



Northeast Power Coordinating Council, Inc.
Compliance Monitoring and Enforcement Program

Procedure for NPCC Registration and Certification

CP-04

Rev. 8

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

Process Owner: A.V.P, Compliance

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Review and Re-Approval Requirements

This document is reviewed every two years from its effective date, or as appropriate to incorporate NERC procedural changes, for possible revision. The existing or revised document is 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. **Introduction**

The North American Electric Reliability Corporation (NERC) has delegated the implementation and responsibility of registering Entities that are responsible for compliance with its Reliability Standards, to the Northeast Power Coordinating Council, Inc. (NPCC) within the Northeast sector of North America.

NERC has also delegated to NPCC the responsibility of performing Certification of an Entity's capability to perform the tasks of the certifiable function, i.e., Reliability Coordinator (RC), Balancing Authority (BA), and/or Transmission Operator (TOP), for which it has applied or has been registered.

These responsibilities have been delegated to NPCC by NERC to ensure the following:

- i. That all Entities within the NPCC footprint have been properly registered for the functions needed to implement the NERC Reliability Standards
- ii. That the new Entity (i.e., applicant to be an RC, BA, and/or TOP that is not already performing the function) has the tools, processes, training, and procedures to demonstrate its ability to meet the Requirements/sub-Requirements of all of the Reliability Standards applicable to the function(s) for which it is applying, and thereby demonstrating the ability to become certified and then operational.

This procedure includes the Registration Process for Individual Registration, Joint Registration Organization (JRO), and Coordinated Functional Registration (CFR). Organizations listed on the Compliance Registry will be responsible for knowing the content of and complying with the NERC and NPCC Reliability Standards.

The Compliance Registry is dynamic and will be revised as necessary to take into account changing circumstances. NPCC will take such recommendations, and other applicable information, under advisement as it determines whether an Entity can change and / or be on the Compliance Registry.

This procedure also includes the Certification Process for certifying new RC, BA, and/or TOP. Organizations seeking to be an RC, BA, and/or TOP within the NPCC footprint will be responsible for notifying NPCC. In addition, certain changes to an already operating and certified RC, BA, and/or TOP require a review by NPCC and NERC. These RCs, BAs, and/or TOPs will be responsible for notifying NPCC when becoming aware of any changes that could affect the ability in performing the RC, BA, and/or TOP function.

Each Registered Entity identified on the NERC Compliance Registry (NCR) shall notify its corresponding Regional Entity(s) of any corrections, revisions, deletions, changes in ownership, corporate structure, or similar matters that affect the Registered Entity's responsibilities with respect to the Reliability Standards. Failure to notify will not relieve the Registered Entity from any responsibility to comply with the Reliability Standards or shield it from any Penalties or sanctions associated with failing to comply with the Reliability Standards applicable to its associated Registration.

The terminology used herein is as defined by the NERC Rules of Procedure, NERC Statement of Compliance Registry Criteria, NERC Glossary of Terms, and NPCC Glossary.

2. Registration Scope

NPCC shall register all Entities within the Region's footprint in accordance with the NERC Rules of Procedure Section 500 and Appendix 5A, and the current NERC Statement of Compliance Registry Criteria Document.

All Entities performing functions as defined in the NERC Statement of Compliance Registry Criteria are required to register using forms and processes described on the NPCC website (www.npcc.org). Bulk Power System Owners, Operators, and Users are responsible to provide the necessary and required information requested in the Centralized Organization Registration ERO System (CORES) to complete their registration.

The NPCC Registration Process is one of NPCC's critical components for its enforcement of the NERC Compliance Monitoring and Enforcement Program (CMEP). NPCC continuously monitors the Registered Entities and works closely with the Reliability Coordinators (RCs) and others in the NPCC footprint to ensure that the Registry is complete. The Registered Entities are also responsible to notify NPCC of any changes in their functional responsibilities as they are recognized in their organization. The Registered Entities shall notify NPCC as soon as these changes are identified.

In meeting its delegated responsibilities, NPCC must also closely monitor the NERC Statement of Compliance Registry Criteria and the NERC Rules of Procedure, Section 500 for any revisions to these documents that could affect the registry.

NERC shall establish and maintain the Official Compliance Registry of Bulk Power System Owners, Operators, and Users that are subject to compliance with the approved Reliability Standards.

In addition to CORES, NPCC also maintains within the NPCC Compliance Data Administration Application (CDAA) database the current Registered Entities and their assigned function(s) to meet the obligations of the NERC CMEP. The CDAA database also contains the Registered Entities contact information.

3. Registration Responsibilities

The Assistant Vice President - Compliance, or his/her designee, is responsible for:

- Reviewing all Entity requests for Registration Changes that are submitted to NPCC;
- Developing and maintaining a list of Registered Entities for the Region and providing periodic updates to NERC based on changes to the list;
- Identifying errors and omissions in the Registry and making corrections as necessary;
- Ensuring that NERC is updated with all Registration Requirement Changes;
- Working closely with all Entities regarding the NPCC and NERC Registration Process;
- Ensuring that all functional entities have been reviewed to ensure agreements are in place or if an Entity is not to be registered that there is justification documented;
- Verifying satisfaction of exclusion criteria per NERC Statement of Compliance Registry for functional areas such as DPs and DP-UFs;
- Periodically sending out registration surveys or questionnaires to the Registered Entities to identify any changes with assets or functional areas;

- Informing Registered Entities of any changes to the Registration Criteria or other changes that might impact Entities; and,
- Performing periodic updates to the Registered Entities' database according to changes to the NERC Statement of Compliance Registry Criteria and the NERC Rules of Procedure, Section 500 and communicating these changes to the affected Registered Entities.

4. Registration Process

The Assistant Vice President - Compliance, or his/her designee, develops and maintains an up-to-date listing of Registered Entities within the NPCC region, consistent with the guidance set forth in the NERC Statement of Compliance Registry Criteria, as amended from time to time. At a minimum, the listing will include:

- Legal Entity name;
- All NERC defined Reliability Compliance functions the Entity performs;
- Primary Compliance Contact (name and contact information);
- Primary Compliance Officer (name and contact information);
- Date of Last Registration update for the Entity; and,
- Cross-references for any Compliance responsibility that the Entity has delegated to or has assumed from another Entity through a signed contractual agreement.

Note:

The Registered Entity is responsible for providing the above information to NPCC upon request, and is also responsible for the accuracy of the information provided.

NPCC verifies satisfaction of exclusion criteria per NERC Statement of Compliance Registry for functional areas.

The Assistant Vice President - Compliance, or his/her designee, reviews Registration documents that are submitted to NPCC.

The Assistant Vice President - Compliance, or his/her designee, will review the application and determine if the Entity is within NPCC footprint or if it spans more than one Region. For Applicants that span multiple Regional Entities and wish to consolidate their registrations in one Region, NPCC will work with the other applicable Regional Entities and NERC to ensure that the Registration is properly consolidated as per the current ERO Compliance Oversight Procedures for Multi-Regional Registered Entities (MRRE).

NPCC is responsible for following the Registration Process and verifying the Entity is properly registered in accordance with the current versions of the NERC Rules of Procedure (Section 500 – Organization Registration and Certification) and Appendix 5B to the NERC Rules of Procedure (Statement of Compliance Registry Criteria). This verification shall include:

- Ensuring that all geographical or electrical areas of the Bulk Power System are under the oversight of one and only one Reliability Coordinator;
- Ensuring that all Balancing Authorities and Transmission Operator entities are under the responsibility of one and only one Reliability Coordinator;

- Ensuring that all transmission facilities of the Bulk Power System are the responsibility and under the control of one and only one Transmission Planner, Planning Authority, and Transmission Operator; and,
- Ensuring that all loads and generators are under the responsibility and control of one and only one Balancing Authority.

The Assistant Vice President - Compliance, or his/her designee, ensures that the official copy of the NPCC Compliance Registry is maintained. This registry shall also be updated and posted monthly on the NPCC compliance website.

The Assistant Vice President - Compliance, or his/her designee, shall perform the following:

- Evaluate requested Registration changes made by Entities and revise the NPCC Compliance Registry accordingly. If the requested change cannot be accommodated, the Entity will be notified of the reason / rationale for maintaining the existing Registration as is;
- Notify NERC promptly of any changes to the NPCC Compliance Registry; and,
- Provide input to the annual Compliance and Audit Plans based on the NPCC Compliance Registry.

An entity may challenge a Registration decision made by NPCC:

- NPCC will provide the entity with an opportunity to notify NPCC via email of the registration challenge and provide proper documentation.
- NPCC will perform a review and provide a response to an entity registration challenge within 30 days of receipt.
- If the entity is not satisfied with the NPCC decision, all further actions associated with the challenge will be handled in accordance with Appendix 5A of the NERC ROP.

The Assistant Vice President - Compliance, or his/her designee, will perform the following if an Organization takes steps to register as a Joint Registration Organization (JRO):

- Review the application of the Entities participating in a JRO. The Assistant Vice President Compliance or his/her designee, also verifies that the agreement between the JRO and its members provides for an allocation or assignment of responsibilities consistent with the JRO registration. Any entity seeking to register as a JRO must submit a written agreement with its members or related entities for all requirements/sub-requirements for the function(s) for which the Entity is registering for and takes responsibility for, which would otherwise be the responsibility of one or more of its members or related entities. A form for documenting the accountability of the JRO responsibilities, Registration is available on the NPCC website.
- Notify NERC of each JRO that the NPCC accepts. The notification will identify the point of contact and the functions(s) being registered for on behalf of its members or related entities.

- Keep a list of all JROs. This document shall contain a list of each JRO's members or related entities and the function(s) for which the JRO is registered for that member(s) or related Entity(s). It is the responsibility of the JRO to provide the Regional Entity with this information as well as the applicable JRO agreement(s).
- NPCC shall confirm that the Joint Registration will result in:
 - There are no areas lacking in the performance of the duties and tasks identified and required by the applicable Reliability Standards; and,
 - There are no unnecessary duplications of such coverage of areas by Entities to perform the duties and tasks identified in and required by the Reliability Standards or of required oversight of such coverage.
- NPCC may request clarification of any list submitted to it that identifies the Compliance responsibilities of the JRO and its member(s) or related Entity(s).
- NPCC will notify NERC that the JRO has been accepted in accordance with the Registration Procedure.
- In accordance with the NERC Rules of Procedure, any JRO registered with NPCC will be required to provide an annual update of its Membership and Division of Responsibilities (i.e., matrix of accountability by requirement).

The Assistant Vice President - Compliance, or his/her designee, shall perform the following steps for entities engaged in a Coordinated Functional Registration (CFR):

- Review the application of the Entities participating in a CFR and verifies that the agreement between the CFR and its members provides for an allocation or assignment of responsibilities consistent with the CFR registration. The CFR submission must include a written agreement that governs itself and clearly specifies the entities' respective compliance responsibilities. Additionally, each Entity shall take full compliance responsibility for those standards and/or requirements/sub-requirements it has registered for in the CFR. A form for documenting the accountability of the CFR responsibilities is available on the NPCC website.
- Notify NERC of each CFR that NPCC accepts. The notification will identify a point of contact that is responsible for providing information and data, including submitting reports as needed by NPCC related to the CFR registration.
- NPCC may request clarification of any list submitted to it that identifies the compliance responsibilities of the CFR and may request such additional information as NPCC deems appropriate.
- Submit to NERC, for posting on its website, the matrix of reliability standards applicable to Registered Entities based on the functions the Entity performs.
- NPCC shall confirm that the Coordinated Functional Registration will result in:

- There are no areas lacking in the performance of the duties and tasks identified and required by the applicable Reliability Standards; and,
- *There are no unnecessary duplications of such coverage of areas by Entities to perform the duties and tasks identified in and required by the Reliability Standards or of required oversight of such coverage*

The Assistant Vice President - Compliance, or his/her designee, will be the point of contact for all Entity Registration Appeals that are allowed by the NERC Rules of Procedure.

5. Certification Scope

NPCC shall perform Organization Certification in accordance with NERC Rules of Procedure Section 500 and Appendix 5A.

NPCC, through the Organization Certification Process, shall ensure a new Entity (i.e., applicant to be an RC, BA, or TOP that is not already performing the function) has the tools, processes, training, and procedures to demonstrate their ability to meet the Requirements/sub-Requirements of all of the Reliability Standards applicable to the function(s) for which it is applying and thereby demonstrating the ability to become certified and then operational.

6. Certification Responsibilities

The Assistant Vice President - Compliance, or his/her designee:

- Is responsible for overall execution of the Certification Process
- Acts upon the Certification Team (CT) recommendation for Certification
- Notifies the Entity and NERC of the Certification decision.

The Manager (or Designee) responsible for Certification:

- Ensures Regional execution of the ERO Certification process.
- Identifies Certification Team Leader (CTL) and determines members of the CT in coordination with the CTL, confirms completion of required training, and execution of appropriate CT member documentation.
- Approves and ensures the adequate implementation of subsequent action plans from completed ERO Certifications.
- Responsible for facilitating final RE approval of Entity Certification.

7. Certification Process

NPCC shall perform Organization Certification in accordance with NERC Rules of Procedure Section 500, Appendix 5A, and its associated "ERO Certification and Review Process Manual".

Certain changes to an already operating and certified RC, BA, or TOP require a review by NPCC and NERC. The decision to continue certification following certain changes to an already operating and certified RC, BA, or TOP is a collaborative decision between NPCC, the affected Regional Entity (ies), and NERC. NERC has the final authority regarding this decision. Changes that are to be considered in this decision include one or more of the following:

- Changes to a Registered Entity's Footprint or operational challenges (i.e., TLRs) due to the changes.
- Organizational restructuring that could impact the Bulk Power System reliability.

- Relocation of the control center.
- Changes to Registered Entity ownership requiring major operating procedure changes.
- Significant changes to JRO / CFR assignments or agreements changes.
- Addition or removal of member JRO / CFR utilities or Entities.
- Complete replacement of a SCADA/EMS system.

8. Certification Process Procedures

NPCC shall follow NERC Rules of Procedure Appendix 5A. NPCC shall annually remind all Registered RC, BA and TOP within the NPCC footprint that they are required to notify NPCC when those Entities experience any of the changes listed in section 7.

The Certification Process shall be completed within nine months of the date of acceptance of a certification application unless (1) agreed to by all parties involved in the process and (2) approved by NERC.

NPCC will send a questionnaire with a submission deadline and a statement of expectations to all Entities participating in the Certification process. NPCC will distribute questionnaires and other related documents to the following Entities: (1) Entity seeking Certification; (2) participating BAs, RCs, and TOPs in Footprints in which the Entity intends to operate or with which the Entity intends to interconnect transmission facilities; (3) Participating TOs, TSPs, PAs, GOs, IAs, GOPs, TPs, DPs, and/or other applicable Entities.

NPCC shall notify NERC that the Certification Process has begun to enable NERC to carry out its roles and responsibilities

After an Entity has been awarded Certification, NPCC shall notify all applicable Entities as to the date that the newly certified Entity may begin its operation.

The RC, BA, and/or TOP Re-Certification will follow the same processes and procedures described herein for new certifications, with an appropriately scoped evaluation effort, including team composition, onsite visit needs and change in terminology as appropriate.

9. Records

All materials created or used by NPCC personnel while performing Registration and Certification processes which contain information of value for any period of time, including but not limited to: documents, papers, maps, photographs, tapes, correspondence, memoranda, drafts, electronic mail, and electronic files documents, data, information, and or records shall be maintained and disposed of in accordance with the NERC Rules of Procedure as per Sections 501, 502, and 1500.

The Retention Period for Registration and Certification materials is six (6) years as specified in the NERC Rules of Procedure.

10. References

- North American Electric Reliability Corporation Compliance Monitoring and Enforcement Program - Appendix 4C to the Rules of Procedure
- NERC Organization Registration and Certification – NERC Rules of Procedure Section 500 and Appendix 5A to the NERC Rules of Procedure.
- ERO Certification and Review Process Manual.
- Statement of Compliance Registry Criteria – Appendix 5B to the NERC Rules of Procedure.
- NPCC CP-01, Implementation of the NPCC Compliance Monitoring and Enforcement Program.
- NPCC A-10 Document, “Classification of Bulk Power System Elements”.
- NERC Program Implementation Bulletin #2009-PIB-002 / 2.0.

Version History

Version	Date	Changes Made/Comments	Reviewed By	Date Approved by Compliance Committee
0	6/21/2007	This is a new document put in place for the NPCC Registration process.	T. Kirkpatrick	7/2008
1	7/8/2009	This revision incorporates the Joint Registration Organization (JRO) process. This revision also adds additional steps on the screening of Entities by NPCC prior to adding a New Registered Entities or changing the Registration for an Entity. Steps were added to ensure that the functional Entities have the proper relationships in a Reliability Coordinators area. Added additional steps for management reviews and responsibilities for the appeals process. Added references. Formatted and edited document.	Trey Kirkpatrick	10/15/09
2	11/17/2011	Revised JRO registration section to reflect NERC Rules of Procedure. Added a new section on CFR registration as outline in the NERC Rules of Procedure. Updated references. Formatted and editorial changes throughout the document.	Duong Le	December 12, 2011
3	3/21/2013	Added Certification Process section per CC suggestions as a result CC assessment of NPCC Registration Process on July 25-26, 2012. Formatted and editorial changes throughout the document.	Duong Le	April 17, 2013
4	3/6/15	Minor edit in Section 4.3 and general review of document. Moved data maintenance into new Section 8.	Scott Nied	March 17, 2015
5	9/10/15	Added text in Sec 4.7 to address challenges; clarified data retention text in Section 8.	Scott Nied	September 22, 2015
6	2/10/17	Updated Section 4.4 to align document to current version of NERC Rules of Procedure; Updated Section 4.7 to reduce NPCC review time to 30 days; Updated and corrected titles and group names throughout document.	Stanley Kopman	February 15, 2017
7	12/7/17	Changed AVP title name. cursory review.	Scott Nied	December 7, 2017
7	11/14/19	Rev 7 was reviewed. No updates necessary at this time.	Scott Nied	NA
8	6/5/20	Minor changes to reflect CORES.	Kimberly Griffith	June 17, 2020