Midwest Reliability Organization (MRO)
Self-Certification Process and Instructions

This notification describes the process steps to be completed for the Self-Certification process (hereinafter "Self-Certification(s)"). Registered entities are required to perform specific tasks for the Self-Certification and supply evidence to MRO to support the registered entity's determinations. This document contains information describing the Self-Certification process and details the scope of this Self-Certification.

Self-Certification Process

As part of the Self-Certification, registered entities are required to certify whether or not they are compliant with the applicable Reliability Standards. Through the Self-Certification process, MRO is relying upon the work of the staff from the registered entity to self-determine status of compliance with the applicable Reliability Standards, which are identified in this notice.

MRO staff will review the results from the completed Self-Certification and may re-perform[1] some of this work in order to verify the accuracy of the registered entity determinations. During the review of the Self-Certification, if the information provided is incomplete, MRO staff may request additional information, include the matter in a normally scheduled compliance audit, or conduct a Spot Check of associated NERC Standard and Requirement(s). Pursuant to CMEP §3.2.1, if MRO staff's review of the Self-Certification indicates a potential noncompliance with a Reliability Standard, MRO will notify the registered entity of its determination. The overall goal of the Self-Certification is to provide clarity around compliance with Reliability Standards and provide reasonable assurance of determinations by registered entities of compliance with applicable Reliability Standards in scope for this Self-Certification.

Expected Self-Certification Activities

Registered entities should ensure the following criteria are met when completing the Self-Certification process:

Performance

Those performing the Self-Certification must possess the requisite skill sets to understand the applicability of the Reliability Standards and the independence to conduct the Self-Certification in an impartial manner with adequate management oversight.

Testing

The testing guidance for each of the NERC Reliability Standards in scope for this Self-Certification must be followed. The testing guidance for each NERC Standard and Requirement appears within the Self-Certification Worksheet(s).

Documentation

The MRO documentation guidance for each of the NERC Reliability Standards in scope for this Self- Certification must be followed. The documentation guidance for each NERC Standard and Requirement appears within the Self-Certification Worksheet(s).

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[1] MRO performs an independent review and testing of Standards and Requirements, using the evidence supplied to verify if they are able to reach the same conclusions made by the individual(s) who performed the Self-Certification.

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Evidence

MRO may request additional evidence to support the determinations of each of the NERC Reliability Standards in scope for this Self-Certification. This may include evidence around testing along with other documentation relevant to the Self-Certification that supports the determinations. Evidence guidance for each NERC Standard and Requirement appears within the Self-Certification Worksheet(s). Unless otherwise specified, MRO requests copies of the original, un-redacted and un-combined copies of the Self-Certification evidence in Word, Excel, Power Point format, or the "native" (non-PDF) format. This includes testing documentation, supporting evidence, and any other documented notes that support the entity's conclusions.

Self-Certification Submittal Process-Registered Entities

Final Self-Certification conclusions are entered by registered entities into Align, while all testing documentation, supporting evidence, and any other documented notes that support the Self-Certification determinations are submitted to the ERO Secure Evidence Locker or approved registered entity Secure Evidence Locker.

Completing the Self-Certification in Align

The Align system will automatically display the NERC Reliability Standards in scope for each registered entity's Self-Certification.

1. Log into Align via your ERO Portal Account.

2. Follow the steps on the Align Release 2 User Guide pages 32-46.

3. Self-Certification Responses Available in Align

   a. **Compliant** – No possible violations have been discovered during the Self-Certification monitoring period. This response needs to be used if the entity is applicable to the standard/requirement, but did not have the standard language happen within the monitoring period (such as MOD-032).

   b. **Not Compliant** – A detailed description of the reason for noncompliance must be entered.

   c. **Do Not Own** – Examples of where this response would be acceptable are:

      • FAC-003-4 – entity does not own transmission lines applicable to FAC-003-4 R1 or R2

      • PRC-023-4 – entity does not own load-responsive phase protection systems as described in PRC-023-4 – Attachment A

   d. **Not Applicable** – Examples of where this response would be acceptable would be:

      • MOD-004-1 – the entity does not use Capacity Benefit Margin (CBM)

      • Standards in which the ownership does not meet the applicability guidelines supplied (such as CIP-014 R3-R6)

      • For registered entities that are signatories to a Coordinated Functional

Registration (CFR), a comment must be entered referencing the JRO or CFR number. For example: CFR00001, for the Balancing Authority (BA) function Requirements where the responsible entity is the Midcontinent Independent System Operator, Inc.

Submission of Supporting Documentation via ERO Secure Evidence Locker
Testing documentation, supporting evidence, completed worksheet(s) and any other documentation created that describes how each Self-Certification determination ties to supporting documentation must be submitted to MRO via the ERO Secure Evidence Locker, unless the registered entity has an approved entity Secure Evidence Locker.

When submitting files into the ERO Secure Evidence Locker submission portal, a registered entity must ensure the file names do not contain any CEII data. Please follow the steps in the Registered Entity Portal User Guide.

Self-Certification and Self-Report monitoring methods
If an item of noncompliance is identified for NERC Reliability Standards in scope of this Self-Certification during the Self-Certification submittal period, contact the MRO staff listed below or the contact listed within the Self-Certification Worksheet(s), DO NOT submit a Self-Report in Align to avoid potential duplicate records.

✓ For questions about Align or the ERO SEL portal please contact Kendra Buesgens at 651-855-1707 or kendra.buesgens@mro.net.

Revision History

Date	Notes
12/11/2018	Initial version created.
9/30/2021	Updated to include instructions for Align.
11/30/2023	Removed webCDMS and FTP2

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