Self-Certification Process

As part of the Self-Certification process, Texas RE expects registered entities to certify whether or not they are compliant with in-scope NERC Reliability Standards. However, submittal requirements have been enhanced for the registered entity responsibilities to clearly demonstrate compliance. Entities are required to identify and upload to the ERO Secure Evidence Locker (SEL) supporting evidence gathered while completing the Self-Certification. Finally, entities are responsible for providing documentation that ties supporting evidence provided in the SEL to support the entity's Self-Certification conclusions.

These requirements exist so Texas RE can place reliance upon the results of Self-Certifications, which can be administered in place of other compliance monitoring tools when appropriate. One of the goals of the Self-Certification process is to reduce time and resource burden historically experienced by entities and Texas RE. The concept of relying upon the work of others is based upon professional standards that appear within the Generally Accepted Government Auditing Standards, also known as the Yellow Book. The Yellow Book provides a framework for conducting high quality audits with competence, integrity, objectivity, and independence.

Texas RE will perform a review of the evidence provided by the entity to support the Self-Certification results. In order to verify the accuracy of the Self-Certification conclusions, Texas RE may, in some cases, re-perform some of the work completed by the entity through an independent review and testing of Requirements using the evidence supplied. The independent review is to verify the ability to reach the same conclusions made by the personnel who performed the Self-Certification. The overall goal of the Self-Certification process is to give Texas RE reasonable assurance that compliance obligations are being met to support the reliability of the Bulk Electric System. Reasonable assurance will be based upon the performance of the work completed by the entity, and the evidence submitted to the SEL to support the conclusions of the Self-Certification.

For additional information, go to Texas RE's Compliance page for instructions and the Align page for training and guidance.

Expectations for Self-Certification Activities
For Texas RE to have reliance on the conclusions submitted through the Self-Certification process, the entity must meet the following Self-Certification expectations:

Performance
Individuals performing the Self-Certification:
- Must possess the right skill sets to accurately understand the process they review.
- Must execute the Self-Certification tasks impartially.
- Shall provide the names of all individuals or subject matter experts involved.

Testing Approach
- Must follow any provided Texas RE testing guidance.
- Must answer the questions provided in Align.

Documentation

- Must follow any provided Texas RE documentation guidance for each of the NERC Reliability Standards in scope.
- Must provide documentation within the SEL to clearly demonstrate compliance.
- Must provide information regarding internal controls used to facilitate on-going compliance with the Requirements in scope.

Evidence Availability
- Shall provide all evidence to the SEL that was used to support the conclusions of each Requirement in scope.
- Shall include all testing documentation and supporting evidence to the SEL.
- The documentation and supporting evidence shall be provided as original, unredacted, and un-combined copies to the SEL.

Completing the Self-Certification Submittal to Texas RE via Align and the SEL
The entity is responsible for submitting evidence to the SEL and should follow all guidance for the evidence and retention including, but not limited to, the follow:
- Protect confidential information by documenting the status clearly on every page of the document. An example for critical energy infrastructure information would be marked "Confidential, CEII" in accordance with Section 1500 of the NERC Rules of Procedure.
- Avoid using filenames that may reveal critical aspects of their environment.
- Retain copies of all supporting documents and submitted evidence.
- Use unique file names for each evidence file submitted
- Certain files are not allowed in the SEL. (Please review the Registered Entity SEL Portal User Guide available on the Texas RE website.)
- A maximum single file size of 2 GB and multiple files uploaded in a single session, up to 10GB, is permitted.

Align Self-Certification Communication
- Request for Information (RFI) may be required.
- Compliance attestations for the Requirements included in the scope of the Self-Certification shall be submitted in Align by the date specified in the Self-Certification notification.

Texas RE may request additional information to verify compliance. Periodic communication regarding the status of the Self-Certification will continue until the entity is notified that the Self-Certification has been closed.