



SERC Guidelines for Submission of Mitigation Plans

Please see also [SERC Table of Mitigation Plan Criteria](#) 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 website at <http://www.serc1.org/Application/ContentPageView.aspx?ContentId=66>
4. The fields before Section A
 - a. "The date this Mitigation Plan is being submitted" should be the date that the plan is submitted electronically to serccomply@serc1.org.
 - b. Check the box in the first bullet if and only if the mitigation plan being submitted has already been completed. Include the actual date of completion. This date must be the same as the date being submitted or occur before that date. Please note that even if a mitigation plan is being submitted as complete, with the box checked in Section A, a separate Mitigation Plan Closure Certification must also be submitted.
5. Section A, Information
 - a. Please read this section carefully as it provides many legal points regarding the submission of mitigation plans.
 - b. There are no fields to be completed in Section A.
6. Section B, Entity Information
 - a. Please provide complete and accurate information regarding the entity's name and address as set forth in the NERC Compliance Registry. The NERC Compliance Registry is available at <http://www.nerc.com/page.php?cid=3|25>
 - b. Provide complete information for the technical contact for these violations. You will supply the information for the executive and compliance contacts later in the form.
7. Section C, Violation Description
 - a. Complete section C.1 and C.2 with all known information. Note that 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.3 by describing the "root cause" of the possible violation. 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.4 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.
8. Section D, Mitigating Actions
 - a. In D.1, describe the action plan that will correct (or has corrected) the violations identified in C.2 and described C.3. 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.
 - b. Section D.2 and D.3 can be skipped if the mitigation plan is already completed. Be sure to check the appropriate box if it has been completed and submit a separate Mitigation Plan Closure Certification.
 - c. 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.
 - d. The table in D.3 should be completed with sufficient detail that the progress toward compliance may be effectively measured. Proposed milestone completion dates must be provided and, as indicated on the form, must not be greater than three months apart.
 - e. D.4 is optional. 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 D. If an attachment is used, please indicate a reference to it in this section.
 9. Section E, Actions to Prevent Recurrence
 - 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. E.3 is optional and can be used to explain actions that will be taken beyond the mitigation plan to prevent a recurrence of a violation. If an attachment is used for this purpose, include a reference to it here.
 10. Section F, Authorization



- a. Include all required information for the authorized individual who will sign the mitigation plan.
 - b. Electronic signatures are permitted. In order to provide a text-searchable and electronically signed copy, please print the form as a text searchable pdf. before electronically signing it. You may also type in the authorized signatory name preceded by “/s/” as an electronic signature.
11. Section G Comments and Additional Information
- a. This is an optional section that can be used for any other relevant information. If an attachment is used for this purpose, include a reference to it here.

Please convert the completed form to a text-searchable pdf file, rename it *Entity Name MP (STD-XXX) MM-DD-YY.pdf* and email it to serccomply@serc1.org.

If you have any questions regarding this form, contact the SERC Single Point of Contact (SPOC) assigned for the issue or Ken Keels (kkeels@serc1.org), 704-357-7372.



SERC Reliability Corporation 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: 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]	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 (root cause).	<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]	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 of 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.
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. • Any additional time. • A missing completion date.



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<p>Milestones [Mitigation Plan Submittal Form Item(s) D.3]</p>	<p>1. MP should include milestones. 2. MP with duration over 3 months must include milestones.</p>	<ul style="list-style-type: none"> • Missing milestones for MP with duration over 3 months. • Milestones more than 3 months apart.
<p>Abatement of Interim BPS Reliability Risk [Mitigation Plan Submittal Form Item(s) E.1]</p>	<p>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.</p>	<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”.
<p>Registered Entity’s Plan to prevent recurrence of the alleged or confirmed violations. [Mitigation Plan Submittal Form Item(s) E.2]</p>	<p>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.</p>	<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