

Frequently Asked Questions

Inverter-Based Resource (IBR) Registration Initiative | Category 2 Generator Owner (GO) and Generator Operator (GOP) Registration Process

Introduction

The [IBR Registration Initiative](#) addresses some of the challenges presented by inverter-based resource (IBR) integration by registering bulk power system (BPS)-connected IBR owners and operators who were previously not required to adhere to NERC Reliability Standards. In May 2025, the ERO Enterprise entered the third and final milestone of this initiative, in which registration takes place. The ERO Enterprise has provided various resources, including webinars, infographics, quarterly updates, and informational videos, throughout the initiative to assist asset owners and operators in understanding the changes and how they are affected. This document aims to help answer frequently asked questions regarding the registration process occurring between May 2025 and May 2026 for possible Category 2 Generator Owner (GO) and Category 2 Generator Operator (GOP) entities.



Frequently Asked Questions (FAQ)

Question: What sections of the NERC Rules of Procedure pertain to the NERC registration process?

Answer: Requirements and activities for the Organization Registration Program are addressed in the following FERC-approved [NERC Rules of Procedure \(ROP\)](#) documents:

- ROP, Section 500 | Organization Registration and Certification
- Appendix 2 | Definitions Used in the ROP
- Appendix 5A | Organization Registration and Certification Manual
- Appendix 5B | Statement of Compliance Criteria
- Appendix 5C | Procedure for Requesting and Receiving an Exception from the Application of the NERC Definition of BES

Question: What sections of the ROP include revised definitions of a “Generator Owner” and “Generator Operator?”

Answer: Appendices 2 and 5B of the ROP have been updated to include definitions for both Category 1 and Category 2 GO and GOP.

Question: How do the Regional Entities fit into the picture of NERC and registration?

Answer: The Federal Energy Regulatory Commission (FERC) certified NERC as the designated Electric Reliability Organization (ERO) in 2006, charging it with developing and enforcing Reliability Standards, analyzing current and future trends and system events, and recommending improved practices.

The ERO Enterprise is comprised of NERC and its six Regional Entities, working collaboratively to ensure the reliability of the North American grid. NERC delegates certain of its statutory functions to the Regional Entities under FERC-approved Regional Delegation Agreements. At a practical level, the Regional Entity is the organization that has the most direct relationship with registered entities and candidates for registration.

Question: How will I know which Regional Entity applies to my company and facilities?

Answer: The Regional Entity’s jurisdiction is based on the physical location where the IBR connects to the BPS. A map of the boundaries of the Regional Entities and links to their respective websites can be found on NERC’s Key Players page. The facility owner who provides the BPS interconnection to the IBR facility can provide candidates with applicable Regional Entity information. Some candidates may have facilities in multiple Regional Entity footprints.

NERC and the Regional Entities are working with entities throughout 2025–2026 (and thereafter to the extent necessary) as entities evaluate whether Category 2 GO and GOP Registry Criteria would apply and to determine the appropriate Regional Entity.

Question: When will the Regional Entity with jurisdiction over the area(s) in which an entity owns or operates contact me to receive the supporting documentation needed to complete a Category 2 registration review?

Answer: Your organization should have already been contacted by the appropriate Regional Entity, if your organization was on the list for owning or operating a possible Category 2 asset. If you have not established contact with a Regional Entity, please reach out to appropriate Regional Entity for your facility.

Question: When will candidates be required to register?

Answer: NERC and the Regional Entities began processing Category 2 registrations in batches in August 2025 and will continue through April 2026. Each Regional Entity is managing the applicable timeframes to initiate registration for owners and operators of each Category 2 facility in its area. When completed,

your organization will receive a NERC registration notification stating your entity will be listed on the NERC Compliance Registry with an effective registration date of May 15, 2026.

Question: What if I think I have a generation asset that possibly meets the registration criteria, but I have not been contacted to provide information as part of the Category 2 evaluation process?

Answer: Please reach out to [NERC Registration](#) and we will assist you with identifying the appropriate Regional Entity.

Question: What type of documentation do I need to supply the Regional Entity as part of the Category 2 Request for Information Response?

Answer: Your organization will be required to submit the following documents through a secure environment, such as an extranet site or through the Centralized Organization Registration ERO System (CORES):

- A completed ERO Enterprise GO/GOP Asset Verification Form
- Interconnection Agreement (and amendments, if applicable)
- Operating or Third-Party Agreements
- Operating One-Line Diagrams that depicting the Generation Resource(s) through to the Point of Interconnection with the Transmission Owner (TO) or Distribution Provider (DP)
- Nameplate Data for the individual Inverters or Wind Turbines

Question: Why do I need to provide data to the Regional Entity and initiate the Registration process now? Can I wait until May 2026?

Answer: The entity needs to provide data to the Regional Entity and initiate NERC registration within the timeframes requested to allow for adequate time to complete registration assessments and the registration process. Due to the large number of identified potential Category 2 facilities, it is important that entities cooperate in a timely manner to satisfy the FERC-mandated deadline.

Additionally, entities' prompt engagement and timely participation in the registration process will provide them with the regulatory certainty needed for the May 2026 compliance date and support the ERO Enterprise's shared goal of a reliable, secure, and resilient grid.

Question: I have Category 2 facilities in more than one Regional Entity and have been given different timeframes to complete registration from each Regional Entity. Can I wait until the latest date and complete Registration in all the Regional Entities at the same?

Answer: The entity needs to take the requested action within each Regional Entity's timeframe. Due to the large volume of work and the need to complete all Category 2 Registrations by May 2026, it is not always possible to complete registration requests in multiple Regional Entities at the same time. In such

situations, the entity will receive a notification letter from NERC when a Category 2 GO or GOP Registration request is approved by each Regional Entity.

Question: My organization is not comfortable sharing information about my Category 2 facilities with the Regional Entity without a Non-Disclosure Agreement (NDA). Is an NDA required prior to sharing data with the Regional Entity?

Answer: No, NDAs between candidates for registration, registered entities, and the Regional Entities are not required. The Regional Entities adhere to the NERC [ROP Section 1500](#), Confidential Information, which explains the obligations that Regional Entities and NERC have to protect Confidential Information submitted to it by owners, operators, and users of the BPS.

Question: If my organization performs its own self-analysis and determines that our facility does not meet the registration criteria, do we still need to provide the requested supporting documentation to the Regional Entity?

Answer: Yes, your organization still needs to submit all requested documents to the Regional Entity. Once the formal evaluation review has been completed, the Regional Entity will then communicate if your generation asset does or does not meet registration criteria.

Your organization is encouraged to review all available resources that will assist you with applying the registration criteria. Some available resources include:

- [BES Definition Reference Document](#)
- [Application of the Registration Criteria for Category 2 GO/GOP IBRs](#)
- [Application of the BES Definition to Battery Energy Storage Systems and Hybrid Resources](#)

If you have any questions, please contact your applicable Regional Entity. If you are unsure who to contact, please reach out to NERC Registration who will assist you with identifying the appropriate Regional Entity.

Question: What if my generation asset does not meet the Category 2 GO definition on its own, but my facility aggregates with other facilities to a 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?

Answer: If multiple facilities aggregate to a nameplate capacity of greater than or equal to 20 MVA at a common point of connection at a voltage greater than or equal to 60 kV with other facilities, all facilities will be determined to be Category 2 assets, and all the owners and/or operators will need to register with NERC and the Regional Entity.

Question: What if my generation project is coming on-line in phases and will possibly meet the Category 2 GO/GOP criteria during the initial phase(s) and will eventually meet the Category 1 GO/GOP criteria once

additional phases reach Commercial Operations Date? Do I need to submit registration information initially as a Category 2?

Answer: Yes, your organization will need to start conversations and provide registration application information as early as possible with your applicable Regional Entity.

Question: If my organization has a facility that has been determined to meet the Category 2 GO registration criteria, will my organization need to move forward with NERC registration if my organization hasn't determined who will be our Category 2 GOP in the future?

Answer: If a GO has not yet determined who will be its GOP, the Regional Entity will advise the GO to register as both the Category 2 GO and GOP until there is more clarity on who will assume the GOP role in the future. Once a designated GOP has been determined for the entity, the Regional Entity will work with you to revise the applicable registrations accordingly.

Question: What if my organization has a GOP contract that is coming to an end and a new GOP contract with a different GOP provider is being implemented with a future effective date?

Answer: The GO will document the new GOP within its GO/GOP Asset Form and provide the new Operations and Maintenance agreement in CORES. Let the Regional Entity know if you have any questions about how to document your GOP for your specific situation.

Question: Where can I find a list of potential applicable NERC Reliability Standards for candidates who will be subject to registration as a Category 2 GO and GOP?

Answer: The [Reliability Standards Compliance Dates for Generator Owners & Generator Operators](#) document is updated quarterly and includes all finalized and pending compliance dates for the applicability and enforceability of individual Reliability Standards applicable to Category 2 GO and GOP registration.

Question: Where can I find resources to help me as a new entity?

Answer: NERC has developed numerous resources as part of a broader effort to welcome new participants into the ERO Enterprise and provide the tools and guidance needed to support reliability and compliance from the start. All of these resources are available on the [IBR Registration Initiative page](#) on NERC's website, a frequently updated project hub that allows stakeholders to easily locate key project updates and resources, as well as the [Registration page](#).

We encourage you to explore these resources and become actively involved in the ongoing efforts to enhance grid reliability today and in the future. Your input and expertise are invaluable as we work together to reliably integrate IBRs into the BPS.

Question: Can Category 2 GO and GOP entities be part of the Coordinated Oversight Program?

Answer: Yes, entities can modify an existing Coordinated Oversight Program or apply for the Coordinated Oversight Program regardless of their registered function type(s), but the organization must be in at least two or more Regional Entities to apply. You can find information about modifying an existing Coordinated Oversight Program or possibly joining a Coordinated Oversight Program on NERC's website under [CMEP Resources](#). Note that any changes due to the new Category 2 GO and GOP registrations will not be formally processed until the registration effective date of May 15, 2026.

Question: Do I need to begin submitting Generating Availability Data System (GADS) information after I receive my registration letter from NERC?

Answer: No, Category 2 entities are not required to submit GADS information until May 15, 2026.

Question: I received a notification that I need to complete a Reporting Confirmation for 2026. Is this required?

Answer: Technically no; however, even though you are not yet required to submit GADS data, please submit the Reporting Confirmation to indicate if your entity meets the GADS reporting criteria, available on the [NERC website](#). Although you technically do not need to complete the Section 1600 confirmation until May, we recommend completing it now while it is fresh in your mind.

Question: What is the Electricity Information Sharing and Analysis Center (E-ISAC), and how does it benefit my organization?

Answer: The E-ISAC reduces risk to the electricity industry across North America by providing quality information and analysis on cyber and physical threats. It includes a community of more than 1,500 utilities. An E-ISAC membership is a free benefit of NERC Registration. For more information about E-ISAC membership, please visit the [E-ISAC Website](#) or contact the E-ISAC via email at memberservices@eisac.com.