

NERC Compliance Process Bulletin #2009-CAG-001 Regional Self-Certifications

Version 1.0

March 12, 2009 | Non-Public Process Announcement

The mission of the Compliance Audit Group (CAG) is to promote uniformity across all Regions in execution of the Compliance Monitoring and Enforcement Program (CMEP) and the NERC Rules of Procedure (ROP).

In its role as the auditor of Regional performance relative to the CMEP and ROP, the CAG is required to provide formal observations of the Regions' compliance program implementation to NERC management. CAG staff meets this requirement for audits that they attend by using checklist and reporting procedures described in the 2009 Audit Program Rollout¹. The Regions are required to provide completed self-certifications of all audits (on-site or off-site) that are not attended by CAG staff.

This Bulletin describes the process for which the Regional Entities will complete the Self-Certification form.

- The Regional Entity Audit Team Lead (ATL) downloads the Regional Self-Certification document from the RECM folder on the NERC Web site. The link to the document is:
https://www.nerc.net/datastore/pvtcomply/recm/Compliance_Audit_Group/Regional_Self-Certification.pdf
- The ATL reviews the document prior to the audit. The document is organized in five sections comprising Initial Notifications, Pre-Audit Notifications, Opening Presentation, Audit, and Exit Brief.
- The ATL answers the questions in each section. It is recommended that the questions be completed in stages as the audit proceeds rather than waiting until the end of the audit.

¹ The 2009 Audit Program Rollout is being presented to the Regions in the 1st quarter of 2009

- The ATL transmits the completed document via e-mail to the Region’s primary NERC contact within two weeks of the Exit Brief. Primary NERC contacts are identified in the November 21, 2008 transmittal from the Regional Compliance Program Manager, Ellen Oswald, to the Regional Entity Compliance Managers.
- The completed Regional Self-Certification either certifies that the Region executed the audits in conformance with the CMEP and the ROP or provides the explanation for any noncompliance.

Note:

The five sections contain questions limited to “yes” or “no” answers. This is done to limit the burden on the ATL. There are provisions in the document to allow a more in-depth response or comment by the ATL. Specifically, there is a section for self-reporting deviations from the CMEP or the ROP, and there is a section for describing any issues that have not been captured in the preceding questions. This final section would be an appropriate place to list issues concerning uniform application of reliability standards, among other issues.

If you have questions regarding the process for Regional Self-Certifications, please notify your primary contact.

Ellen Oswald
 Regional Compliance Audit Manager
 609.452.8060
ellen.oswald@nerc.net

Revision History

Version.	Date	Reviewers	Revision Description
1	March 12, 2009	NERC Management and Regional Entity Management	Non-Public Document Available to Regional Staff
1	April 19, 2010	NERC Management	Rescinded as of March 31, 2010

Process disclaimer: NERC reserves the right to issue new process bulletins or modify existing process bulletins when necessary and at its discretion.