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# Alberta Risk-Based Compliance Monitoring Program Self-Certification Process

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## 1. Introduction

Self-certification of market participants<sup>1</sup> (entity) is one of the tools that the AESO uses to monitor compliance with reliability standards<sup>2</sup> (Alberta Reliability Standards or ARS). Self-certification requires an entity to certify its compliance status with a subset of applicable ARS to the AESO, provide information and evidence if the AESO requests it, and disclose non-compliance.

The objective of self-certification is for the AESO to review the entity's self-certification submission and assess the entity's information and evidence (if applicable) to gain risk-based 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)<sup>3</sup>.

Self-certification encourages entities to implement and maintain an internal compliance program that includes periodic reviews of ARS compliance obligations, and to implement effective internal controls to prevent, detect, and correct ARS non-compliance and improve compliance outcomes in Alberta.

Self-certification is an opportunity for the AESO and entities to collaborate, develop and maintain effective relationships, and demonstrate cooperation and commitment that directly supports the reliability and security of the interconnected electric system<sup>4</sup> (IES).

The AESO conducts self-certification of entities in a manner that promotes transparency, independence, fairness, objectivity, consistency, confidentiality<sup>5</sup>, and efficiency.

## 2. Purpose

The AESO has established this document as a companion document to the Alberta Risk-Based Compliance Monitoring Program (ARCMP)<sup>6</sup>, 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.

## 3. ARS Compliance Portal

The AESO administers the Self-Certification Process within the [ARS Compliance Portal](#). All entities must sign-up for access and complete self-certification through the ARS Compliance Portal and follow the instructions in the [ARS Portal User Guide](#).

## 4. Self-Certification

The AESO determines which ARS requirements the entity must self-certify to. The entity is required to certify its compliance status to the AESO for these ARS requirements. The AESO may request that the entity submit information and/or evidence to the AESO for a subset of the in scope ARS requirements. The AESO may provide targeted Information Requests to the entity which may take the form of guided questionnaires, surveys, and/or a request for specific evidence for an ARS requirement(s). The AESO may request that the entity provide completed Reliability Standard Audit

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<sup>1</sup> As defined by the *Electric Utilities Act*, SA 2003, c E-5.1

<sup>2</sup> As defined by the *Transmission Regulation*, AR 86/2007, s. 19

<sup>3</sup> Pursuant to the *Electric Utilities Act*, Section 21.1

<sup>4</sup> As defined by the *Electric Utilities Act*, SA 2003, c E-5.1

<sup>5</sup> Pursuant to Section 103.12 of the ISO rules, *Compliance Monitoring* and Section 103.1 of the ISO rules, *Confidentiality*

<sup>6</sup> [AESO Website, ARS Compliance Monitoring](#)

Worksheets (RSAW) and/or a completed Alberta Evidence Request Tool (ALBERT) as part of its submission. The AESO may issue follow-up Information Requests, or request interviews with the entity to clarify the entity’s submission.

## 5. Self-Certification Schedule

The AESO requires an entity to self-certify on a frequency in accordance with its Compliance Oversight Plan (COP). The AESO provides a monitoring schedule to an entity as part of the Compliance Oversight Plan Process<sup>7</sup> that indicates what monitoring tools apply to it for the next three calendar years, including whether self-certification is required in that timeframe. Changes to the AESO’s self-certification schedule may occur at any time due to factors including identification of or changes to emerging 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.

### 5.1 Self-Certification Timeline

The AESO sends the self-certification notification to the entity required to self-certify in a specific year on or before March 31. The entity must submit its self-certification to the AESO by June 30. The AESO assesses the entity’s self-certification submission from July 1 to October 31 and closes the self-certification by December 20. The AESO may modify the self-certification period and timelines at its discretion and will notify the entity<sup>8</sup>. Figure 1 below illustrates the self-certification timeline.

Figure 1: Self-Certification Timeline



\* - Typically the previous calendar year. However, the AESO may adjust the period at its discretion

## 5.2 Requests to Extend, Change, Delay or AESO Changes

### 5.2.1 Self-Certification Submission Extension Request

An entity may request an extension to its self-certification submission due date by sending a request to [rscompliance@aeso.ca](mailto:rscompliance@aeso.ca) prior to June 15. The AESO evaluates the request and notifies the entity of the result within five business days of receiving the request.

<sup>7</sup> [AESO Website, ARS Compliance Monitoring](#)

<sup>8</sup> The AESO may modify the self-certification timeline and period based on risk, the ARS requirements in scope (e.g., an ARS requirement may include a 15-month periodic review, etc.), or AESO resource availability.

### 5.2.2 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, unplanned outage, business continuity plan activation, recovery, etc.).

An entity submits its request to [rscompliance@aeso.ca](mailto:rscompliance@aeso.ca) and 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.

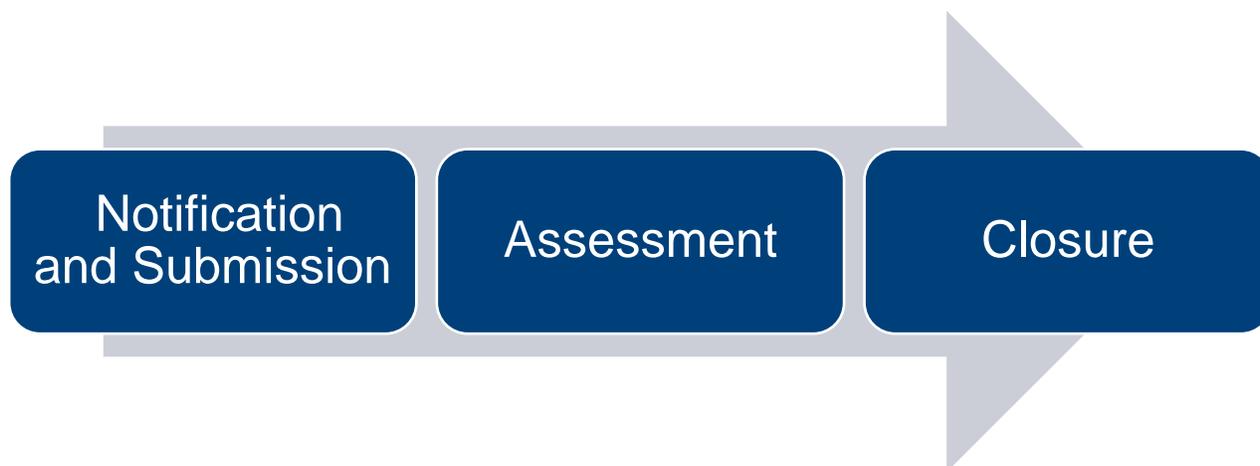
### 5.2.3 AESO Initiated Changes

The AESO notifies an entity if it changes, delays, extends, or cancels a self-certification.

## 6. Self-Certification Process

Figure 2 below illustrates the three phases in the self-certification process.

Figure 2: Self-Certification Phases



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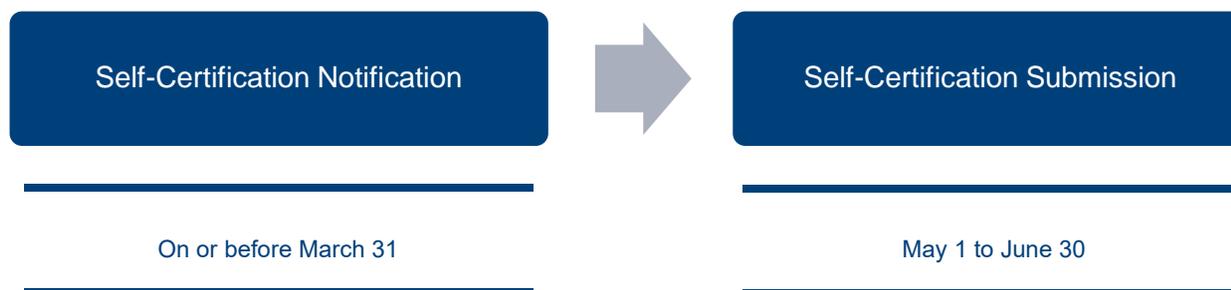
March 31 to December 20

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## 6.1 Self-Certification Notification and Submission

Figure 3 illustrates the two steps in the self-certification notification and submission phase.

**Figure 3: Self-Certification Notification and Submission Steps**



### 6.1.1 Self-Certification Notification

The AESO sends the self-certification notification to the entity’s primary and secondary compliance contacts on or before March 31. The notification includes the self-certification scope, self-certification period, submission timelines, requests for information and/or evidence, and instructions and expectations related to evidence submission (if applicable).

### 6.1.2 Self-Certification Submission

The entity must submit its self-certification to the AESO using the ARS Compliance Portal between May 1 and June 30.

The entity must declare one of the following statuses<sup>9</sup> for each ARS requirement in scope of self-certification:

- Compliant for Entire Period - Yes: Entity declares itself to be compliant for the entire self-certification period.
- Compliant for Entire Period – No: Entity declares itself to be non-compliant for a portion of or the entire self-certification period. The entity must provide start and end dates for the non-compliance and indicate if it self-reported to the MSA, including relevant comments and the MSA file number.

The entity must provide an explanation in its self-certification submission if it considers an in scope ARS requirement as not applicable during a portion of or the entire self-certification period.

### Self-Certification Questionnaire and/or Evidence

The AESO may request that the entity complete a guided self-certification questionnaire and/or submit specific evidence for an ARS requirement(s). The AESO requests this information from the entity in the form of an Information Request. The entity must provide detailed responses, and any corresponding information and/or evidence that the AESO has requested as a part of its self-certification submission. The entity uploads the completed self-certification questionnaire and evidence (if applicable) to the ARS Compliance Portal by opening a Communication channel within its self-certification.

<sup>9</sup> The entity bases its declaration and submission on its internal due diligence and verification of evidence.

## RSAW and ALBERT

The AESO may request that the entity submit a completed RSAW<sup>10</sup> and/or ALBERT<sup>11</sup> for a specific ARS requirement(s) in scope of self-certification, typically in the self-certification notification. The entity uploads the completed RSAW and/or ALBERT to the ARS Compliance Portal by opening a Communication Channel within its self-certification.

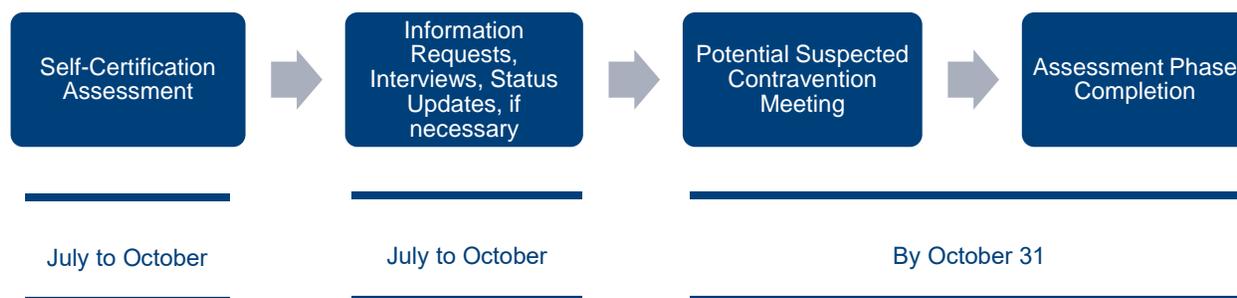
## Information and Evidence Quality

The entity’s evidence must be complete, organized, relevant, and needs to align with and match the information the entity provided in the self-certification questionnaire, RSAW, and/or ALBERT, including correct references to file names, sections, page numbers, etc.

## 6.2 Self-Certification Assessment

Figure 4 illustrates the four steps of the self-certification assessment phase.

**Figure 4: Self-Certification Assessment Steps**



### 6.2.1 Self-Certification and Evidence Assessment

The AESO reviews the entity’s self-certification submission, and (if applicable) self-certification questionnaire responses, completed RSAW(s) and ALBERT(s), and evidence.

If the AESO assesses that the entity’s self-certification submission and/or evidence is insufficient, unclear, incomplete, or does not appear to demonstrate compliance with ARS, the AESO may send the entity an Information Request(s) or hold interviews (see section 6.2.2).

The AESO documents its compliance assessment and retains it in the AESO’s records to support the self-certification assessment.

### 6.2.2 Information Request(s) and Interviews

The AESO’s self-certification process is designed to be targeted and efficient with the objective of reducing unnecessary follow-ups. However, the AESO’s assessment may include one or a combination of the following methods to obtain reasonable assurance of compliance:

#### 6.2.2.1 Information Request(s)

The AESO may request additional information, sampling, and/or evidence from the entity to establish reasonable assurance of the entity’s compliance. The AESO sends this in the form of an Information Request (IR). The AESO may provide a due date between 10 to 15 business days

<sup>10</sup> [AESO Website, ARS Compliance Monitoring, Reliability Standard Audit Worksheets Heading](#)

<sup>11</sup> [AESO Website, ARS Compliance Monitoring](#)

depending on the nature of the IR. The entity should contact the AESO as soon as possible if it has questions or needs clarification about the IR.

If 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.

### 6.2.2.2 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 to request an interview.

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 with the objectives to 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. Common interview topics are:

- the entity's policies, processes, and procedures that are relevant to the ARS requirement(s);
- training programs and competencies of the individuals implementing or accountable for the operations related to ARS compliance;
- 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 self-certification closure.

The entity interview participants are able to quickly confer on an answer to ensure accuracy or validate information before responding to an AESO 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. The AESO sends the IR to the entity following the interview and includes references to the interview and a due date.

The AESO documents the interviews in the form of notes and retains them in its assessment working papers. 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.

### 6.2.3 Status Updates

Depending on the duration and complexity of the assessment, the AESO may provide the entity status updates to notify the entity of assessment progress and next steps.

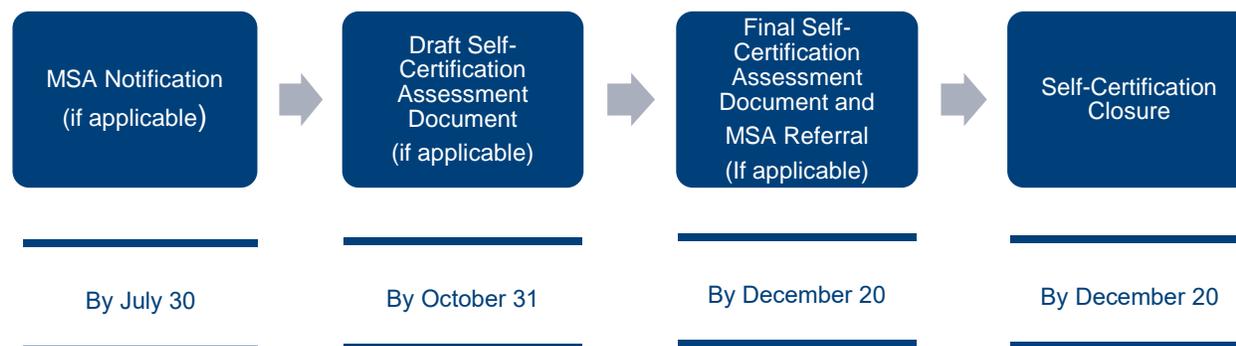
### 6.2.4 Potential Suspected Contravention Meeting

The AESO schedules a meeting(s) with the entity to communicate it has identified the potential that a suspected contravention has occurred. The meeting provides the AESO and entity an opportunity to discuss the issue and to verify the accuracy of the AESO’s assessment. The entity may identify information or evidence that the AESO has not reviewed or considered, and/or the AESO and the entity can discuss the AESO’s interpretation of an ARS to gain clarity. This may result in additional IRs or assessment.

## 6.3 Self-Certification Closure

Figure 5 illustrates the four steps of the self-certification closure phase.

Figure 5: Self-Certification Closure Phase



### 6.3.1 MSA Notification

If the entity self-certified as Non-Compliant for an ARS requirement(s) that the AESO did not request information or evidence for and indicates that it has **not** self-reported to the MSA, the AESO contacts the entity to verify the information and notifies the MSA after 30 days of receiving the entity’s self-certification submission.

### 6.3.2 Self-Certification Assessment Document

The AESO provides the entity with a self-certification assessment document if it identifies a suspected contravention(s). If the AESO’s assessment does not result in a suspected contravention(s), the AESO closes the entity’s self-certification without providing an assessment document (see section 6.3.4).

#### 6.3.2.1 Draft Self-Certification Assessment Document

If the AESO identifies a suspected contravention(s), 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.

### 6.3.2.2 Draft Self-Certification Assessment Document Comments

The AESO provides a comment form for the entity to complete and submit. The entity provides draft self-certification assessment document comments related to inaccuracies, factual and technical errors, and omissions to the AESO within 15 business days.

The AESO reviews all entity comments and, if necessary, updates the self-certification assessment document to correct inaccuracies, factual and technical errors, and omissions. If the entity has no comments or does not submit comments to the AESO within 15 business days, the AESO finalizes the self-certification assessment document.

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

### 6.3.2.3 Final Self-Certification Assessment

The AESO issues the final self-certification assessment document to the entity within 15 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 15 business days.

### **6.3.3 MSA Referral**

If the AESO's final self-certification assessment document includes a suspected contravention(s), the AESO notifies the entity of the AESO's referral of the matter to the MSA.

The AESO provides a copy of the final self-certification assessment document to the MSA. The AESO issues a referral to the MSA on a confidential basis and includes confidential information obtained during self-certification<sup>12</sup>.

### **6.3.4 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. The entity uses the ZIP function within the ARS Compliance Portal to download the self-certification package upon self-certification closure. The entity must download the self-certification package within 60 days of closure, after which time the entity will not have access to the self-certification.

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<sup>12</sup> Pursuant to Section 21.1, *Electric Utilities Act*

## 7. Confidentiality and Retention

### 7.1 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* (ISO rule 103.12). Pursuant to subsection 6 of ISO rule 103.12, the AESO may make information obtained during a compliance monitoring activity available to either or both the Alberta Utilities Commission (AUC) or the MSA.

### 7.2 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.

## 8. 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. 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 [rscompliance@aeso.ca](mailto:rscompliance@aeso.ca). The Manager, External Compliance 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, which 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 and Compliance. The Vice President, Finance and Compliance 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.

## 9. Revision History

The AESO's Compliance Department revises this document, as needed. The AESO notifies entities of revisions to this process through stakeholder communications and engagement processes.

Revision	Date	Comments
1.0	March 6, 2025	Initial version
2.0	March 13, 2026	<p>Major version change</p> <ul style="list-style-type: none"> <li>• Administrative and grammatical changes for clarity</li> <li>• Amended Sections 4, 5, and 6 to reflect changes the AESO communicated to stakeholders at the March 5, 2026 Reliability Standards Discussion Group, plus additional enhancements to process clarity               <ul style="list-style-type: none"> <li>○ Section 4 - deleted references to self-certification types (with and without evidence), combined into single monitoring tool</li> <li>○ Sections 4 and 5 – amended figures 1 and 2 for clarity</li> <li>○ Sections 4 and 6 – added references to guided questionnaire</li> <li>○ Sections 6.2 and 6.3 – removed references to scheduling. The Compliance Oversight Plan process includes scheduling process</li> <li>○ Section 6 – removed reference to Self-Certification Workshop. Unnecessary as the AESO provides training to entities on all compliance monitoring processes</li> <li>○ Section 6 – increased entity response timelines for Information Requests and reporting, and modified timelines in figures 4 and 5 accordingly</li> </ul> </li> </ul>