PRC-029-2 RIDE-THROUGH: NERC GUIDANCE AND ENFORCEMENT DISCRETION

The ERO Enterprise (NERC and the Regional Entities) published the **CMEP Practice Guide: PRC-029-1 Enforcement Discretion** on August 10, 2026 and revised it on September 9, 2026. The guide addresses the design requirements of PRC-029 Requirements R1-R3, the frequency and voltage ride-through standard for inverter-based resources (IBRs), and describes an enforcement discretion framework for Generator Owners that cannot secure the resources to implement settings before their compliance date. PRC-029-2 took effect October 1, 2026 (PRC-029-1 retired immediately prior); its implementation plan says the R1-R3 phase-in is "carried forward unchanged." This page summarizes what the revised guide says and the steps the framework involves.

REVISED CMEP GUIDE · SEPTEMBER 9, 2026

Design includes field implementation of settings

- The guide notes the standard separates **capability-based (design)** from **performance-based (operational)** elements. The Practice Guide states that "'design' necessitates the physical implementation and configuration of these settings on active units." Conforming settings developed on paper, but not installed, do not attain the design element.
- This is how CMEP staff will read the design element. The operation elements of R1-R3 still phase in with PRC-028-1 disturbance monitoring, as the PRC-029-2 Implementation Plan states. The design compliance dates are unchanged: **October 1, 2026** for BES IBRs and **January 1, 2027** for non-BES IBRs.
- The guide also notes the reliability reason implementation requires OEM support: incorrectly applied settings without OEM validation "may cause equipment failure or unexpected tripping during grid disturbances, achieving the exact opposite of the standard's intent."

ENFORCEMENT DISCRETION

Relief where OEM, vendor or any other resources cannot be secured

- Where a registered entity "seek[s], but [is] unable to secure, resources before the applicable design compliance date," the revised guide states the ERO Enterprise "will use such enforcement discretion" for the design aspects of R1-R3. The August clause read "OEM/vendor resources"; the revision asks only whether the **resources** could be secured. **OEM and vendor delay remains the central case**, named in the guide's barriers and in the records CMEP staff review, but the clause is no longer written to that case alone.
- Broader than Compliance Exceptions or Find, Fix, Track, and Report: it "involves no processing of the potential noncompliance" and "has no impact on the registered entity's compliance history."
- The barriers the guide recognizes: a **limited vendor pool** of inverter manufacturers and vendors; **proprietary settings and software**, where Generator Owners generally hold neither the intellectual property rights nor the software access to implement internal inverter settings; and **outage scheduling limits** during peak demand and other grid conditions.
- The window is finite: discretion "will end on October 1, 2028, for BES IBRs and January 1, 2029, for non-BES IBRs." Uses are reported in the ERO's semi-annual program reports and NERC "will review all instances of enforcement discretion to ensure consistent application," though the ERO "will not review or reevaluate the exercise" itself.

WHAT NERC EXPECTS

Notification, tracking, and documentation

Registered entities "must notify their Regional Entity prior to their compliance date": October 1, 2026 for BES IBRs, January 1, 2027 for non-BES IBRs, on NERC's posted tracker workbook. A footnote gives Regional Entities "discretion where appropriate" to apply it "when notice is given after the compliance date," so a BES IBR notice sent after October 1, 2026 is at the Regional Entity's discretion.

- **The tracker is completed per unit:** IBR name, BES/non-BES type, location, MVA, OEM, commercial operation date, and planned setting-implementation date, plus entity registration details and a narrative of OEM, vendor, or contractor interactions, agreements, and contracts, with supporting records available on request.
- **What CMEP staff review:** staff will seek to understand two things: "Barriers to timely compliance, e.g., communications between the registered entity and the OEM/vendor" and the size and location of the IBRs at issue.
- **Eligibility note for newer units:** the tracker states that "CODs on or after 10/1/2026 may not be eligible for enforcement discretion," with Regional Entity contact required for any such submittal.

Before the compliance date

Entities seeking discretion notify their Regional Entity before the compliance date; a late BES notice (after Oct 1, 2026) is at its discretion.

Oct 1, 2026

Design compliance date for BES IBRs: conforming ride-through settings implemented and configured on active units.

Jan 1, 2027

Design compliance date for non-BES IBRs, same standard of attainment.

Oct 1, 2028 / Jan 1, 2029

Enforcement discretion ends (BES / non-BES respectively); dates fixed in the September 9, 2026 revision.

Sources (all quotations verbatim): Revised ERO Enterprise CMEP Practice Guide: PRC-029-1 Enforcement Discretion (September 9, 2026; first issued August 10, 2026) · ERO Enterprise Enforcement Discretion Tracker · NERC Implementation Plan, PRC-029-2 (August 2026) · FERC letter order approving PRC-029-2, Docket RD26-10-000 (September 30, 2026) · FERC Order No. 909, 90 FR 35599 (July 29, 2025) · Texas RE NSRF: PRC-028-1 & PRC-029-1 Implementation (March 26, 2026) · PRC-029-2 standard text · PRC-029-1 Technical Rationale (July 2024)

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