WECC

Monitoring Experience and Self-Certification

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Electric Reliability
& Security for the West

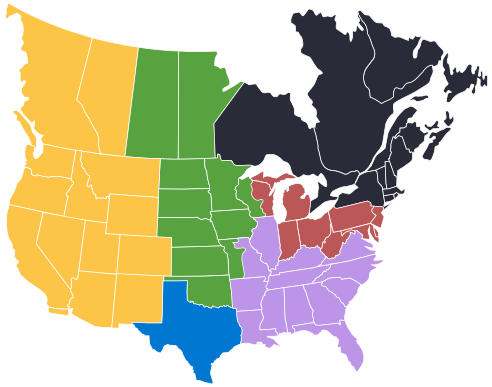
WECC

OUR MISSION

To effectively and efficiently mitigate risks to the reliability and security of the Western Interconnection's Bulk Power System

Oversight Planning

Continent-wide Risks

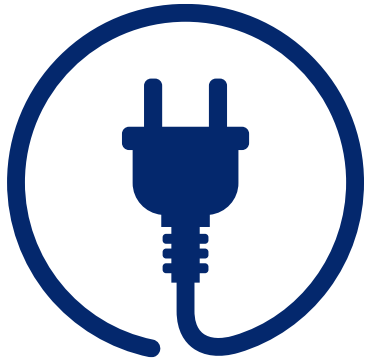


Interconnection Risks

Regional Risks

Entity Inherent Risk

Entity Performance Risks



Monitoring Tools

Audit

Self-Certification

Spot Check

Compliance Investigation

Complaint

Periodic Data Submittal

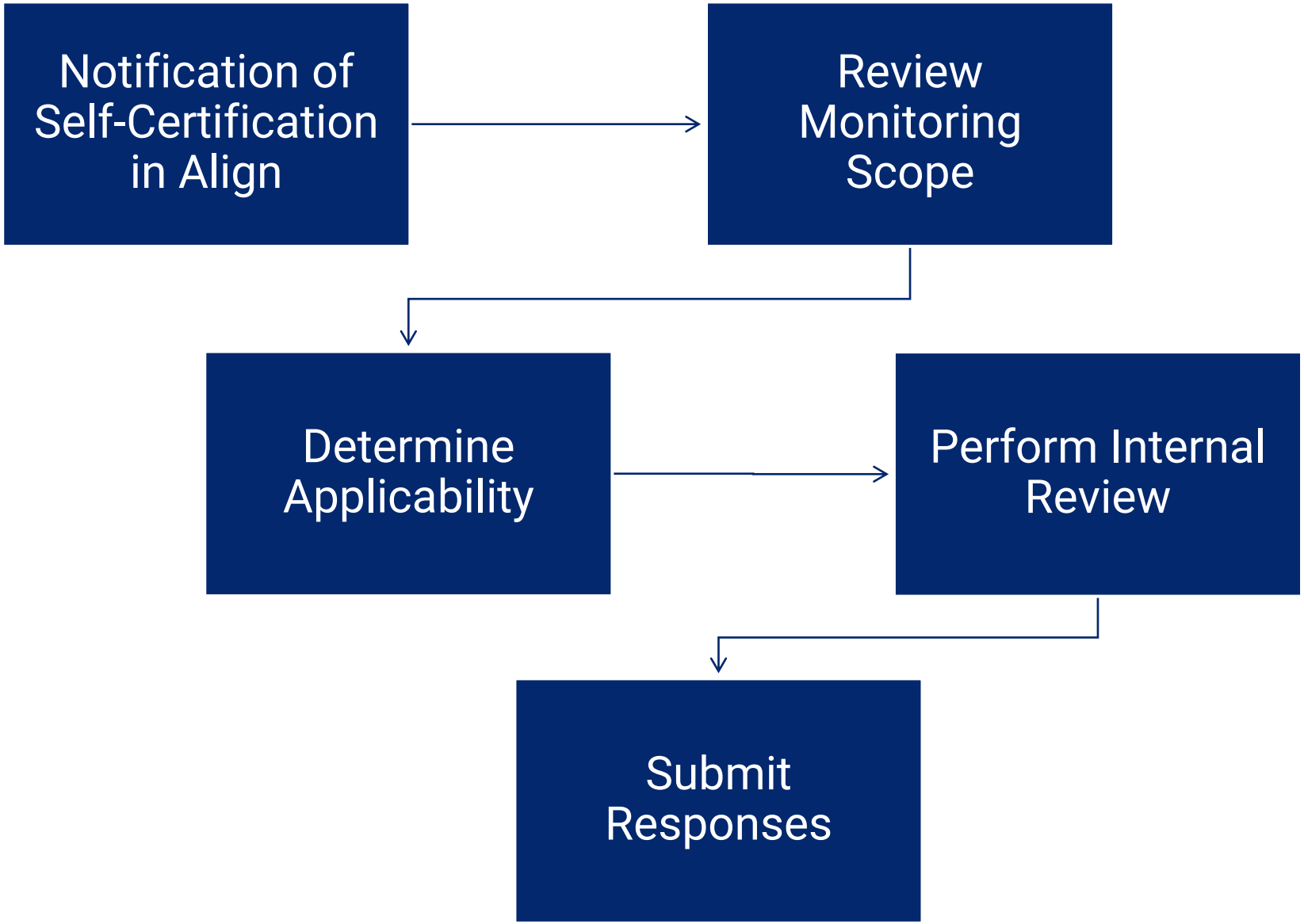
Self-Report

Self-Logging

Self-Certification

- Registered Entities formally assess their own compliance with NERC Reliability Standards and requirements, and certify one of the following:
  - Compliant
  - Non-compliant
  - Not applicable
  - Do not own

Self-Certification



Review the Self-Certification Scope

Start by identifying:

- Specific Reliability Standards and requirement(s) being assessed
- Monitoring period
- Applicable registered functions
- Whether any requests for information (RFI) are included within the notice

Validate Supporting Evidence

Even if evidence is not required with the response, it should be available and reviewed.

- What records demonstrate compliance?
- Where are those records stored?
- Do the records cover the whole monitoring period?

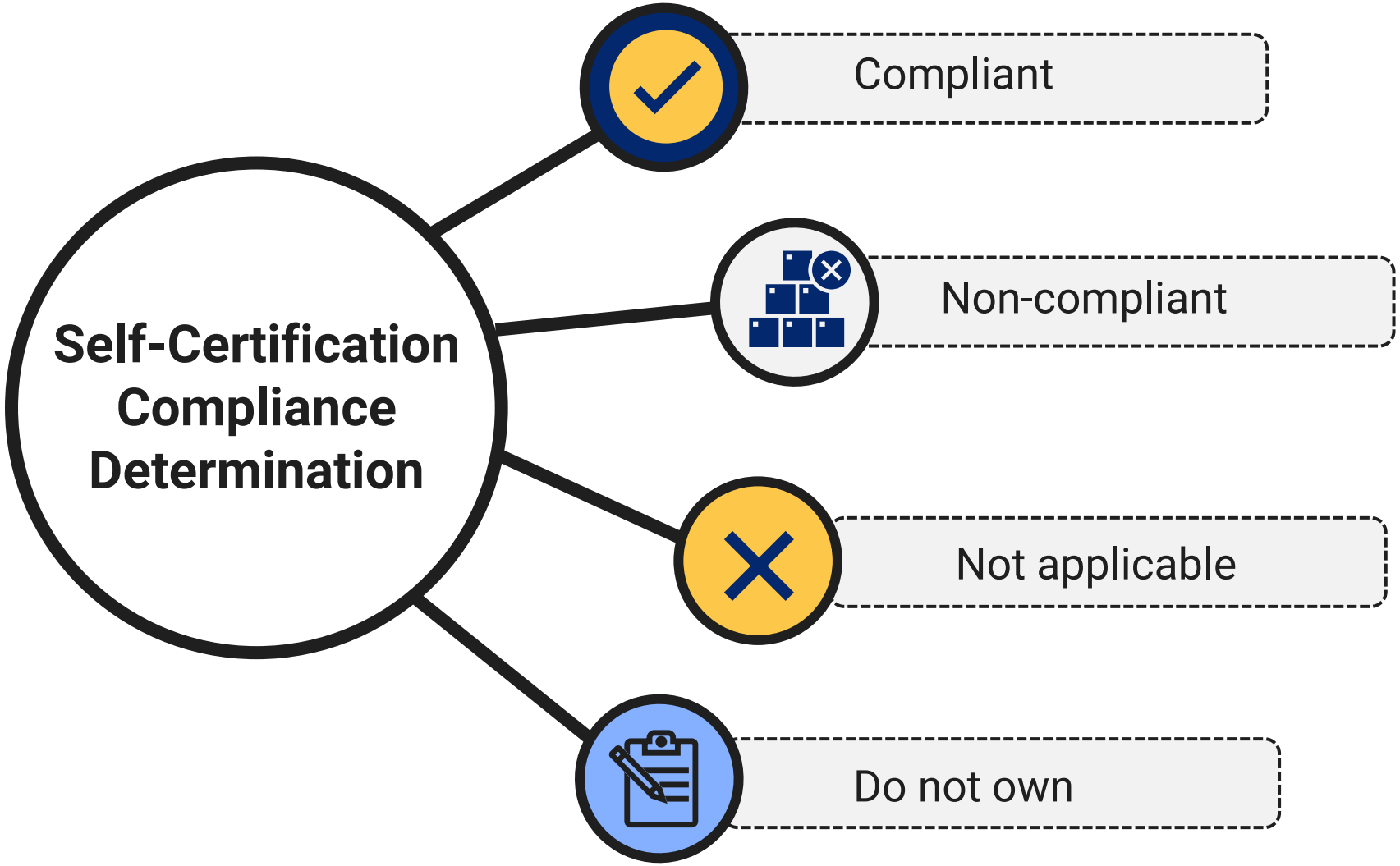
A good question is:

"If WECC requested evidence tomorrow, could we produce it?"

Key Attributes of Quality Evidence

Relevance	• Pertains directly to the monitoring scope and objective
Reliable	• Obtained from a trusted source
Objectivity	• Free from bias and personal sentiment
Timeliness	• Within the monitoring period
Source	• Can be traced to a system of record or developed internally with sufficient controls to identify the creator

Compliance Determination



Compliant

- **If your review indicates no evidence of noncompliance …**
  - Respond “Compliant.”
  - Supporting evidence is not required unless requested.

Non-Compliant

- **If your review indicates evidence of potential noncompliance (PNC) …**
  - Respond “Non-compliant.”
  - If the PNC has not been reported to WECC, create a finding from the Self-Certification.
  - After creating the finding, submit it from the Self-Reports and Self-Logs module.
  - If the PNC has been reported to WECC, provide the tracking ID in the comments field.

Not Applicable

- **If the requirement does not apply to you …**
  - Respond “Do not own” if the requirement does not apply to you because you do not own facilities subject to the requirement as defined in the standard.
  - Respond “Not applicable” if the requirement does not apply to you based on your reliability function(s) or other applicability criteria defined in the standard.
  - Create an applicability attestation from the Self-Certification.

Note: Respond “Compliant” if the requirement is applicable but the circumstances described in the requirement did not occur or no action was required during the monitoring period.

Attestations

- Applicability attestations in Align provide a record for WECC to communicate with entities about compliance obligations.
- Create an attestation request from the Self-Certification for each “Do not own” or “Not applicable” response.
- Include in your request a detailed justification based on applicability criteria in the standard.

Note: Do not create an attestation for “Compliant” or “Non-compliant” responses.

Self-Certification Checklist

Before submitting, confirm you have:

- Saved a response for each requirement in scope
- Submitted a PNC finding for each “Non-compliant” response
- Created an attestation request for each “Do not own” or “Not applicable” response
- Saved a response for any additional questions indicated

Self-Certification Exercise: PRC-005 Protection System Maintenance

Company Background

- Your organization is registered as a Generator Owner (GO).
- WECC has issued a Self-Certification related to protection system maintenance and testing.
- Your generating facility includes:
  - Relay protection systems
  - Battery systems
  - Associated protective devices covered under your maintenance program

Self-Certification Internal Review

During your internal review, your compliance coordinator discovers:

- Most maintenance activities were completed on schedule.
- One relay test was completed 45 days late.
- The test was performed and documented.
- The maintenance procedure does not define how overdue work is escalated.
- A contractor performed the testing, but the entity did not formally review contractor records until after WECC issued the Self-Certification.

Quality Evidence Ranking

Rank the evidence described below:

- Signed relay test report with timestamps
- Screenshot of calendar reminder
- Verbal confirmation from contractor
- Spreadsheet with missing revision history

Self-Certification Exercise: IRO-010-5 Reliability Coordinator Data Specification and Collection

Company Background

- Desert Sun, LLC is a newly commissioned inverter-based resource (IBR) facility in the western United States.
- The facility is registered with NERC as a Generator Operator (GOP) and operates a 150 MW IBR connected to the Bulk Electric System.
- The company has recently completed its NERC registration process and is still maturing its compliance program.
- The operations manager has been assigned responsibility for NERC compliance in addition to operational duties.

Available Information

- The facility has identified its Reliability Coordinator (RC).
- The RC has issued a documented data specification identifying information it requires from registered entities.
- The facility receives requests for operating data from the RC through established communication channels.
- Operations personnel submit required data whenever requested.
- No one has formally retained records demonstrating that the data requests were received and fulfilled.

IRO-010-5 Requirement 3

R2. The Reliability Coordinator shall distribute its data and information specification(s) to entities that have data required by the Reliability Coordinator's Operational Planning Analyses, Real- time monitoring, and Real-time Assessments. *(Violation Risk Factor: Low) (Time Horizon: Operations Planning)*

M2. The Reliability Coordinator shall make available evidence that it has distributed its specification(s) to entities that have data and information required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. This evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, date and contents, or e-mail records.

R3. Each Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Transmission Operator, Transmission Owner, and Distribution Provider receiving a specification(s) in Requirement R2 shall satisfy the obligations of the documented specifications . *(Violation Risk Factor: Medium) (Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations)*

M3. The Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Reliability Coordinator, Transmission Operator, Transmission Owner, and Distribution Provider receiving a specification(s) in Requirement R2 shall make available evidence that it satisfied the obligations of the documented specification using the specified criteria. Such evidence could include but is not limited to electronic or hard copies of data transmittals or attestations of receiving entities.

- What evidence might support compliance?
- What compliance risk is visible in the scenario?

Additional Information

During preparation of the Self-Certification, a compliance analyst states:

"Operations says they always send the requested information, but we cannot locate records older than three months."

- Can the entity confidently certify compliance?
- What additional records should be gathered?
- What evidence retention controls should be implemented?

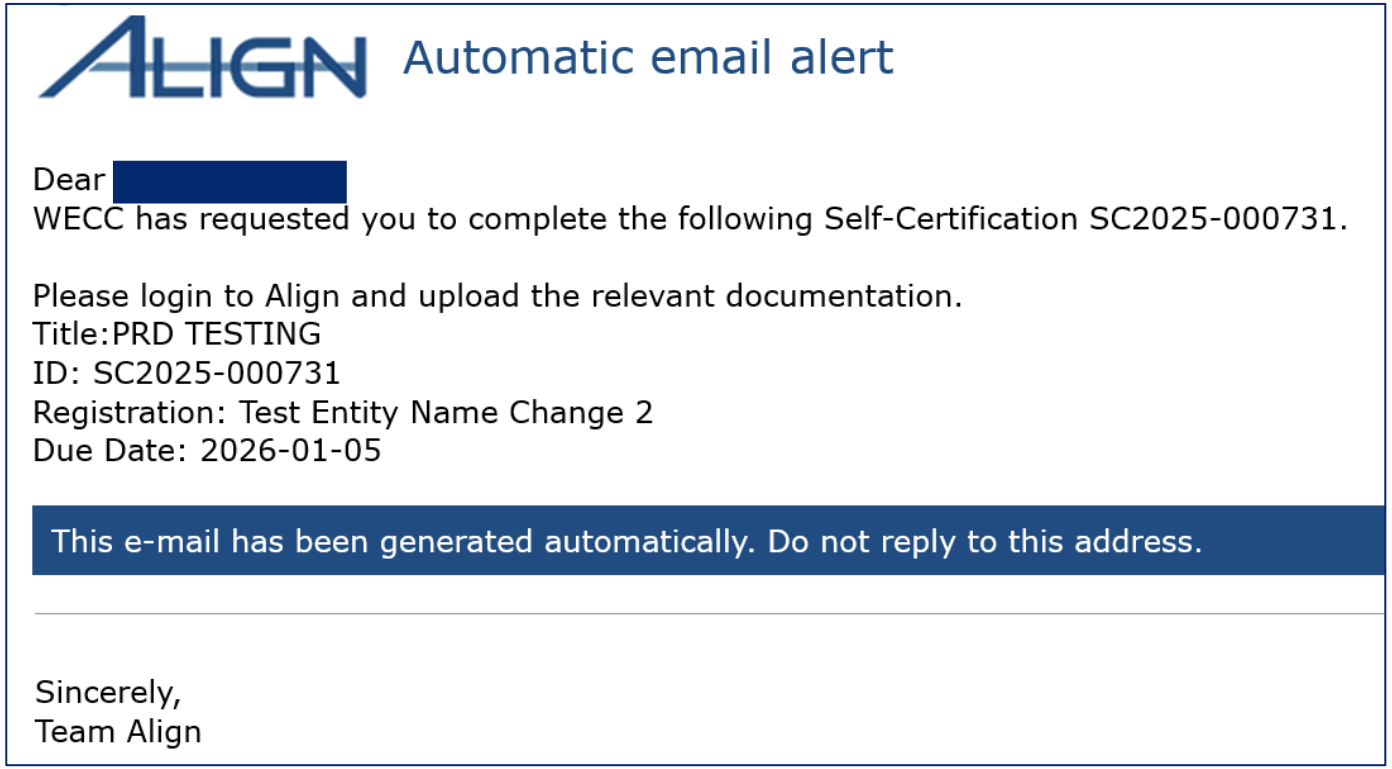
Common Mistakes

- Assuming compliance means only performing the task
  - Compliance also requires demonstrating the task was performed.
- Waiting until an audit to collect evidence
  - Evidence should be retained routinely.
- Assuming operations personnel understand compliance obligations
  - Compliance responsibilities should be documented and communicated.
- Treating Self-Certification as a simple administrative form
  - Self-Certifications are official attestations.

Responding to the Self-Certification in Align

Notification of Self-Certification: Align

Entities receive email alerts from Align when WECC initiates a Self-Certification request.



ALIGN Automatic email alert

Dear [redacted]
WECC has requested you to complete the following Self-Certification SC2025-000731.

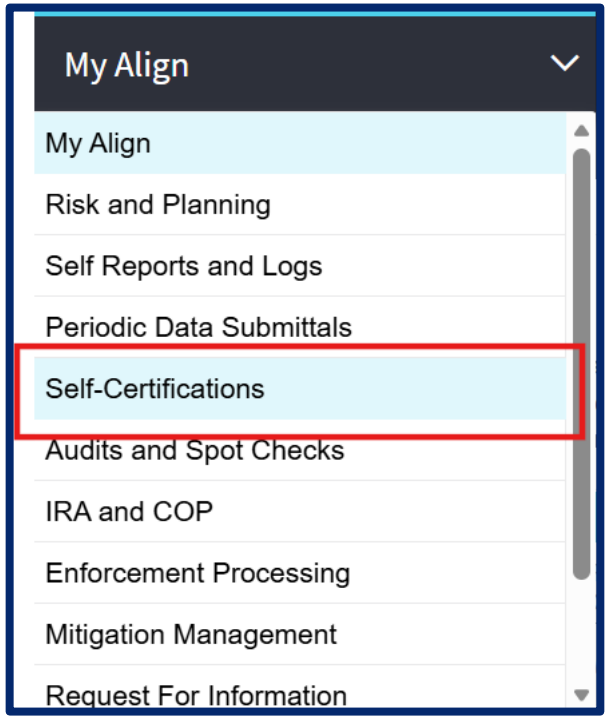
Please login to Align and upload the relevant documentation.
Title:PRD TESTING
ID: SC2025-000731
Registration: Test Entity Name Change 2
Due Date: 2026-01-05

This e-mail has been generated automatically. Do not reply to this address.

Sincerely,
Team Align

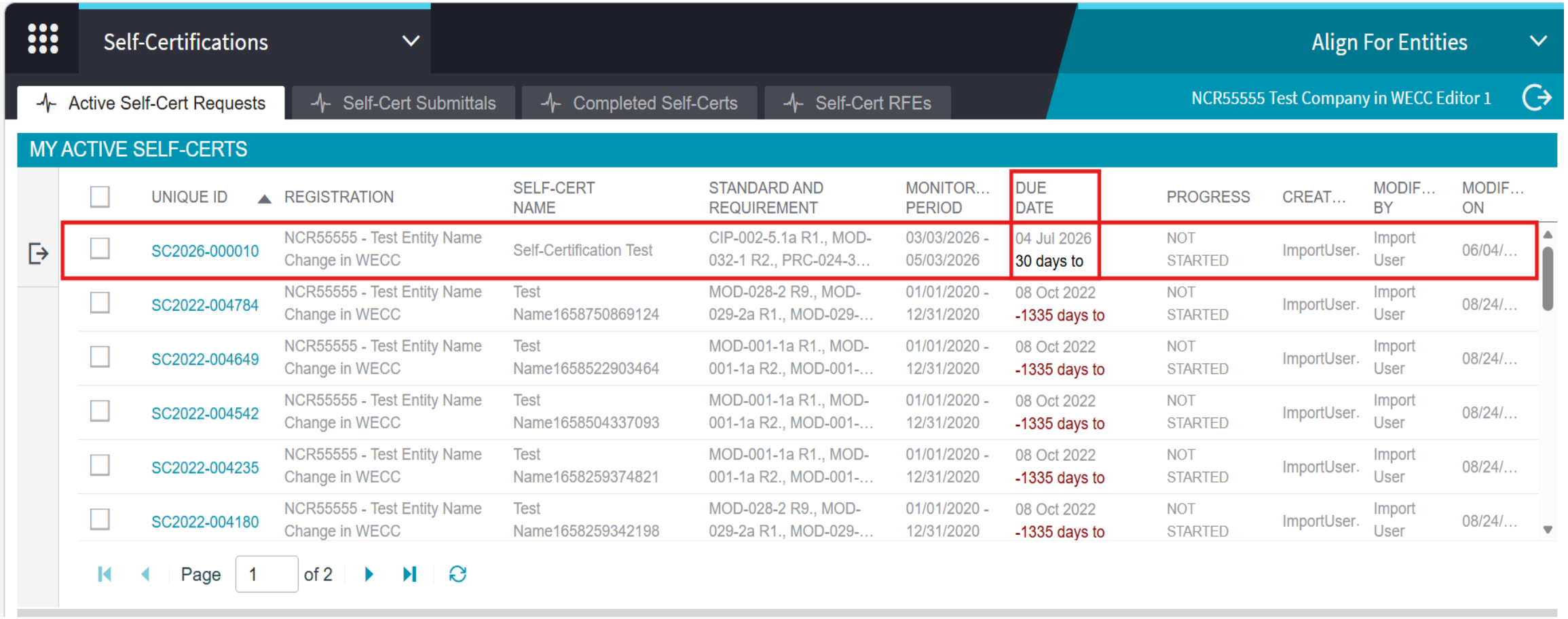
Navigating to Self-Certs

Navigate to the Self-Certifications tab using the main dropdown menu.



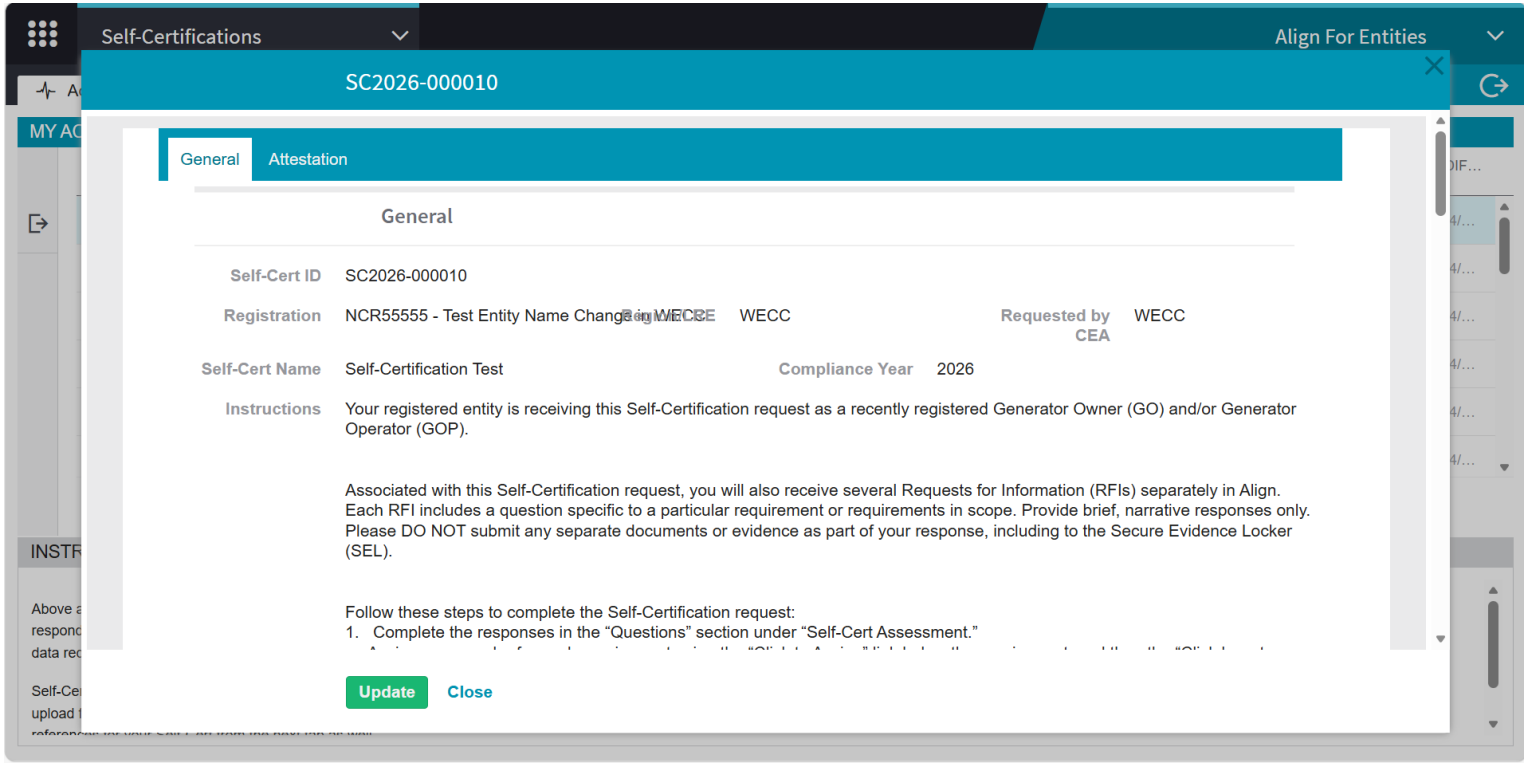
Self-Certifications: Opening and Due Date

Click the blue Unique ID to open the Self-Certification record. The due date for each Self-Cert can be found in the “Due Date” column.



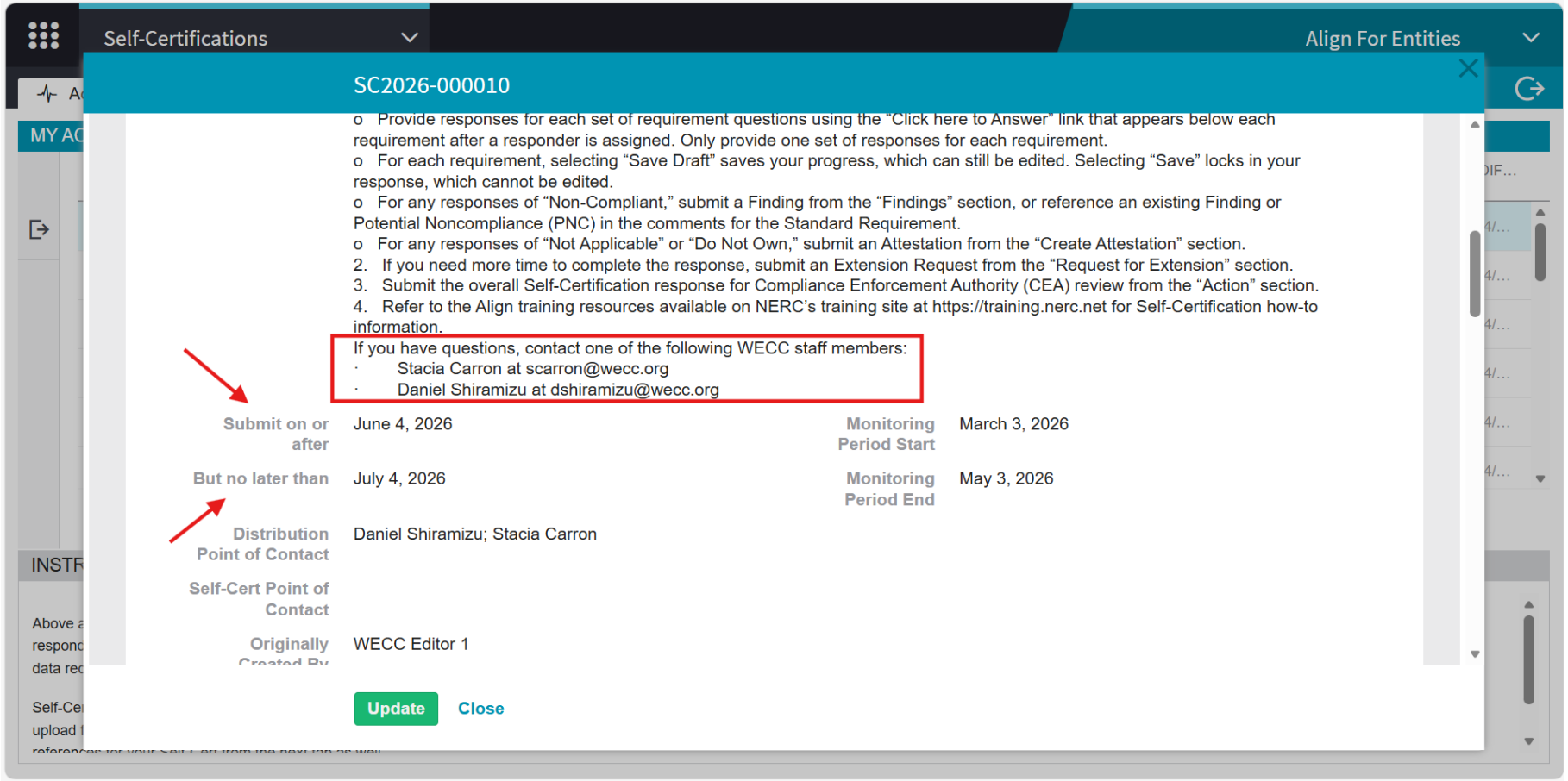
Self-Certifications: General Information

Once opened, you will see general information regarding the Self-Certification, including instructions on how to complete the request.



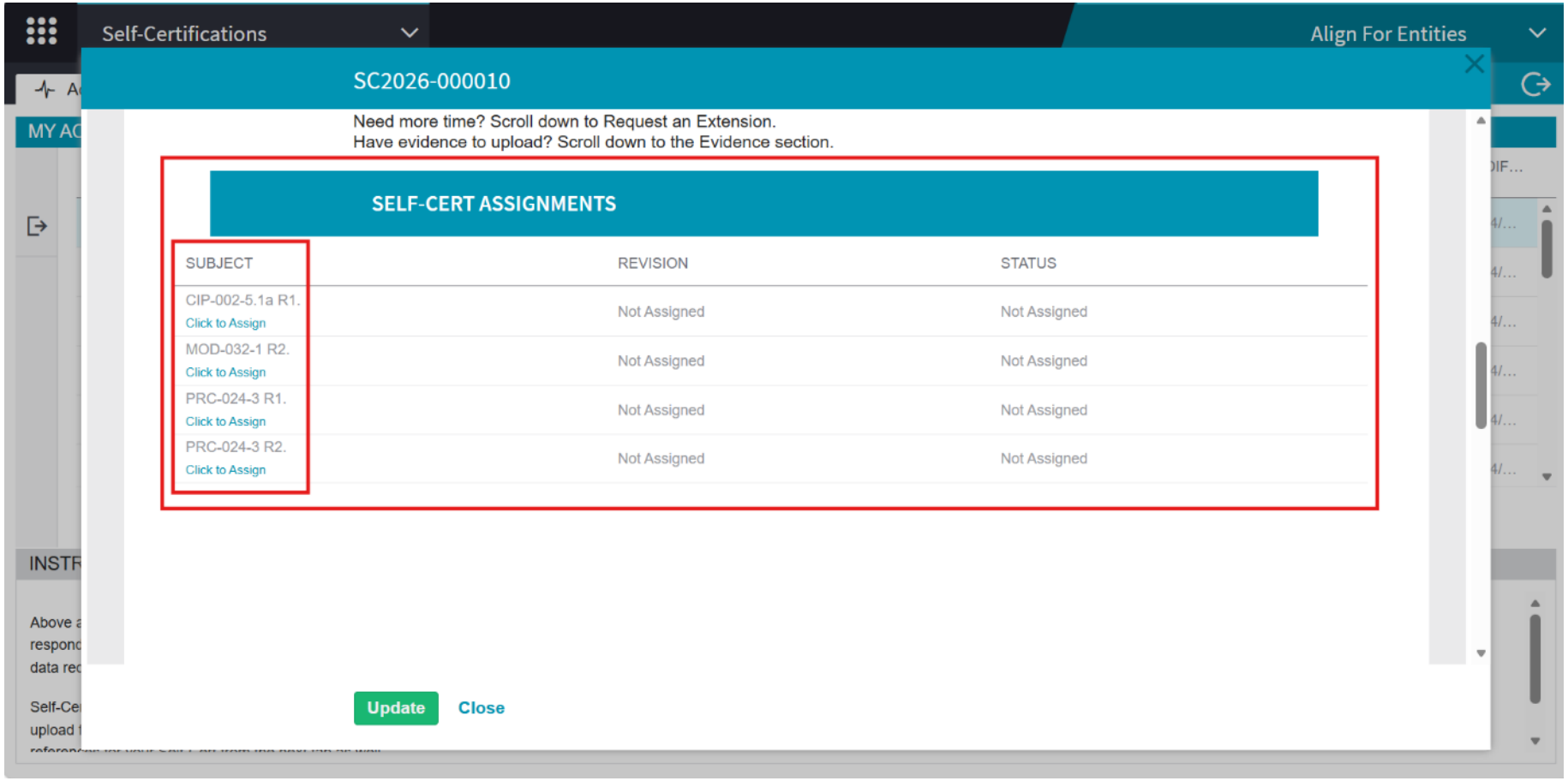
Self-Certifications: Due Date and Contact Info

Due date and contact info can also be found near the bottom of the “General” section within the Self-Certification record.



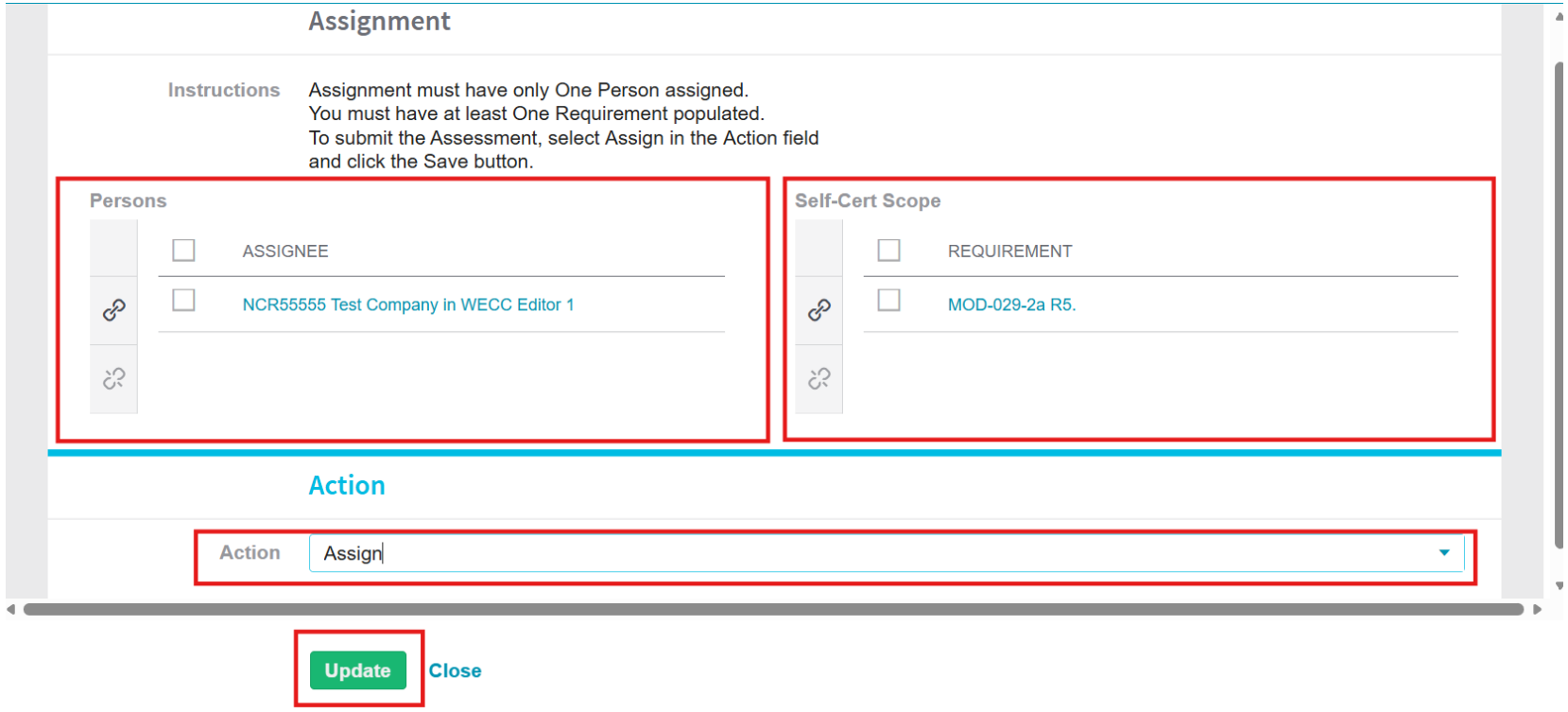
Self-Certifications: Scope

Find a list of Standards and Requirements in scope under “Self-Cert Assignments.”



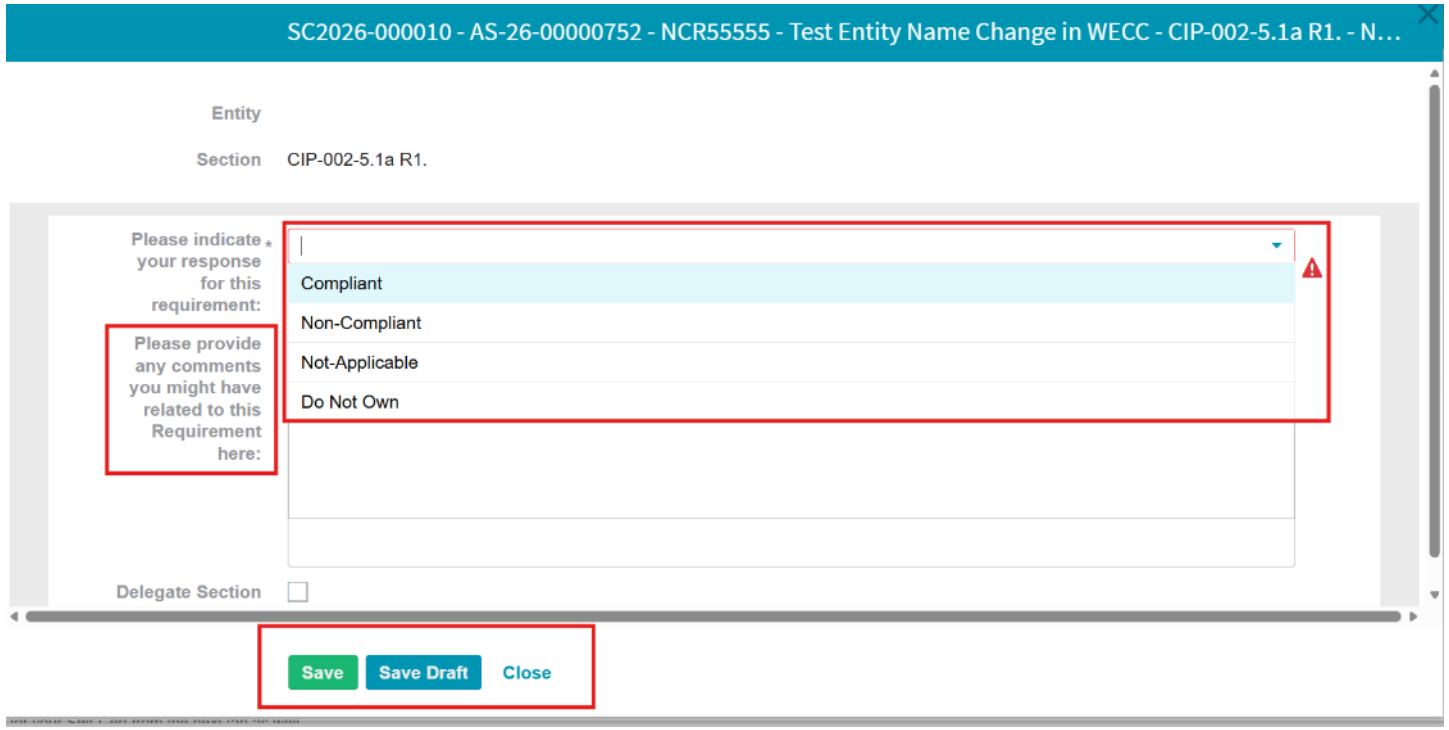
Self-Certifications: Assigning a Respondent

Click the link icon to chose a respondent. Link to one or more requirements. Choose “Assign” from the “Action” dropdown menu. Finally, click the green “Update” button.



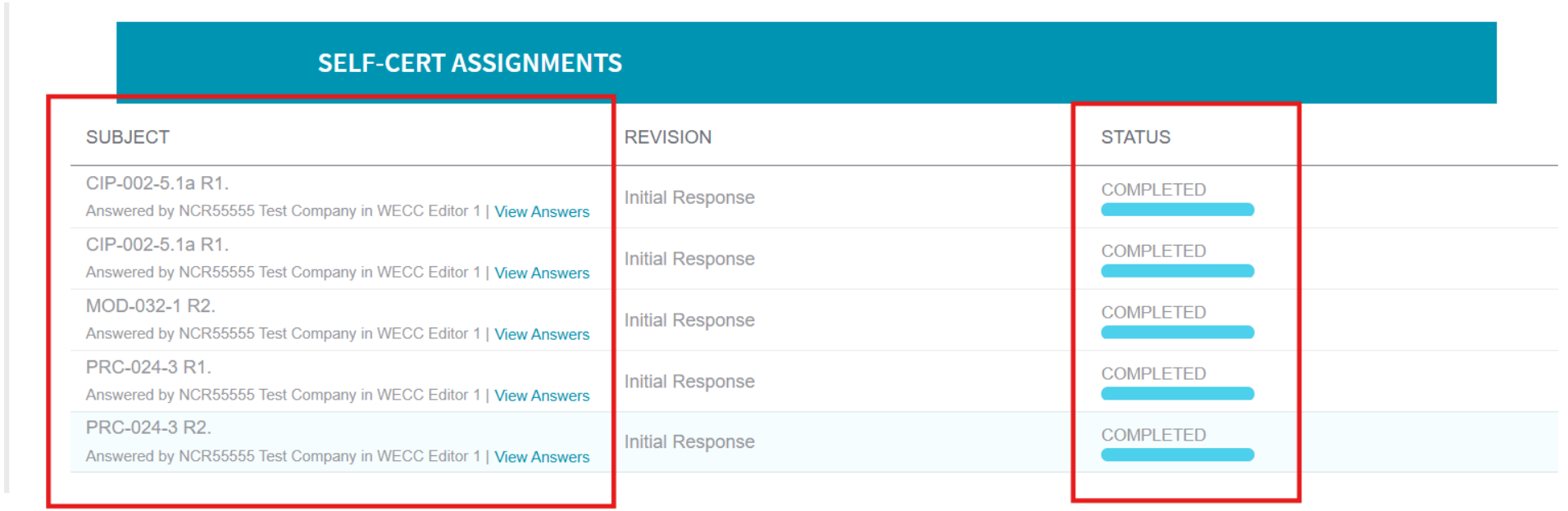
Submitting the Self-Certification in Align

Once assigned, click the blue text under the Standard to open the response panel. Select the appropriate response, provide any necessary comments, and click “Save” to submit OR “Save Draft” to edit later.



Self-Certifications: Submitting in Align

After each assignment is filled out and saved, a progress bar that says “Completed” will appear in the right-hand column.

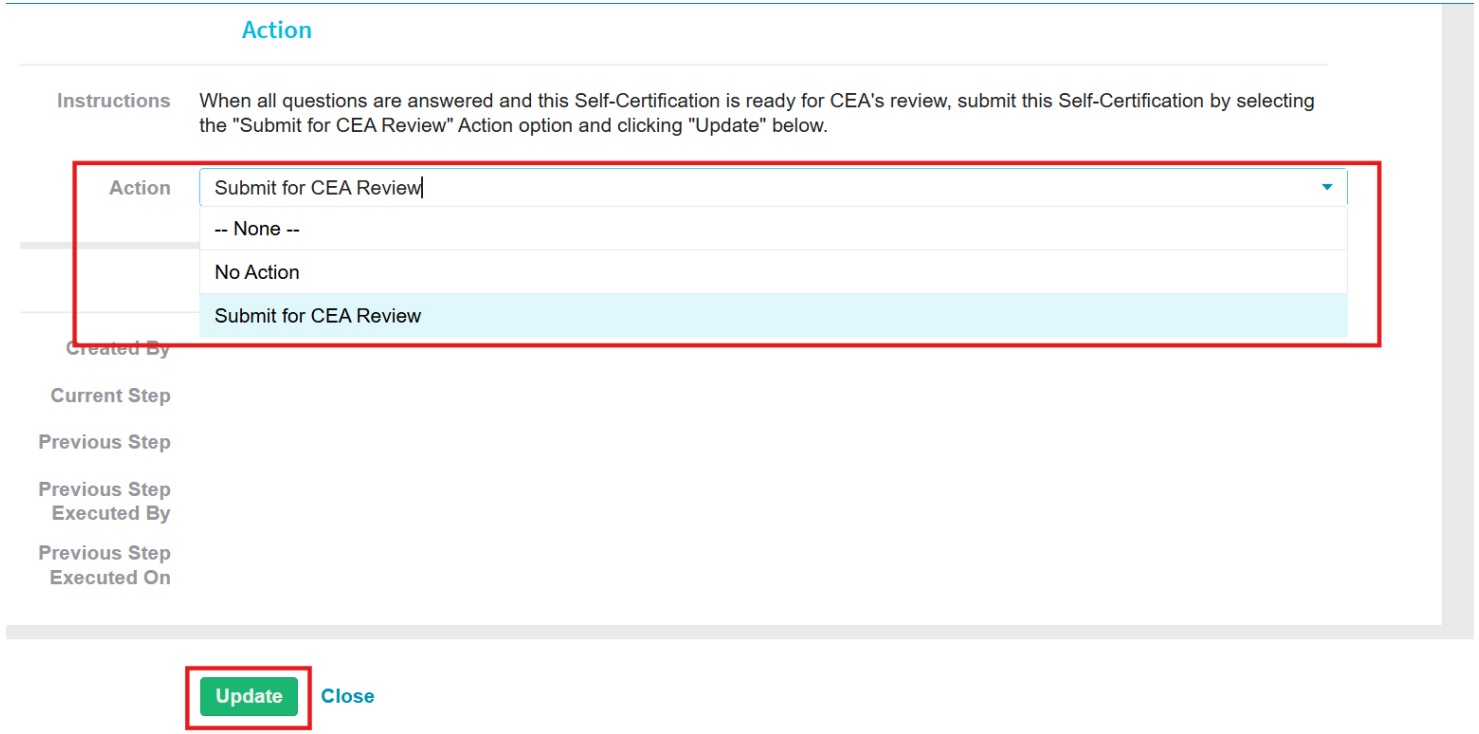


SELF-CERT ASSIGNMENTS

SUBJECT	REVISION	STATUS
CIP-002-5.1a R1. Answered by NCR55555 Test Company in WECC Editor 1 | View Answers	Initial Response	COMPLETED
CIP-002-5.1a R1. Answered by NCR55555 Test Company in WECC Editor 1 | View Answers	Initial Response	COMPLETED
MOD-032-1 R2. Answered by NCR55555 Test Company in WECC Editor 1 | View Answers	Initial Response	COMPLETED
PRC-024-3 R1. Answered by NCR55555 Test Company in WECC Editor 1 | View Answers	Initial Response	COMPLETED
PRC-024-3 R2. Answered by NCR55555 Test Company in WECC Editor 1 | View Answers	Initial Response	COMPLETED

Submitting the Self-Certification in Align (Final Step)

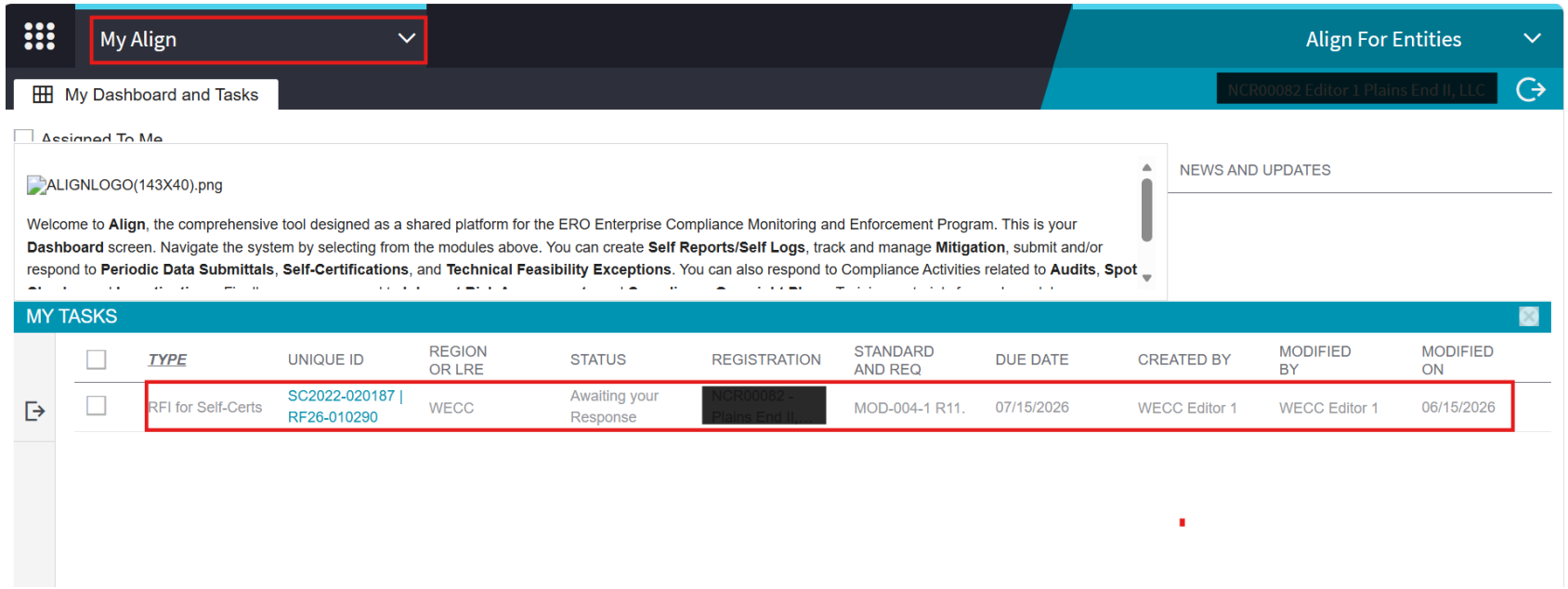
Once all assignments have been completed, scroll down to the “Action” section. In the “Action” dropdown, select “Submit for CEA Review.” Then click the green “Update” button to officially submit the self-cert.



Responding to Self-Certification Requests for Information

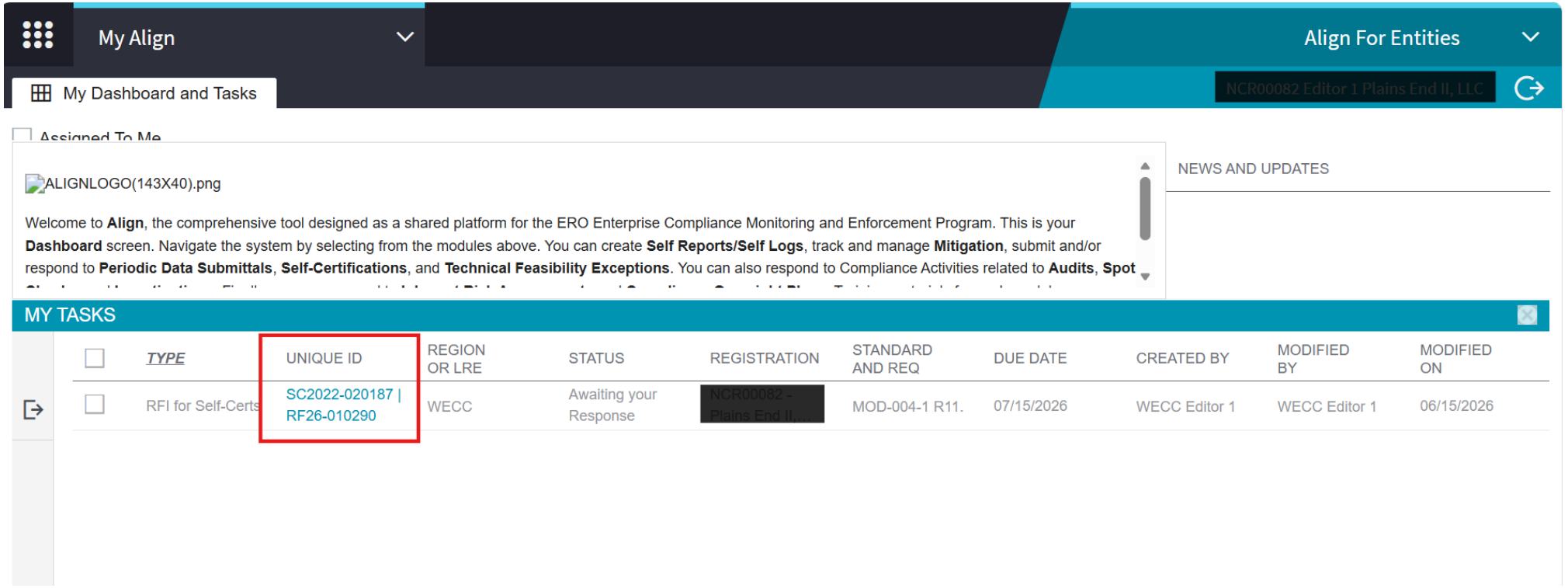
Requests for Information for Self-Certs

RFIs related to Self-Certs can be found in the “My Align” Dashboard. Under “Type,” it will say “RFI for Self-Certs.”



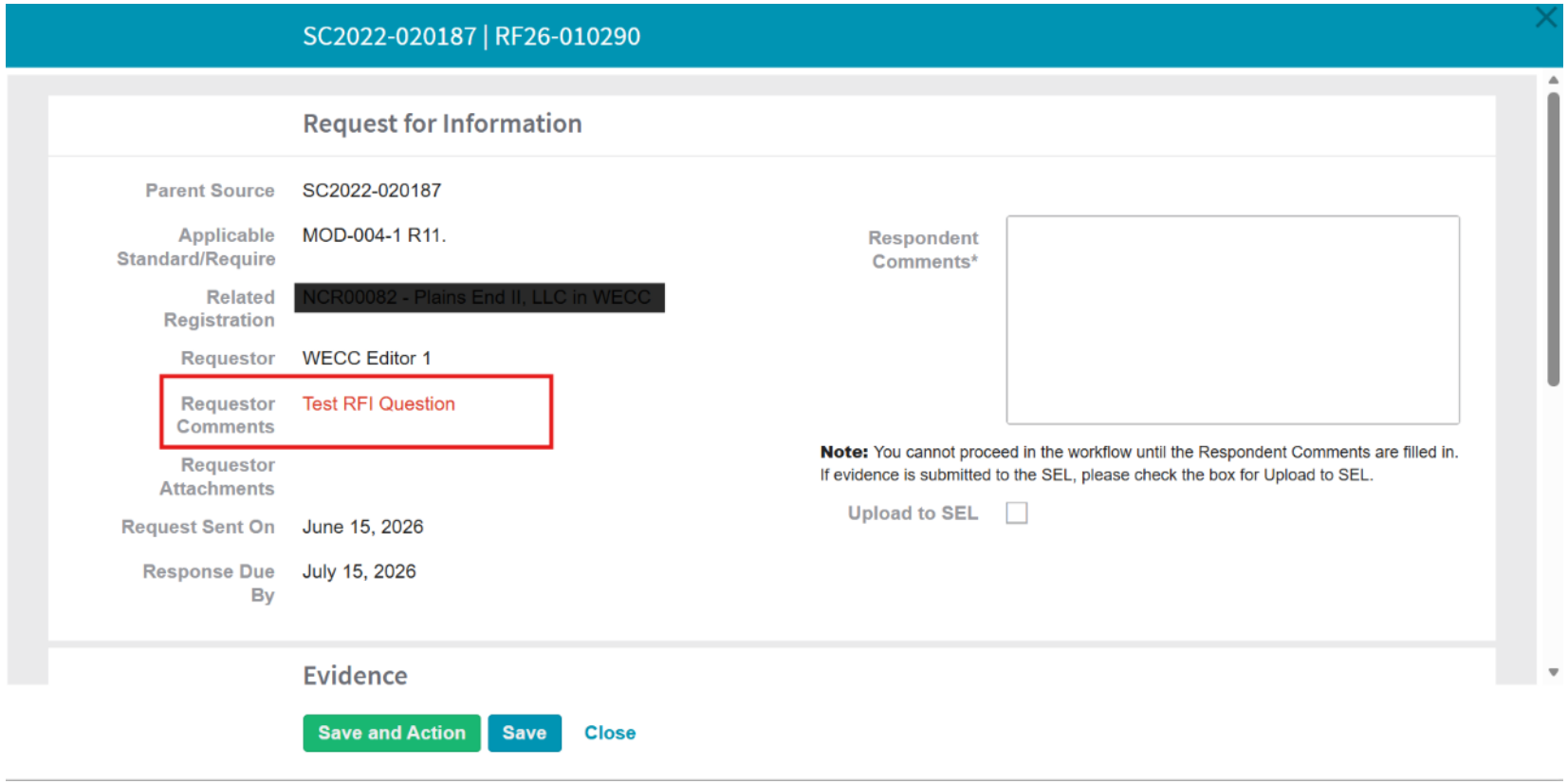
Responding to RFIs (Step 1)

Click the blue Unique ID to open the RFI.



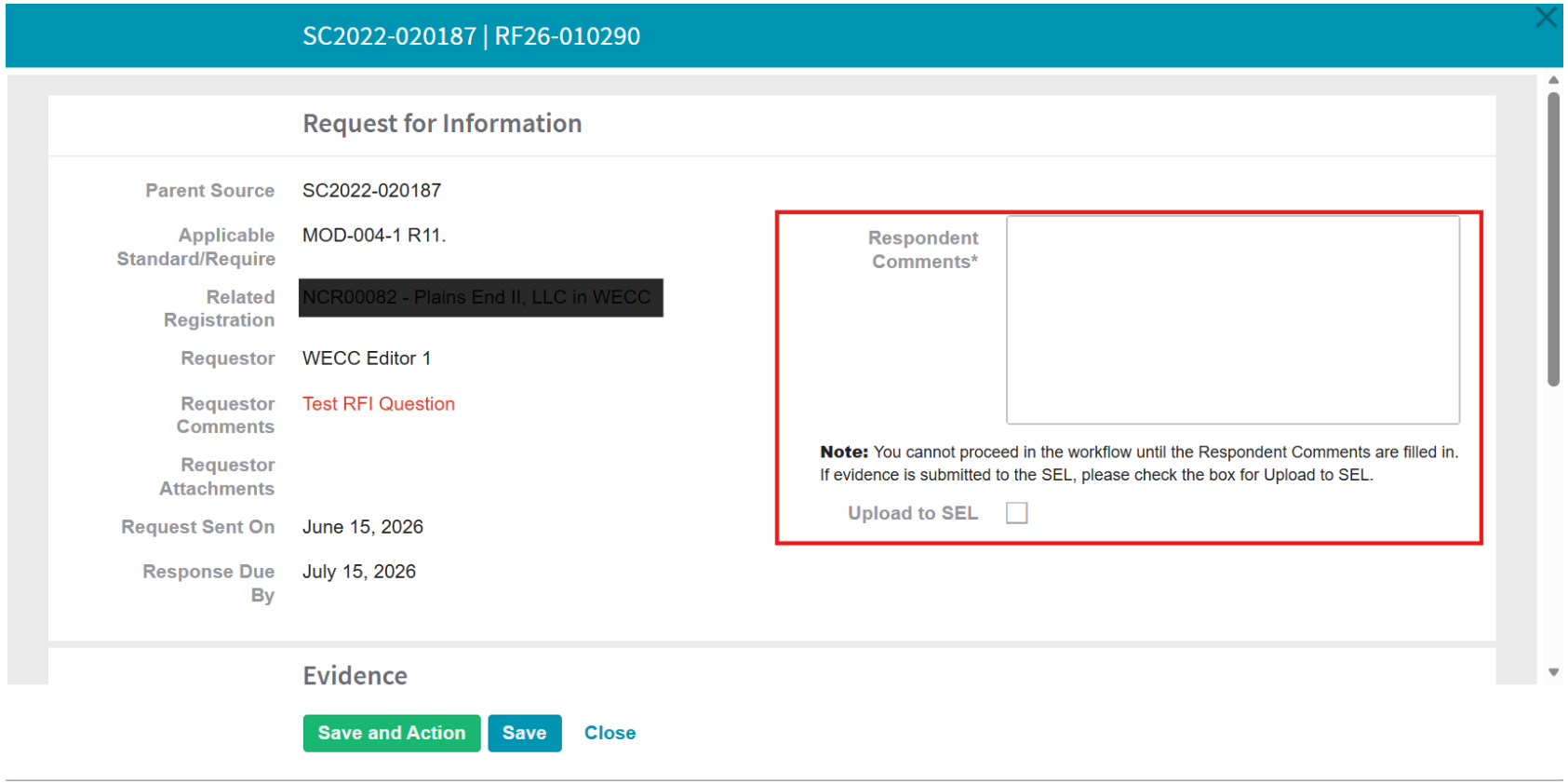
Responding to RFIs (Step 2)

RFI questions will be located next to “Requestor Comments.” Read all questions and instructions carefully.



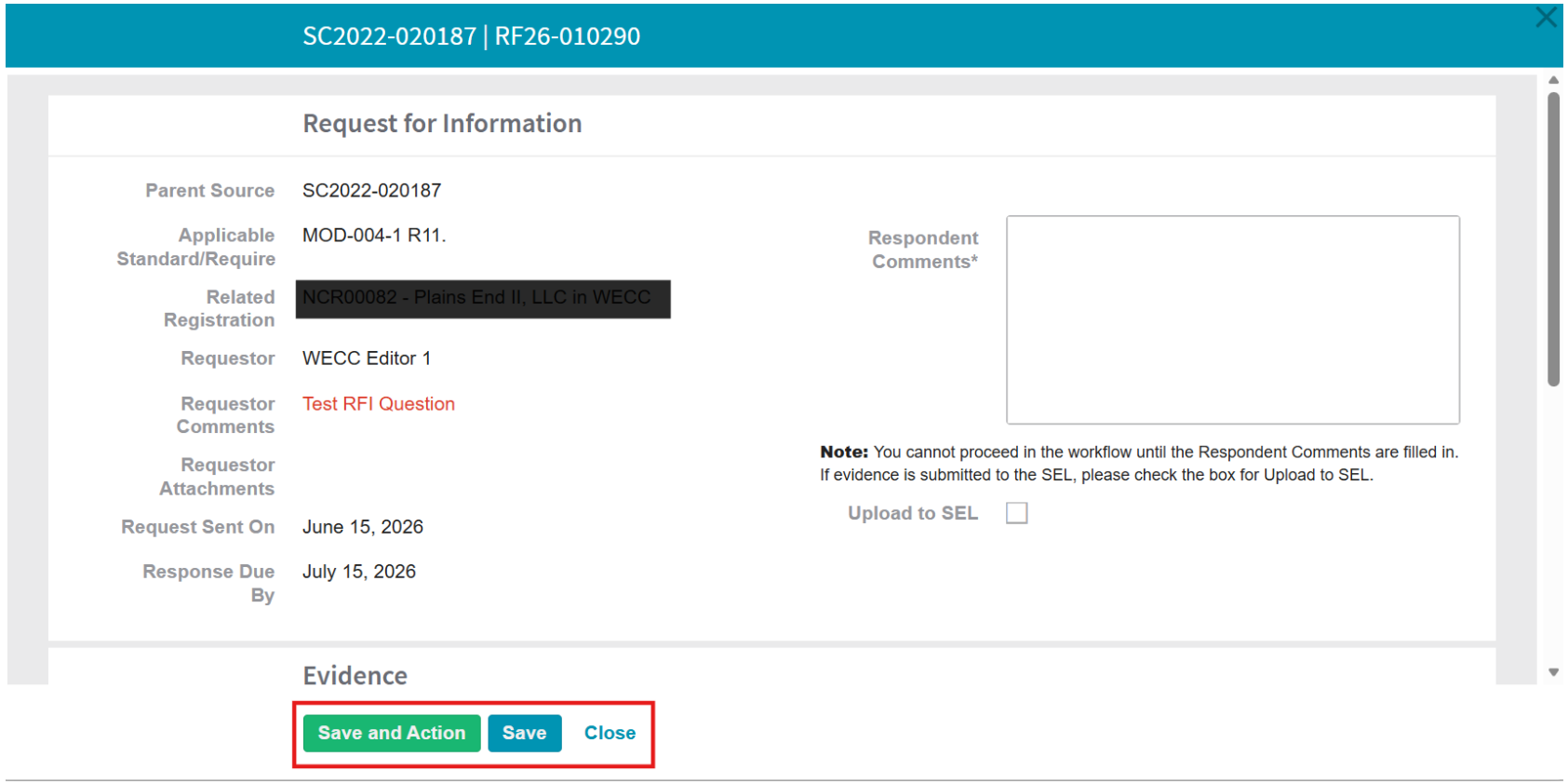
Responding to RFIs (Step 3)

Type your answers to the RFI questions in the “Respondent Comments” box.



Responding to RFIs (Step 4)

When finished, click “Save and Action” to submit OR “Save Draft” to edit later.



ELECTRIC RELIABILITY & SECURITY FOR THE WEST

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