

# NERC

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

# ALIGN

# Align and Locker Update

## Stakeholder Meeting

### March 23, 2020

RELIABILITY | RESILIENCE | SECURITY



## **Welcome Address**

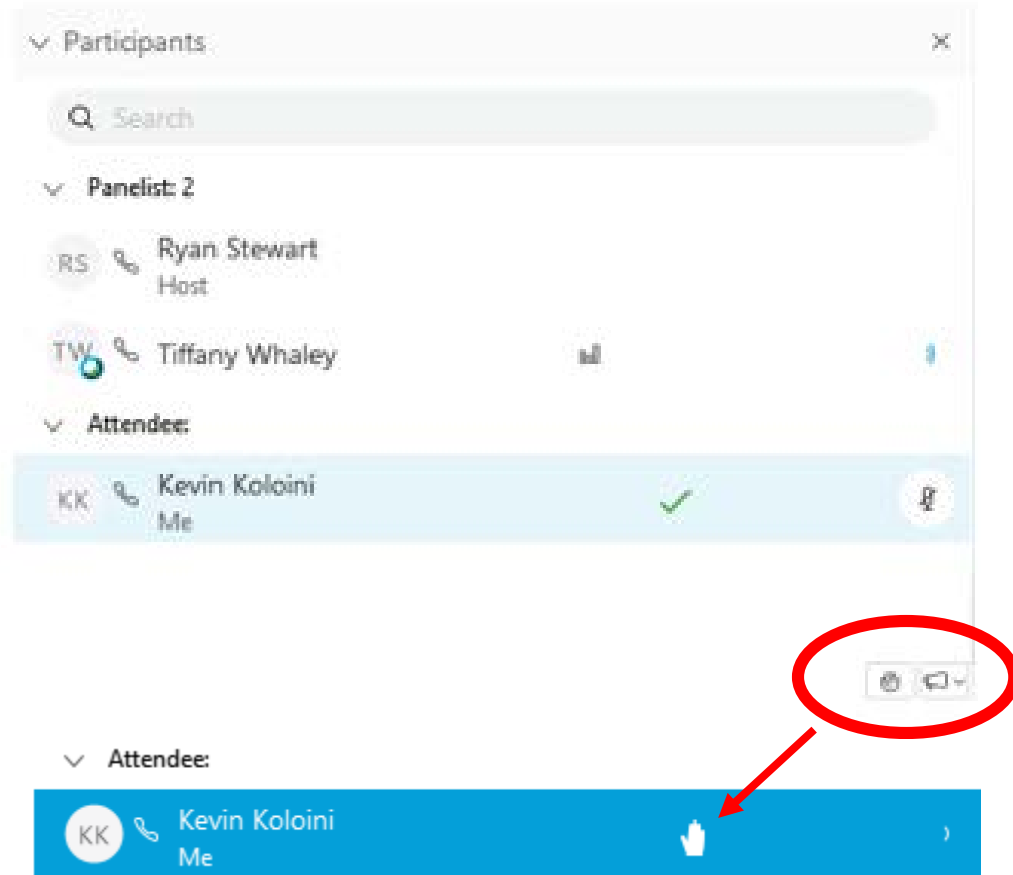
**Sara Patrick, MRO CEO and Executive Sponsor**

# Meeting Agenda and Etiquette

**Mechelle Thomas**

- Welcome to the Align and Locker WebEx Meeting
- Please note that you were muted upon entry to this meeting
  - You will not be able to unmute yourself during this call
- Please use the raised hand feature to alert the host that you have a question and/or comment
  - The host will unmute you and you will then be able to proceed

- Using the Participant Interface
  - Select the hand or the speakerphone drop down
- Hand options
  - Raise or lower hand
- Speakerphone drop down



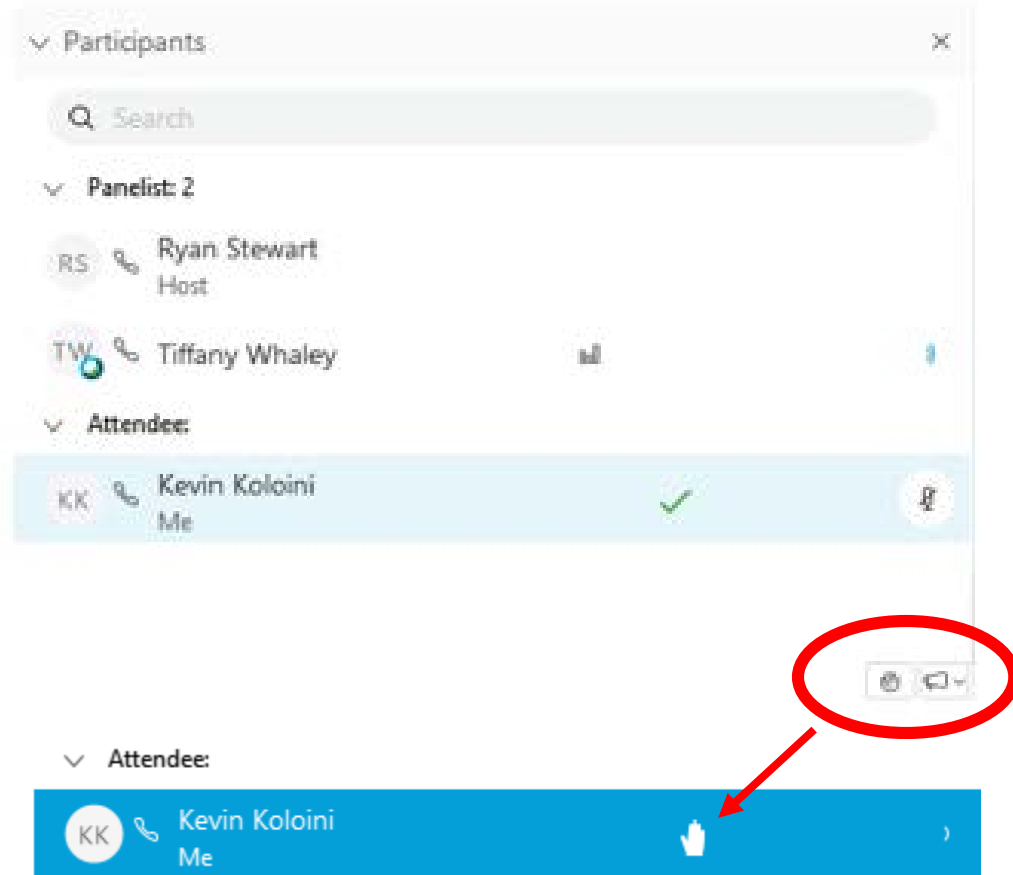
- **Welcome Address– Sara Patrick**
- **Overview – Recap and Current Events – Mechelle Thomas, Steve Noess and Ed Kichline**
- **Timelines – Dee Humphries**
  - Align Release 1 – Go Live\*
  - Implementing Entity Locker
- **Process Overview-Enforcement – Ed Kichline**
- **Release 1 Walkthrough – Align and the Locker – Andy Rodriquez**
- **Locker Functional Criteria – Andy Rodriquez**
- **Align Webinar FAQs\* – ERO Enterprise Team**
  - Clarification to Published Responses
- **Additional Questions**
- **Align Webinar FAQs\* – ERO Enterprise Team**
  - Clarification to Published Responses
  - Additional Questions
- **Next Steps**

• **Wrap Up**



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## **Project Recap and Current Events**

**Mechelle Thomas**  
**Steve Noess**  
**Ed Kichline**

- Formal and informal stakeholder interactions and outreach.
- Pre-locker Release 1 harmonization activities (does not include future Releases).
- Selection of vendor for locker implementation.
- Discussions with FERC on Align and lockers.

- ERO Enterprise evidence locker is in design and will soon be under construction.
- Planning for stakeholder engagement for user acceptance testing.
- Planning for go live in Q4 2020/Q1 2021 with two pilot Regions (i.e., MRO and Texas RE) with select registered entities.
- Regional subject matter experts (SMEs) are validating Release 1 and data elements
- Training materials (i.e., videos, user guide, and quick reference cards) are under construction

- Release 1 business processes require re-harmonization activities to incorporate lockers.
- Release 2 and Release 3 harmonization activities (late 2020 or early 2021).
- Locker functional criteria to registered entities (early April 2020).
- Finalize evidence locker design and build (Q3-Q4 2020).
- ERO Enterprise CMEP documentation enhancement training (on-going webinar and Q4 face-to-face training).
- Announce a training schedule
- Finalize go-live and rollout schedule

- All registered entity-provided evidence, unless prohibited by a standard, will go into the registered entity or ERO Enterprise locker
  - All registered entity lockers must meet ERO Enterprise-developed criteria for functionality, access, etc.
- ERO Enterprise workflow and work products will be in the ERO Enterprise Align tool.
- The ERO Enterprise will enhance work products (e.g., working papers) to support conclusions without the need to store data for extended periods, minimizing data protection risk.

**NOTE: The Align team will achieve this through training, guidance, oversight activities, and other outreach.**

- The ERO Enterprise or registered entity locker will serve as the primary means to obtain compliance monitoring and enforcement evidence, both sensitive and non-sensitive.
- The ERO Enterprise locker will include a policy that will destroy evidence: 1) after the compliance monitoring engagement is complete, or 2) after FERC's review of the enforcement action is complete.

ITEMS AND WORK PAPERS IN ALIGN	NOTES
IRA Questionnaires	Sensitive information from registered entity should be uploaded in locker
IRA and COP work papers	
IRA and COP Summary	
RFIs	Sensitive information from registered entity should be uploaded in locker
RSAWs (with Auditor Notes, including Internal Controls notes)	
Preliminary Finding and Risk Harm Assessment	
Audit Report	
Self-Certification	Associated evidence in locker
Periodic Data Submittal	

Note: ERO Enterprise information will not reproduce sensitive content from the evidence lockers.

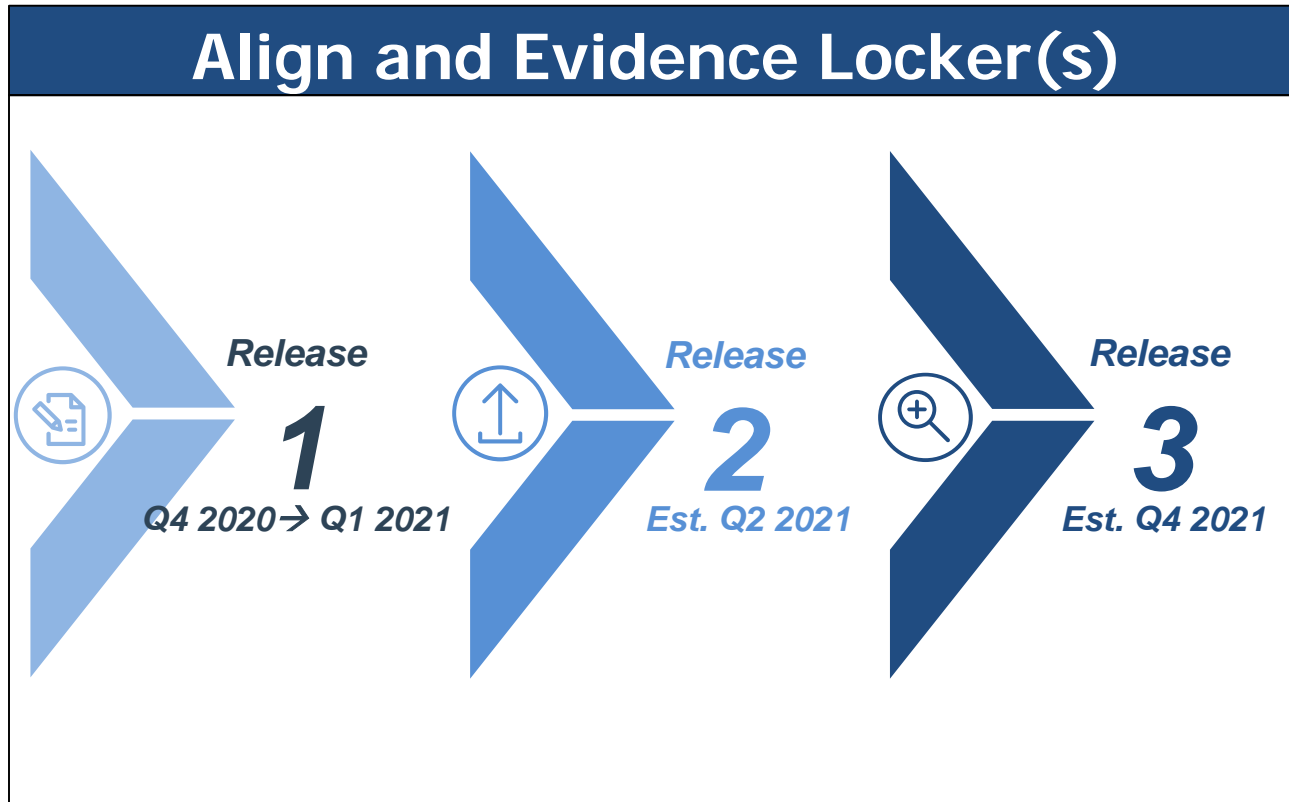
ITEMS AND WORK PAPERS IN ALIGN	NOTES
Self-Reports	Associated evidence in locker
Mitigation Plans	Sensitive details in locker
Mitigation review work papers, including verification	
Settlement Agreement, Notice of Confirmed Violation, Notice of Alleged Violation and Proposed Penalty or Sanction	
Noncompliance Review work papers	
Compliance Exception or FFT Notification Letter	
Filings with FERC, including Notices of Penalty, Compliance Exceptions, and FFTs	Filings may be prepared in Align, but filed through existing mechanisms outside of Align

Note: ERO Enterprise information will not reproduce sensitive content from the evidence lockers.



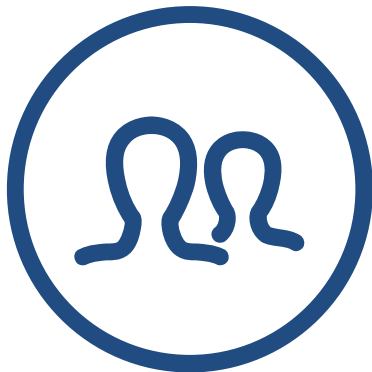
# Align Release 1 Timelines

Dee Humphries



## Stakeholder Group

### Registered Entities



## Release 1 Functionality

- Create and submit Self-Reports and Self-Logs
- Create and manage mitigating activities (informal) and Mitigation Plans (formal)
- View and track open Enforcement Actions (EAs) resulting from all monitoring methods
- Receive and respond to Requests for Information (RFIs)
- Receive notifications and view dashboards on new/open action items
- Generate report of standards and requirements applicable to your entity
- Manage user access for your specific entity
- Manage evidence supporting R1 functionality securely via separate Evidence Locker(s)

## Stakeholder Group

### Regional Entities



## Release 1 Functionality

- Receive Self-Reports and Self-Logs from entities
- Manually create findings that result from any monitoring method (i.e., audits, spot checks, investigations, periodic data submittals, self-certifications, complaints)
- Perform preliminary screens, PNC reviews, and disposition determinations for each PNC/EA
- Send and received responses to RFIs
- Trigger notifications such as NAVAPS, NOCV, CE Letter, FFT Letter, and Settlement Agreements
- Receive, review, and approve mitigating activities (informal) and Mitigation Plans (formal)
- Receive notifications and view dashboards on new/open action items
- Generate report of standards and requirements applicable to a registered entity
- View/analyze evidence supporting R1 functionality securely via separate Evidence Locker(s)

## Release 2 Functionality Est. Q2 2021

- Technical Feasibility Exceptions (TFEs)
- Periodic Data Submittals
- Self-Certifications
- Additional enhancements identified from R1 as needed
- Expand use of Evidence Lockers to include evidence submitted for these activities

Note: The monitoring methods above will be managed in existing systems during the gap between R1 and R2

## Release 3 Functionality Est. Q4 2021

- Compliance Planning (i.e., Risk, CMEP Implementation Plan, Inherent Risk Assessment, Internal Controls Evaluation, Compliance Oversight Plan)
- Compliance Audit
- Spot Check
- Compliance Investigations
- Complaints
- Expand use of evidence lockers to include evidence submitted for these activities

# Release 1 Process Overview for Registered Entities

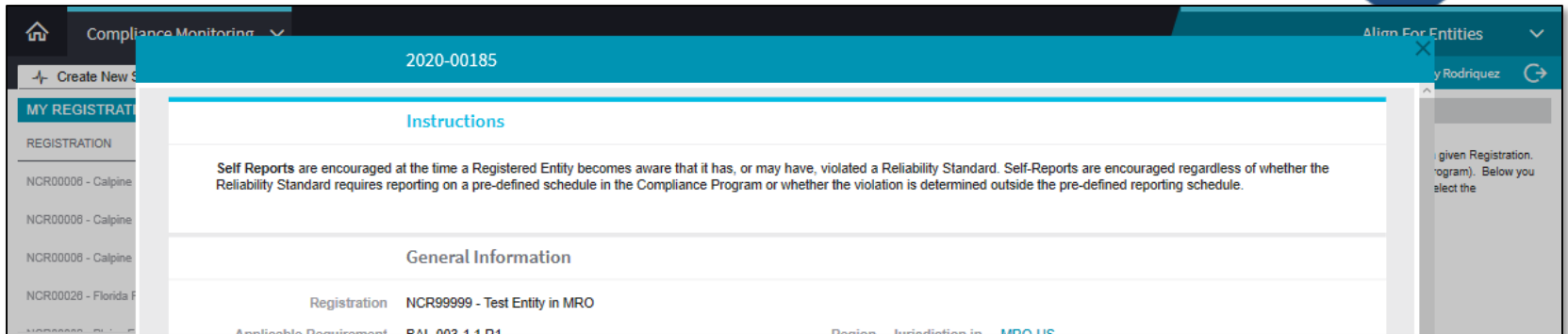
**Ed Kichline**

# Release 1 Walkthrough Self-Report Process with Align and the Locker

**Andy Rodriguez**

1. Go to the “Compliance Monitoring” section of Align and write and save your draft Self-Report
2. When you open your Self-Report to prepare for submission, Align will give you a Locker Number to use with that Self-Report
3. If you need to provide a file, log in to the Locker
4. Provide the Locker Number
5. Upload your file(s) to the Locker
6. Submit your Self-Report





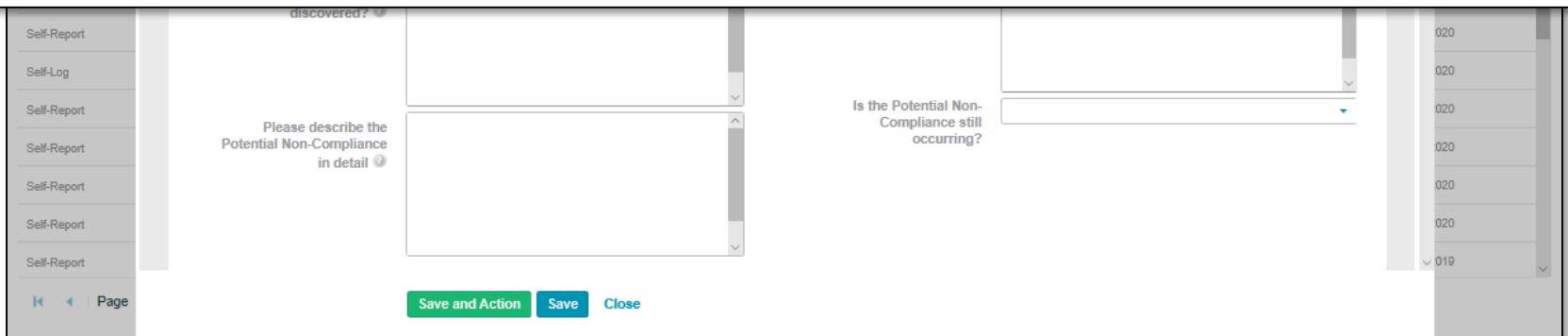
### Evidence and Attachments

#### Secure Evidence Locker Instructions

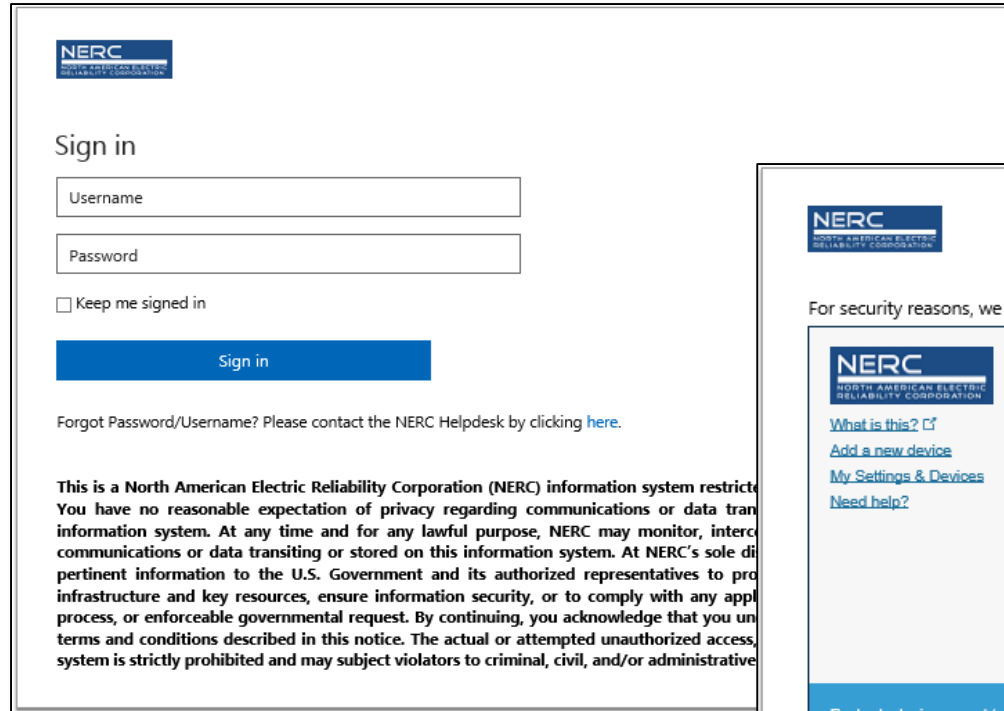
Provide Evidence or Attachments related to this Self Report via Secure Evidence Locker with the following number:

**2020-00185**

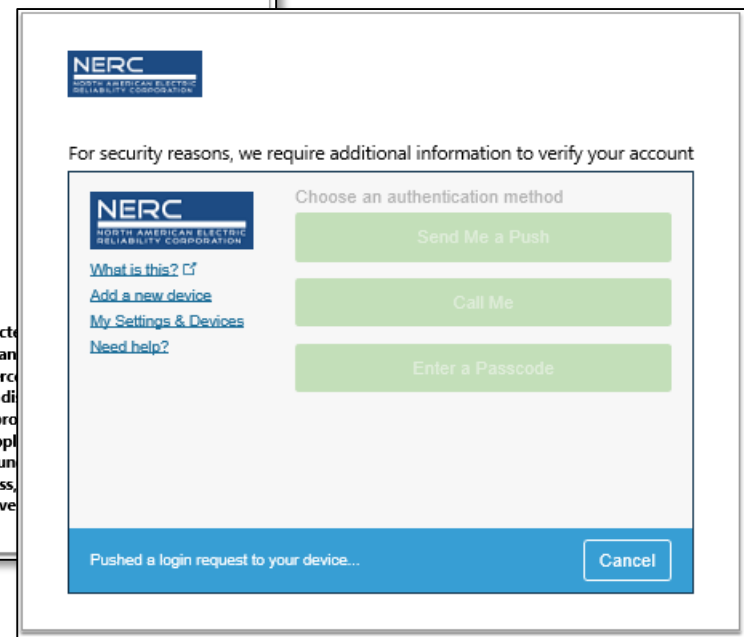
If you are hosting your own Secure Evidence Locker, please provide a hyperlink to your locker in the comment section above.



- User will log into the Evidence Locker through a URL (e.g. <https://EROLocker.nerc.com>) and be authenticated using your ERO Portal account with MFA:



The screenshot shows the NERC Sign in page. At the top left is the NERC logo. Below it is the text "Sign in". There are two input fields: "Username" and "Password". Below the password field is a checkbox labeled "Keep me signed in". A blue "Sign in" button is positioned below the checkbox. At the bottom of the page, there is a link: "Forgot Password/Username? Please contact the NERC Helpdesk by clicking [here](#)."



The screenshot shows the NERC MFA verification page. At the top left is the NERC logo. Below it is the text: "For security reasons, we require additional information to verify your account". There is a section titled "Choose an authentication method" with three green buttons: "Send Me a Push", "Call Me", and "Enter a Passcode". On the left side of this section, there are links: "What is this? ⓘ", "Add a new device", "My Settings & Devices", and "Need help?". At the bottom of the page, there is a blue bar with the text "Pushed a login request to your device..." and a "Cancel" button.

**NERC**  
NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

**ERO Enterprise  
Secure Evidence Locker**

Locker Reference Number

Evidence.pdf	137.61 KB	
Evidence2.pdf	277.23 KB	

Logged in as: Andy Rodriguez

**CONCEPTUAL MOCK-UP**

1. RFIs appear in your “My Align” dashboard
2. Read the RFI in Align
3. The RFI will include a Locker Number for you to use
4. If you need to provide a file, log in to the Locker
5. Provide the Locker Number
6. Upload your file(s) to the Locker
7. Submit your response to the RFI in Align. This will remove the RFI from your “My Align” dashboard. You will still be able to see the RFI from the Finding or Mitigation to which it is related.

2019-00408
✕

2019-00408 | 20-000237-R
✕

<b>Original Finding</b>	2019-00408	
<b>Requestor</b>	Andy Rodriguez	<b>Respondent Contact</b> <span style="border: 1px solid #ccc; padding: 2px;">NCR00086 Editor 2 Boise-KI ▾</span>
<b>Requestor Comments</b>	TEST TEST TEST	<b>Respondent Comments</b>
<b>Requestor Attachments</b>		
<b>Request Sent On</b>	March 19, 2020	
<b>Response Due By</b>	April 18, 2020	

## Evidence and Attachments

### Secure Evidence Locker Instructions

Provide Evidence or Attachments related to this Request via Secure Evidence Locker with the following number:

**2019-00408\_20-000237-R**

If you are hosting your own Secure Evidence Locker, please provide a hyperlink to your locker in the comment section above.

### Action

**Action** Acknowledge/Respond

Save and Action will acknowledge receipt of this Request and send back any response you have provided. Save will

1. Go to the “Mitigation Management” section of Align, then “My Draft Mitigations,” and edit your draft Mitigating Activities (or Mitigation Plan)
2. The Mitigation (and each Milestone) will have a Locker Number than can be used to upload a file
3. If you need to provide a file, log in to the Locker
4. Provide the Locker Number
5. Upload your file(s) to the Locker
6. When ready, submit your Mitigation for Regional Entity review

2020-00265
✕

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### General Information

<b>Type</b>	Mitigating Activities	<b>Related PNC</b>	2020-00265	<b>CEA</b>	<b>WECC</b>
<b>Registration</b>	NCR00086 - Boise-Kuna Irrigation District in WECC				
<b>Applicable Requirement</b>	FAC-003-4 R3.	<b>Registered Entity Contact</b>	Please provide a point of contact for this mitigation.		
<b>Applicable Part(s)</b>	FAC-003-4 R3. Part 1.; FAC-003-4 R3. Part 2.				
<b>Applicable Reliability Function(s)</b>	GO				

<input type="checkbox"/>	FIRST NAME	LAST NAME
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### Evidence and Attachments

Secure Evidence Locker Instructions

Provide Evidence or Attachments related to this Mitigation via Secure Evidence Locker with the following number:  
**2020-00185-M**

If you are hosting your own Secure Evidence Locker, please provide a hyperlink to your Locker in the comment section above.

**Instructions**

**2020-00185-M**

If you are hosting your own Data Locker, please provide a hyperlink to your locker in the comment section above.

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### Mitigation Milestones

<input type="checkbox"/>	MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	ACTUAL COMPLETION DATE
<input type="checkbox"/>					

Save and Action
Save
Close

1. Go to the “Mitigation Management” section of Align, then “My Active Mitigations,” and edit your draft Mitigating Activities (or Mitigation Plan)
2. The Mitigation and each Milestone will have a Locker Number that can be used to upload a file
3. If you need to provide a file, log in to the Locker
4. Provide the Locker Number
5. Upload your file(s) to the Locker
6. When ready, submit your Mitigation for Regional Entity verification



Milestone 2020-000286

### Milestone Information

Type of Milestone Task Corrective Control

### Evidence and Attachments

#### Secure Evidence Locker Instructions

Provide Evidence or Attachments related to this Milestone via Secure Evidence Locker with the following number:

**2020-0267-M\_2020-000293-MS**

If you are hosting your own Secure Evidence Locker, please provide a hyperlink to your locker in the comment section above.

#### Data Locker Instructions

Provide Evidence or Attachments related to this Milestone via Secure Evidence Locker with the following number:

**2020-0267-M\_2020-000293-MS**

If you are hosting your own Secure Evidence Locker, please provide a hyperlink to your locker in the comment section above.

2020-000286 FORM: RegMIAActEdit

Save and Action

Save

Close

# Entity Locker Functional Criteria

**Andy Rodriquez**

# Align Webinar FAQs

**ERO Enterprise Team**



# Questions and Answers