





## Align: Start, Stop, Continue Guide

### Regional Entities

Use this document to familiarize yourself with Regional Entity Align process changes!

### Executive Summary





Overview	
	<p>Align is a new software tool that support the ERO’s vision of a single business process shared across our industry, tracking compliance data through a central hub that integrates CORES registration data with compliance monitoring and enforcement activities. Release 1 will include self-reporting/self-logging, enforcement processing, and mitigation functionality in the Align system, as well as the deployment of the ERO Secure Evidence Locker (ERO SEL). The ERO SEL will be used to collect registered entity-provided evidence as part of the ERO Enterprise’s CMEP activities. Align and the SEL are built in a way that requires changes to the processes and language you use today, and this guide will help you understand those changes and what to expect upon our first production release.</p> <p>It is important to note that Align Release 1 will utilize a phased launch approach with the initial two regions (Texas RE &amp; MRO) going live first with a certain segment of their registered entities. The remaining four regions will transition to Align approximately 4 to 6 weeks after the initial Release 1 launch. During the transition <b>you will complete all monitoring, enforcement, and reporting functions using existing tools and processes for regions and registered entities not transitioned to Align.</b></p>
<p>To what level is my work impacted due to this change? <span style="float: right; color: orange;"><b>Moderate</b></span></p>	
Start/Stop/Continue	
<p><b><i>What should you start doing?</i></b></p> <div style="text-align: center; margin-top: 10px;">  </div>	<p><b><u>For noncompliance that begins in Align</u></b></p> <ul style="list-style-type: none"> <li>Performing Self-Log (if applicable based on your regional self-log process) &amp; Self-Report processes in Align</li> <li>Performing enforcement activities (e.g., Violation Processing, Dismissals, CEs, FFTs, and Settlement/NOCV processes) in Align</li> <li>Performing mitigating activities &amp; Mitigation Plan tracking and reporting processes in Align</li> <li>Initiating PNCs in Align if discovered through a Self-Certification, PDS, TFE, Compliance Audit, Spot Check, Compliance Investigation or Complaint</li> <li>If necessary, review associated evidence in the ERO SEL</li> </ul>

<p><b>What should you stop doing?</b></p> 	<p><b>For noncompliance that began in CITS/CDMS</b></p> <ul style="list-style-type: none"> <li>• Performing your Self-Log (if applicable based on your regional self-log process) &amp; Self-Report processes using existing tools (e.g., WebCDMS, CITS)</li> <li>• Collecting evidence through legacy tools</li> </ul>
<p><b>What should you continue doing?</b></p> 	<ul style="list-style-type: none"> <li>• Performing processes related to Self-Certifications, Periodic Data Submittals, Technical Feasibility Exceptions, Compliance Audits, Spot Checks, Compliance Investigations and Complaints using existing tools</li> <li>• Performing all Compliance Planning activities (e.g., COP, IRA, ICE) using existing processes and tools</li> <li>• Reporting on non-Release 1 activities using existing tools and processes (e.g., Self-certifications, PDS, Audits, etc.)</li> </ul> <p><b>For noncompliance that began in CITS/CDMS</b></p> <ul style="list-style-type: none"> <li>• Performing your enforcement activities (e.g., Violation Processing, Dismissals, CEs, FFTs, and Settlement/NOCV) using existing tools (e.g., WebCDMS, CITS)</li> <li>• Performing your mitigation activities &amp; Mitigation Plan tracking and reporting processes using existing tools (e.g., WebCDMS, CITS)</li> </ul>
<p><b>Additional Details</b></p>	
<ul style="list-style-type: none"> <li>• The Align Release 1 Start, Stop, Continue Executive Summary provides only high-level information on process, terminology, and tool changes</li> <li>• Please see the section below for detailed information on what processes will be completed in Align vs. existing tools</li> </ul>	

Impact Scale	
Significant	<ul style="list-style-type: none"> <li>• Significant impact resulting in fundamental changes in tools and/or processes. You will likely require significant training to perform in your role. In addition, new tasks may be added, or current tasks may be eliminated from your role</li> </ul>
Moderate	<ul style="list-style-type: none"> <li>• Several ways in which you do your jobs will change. You may have new work, requiring new skills that will potentially require some training</li> </ul>
Low	<ul style="list-style-type: none"> <li>• Minimal changes to the way you do your jobs. Existing tools and processes will remain in place. Training not required.</li> </ul>

## Detailed Guides:

### 1. Self-Reporting & Self-Logging

Overview	
	<p>When a Registered Entity has identified a potential non-compliance (PNC), they will create the Self-Report in Align. An entity that is approved for self-logging will either add Self-Log items directly into Align or continue submitting Self-Logs via spreadsheet dependent on regional processes.</p>
<p>To what level is my work impacted due to this change? <span style="float: right;"><b>Moderate</b></span></p>	
Start/Stop/Continue	
<p><b>What should you start doing?</b></p> 	<ul style="list-style-type: none"> <li>• Provisioning access for Self-Logging in Align if applicable based on your regional self-log process</li> <li>• Receiving notification that Self-Log &amp; Self Report has been initiated in Align</li> <li>• Initiating preliminary screen process in Align tool</li> <li>• Receiving evidence through the ERO SEL</li> </ul>
<p><b>What should you stop doing?</b></p> 	<ul style="list-style-type: none"> <li>• Receiving notifications that Self-Log (if applicable based on your regional self-log process) &amp; Self-Report has been initiated in existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>• Initiating preliminary screen process in existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>• Receiving evidence through legacy tools</li> </ul>
<p><b>What should you continue doing?</b></p> 	<p><b><u>For non-U.S. jurisdictional noncompliance</u></b></p> <ul style="list-style-type: none"> <li>• Receiving notifications that Self-Log &amp; Self-Report has been initiated in existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>• Initiating preliminary screen process in existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>• Receiving evidence through legacy tools</li> </ul>

### Additional Details

- Self-Reports and Self-Logs allow flexibility to add mitigating activities before or after Registered Entity submits initial report
- Whether or not the entity chooses to add mitigating activities to the report, your action in this process is the same; you'll be notified of the new report and initiate the preliminary screening process
- Any Registered Entity can report a PNC through a Self-Report by default
- The ability to Self-Log is exclusive to those entities that have been vetted through an evaluation process, and must be provisioning by the CEA in Align
- If the entity has not been vetted into the Self-Logging program, they will not have the ability to submit Self-Logs in Align; the vetting process is done outside of Align

## 2. Preliminary Screen & Potential Non-Compliance Review (PNCR)




### Overview



Once a Self-Report or Self-Log is submitted by a Registered Entity, it triggers the preliminary screen and the Potential Non-Compliance Review (PNCR). These are tightly linked and will be reviewed below.

To what level is my work impacted due to this change?

**Moderate**

<b>Start/Stop/Continue</b>	
<p style="text-align: center;"><b>What should you start doing?</b></p> <div style="text-align: center;"></div>	<p><b><u>For noncompliance submitted into Align</u></b></p> <p><b><i>Preliminary Screen:</i></b></p> <ul style="list-style-type: none"> <li>• Reviewing PNC, within 5 business days of submittal, to:           <ul style="list-style-type: none"> <li>○ ensure the reliability standard requirement that was potentially violated was applicable, approved, and in effect at the time of the PNC</li> <li>○ check if the PNC violates the same standard and requirements as another possible violation or alleged violation already being processed               <ul style="list-style-type: none"> <li>▪ if yes, you may choose to link PNC to existing open enforcement action (OEA)</li> <li>▪ if no, evaluate if PNC is a true duplicate, and mark as failed screen</li> </ul> </li> </ul> </li> <li>• If PNC passes, marking PNC passed in Align</li> <li>• If PNC fails, marking as failed screen in Align</li> </ul> <p><b><i>Potential non-Compliance Review (PNCR):</i></b></p> <ul style="list-style-type: none"> <li>• Completing PNC Review (e.g., Risk Analysis, Root Cause Analysis, Extent of Condition Review) in Align</li> <li>• Making determination on PNC and marking accordingly in Align           <ul style="list-style-type: none"> <li>○ If out of compliance, make all comments and proceed to enforcement activities in Align</li> </ul> </li> <li>• If needed, issuing a formal RFI through Align</li> <li>• If necessary, reviewing associated evidence in the ERO SEL</li> </ul>
<p style="text-align: center;"><b>What should you stop doing?</b></p> <div style="text-align: center;"></div>	<ul style="list-style-type: none"> <li>• Following existing preliminary screen for U.S. jurisdictional noncompliance using existing tools (e.g., CITS, WebCDMS, etc.)</li> </ul>
<p style="text-align: center;"><b>What should you continue doing?</b></p> <div style="text-align: center;"></div>	<ul style="list-style-type: none"> <li>• Follow-up regularly with Registered Entities to ensure you have all required information to arrive at a recommendation for enforcement action</li> <li>• Evaluating the scope, risk impact, root cause, and mitigation of the issue to arrive at a recommendation for enforcement action</li> </ul> <p><b><u>For noncompliance submitted into CITS/CDMS</u></b></p> <ul style="list-style-type: none"> <li>• Following existing PNCR process using existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>• Reviewing evidence through legacy tools</li> </ul>

### Additional Details

- When you pass screening in Align it will notify NERC and the Registered Entity that a noncompliance exists, and that entity should retain all data and documents for noncompliance
- We will no longer use NERC violation IDs. In Align, each record will have a unique ID for the entire process
- In Align, the notice of noncompliance will also serve as the NPV

## 3. Enforcement Activities



### Overview



Submitting a PNCR will automatically create an Enforcement Action (EA) record in Align. The EA can then follow several different enforcement pathways. This section focuses on Violation Processing, Dismissals, Compliance Exceptions, Find, Fix & Track processes, and Settlement and Confirmed Violations processes.

To what level is my work impacted due to this change?

**Significant**

Start/Stop/Continue	
<p><b>What should you start doing?</b></p> 	<p><b><u>For noncompliance submitted into Align</u></b></p> <p><b><i>Violation Processing:</i></b></p> <ul style="list-style-type: none"> <li>• Reviewing risk assessment and analyzing circumstances of PNC in Align</li> <li>• Deciding disposition of PNC (e.g., CE, FFT, dismissal, etc.) in Align</li> <li>• Issuing NAVAPS in Align</li> <li>• Checking to see if Registered Entity has Contested the NAVAPS/NOCV in Align</li> <li>• If applicable, sending RFI to Registered Entity in Align</li> </ul> <p><b><i>Dismissals:</i></b></p> <ul style="list-style-type: none"> <li>• Confirming if record is Compliance Investigation in Align</li> <li>• If Compliance Investigation, asking NERC to complete review outside of Align</li> <li>• Determining type of dismissal and designating the record accordingly in Align</li> <li>• Sending dismissal letter to Registered Entity in Align</li> <li>• Closing record in Align</li> </ul> <p><b><i>Compliance Exception (CE) &amp; Find, Fix, Tack Processes:</i></b></p> <ul style="list-style-type: none"> <li>• Creating disposition record of CE type or FFT and providing rationale in Align</li> <li>• Sending CE or FFT letter to Registered Entity in Align</li> <li>• Sending CE or FFT to NERC for review in Align (if Entity does not opt-out)</li> <li>• Closing record upon completion of 60-day review period and mitigating activities or Mitigation Plan</li> </ul> <p><b><i>Settlement/Confirmed Violation Process</i></b></p> <ul style="list-style-type: none"> <li>• Issuing NAVAPS to Registered Entity in Align</li> <li>• Uploading executed settlement agreement in Align</li> <li>• Uploading NOP/SNOP, before submitting it to NERC for review, in Align</li> <li>• Marking the Settlement/confirmed violation complete in Align</li> <li>• Sending NOCV to Registered Entity in Align</li> <li>• Closing out Settlement/confirmed violation in Align, and sending a notice of completion to NERC and the Entity</li> <li>• If necessary, reviewing associated evidence in the ERO SEL</li> </ul>
<p><b>What should you stop doing?</b></p> 	<ul style="list-style-type: none"> <li>• N/A</li> </ul>

**What should you continue doing?**



- Using preexisting rationale and definitions to decide disposition
- Calculating the potential penalty and creating a draft settlement agreement in collaboration with the Registered Entity using existing processes and tools
- Coordinating regularly with Registered Entity contacts to work through Enforcement workflow
- Deciding if the disposition should be changed to a confirmed violation if Registered Entity does not agree to terms of settlement using existing processes and tools

**For noncompliance submitted into CITS/CDMS**

- Completing all Enforcement Activities (e.g., Violation Processing, Dismissals, CEs, FFTs, and Settlement/Confirmed violation) using existing tools (e.g., WebCDMS, CITS, etc.) and processes
- Reviewing evidence through legacy tools

**Additional Details**

- A CEA cannot issue any dismissal to a Compliance Investigation before NERC is able to review
- NERC does not need a notification of a dismissal; however, it should be visible to them upon login to the system (i.e., dashboard view)

## 4. Mitigation Plans & Mitigating Activities

**Overview**






The key process change in Mitigation is that the Registered Entity will submit mitigating activities instead of Mitigation Plans by default. If the mitigating activities needs to be converted to a plan, the CEA will make that conversion in Align.

The other change to the Mitigation workflow is that Align will replace existing methods of submission, review, and tracking. Registered Entities will need to stop using existing tools like webCDMS or CITS and stop any manual tracking of mitigation activities. Everything should be submitted, reviewed and tracked in Align.

To what level is my work impacted due to this change?

**Significant**



Start/Stop/Continue	
<p><b>What should you start doing?</b></p> 	<p><b><u>For noncompliance submitted into Align</u></b></p> <p><b><i>Mitigating Activities:</i></b></p> <ul style="list-style-type: none"> <li>• Reviewing mitigating activities in Align</li> <li>• If applicable, requesting revision of mitigating activities in Align</li> <li>• Accepting mitigating activities in Align</li> <li>• Accepting or verifying completion of mitigating activities in Align</li> <li>• If necessary, sending RFI to Registered Entity in Align</li> </ul> <p><b><i>Mitigation Plans:</i></b></p> <ul style="list-style-type: none"> <li>• If necessary, converting mitigating activities to Mitigation Plan from in Align</li> <li>• Reviewing Mitigation Plan to determine if it will be accepted in Align</li> <li>• If applicable, extending Mitigation Plan review period in Align</li> <li>• Accepting or rejecting Mitigation Plan in Align</li> <li>• Monitoring new facts and circumstances to determine if a Mitigation Plan may need to be revised in Align</li> <li>• If applicable, receiving Mitigation Plan revisions, after acceptance, from Registered Entities in Align</li> <li>• If necessary, reviewing associated evidence in the ERO SEL</li> </ul>
<p><b>What should you stop doing?</b></p> 	<p><b><i>Mitigating Activities:</i></b></p> <ul style="list-style-type: none"> <li>• Creating, reviewing, and rejecting or approving mitigating activities in existing tools (e.g., CITS, WebCDMS, etc.)</li> </ul> <p><b><i>Mitigation Plans:</i></b></p> <ul style="list-style-type: none"> <li>• Creating, reviewing, and rejecting or approving Mitigation Plans in existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>• Collecting evidence through legacy tools</li> </ul>
<p><b>What should you continue doing?</b></p> 	<ul style="list-style-type: none"> <li>• Coordinating regularly with your Registered Entity to help ensure mitigation activities and Mitigation Plan deadlines are met, and all necessary evidence is provided</li> </ul> <p><b><u>For noncompliance submitted into CITS/CDMS and non-U.S. Jurisdictional noncompliance</u></b></p> <ul style="list-style-type: none"> <li>• Creating, reviewing, and rejecting or approving mitigating activities in existing tools (e.g., CITS, WebCDMS, etc.)</li> </ul> <p><b><i>Mitigation Plans:</i></b></p> <ul style="list-style-type: none"> <li>• Creating, reviewing, and rejecting or approving Mitigation Plans in existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>• Collecting evidence through legacy tools</li> </ul>

### Additional Details

- Mitigating activities will be submitted by default with each PNC
- If mitigating activities need to be transitioned to a formal Mitigation Plan, the CEA will need to initiate the process in Align
- Non-US Jurisdiction Mitigation Plans do not go to FERC
- A Registered Entity may request the ability to revise their Mitigation Plan at any time by contacting the regional point of contact(s) outside of Align. The regional point of contact(s) will take action in Align to send back to the Entity for revision
  - The reason for requesting a revision may include expanding the scope of the PNC or Mitigation Plan due to new information being discovered. The CEA should determine if a revision is appropriate or if a new Self-Report should be created

## 5. Tracking Mitigation Plans

### Overview



Once a Mitigation Plan is submitted, the Registered Entity will begin tracking against the plan. They have the ability to update the actual completion date and upload evidence for verification from submission of plan through verification. At this point, you will begin monitoring progress of the Mitigation Plan in Align. After the Registered Entity certifies that their Mitigation Plan is complete, you can choose to accept, verify or reject the completion.

To what level is my work impacted due to this change?

**Moderate**



### Start/Stop/Continue

**What should you start doing?**







#### **For noncompliance submitted into Align**

- Reviewing the submitted Mitigation Plan and confirming the milestones and activities in Align
- If Milestone extension is requested, choosing to extend milestone completion date in Align
- If applicable, escalating the disposition path if the Registered Entity is not adhering to their Mitigation Plan in Align
- Reviewing evidence submitted with Mitigation Plan to verify completion in Align
- Verify that the completion date certified by the Registered Entity is accurate in Align
- If applicable, sending RFI to Registered Entity in Align
- If necessary, reviewing associated evidence in the ERO SEL





<p><b>What should you stop doing?</b></p> 	<ul style="list-style-type: none"> <li>N/A</li> </ul>
<p><b>What should you continue doing?</b></p> 	<ul style="list-style-type: none"> <li>Coordinate regularly with your Registered Entity to help ensure Mitigation Plan deadlines are met, and all necessary evidence is provided</li> </ul> <p><b><u>For noncompliance submitted into CITS/CDMS and non-U.S. Jurisdictional noncompliance</u></b></p> <ul style="list-style-type: none"> <li>Tracking Mitigation Plan milestone completion in existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>Sending requested information via email or secure file transfers</li> <li>Sending verification letter or notice of plan acceptance in existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>Continue collecting evidence through legacy tools</li> </ul>
<p><b>Additional Details</b></p>	
<ul style="list-style-type: none"> <li>The CEA has the option to escalate the disposition path if the Registered Entity is not adhering to their Mitigation Plan</li> <li>An officer, employee, attorney or other authorized representative at the Registered Entity must certify the completion of all activities laid out in the Mitigation Plan</li> </ul>	

## 6. Self-Certifications, PDS, TFEs, Compliance Audits, Spot Checks, Compliance Investigations, and Complaints

<p><b>Overview</b></p>	
	<p>The processes for Self-Certifications, Periodic Data Submittals (PDS), Technical Feasibility Exceptions (TFE), Compliance Audits, Spot Checks, Compliance Investigations, and Complaints will not change due to Align Release 1. Continue to use the current established process &amp; systems for receiving and responding to Self-Certifications, PDS, TFEs, Compliance Audits, Spot Checks, Compliance Investigations and triggering Technical Feasibility Exceptions and Complaints.</p>
<p>To what level is my work impacted due to this change? <span style="float: right;"><b>Low</b></span></p>	
<p><b>Start/Stop/Continue</b></p>	
<p><b>What should you start doing?</b></p> 	<ul style="list-style-type: none"> <li>Creating a PNC in Align if discovered through a Self-Certification, PDS, Compliance Audit, Spot Check, Compliance Investigation or Complaint</li> </ul>

<p><b>What should you stop doing?</b></p> 	<ul style="list-style-type: none"> <li>Processing PNCs in existing tools if discovered through Self-Certification, PDS, Compliance Audit, Spot Check, Compliance Investigation or Complaint in Align</li> </ul>
<p><b>What should you continue doing?</b></p> 	<ul style="list-style-type: none"> <li>Sending, receiving and responding to Self-Certifications, Periodic Data Submittals Self-Certification, PDS, Compliance Audit, Spot Check or Compliance Investigation using existing tools (e.g., CITS, WebCDMS, etc.)</li> <li>Documenting and tracking TFEs and Complaints using existing tools (e.g., CITS, WebCDMS, etc.)</li> </ul>
<p><b>Additional Details</b></p>	
<ul style="list-style-type: none"> <li>It is important to note that if a potential Non-Compliance (PNC) is the outcome of one of the above activities during Release 1, that PNC must be initiated in Align. Once new PNC is initiated, follow the new Align process for completion</li> </ul>	

## 7. Support Process

<p><b>Overview</b></p>	
	<p>Support for Align will follow the new ERO Enterprise Application Support Process. Support of enterprise applications, including Align, will follow a disciplined process to ensure requests are handled in a timely manner, and are prioritized according to business importance and criticality.</p>
<p>To what level is my work impacted due to this change? <span style="float: right;"><b>Low</b></span></p>	
<p><b>Start/Stop/Continue</b></p>	
<p><b>What should you start doing?</b></p> 	<ul style="list-style-type: none"> <li>Requesting and receiving support for the Align application and existing CMEP applications via a support request ticket (enabled by FootPrints) for noncompliance started in Align.</li> </ul>
<p><b>What should you stop doing?</b></p> 	<ul style="list-style-type: none"> <li>N/A</li> </ul>
<p><b>What should you continue doing?</b></p> 	<ul style="list-style-type: none"> <li>Requesting and receiving support for all existing CMEP applications using current processes and tools for noncompliance started in CITS/CDMS.</li> </ul>