v4	
R7	No changes from v4	
R8	No changes from v4	
Table 1	First day of first calendar quarter that is 36 months after the effective date of the order	7/1/2023
Table 1 CAPs for category P5 Events	First day of first calendar quarter that is 60 months after the effective date of the order	7/1/2025
Fully Enforceable Date	First day of first calendar quarter that is 108 months after the effective date of the order	7/1/2029

TPL-008-1

Effective Date		first day of first calendar quarter 12 months after the effective date	4/1/2026
Requirement		**Implementation Plan**	**Compliance Date**
R1	Compliant by	upon effective date	4/1/2026
R2	Compliant by	24 months after effective date	4/1/2028
R3	Compliant by	24 months after effective date	4/1/2028
R4	Compliant by	24 months after effective date	4/1/2028
R5	Compliant by	24 months after effective date	4/1/2028
R6	Compliant by	24 months after effective date	4/1/2028
R7	Compliant by	48 months after effective date	4/1/2030
R8	Compliant by	48 months after effective date	4/1/2030
R9	Compliant by	48 months after effective date	4/1/2030
R10	Compliant by	48 months after effective date	4/1/2030
R11	Compliant by	48 months after effective date	4/1/2030

Extreme Temperature Assessment	Initial Performance	No later than 48 months after effective date	4/1/2030
	Subsequent assessments	Bo later than 5 years following the first one	

Recent NERC Filings

On September 23, 2025, NERC submitted its Annual Report on the Find, Fix Track and Report Compliance Exception Programs.

On September 26, 2025, NERC submitted the 2025 Annual Report on Wide-Area Analysis of Technical Feasibility Exceptions in compliance with Paragraphs 220 and 221 of FERC Order No. 706.

On September 29, 2025, NERC submitted its 2025 Frequency Response Annual Analysis Report for the administration and support of Reliability Standard BAL-003-2 - Frequency Response and Frequency Bias Setting.

On October 1, 2025, NERC submitted its Cold Weather Data Collection and Analysis Informational Filing for the 2024-2025 winter season. This filing was directed by FERC in paragraph 95 of the Order Approving Extreme Cold Weather Reliability Standards EOP-011-3 and EOP-012-1 and Directing Modification of Reliability Standard EOP-012-1.

On October 9, 2025, NERC submitted a supplement to its 2026 Business Plan and Budget Filing regarding minor corrections to the NPCC Business Plan and Budget.

Recent FERC Filings

On September 10, 2025, FERC issued an order directing NERC to submit a report in an informational filing on best practices to reduce the risk of wildfire ignition from the Bulk-Power System. The filing is due by May 1, 2026.

On September 18, 2025, FERC issued an order directing NERC to develop Reliability Standards that address the sufficiency of responsible entities' supply chain risk management plans, as well as to develop modifications related to supply chain protections for protected cyber assets. This final rule also terminates a related notice of inquiry. Specifically, FERC directs new or modified reliability standards that address the following:

1. **Establish a maximum timeframe between when a responsible entity performs its initial vendor and equipment risk assessment during the procurement process and when it deploys the equipment. If a responsible entity does not deploy the equipment or software within the specified time limit, the new or modified Reliability Standard should require responsible entities to perform an updated risk assessment prior to deployment. (Paragraph 32)**
2. **Require responsible entities to establish a process to document, track nd respond to all identified supply chain risks (paragraph 53)**
3. **Include PCAs as applicable assets (paragraph 63)**
4. **The new or modified Reliability standards should be done within 18 months of the effective date of the final rule. (Paragraph 69)**

Recent FERC Filings

On September 18, 2025, FERC issued a Notice of Proposed Rulemaking (NOPR) proposing to approve the set of CIP Reliability Standards and definitions filed in July 2024 addressing virtualization. FERC seeks comment on the following:

1. **Regarding the efficacy of the technical feasibility exception program: (1) why is there still a need to maintain an exception process for legacy equipment after 15 years; and (2) specify the administrative burdens associated with the current Technical Feasibility Exception program—have the burdens changed with the maturity of the program?**
2. **Regarding the proposed per system capability language, do NERC or stakeholders anticipate that the proposed CIP changes to accommodate virtualization technology would result in responsible entities seeking new exceptions using the per system capability language (beyond the legacy technical feasibility exceptions)?**
    a. **For new exceptions: (1) how will NERC and/or the Regional Entities monitor system capability exceptions other than through CIP compliance activities (i.e., audits); (2) what parameters or guidance will inform responsible entities on legitimate circumstances to self-implement a system capability exception; (3) what obligations does a responsible entity have to implement alternative mitigation measures in lieu of strict compliance; and (4) how will NERC assure consistency in the review of system capability exceptions across all Regional Entities?**
3. **The commission seeks comment on possible alternative approaches that would streamline the process while also satisfying the need for effective regulatory oversight. For example, FERC would be interested in comments on an approach that would streamline the administrative burden of the current technical feasibility exception process for system capability exceptions while maintaining a requirement to mitigate the noncompliance and reporting of exceptions (and material changes thereto) to the applicable Regional Entity. Comments supporting an alternative approach should include an estimate of the administrative burden, the periodicity for reassessment (if any) and Regional Entity validation (if any), and any other relevant features or details (e.g., reporting requirements to the Commission).**

Recent FERC Filings

On September 18, 2025, FERC issued an order approving Extreme Cold Weather Reliability Standard EOP-012-3 and directing biennial informational filings from NERC on its implementation. FERC directed NERC to submit the following:

1. Anonymized data on the number of submitted Generator Cold Weather Constraint declarations, number of approved declarations, aggregate MVA of approved declarations, and a summary of rational for approved declarations.
2. Narrative analysis on the following:
    a. Whether Reliability Coordinators (RCs), Transmission Operators (TOPs), and Balancing Authorities (BAs) are timely notified of Generator Cold Weather Constraint declarations and corrective action plan extensions
    b. Reliability impacts, if any, of allowing generators 36 months to correct known freeze related issues
    c. Whether Generator Cold Weather Constraint declaration approval process is consistently interpreted and applied by the CEAs in a timely manner, whether the declaration criteria in Attachment 1 is adequately defined and clear, and the reliability impact on the Bulk Power System (BPS) due to declarations from each criterion in Attachment 1 and from approved CAP extensions
3. Filings should start no later than October 2026 and end October 2034.
4. Link to EOP-012-3. Retires EOP-012-2.
5. Link to Implementation Plan
6. Effective: 10/1/2025

Recent FERC Filings

- **On September 18, 2025, FERC issued a Notice of Proposed Rulemaking (NOPR) proposing to approve Reliability Standard CIP-003-11. FERC seeks comment on the continuing evolution of threat of compromise to low impact BES Cyber Systems posed by Volt Typhoon and similar cyberattacks that initially impact low impact BES Cyber Systems and then move laterally and pivot to higher impact BES Cyber Systems to effectuate a broader campaign (Paragraph 18).**

- **On September 24, 2025, FERC issued a letter order accepting NERC's 07/31/2025 compliance filing regarding revisions to the NERC ROP Appendix 4E.**

- **On September 25, 2025, FERC issued Order 913 transferring certain delegation authority regarding ERO filings from the Director of FERC's Office of Energy Market Regulation to the Director of the Office of Electric Reliability.**

- **On September 25, 2025, FERC issued Order No. 909-A, an Order Denying a Request for Clarification submitted by American Clean Power Association and the Solar Energy Industries Association regarding Order No. 909, approving Reliability Standard PRC-029-1 - Frequency and Voltage Ride-Through Requirements for Inverter-Based Resources.**

- **On October 1, 2025, FERC issued a Delegated Letter Order approving revised Generator Owner (GO) and Generator Operator (GOP) definitions used in NERC Reliability Standards.**
  - Effective Date – January 1, 2026

Recent FERC Filings

On October 8, 2025, FERC issued a delegated letter order approving NERC's revisions to the pro forma Regional Delegation Agreement and the revised Regional Delegation Agreements.

Upcoming Texas RE Events

- 10/23/2025 – NSRF Meeting
- 11/5/2025 – Fall Standards, Security, and Reliability Workshop
- 11/13/2025 – Talk with Texas RE: TPL-008
- 11/20/2025 – NSRF Meeting

All Texas RE outreach is posted to the Texas RE calendar on its website.

Resources

- NERC Standards Webpage
  - One-Stop-Shop Spreadsheet
  - Functional Applicability Spreadsheet
  - Balloting and Commenting
- **IBR Initiatives**
  - Quick Reference Guide: IBR Registration Initiative
  - Quick Reference Guide: Inverter-Based Resource Activities
- **Modernization of Standards Processes and Procedures Task Force (MSPP)**
  - NERC Website

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