



Alberta Electric System Operator

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Alberta Risk-Based Compliance Monitoring Program

Self-Certification Process

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1. Introduction

The Alberta Risk-Based Compliance Monitoring Program (ARCMP)¹ describes self-certification of market participants² (entity) as one of the integral tools that the AESO uses to monitor compliance with reliability standards³ (Alberta Reliability Standards or ARS).

Self-certification is a systematic risk-based process conducted by the AESO in coordination and collaboration with the entity. The objective of self-certification is for the AESO to review the entity's self-certification submission and assess and measure the entity's evidence (if applicable) to gain reasonable assurance of compliance with applicable ARS. If the AESO suspects that an entity has contravened an ARS, it must refer the matter to the Market Surveillance Administrator (MSA)⁴.

Self-certification provides assurance that entities are complying with ARS requirements and encourages entities to implement and maintain a robust internal compliance program that includes periodic reviews of ARS compliance obligations and mechanisms to internally detect and correct non-compliance.

Self-certification is also an opportunity for the AESO and the entity to develop and maintain effective relationships and demonstrate cooperation and commitment that directly supports the reliability and security of the interconnected electric system⁵ (IES), confirms areas of strength, identifies best practices, and identifies concerns and/or opportunities for enhancements that will lead to continuous improvement of entity internal compliance programs and ARS compliance outcomes in Alberta.

The AESO conducts self-certification of entities in a manner that promotes transparency, independence, fairness, objectivity, consistency, confidentiality⁶, and efficiency.

2. Purpose

The AESO has established this document as a companion document to the ARCMP, and in accordance with *Transmission Regulation*, Section 23(1)(b) and Section 103.12 of the ISO rules, *Compliance Monitoring*. It defines the process for self-certification with and without evidence.

3. Applicability

This document is applicable to the AESO and entities involved in an ARS self-certification.

4. ARS Compliance Portal

To ensure efficiency, consistency, secure transfer of information, and to assist entities in the self-certification process, the AESO has developed the Self-Certification Application within the [ARS Compliance Portal](#). All entities must complete self-certification through the ARS Compliance Portal and must follow the instructions in the [ARS Portal User Guide](#).

The AESO grants access to the ARS Compliance Portal for the individuals identified by the entity as fulfilling the following roles:

¹ [AESO Website, ARS Compliance Monitoring](#)

² As defined by the *Electric Utilities Act*, SA 2003, c E-5.1

³ As defined by the *Transmission Regulation*, AR 86/2007, s. 19

⁴ Pursuant to the *Electric Utilities Act*, Section 21.1

⁵ As defined by the *Electric Utilities Act*, SA 2003, c E-5.1

⁶ Pursuant to Section 103.12 of the ISO rules, *Compliance Monitoring* and Section 103.1 of the ISO rules, *Confidentiality*

- Primary compliance contact
- Alternate compliance contact
- Authorizing officer

Information regarding the ARS Compliance Portal sign-up process is in the ARS Compliance Portal User Guide.

5. Self-Certification Types

Self-certification is a monitoring tool listed in the ARCMP. The self-certification process leverages concepts from the North American Electric Reliability Corporation's (NERC) Enterprise Reliability Organization (ERO) Compliance Monitoring and Enforcement Program (CMEP) as well as the AESO's historical self-certification process, with the objectives of minimizing administrative burden and optimizing resource utilization for stakeholders and the AESO.

Self-certification is divided into two categories:

5.1 Self-Certification (without evidence)

Self-certification without evidence requires the entity to declare its compliance status to the AESO for ARS in scope of the self-certification. The AESO provides the scope of the self-certification to the entity in the self-certification notification.

5.2 Self-Certification (with evidence)

Self-certification with evidence requires the entity to declare its compliance status to the AESO for ARS in scope of self-certification and submit evidence to support the compliance status(es) it has declared. The AESO determines which ARS requirements the entity must self-certify with evidence for and provides the information to the entity in the self-certification notification.

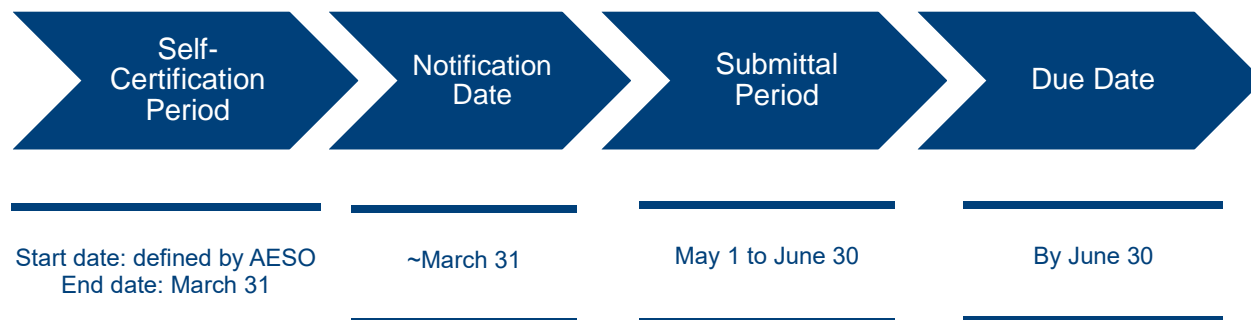
6. Self-Certification Schedule

The AESO requires an entity to self-certify on a schedule in accordance with its Compliance Oversight Plan (COP). The AESO provides a preliminary monitoring schedule to an entity as part of the COP process that indicates what monitoring tools apply to it for the next three calendar years, including whether self-certification (with or without evidence) is required in that timeframe. Changes to the AESO's self-certification schedule may occur at any time due to factors including, but not limited to, identification or changes of emerging or escalated risks, changes to the entity population, changes to an entity's COP, AESO resource availability, or if the AESO approves a self-certification schedule change request from an entity.

6.1 Self-Certification Timelines

The AESO sends a self-certification notification to the entity required to self-certify in that specific year on or before March 31. The entity must complete self-certification by June 30. The AESO defines the self-certification period start date in the self-certification notification. The self-certification period end date is March 31 of that year. Figure 1 below illustrates the timeline of self-certification.

Figure 1: Self-Certification Timeline



1. Self-Certification Period: the period for which the entity must self-certify.
2. Notification Date: the date the AESO provides the entity its self-certification notification.
3. Submittal Period: the period the entity may submit self-certification and (if applicable) evidence.
4. Due Date: the final date the entity must submit self-certification and (if applicable) evidence.

6.2 Preliminary Three-Year Monitoring Schedule in COP

The AESO provides an entity's preliminary three-year monitoring schedule as part of the COP process. An update to the entity's COP may trigger a change to the entity's preliminary three-year monitoring schedule. At least once per year, the AESO updates the entity's preliminary monitoring schedule component of its COP to ensure that it is aware of planned monitoring activities for the next three years.

The AESO's preliminary three-year monitoring schedule may change at any time. The AESO notifies affected entities of any changes. The AESO refines its monitoring schedule on an annual basis and determines its annual schedule for the upcoming calendar year.

6.3 Annual Schedule

Before the end of each calendar year, the AESO posts its self-certification schedule for the subsequent year on its website⁷. The AESO may make a change to the annual self-certification schedule at any time. The AESO notifies an affected entity if it is impacted by a change to the schedule and updates the annual self-certification schedule posted on its website.

6.4 Requests to Extend, Change, Delay or AESO Cancellation

Self-certification submission extension

An entity may request an extension to its self-certification submission due date by sending a request to the rscompliance@aeso.ca up to five business days prior to the submittal period start date. The AESO evaluates the request and notifies the entity of the result within five business days of receiving the request.

⁷ [AESO Website, ARS Compliance Monitoring](#)

Self-certification schedule change or delay request

An entity may request a change or delay to its self-certification schedule under extenuating circumstances for the following reasons:

- a. The self-certification schedule conflicts with other critical business activities of the entity;
- b. The entity is responding to an event or exceptional circumstance (e.g., CIP exceptional circumstance, operating emergency, business continuity plan activation, recovery, etc.).

An entity submits its request to rscompliance@aeso.ca that describes the extenuating circumstances. The AESO considers the entity's request on a case-by-case basis and, if necessary, works with the entity to reschedule the self-certification.

AESO cancellation

The AESO provides notification to an entity if it, at its discretion, changes or cancels a self-certification.

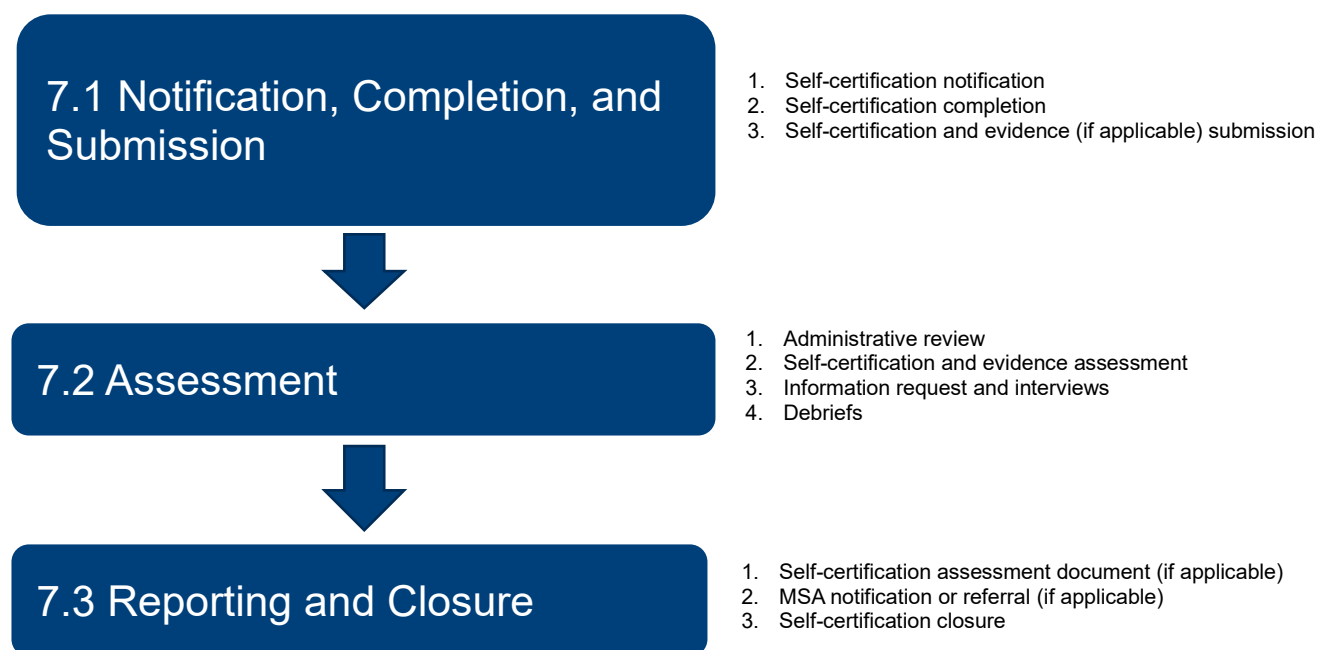
6.5 Self-Certification Workshop

The AESO offers two self-certification workshop sessions each year to entities that are scheduled for self-certification. The AESO sends an invitation to the entity's primary and secondary compliance contacts at least one month prior to the self-certification notification date.

7. Self-Certification Process

The self-certification process consists of three phases. Figure 2 below illustrates the three phases and includes the corresponding section number of the process below.

Figure 2: Self-Certification Phases



7.1 Self-Certification Notification, Completion, and Submission

The Self-Certification Notification, Completion, and Submission phase consists of three steps. Figure 3 illustrates the three steps in this phase.

Figure 3: Self-Certification Notification, Completion, and Submission Steps



7.1.1 Self-Certification Notification

The AESO sends the self-certification notification to the entity's primary and secondary compliance contact person at least 90 days prior to the end of the submission period⁸. The notification includes the self-certification scope, self-certification period start and end dates, submission timelines, and the list of ARS requirements that the entity must submit evidence for (if applicable).

For self-certification with evidence, the self-certification notification also includes an evidence information request and evidence submission instructions including the required structure to organize the information.

7.1.2 Self-Certification Completion

The AESO opens the Self-Certification Application for the entity to complete its self-certification beginning May 1 and closes it on June 30 (i.e., the submittal period). The entity uses the ARS Compliance Portal to complete its self-certification following the instructions in the ARS Portal User Guide.

The entity should base its self-certification submission on its internal due diligence and review of evidence to support the compliance statuses it declares for each in scope ARS. The entity is responsible for the collection and assessment of this evidence to support its self-certification submission and declaration of its compliance status. The entity must declare one of the following statuses for each ARS requirement in scope of self-certification:

- **Compliant for Entire Period - Yes:** Entity declares itself to be fully compliant for the entirety of the applicable self-certification period.
- **Compliant for Entire Period – No:** Entity declares itself to be non-compliant for a portion of the self-certification period. The entity must provide start and end dates for the non-compliance and indicate if it self-reported to the MSA.

⁸ Self-certification period end date is March 31 each year

The entity must provide an explanation to the AESO in its self-certification submission if it considers an in scope ARS requirement as not applicable during the entirety or a portion of the self-certification period. Refer to the ARS Portal User Guide for instructions.

7.1.3 Self-Certification and Evidence Submission

7.1.3.1 Self-Certification (without evidence)

The entity submits its completed self-certification in the Self-Certification Application in the ARS Compliance Portal, on or before the last day of the submittal period.

7.1.3.2 Self-Certification (with evidence)

The entity submits its completed self-certification in the Self-Certification Application in the ARS Compliance Portal, on or before the last day of the submittal period. In addition, the entity submits the information and evidence for each ARS requirement indicated as in scope of self-certification with evidence in the self-certification notification. The entity cannot complete the self-certification within the ARS portal unless it submits the evidence for the ARS requirement(s) in scope of self-certification with evidence.

RSAWs

The entity completes and submits RSAWs⁹ for the ARS in scope of self-certification with evidence. The entity uploads the completed RSAWs to the ARS Compliance Portal by opening a Communication Channel within its self-certification.

The RSAW is an important document used in the self-certification with evidence process wherein the entity documents:

- a clear, concise, and accurate narrative that explains how it complied with applicable ARS requirements including references to the relevant policies, processes, or procedures implemented to ensure compliance;
- a list/index of the evidence provided, a description of each evidence file, its relevance, how it relates to an entity's processes (e.g. input or output), and how it demonstrates compliance;
- specific details and pointers to locations within the evidence that demonstrate compliance such as page number, paragraph, or data point(s).

Alberta Evidence Request Tool (ALBERT)¹⁰

Dependent on which ARS requirement(s) require evidence for self-certification, the AESO may require that the entity complete and submit the ALBERT. The AESO indicates if the entity is required to complete the ALBERT as part of self-certification with evidence in the self-certification notification.

The ALBERT is a tool that increases transparency, consistency, and efficiency in the self-certification process. The ALBERT provides an entity with detailed information that supports its understanding of what evidence the AESO requests in the self-certification process for specific ARS requirements. It provides information about the data the AESO requires to initially sample evidence effectively and efficiently and supports the entity in understanding the AESO's sampling process it uses to gain reasonable assurance of compliance. It is critical that the entity provides complete and

⁹ [AESO Website, ARS Compliance Monitoring, Reliability Standard Audit Worksheets Heading](#)

¹⁰ [AESO Website, ARS Compliance Monitoring](#)

accurate data in the ALBERT to ensure that the audit and self-certification is effective and efficient. The entity should follow the instructions carefully as it completes the ALBERT. The entity should contact the AESO at any time during the self-certification process if it has questions or would like clarification about how to complete the ALBERT.

An entity may find it beneficial to use the ALBERT in its ongoing internal compliance processes, which could increase the efficiency of preparing for a self-certification. Please contact the AESO at rscompliance@aeso.ca to learn more about how to use and complete the ALBERT.

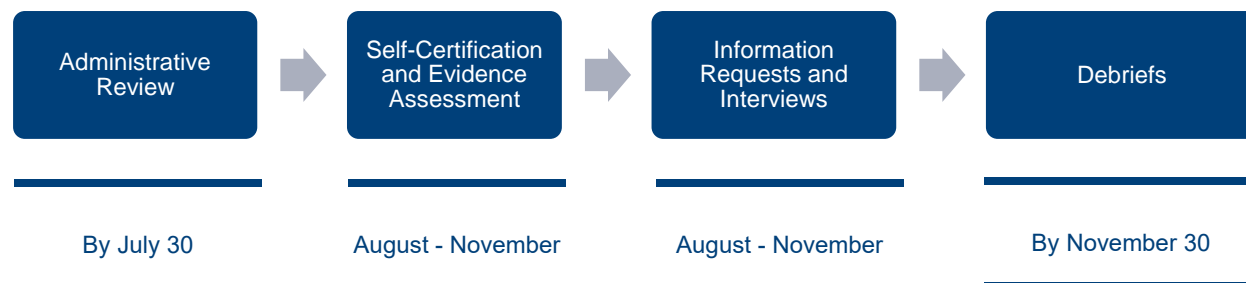
Evidence Quality

The entity's evidence should be complete, organized, relevant, clearly demonstrates compliance, and needs to align with and match the information the entity provided in the RSAWs and/or ALBERT, including, but not limited to, file names and page numbers. The AESO provides instructions and expectations related to evidence submission as part of the self-certification notification. The entity cannot complete the self-certification within the ARS portal unless it submits the required evidence.

7.2 Self-Certification Assessment

The AESO completes an assessment of the entity's self-certification submission. For both self-certification with and without evidence, the AESO may request additional information from the entity. The self-certification assessment phase consists of four steps. Figure 4 illustrates the four steps involved in this phase.

Figure 4: Self-Certification Assessment Steps



7.2.1 Administrative Review

The AESO conducts an administrative review to confirm the self-certification submission and evidence submission (if applicable) is complete, and that the entity has followed the self-certification process. The AESO notifies the entity in the ARS Compliance Portal once its administrative review is complete and if the entity's self-certification and/or evidence submission is incomplete. The AESO provides the entity five business days to revise the submission and address deficiencies.

7.2.2 Self-Certification and Evidence Assessment

The AESO reviews the entity's self-certification submission.

For ARS requirement(s) in scope of self-certification with evidence, the AESO reviews the evidence using the compliance assessment approach stated in the RSAW. RSAWs provide the AESO and the entity guidance on the objective and the method of the AESO's compliance assessment approach. However, the RSAW is not an authoritative document and the AESO's self-certification objective is to gain reasonable assurance that the entity is compliant with the language of the ARS

requirement(s).

If the AESO assesses the entity's self-certification submission and/or evidence is insufficient, unclear, incomplete or does not appear to demonstrate compliance with the ARS, the AESO may send the entity an Information Request(s) or hold interviews (see section 7.2.3).

The AESO documents its compliance assessment in the auditor notes section of the RSAW and retains it in the AESO's records to support the self-certification with evidence assessment.

7.2.3 Information Request(s) and Interviews

The AESO's assessment may include one or a combination of the following methods to obtain reasonable assurance of compliance:

7.2.3.1 Information Request(s)

The AESO may request additional information, sampling, and/or evidence from the entity to establish that the entity demonstrates compliance. The AESO sends this in the form of an Information Request (IR) document. To ensure the self-certification process is efficient and to mitigate the risk of schedule impacts and undue administrative burden, the AESO may provide a due date between 5 to 15 business days depending on the nature of the IR. The entity should contact the AESO as soon as possible if it has questions about the IR and it needs clarification.

If the IR requires significant effort and the entity is unable to meet the due date documented in the IR, the entity must inform the AESO as soon as possible to propose an alternate due date. The AESO considers the request and, if necessary, works with the entity to agree on a reasonable alternate due date while ensuring that the self-certification schedule is not materially impacted.

If the entity is unable to provide the AESO with the additional information requested within the agreed upon timeframe or the additional information does not adequately demonstrate compliance, the AESO bases its assessment on the evidence the entity has provided which may result in a suspected contravention.

7.2.3.2 Interviews

The AESO may conduct interviews with the entity's compliance contact(s) and applicable subject matter experts (SME). The AESO may hold interviews remotely via video conference or in-person. The AESO works with the entity to schedule interviews during self-certification and issues an IR for each interview that documents the requested date, time, and location of the interview. The entity responds to the IR after each interview concludes with the list of entity interview participants who attended.

Interviews are a valuable tool that benefit both the AESO in its objective of efficiently obtaining reasonable assurance of compliance and the entity in its objective of demonstrating compliance and showcasing its compliance culture. Interviews complement and augment the evidence assessment process and can significantly increase the efficiency of self-certification as the AESO and entity collaborate effectively, quickly ask and answer questions, gain clarification, directly observe a process/tool/internal control, and verify the AESO's understanding of the entity's evidence to support the AESO's self-certification assessment. Common interview topics are, but not limited to:

- the entity's policies, processes, and procedures that are relevant to the ARS requirement(s) in scope of the self-certification;

- training programs and competencies of the individuals implementing or accountable for the applicable processes, including SMEs or entity compliance contacts;
- how the entity identifies issues or internal control/process/procedure failures and what detection, escalation, and mitigation processes exist;
- incomplete evidence or discrepancies identified in the evidence; and
- potential issues that could lead to a suspected contravention or area of concern, to ensure the AESO and entity have an opportunity to discuss before the reporting and closure phase.

The AESO provides the entity the ability for its individuals participating in the interview to quickly confer on an answer to ensure accuracy or validate information before responding to a question. At the entity's request, the AESO may leave the interview while the entity interview participants confer.

During the interview, the AESO may identify that it requires additional information or evidence to support its compliance assessment. The AESO informs the entity during the interview that it will send a follow up IR and the AESO and entity may agree on a reasonable IR due date at that time. The AESO sends the IR to the entity following the interview and includes references to the interview and the agreed upon due date.

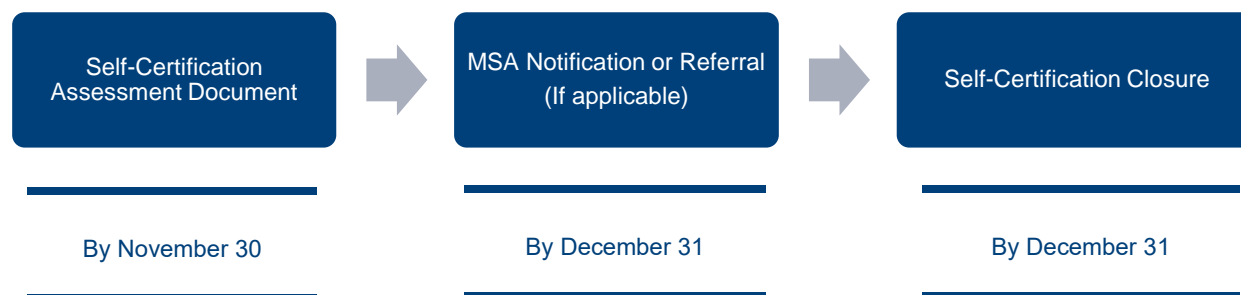
The AESO documents the interview conversations in the form of notes and retains them in its working papers to document the self-certification assessment process. The AESO does not rely solely on interviews to support findings and conclusions. As indicated above, the AESO may identify relevant and/or additional information during an interview that supports its understanding of the evidence the entity has provided or evidence that the AESO may request in a follow up IR. The entity may take notes during the interview conversations for its own records.

7.2.4 Debriefs

The AESO conducts debriefs at its discretion but at a reasonable frequency during the assessment phase to indicate progress, work completed, open items, remaining activities to be completed, and to discuss potential suspected contraventions or observations. Where the AESO identifies a potential suspected contravention or observation during its assessment, the AESO arranges a debrief meeting with the entity. Through effective communication and collaboration, the debrief meeting provides the AESO and entity an opportunity to ask and answer questions and verify the accuracy of the AESO's assessment and to discuss the AESO's observations (positive and/or potential areas for improvement). The entity may highlight evidence previously submitted to the AESO which does not appear to have reviewed or considered or discuss the AESO's interpretation of an ARS to gain understanding. This may lead to additional IRs or assessment, as required.

7.3 Self-Certification Closure

The self-certification closure phase consists of three steps. Figure 3 illustrates the three steps involved in this phase.

Figure 3: Self-Certification Closure Phase

7.3.1 Self-Certification Assessment Document

The AESO provides the entity with a self-certification assessment document if it identifies any suspected contraventions. If the AESO's assessment does not result in the identification of any suspected contraventions, the AESO closes the entity's self-certification (see section 7.3.3) without providing an assessment document.

7.3.1.1 Draft Self-Certification Assessment Document

If the AESO identifies any suspected contraventions, it provides the entity a draft self-certification assessment document, which includes a description of the suspected contravention(s). The entity will have an opportunity to provide comments on the draft self-certification assessment document related to inaccuracies, factual and technical errors, and omissions.

7.3.1.2 Draft Self-Certification Assessment Document Comments

The entity provides draft self-certification assessment document comments related to inaccuracies, factual and technical errors, and omissions to the AESO within 10 business days.

The AESO provides a comment form for the entity to complete and submit. The AESO reviews all entity comments and if necessary, updates the self-certification assessment document to correct inaccuracies, factual and technical errors, and omissions accordingly before finalizing it. If the entity has no comments to provide the AESO or does not submit comments within 10 business days, the AESO finalizes the self-certification assessment document.

The AESO does not accept additional information or evidence during this step.

7.3.1.3 Final Self-Certification Assessment

The AESO issues the final self-certification assessment document to the entity within 10 business days of receiving the entity's draft self-certification assessment document comments, or if the entity does not provide the AESO with comments within 10 business days.

7.3.2 MSA Notification or Referral

7.3.2.1 MSA Notification

If the entity self-certified without evidence as Non-Compliant and indicates that it has **not** self-reported to the MSA, the AESO notifies the MSA within 30 days of receiving the entity's self-certification.

7.3.2.2 MSA Referral

If the AESO's final self-certification assessment document includes any suspected contravention(s), the document includes notification to the entity that the AESO refers the matter to the MSA.

The AESO provides a copy of the final self-certification assessment document and the referral to the MSA that includes the details related to the suspected contravention(s). The AESO issues a referral to the MSA on a confidential basis and includes confidential information obtained during self-certification¹¹.

7.3.3 Self-Certification Closure

Once the AESO's assessment is complete, the AESO closes the self-certification in the ARS Compliance Portal. The AESO moves the entity's self-certification to the deactivated view in the ARS Compliance Portal and the entity views the self-certification status in the ARS Compliance Portal including the closed status. The entity uses the ZIP function within the ARS Compliance Portal to download the self-certification package upon self-certification closure. The entity download must occur within 60 days of the self-certification closure. The AESO deletes the self-certification information within the ARS Compliance Portal after 60 days of self-certification closure.

8. Confidentiality and Retention

8.1 Confidentiality

The AESO conducts self-certification of entities on a confidential basis Pursuant to Section 103.1 of the ISO Rules, *Confidentiality* and Section 103.12 of the ISO rules, *Compliance Monitoring* (Section 103.12) including all information and evidence submitted by an entity to the AESO. Pursuant to subsection 6 of Section 103.12, the AESO may make information obtained during applicable compliance monitoring available to either or both the Alberta Utilities Commission (AUC) or the MSA.

8.2 Retention

The AESO is required to establish a Records Management Program in accordance with policies, standards and procedures established by the Minister of Service Alberta pursuant to Section 4(2) of the *Records Management Regulation*, and in accordance with its Records Management Policy.

Information and data generated and received related to self-certification may be retained for a maximum of 10 years unless a different retention period is specified in an ARS or by an applicable regulatory entity. This is consistent with AESO's Records Management Policy and applicable legislation.

9. Escalation Process

The AESO's External Compliance Monitoring – ARS team is responsible for executing and facilitating the self-certification process with the entity in a professional and collaborative manner, and for executing self-certification decision making including determining assessment conclusions. If an entity identifies issues or concerns related to the execution of the self-certification process (e.g., unreasonable scheduling delays caused by the AESO, insufficient communication or transparency in the self-certification process or assessment conclusions, perceived or actual conflict of interest, etc.), it must communicate its concerns in writing to the primary AESO contact working on the entity's self-certification at rscompliance@aeso.ca The Manager, External Compliance

¹¹ Pursuant to Section 21.1, *Electric Utilities Act*

Monitoring – ARS evaluates the concerns and works with the entity to resolve the complaint. If the issues or concerns are not resolved satisfactorily through effective collaboration with the Manager, External Compliance Monitoring – ARS, an entity may contact the Director, Compliance to initiate the following escalation process:

- The entity submits its concerns in writing to the Director, Compliance within five business days after the final discussion with the Manager, External Compliance Monitoring – ARS.
- The entity submission must include the rationale for the disagreement and any proposed solutions and/or mitigations, if applicable.
- The Director, Compliance works collaboratively with the entity to understand its concerns and determines merit regarding the disagreement.
- The Director, Compliance responds to the entity in writing within 10 business days of receiving the entity's submission that includes a determination on merit, summary of the outcome, and mitigation actions agreed upon between the AESO and the entity.
- If the entity's concerns are not satisfactorily addressed after these steps are completed, it may pursue its concerns further by escalating the matter to the Vice President, Finance. The Vice President, Finance works with the entity and the AESO Compliance Department to collaboratively resolve the concerns and agree on mitigation actions to conclude the self-certification process in an effective manner.

10. Revision History

The AESO's Compliance Department revises this document, as needed and to ensure continual improvement. The AESO notifies entities of revisions through the stakeholder update process.

Revision	Date	Comments
1.0	Mar 6, 2025	Initial version