



NORTHEAST POWER COORDINATING COUNCIL, INC.
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Procedure for Self-Certification and Self-Reporting

CP - 06

Rev. 7

*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

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Table of Contents

1.0 INTRODUCTION AND PURPOSE 3

2.0 COMPLIANCE STAFF RESPONSIBILITIES 3

3.0 SELF-CERTIFICATION PROCESS 4

4.0 SELF-REPORTING PROCESS 6

5.0 REFERENCES 7

6.0 DOCUMENT REVISION HISTORY 7

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 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.
- 1.4 Self Certification in Canadian jurisdictions will be conducted under the respective Provincial regulatory structures.

2.0 Compliance Staff Responsibilities

- 2.1 Identifying one or more Reliability Standards for a Self-Certification each quarter, or on a schedule otherwise determined to be appropriate.
- 2.2 Developing and maintaining new or revised Self-Certification forms in the CMEP Data Acquisition and Administration (CDAA) portal.
- 2.3 Developing the process for submitting the Self-Certification forms and applicable evidence.
- 2.4 Providing the Self-Certification instructions and schedules to the Registered Entities.
- 2.5 Reviewing submitted Self-Certification forms and applicable evidence to ensure that applicable Registered Entities have met the requirements.
- 2.6 Ensuring that each affected Registered Entity has submitted the appropriate Self-Certification forms and applicable evidence, including the signed certification statement.
- 2.7 Ensuring that CDAA functions properly to provide and accept Self-Certification forms with applicable evidence and Self-Report forms.

- 2.8 Ensuring that appropriate communications have been distributed to the Registered Entities for all CDAA enhancements.

3.0 Self-Certification Process

3.1 Selection of Reliability Standard for Self-Certification

- 3.1.1 NPCC may select one or more Reliability Standards for a 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 Self-Certification.

3.2 Selection of Entities subject to the 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 Self-Certification(s) for each quarter. NPCC may also receive input from Enforcement trends, audit teams, and/or NERC.
- 3.2.2 A Self-Certification or a series or group of 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 Self-Certification and the scope of such an Audit or Spot Check includes the Reliability Standard and requirements subject to the Self-Certification, NPCC shall not include that Registered Entity in the 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 Self-Certification, NPCC shall not include that Registered Entity in the 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 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 Self-Certification available to the Registered Entity. Such forms are provided via email when the Notice of Self-Certification is provided.

- 3.3.2 For Self-Certifications with evidence submittal, NPCC shall utilize the applicable Reliability Standard Audit Worksheet (RSAW) to ensure that the content and general structure of 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 Self-Certification information.
- 3.4 Notification of Self-Certification to Registered Entity
- 3.4.1 NPCC shall issue a Notice of Self-Certification to each Registered Entity subject to a Self-Certification.
- 3.4.2 The notification shall identify whether or not the Self-Certification requires an evidence submittal.
- 3.4.3 The notification shall identify whether the Self-Certification applies to the entire Reliability Standard or whether it applies to specific requirements and/or sub-requirements.
- 3.4.4 The notification shall provide a specific amount of time to respond to the Notice of Self-Certification, which shall be no less than 45 days.
- 3.4.5 The notification shall include guidance on the evidence required to support a showing of compliance with the Reliability Standard and/or requirement.
- 3.4.6 The notification shall provide guidance regarding how the Registered Entity should conduct its evidentiary review during the development of their response to the Self-Certification.
- 3.4.7 The notification shall require the Registered Entity to provide the Self-Certification, including any applicable supporting evidence into CDAA.
- 3.4.8 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 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 Self-Certification, NPCC shall inform the Enforcement department of such potential non-compliance for enforcement processing.
- 3.6 Self-Certification Results
- 3.6.1 NPCC shall issue a summary letter or report to the Registered Entity for Self-Certifications that require evidence.
 - 3.6.2 The 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 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

Revision	Reason for Change	Reviewed by	Date of CC Approval
0	Original issue	D. Kidney	10/23/2008
1	Changed title of Process Owner to AVP of Compliance Audits and Investigation; changed Manager, Compliance Program Implementation to NPCC Compliance Staff; Several grammatical corrections.	D. Cerasoli	12/12/2011
2	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 –	D. Cerasoli, S. Nied	03/19/2014

	Section 1; Entire document reformatted.		
3	Replace Self-Certification process with the Guided Self-Certification process.	John Muir	12/03/2015
4	Quality control changes made to the Guided Self-Certification section of the procedure to match procedure with practice.	Jacqueline Jimenez	08/16/2017
5	Incorporated suggestions from the Compliance Committee self-assessment of the Guided Self-Certification process.	Jacqueline Jimenez	03/22/2018
6	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.	Jacqueline Jimenez	09/26/2018
7	Replace Guided Self-Certification process with Self-Certification process; Quality control changes made to the Self-Certification section of the procedure to match procedure with practice.	Jacqueline Jimenez	