



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

NERC GUIDANCE ON SELF-REPORTS

NERC Version No.: Version 1.1

DATE: October 17, 2012

A. Nature of the Potential Noncompliance

1. Provide a detailed description of what happened, why it happened, when it happened, where it happened and how it happened. This should include, but is not limited to, identification of the nature and number of total employees, devices, intervals, etc., and relevant portion thereof, at issue in the potential noncompliance.
2. Identify the duration of the potential noncompliance, including start and end dates.
3. Identify the Reliability Standard requirements at issue.
4. Identify the time horizon of the potential noncompliance. Did the potential noncompliance impair or threaten real-time operations or day-ahead operations planning?
5. Was the potential noncompliance related to documentation, performance or both? Explain.

B. Discovery

6. Explain how the potential noncompliance was discovered.

7. Identify who discovered it and when.

8. Was it discovered through self-evaluation, internal audit, or internal compliance program?
Was it discovered as a result of an investigation or in preparation for, or during an audit?
Was it self-revealing through an event or other operational occurrence?

9. What time period elapsed between discovery and reporting of the potential noncompliance to the Compliance Enforcement Authority? If there is a gap, please explain.

C. Scope (Extent of Condition)

1. Did similar conditions or similar events occur at any of the Registered Entity's other facilities or those of its affiliates?

2. Is this a repeat potential violation or repeat Remediated Issue?

D. Cause

1. With respect to the cause of the potential violation, were there extenuating circumstances?

2. Was it the result of intentional, negligent or inadvertent behavior or action?

3. Was the Registered Entity attempting to comply in good faith?

E. Mitigation

1. What are the mitigation activities that have been taken or will be taken to correct the potential noncompliance?

2. What is the status of mitigation activities?

3. What is the timeline for completion of mitigation activities, including any milestones?

4. What actions are being undertaken to prevent recurrence? Identify changes to policies, procedures, or systems. Identify training that has been or will be done.

5. What is the timeline for completion of actions to prevent recurrence?

6. Describe above and beyond actions that have been or will be done and timing of completion.

F. Risk

1. What is the potential risk to the reliability of the bulk power system due to the potential noncompliance?

2. What is the actual risk to the reliability of the bulk power system due to the potential noncompliance?

3. What is the actual harm to the reliability of the bulk power system due to the potential noncompliance?

4. What factors mitigated the risk to reliability, including but not limited to internal controls, alarms, monitoring activities, other compliance activities or any others?

5. What is the likelihood of the conduct recurring?

6. If applicable, what were the system conditions during the event? For example, did the potential violation take place while the system was stressed, e.g., during an Energy Emergency or when other emergency or special operating procedures were in effect?

7. What are the size, nature, and location of the facilities at issue?

8. Were there any misoperations, system operating limits, or interconnection reliability operating limits during the course of the potential noncompliance?

G. Personnel Involved

1. Did the Registered Entity's disclosure include the identity of employees involved, including senior management?
2. What was the role of senior management with respect to the potential noncompliance?
3. Did senior management actively participate and encourage employees to provide complete information?

H. Internal Compliance Program (ICP)

1. Describe the internal compliance program, including documentation, implementation, training and review schedule.
2. When was it established?
3. What improvements have been implemented as a result of the potential noncompliance?
4. If the ICP was in place at the time of the potential noncompliance, explain whether the ICP could have prevented the potential noncompliance.

I. Other

1. Provide or list all relevant documents and evidence in support of the Self-Report and issues discussed above.

NERC Guidance on Self-Reports

REVISION HISTORY		
NERC Version No.	Revision(s)	Date
Version 1.0		October 15, 2011
Version 1.1	Added NERC logo and headers; added Revision History	October 23, 2012