



# **Self-Reporting Best Practices**

**Shana Horton**  
**Manager, Enforcement**



**Because this event brings together market participants who may be viewed as actual or potential competitors, we must be mindful to conduct it in a manner that is consistent with the antitrust and competition laws. Participants should not disclose non-public, proprietary, or competitively sensitive information.**

**Attendees should exercise independent judgment and avoid even the appearance of discussions of agreements or concerted actions that may be viewed as restraining competition. Any questions on Texas RE's Antitrust Compliance Corporate Policy may be directed to Texas RE's General Counsel.**



**Why is This Important to You?**

**#1 Issue: Mitigation**

**Extent of Condition (EOC)  
Reviews**

**Root Cause**

**Risk Analysis**

**Self-Logging**





# Importance of Quality Self-Reporting

**Less work with  
fewer Requests  
for Information  
(RFIs)**

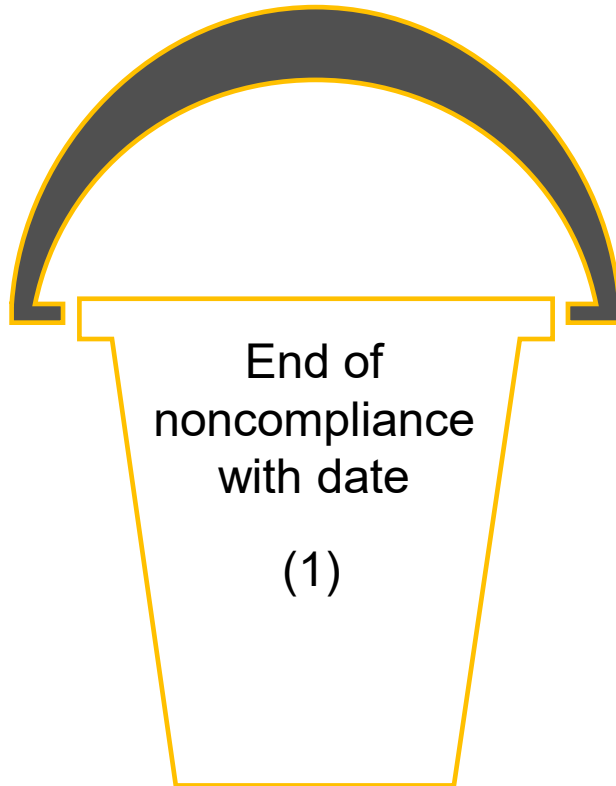
**Quicker off the  
books**

**Chance to use  
your own  
language**

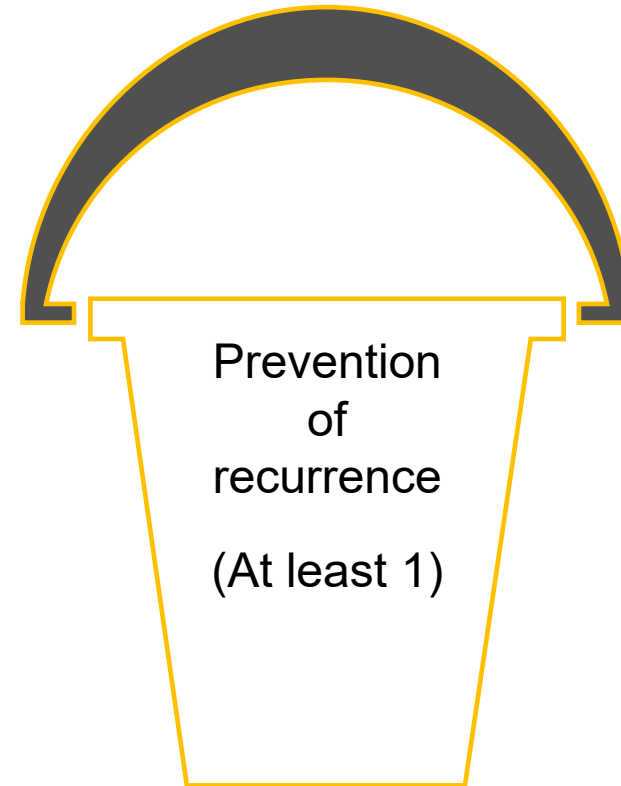
**Save time with  
a little effort on  
the front end!**



# #1 Issue: Mitigation



+



# #1 Issue: Mitigation

## RFI No. 1-9 & 1-11:

Upload to the Secure Evidence Locker (SEL) the dated, documented evidence that reflects the action(s) the entity has taken, or will take, **to end the noncompliance**. For actions that will be taken in the future please provide the estimated date of implementation.

## RFI No. 1-10 & 1-12:

Save and Action into Align the mitigation milestone(s) that reflect the action(s) the entity has taken, or will take, **to end the noncompliance**. Within the milestone, identify by filename the dated, documented evidence that was uploaded to the SEL in response to the previous question.

Learn more about  
Align and the SEL  
in Texas RE's  
Reliability 101:  
Intro to Align!

# #1 Issue: Mitigation

## ☐ Mitigation **MUST** address root cause

### ☐ Examples:

- Root cause: No/inadequate procedures
- Mitigation: Procedure revised to include or emphasize relevant information
  
- Root cause: Employee did not understand requirements of Standard
- Mitigation: Provided additional training to class of employees
  
- Root cause: Lack of preventative controls to ensure timely compliance
- Mitigation: Added calendar reminders ahead of due dates



MITIGATION



# #1 Issue: Mitigation

## ❑ **PRC-005-6: Entity failed to perform scheduled maintenance**

- End of noncompliance: Maintenance performed on (DATE)
- Prevention of recurrence:
  - Added calendar reminders on (DATE)
  - Provided training to relevant employees on (DATE)

## ❑ **CIP-008-6: Entity performed Cybersecurity Incident Response Plan (CSIRP), but not with a reportable incident**

- End of noncompliance: Qualifying CSIRP exercise completed on (DATE)
- Prevention of recurrence:
  - Updated procedure to require management review of CSIRP exercise prior to performance (dated procedure provided in SEL)



## Extent of Condition Review

- What did you do?
- How many sites, devices, components, procedures, or personnel?
- Over what time-period (years, maintenance intervals)?
- Did you find additional instances? What did you do in response?
  - Note these additional instances in your extent of condition (EOC) and include them in your count

Goal: Demonstrate the issue was the only occurrence across the field of related sites, devices, components, procedures or personnel within that time-period.



# Extent of Condition Review Examples

## ❑ Example 1 (inadequate):

- EOC Performed: Yes
- Detailed description: *No additional instances found*

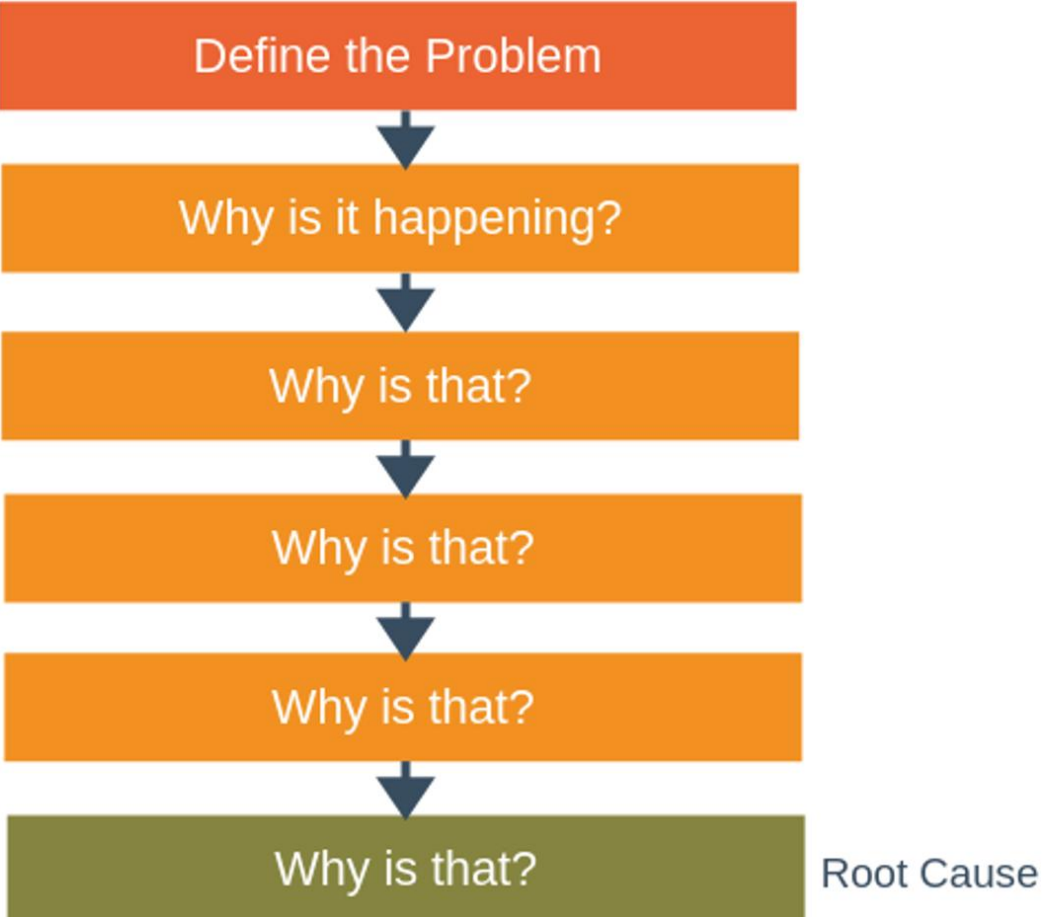
## ❑ Example 2 (better):

- EOC Performed: Yes
- Detailed description: *The entity conducted an extent of condition review, reviewing all 13 BES Elements (digital fault recorders) requiring Dynamic Disturbance Reporting (DDR), and did not identify additional instances.*

❑ *Further review of the extent of condition was not required because the circumstances were unique and limited to the single Facility*



## The 5 Whys





# Root Cause: Commonly Cited Cause Codes

Code	Name and Description
1	<b>Change Management</b> Made changes without understanding the downstream impact of the change on other components of the system and its related processes.
4	<b>Design – Ineffective Process Flow / System Design / Failure of System/Technology</b> Ineffective process or system design Items were missing from design, design-related documentation, or system or technology failure
7	<b>Lack of/Deficient Policy/Procedure – Company Wide</b> Ineffective management policy – high level, company-wide Needs new policy/procedure/process (did not exist) or was deficient
8	<b>Lack of/Deficient Policy/Procedure – Department/Business Level</b> Ineffective business-level procedure/process – standard operating procedure, instructions, department-based Needs new policy/procedure/process (did not exist) or was deficient
9	<b>Ineffective Preventive Controls</b> Lack of or ineffective internal controls designed to prevent noncompliance Detective controls were implemented but there was an ineffective or lack of a preventative control (e.g., checklist, secondary reviewer, workflow, or a backup or a redundant control)
10	<b>Ineffective Validation/Detective Controls</b> Lack of or an ineffective validation/detective control Preventative controls were implemented but there was an ineffective or lack of a validation/detective control after completion of the task



# Root Cause: Common Cause Codes

Code	Name and Description
11	<p><b>Additional Training Needed</b></p> <p>Training program is adequate but additional training needed</p> <p>The overall training program was adequate but training on a required task was not part of the employee's training requirements or frequency of the training was insufficient to maintain the required knowledge and skill to perform the job (e.g., did not consider the complexity of certain tasks or individual's skillset or experience). If the training design/content is adequate, but the entity failed to effectively deliver it to their employees or track the required training.</p>
12	<p><b>Lack of/Deficient Training Materials and Content</b></p> <p>The quality of the training objective, or training content and/or material was incomplete or unclear such that it did not contain all the information necessary for staff to fully perform all the task requirements in the procedure.</p>



Often the  
first why

Rarely the  
last why

Often results in  
an RFI



## For Generators

- Low capacity factor
- Not a Blackstart Resource and not relied upon for System restoration
- Not a unit generally relied upon for voltage/frequency support (ancillary services)
- The Facility's energy output or capacity was unaffected



## For Transmission

- None of the Facilities affected involve an Interconnection Reliability Operating Limit (IROL), inter/intra area interfaces, and no system operating limits (SOLs) were violated
- Deviation was well below capacity of Facility
- Low traffic on affected Facility
- No system issues occurred due to the noncompliance
- Had there been a loss of the Facility, there was sufficient capacity at other Facilities



## General

- Low percentage of affected Facilities/assets/elements/equipment, etc.
- Small deviation from applicable requirement
- Short duration of the noncompliance
- After the required review was completed, no updates/settings changes were found to be needed and the equipment was working normally
- Other Facilities/devices operated as a backup to the affected noncompliant Facility/device
- No harm occurred, no relay operations at all, no impacts to neighboring entities, etc.
- The required information was provided in an alternative manner or was partially provided
- There would have been an alarm had there been an issue with the affected equipment
- The staff members that missed the required periodic training had received the training during a previous periodic training event (not a first-timer)



**Requirements for Self-Log =  
Requirements for Self-Report**

**Presumption of accuracy, completeness**

**Texas RE will analyze as usual, but use  
your language if it addresses all required  
elements and tells the story clearly**

**Minimal risk ONLY!**

<b>Average Processing Time for Self-Reports vs. Self-Logs 2020-2025 (months)</b>	
Self-Logs	3.6
Self-Reports	12.2

**Self-Logs are much faster!**



# Self-Logs: Approved Examples

Reliability 201 - 2026 - Enforcement: X N 2026

https://www.nerc.com/programs/enforcement/enforcement-actions/2026

Account Log-In/Register

NERC Who We Are Our Work Standards Programs Initiatives Applications Events Search

Programs > Enforcement Disposit... > 2026

## 2026 NERC Enforcement Filings to FERC

2026

2025

2024

2023

2022

2021

2020

2019

2018

2017

### 2026 Filings

Docket Number	Title/Summary	Date
NP26-6-000	<a href="#">February 2026 Spreadsheet Notice of Penalty under NP26-6</a>	2/26/2026
NP26-4-000	<a href="#">January 2026 Spreadsheet Notice of Penalty under NP26-4</a>	1/29/2026
	<a href="#">Errata to January 2026 Spreadsheet Notice of Penalty under NP26-4</a>	2/18/2026

NERC  
Washington Office  
1401 H Street NW  
Suite 410  
Washington, DC 20005  
202-400-3000

Who We Are  
Careers  
Newsroom  
Contact Us  
Account Log-In/Register

Our Work  
Standards  
Programs  
Initiatives  
Applications

Follow us on:



# #1 Issue: Mitigation

**One to end noncompliance**

**One or more to prevent recurrence**

**Root cause and mitigation should “rhyme”**

**Provide dated evidence for end of noncompliance**

## Resources

**[2026 Enforcement Actions](#)**

**[Registered Entity Self-Report and Mitigation Plan](#)**

**[Self-Logging Program User Guide](#)**



[Enforcement@TexasRE.org](mailto:Enforcement@TexasRE.org)