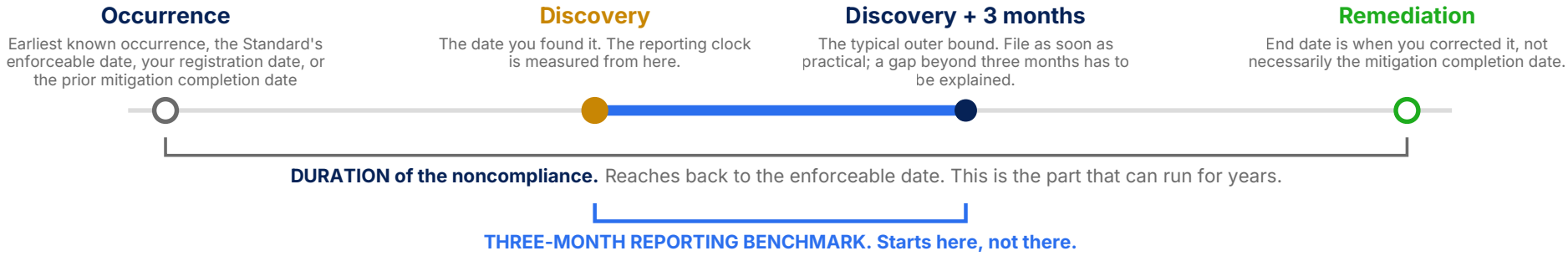
NERC REGISTERED ENTITY SELF-REPORT AND MITIGATION PLAN

THE CLOCK STARTS AT DISCOVERY, NOT AT THE COMPLIANCE DATE

What a Registered Entity puts in front of its Compliance Enforcement Authority once it finds a noncompliance, and when. A site can be years past the date a Standard became enforceable. That history sets the **duration** of the noncompliance, and the CEA may weigh how long discovery took. It does not move the reporting clock. NERC's **Registered Entity Self-Report and Mitigation Plan User Guide** (Version 5.0, October 15, 2024) asks for a Self-Report on preliminary information **as soon as practical but typically within three months of discovery**. If you discovered it last week, the three-month benchmark started last week.



WHAT THE CEA IS GIVEN, IN THE GUIDE'S OWN THREE STAGES (INTRODUCTION, GUIDE P. 5)

01 Self-Report

THE GUIDE'S FOUR ELEMENTS

- Discovery
- Description
- Extent of Condition
- Cause

File on **preliminary information**; fuller detail follows. If gathering the facts will take more than three months, **tell the CEA and ask for guidance on timing**. Unsure it is even noncompliance? A preliminary discussion with the CEA is best practice.

THE CLOCK, STAGE 1

Submit **as soon as practical, typically within three months of discovery**. Undue delay may affect how the CEA determines disposition and penalty.

02 Risk Assessment

THE GUIDE'S THREE ELEMENTS

- Potential impact of the noncompliance
- Actual impact of the noncompliance to the BPS
- Likelihood of impact

Risk is **potential impact multiplied by likelihood**, weighed against the controls that existed at the time. Rated **minimal, moderate, or serious**. Call it moderate and you explain why it was not serious; call it serious and you explain why it was not lower.

NO CLOCK, BUT A TRAP

Assess on the **facts that existed at the time of the noncompliance**, not on assumptions or on facts that developed later. Relevant information you turn up **during the extent-of-condition review or during mitigation still belongs in it**.

03 Mitigation

THE GUIDE'S THREE ELEMENTS

- Completed or in-progress mitigating activities
- Corrective actions to address the noncompliance
- Preventive and detective actions to address recurrence

Submit it **with the Self-Report** once every milestone is known, or later through Align's Mitigation Management module. Each milestone carries a type, a planned date, and an actual date. **Interim Risk Reduction** is required for a Mitigation Plan.

THE CLOCK, STAGE 3

The guide's Mitigation Checklist asks whether milestone intervals are **no longer than three months apart**. Any extension is requested at least **five business days before** the planned date.

"The NERC Sanction Guidelines direct CEAs to consider whether the Registered Entity submitted a Self-Report and whether the Registered Entity voluntarily undertook corrective action." The date you cannot change is the occurrence. The date you can is today.

Source: NERC, Registered Entity Self-Report and Mitigation Plan User Guide, Version 5.0 (October 15, 2024), Introduction and Chapters 1 to 3, confirmed current on NERC's Enforcement and Mitigation page, September 1, 2026. The three-stage structure and bullets are the guide's own (p. 5); quotations are verbatim. NERC states that its guidance "does not create binding norms, establish mandatory Reliability Standards, or create parameters to dictate or enforce compliance with Reliability Standards." **Scope:** this brief follows the Self-Report track, and the guide states that its content "is applicable to both Self-Reports and Self-Logs", so the timing above applies to both. Entities approved for the Self-Logging Program log eligible minimal-risk noncompliance instead, typically reviewed as submitted, under NERC's Self-Logging Program User Guide (April 21, 2026). **Companion brief:** Reading a NERC Compliance Deadline.