

July 2009 CIP Self-Certification

June 22, 2009

As referenced in the letter to the Registered Entities, dated June 10, 2009, from David Hilt, NERC's Vice President and Director of Compliance, this self-certification is divided into two parts. The first part consists of the questions asked on prior semiannual self-certifications to establish progress toward compliance with the CIP-002 through CIP-009 Reliability Standards, including questions specifically asking whether a Registered Entity has met its "substantially compliant," "compliant," and "auditably compliant" milestones in the implementation of these CIP Standards. As before, entities that are not yet required to be at the "compliant" stage under the CIP implementation plan will not be subject to monetary penalties if they are unable to certify that they are on schedule under the implementation plan. Entities that have reached the "compliant" date in the applicable table of the Implementation Plan are subject to the full range of penalty options for noncompliance.

The second part of this self-certification includes questions seeking additional detail concerning the nature of facilities designated as critical assets under Reliability Standard CIP-002-1. As reflected in Mr. Hilt's letter, no information will be collected regarding the identity of any specific facilities and the response to the second part of the self-certification will not be used to determine compliance with CIP-002-1. Nevertheless, because this information is important to develop an overall picture of the industry's progress toward compliance with the CIP Reliability Standards collectively and each individual entity's compliance specifically, entities in receipt of these supplemental questions are required to respond to all applicable questions.