



Instructions for Submission of Mitigation Plans Using the SERC Portal

These instructions are reflected in the training document [SERC Portal Mitigation Plans 4-7-10.pdf](#) available on the public SERC website. Please see also SERC Table of Mitigation Plan Criteria that follow these instructions for additional guidance on expected information and unacceptable responses.

1. Mitigation plans may be submitted at any time after the identification of a possible violation of a reliability standard. It is considered to be an act of good faith to submit a mitigation plan promptly without waiting for the issuance of a Notice of Alleged Violation and is highly encouraged.
2. If not already submitted, mitigation plans must be submitted within 30 days following the issuance of a Notice of Alleged Violation and Proposed Sanction or Penalty. SERC also requires mitigating actions to be taken as part of a settlement to be submitted in the form of a mitigation plan.
3. Use the form available on the SERC portal. Log in to the home page, in the left-hand column click on Mitigation Plans and Add Mitigation Plan (if you do not see Mitigation Plan in the left hand column, contact your MAA).
4. Section A, Compliance Notices & Mitigation Plan Requirements
 - a. "Attachment A" to the form contains legal information from the CMEP. Be familiar with these requirements before completing and submitting a mitigation plan.
 - b. The checkbox in A.2 must be checked in order to submit a mitigation plan.
5. Section B, Registered Entity Information
 - a. Check the accuracy of the information shown for your company. This data comes from SERC's compliance registry database. If there is an error, please send an email to serccomply@serc1.org.
 - b. Click the "find" button to change the name of the technical contact for this mitigation plan.
6. Section C, Identification of Alleged or Confirmed Violation(s) Associated with this Mitigation Plan
 - a. Use the pull-down menu to select the reliability standard applicable to this mitigation plan and select the requirement(s). Note that the mitigation of multiple violations of one standard may be reported on a single form; however the plan must be limited to mitigation of violations of only one standard. For example, the mitigation of PRC-005-1 R1 and R2 may be mitigated in the same plan, but FAC-008-1 R1 and FAC-009-1 R1 cannot.
 - b. Complete section C.2 by describing the "underlying cause" of the possible violation. Note that a "root cause analysis" is not expected or required. This statement by the entity should include a description of the entity's evaluation of how and why the violation occurred. A statement such as "the audit team found ..." or "it was self-reported" is not a description of the cause of the violation. Whatever is stated as the cause of the



violation in C.3 is what should be corrected in the description of mitigating actions in Section D.

- c. C.3 is an optional field for additional information. This section should not be used as a forum for stating opinions. If appropriate, the entity may make a statement that the submission of the mitigation plan was done in an abundance of caution and is not admission of a violation. In any case, do not increase the scope or contradict anything that is already discussed in sections C. If an attachment is used, please indicate a reference to it in this section. Note: The mitigation plan must be “saved” before attachments can be entered.
7. Section D, Details of Proposed Mitigation Plan
 - a. In D.1, describe the action plan that will correct (or has corrected) the violations identified in C.1 and the underlying cause of the violation described in C.2. This description should be complete enough that an uninitiated observer can understand how the violation will be mitigated. It should show a level of commitment to promptly correcting the cause of the violation. Additional information may be attached if necessary.
 - b. Section D.2 must be completed with the date by which the entity can commit to complete the mitigation plan. The date entered in D.2 is the date by which all of the actions described in Section D.1 will be completed. NOTE: This date becomes a commitment date and additional penalties and sanctions may be applied for failure to meet that date. “Target” dates are unacceptable.
 - c. D.3 can be skipped if the mitigation plan is already completed. The table in D.3 should be completed with sufficient detail to effectively measure progress. Proposed milestone completion dates must be provided and, as indicated on the form, must not be greater than three months apart. Note: The mitigation plan must be “saved” before milestones can be entered.
 8. Section E, Interim and Future Reliability Risk
 - a. Some mitigating actions will require the bulk electric system to experience a certain amount of risk during their implementation. If additional risk is possible during the implementation of this plan, describe that risk and how it will be minimized in section E.1.
 - b. Describe how the mitigation plan actions will prevent future violations in section E.2.
 - c. After completion of Section D and saving the mitigation plan form, SERC staff suggests that you email John Wolfmeyer (jwolfmeyer@serc1.org) to request a preliminary review of the mitigation plan. This review is intended to help identify shortcomings or errors in the plan that need to be addressed prior to acceptance by SERC.
 - d. When the mitigation plan is ready for the authorized signature, notify the signatory that the plan is available on the portal.
 9. Section F, Authorization
 - a. All required information must be completed before the authorized individual can sign the mitigation plan.



- b. This section is not visible unless the individual logged in to the SERC portal is an authorized signatory.
- c. When the mitigation plan is ready for submission to SERC, just click on "Sign."

10. Section G, Regional Entity Contact

If you have any questions regarding this form, contact John Wolfmeyer (jwolfmeyer@serc1.org) at 704-357-7372.



SERC Table of Mitigation Plan Criteria

Mitigation Plan (MP) Component	Expected Information	Unacceptable Responses
Registered Entity Contact [Mitigation Plan Submittal Form Item(s) B.2]	CMEP Section 6.2 states that Contact must be: <ol style="list-style-type: none"> 1. Responsible for filing the MP. 2. Technically knowledgeable regarding the MP. 3. Authorized & competent to respond to questions regarding the status of the MP. 	<ul style="list-style-type: none"> • A person that does not have the level of responsibility. • A person that cannot provide technical knowledge of the mitigation plan.
Identification of Violation(s) [Mitigation Plan Submittal Form Item(s) C.1; C.2]	<ol style="list-style-type: none"> 1. Identify the specific requirements of the standard consistent with the possible violation(s) identified by the entity or which SERC has alleged or confirmed, as applicable. 2. Describe how each of these requirements was possibly or allegedly violated and include what has been determined to be the underlying cause of the violation. 	<ul style="list-style-type: none"> • Incorrect Standard / Requirement • Inconsistent description of how the requirements were violated. • Missing description. • Missing Standard or Requirement reference.
MP Contents [Mitigation Plan Submittal Form Item(s) D.1]	<ol style="list-style-type: none"> 1. MP must directly address the violation(s). 2. MP must be specific in how the entity plans to become compliant. 3. Reasonable detail is required at the requirement level unless more aggregate grouping is reasonable. 4. MP must address each requirement at suitable levels of specificity and exactness. 5. MP completion will result in full compliance with requirement(s). 	<ul style="list-style-type: none"> • “We will prepare and implement a plan to correct the violations.” • “We are initiating a compliance program that, when implemented, will correct the violations(s).” • “We hired ABC consultant to determine a plan to become compliant”. • “We hired ABC consultant to implement the MP.” • “We will produce a “procedure” if the requirement indicates a “document” is required.



Mitigation Plan (MP) Component	Expected Information	Unacceptable Responses
Date of full implementation of MP [Mitigation Plan Submittal Form Item(s) D.2]	1. Entity is committing that its proposed plan (or milestone) will be completed by the date set forth in this section and understands that additional sanctioning will be assessed if the MP is not completed on time.	<ul style="list-style-type: none"> • Words like “anticipated” or “target” completion date. • A missing completion date.
Milestones [Mitigation Plan Submittal Form Item(s) D.3]	1. Every MP should include milestones. 2. MP with duration over 3 months must include milestones.	<ul style="list-style-type: none"> • Missing milestones for MP with duration over 3 months. • Milestones more than 3 months apart.
Abatement of Interim BPS Reliability Risk [Mitigation Plan Submittal Form Item(s) E.1]	1. In general, this section does not need to be completed if the mitigation plan is being submitted complete. 2. Explain any continuing or additional risk to the BPS during the period of time during which the MP will be completed.	<ul style="list-style-type: none"> • “we aren’t doing anything” or • “we don’t need to do anything” because either <ul style="list-style-type: none"> (i) “the violation(s) has(have) no impact on the reliability of the BES” or (ii) “we have no impact on the reliability of the BES”.
Registered Entity’s Plan to prevent recurrence of the alleged or confirmed violations. [Mitigation Plan Submittal Form Item(s) E.2]	1. Section E.2 of the mitigation plan must be proactive regarding future violations of the same or any other reliability standard, particularly ones that are similar to the one violated. For instance, an entity that has incurred a violation for failure to have documentation required for one standard should ensure, and correct if necessary, that it has acceptable documentation for all other standards it is responsible for. 2. Accordingly, acceptable completion of E.2 of the MP form is required even where the MP has been completed and the form is being completed and submitted as a matter of record.	<ul style="list-style-type: none"> • Failure to include this information or inadequate attention to this aspect of the MP may result in plan rejection