

Procedure for Self-Certification

Compliance Procedure 06 (CP-06)

June 18, 2026 | Revision 8

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

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1. Introduction and Purpose

1. All Registered Entities within the NPCC Region are 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.
2. This procedure supports consistency and transparency in the Self-Certification process.
3. The terminology used herein is as defined by the NERC Rules of Procedure (ROP), including the 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.
4. Self-Certifications in Canadian jurisdictions will be conducted under the respective Provincial regulatory structures.

2. Applicability

This CP applies to all NPCC staff involved in planning and executing Self-Certifications and provides information for entities responding to Self-Certification requests.

3. Responsibilities

NPCC Compliance Monitoring is responsible for:

1. Identifying one or more Reliability Standards for a Self-Certification on a schedule determined to be appropriate. Developing and maintaining new or revised Self-Certification forms and posting them publicly prior to the initiation of a Self-Certification requiring the use of the Self-Certification form.
2. Developing the process for submitting the Self-Certification forms and applicable evidence.
3. Providing the Self-Certification instructions and schedules to the Registered Entities. Note that Self-Certification schedules will not be made public.
4. Reviewing submitted Self-Certification forms and applicable evidence to ensure that applicable Registered Entities have met the requirements.
5. Ensuring that each affected Registered Entity has submitted the appropriate Self-Certification forms and applicable evidence.

6. Supporting the use of Align and the Secure Evidence Locker (SEL), or other systems in jurisdictions that do not utilize these systems, for the implementation of Self-Certifications.

4. Process

4.1 Selection of Registered Entities and Reliability Standard Requirement(s) for Self-Certification

Each year as part of annual compliance monitoring scheduling, NPCC selects Registered Entities and Reliability Standard(s) for Self-Certification.

1. NPCC may select one or more Reliability Standards for a Self-Certification on a schedule determined to be appropriate.
2. NPCC shall use the Areas of Focus and Risk Elements identified in the annual ERO CMEP Implementation Plan, the NPCC CMEP Focus Areas, and any other requirement as deemed necessary as the basis for selecting the Reliability Standards and/or requirements subject to a Self-Certification.
3. NPCC shall use the results of the Inherent Risk Assessment (IRA) and Compliance Oversight Plan (COP) process to assist with the determination of which Registered Entities will be subject to a Self-Certification(s) each year. NPCC may also receive input from Enforcement trends, audit teams, and/or NERC. Note that a Self-Certification or a series of Self-Certifications may be used in lieu of an Audit for a Registered Entity as deemed appropriate.
4. Self-Certifications may be performed with or without evidence. Selection of entities for Self-Certifications with or without evidence is determined based on entity risk, compliance history, and other factors identified under the IRA and COP process.

NPCC will consider the following when planning Self-Certifications:

1. NPCC does not schedule self-certifications for Registered Entities subject to an Audit or Spot Check within the same calendar year unless there are facts and circumstances that warrant such inclusion.
2. If a Registered Entity has an open enforcement action for the Reliability Standard and requirements subject to the Self-Certification, NPCC will not include that Registered Entity in the Self-Certification or will remove the requirements for which the open enforcement action exists, unless there are facts and circumstances that warrant such inclusion.
3. 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).
4. If a Registered Entity selected for a Self-Certification is part of the MRRE program with NPCC as an LRE, NPCC will inform the ARE(s) for the planned Self-Certification and identify if the ARE(s) would like to support the engagement. This notification will occur upon or before notification to the entity. Note that NPCC may be notified by an ARE of a request to conduct a Self-Certification for an entity in the MRRE program for which NPCC is the lead. In this circumstance, NPCC will lead and initiate the Self-Certification similar to other Self-Certifications.

4.2 Self-Certification Worksheets and Notification

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 upon Notification. Such documents are provided via email (or other approved method based on Jurisdiction) when the Notice of Self-Certification is provided.

Self-Certification Worksheets

Self-Certification Worksheets are developed for the Standard Requirement(s) scoped for a Self-Certification and are based on the applicable Reliability Standard Audit Worksheets (RSAWs) to ensure that the content and general structure of Self-Certification forms conform to the NERC Reliability Standard(s) and outline evidence requested to support compliance. The Self-Certification Form(s) shall also include a section requesting information on an entity's Internal Controls, though this is not the sole focus of any Self-Certifications.

Regardless of whether a Self-Certification is being performed with or without evidence, the Registered Entity shall follow the Self-Certification Worksheet to independently verify compliance with the selected Requirement(s). As part of completing the Self-Certification, the entity must attest if it is compliant, not compliant, or if the requirement is not applicable.

Self-Certification Worksheets are posted publicly on NPCC's website as resources for all Registered Entities to support compliance.

Entity Notification

NPCC shall issue a Notice of Self-Certification to each Registered Entity subject to a Self-Certification. For entities in jurisdictions that use Align, this will be completed via the Align system with a follow-up email including pertinent documents. For entities in jurisdictions that do not use Align, notification will be solely through email or other appropriate system.

The notification and/or supplemental emails shall include:

1. The notification letter which includes:
 - Whether or not the Self-Certification will be performed with or without an evidence submittal
 - The specific Standard(s) and Requirement(s) selected for the Self-Certification
 - Links to the appropriate Self-Certification Worksheet(s)
 - The requested response date (Note that this will never be less than 60 days from notification)
2. Directions for completing the Self-Certification specific to the system used for the engagement.

4.3 NPCC Review

For Self-Certifications with evidence:

6. NPCC shall review the evidence provided by the Registered Entity to evaluate the entity's determination of compliance, non-compliance, or non-applicability with the Reliability Standard(s) and/or Requirement(s) subject to the Self-Certification.
7. 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.
8. NPCC may require the Registered Entity to provide additional evidence to complete its review or gather additional information.

For Self-Certifications without evidence:

1. NPCC shall review the entity's attestations of compliance, non-compliance, or non-applicability with the Reliability Standard(s) and/or Requirement(s) subject to the Self-Certification.
2. At any point, NPCC may determine that evidence is needed for any of the Requirement(s) in scope of the Self-Certification and may request it from the entity.

For all Self-Certifications:

1. While not normally used, NPCC may choose to perform interviews to support evaluations related to a Self-Certification

2. NPCC may schedule a random Spot Check or include the applicable Reliability Standard(s) and/or Requirement(s) in a subsequent Audit if the facts and circumstances warrant such a Spot Check or inclusion in an Audit. Note that the scope of Self-Certifications will not be expanded due to potential identified issues. If the Self-Certification identifies potential issues with other Reliability Standard(s) or Requirement(s), separate monitoring shall be pursued.
3. If NPCC discovers a potential non-compliance (PNC) as a result of the Self-Certification, NPCC shall inform the Enforcement department of such potential non-compliance for enforcement processing. The Self-Certification team will gather additional information, if required, to appropriately pass along information to the Enforcement team. **IMPORTANT:** NPCC Enforcement will be notified of any identified PNC(s) within five (5) business days of issuance of the Self-Certification Summary Letter using the appropriate method for the Registered Entity's jurisdiction.

4.4 Summary Letter

Following completion of a Self-Certification, the results will be compiled and issued to the Registered Entity in a Summary Letter. This letter will include:

- Whether the Self-Certification was performed with or without evidence
- Engagement conclusions, which may include PNCs, Area(s) of Concern (AOCs), Recommendation(s), and/or Positive Observation(s).

Self-Certification results are shared with the NPCC Enforcement Team and/or the NPCC Registration, Certification, and Risk (RCR) Team as appropriate. For entities in the MRRE program, Summary Letters are shared with the applicable ARE(s).

5. References

1. [NERC Rules of Procedure, Appendix 4C Section 4.2](#)
2. NPCC Compliance Procedure CP-01, NPCC Implementation of the NERC Compliance Monitoring and Enforcement Program (CMEP)
3. [Align and SEL Project Page](#), including User Guides and Training Material

6. Revision History

Owner: Vice President, Compliance

Reviewer/Approver: Director, Compliance or designee

Revision Cycle: This document is reviewed at least every 3 years from the date of the last revision, as dictated by NPCC Policy #653: Policy and Procedure Document Standards.

Revision	Updated On	Effective Date	Changes Made/Comments	Changed by	Reviewer/Approver
0	Column Added 4/30/2026	10/23/2008 (Date of CC Approval)	Original Issue	Column Added 4/30/2026	D. Kidney
1	Column Added 4/30/2026	12/12/2011	Changed title of Process Owner to AVP of Compliance Audits and Investigation; changed Manager, Compliance Program Implementation to NPCC Compliance Staff; Several grammatical corrections.	Column Added 4/30/2026	D. Cerasoli
2	Column Added 4/30/2026	03/19/2014	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 – Section 1; Entire document reformatted.	Column Added 4/30/2026	D. Cerasoli, S. Nied
3	Column Added 4/30/2026	12/03/2015	Replace Self-Certification process with the Guided Self-Certification process.	Column Added 4/30/2026	J. Muir
4	Column Added 4/30/2026	08/16/2017	Quality control changes made to the Guided Self-Certification section of the procedure to match procedure with practice.	Column Added 4/30/2026	Jacqueline Jimenez
5	Column Added 4/30/2026	03/22/2018	Incorporated suggestions from the Compliance Committee self-assessment of the Guided Self-Certification process.	Column Added 4/30/2026	Jacqueline Jimenez

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6	Column Added 4/30/2026	09/26/2018	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.	Column Added 4/30/2026	Jacqueline Jimenez
7	Column Added 4/30/2026	03/20/2019	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.	Column Added 4/30/2026	Jacqueline Jimenez
8	4/30/2026	06/18/2026	Major Revision. Put on new NPCC Letterhead Template. Removed information regarding Self Reporting. Added detail regarding process, tools, and the difference for Self-Certifications with and without evidence.	Kimberly Griffith	Jacqueline Jimenez