Procedure for
Guided Self-Certification
and Self-Reporting

CP - 06

Rev. 6

The NERC Rules of Procedure and the Regional Delegation Agreement are the overriding documents that govern the implementation of the CMEP.

Owner
Assistant Vice President, Compliance

Effective Date: 9/26/2018
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Review and Re-Approval Requirements

This document will be reviewed every two years from the effective date, or as appropriate for possible revision. The existing or revised document will be re-approved by the NPCC Compliance Committee, distributed to staff and committees/working groups, as applicable, and will be posted to the NPCC website for member reference.
1.0 Introduction and Purpose

1.1 All Registered Entities within the NPCC Region are:

1.1.1 Obligated to Self-Certify compliance status with a certain subset of the NERC Reliability Standards that are applicable to the Registered Entity’s functions, and supply any evidence as requested in a Guided Self-Certification request.

1.1.2 Encouraged to Self-Report instances of possible non-compliance with all of the NERC Reliability Standards that are applicable to the Registered Entity’s functions. For Registered Entities approved for self-logging, such Registered Entities may self-log minimal risk possible non-compliance.

1.2 The goal of this procedure is to ensure consistency and transparency in both processes.

1.3 The terminology used herein is as defined by the NERC Rules of Procedure (ROP), including the Uniform Compliance Monitoring and Enforcement Program (CMEP) as described in Appendix 4C to the NERC ROP and the Definitions Used in the ROP as described in Appendix 2 to the ROP, the NERC Glossary of Terms, and the NPCC Glossary of Terms.

2.0 Compliance Staff Responsibilities

2.1 Identifying one or more Reliability Standards for a Guided Self-Certification each quarter, or on a schedule otherwise determined to be appropriate.

2.2 Developing and maintaining new or revised Guided Self-Certification forms in the CMEP Data Acquisition and Administration (CDAA) portal.

2.3 Developing the process for submitting the Guided Self-Certification forms.

2.4 Providing the Guided Self-Certification instructions and schedules to the Registered Entities.

2.5 Reviewing submitted Guided Self-Certification forms to ensure that applicable Registered Entities have met the requirements.

2.6 Ensuring that each affected Registered Entity has submitted the appropriate Guided Self-Certification forms including the signed certification statement.

2.7 Ensuring that CDAA functions properly to provide and accept Guided Self-Certification forms and Self-Report forms.

2.8 Ensuring that appropriate communications have been distributed to the Registered Entities for all CDAA enhancements.
3.0 Guided Self-Certification Process

3.1 Selection of Reliability Standard for Guided Self-Certification

3.1.1 NPCC may select one or more Reliability Standards for a Guided Self-Certification each quarter, or on a schedule otherwise determined to be appropriate.

3.1.2 NPCC shall use the Areas of Focus and Risk Elements identified in the annual ERO CMEP Implementation Plan, the NPCC CMEP Implementation Plan, and any other requirement as deemed necessary as the basis for selecting the Reliability Standards and/or requirements subject to a Guided Self-Certification.

3.2 Selection of Entities subject to the Guided Self-Certification

3.2.1 NPCC shall use the results of the Inherent Risk Assessment (IRA) and voluntary Internal Control Evaluation (ICE) to assist with the determination of which Registered Entities are subject to the Guided Self-Certification(s) for each quarter. NPCC may also receive input from Enforcement trends, audit teams, and/or NERC.

3.2.2 A Guided Self-Certification or a series or group of Guided Self-Certifications may be used in lieu of an Audit for a Registered Entity.

3.2.3 If a Registered Entity is subject to an Audit or Spot Check within the same calendar year as the Guided Self-Certification and the scope of such an Audit or Spot Check includes the Reliability Standard and requirements subject to the Guided Self-Certification, NPCC shall not include that Registered Entity in the Guided Self-Certification, unless there are facts and circumstances that warrant such inclusion.

3.2.4 If a Registered Entity has an open enforcement action for the Reliability Standard and requirements subject to the Guided Self-Certification, NPCC shall not include that Registered Entity in the Guided Self-Certification, unless there are facts and circumstances that warrant such inclusion.

3.2.5 If a Registered Entity is part of the Multi-Regional Registered Entity (MRRE) program with NPCC as an Associated Regional Entity (ARE), NPCC shall not include that Registered Entity in the Guided Self-Certification without first discussing the possible inclusion with the Lead Regional Entity (LRE).

3.3 Forms, Instructions, and CDAA

3.3.1 NPCC shall make all relevant forms, instructions, and other documents that are intended to be used by the Registered Entity to complete the Guided Self-Certification available to the Registered Entity. Such forms are provided via email when the Notice of Guided Self-Certification is provided.

3.3.2 NPCC shall utilize the applicable Reliability Standard Audit Worksheet (RSAW) to ensure that the content and general structure of Guided Self-Certification forms conform to the NERC Reliability Standard(s) and include the following:
• Registered Entity contact,
• Confidentiality statement,
• An area for the Registered Entity to provide whether it is compliant, not compliant, or not applicable statement,
• Additional supporting data as directed.

3.3.3 NPCC shall ensure that the CDAA homepage is current with the latest Guided Self-Certification information.

3.4 Notification of Guided Self-Certification to Registered Entity

3.4.1 NPCC shall issue a Notice of Guided Self-Certification to each Registered Entity subject to a Guided Self-Certification.

3.4.2 The notification shall identify whether the Guided Self-Certification applies to the entire Reliability Standard or whether it applies to specific requirements and/or sub-requirements.

3.4.3 The notification shall provide a specific amount of time to respond to the Notice of Guided Self-Certification, which shall be no less than 45 days.

3.4.4 This notification shall include guidance on the evidence required to support a showing of compliance with the Reliability Standard and/or requirement.

3.4.5 The notification shall provide guidance regarding how the Registered Entity should conduct its evidentiary review during the development of their response to the Guided Self-Certification.

3.4.6 The notification shall require the Registered Entity to provide the Guided Self-Certification, including all supporting evidence into CDAA.

3.4.7 The notification shall require the Registered Entity to approve and electronically sign the compliance certification statement form in CDAA.

3.5 Review of Evidence Provided

3.5.1 NPCC shall review the evidence provided by the Registered Entity to determine compliance, non-compliance, or non-applicability with the Reliability Standard and/or requirements subject to the Guided Self-Certification.

3.5.2 The Registered Entity shall provide evidence that is clearly annotated and all appropriate sections of procedures and/or documents highlighted. For a non-applicable requirement, the Registered Entity shall provide justification describing why the requirement is not applicable to them as well as provide any documentation, i.e. procedure or agreement, supporting their not applicable certification.

3.5.3 NPCC may require the Registered Entity to provide additional evidence to complete its review.
3.5.4 NPCC may also schedule a random Spot Check or include the applicable Reliability Standard and/or requirement in a subsequent Audit if the facts and circumstances warrant such a Spot Check or inclusion in an Audit.

3.5.5 If NPCC discovers a potential non-compliance as a result of the Guided Self-Certification, NPCC shall inform the Enforcement department of such potential non-compliance for enforcement processing.

3.6 Guided Self-Certification Results

3.6.1 NPCC shall issue a Guided Self-Certification summary letter or report to the Registered Entity.

3.6.2 The Guided Self-Certification summary letter or report shall identify whether any potential non-compliances were identified by NPCC as a result of its review of the Guided Self-Certification and the supporting evidence provided by the Registered Entity.

4.0 Self-Reporting Process

4.1 NPCC Compliance Staff will post and ensure Self-Report forms are maintained and available via CDAA to all Registered Entities.

4.2 Upon the submission of a Self-Report by a Registered Entity, NPCC Compliance Staff automatically receives an e-mail notification that a Self-Report was submitted into CDAA.

4.3 If the CDAA is not available for submittal of a Self-Report, the Registered Entity must contact NPCC Compliance Staff via e-mail at compliance-submittals@npcc.org to coordinate the completion of the submittal.

4.4 NPCC Compliance Staff will conduct an assessment of each Self-Report submitted by the Registered Entity. NPCC Compliance Staff will contact the Registered Entity as needed to obtain the following information:

4.4.1 Registered Entity Contact

4.4.2 A brief description of the potential non-compliance

4.4.3 Applicable Reliability Standard and requirement

4.4.4 The Registered Entity’s evaluation of the degree of risk/threat to the Bulk Electric System

4.4.5 Status of mitigating activity or mitigation plan

4.4.6 Immediate/remedial actions already taken by the Registered Entity

4.4.7 Any other relevant information
4.5 NPCC Compliance Staff will submit all information regarding the potential non-compliance to NERC and the Registered Entity in accordance with the NERC CMEP and NPCC internal guidelines.

4.6 NPCC Compliance Staff will retain all Self-Reports and supporting material in accordance with NERC requirements.

4.7 NPCC will also support the self-logging program as described in the most recent NERC Self-Logging Program Document.

5.0 References

5.1 North American Electric Reliability Corporation Compliance Monitoring and Enforcement Program, Appendix 4C to the NERC Rules of Procedure

5.2 NPCC Compliance Procedure CP-01, NPCC Implementation of the NERC Compliance Monitoring and Enforcement Program (CMEP)

5.3 CMEP Data Acquisition Application (CDAA)

6.0 Document Revision History

<table>
<thead>
<tr>
<th>Revision</th>
<th>Reason for Change</th>
<th>Reviewed by</th>
<th>Date of CC Approval</th>
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<tbody>
<tr>
<td>0</td>
<td>Original issue</td>
<td>D. Kidney</td>
<td>10/23/08</td>
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<tr>
<td>1</td>
<td>Changed title of Process Owner to AVP of Compliance Audits and Investigation; changed Manager, Compliance Program Implementation to NPCC Compliance Staff; Several grammatical corrections.</td>
<td>D. Cerasoli</td>
<td>12/12/11</td>
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<tr>
<td>2</td>
<td>Removed Section 4.5, which covered the locking out of self-certification forms; Updated Section 4.6 to reflect the new electronic signature process that was implemented during the December 2012 CDAA upgrade; Revised Introduction – Section 1; Entire document reformatted.</td>
<td>D. Cerasoli, S. Nied</td>
<td>3/19/14</td>
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<tr>
<td>3</td>
<td>Replace Self-Certification process with the Guided Self-Certification process.</td>
<td>John Muir</td>
<td>12/3/15</td>
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<tr>
<td>4</td>
<td>Quality control changes made to the Guided Self-Certification section of the procedure to match procedure with practice.</td>
<td>Jacqueline Jimenez</td>
<td>8/16/17</td>
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<tr>
<td></td>
<td>Incorpoated suggestions from the Compliance Committee self-assessment of the Guided Self-Certification process.</td>
<td>Jacqueline Jimenez</td>
<td>3/22/18</td>
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<td>6</td>
<td>Correct wording of Section 3.3.2. to note use of RSAWs in developing forms; Updated Section 3.5.2 to include direction for non-applicable requirements.</td>
<td>Jacqueline Jimenez</td>
<td>9/26/2018</td>
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