

Alberta Reliability Standards Self-Certification Guide

Date: October 30, 2013
Version: 2.1

Table of Contents

1	Introduction.....	1
1.0	BACKGROUND	1
1.1	PURPOSE OF THIS GUIDE.....	1
1.2	APPLICABILITY	1
2	About this Guide.....	2
2.0	SECTIONS.....	2
2.1	NAVIGATING THE ELECTRONIC VERSION	2
	Table of contents.....	2
	Underlined text	2
3	Procedures	3
3.0	SELF-CERTIFICATION OVERVIEW.....	3
3.1	SELF-CERTIFICATION PROCESS	3
	1. Understand the four basic steps of the self-certification process	3
	2. If required, request a change to the self-certification schedule	3
3.2	SELF-CERTIFICATION PROCESS TIMING.....	3
	1. Understand the process timelines.....	4
	2. Identify what cycle has been assigned to a registered market participant	4
	3. Attend the self-certification workshop	4
3.3	SELF-CERTIFICATION LETTER	4
	1. Obtain the latest version of the Self-certification Letter Template	4
	2. Complete the Self-certification Letter Template.....	5
	3. Submit the Self-Certification Letter Template	5
3.4	SELF-CERTIFICATION ASSESSMENT	5
	1. Understand the assessment	5
	2. Respond to a notification of deficiency	5
4	Guidelines	6
4.0	SELF-CERTIFICATION OVERVIEW.....	6
4.1	SELF-CERTIFICATION PROCESS	7
4.2	SELF-CERTIFICATION PROCESS TIMING.....	8
4.3	SELF-CERTIFICATION LETTER	10
4.4	SELF-CERTIFICATION ASSESSMENT	11
5	Related Documents and Revision History	13
5.0	RELATED DOCUMENTS	13
5.1	REVISION HISTORY	13

1 Introduction

1.0 BACKGROUND

The AESO is mandated to carry out compliance monitoring for Alberta Reliability Standards (ARS) under Section 23 of the Transmission Regulation. In alignment with ISO rule 103.12, the *Alberta Reliability Standards Compliance Monitoring Program (CMP)* was established, which defines more specific methods of monitoring compliance with reliability standards. Self-certification is one of the methods defined in the CMP.

This document is a guide only and may be revised as considered necessary by the AESO.

1.1 PURPOSE OF THIS GUIDE

The purpose of this document is to define the processes, procedures, timelines, and other details for self-certification.

The end goal is to establish a common understanding of the self-certification process, and to ensure that the implementation of the process is consistent, fair, and efficient.

1.2 APPLICABILITY

This guide applies to all registered market participants in the Alberta Reliability Standards Registry and to the AESO.

For the purpose of this guide, the term “compliance monitor” is applied as follows:

For the ISO, the compliance monitor is the Market Surveillance Administrator (MSA). For all other registered market participants, the compliance monitor is the AESO.

2 About this Guide

2.0 SECTIONS

This guide is divided into 5 sections:

Section 1: Introduction

Provides the background, purpose and applicability of this document.

Section 2: About this Guide (this section)

Provides information on how to use this document.

Section 3: Procedures

Provides information on what the registered market participant needs to do and what they can expect during the self-certification process. Subsections cover:

- 3.0 Self-certification overview
- 3.1 Self-certification process
- 3.2 Self-certification process timing
- 3.3 Self-certification letter
- 3.4 Self-certification assessment

Section 4: Guidelines

Provides information on the guidelines used to create the compliance monitoring self-certification processes.

Section 5: Related Documents and Revision History

Provides links to documents referenced in this document and the revision history

2.1 NAVIGATING THE ELECTRONIC VERSION

The electronic version of this guide contains useful navigation tools that can be used to find pertinent information without searching through each section.

Table of contents

The table of content shown prior to section 1 can be used as a means of navigating to any section or subsection in the guide.

To jump to a section or sub-section simply click on any line item in the table of contents.

Underlined text

Text that is underlined in blue is used to indicate a link to related topics within the guide or to documents on the internet

To use the link, click on the underlined text.

3 Procedures

The purpose of this section is to give registered market participants procedures related to the self-certification process.

3.0 SELF-CERTIFICATION OVERVIEW

The self-certification is a process for a registered market participant to determine and annually certify to the compliance monitor that it has met the requirements of each reliability standard applicable to its registered functional entities.

All registered market participants must annually complete the *ARS Self-certification Letter Template* and submit it to the compliance monitor for review.

3.1 SELF-CERTIFICATION PROCESS

The self-certification process takes place in four basic steps.

Procedures:

1. Understand the four basic steps of the self-certification process

The four basic steps to the self-certification process are:

- a. Based on the assigned cycle, the registered market participant receives the self-certification notice at least 60 days prior to the self-certification submittal deadline. (see section 3.2)
- b. The registered market participant completes the self-certification letter template. (see section 3.3)
- c. The registered market participant submits the completed *ARS Self-certification Letter Template* documents to the compliance monitor. (see section 3.3)
- d. The compliance monitor performs an assessment on the self-certification letter. (see section 3.4)

2. If required, request a change to the self-certification schedule

A registered market participant may request a change to their self-certification cycle 90 days prior to their initial cycle or 90 days prior to the requested self-certification cycle if it is for an earlier cycle. The request should be sent to rscompliance@aeso.ca and must detail the reasons for the change. The compliance monitor will evaluate the request and notify the registered market participant of the result within 30 days of the request.

3.2 SELF-CERTIFICATION PROCESS TIMING

The self-certification process follows strict schedules for notifications, self-certification periods, submissions, and assessments.

Procedures:

1. Understand the process timelines.

Each registered market participant is assigned a self-certification cycle. The table below shows the self-certification process timelines:

Cycle	Period	Notification Date No later than 60 days prior to the first day of the submittal period:	Submittal Period Anytime during the month of:	Due Date Last business day of:
Cycle 1	January 1 to December 31	November 1	January	January
Cycle 2	April 1 to March 31	February 1	April	April
Cycle 3	July 1 to June 30	May 1	July	July
Cycle 4	October 1 to September 30	August 1	October	October

- a. Period: Time period for which the registered market participant is self-certifying
- b. Notification Date: The date by which the registered market participant will receive self-certification notification.
- c. Submittal Period: The period when the registered market participant may submit the self-certification letter.
- d. Due Date: The absolute deadline date for submitting the self-certification letter.

2. Identify what cycle has been assigned to a registered market participant

The Alberta Reliability Standards compliance monitoring self-certification cycle assignment can be found on the AESO’s website under: Rules, Standards and Tariff > Compliance > Alberta Reliability Standards compliance > Self-Certification. To open the schedule, click [here](#) select Self-certification and then click on the Self-Certification schedule.

3. Attend the self-certification workshop

Currently, a quarterly self-certification workshop is offered to registered market participants that are scheduled for an upcoming self-certification cycle. An invitation will be sent to the registered market participant’s primary *Alberta Reliability Standard’s Compliance Monitoring Program (CMP)* contact person approximately at least one month prior to the workshop.

3.3 SELF-CERTIFICATION LETTER

A completed self-certification letter must be submitted by the registered market participant to the compliance monitor for self-certification. To ensure consistency of the information required, and to assist registered market participants in the self-certification process, the AESO develops, maintains and publishes the *ARS Self-certification Letter Template*.

Procedures:

1. Obtain the latest version of the Self-certification Letter Template

Always use the latest version of the *ARS Self-certification Letter Template*. Instructions on obtaining and using the *ARS Self-Certification Letter Template* are in the *ARS Self-Certification Letter Template Guide* which can be found on the AESO's website under: Rules, Standards and Tariff > Compliance > Alberta Reliability Standards compliance > Self-Certification. To download the template guide, click [here](#), select Self-certification then click on the Self-certification letter template guide.

2. Complete the Self-certification Letter Template

The registered market participant must use the template to create its self-certification letter. Complete the *ARS Self-certification Letter Template* as per instructions in the *ARS Self-certification Letter Template Guide* downloaded in the above procedure (Item 1).

3. Submit the Self-Certification Letter Template

The completed self-certification letter must be submitted within the prescribed timelines (see section 3.3) to the compliance monitor. Instructions on submitting the completed self-certification letter can be found in the *ARS Self-certification Letter Template Guide*.

The following documents must be completed and submitted for self-certification:

- a. Cover Letter (in both Excel and PDF format).
- b. Applicable Standards (in both Excel and PDF format).
- c. Officer's Certificate (in both Excel and PDF format).
- d. If required, a delegation of authority letter (when someone else other than the officer has signed the Officer's certificate).

3.4 SELF-CERTIFICATION ASSESSMENT

Once the self-certification letter has been received, the compliance monitor will perform an administrative and a technical assessment of the submission.

Procedures:

1. Understand the assessment

There are two steps in the assessment process:

- a. The administrative assessment which verifies that the submission is complete and correctly follows the process.
- b. The technical assessment which evaluates the compliance assessment provided in the self-certification letter.

2. Respond to a notification of deficiency

In case the administrative review of the self-certification letter determines that the letter is deficient, the registered market participant will be notified of the incompleteness and be given five business days to revise the submission. If the revised submission is deficient, the submission will be treated as a suspected non-compliance event. Failure to revise a submission will be treated as suspected non-compliance.

The technical assessment described in 1b above is only conducted on administratively compliant submissions of the self-certification letter.

4 Guidelines

The purpose of this section is to give registered market participants information on the guidelines related to the self-certification process. Procedures related to the guidelines are given in section 3.

4.0 SELF-CERTIFICATION OVERVIEW

Self-certification is a process for a registered market participant to determine and certify to the compliance monitor that it has met the requirements of each reliability standard applicable to its registered functional entities.

It is defined under the *Compliance Monitoring Program* as “a letter of certification provided by a market participant to the Compliance Monitoring Authority to certify that the market participant complies with applicable reliability standards requirements pertaining to their function for that year or period and, if not compliant, to provide disclosure of instances of non-compliance”

This process replaces the need for more frequent audits of the registered market participant.

The highlights of the process are presented below:

- a. The compliance monitor establishes an annual self-certification schedule by assigning each registered market participant in one of the self-certification schedule's cycles.
- b. The registered market participant self-certifies for a period determined by the assigned cycle's self-certification period, unless otherwise directed by the compliance monitor.
- c. The registered market participant's self-certification letter must contain a compliance assessment of each reliability standards requirement pertaining to its functional entities for the self-certification period.
- d. The compliance assessment reported in the self-certification letter should be supported and based on registered market participant's internal compliance checks and evidence.
- e. The self-certification letter must be submitted to the compliance monitor following the processes and using the template presented in this guide and must include the signature of an Officer of the registered market participant's corporation.
- f. The evidence supporting the self-certification evaluation should not be submitted as part of the self-certification letter, but be retained and provided to the compliance monitor when requested.
- g. The registered market participant should retain and have ready the evidence used in the assessment of the self-certification period.
- h. The compliance monitor reviews the self-certification letter.
- i. Failure to submit a complete, accurate, and true self-certification letter results in the registered market participant being evaluated as non-compliant with all standards applicable to its functional entities for the self-certification period.

- j. Failure to submit the self-certification letter on time results in the registered market participant being evaluated as non-compliant with all reliability standards applicable to its functional entities for the entire self-certification period.
- k. Any non-compliance with applicable reliability standards identified during the self-certification process is referred by the compliance monitor to the Compliance Enforcement Authority.
- l. The compliance monitor notifies the pertinent registered market participant when a referral of a non-compliance event is made to the Compliance Enforcement Authority.
- m. The self-certification letter may be used as evidence in other compliance activities, including audits and referrals.

The self-certification processes and their associated documents and timelines are detailed in the following sections.

4.1 SELF-CERTIFICATION PROCESS

The self-certification process takes place in four basic steps, the first one being the notification submitted by the compliance monitor to the registered market participant to self-certify. The registered market participant completes the self-certification letter and submits the letter to the compliance monitor. In the end, the compliance monitor performs an assessment of the self-certification letter.

The self-certification steps are detailed in the following sections.

1. Notification of Self-Certification

The compliance monitor notifies the registered market participant to self-certify. The notification specifies the self-certification period and the timelines for the submission of the self-certification letter.

The notification is sent by email to both the primary and alternate compliance contacts provided in the Registration form.

2. Completion of the Self-Certification Letter

The registered market participant must use the version of *ARS self-certification Letter Template* in effect as of the first day of the submittal period. Older versions of the templates may not accurately reference the standards that the registered market participant is required to self-certify for.

The most updated version of the template can be downloaded from the Compliance section of the AESO website.

3. Preparation for Self-Certification

The self-certification letter should be based on evidence of compliance with the reliability standards. The registered market participant is responsible for the collection and assessment of this evidence.

The extent of preparation for self-certification is the responsibility of each registered market participant. The development of an internal compliance process, which institutes formal processes and controls, has been established as a best practice in the industry.

4. Submittal of the Self-Certification Letter

The letter must be submitted to the compliance monitor in both, Portable Document Format (PDF) and Excel format (XLS or XLSX).

The timelines of the submittal process are defined in the “Self-Certification Process Timing” – Section 4.2 of this guide.

5. Retraction Process

The registered market participant can retract the self-certification letter in the case that information in error has been included in the letter. The retraction process is subject to the following:

- a. Only one retraction per a self-certification cycle is permitted;
- b. The retraction must be requested during the self-certification submittal period;
- c. The retraction cannot be made after the compliance monitor has issued a notification of administrative deficiency.

The retraction request must be made via an email to rscompliance@aeso.ca, specifying the self-certification letter identification.

The revised self-certification letter must follow the exact submission process and timelines as the initial self-certification letter. No extension to the submittal timelines is allowed for resubmission.

Failure to submit a revised self-certification letter is treated as a suspected non-compliance event.

4.2 SELF-CERTIFICATION PROCESS TIMING

The self-certification process follows strict schedules for notifications, self-certification periods, submissions, and assessments. The details of the timelines defined for this process are presented in the following paragraphs.

1. Self-certification cycle

A self-certification cycle is one of the four cycles of an annual self-certification schedule, for which a self-certification period, a notification date, a submittal period, and a due date have been defined.

The table shown below presents the self-certification schedule’s timelines for a generic year.

Cycle	Period	Notification Date No later than 60 days prior to the first day of the submittal period:	Submittal Period Anytime during the month of:	Due Date Last business day of:
Cycle 1	January 1 to December 31	November 1	January	January
Cycle 2	April 1 to March 31	February 1	April	April
Cycle 3	July 1 to June 30	May 1	July	July
Cycle 4	October 1 to September 30	August 1	October	October

2. Self-Certification Schedule

The compliance monitor establishes an annual self-certification schedule by assigning each registered market participant to one of the four self-certification cycles.

Once initially assigned to a self-certification cycle, the registered market participant self-certifies in this cycle for the upcoming years.

The annual self-certification schedule is posted under the Compliance section of the AESO website by the end of the previous calendar year. The publishing of the initial annual self-certification schedule, and of any subsequent revisions of it, is announced by the compliance monitor through the following channels:

- a. A notification inserted under the Compliance section of the AESO bi-weekly stakeholder newsletter, and
- b. A notification submitted via email to the primary and alternate compliance contacts provided in the Registration form.

3. Change of the Self-Certification Cycle

In special situations, the registered market participant may submit to the compliance monitor an application to request to self-certify in a different cycle than the one in which it has been initially assigned.

In order to evaluate the application, the compliance monitor must receive the application 90 days prior to:

- a. The requested self-certification cycle if their request is for an earlier cycle, or
- b. The initially assigned self-certification cycle if their request is for a later cycle.

The application should be submitted via email to rscompliance@aeso.ca and should detail the reasons why the registered market participant is requesting to self-certify in a different cycle.

In the application evaluation process, the compliance monitor makes its best effort to accommodate the change. Due consideration is given to:

- a. Each registered market participant application in conjunction with those of the other registered market participants, and
- b. Balancing the workload through each of the self-certification cycles at the compliance monitor.

The compliance monitor notifies the registered market participant about the resolution of the application within 30 days of its receipt. The notification is sent via email submitted from rscompliance@aeso.ca.

A registered market participant, whose request is approved, self-certifies from the last day of its previous self-certification.

In case the application is declined, the registered market participant must provide the self-certification letter as per the assigned self-certification cycle's timelines.

4. Self-Certification Notification

The compliance monitor notifies the registered market participant to complete a self-certification letter 60 days prior to the first day of the self-certification cycle's submittal period, unless specified otherwise by the reliability standard.

5. Self-Certification Letter Submittal

The self-certification letter must be submitted to and received by the AESO in accordance with the self-certification cycle's submittal period and no later than the cycle's self-certification due date of the registered market participant's assigned cycle.

6. Self-Certification Letter Assessment

The compliance monitor performs an assessment of the self-certification letter. The assessment timelines are defined by the ISO rule 103.12.

4.3 SELF-CERTIFICATION LETTER

The registered market participant must use the version of *ARS self-certification Letter Template* in effect as of the first day of the submittal period. For procedures related to completing the self-certification template, please refer to the *ARS Self-Certification Letter Template Guide* which can be found on the AESO's website under: Rules, Standards and Tariff > Compliance > Alberta Reliability Standards compliance > Self-Certification. To download the template guide, click [here](#) to access the page and then click on the template guide. The actual template can be found on select Self-certification then click on the Self-certification letter template guide. The template is on the same page.

The template is an Excel (xls) document which incorporates four worksheets identified as forms. The forms and a high level of their functionalities are presented below:

- a. The "Cover Sheet" form records the contact information, the self-certification period, and the registered functional entities. It allows the identification of the applicable reliability standards and requirements based on the selection of the registered functional entities and the self-certification period.
- b. The "Applicable Standards" form lists all requirements of the reliability standards applicable to the registered market participant. The compliance assessment and, when applicable, the violation type source are recorded in this form.
- c. The "Officer's Certificate" form is a letter which must be signed by an Officer, to confirm that the registered market participant is familiar with the self-certification process, and has undertaken a process of analysis and assessment to determine its compliance with all reliability standards applicable to its registered functional entities.
- d. The "Master Standards" form lists all approved reliability standards, and their applicable functional entities and effective periods.

The compliance monitor publishes a new version of the template a maximum of five days after the approval of a new standard or a new version of a standard by the Alberta Utilities Commission.

The compliance monitor announces the posting of a new version of the template a maximum of ten days from the date of publishing, through the following channels:

- a. A notification inserted under the Compliance section of the AESO weekly stakeholder newsletter¹, and
- b. A notification submitted via email to the primary and alternate compliance contacts provided in the Registration form.

The completed Cover form, Applicable Standards form, and Officer's Certificate form, plus any additional/supportive information or documentation deemed as necessary must be submitted by the registered market participant to the compliance monitor as the self-certification letter.

¹ To receive the letter follow the process described at <http://www.aeso.ca/ourcompany/11901.html>

The letter must include a compliance assessment of all effective reliability standards requirements pertaining to its registered functional entities during the self-certification period.

4.4 SELF-CERTIFICATION ASSESSMENT

The compliance monitor conducts an assessment of the self-certification letter to determine compliance with the reliability standards. This process consists of two steps, the administrative assessment and the technical assessment.

1. Administrative Assessment

The administrative assessment verifies if the submission is complete and correctly follows the process.

The focus of this evaluation is to ensure that the registered market participant self-certifies for all reliability standards requirements applicable to its registered functional entities for the self-certification period.

The administrative assessment includes, but it is not limited to, the checking of:

- a. The submission of the mandatory forms, and
- b. The completeness of the information provided in the letter such as legal name, contact name, functional entities selection, officer information, and officer signature.

2. Deficient Submittals

In case the administrative review of the self-certification letter determines that the letter is deficient, the compliance monitor notifies the registered market participant that the submission is administratively deficient.

The notification is submitted via an email from rscompliance@aeso.ca to the primary and secondary compliance contacts provided in the registration form and to the contact person provided in the self-certification letter. The notification identifies the self-certification letter and presents the specific areas of deficiency.

The registered market participant has five business days from the day of compliance monitor's notification, to submit a revised self-certification letter.

If the revised self-certification letter is deficient, the registered market participant is notified through the same process as above that the submission will be treated as a suspected non-compliance event. Failure to submit the revised self-certification letter will also be treated as suspected non-compliance.

3. Technical Assessment

The compliance monitor conducts a technical assessment, to evaluate the compliance assessment provided in the self-certification letter, and when appropriate, to follow up on all non-compliance certifications.

The technical assessment is only conducted on administratively compliant submissions of the self-certification letter.

The compliance monitor may require that the registered market participant provide the evidence used in its self-certification or any additional data, information, or evidence necessary to assess the compliance status provided in the self-certification letter.

The data, information, and evidence requests are made following the process defined in the ISO rule 103.12 and the *Compliance Monitoring Program*.

4. Referral

All suspected non-compliance events identified during the administrative or technical assessments of the self-certification letter is referred by the compliance monitor to the Compliance Enforcement Authority.

The compliance monitor notifies the registered market participant when a suspected non-compliance event is identified during the self-certification process and is referred to the Compliance Enforcement Authority.

The referral process follows the steps and deadlines defined in ISO rule 103.12.

5 Related Documents and Revision History

5.0 RELATED DOCUMENTS

Documents referenced in this guide can be found by clicking on the following website page links:

[Alberta Reliability Standards Compliance Monitoring Program](#)

[Alberta Reliability Standards Self-Certification Letter Template Guide](#)

[Consolidated Authoritative Document Glossary](#)

5.1 REVISION HISTORY

This document is a compliance monitor information document and guide, and not a compliance monitor authoritative document. Revisions to this document may be made from time to time by the AESO Compliance group. Registered market participants will be notified of revisions through the AESO Stakeholder Newsletter.

Revision	Date	Comments
1.0	December 1, 2009	Initial version of the Self-Certification Guideline
2.0	December 18, 2012	Updated to incorporate major revisions of the template
2.1	October 30, 2013	Updated ISO Rule 12 references