ERO Enterprise Guide for the Multi-Region Registered Entity Coordinated Oversight Program

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RELIABILITY | ACCOUNTABILITY

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Preface

The vision for the Electric Reliability Organization (ERO) Enterprise, which is comprised of the North American Electric Reliability Corporation (NERC) and the seven Regional Entities (REs), is a highly reliable and secure North American bulk power system (BPS). Our mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid.

The North American BPS is divided into seven RE boundaries as shown in the map and corresponding table below. The multicolored area denotes overlap as some load-serving entities participate in one Region while associated Transmission Owners/Operators participate in another.
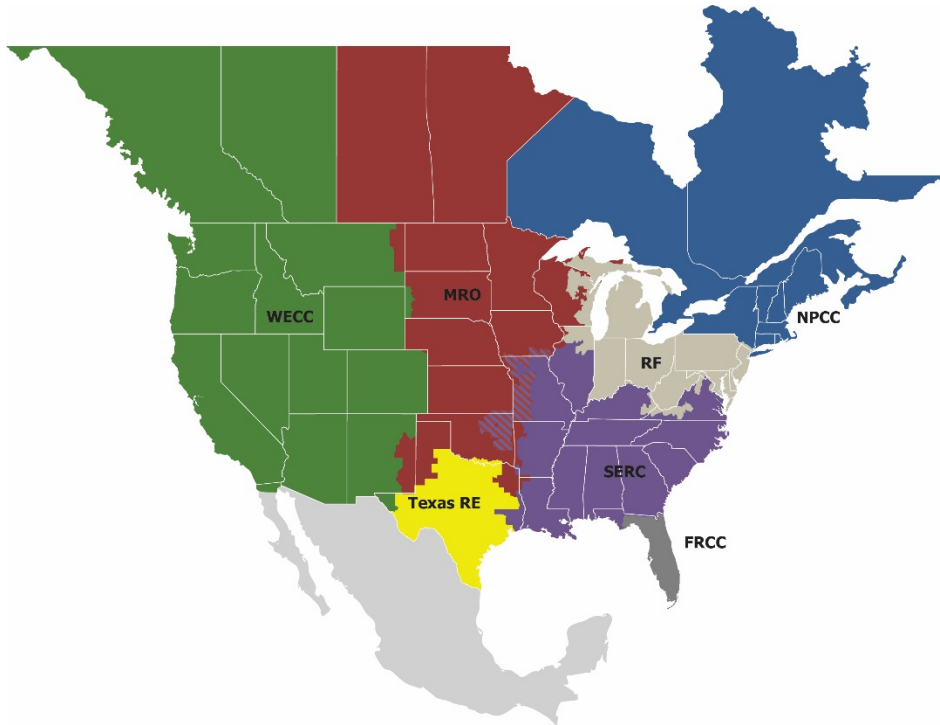
FRCC	Florida Reliability Coordinating Council
MRO	Midwest Reliability Organization
NPCC	Northeast Power Coordinating Council
RF	ReliabilityFirst
SERC	SERC Reliability Corporation
Texas RE	Texas Reliability Entity
WECC	Western Electricity Coordinating Council

Purpose

The ERO Enterprise, consisting of NERC and the eight REs, developed the Multi-Region Registered Entity (MRRE) Coordinated Oversight Program (Program) to increase efficiencies in resource allocation for registered entities while maintaining the reliability of the BPS. Specifically, the Program is designed to eliminate unnecessary duplication of compliance monitoring and enforcement activities.

The purpose of this document is to describe the approach used by NERC and the REs for MRREs that have been approved to participate in the Program.[1] Specifically, this guide describes the following:

- general roles and responsibilities of the Lead Regional Entity (LRE) and each Affected Regional Entity (ARE)

- Program application and MRRE group modifications

- for MRREs participating in the Program, expectations for coordination of

    o compliance audits

    o spot checks

    o compliance investigations

    o self-certifications

    o self-reports

    o periodic data submittals

    o complaints processed by the REs for MRREs participating in the Program

    o enforcement activities and updates

    o the review of MRRE responses to

        ▪ system events

        ▪ NERC Alerts

    o education and outreach responsibilities

In addition to this guide, the ERO Enterprise developed and maintains Frequently Asked Questions (FAQs) for the Program. The FAQs contain NERC and RE contact information, as well as additional information around the Program.[2]

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[1] This MRRE Coordinated Oversight guide only applies to activities in the United States; it does not currently apply to activities in Canada or Mexico.

[2] The FAQs are available at: Reliability Assurance Initiative/Coordinated Oversight MRRE FAQ.

Terms and Definitions

1. **Affected Regional Entity (ARE)** – A Regional Entity, other than the Lead Regional Entity, in which the Multi-Region Registered Entity participating in coordinated oversight is registered for various NERC functional responsibilities.

2. **Compliance Monitoring And Enforcement Program (CMEP)** – The program used by the NERC and the Regional Entities to monitor, assess, and enforce compliance with Reliability Standards within the United States. The CMEP is found in Appendix 4C of the NERC Rules of Procedure (ROP).

3. **Compliance Oversight Plan (COP)** – A dynamic plan consisting of the oversight strategy for a registered entity, including the list of Standard Requirements for monitoring, the Compliance Monitoring and Enforcement Program tool(s) to be used, and the anticipated monitoring interval.

4. **Coordinated Oversight** – The agreed upon steps and activities that a Lead Regional Entity and Affected Regional Entity(ies) follow for coordinating activities associated with delegated functions (e.g., compliance and enforcement, system events, etc.) for Multi-Region Registered Entities that have been approved for participation in the Program.

5. **Designated Coordinated Oversight Contacts (DCOC)** – The designated Regional Entity's representatives assigned for coordinated oversight activities. Regional Entities may choose to assign more than one designated contact for the different delegated functional responsibilities covered in the Program.

6. **Lead Regional Entity (LRE)** – The Regional Entity selected by the Electric Reliability Organization (ERO) Enterprise to lead coordinated efforts related to oversight of a Multi-Region Registered Entity participating in the Program. When appropriate, the ERO Enterprise may designate more than one LRE. The designated LRE could be changed, as agreed upon by the ERO Enterprise. In the event of a change, the registered entity will be notified 60 days prior to the effective date of the change.

7. **MRRE Group Name** – A name assigned to the Multi-Region Registered Entity by the NERC Multi-Region Registered Entity Coordinator.

8. **MRRE Group Number** – An identification tracking number assigned by the NERC Multi-Region Registered Entity Coordinator.

9. **Multi-Region Registered Entity (MRRE)** – For the purposes of this guide, a registered entity—or two or more registered entities that are corporate affiliates—performing bulk electric system (BES) functions in two or more Regional Entities that has been approved for coordinated functions and responsibilities by the ERO Enterprise. It is acknowledged there are other registered entities that are corporate affiliates and performing BES functions in two or more Regional Entities that are not included in the Program.

10. **NERC MRRE Coordinator** – An individual assigned by NERC staff to coordinate the NERC MRRE activities.

11. **NERC Rules of Procedure** – The Federal Energy Regulatory Commission (FERC)-approved rules governing NERC and NERC members. The NERC Rules of Procedure requires that NERC and NERC members shall comply with the Rules of Procedure. Each Regional Entity shall comply with the Rules of Procedure as applicable to functions delegated to the Regional Entity by NERC.

12. **Primary Compliance Contact (PCC)** – The Primary Compliance Contact is the point of contact designated by the Multi-Region Registered Entity for all compliance issues such as audits, NERC/Regional Entity communications, etc.

13. **Primary Compliance Officer (PCO) or Authorized Officer (AO)** – The individual within the MRRE who represents the company for ERO Enterprise matters.

Section I: MRRE Coordinated Oversight Roles and Responsibilities

This section covers the general roles and responsibilities of NERC, the LRE, and the ARE(s). Roles and responsibilities related to specific compliance monitoring, enforcement, registration and certification, system events, NERC Alerts, and education and outreach are addressed in the applicable sections in this guide.

Roles and Responsibilities

NERC
NERC maintains oversight responsibility for the MRRE Program.

Lead Regional Entity
The LRE is responsible for the coordination and administration, on behalf of itself and the ARE(s), of the delegated activities for oversight of the MRRE, including the following:

- Incorporating MRRE in LRE's annual Implementation Plan, as appropriate

- Coordinating with the ARE(s) to

    o Set dates for planned oversight activities to allow the ARE(s) to participate in the activities and appropriately plan resources

    o Coordinate with the ARE(s) to develop a COP that will determine the oversight approach for the MRRE, including the timing and frequency of such activities

- Composing reports related to coordinated oversight activities and providing such reports to ARE(s) for review and comment, prior to the issuance of such reports

- Performing Inherent Risk Assessments (IRAs) for MRRE entities with input and participation of the AREs

- Conducting Internal Controls Evaluations (ICEs) for MRRE entities with input and participation of the AREs, as applicable

- Notifying ARE(s) upon identification of any MRRE issues or lessons learned discovered through a self-report, compliance audit, self-certification, periodic data submittal, compliance investigation, complaint, spot check, system event, technical feasibility exception, or NERC alert

- Providing periodic updates to ARE(s) as the issues are processed

Affected Regional Entity
Each ARE is responsible for reviewing information provided by the LRE and providing feedback as needed or requested.

Joint Responsibilities
Confidentiality
NERC and the REs shall ensure the protection of all Confidential Information consistent with Confidentiality Provisions in Section 1500 of the ROP[3]. Section 1506 of the ROP allows NERC and the REs to share with each other the confidential compliance information of registered entities, provided they maintain the confidentiality of the information.

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[3] See NERC Rules of Procedure.

Data Retention and Disposal of Confidential Information

The LRE and ARE(s) are both responsible for the secure transfer and storage of all data and evidence associated with the coordinated functions performed under this guide, including—but not limited to—the data necessary for risk evaluation, ICE, mitigation activities, notices, reports, monitoring and system events. Additionally, the LRE and ARE(s) will be responsible for retention and disposal timing as required by the ROP, regulations, and—as applicable—the LRE and ARE data retention policies, and will coordinate prior to disposal.

LRE and ARE(s) will follow their Regional data retention policy for historical documents collected before the effective date of the coordinated oversight of MRRE.

In the event a registered entity withdraws from, or is no longer participating in, the MRRE Program, the REs where the MRRE is registered will re-assume responsibility for the retention and disposal of any new data from the effective date of the transition for the registered entity(ies). LRE will make confidential data and information available to the ARE(s) upon request. REs maintain documentation retention policies, processes, and procedures LRE and ARE(s) follow for all ROP activities.

Section II: MRRE Coordinated Oversight Application and MRRE Group Modifications

This section provides the criteria for inclusion of registered entity(ies) in the Program, and information on the MRRE coordinated oversight application process, the appointment of an LRE, MRRE group modification, the Program termination process, and the LRE reassignment process.

Criteria for Inclusion of Registered Entity(ies) in the Program

A registered entity operating in or owning assets in two or more REs' jurisdictions with one or more NERC IDs is a potential candidate for inclusion in the Program. Registered entities seeking inclusion in the Coordinated Oversight Program must verify with NERC that their Primary Compliance Contact (PCC), Primary Compliance Officer (PCO), and Authorizing Officer (AO) are accurate prior to submitting a request to be included in the Coordinated Oversight Program. The registered entity(ies) must also designate a single PCC. If accepted in the Program, this MRRE PCC will coordinate the collection of all required documentation and evidence from all of its operating areas and facilities, as requested by NERC and its designated LRE. MRRE participation in Coordinated Oversight may be for compliance with the NERC Critical Infrastructure Protection Standards, Operations and Planning Reliability Standards, or both.

MRRE Coordinated Oversight Application Process

A registered entity's PCC, PCO, or AO must submit to NERC a request to be included in the Program.[4] If the initial request is made to the RE in which the registered entity is registered, then the RE will direct the registered entity to make the request directly to NERC. The request should include the following information:

- Registered Entity Name(s)

- NERC Compliance Registry (NCR) Number(s)

- Applicable Regions (per registered entity)

- Applicable Functions (per registered entity)

- Single PCC information for MRRE

- Description of Facilities and BES Cyber Assets (to assist in application of the Selection Guidelines)

NERC will communicate with the MRRE applicant for any additional information deemed necessary. NERC will compile the information pertinent to the application and seek approval from the ERO Enterprise. The ERO Enterprise will review and discuss all Coordinated Oversight requests and any other related information to determine whether related registered entities may be designated as an MRRE in the Program.

Upon approval, the NERC MRRE Coordinator will notify the LRE and ARE(s). The LRE(s) will then do the following:

- Notify the MRRE of acceptance into the Program

- Ensure the MRRE understands its obligations under the MRRE Program

Lead Regional Entity Assignment

If the ERO Enterprise approves an MRRE for inclusion in the Program, the ERO Enterprise assigns the LRE(s). The ERO Enterprise considers various factors when selecting an LRE, including—but not limited to—the location of assets with high and medium impact on the BES, seams issues, registered functions in each RE, load, generation

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[4] As noted in the Program FAQ document, MRREs should submit their requests to ComplianceOversight@nerc.net.

and transmission assets, control center locations, interties, Protection Systems schemes, Blackstart units, etc. MRREs will not be involved in the LRE selection process.

MRRE Group Modification

If an MRRE seeks to modify or add additional registered entity(ies) to its MRRE group, the LRE will initiate the process by requesting the modified or new registered entity's information, such as NCRs or functions that are applicable. The LRE will notify the NERC MRRE Coordinator, who will do the following:

- Request the MRRE to complete the Coordinated Oversight Asset Verification Sheet and return to the NERC MRRE Coordinator

- Send the MRRE change request along with the completed asset verification spreadsheet to the designated LRE and ARE contact to verify there are no Regional concerns with the request

- Send the MRRE recommendation letter to the ERO Enterprise for review and approval

Upon ERO Enterprise approval of the change, the NERC MRRE Coordinator will notify the LRE, ARE(s), and the MRRE.

If an MRRE seeks to delete one or more registered entities from its MRRE group, the LRE will initiate the process by notifying the ARE(s) and the NERC MRRE Coordinator. After receiving the notification, the NERC MRRE Coordinator will do the following:

- Request the MRRE to provide the reason for removing registered entity(ies)

- Send the completed MRRE change request to the ERO Enterprise for review and approval

Upon ERO Enterprise approval of the change, the NERC MRRE Coordinator will notify the LRE, who will in turn notify the MRRE and the ARE(s).

Program Termination Process

NERC, the LRE, the ARE(s), or the MRRE may request termination of participation in the Program. The MRRE may request termination of its Program participation by submitting a letter to the NERC Coordinator. Upon receipt, NERC will forward the termination request to the LRE and ARE(s). Before discontinuing Coordinated Oversight, the LRE and ARE(s) will determine together how best to transition any ongoing activities under Coordinated Oversight. The LRE may continue to conduct scheduled CMEP activities during this transition period.

Any scheduled CMEP activities will be considered for completion, and any open or pending CMEP activity must be completed prior to processing the termination request.

The ERO Enterprise will review termination and withdrawal requests and establish the termination date. If approved, the LRE will notify the MRRE of the termination date of Coordinated Oversight.

In instances where NERC, LRE, or ARE(s) request termination of a MRRE from the Program, NERC will coordinate the termination requests with the impacted entities, including notifying the MRRE of the termination request. When notified, the MRRE may be requested to provide additional information and will have the ability to petition the request prior to termination from the Program. The ERO Enterprise maintains authority to terminate a Program participant based on changes in criteria considerations and reliability and security risks posed to the BPS.

LRE Reassignment Process

LRE and ARE(s) will periodically review the Coordinated Oversight activities to ensure efficiencies are preserved. The LRE may be changed from time to time, as agreed upon by the ERO Enterprise, based on changes to Program

criteria considerations or potential reliability and security risks to the BPS. In the event of a change in LRE, the NERC MRRE Coordinator will notify the newly designated LRE, who will notify the MRRE in writing and include the cause and justification for the change. The LRE(s) will notify the respective ARE(s). Examples for consideration of reassignment of the LRE include, but are not limited to, registration changes within the MRRE and footprint changes within the MRRE.

Any open or pending CMEP activity must be coordinated prior to ERO Enterprise consideration of the reassignment request.

Section III: MRRE Coordinated Oversight of Compliance Audits, Spot Checks, and Compliance Investigations

This section explains the general expectations for coordination of compliance audits, spot checks, and compliance investigations for MRREs in the Program.

Roles and Responsibilities for Compliance Audits, Spot-Checks, and Compliance Investigations

NERC

NERC retains responsibility for posting the public compliance audit reports for MRRE compliance audits on the NERC website in the folder associated with the LRE.

Lead Regional Entity

The LRE is responsible for coordinating and leading MRRE compliance engagements (compliance audits, spot checks, and compliance investigations), unless an engagement is conducted by NERC or FERC. The LRE's obligations include the following:

- Following the NERC Rules of Procedure, applicable Implementation Guidance, and CMEP Practice Guides

- Coordinating in a timely manner the scope of the MRRE compliance engagement with applicable ARE(s) and ensuring the scope is mutually agreed upon by all ARE(s).

- Ensuring evidence from an MRRE compliance engagement includes evidence from applicable registered entity assets located in all applicable REs, as appropriate based on risk and the declared scope of the monitoring activity

- Completing a consolidated IRA for the registered entity(ies) under the Program with input from the ARE(s)

- Drafting and finalizing all necessary reports related to an MRRE compliance engagement—the report(s) must identify and include all NERC IDs for each registered entity under the MRRE compliance engagement

- Providing the applicable ARE(s) with secure access to all related material for an MRRE compliance audit, spot check, or compliance investigation

Affected Regional Entity

Each ARE is responsible for reviewing information provided by the LRE and providing feedback as needed or requested. Each ARE may participate in a compliance audit, spot check, or compliance investigation.

MRRE Participating in the Program

The ERO Enterprise expects MRREs participating in the Program to ensure all information and data requested as part of the audit, spot check, or compliance investigation are submitted in the required formats and timeframes. These entities are also expected to send all LRE-requested compliance engagement data requests (including completed Reliability Standard Audit Worksheets) to the applicable LRE. The MRREs participating in the Program should direct all questions and concerns on an MRRE compliance engagement to their LREs.

Timing for Key Engagement Deliverables in the MRRE Compliance Process

Lead Regional Entity's Engagement Team Lead

The LRE is responsible for coordinating with each ARE to conduct key compliance monitoring activities, such as IRAs and COP development. Coordination involves collecting and consolidating information from the MRRE across

the LRE and ARE(s). The LRE must plan accordingly to complete these activities before a scheduled compliance audit or spot check.

Before a compliance audit or spot check occurs, the LRE will also do the following:

- Identify the LRE contact person

- Identify the ARE(s) contact person(s)

- Request all confidentiality, training, conflict of interest documents, and team member biographies

- Discuss all Mitigation Plans to be reviewed

- Discuss any Technical Feasibility Exceptions (TFEs) to be reviewed

- Indicate Regional Reliability Standards to be reviewed as applicable

- Determine if any other issues need to be addressed

- Conduct a telephone/web conference call with the MRRE and provide updates regarding

    o The upcoming compliance engagement schedule and dates

    o Processes and procedures to be followed

    o Identification of team members

    o Any other items deemed necessary for completion of the compliance audit, spot check, or compliance investigation in accordance with the CMEP

Engagement Reports
Compliance audit and spot check reports are to be completed using the approved NERC Audit Report Template. ARE(s) are to be identified as parties to the report in both the Executive Summary and Audit Findings section of the report. The entire compliance audit or spot check team will be allowed to review the draft and final reports.

Upon completion of the compliance audit or spot check reports, the LRE will provide the ARE(s) with copies for their records. The LRE is responsible for providing reports to the MRRE and NERC.

Compliance Investigations Process
For investigations not conducted by NERC or FERC, the LRE has responsibility for performing compliance investigations of the MRRE, as described in Appendix 4C of the ROP. The LRE will coordinate efforts with the ARE(s).

Section IV: MRRE Coordinated Oversight of other CMEP Monitoring Activities

The following are the general expectations for coordination of self-certifications, self-reports, periodic data submittals, and complaints processed by the REs for MRREs participating in the Program.

Lead Regional Entity Roles and Responsibilities

The LRE will implement self-certifications, self-reports, periodic data submittal, and complaint discovery methods according to the CMEP for the Program. The LRE will make available to all AREs secure access to evidence submitted by the MRRE in relation to these monitoring methods. Depending on the facts and circumstances, the LRE may rely on the ARE(s) to support specific CMEP activities, such as conducting risk assessments or collecting Periodic Data Submittals. The LRE and ARE(s) will coordinate and specify roles and responsibilities and communicate expectations to the MRRE.

Affected Regional Entity Roles and Responsibilities

If an ARE discovers a possible noncompliance involving a registered entity within the Program, the discovering ARE will notify the applicable LRE. The ARE will provide documentation to support CMEP activities associated with the discovery methods. The ARE will provide input, as needed, to support identification of risks posed to its Region.

Other CMEP Monitoring Activities

Self-Certifications

The MRRE will submit self-certifications to the LRE in accordance with the LRE's Implementation Plan for the NERC CMEP. Should the ARE(s) identify a self-certification needed from the MRRE, the ARE(s) will notify the LRE to initiate and coordinate the self-certification. The DCOC will assist in coordinating efforts with the MRRE.

Self-Reports

The MRRE will self-report all potential instances of noncompliance to the LRE. For self-reports related to system-wide operations, system-wide programs, or specific facilities located within the LRE footprint, the LRE will notify the ARE of the self-reported potential noncompliance. For self-reports related to specific facilities within the ARE footprint, the LRE will notify the ARE and determine the next steps required to designate which RE will administer the processing of the potential violation. The LRE will assign a single NERC tracking ID for each of registered entity's self-reported instance of noncompliance.

If the MRRE has any concerns about unnecessary duplication of effort on any future self-reported potential noncompliance, the MRRE should contact the LRE's staff. The LRE's staff will coordinate with the applicable ARE's staff.

Periodic Data Submittals

The MRRE will submit periodic data submittals to the LRE in accordance with the NERC periodic data submittal schedule. Should the ARE(s) identify a periodic data submittal needed from the MRRE, the ARE(s) will coordinate the data submittal request with LRE. The LRE will request and collect all Periodic Data Submittals from the MRRE according to the NERC compliance data submittal schedule and process. The LRE will share the data submittals applicable to the ARE's Region with ARE(s).

Complaints

Both the LRE and the ARE(s) may receive complaints regarding allegations of an MRRE's possible violation(s) of FERC-approved Reliability Standards or requirements. If the ARE(s) receive(s) a complaint for a registered entity in an MRRE, the ARE(s) will notify the LRE to coordinate review and resolve the complaint. In any case, the LRE

and the ARE(s) will inform each other of the issuance of a complaint, and coordinate the result of the review and the proposed resolution of the matter.

Should NERC, or a RE, receive an anonymous complaint about a registered entity participating in a MRRE, NERC will follow the process outlined in the NERC ROP Section 7.2.1 and will notify the LRE and ARE(s) as appropriate.

Technical Feasibility Exceptions
The LRE is responsible for processing all Technical Feasibility Exceptions (TFEs) submitted by the MRRE, regardless of where they may apply within the MRRE's operations. The LRE will consult and coordinate with the ARE(s) on the TFEs. The LRE and ARE(s) are individually responsible for meeting any obligation to report TFEs to NERC and FERC.

Section V: MRRE Coordinated Oversight of Enforcement

The objective of the MRRE enforcement process is to provide efficient, effective, and coordinated enforcement. The following are the general expectations for coordination of enforcement activities and updates.

Enforcement Roles and Responsibilities
NERC
NERC will provide oversight of the various enforcement and mitigation processes, including but not limited to review of penalties and sanctions imposed under the NERC Sanction Guidelines.

Lead Regional Entity
The LRE will coordinate and lead the enforcement activities for noncompliance involving an MRRE. The LRE is also responsible for the recording, tracking, and reporting requirements of the CMEP for noncompliance associated with an MRRE, including the following:

- Drafting and issuing all relevant notices, requests for information, or other materials the LRE deems necessary to process the noncompliance

- Assessing the overall risk presented by the noncompliance in question for the LRE and for each impacted ARE as appropriate

- Developing a penalty that is commensurate with the reliability impact of the totality of the noncompliance (including the overall risk) and to those levied for similar noncompliance

- Preparing all disposition documents, including settlement agreements, and providing drafts of such documents to the ARE(s) prior to issuance—disposition documents must indicate that the entity is an MRRE and list the RE in which the violation has occurred

- Providing adequate time for ARE(s) to provide written approval of the LRE's proposed disposition method and proposed sanction (if any)

- Levying penalties in reasonable relation to the seriousness of the violation, while also reflecting consideration of the other factors specified in the NERC Sanction Guidelines

The LRE will also coordinate with the ARE(s) regarding the review and acceptance of the MRRE's Mitigation Plans and mitigating activities. The LRE will verify completion of all mitigating activities as necessary, including all activities identified in MRRE Mitigation Plan(s).

The LRE will resolve any disputes or appeals filed by an MRRE with respect to a finding of alleged violation, proposed penalty or sanction, proposed Mitigation Plan, or proposed Remedial Action Directive, in accordance with the applicable LRE's hearing processes and procedures. In the event that a RE other than the LRE has processed the noncompliance,[5] that RE will resolve any appeals filed by an MRRE with respect to a finding of alleged violation, proposed penalty or sanction, proposed Mitigation Plan, and proposed Remedial Action Directive, in accordance with the applicable ARE's hearing processes and procedures.

Affected Regional Entity
The ARE(s) will assist the LRE with implementation of enforcement, including the following:

- Designating its MRRE enforcement point of contact and notifying the LRE of this individual to facilitate the coordination of enforcement activities

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[5] In the event a noncompliance only affects an ARE, the LRE and the ARE may coordinate for the ARE to process the noncompliance.

- Issuing a Notice of Transfer to LRE and a Notice of Dismissal to MRRE for any pending open docket numbers within ARE's footprint upon determination of the LRE—each ARE will close the violation in its system upon the LRE's completion of the enforcement action

- Providing Region-specific information necessary to perform risk assessments and understand the MRRE's risks within the ARE's footprint

Section VI: MRRE Coordinated Oversight of Registration and Certification

This section describes the roles, responsibilities, and process for MRRE registration notification and certification of entities under Coordinated Oversight. In accordance with Appendix 5A of the ROP, NERC has oversight of entity processes performed by the REs for registration and certification activities. NERC will coordinate process execution when an entity is registering or certifying with multiple REs.

Registration Notification

If an entity operates in more than one Region, separate registration applications must be completed and submitted to each of the REs. In other words, participating in the Program does not change the MRRE's registration obligations.

If a registration decision affects an MRRE, the applicable RE will notify the DCOC of the LRE and/or ARE(s) of the changes, including the following:[6]

- New registration requests

- Deregistration requests

- Reactivations

- Changes in NCR

- Name changes

- Changes in footprint

- Deactivation/reactivation requests

- The execution or termination of Joint Registration Organization and Coordinated Functional Registration registrations

REs are responsible for timely notification and discussions, as registration changes may affect risk. REs also will work with NERC to coordinate registration of entities that are required to register with multiple Regions in order to ensure consistency of the registration process for entities under the Program.

Certification Notification

An MRRE initiates the certification process by completing a certification application and sending it to the applicable REs.[7] Each RE will inform NERC and the LRE of the request. The decision to certify changes to an already operating and certified registered entity is a collaborative decision between NERC and the applicable REs. Regarding the Program, the RE certification manager or designee will do the following:

- Notify the DCOC within its Region of upcoming certification needs for entities participating in the Program

- Notify the NERC MRRE Coordinator, the DCOC and Certification Manager or designee of the LRE or ARE(s) of the upcoming certification requirements

- Determine, by working with Certification Managers of the LRE or ARE(s), which RE will provide leadership to manage the certification process

- Share the certification results with the other REs participating in the coordinated oversight of the MRRE

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[6] Each RE has a common registration form posted on its website.
[7] Certification applications are available on each RE's website.

- Verify the certification team assigned to manage the certification process submits the certification recommendation to all applicable REs in a single report, and notify the entity and the NERC MRRE Coordinator of the certification decision

In addition, the DCOC of the Region performing the certification will provide a copy of the certification report to the DCOC of the other applicable Regions and the NERC MRRE Coordinator.

Section VII: MRRE Coordinated Oversight of NERC Alerts

The following are the general expectations for coordination of handling NERC Alerts for the individual registered entities comprising the MRRE.

NERC Alerts Roles and Responsibilities

Lead Regional Entity

The LRE coordinates reminders for submittals, acknowledgments, and approvals required by NERC Alerts. Any required status updates associated with NERC Alerts must be entered by the MRRE into the NERC Alert database for each individual NERC Compliance Registry ID by Region. The LRE will consult and coordinate with each ARE regarding assets located within the ARE footprint which are subject to the NERC Alert. The LRE processes responses from all the entities comprising the MRRE regarding NERC Alerts.

The LRE also coordinates reminders related to reporting to the NERC Alert with the ARE(s). Additionally, if applicable, the LRE also leads and coordinates verification of completion of all remedial actions related to the NERC Alert.

Affected Regional Entity

Each ARE assists the LRE, if requested, in the processing of MRRE responses related to the NERC Alert for assets in the ARE's Region.

Section VIII: MRRE Coordinated Oversight of Education and Outreach

This section describes the general responsibilities regarding education and outreach activities designed for MRREs in the Program.

Education and Outreach Roles and Responsibilities

Lead Regional Entity
The LRE will inform and coordinate with the ARE(s) regarding planned education and outreach activities designed specifically for an MRRE.

Affected Regional Entity
The ARE(s) may provide input to or active participation in the LRE's planned education and outreach activities designed specifically for an MRRE.

Section IX: System Events

Registered entities should assess an event, determine the event category, and notify all relevant REs. This section explains the two components of assessing an event: 1) event analysis and 2) compliance assessment.

Event Analysis

Through the event analysis program, NERC and the REs strive to develop a culture of reliability excellence that promotes and rewards aggressively self-critical review and analysis of operations, planning, and critical infrastructure protection processes. As applicable here, when an event analysis involves multiple REs, NERC and the REs will determine a lead RE for the event, and further communication will take place between the registered entity and the designated lead RE, as detailed in the ERO Event Analysis Process.[8]

Event Compliance Assessment

An important component of the ERO Enterprise's compliance monitoring is registered entity participation in the compliance assessment process after an event or disturbance. The compliance assessment process is a review of the event focused on the evaluation of compliance with Reliability Standards. A registered entity completes a compliance assessment by reviewing the facts and circumstances of an event or disturbance, identifying relevant Reliability Standards and Requirements, evaluating compliance with those Standards and Requirements, and self-reporting to the LRE any potential noncompliance. RE compliance staff also assess significant events and disturbances to increase awareness of reliability risks that may guide further compliance monitoring activities.

Compliance Review Coordination Process

Absent mutual agreement between the LRE and ARE(s) regarding the coordination of event analysis activities, the RE performing the Event Analysis will be the RE completing the compliance review.

When an event analysis involves multiple REs, NERC and the REs will determine a lead RE for the event. The lead RE, if not the LRE, will inform the LRE. If a compliance review is performed, the lead RE will do the following:

- Coordinate the compliance review of the event and completion of associated Issue, Rule, Application, Conclusion (IRAC) document with the applicable RE(s)

- For Category 2 and above, coordinate the completion of the Compliance Evaluation Report and IRAC document with the applicable RE(s)

- If not the LRE, copy the LRE(s) on any reports and documents prior to issuance to NERC or a registered entity

- Place the reports on the NERC secure site

- Review available NERC lessons learned documents to determine whether the compliance trends or lessons learned developed from the Compliance Evaluation process have already been developed by NERC

- Send the closure letter to the MRRE once NERC and the RE(s) approve

- If not the LRE, notify the LRE Compliance DCOC should any compliance monitoring follow-up be indicated and copy the ARE(s)

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[8] Electric Reliability Organization Event Analysis Process, Version 3.0 (Jan. 2017)

Version History

Version	Date	Change Description and Comments
1.0	March 28, 2018	Initial Guide posting.