

Align: Start, Stop, Continue Guide

Registered Entities

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

Executive Summary

Overview






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.

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

Start/Stop/Continue	
<p>What should you start doing?</p> 	<ul style="list-style-type: none"> Existing Registered Entities will maintain registration information (e.g., PCC/PCO/ACC contact changes, adding Registration Scopes, etc.) in both CORES (to feed Align) and in existing tools (e.g., WebCDMS, CITS) for the duration of the Align implementation For new Registered Entities, contact information and registration changes will be made in CORES and the regions will be responsible for updating contact information and registration in CITS, CDMS For existing entities, registration changes will be made in CORES and contact changes will be made in CITS or CDMS If your entity is approved for self-logging, coordinating self-logging activities/expectations with your regional entity point of contact(s) Performing your Self-Report process in Align Performing your enforcement activities (e.g., Violation Processing, Dismissals, CEs, FFTs, and Settlement/NOCV processes) in Align Performing your mitigation activities & Mitigation Plan processes, including
<p>What should you stop doing?</p> 	<p><u>For noncompliance that was submitted into CITS/CDMS</u></p> <ul style="list-style-type: none"> Performing your Self-Report process using existing tools (e.g., WebCDMS, CITS) Submitting evidence through legacy tools
<p>What should you continue doing?</p> 	<ul style="list-style-type: none"> Maintaining registration information (e.g., PCC changes, asset changes, etc.) in existing tools (E.g., WebCDMS, CITS) for the duration of the Align implementation Performing all processes related to Self-Certifications, Periodic Data Submittals, and Technical Feasibility Exceptions using existing tools Performing all processes related to Compliance Audits, Spot Checks, Compliance Investigations and Complaints using existing tools <p><u>For noncompliance that was submitted into CITS/CDMS</u></p> <ul style="list-style-type: none"> Performing your enforcement activities (e.g., Violation Processing, Dismissals, CEs, FFTs, and Settlement/NOCV) using existing tools (e.g., WebCDMS, CITS) Performing your mitigation activities & Mitigation Plan processes, including mitigation tracking, using existing tools (e.g., WebCDMS, CITS)
Additional Details	
<ul style="list-style-type: none"> 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 for Self-Log & Self-Report, Enforcement, Mitigation, Self-Certification, Periodic Data Submittals, TFEs, and Compliance processes 	

Impact Scale	
Significant	<ul style="list-style-type: none">• 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
Moderate	<ul style="list-style-type: none">• Several ways in which you do your jobs will change. You may have new work, requiring new skills that will potentially require some training
Low	<ul style="list-style-type: none">• Minimal changes to the way you do your jobs. Existing tools and processes will remain in place. Training not required

Detailed Guides

1. Self-Reporting & Self-Logging

Overview	
	<p>Creating a Self-Log or Self-Report are straightforward and familiar processes in Align. While the process and concepts are not changing much, there are a couple of key changes we need to highlight. One is that Align will replace all current methods of creating Self-Reports, and may also replace your current method of creating and submitting self-logs based on regional discretion. So, you'll need to stop submitting Self-Reports through webCDMS or CITS. If your entity is approved for self-logging, you will need either add Self-Log items directly into Align rather or you will continue to add them to a spreadsheet and submitting those to the CEA on a periodic basis. However all Self-Log items will ultimately be tracked and processed in Align. Please reach out to your regional point of contact(s) for additional guidance on how to submit Self-Logs.</p>
<p>To what level is my work impacted due to this change? Moderate</p>	
Start/Stop/Continue	
<p>What should you start doing?</p> 	<ul style="list-style-type: none"> • Creating Self-Reports in Align when you have identified a PNC • Adding mitigating activities and target completion dates to your Self-Report in Align (when applicable) • If required, submitting finding updates to Self-Report in Align • Submitting Self-Reports in Align • If your entity is approved for self-logging, coordinate self-logging activities/expectations with your regional entity point of contact(s) • Adding mitigating activities to your Self-Log in Align (when applicable)
<p>What should you stop doing?</p> 	<ul style="list-style-type: none"> • Creating Self-Reports in existing tools (e.g., CITS, CDMS, etc.) when you have identified a PNC • Adding mitigating activities to your Self-Report in existing tools (e.g., CITS, WebCDMS, etc.)
<p>What should you continue doing?</p> 	<ul style="list-style-type: none"> • Reporting PNCs as soon as they have been identified <p><u>For non-U.S. jurisdictional noncompliance</u></p> <ul style="list-style-type: none"> • Receiving notifications that Self-Log & Self-Report has been initiated in existing tools (e.g., CITS, WebCDMS, etc.) • Initiating preliminary screen process in existing tools (e.g., CITS, WebCDMS, etc.) • Receiving evidence through legacy tools

Additional Details

- Self-Reports & Self-Logs allow flexibility to add mitigating activities before or after you submit your initial report
- 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 performed by your CEA
- If your entity has not been vetted into the Self-Logging program, you will not have the ability to submit Self-Logs in Align; the vetting process is done outside of Align

2. 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, but do not have a major impact on the Registered Entities.

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

Low

Start/Stop/Continue

What should you start doing?



For noncompliance submitted into Align

- Receiving notification that additional information is required regarding PNC in Align
- Checking status of PNC in Align
- Responding to RFI requests in Align and submitting associated evidence requests in the ERO SEL

What should you stop doing?



- N/A



What should you continue doing?



For noncompliance submitted into CITS/CDMS

- Receiving notification that additional information is required regarding PNC in existing tools
- Uploading requested information and evidence in response to the RFI in existing tools

3. Enforcement Activities

Overview	
	<p>Once your Self-Report or Self-Log passes the Preliminary Screen, your CEA, along with NERC, will determine the appropriate dispositions. The enforcement process is in-depth, and numerous enforcement pathways exist. This section focuses on Violations Processing, Dismissals, Compliance Exceptions, Find, Fix & Track processes, and Settlement/NOCV processes.</p>
<p>To what level is my work impacted due to this change? Moderate</p>	
Start/Stop/Continue	
<p>What should you start doing?</p> <div style="text-align: center; margin-top: 10px;">  </div>	<p>For noncompliance submitted into Align</p> <p><i>Violation Processing:</i></p> <ul style="list-style-type: none"> If applicable, receiving RFI in Align If applicable, responding to RFI in Align and uploading associated evidence in the ERO SEL If applicable, receiving NAVAPS in Align If applicable, responding to NAVAPS within 30 days of issuance to contest the violation or proposed penalty in Align If applicable, working with CEA to resolve contestation in Align <p><i>Dismissals:</i></p> <ul style="list-style-type: none"> Receiving dismissal letter in Align <p><i>Compliance Exception (CE) and Find, Fix, Track Processes:</i></p> <ul style="list-style-type: none"> Receiving CE letter and FFT letter and affidavit in Align Completing all mitigation activities and documenting in Align prior to CE or FFT close <p><i>Settlement or NOCV Process</i></p> <ul style="list-style-type: none"> Receiving notification of completed NOCV in Align Receiving notification of executed settlement in Align If applicable, providing response to penalty determination in Align Completing all mitigation activities and documenting in Align prior to NOP/SNOP close Receiving the Notice of Completion of Enforcement Action in Align
<p>What should you stop doing?</p> <div style="text-align: center; margin-top: 10px;">  </div>	<ul style="list-style-type: none"> Receiving notifications, responding to RFIs, and receiving applicable letters for CEs, FFTs, and settlement/NOCV processes using existing tools (e.g., WebCDMS, CITS, etc.) and processes Submitting evidence through legacy tools

What should you continue doing?



- Coordinating regularly with CEA to work through Enforcement workflow

For noncompliance submitted into CITS/CDMS

- Receiving notifications, responding to RFIs, and receiving applicable letters for CEs, FFTs, and settlement/NOCV processes using existing tools (e.g., WebCDMS, CITS, etc.) and processes
- Submitting evidence through legacy tools

Additional Details

- CEA decides on a case by case basis if CE treatment should be pursued. This could be influenced by risk and compliance history
- The Registered Entity has the option to request settlement outside of Align at any time during violation processes

4. Mitigating Activities & Mitigation Plans

Overview



The key process change in mitigation is that you will submit mitigating activities instead of Mitigation Plans by default. If the mitigation activity needs to be converted to a plan, your CEA will let you know and make the conversion in Align.

The other change to the mitigation workflow is that Align will replace existing methods of submission, review and tracking. You 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

What should you start doing?



For noncompliance submitted into Align

Mitigating Activities:

- Creating mitigating activities and target completion dates in Align and submitting to your CEA in Align
- Revising mitigating activities in Align (if your CEA requests revisions)
- Resubmitting revised mitigating activities in Align
- If applicable, receiving and responding to RFIs in Align
- Uploading evidence for mitigating activities in the ERO SEL
- Receiving completion of mitigating activities from CEA in Align

Mitigation Plans:

- Receiving notification of mitigating activities transitioning to Mitigation Plan in Align
- Revising and submitting Mitigation Plan in Align
- Receiving notification for mitigation review extension (past 30 days) from your CEA in Align
- Revising Mitigation Plan with CEA-requested revisions in Align (even if CEA has already approved plan)
- Revising Mitigation Plan with NERC-requested revisions in Align
- Receiving notification that Mitigation Plan was accepted in Align

What should you stop doing?



- N/A

What should you continue doing?



- Coordinating regularly with your CEA to help ensure mitigating activities and Mitigation Plan deadlines are met, and all necessary evidence is provided

For noncompliance submitted into CITS/CDMS and non-U.S. Jurisdictional noncompliance

Mitigating Activities:

- Creating, reviewing, revising and submitting mitigating activities in existing tools (e.g., CITS, WebCDMS, etc.)





Mitigation Plans:

- Creating, reviewing, revising and submitting Mitigation Plans in existing tools (e.g., CITS, WebCDMS, etc.)

Additional Details

- Even in cases that do not require CEA verification of mitigating activities, you will still need to retain the evidence of completion until any applicable data holds expire
- All Mitigation Plans require action from your CEA. If deemed necessary, your CEA will convert mitigating activities to a Mitigation Plan
- CEAs must review Mitigation Plans within 30 days or notify you of an extension in Align

5. Tracking Mitigation Plans

Overview	
	<p>Once a Mitigation Plan is submitted, it is expected that you will begin tracking against the plan. You have the ability to update the actual completion date and upload evidence from submission of plan through verification. However, it is required that you track progress against your Mitigation Plan once Plan is approved.</p>
<p>To what level is my work impacted due to this change? Moderate</p>	
Start/Stop/Continue	
<p>What should you start doing?</p> 	<p><u>For noncompliance submitted into Align</u></p> <ul style="list-style-type: none"> • Tracking mitigation milestones that must be reached to complete Mitigation Plan in Align • Submitting milestone extension requests for Mitigation Plans in Align • Once all milestones are completed, submitting certification of completed Mitigation Plan from an officer, employee, attorney or other authorized representative in Align • If RFI is required: <ul style="list-style-type: none"> ○ Receiving RFI record from CEA and completing requested information in Align ○ Submitting completed RFI to CEA in Align and associated evidence in the ERO SEL
<p>What should you stop doing?</p> 	<ul style="list-style-type: none"> • N/A
<p>What should you continue doing?</p> 	<ul style="list-style-type: none"> • Coordinating regularly with your CEA to help ensure mitigation activities and Mitigation Plan deadlines are met, and all necessary evidence is provided <p><u>For noncompliance submitted into CITS/CDMS and non-U.S. Jurisdictional noncompliance</u></p> <ul style="list-style-type: none"> • Tracking mitigation milestone completion in existing tools (e.g., CITS, WebCDMS, etc.) • Sending requested information via email or secure file transfers • Requesting milestone extensions using existing process and tools (e.g., CITS, WebCDMS, etc.)

Additional Details

- Depending on the circumstances of your extension request, your CEA will either grant the request or not. If not, they will consider if the disposition should change. In cases such, the Mitigation Plan may need to be revised leading to revised actions or milestones.
- If your CEA deems your Mitigation Plan incomplete, they will reconsider if the disposition needs to be changed, if the Plan itself needs to be revised or if they need to send a Request for Information to fill in any gaps

6. Self-Certification, PDS, TFEs, Compliance Audit, Spot Check, Compliance Investigations, Complaints

Overview



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

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

Low

Start/Stop/Continue

What should you start doing?



- N/A

What should you stop doing?



- N/A

What should you continue doing?



- Performing all processes related to Self-Certifications, Periodic Data Submittals, and Technical Feasibility Exceptions using existing tools

Additional Details

- It is important to note that if a potential Non-Compliance (PNC) is the outcome of a new self-certification, PDS, or TFE during Release 1, that PNC will be initiated in Align by the CEA. Once new PNC is initiated, follow the new Align process, including submitting mitigation activities for completion.

7. Support Process

Overview



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.

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

Low

Start/Stop/Continue

What should you start doing?



- 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.

What should you stop doing?



- N/A

What should you continue doing?



- Requesting and receiving support for all existing CMEP applications using current processes and tools for noncompliance started in CITS/CDMS.