

# Align: Start, Stop, Continue Guide

## NERC

Use this document to familiarize yourself with NERC Align process changes!

### Executive Summary

#### Overview



Align is a new software tool that supports 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 ERO 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.

It is important to note that Align Release 1 will utilize a phased launch approach with the initial two regions (Texas RE & MRO) going live in Align first. The remaining four regions will transition to Align 4 to 6 weeks after the initial Release 1 launch. During this brief interim period, **it is important to note that you will complete all monitoring, enforcement, and reporting functions using existing tools and processes for regions that have not transitioned to Align.**

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

**Moderate**





#### Additional Details

- The Align Release 1 Start, Stop, Continue Executive Summary provides only high-level information on process, terminology, and tool changes
- Please see the section below for detailed information on what processes will be completed in Align vs. existing tools
- Additionally, the NERC Align Release 1 Start, Stop, Continue Guide does not provide information on processes related to managing Registered Entities. For detailed information on these processes, please refer to the Regional Align Release 1 Start, Stop, Continue Guide





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. Standards




Overview	
	<p>Managing standards will be done directly in Align which is a fundamental shift for NERC. Additionally, all reporting related to standards will be driven by Align vs. CRATS.</p>
<p>To what level is my work impacted due to this change? <span style="float: right; color: yellow;"><b>Moderate</b></span></p>	
Start/Stop/Continue	
<p><b>What should you start doing?</b></p> <p style="text-align: center;"></p>	<ul style="list-style-type: none"> <li>Managing non-International Standards in Align</li> <li>Generating non-International Standard reports in Align</li> </ul>
<p><b>What should you stop doing?</b></p> <p style="text-align: center;"></p>	<ul style="list-style-type: none"> <li>Generating non-International Standard reports in CRATS</li> </ul>
<p><b>What should you continue doing?</b></p> <p style="text-align: center;"></p>	<ul style="list-style-type: none"> <li>Posting Standards Report to public website (daily integration)</li> <li>Managing International Standards and non-International Standards in CRATS (until Align Release 2)</li> <li>Generating International Standards reports in CRATS</li> </ul>

## 2. Self-Reporting & Self-Logging





Overview	
	<p>When a Registered Entity has identified a potential non-compliance (PNC), they will create the Self-Report or Self-Log in Align. Your action in this process is largely the same; you'll be notified when the PNC passes preliminary screen and will report to FERC.</p>
<p>To what level is my work impacted due to this change? <span style="float: right; color: green;">Low</span></p>	
Start/Stop/Continue	
<p><b>What should you start doing?</b></p> 	<ul style="list-style-type: none"> <li>Generating report of <b>new</b> PNCs to send to FERC in Align for U.S. registered Entities</li> </ul>
<p><b>What should you stop doing?</b></p> 	<ul style="list-style-type: none"> <li>Generating report of <b>new</b> PNCs to send to FERC in existing tools for U.S. registered Entities</li> </ul>
<p><b>What should you continue doing?</b></p> 	<ul style="list-style-type: none"> <li>Sending report of new PNCs to FERC using existing processes</li> <li>Continue to notify the relevant international organizations for non-U.S. noncompliance using existing processes</li> </ul>

## 3. Enforcement Activities

Overview	
	<p>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 Violations, Dismissals, Compliance Exceptions; Find, Fix &amp; Track processes; and Settlement and Confirmed Violations.</p>
<p>To what level is my work impacted due to this change? <span style="float: right; color: orange;">Moderate</span></p>	

Start/Stop/Continue	
<p><b>What should you start doing?</b></p> 	<p><b><u>For Noncompliance Started in Align</u></b></p> <p><b>Violation Processing:</b></p> <ul style="list-style-type: none"> <li>Viewing disposition and notification records that need to be reported to FERC (e.g., NAVAPS, Dismissals, CEs, FFTs, NOPs/SNOPs) in Align Dashboard</li> <li>Generating reports necessary for FERC reporting (e.g., NAVAPS, Dismissals, CE, FFTs, NOPs/SNOPs) in Align</li> </ul> <p><b>Compliance Exception (CE) &amp; Find, Fix, Track (FFT) Processes:</b></p> <ul style="list-style-type: none"> <li>Reviewing CE &amp; FFTs and determining if changes need to be made in Align</li> <li>If required, notifying CEA to issue RFI to Registered Entity in Align</li> <li>Accepting or rejecting CE &amp; FFTs in Align</li> </ul> <p><b>Settlement &amp; Confirmed Violation Process:</b></p> <ul style="list-style-type: none"> <li>Reviewing &amp; editing SNOP/NOP in Align</li> <li>Accepting or rejecting Settlement/Confirmed Violations in Align</li> <li>If necessary, request access to the ERO SEL to review evidence for oversight activities</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> 	<p><b><u>For noncompliance started in CITS and CDMS</u></b></p> <ul style="list-style-type: none"> <li>Communicating with FERC (e.g., sending NAVAPS, Notice of Dismissal, posting CEs or FFTs for given period, SNOP/NOP, etc.) using existing processes</li> <li>Reviewing Dismissals for Compliance Investigations using existing processes</li> <li>Completing the above Enforcement Activities (e.g., Violations Processing, Dismissals, CEs, FFTs, and Confirmed Violations) using existing tools (i.e., CRATS) and processes</li> <li>Reviewing evidence through legacy tools</li> </ul>
Additional Details	
<ul style="list-style-type: none"> <li>The FERC reporting Dashboard is a new feature in Align. All disposition and notification records that need to be reported to FERC will appear on the dashboard for noncompliance that started in Align.</li> </ul>	

## 4. Mitigation Process

Overview	
	<p>The key process change in Mitigation is that Registered Entities will submit mitigating activities instead of Mitigation Plans by default. If the mitigating activity needs to be converted to a plan, the CEA will inform the Registered Entity and the conversion can be made in Align.</p> <p>The other change to the Mitigation workflow is that Align will replace existing methods of submission, review, and tracking. Registered Entities &amp; Regions 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.</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> 	<p><b><u>For noncompliance started in Align</u></b></p> <ul style="list-style-type: none"> <li>Track progress of mitigating activities in Align</li> <li>Viewing Mitigation Plan in Align Dashboard</li> <li>Completing review of Mitigation Plan in Align</li> <li>If applicable, requesting revisions to Mitigation Plan in Align</li> <li>If applicable, extending review period in Align</li> <li>Approving or Rejecting Mitigation Plan in Align</li> <li>Generating reports necessary for FERC reporting in Align</li> <li>If necessary, request access to the ERO SEL to review evidence for oversight activities</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>Communicating with FERC (e.g., Mitigation Plan approvals, etc.) using existing processes</li> </ul> <p><b><u>For noncompliance started in CITS and CDMS and international noncompliance</u></b></p> <ul style="list-style-type: none"> <li>Completing the above mitigation process &amp; tracking activities using existing tools and processes</li> </ul>

### Additional Details

- Non-US Jurisdiction Mitigation Plans do not go to FERC
- The reason for requesting a revision may include expanding the scope of the Mitigation Plan due to new information being discovered

## 5. Self-Certification, Periodic Data Submittals, TFEs, Compliance Audits, Spot Checks, Compliance Investigations, and Complaints

### Overview



The process for Self-Certifications, Periodic Data Submittals (PDS), Technical Feasibility Exceptions (TFEs), Compliance Audits, Spot Checks, Compliance Investigations and Complaints **will not change due to Align Release 1**. Continue to use the current established processes & systems to complete these activities.

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

**Low**

### Start/Stop/Continue

**What should you start doing?**



- Initiating PNCs that are the outcome of a Self-Certification, PDS, Compliance Audit, Spot Check, Compliance Investigations, or Complaints in Align
- If necessary, request access to the ERO SEL to review evidence for oversight activities

**What should you stop doing?**



- Initiating PNCs that are the outcome of a Self-Certification, PDS, Compliance Audit, Spot Check, Compliance Investigations, or Complaints in CRATS

**What should you continue doing?**







- Perform all processes related to Self-Certifications, Periodic Data Submittals, and Technical Feasibility Exceptions using CRATS

### Additional Details

- 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 will be initiated in Align by the CEA. Once new PNC is initiated, follow the new Align process for completion

## 6. Support Process

Overview	
	<p>Support with 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>	
Start/Stop/Continue	
<p><b>What should you start doing?</b></p> <p style="text-align: center;"></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> <p style="text-align: center;"></p>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
<p><b>What should you continue doing?</b></p> <p style="text-align: center;"></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>