

Self-Report and Mitigation Checklist

This checklist outlines information WECC frequently needs to process Self-Reports, Self-Logs, and mitigation. Consider these suggestions as well as what other information may be required given the individual facts and circumstances of noncompliance.

The checklist is adapted from the [NERC Registered Entity Self-Report and Mitigation Plan User Guide](#), which provides additional recommendations and examples.

Discovery

- Describe the events leading to discovery of the noncompliance, including dates, individuals, and business processes involved.
- Describe any internal controls affecting discovery and their function and adequacy.
- If discovered in preparation for a compliance monitoring engagement or during mitigation of another noncompliance, explain the relationship.
- If discovered due to a [reportable event](#), provide the event date and category.
- Explain any delay greater than three months in reporting noncompliance after discovery.
- Identify any similar noncompliance previously reported to WECC or another Regional Entity.

Description of Noncompliance

- Describe how the Reliability Standard was violated and the surrounding facts and circumstances. Relate the description to the Standard language.
- Specify the type, number, location, and criticality of affected BES facilities or assets.
- Describe the root, apparent, and contributing causes, if known.
- If the noncompliance began under a previous Standard version, identify which one.
- Coordinated Oversight participants must identify all registrations and Regions affected.

Duration

- Identify the dates the noncompliance started and ended. The end date is when the Registered Entity returned to compliance (remediated), not necessarily when mitigation was completed.
- Explain how these dates were determined.

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Extent of Condition (EOC)

- If an EOC review has been performed, identify the processes, procedures, controls, assets, facilities, or personnel affected by noncompliance.
- Describe how the review was performed, the evidence reviewed, and the timeline selected.
- Explain why this level of review was appropriate.
- Confirm noncompliance was limited to the original instance(s) or identify any additional instances found.

Root Cause

- Identify the root and any contributing causes, if known.
- Describe the events and circumstances leading to the issue.
- Describe the root cause analysis process, participants, and roles.

Risk and Impact

- Explain the actual or potential impact resulting from the noncompliance.
- Describe system conditions and the size, number, and criticality of affected facilities or assets.
- Identify any actual or potential misoperation or loss of a Protection System device, degradation or loss of a BES element, loss of a BCS or BCS Information, unauthorized BCS access, or other harms.
- Explain the likelihood of this impact. Consider the circumstances, previous noncompliance with a similar cause, and the same failure mode in other systems, facilities, or staff.
- Explain any mitigating internal controls and their function and adequacy.

Mitigation Milestones

- Explain the actions taken and the internal controls created or revised to address the issue and prevent recurrence.
- Ensure mitigation fully addresses all instances and causes of noncompliance.
- Create relevant, measurable, and realistic milestones with proposed completion dates no more than 90 days apart.
- Include how any revised controls, procedures, policies, or documents were communicated to relevant personnel or third parties.

Interim Risk Reduction

- Describe all steps to reduce or eliminate interim risk while mitigation is in progress.

