
NPCC will begin conducting guided Self-Certifications in lieu of traditional Self-Certifications in the 3rd Quarter of 2015. Guided Self-Certifications focus on risk and add the necessary rigor that will provide NPCC with reasonable assurance of compliance with a Reliability Standard and requirement(s) in scope for the guided Self-Certification. This process change is consistent with NPCC’s commitment to risk-based compliance monitoring and improved compliance assurance.

Prior to 2015, Registered Entities were required to complete Self-Certifications for a broad list of Reliability Standards. This past practice was not risk based and had other limitations. NPCC will not require traditional Self-Certifications for the 2015 calendar year.

Selection of Reliability Standards and Registered Entities

NPCC will select one or more Reliability Standards for a guided Self-Certification each quarter, beginning in the 3rd quarter of 2015. NPCC will use the Areas of Focus and the Risk Elements identified in the annual CMEP Implementation Plan and the Regional Risk Focus Areas identified in the NPCC Appendix to the annual CMEP Implementation Plan as the initial basis for selecting the Reliability Standards and requirements that will be subject to a guided Self-Certification.

NPCC will use the results of the Inherent Risk Assessment (IRA) and voluntary Internal Control Evaluation (ICE) performed by the NPCC Entity Risk Assessment group to assist in the determination of which registered entities will be subject to the guided Self-Certification(s) for each quarter. In some cases, a guided Self-Certification may be used in lieu of an Audit or Spot Check. Guided Self-Certification scopes and monitoring periods will be designed, in most cases, to avoid duplication with Audits, Spot Checks and existing open enforcement action items.

Self-Certification Process

NPCC will issue a notice of guided Self-Certification to each registered entity subject to a guided Self-Certification. The notification will describe the scope of the review, including whether the guided Self-Certification applies to the entire standard, each requirement, or each sub-requirement. It will also provide guidance regarding how the review should be performed and instructions regarding the evidence required to support conclusions of compliance with the Reliability Standard.

Registered entities will have 45 days to respond to the notice of guided Self-Certification.

NPCC will review the guided Self-Certification response, including a concluding statement where the Entity states the result of the self-certification process and the evidence provided by the registered entity to determine compliance or non-compliance with the Reliability Standard(s). If necessary, NPCC may require the registered entity to provide additional evidence. If, NPCC discovers a potential non-compliance as a result of the guided Self-Certification, the potential
non-compliance will be processed by NPCC Enforcement. If the facts and circumstances warrant, NPCC may include the Reliability Standard requirements in scope for a subsequent Spot Check or Audit.

Upon completion of its review of the guided Self-Certification, NPCC will issue a guided Self-Certification report to the registered entity, which will identify whether any potential non-compliances were identified by NPCC as a result of its review of the guided Self-Certification.

NPCC staff will monitor feedback from Registered Entities on the guided Self-Certification process, and over time will make adjustments to continuously improve the process and ensure consistency with NERC and the other Regions.