

## Project QC-2026-06

### Project 2024-01 – Rules of Procedure by the NERC – Definitions Alignment (Generator Owner and Generator Operator)

#### 1. PROJECT PRESENTATION

##### 1.1. Applicability

The following table lists the functional entities to which the project proposed for adoption (the “Reliability Standard”), applies.

Standards	Covered functions
IRO-010-5	Reliability Coordinator (RC) Balancing Authority (BA) Generator Owner (GO) Generator Operator (GOP) Transmission Operator (TOP) Transmission Owner (TO) Distribution Provider (DP)
MOD-032-1	Balancing Authority (BA) Generator Owner (GO) Load Serving Entity (LSE) Planning Authority and Planning Coordinator (PC) Resource Planner (RP) Transmission Owner (TO) Transmission Planner (TP) Transmission Service Provider (TSP)
PRC-012-2	Reliability Coordinator (RC) Planning Authority and Planning Coordinator (PC) Transmission Owner (TO) Generator Owner (GO) Distribution Provider (DP)
TOP-003-6.1	Transmission Operator (TOP) Balancing Authority (BA) Generator Owner (GO) Generator Operator (GOP) Transmission Owner (TO) Distribution Provider (DP)
VAR-002-4.1	Generator Owner (GO) Generator Operator (GOP)

Following decision D-2026-010 from docket R-4314-2025 of the Régie de l'énergie, four (4) new entities and four (4) new facilities have been added to the Registry. These entities and facilities are now designated as Category 2 GO and GOP and are, in principle, subject to the five (5) standards covered by this project. However, it is proposed to remove two (2) of these entities and two (2) of these facilities from this file, as explained in section 1.4 of this document.

## 1.2. Purpose of the standards

This section presents the purpose of each standard covered by this request. The title and purpose of each standard are presented below.

- **IRO-010-5 – Reliability Coordinator Data and information Specification and Collection:** To prevent instability, uncontrolled separation, or Cascading outages that adversely impacts reliability by ensuring each Reliability Coordinator has the data and information it needs to plan, monitor and assess the operation of its Reliability Coordinator Area.
- **MOD-032-1 – Data for Power System Modeling and Analysis:** To establish consistent modeling data requirements and reporting procedures for development of planning horizon cases necessary to support analysis of the reliability of the interconnected transmission system.
- **PRC-012-2 – Remedial Action Schemes:** To ensure that Remedial Action Schemes (RAS) do not introduce unintentional or unacceptable reliability risks to the Bulk Electric System (BES).
- **TOP-003-6.1 – Transmission Operator and Balancing Authority Data and Information Specification and Collection:** To ensure that each Transmission Operator and Balancing Authority has the data and information it needs to plan, monitor, and assess the operation of its Transmission Operator Area or Balancing Authority Area.
- **VAR-002-4.1 – Generator Operation for Maintaining Network Voltage Schedules:** To ensure generators provide reactive support and voltage control, within generating Facility capabilities, in order to protect equipment and maintain reliable operation of the Interconnection.

## 1.3. Regulatory context

### i. NERC Project 2024-01 – Rules of Procedure by the NERC – Definitions Alignment (Generator Owner and Generator Operator)

As part of the NERC Project 2024-01, an analysis conducted by NERC concluded that eight (8) reliability standards in force in the United States did not use restrictive language, including exclusive references to power generation and transmission system facilities preventing their immediate application to Category 2 GO/GOP facilities, i.e., power sources connected by means of non-BES IBRs.

Therefore, in accordance with section 85.6 of the Act respecting the Régie de l'énergie (hereinafter, the "Act"), the Coordinator submits for adoption by the Régie de l'énergie (hereinafter, the "Régie") the five (5) standards applicable in Quebec, namely standards IRO-010-5, MOD-032-1, PRC-012-2, TOP-003-6.1 and VAR-002-4.2 of draft 2024-01 (Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) of the North American Electric Reliability Corporation (hereinafter, the "NERC"), which will apply to Category 2 generating facility owners (hereinafter, the "GO") and generating facility operators (hereinafter, the "GOP"), as approved in the Registry by the Régie in decision D-2026-010 of the file R-4314-2025.

Pursuant to Section 85.6 of the *Act Respecting the Régie de l'énergie* (the "Act"), the Reliability Coordinator submits for adoption by the Régie de l'énergie (the "Régie") the five (5) standards applicable in Quebec, namely standards IRO-010-5, MOD-032-1, PRC-012-2, TOP-003-6.1 and VAR-002-4.2 of project 2024-01<sup>1</sup> (Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) from the North American Electric Reliability Corporation ("NERC"), which will apply to Category 2 Generator Owner

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<sup>1</sup>The full scope of NERC Project 2024-01 can be found at: <https://www.nerc.com/standards/reliability-standards-under-development/2024-01-rules-of-procedure-definitions-alignment-generator-owner-and-generator-operator>

(hereinafter, the “GO”) and Generator Operator GOP (hereinafter, the “GOP”), as approved in the Registry by the Régie in decision D-2026-010<sup>2</sup> of the file R-4314-2025.

However, three (3) standards included in NERC's Project 2024-01 are not part of this project. Standard BAL-001-TRE-2 is not submitted for adoption because it applies only to ERCOT interconnection. As for standard PRC-017-1, it is in effect in the United States, but is in the final stages of being phased out following its consolidation into standard PRC-005. In Quebec, standard PRC-017-1 has not been adopted, as the Régie has already selected standard PRC-005-2 to govern the requirements for the maintenance of protection systems, including those related to network automation, as established in decision D-2016-150<sup>3</sup>, which subsequently evolved into PRC-005-6, in effect in Quebec since April 1, 2021<sup>4</sup>. Finally, regarding the VAR-001-4.2 standard, it targets TOs in general but only applies to GOs within the WECC interconnection. Consequently, this standard is not part of the present project.

As presented in docket R-4314-2025 and endorsed by the decision D-2026-010 of the Régie, the NERC project 2024-01 resulted in changes to the Glossary, including updates to the GO and GOP definitions as well as the addition of the SERMO definition. These changes were also incorporated into the Registry to reflect the revised GO and GOP definitions, including categories 1 and 2. Given the recent changes to the GO and GOP definitions, the Coordinator considers it appropriate to present the standards covered by this project to the entities now included in these definitions, as they will be subject to compliance with the standards listed in section 1.2.

## ii. Affected reliability standards in Québec

The affected Reliability Standards adopted by the Régie, and which content and version remain unchanged, are standards IRO-010-5, MOD-032-1, PRC-012-2, TOP-003-6.1 and VAR-002-4.1. Their effective dates are as follows:

Standards	Decision	Effective date
IRO-010-5 TOP-003-6.1	D-2024-096 <sup>5</sup>	April 1st, 2026
MOD-032-1	D-2016-195 <sup>6</sup>	R1 : April 1st, 2027 R2 to R4 : January 1 <sup>st</sup> 2018
PRC-012-2	D-2020-131 <sup>7</sup>	January 1st 2021
VAR-002-4.1	D-2020-131 <sup>8</sup>	January 1st 2021

<sup>2</sup>Decision D-2026-010, Docket R-4314-2025 from the Régie de l'énergie, retrieved on April 14, 2026 from: [https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4314-2025/doc/R-4314-2025-A-0009-Dec-Dec-2026\\_02\\_10.pdf](https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4314-2025/doc/R-4314-2025-A-0009-Dec-Dec-2026_02_10.pdf) (in French only).

<sup>3</sup>Decision D-2016-150 from the Régie de l'énergie, retrieved on April 14, 2026 from: <https://www.regie-energie.qc.ca/storage/app/media/entites-visees-normes-de-fiabilite/normes-de-fiabilite/D-2016-150.pdf> (in French only).

<sup>4</sup>Decision D-2020-167 from the Régie de l'énergie, retrieved on April 14, 2026 from: [https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4070-2018/doc/R-4070-2018-A-0046-Dec-Dec-2020\\_12\\_11.pdf](https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4070-2018/doc/R-4070-2018-A-0046-Dec-Dec-2020_12_11.pdf) (in French only).

<sup>5</sup>Decision D-2024-096 from the Régie de l'énergie, retrieved on April 14, 2026 from: [https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4255-2024/doc/R-4255-2024-A-0013-Dec-Dec-2024\\_09\\_13.pdf](https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4255-2024/doc/R-4255-2024-A-0013-Dec-Dec-2024_09_13.pdf) (in French only).

<sup>6</sup>Decision D-2016-195 from the Régie de l'énergie, retrieved on April 14, 2026 from: <https://www.regie-energie.qc.ca/storage/app/media/entites-visees-normes-de-fiabilite/normes-de-fiabilite/D-2016-195.pdf> (in French only).

<sup>7</sup>Decision D-2020-131 from the Régie de l'énergie, retrieved on April 14, 2026 from: [https://www.regie-energie.qc.ca/storage/app/media/entites-visees-normes-de-fiabilite/normes-de-fiabilite/PRC-012-2\\_FR\\_20201112.pdf](https://www.regie-energie.qc.ca/storage/app/media/entites-visees-normes-de-fiabilite/normes-de-fiabilite/PRC-012-2_FR_20201112.pdf) (in French only).

<sup>8</sup>Decision D-2020-131 from the Régie de l'énergie, retrieved on April 14, 2026 from: <https://www.regie-energie.qc.ca/storage/app/media/entites-visees-normes-de-fiabilite/normes-de-fiabilite/D-2020-131.pdf> (in French only).

#### 1.4. Specific provisions for Québec

The Coordinator proposes carrying over the Québec-specific provisions (including applicability) including the scope and specific provisions of the reliability standards currently in force, as well as the one already adopted by the Régie in paragraph 285 of decision D-2024-060<sup>9</sup>, which includes the following specific provision under Applicability:

When applying this standard, any reference to the terms Bulk Electric System or BES shall be replaced by the terms Main Transmission System or RTP, respectively.

The Coordinator is of the opinion that this specific provision is still applicable since the scope of application equivalent to the BES for Québec and recognized by the Régie is the RTP.

#### 1.5. Proposed effective dates

In the United States, the NERC project 2024-01<sup>10</sup> implementation plan proposes that newly categorized entities as category 2 GO or GOP comply with the Reliability Standards IRO-010-5, MOD-032-1, PRC-012-2, TOP-003-6.1, and VAR-002-4.1 by the date of their registration in the Registry, May 15, 2026<sup>11</sup>.

Given the importance of having standardized practices, with effective mandatory standards harmonized with the United States, the Coordinator proposes that this project come into effect on the date the GO and GOP Category 2 definitions in the Glossary come into effect, July 1, 2026<sup>12</sup>.

The Coordinator considers that NERC's implementation plan meets the Régie's requirement that standards come into force on the first day of a calendar quarter<sup>13</sup> with at least 60 days<sup>14</sup> between the date of the standard's adoption and its effective date. One of the entities has indicated that it will not be able to comply with the requirement before October 1<sup>st</sup>, 2026. As this timeline is deemed reasonable, the Coordinator proposes that the affected entities will therefore be required to comply with the five (5) relevant standards by October 1<sup>st</sup>, 2026.

For certain entities and facilities, depending on the standard, the Coordinator proposes implementation timelines that are specified in the Québec appendix of the standard. These timeframes are equivalent to those granted to entities in the United States.

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<sup>9</sup>Decision D-2024-060 from the Régie de l'énergie, retrieved on April 14, 2026 from: [https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4229-2023/doc/R-4229-2023-A-0020-Dec-Dec-2024\\_06\\_20.pdf](https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4229-2023/doc/R-4229-2023-A-0020-Dec-Dec-2024_06_20.pdf) (in French only).

<sup>10</sup>Implementation plan of NERC project 2021-04, , retrieved on April 14, 2026 from: <https://www.nerc.com/standards/reliability-standards-under-development/2024-01-rules-of-procedure-definitions-alignment-generator-owner-and-generator-operator>.

<sup>11</sup>Implementation plan of NERC project 2024-01, , retrieved on April 14, 2026 from: [https://www.nerc.com/globalassets/standards/projects/2024-01/2024-01-go-gop-definitions-implementation-plan-final-ballot-clean\\_070225.pdf](https://www.nerc.com/globalassets/standards/projects/2024-01/2024-01-go-gop-definitions-implementation-plan-final-ballot-clean_070225.pdf)

<sup>12</sup>Decision D-2026-010, , retrieved on April 14, 2026 from: [https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4314-2025/doc/R-4314-2025-A-0009-Dec-Dec-2026\\_02\\_10.pdf](https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4314-2025/doc/R-4314-2025-A-0009-Dec-Dec-2026_02_10.pdf) (in French only).

<sup>13</sup>. In Decision [D-2015-168](#), the Régie set the effective date of standards as the first day of the calendar quarters following the date of adoption.

<sup>14</sup>. In Decision [D-2016-011](#), the Régie set a minimum of 60 days between the adoption of standards and their effective date.

## 1.6. Standard to retire

No standard to retire.

## 1.7. Modifications to the Glossary

No changes to the Glossary. The new GO and GOP definitions of categories 1 and 2 of docket R-4314-2025, including criteria adapted to the context of Quebec in accordance with section 85.3 of the Act, have been added to the Glossary and will be in force in Quebec on July 1, 2026.

## 1.8. Modifications to the Register

According to Decision D-2026-010<sup>15</sup>, within the framework of file R-4314-2025, the Registry included four new entities and four new facilities identified as Category 2 GOs and GOPs and has been in effect since March 9, 2026.

During the initial analysis of the entities and facilities as part of public consultation 2025-02<sup>16</sup>, and in the absence of any contrary comments, it was presumed that the Mont Copper and Mont Miller facilities held Type 3 and 4 wind resources, justifying their inclusion in this category. However, prior to the public consultation on this project, discussions with the newly added entities in the Registry, and subsequent validations with Mount Copper, LP and Énergie éolienne du Mont Miller société en commandite, confirmed that these facilities only include Type 1 and 2 wind resources. Since the GO and GOP Category 2 qualification only applies to Type 3 and 4 resources, an adjustment to the Registry is required. Consequently, the table below summarizes the entities and facilities that will be removed from the Registry.

Registered entities to retire	Production facilities
Mount Copper, LP (MTC)	Mount Cooper
Énergie éolienne du Mont Miller société en commandite (ÉMM)	Mount Miller

## 2. ASSESSMENT OF RELEVANCE

FERC Order 901 further emphasized the need for a comprehensive set of reliability standards requirements covering all aspects of the performance, operation, and planning of IBRs. The arrival of new category 2 of GO and GOP IBRs expands the scope of responsibilities related to data collection, modeling, network automation, and voltage control, which are central to the standards addressed by this project.

In Quebec, the requirement for these entities to comply with standards IRO-010-5, MOD-032-1, PRC-012-2, TOP-003-6.1, and VAR-002-4.1 stems primarily from a need for regulatory consistency with the North American framework established by the NERC. Alignment with these standards ensures consistency in reliability practices across different interconnections, thereby facilitating operational coordination and a shared understanding of applicable requirements. These standards are not new, isolated requirements but are part of a body of standards already adopted in Quebec. They are either already in effect or in the process of being implemented for other entities and facilities listed in the Registry, according to regulatory

<sup>15</sup> Decision D-2026-010, retrieved on April 14, 2026 from [https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4314-2025/doc/R-4314-2025-A-0009-Dec-Dec-2026\\_02\\_10.pdf](https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4314-2025/doc/R-4314-2025-A-0009-Dec-Dec-2026_02_10.pdf) (in French only).

<sup>16</sup> Public consultation of project 2025-02, retrieved on April 14, 2026 from: <https://www.hydroquebec.com/reliability-coordinator/documentation/consultation.html>

decisions and timelines specific to each. In this context, their application to Category 2 GO and GOP entities aims to ensure regulatory fairness and the uniform application of obligations.

The New Brunswick Energy and Utilities Board did not approve this project, as it does not introduce any new standard and only expands the scope of applicability to category 2 GO and GOP entities<sup>17</sup>. The same applies to the Ontario Energy Board, which did not approve the project for the same reasons.<sup>18</sup>

Given the information outlined above about project 2024-01, and the fact that these standards were developed by organizations recognized in North America (including in Québec and neighbouring jurisdictions) in accordance with the agreement signed in 2009 by the Régie, NERC and the NPCC with the authorization of the Québec government<sup>19</sup>, the Coordinator is of the opinion that the compliance of the entities targeted by the changes developed above contributes to the reliability of the Quebec network and to harmonization with neighbouring networks.

### 3. PRELIMINARY IMPACT ASSESSMENT

This section provides the Reliability Coordinator's preliminary assessment of the impact on all Québec entities.

The Coordinator assesses that the new covered entities whose addresses are already listed in the Register should be familiar with the Reliability Standards framework. As a result, the Coordinator predicts a low impact for the 2 new entities and 2 new production facilities. However, the Coordinator anticipates a greater impact for entities that are not acquainted with NERC standards, given the expected learning curve associated with adapting to the Reliability Standards framework. To ensure compliance under this filing and to adequately prepare for upcoming standards associated with FERC Order No. 901, these entities may need to demonstrate more sustained and proactive engagement with the Reliability Standards framework in the near future. The entities in question are invited to submit their comments and observations as part of the public consultation on this project, in accordance with the terms and deadlines set out in the consultation process.

The following table provides preliminary assessments of the impacts on all Québec entities.

Standard	Impact		
	Implementation	Maintenance	Monitoring
IRO-010-5	Low	Low	Low
MOD-032-1	Low	Low	Low
PRC-012-2	Medium	Low	Low
TOP-003-6.1	Low	Low	Low
VAR-002-4.1	Low	Low	Low

<sup>17</sup> The full scope of New Brunswick Matter can be found at: <https://filemaker.nbeub.ca/fmi/webd/NBEUB%20ToolKit13>

<sup>18</sup> Ontario Energy Board (OEB) Review Process, retrieved on October 9 from <https://www.ieso.ca/en/Sector-Participants/System-Reliability/OEB-Review-Process>.

<sup>19</sup> Agreement entered into pursuant to Decree No. 443-2009 issued April 8, 2009, at [https://www.regie-energie.qc.ca/fr/participants/dossiers/R-3996-2016/doc/R-3996-2016-B-0106-Audi-Piece-2018\\_10\\_26.pdf](https://www.regie-energie.qc.ca/fr/participants/dossiers/R-3996-2016/doc/R-3996-2016-B-0106-Audi-Piece-2018_10_26.pdf) (in French only).

**Key**

**Low:** Normal industry practice or standard that only requires minor adjustments to existing processes or practices.

**Medium:** Change that requires the mobilization of some physical, human or financial resources to implement the proposed standard, enforce it or monitor compliance.

**High:** Change that requires provision and mobilization of significant physical, human or financial resources to plan and implement the proposed standard, enforce it or monitor compliance.

**4. FINAL IMPACT ASSESSMENT**

This section will be completed upon receipt of the impact assessment forms and at the conclusion of the consultation process prior to filing of the standards with the Régie.