READING A NERC COMPLIANCE DEADLINE: WHY "THREE CALENDAR YEARS" IS NOT THREE YEARS

NERC implementation plans usually state an obligation as a **period** rather than a date. "Three calendar years", "15 calendar months", "nine months" and "annual" are four different instructions, and they are not applied uniformly even within a single plan. Reading one of them as ordinary date arithmetic can move a compliance deadline by months in either direction. This briefing sets out how the terms are applied, using **PRC-028-1** as the worked example, and shows the two places its dates are most often misread.

THE PROBLEM · PERIODS, NOT DATES

A period is an instruction, not a subtraction

- An implementation plan sets the compliance date for a new or revised Reliability Standard. Where the obligation phases in, the plan typically expresses it relative to the standard's **effective date** or to a facility's **commercial operation date (COD)**.
- The words matter. **"Calendar month"** and **"calendar year"** are terms of art with published ERO guidance behind them. Plain **"months"** and **"years"** are not the same instruction.
- The ERO Enterprise publishes a CMEP Practice Guide on **"Annual" and "Calendar Month(s)"** (April 19, 2019) that tells compliance staff how to assess these terms. It supersedes the retired CAN-0010.
- Read the guide's scope carefully: it addresses the **periodicity** with which a recurring activity must take place. It is not, on its face, written for a one-time compliance date measured from a fixed effective date.
- The same phrasing recurs across the IBR standards, so the reading generalizes: PRC-028-1 and PRC-029-2 both set schedules relative to an effective date, a commercial operation date or an in-service date.
- The consequence is practical. A milestone read nine months late is nine months of remediation lead time an owner believes it has and does not.

THE CONVENTION · WITH NERC'S OWN EXAMPLES

Calendar months run to the end of the month

For periodicity requirements, compliance is assessed on whether the activity was completed "by the last calendar day of the calendar month X months from previous review or activity", rather than by parsing specific calendar days.

- The anchor's day of the month is therefore irrelevant, and the anchor month itself is not counted.
- **The guide's first example.** Documentation reviewed **June 15, 2018** under a 15-calendar-month cycle: the next review is due no later than **September 30, 2019**.
- **The guide's second example.** A risk assessment performed **August 10, 2017** under a 30-calendar-month cycle: the next is due no later than **February 29, 2020**.
- For **"annual"** where a standard leaves it undefined, an entity documents either a **calendar year** (January 1 to December 31) or a **rolling 12 months**, and applies that choice either across all such standards or standard by standard. CMEP staff assess against whichever choice was documented.

THE METHOD · WHERE TO LOOK, IN ORDER

Three sources, and the order is not negotiable

- **1. The implementation plan itself, including its own worked examples.** Plans frequently illustrate a period with a concrete date. Where they do, that example governs, and it can depart from the general convention.
- **2. The Regional Entity's published rendering.** The Regional Entity audits, and its published materials often convert a relative period into a concrete date the plan leaves open.
- **3. The CMEP Practice Guide.** The general convention, applied where nothing more specific speaks.
- The guide is explicit about its own limits: it "does not supersede or change any language contained in a Standard". Where a standard or its plan speaks directly, that language governs.
- Where sources conflict, say so and plan to the earlier date. A deadline computed one way and defended another way is not a compliance position.
- Write the reading down. Record which document produced each date and which period language it turned on, so the next person to open the file does not silently recompute it a different way.
- Two internal files agreeing is not verification if one was copied from the other. Trace each date to the plan or to the Regional Entity, not to a prior summary of them.

Apr 1, 2025
PRC-028-1 effective. PRC-002 ceases to apply to IBRs.

Jan 1, 2026
R8, BES IBRs, any COD. Nine months after effective.

Jul 1, 2026
BES IBRs with a COD within 15 calendar months of effective.

Apr 1, 2027
R8, non-BES IBRs, any COD.

Dec 31, 2028
50 percent of BES IBRs on R1-R7 (Texas RE).

Jan 1, 2030
100 percent of BES and non-BES IBRs on R1-R7.

Sources: NERC Implementation Plan, Project 2021-04, Reliability Standards PRC-002-5 and PRC-028-1 (September 2024); ERO Enterprise CMEP Practice Guide, Implementation of "Annual" and "Calendar Month(s)" in the Reliability Standards (April 19, 2019); Texas RE NSRF, "PRC-028-1 & PRC-029-1: Implementation Plans & Data Submittals" (March 26, 2026) for the December 31, 2028 rendering.

Educational material, not compliance advice.

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PRC-028-1 WORKED OUT: THE DATES, AND THE TWO PLACES THEY ARE MISREAD

PRC-028-1 took effect **April 1, 2025** for both categories; the categories differ in their compliance schedules, not in when the standard became effective. The plan phases R1 through R7 by category and by commercial operation date, and sets R8 separately. Below is the schedule, followed by the two provisions that are most often read wrong.

BES IBRS · CATEGORY 1

Phased, with one exception

- **COD on or before April 1, 2025.** 50 percent of an entity's BES IBRs comply with R1 through R7 within three calendar years (Texas RE: **December 31, 2028**; same-day reading: April 1, 2028), and 100 percent by **January 1, 2030**.
- **COD after April 1, 2025, within 15 calendar months of the effective date.** 100 percent comply within that window.
- **COD after that window.** 100 percent comply by the commercial operation date.
- **R8, regardless of COD.** Comply by **January 1, 2026**, which is nine months after the effective date.
- The 50 percent milestone is measured across **an entity's** BES IBRs, not per facility, so which sites make the first tranche is an entity-level choice.
- An entity required to monitor only one BES IBR is the exception to the phase-in. See the third column.

BES IBR

Which category a facility falls in is a **registration determination** under the NERC BES definition. The implementation plan does not restate it; the plan keys its schedule off it. Confirm the category before computing the date.

NON-BES IBRS · CATEGORY 2

No interim percentage

- **COD on or before May 15, 2026.** 100 percent comply with R1 through R7 by **January 1, 2030**. There is no 50 percent milestone in this category.
- **COD after May 15, 2026, within 15 calendar months of the effective date.** 100 percent comply within that window.
- **COD after that window.** 100 percent comply by the commercial operation date.
- **R8, regardless of COD.** Comply by **April 1, 2027**.
- With no interim milestone, a non-BES fleet lands entirely on **January 1, 2030**. That concentrates the work rather than reducing it.
- R8 sits **15 months later** for non-BES than for BES, January 1, 2026 against April 1, 2027, so the two categories sequence differently even where the R1-R7 dates look similar.

NON-BES IBR

The plan defines these directly: IBRs that have or contribute to **20 MVA or more** of aggregate nameplate, connected through a system designed primarily to deliver it to a common point of connection at **60 kV or above**.

THE TWO MISREADINGS

Where the dates go wrong

First: an entity required to monitor only one BES IBR has no phase-in at all. The plan states it in its own sentence, and it is easy to miss in a table built around the 50/100 split.

- An entity "required to monitor only one (1) BES Inverter-Based Resource" complies with R1 through R7 **at 100 percent** within three calendar years: **December 31, 2028** as Texas RE renders it, April 1, 2028 under the plan's same-day convention.
- **Second: the two period types can resolve differently.** Texas RE renders "three calendar years" from April 1, 2025 as **December 31, 2028**; the plan's same-day convention gives **April 1, 2028**, nine months earlier. Elsewhere, plan to April 1, 2028 unless your Regional Entity has published the later date.
- The 15-calendar-month window is the other place the sources diverge. The plan's own worked example renders it same-day, giving **July 1, 2026**; the Regional Entity's published summary footnotes the same period to the CMEP Practice Guide, whose end-of-month convention would give July 31, 2026.
- Where that 30-day difference matters, plan to the earlier date and document which reading you relied on.

Extensions

A GO with IBRs operating before the effective date may ask its CEA for an extension if circumstances beyond its control prevent DME installation, with a plan and timetable, no later than three months before the compliance date.

R8 comes early

Within PRC-028-1, R8 is the first BES obligation at January 1, 2026, well ahead of the 50 percent R1 through R7 milestone for BES IBRs already in service.

Not only PRC-028

PRC-029-2: R1-R3 design by Oct 1, 2026 (BES) or Jan 1, 2027 (non-BES); R4 documentation by Oct 1, 2027 for IBRs in service, and already subject to the GO's compliance obligations, by Oct 1, 2026.

Check the registration

Category, COD and registration scope together determine the date. Any one of the three read wrong changes the answer.

Sources: NERC Implementation Plan, Project 2021-04 (September 2024), for all categories, commercial-operation buckets and requirement dates; Texas RE NSRF, "PRC-028-1 & PRC-029-1: Implementation Plans & Data Submittals" (March 26, 2026), for the concrete rendering of the three-calendar-year milestone; PRC-029-2 Implementation Plan. Educational material, not compliance advice.

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