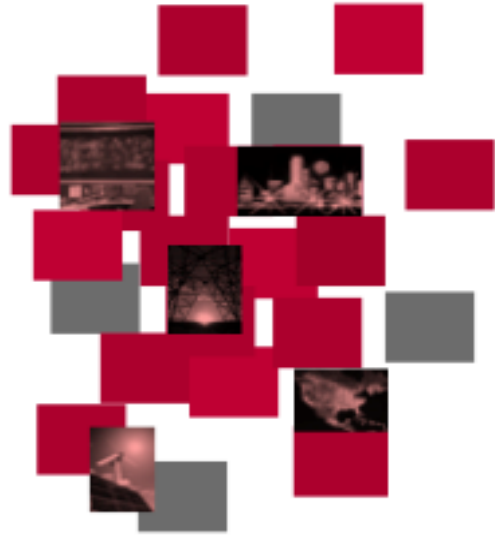
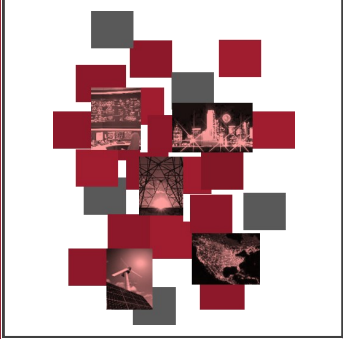


CERTREC[®]
YOUR REGULATORY EXPERTS



Maintaining NERC Compliance with a “Living” Internal Compliance Program



A “Living” Internal Compliance Program

“It’s the responsibility of the Registered Entity to comply and take necessary action to meet standards. It’s the responsibility of the RE to develop a multi-year plan for continuous internal compliance monitoring...and demonstrate a culture of compliance.”
– NERC, “Compliance Analysis,” June 2011

An internal Compliance Program is critical for Registered Entities seeking to demonstrate compliance with FERC, NERC, and Regional Entity Standards and directives.

An Internal Compliance Program (ICP) should:

- Identify compliance risks
- Demonstrate daily accountability regarding NERC Standards and Regional Entity Directives
- Provide ongoing training
- Substantiate evidence of self-assessment
- Demonstrate maintenance of “living” records
- Enforce self-monitoring, internal controls, and corrective actions
- Support a culture of compliance

However, maintaining Internal Compliance programs may be challenging for NERC compliance managers who may lack the expertise, time, or resources necessary to maintain such an in-depth program.

To supplement limited resources and knowledge, NERC compliance managers are choosing Certrec’s **“Living” Internal Compliance Program** - a complete solution for maintaining NERC and Regional Entity Compliance.

Ensure that Your Internal Compliance Program is Current, Compliance, and Efficiently Managed with Certrec’s “Living” ICP

NERC’s Internal Compliance Program Checklist

- ▶ How frequently does the Registered Entity (RE) review its Internal Compliance Program?
- ▶ How frequently is training provided?
- ▶ Is there an ongoing process for monitoring compliance with regulations?
- ▶ Does the RE provide Informal recommendations for process improvements or how to better demonstrate compliance?
- ▶ Does the RE adopt and ensure enforcement of internal controls and procedures?
- ▶ Does the RE demonstrate accountability by timely recognition of problems, self-reporting, and implementing solutions?
- ▶ Does the RE prevent recurrence of non-compliance?

“Living” Internal Compliance Program

Certrec’s “Living” Internal Compliance Program is designed to provide the necessary structure, tracking, and training needed to meet regulatory expectations on an ongoing basis.

Certrec’s highly experienced compliance, audit, and project management specialists ensure that your Internal Compliance Program is current, compliant, and managed efficiently by providing:

- ✓ **Program Management and Oversight**
- ✓ **Monitoring of Changing Standards and Requirements**
- ✓ **Maintenance of “Living” Compliance Program**
 - Monitor and Address NERC Reliability Standard and Program Changes
 - Update, Manager, and Control Documents
 - Maintain Required Evidence
 - Conduct Periodic Compliance Culture Evaluation
 - Provide Ongoing Compliance Training
 - Ensure COSO-Based Internal Controls
 - Maintain a “Living” RSAW
 - Manage Corrective Action System
 - Manage Self-Assessment and Self-Reporting
 - Administer Implementation Effectiveness Review
- ✓ **NERC Audit Support**
 - Conduct Audit Preparation
 - Conduct Mock Audits
 - Provide Direct Audit Support
 - Manage Mitigation Plans



Regulatory Compliance Experts

Founded in 1988, Certrec is a regulatory compliance expert that helps utilities manage the regulatory process to their advantage.

With more than 300 cumulative years of regulatory and industry experience with the Nuclear Regulatory Commission, the Federal Energy Regulatory Commission, the North American Electric Reliability Corporation (NERC), and other Regional Entities,

Certrec's:

- ▶ Office of Licensing and Compliance
- ▶ Office of NERC Compliance
- ▶ Office of Assessment and Recovery
- ▶ New Plant Services

are used by utilities across North America.

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