

**NERC**

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

# Align Release 2

## ERO Process Improvements Report

July 1, 2021

**RELIABILITY | ACCOUNTABILITY**



- Process harmonization efforts for the following business process areas
  - Cycle 4-Periodic Data Submittals, Technical Feasibility Exceptions, Self Certifications

Topic	Current State	Future State
<b>Self-Certs</b>	<ul style="list-style-type: none"> <li>Regions make use of both “traditional” and “guided” self-certs; application of each and tools used varies by region</li> <li>ROP language is based on “traditional” self-certs</li> <li>Self-cert forms vary in content and functionality</li> </ul>	<ul style="list-style-type: none"> <li>Establish a single self-cert process, removing the distinction between “guided” and “traditional” self-certs; Regions will have the flexibility to ask clarifying questions and request evidence at time of submission and anytime during the process</li> <li>Clean up ROP language to better reflect current processes</li> <li>Self-certs will be sent to registered entities as a common form containing applicable standards and requirements as defined by the CEA</li> </ul>
<b>TFE</b>	<ul style="list-style-type: none"> <li>Significant time and effort required to create reports for NERC and FERC</li> <li>Volume of TFEs continues to reduce over time due to revisions to standards</li> </ul>	<ul style="list-style-type: none"> <li>A single standardized form to facilitate easier NERC and FERC reporting</li> <li>Simplified TFE process to anticipate the future of TFEs</li> </ul>
<b>PDS</b>	<ul style="list-style-type: none"> <li>PDS’ for standards on the national schedule are submitted through a variety of tools</li> <li>Variety of templates used for PDS’</li> <li>Do not have a method for tracking a “no” or “not applicable” response to PDS as data, which causes extra work for entities and regions (creating, submitting, and reviewing blank spreadsheets/templates)</li> <li>No functionality to account for MRRE and Coordinated Oversight</li> </ul>	<ul style="list-style-type: none"> <li>Day 1 implementation will focus on standards where data is currently being submitted in CITS/CDMS; additional standards may be rolled into Align in the future</li> <li>PDS response templates will be standardized where feasible; to be explored further in design</li> <li>Create ability for entities to report “no” or “not applicable” so that it is easily visible/reportable, and can be tracked for future PDS requests to avoid duplicate requests to entities</li> <li>CEAs will be able to send a PDS to all entities for which they are the Lead Region</li> </ul>