



Policy and Procedure 8: Document Retention and Destruction

1. Objective

The objective of this policy and procedure is to set forth the Midwest Reliability Organization (MRO) policies regarding the retention and destruction of corporate documents.

2. Policy

MRO shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements.

“Records” and documents governed by this policy include paper, electronic files (including e-mail), and voicemail records, regardless of where the document is stored, including network servers, desktop or laptop computers, and handheld computers and other wireless devices with text messaging capabilities.

3. Responsibilities

- In accordance with 18 U.S.C. Section 1519 and the Sarbanes Oxley Act, MRO shall not knowingly destroy a document with the intent to obstruct or influence an “investigation or proper administration of any matter within the jurisdiction of any department agency of the United States [...] or in relation to or contemplation of such matter or case.” If an official investigation is underway or even suspended, document purging must stop in order to avoid criminal obstruction.
- If any MRO employee is asked to falsify, alter, or destroy any records, he or she shall immediately inform the Chief Compliance Officer.
- Immediately upon learning of an investigation or court proceeding involving a particular MRO matter or subject, MRO shall notify all employees to preserve all documents and records pertaining to that matter or subject and to cease and avoid any destruction of the documents and records pertaining to that matter or subject that would otherwise be authorized by this record retention and destruction policy.
- In order to eliminate accidental or innocent destruction, MRO has the following document retention policy.

4. Compliance Monitoring and Enforcement Records Policy

Information and data generated or received pursuant to Compliance Program activities, including Compliance Audits, Self-Certifications, Spot Checking, Compliance Violation Investigations, Self-Reporting, Periodic Data Submittals, Exception Reporting, and Complaints, as well as a hearing process, will be retained for the longer of (i) five years or (ii) any retention period specified in an applicable Reliability Standard or by the Federal Energy Regulatory Commission or another Applicable Governmental Authority.

Note that the obligation to retain information and data commences upon the initiation of the Compliance Program activity that produces the data or information. If the information or data is material to the resolution of a controversy, the retention period for such data shall not commence until after the controversy is resolved.



Department	Retention Period	Document Type
Certification	Permanent	<ul style="list-style-type: none"> Final certification reports Final certification review reports Certification Reports led by other Regional Entities NERC Approval Letters to registered entities
	6 years	<ul style="list-style-type: none"> Data received from registered entities Completed questionnaires General correspondences Correspondences <ul style="list-style-type: none"> Requests from registered entities Confirmation from registered entity that report was reviewed
	Destroy	<ul style="list-style-type: none"> Notes (after time to appeal is expired) All supporting documentation of reviews led by other Regional Entities (items are retained by Lead Regional Entity for 5 years) Transmittal correspondence (i.e., "see attached" emails)
Registration	Permanent	<ul style="list-style-type: none"> Requests for registration, letters and/or registration forms <ul style="list-style-type: none"> Including Coordinated Functional Registration and Joint Registration Organizations Requests for changes in registration Denials of registration requests NERC registration letters Final notifications of appeals results Registration metrics (started in 2015)
	6 years	
	6 Years	<ul style="list-style-type: none"> Coordinated Functional Registration updates
	6 Years	<ul style="list-style-type: none"> Facility verification forms Contracts System schematics Facility specifications Results of surveys
	Destroy	<ul style="list-style-type: none"> General questions Requests from NERC to review registration letters
Standards	Permanent	<ul style="list-style-type: none"> MRO Regional Reliability Standards Process Manuals, all versions Regional Reliability Standards (should be archived elsewhere) Regional ballots (should be archived elsewhere) Application Guides with broad applicability Application Guides regarding specific Reliability Standards
	3 years after the standard is retired	
	7 Years	<ul style="list-style-type: none"> General correspondences Committee meeting minutes
	3 Years after the standard is retired	<ul style="list-style-type: none"> MRO Internal Guidance documents



Department	Retention Period	Document Type
	2 Years	<ul style="list-style-type: none"> MRO NERC Standard Review Forum (NSRF) meeting minutes MRO NSRF Standards comments submitted to NERC
	Destroy	<ul style="list-style-type: none"> Transmittal correspondences Application Guides draft documents
Net Energy Load	3 years	<ul style="list-style-type: none"> Annual reports to Finance Department, Finance Department is record holder Annual numbers reported to MRO
	Destroy	<ul style="list-style-type: none"> Requests for annual submittals Transmittal correspondences
Administrative	Permanent	<ul style="list-style-type: none"> MRO position papers
	3 Years after the version is retired	<ul style="list-style-type: none"> MRO procedures MRO responses to NERC data requests
	Destroy	<ul style="list-style-type: none"> Transmittal correspondences

5. Other Records Policy

Document Type	Retention Period ¹
Accounts Receivable/Payable Ledgers/ Schedules and correspondence with vendors.	7 years
Annual audited financial statements, audit reports, general ledgers, internal audit reports, trial balance journals	Permanently
Certificate of Incorporation, Charter, Bylaws, minutes, and other incorporation records	Permanently
Bank Reconciliation	7 years
Bank statements, deposit records, electronic fund transfer documents, and cancelled checks	7 years
Chart of Accounts	Permanently
Company policy & practice manuals	Permanently
Contracts, mortgages, notes and leases (still in effect)	Permanently
Contracts, mortgages, notes and leases (expired)	7 years
Correspondence (general)	7 years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	7 years
Depreciation schedules	Permanently

¹ For records subject to seven-year retention periods, these records shall be retained until entry of a final FERC order, no longer subject to judicial review, on the NERC performance assessment covering the year in which the record was generated.



Document Type	Retention Period ¹
Election records	Permanently
Employment applications	2 years from making the record or taking the personnel action
Garnishments	7 years
Insurance policies, records, current accident reports, claims (still in effect)	Permanently
Insurance policies, records, accident reports, claims (expired)	Permanently
Inventory records	7 years
Invoices to customers and from vendors (including purchase orders and receipt records)	7 years
Loan documents and notes	Permanently
Ownership of property and real estate	Permanently
Patents, trademark registrations, and copyrights	7 years
Personnel files (employee demographic information and compensation records)	7 years
Personnel files (I-9's)	7 years after date of hire or 7 years after termination
Personnel files (payroll records and summaries including records related to employee's leave)	7 years
Petty cash vouchers	7 years
Retirement and pension records including Summary Plan Descriptions (ERISA)	Permanently
Sales records and journals	7 years
Subsidiary ledgers	7 years
Tax returns and worksheets	Permanently
Timesheets	7 years
Vouchers for payments to employees for reimbursements	7 years
Workers Compensation documentation	10 years after first closure