Align Release Notes

Release 4.5.1 Deployed April 18th, 2023

Background

Align and the Secure Evidence Locker (SEL) are tools used by NERC, Regional Entities, and registered entities in the conduct of the ERO Enterprise Compliance Monitoring and Enforcement Program (CMEP). Initial training and training materials have been offered throughout the initial deployment of functionality (Releases 1, 2, 3, 4.0, and 4.5). Ongoing maintenance and enhancements to Align and the SEL (CMEP tools) will occur as needed to assure effective implementation of the CMEP. Maintenance may include modifications to correct existing objects, notifications, records, workflows, etc. Enhancements may include new or improved functionality, workflows, reports, etc. These changes are expected as these CMEP tools are adjusted from their initial deployment to provide additional user functionality, efficiency, and enhancements to usability.

Purpose

As changes are implemented to the CMEP tools, training and training materials provided during initial deployment may no longer be accurate. As part of an effective communication plan and to assure the effectiveness of user training, NERC is providing detailed release notes in this report. These release notes include detailed information regarding what features are changing or being added, what users are impacted by the changes, and if current training materials are impacted and have been updated. Users are encouraged to familiarize themselves with any changes that impact features or workflows regularly used.

Terminology

Ongoing maintenance and enhancement of the CMEP Tools is conducted using an adaptive and iterative software development process. Terminology used within this document may refer to various processes most users may be unfamiliar with.

CEA: Compliance Enforcement Authority

COP: Compliance Oversight Plan

IRA: Inherent Risk Assessment

Module: Used to refer to a set of features used within Align. As shown in *Figure 1*, each item that can be selected from the My Align drop-down menu is a Module. *Example: Risk and Planning*



Figure 1: My Align Drop-Down Menu

User Story #: As shown in *Figure 2*, a unique number is used by the developers, NERC IT, and testers when referencing discrete changes. This number is used to aggregate all details, testing, and development information regarding a specific change. This number is not used by most CMEP tool users and users are not expected to become familiar or track these numbers. These numbers are provided for transparency purposes regarding changes and change controls. However, users may leverage these numbers to facilitate any follow up discussion, troubleshooting, testing, or IT support ticket details.



Figure 2: Elements of a User Story

Audit and Spot Check Module

User Story 11274

Description of Issue: CA2.4 - Requirements in scope MUST be related to specific entity.

Users Affected: CEA and Registered entities

Description of Change: Compliance monitoring engagements with multiple registered entities and differences in Reliability Standard requirements in scope show requirements by entity. Both the CEA and registered entities will see a change to the Working Papers tab (as shown in *Figure 3*). Registered entities users will only be able to view or modify working papers that they have access to.

Working Papers	3		
SUBJECT	ASSIGNED TEAM MEMBERS	RSAW STATUS	REVIEW STATUS
EOP-008-2 R1. for	Assign Team Member	Not Started	Not Started
EOP-008-2 R2. for	Assign Team Member	Not Started	Not Started
EOP-008-2 R4. for	Assign Team Member	Not Started	Not Started
EOP-008-2 R5. for	Assign Team Member	Not Started	Not Started
EOP-008-2 R1. for	Assign Team Member	Not Started	Not Started
EOP-008-2 R2. for	Assign Team Member	Not Started	Not Started



SEL	ECT STANDARDS AND	REQUIRE	MENTS
	STANDARD/REQUIREME	RELATED	REGISTRATIONS
	CIP-002-5.1a R1.	NCR	in
	CIP-002-5.1a R1.	NCR	in
	CIP-002-5.1a R2.	NCR	in
	CIP-002-5.1a R2.	NCR	in
	CIP-003-8 R1.	NCR	in
	CIP-003-8 R1.	NCR	in
	CIP-003-8 R2.	NCR	in
	CIP-003-8 R2.	NCR	in
K	Page 1 of 3	3	I Ø

Figure 4: Example of Requirement Selection in Coordinated Oversight

For the CEA: relating requirements to an engagement are done for each registered entity and requirement. See example in *Figure 4*.

<u>Training Materials Modified</u>: Registered Entity Release 3 User Guide - page 9; CEA Release 3 User Guide – page 29

<u>Description of Issue</u>: AUDIT - The "ANP Visibility Date" needs to be auto populated with the "ANP Deadline Date" or at minimum not allow to be submitted as blank.

Users Affected: CEA

<u>Description of Change</u>: After creating a monitoring engagement from a scheduled engagement, the Audit Notification Package Visibility Date will auto-populate based on the ANP Deadline Date. Validation will now prevent the ANP from being sent without a visibility date.

Training Materials Modified: None

User Story 15393

<u>Description of Issue</u>: Internal Control Assessments - V3 display issue. When CEA users would open an Internal Controls Assessment and relating requirements, there was a display issue whereby users could not effectively filter the requirement list and make selections.

Users Affected: CEA

<u>Description of Change</u>: The new UI was modified to move the filtering option within the window. The filter option is easier to view and locate within the window.

Compliance Oversight Plan Module

User Story 10971

<u>Description of Issue</u>: COP30 - Add warning text prior to cancel/delete of COP, COP CO

Users Affected: CEA

Description of Change: Text has

Figure 5: Move to Cancel Compliance Oversight Plan

been added below the "Move to Cancel" option within a Compliance Oversight Plan record to warn against accidental selection.

Training Materials Modified: None

User Story 11016

Description of Issue: COP1.20 - Export Applicable Standards and Requirements tab from COP record

Users Affected: CEA

<u>Description of Change</u>: A link has been added to export the full table from the Applicable Standards and Requirements tab of the Compliance Oversight Plan.

Training Materials Modified: None

User Story 15391

<u>Description of Issue</u>: COP - Null ratings create record issue. Priority rating numbers are used within the Risk Category tab of the Compliance Oversight Plan record. The ratings can be clicked to open a mini portlet for additional information related to the entity. If the CEA updated data within a Risk Category for an entity and did not select a value for the priority, the null value meant there was no link to click to reopen the mini portlet.

Users Affected: CEA

<u>Description of Change</u>: Null ratings now populate within the record with a dash so the mini portlet can be re-opened.

<u>Description of Issue</u>: COP report section not generating. The COP Report Narrative field in the Compliance Oversight Plan record was not correctly generating within the Compliance Oversight Plan Report.

Users Affected: CEA

<u>Description of Change</u>: This section will now show within a COP report.

Enforcement Action and Disposition Module

User Story 7776

<u>Description of Issue</u>: When relating the CE object to an EA, the drop down list includes EAs from all registrations. And it seems I can add them without an error. Ideally, the drop down should only include EAs for the applicable entity.

Users Affected: CEA

<u>Description of Change</u>: In the Enforcement Processing Module, on the Active Dispositions tab, the CEA has the ability to relate more Open Enforcement Actions (OEA) to a single Disposition. This change adds a control to ensure that the CEA can only select OEAs for the same registered entity registration. This control was added on the Active Disposition form, under the Related EAs section.

<u>Training Materials Modified</u>: N/A – no updates, this is just adding a control. There are no updates to training materials.

User Story 12895

Description of Issue: Filings Update

Users Affected: CEA

<u>Description of Change</u>: In the Enforcement Processing Module, on the Filings tab, NERC has the ability to create Filing records. This change adds a control to ensure that NERC can only include dispositions that relate to registered entities that are in the US jurisdiction only, no Canadian registrations. This control was added on the Filing form, under the Included Dispositions section.

<u>Training Materials Modified</u>: N/A – no updates, this is just adding a control. There are no updates to training materials.

User Story 9329

<u>Description of Issue</u>: Enforcement Action (EA) - Add final filing fields to EA so that NERC can eventually run reports from Align.

Users Affected: CEA

<u>Description of Change</u>: In the Enforcement Processing Module, on the Enforcement Action form, a new section was added to the form entitled "Filing Information." This new section has four text boxes to

capture the descriptive fields used for Compliance Exceptions; Find, Fix, Track; and Spreadsheet Notices of Penalty: Final Description, Final Risk Assessment, Final Mitigation, and Compliance History/Other Factors.

	Filing Information	1
Final Description		
Final Risk Assessment		
Final Mitigation	4	
Compliance History/Other Factors		

Figure 6: Filing Information Form

In the Enforcement Processing Module, the CEA has the ability to edit the language included on the Enforcement Action form up until the point NERC Approves the Disposition for filing. After NERC approves the Disposition, the Enforcement Action form changes to read-only mode. However, the CEA has noted that there is a need to provide edits on the Enforcement Action form while the Dispositions is Pending Closure. This change allows the CEA to continue to edit the Enforcement Action form while the Disposition is in Pending Closures.

Training Materials Modified:

- <u>CEA UserGuide.pdf (nerc.com)</u> potential update show the new screenshot of sections on slide 45
- Potential update to video around 1m5s when walking through the sections and expanding them.
 - Video CEA12)Enforcement Processing Introductions

User Story 10306

Description of Issue: Fix misspelling on Create Finding screen in Entity view.

Users Affected: Registered Entities

<u>Description of Change</u>: This change will correct a spelling error on the Self-Report and Self-Log form. The misspelled word (remediate) is under the "Mitigation Information (optional –click to expand)" section. This change will correct the word to remediate.

"If possible, and without delaying the Self-Report, a Self-Report may include the actions that have been taken or will be taken to remediate and mitigate the violation."

<u>Training Materials Modified</u>: N/A – no training materials need to be modified as a result of this change.

User Story 12693

Description of Issue: FINDINGS: Audit finding number is not displaying correctly.

Users Affected: All users.

<u>Description of Change</u>: This change will correct the portlets for all users to view the finding created in the Audit module to be filtered by the Audit Finding ID. For the findings created in the Audit module, there is an Audit Finding ID where the number after the dash starts with a 5 (ex. 2021-50001) and a Violation Finding ID (ex. 2021-00002). This change will ensure that what the user sees in the portlet, filters on in the portlet, and sees on the export results all show the Audit Finding ID.

<u>Training Materials Modified</u>: N/A – no training materials need to be modified as a result of this change.

User Story 16702

Description of Issue: FERC FILINGS tab - Need an export button on FERC Filings portlet

Users Affected: NERC

<u>Description of Change</u>: An export button was added to the FERC Filings portlet to allow the export of Filing information.

<u>Training Materials Modified</u>: N/A – no training materials need to be modified as a result of this change.

Inherent Risk Assessment Module

User Story 15170

<u>Description of Issue</u>: IRA - Newly reassigned resource name does not show in the portlet unless the portlet is updated and reopened. When the entity first deselects the prepopulated resource from the assignment and links a different resource, that resource name does not show in the portlet unless the portlet is updated and reopened. The record appears to be linked but it doesn't show until closed/reopened so It's not clear to the entity that the name is linked.

Users Affected: Registered Entities

<u>Description of Change</u>: Entity users will now see the assigned resources area automatically show the changes to assigned users without needing to close and reopen the window.

Training Materials Modified: None

User Story 15172

<u>Description of Issue</u>: IRA - After making an assignment, the IRA record does not immediately update to show the change. Entities reported that it seemed they needed to go through the risk factor assignment finalization twice for it to take. There was also no refresh button within the risk factor portlet, so the entity needs to completely update/close the record and reopen just to show the assignment take place.

0 Be advised: when making assignments below, please only click once and allow the system a short time to respond. Clicking multiple times will create multiple versions of the questions.	5
RISK FACTOR QUESTIONS	

Figure 7: Warning Notice to Limit Duplication

Users Affected: Registered Entities

<u>Description of Change</u>: Help text has been added reminding users to only make assignments once to prevent multiple responses for each risk factor from being created.

Training Materials Modified: None

User Story 15174

<u>Description of Issue</u>: IRA - The ERPQ and associated assignments were staying on the user's MyAlign dashboard after an IRA (and associated IRA questionnaire) was cancelled.

Users Affected: Registered Entities

<u>Description of Change</u>: The ERPQ task now clears from the MyAlign dashboard for cancelled IRAs for assigned registered entity users.

Training Materials Modified: None

User Story 15398

<u>Description of Issue</u>: IRA - Risk Factor ratings drop down option modification. CEA users do not need multiple options for "Not Applicable" for each risk factor.

Users Affected: CEA

<u>Description of Change</u>: The drop-down list for each risk factor now only includes one option for Not Applicable. Users may add specific information as text within the justification field.

Training Materials Modified: None

User Story 15415

<u>Description of Issue</u>: IRA Risk Factors in Prod - Correction needed to risk factors and the associated Standard requirement mapping.

Users Affected: CEA

Description of Change: Risk factor requirement mapping was updated.

Training Materials Modified: None

User Story 15416

<u>Description of Issue</u>: IRA - Entities were seeing Risk Factors questions for risk factors that did not apply to them; due to registered functional applicability.

Users Affected: Registered Entities

<u>Description of Change</u>: Additional validation was added to only include risk factors and questions for which the entity has applicable registered functions.

<u>Description of Issue</u>: Registered entity members of a coordinated oversight group were not shown as having an active registration within the IRA and COP Modules.

Users Affected: CEA

<u>Description of Change</u>: Validation related to coordinated oversight was corrected to show entities within coordinated oversight within the IRA and COP modules.

Training Materials Modified: None

User Story 16298

<u>Description of Issue</u>: Update IRA Risk Factors and Mapping in lower environments. CEA users looking to test in the testing and training environments were unable to verify results without the correct risk factor mapping.

Users Affected: CEA

<u>Description of Change</u>: Non-production environments were also updated to include the current risk factor and Standard requirement mapping.

Mitigation Module

User Story 7369

<u>Description of Issue</u>: Add two Boolean fields on mitigation (checkbox) to facilitate certification of completion for mitigation. Should be conditional to show one field with Senior Officer language and another without.

Users Affected: Registered Entities

<u>Description of Change</u>: In the Mitigation Management Module and Self-Report and Logs Module, there was some disclaimer language added on some of the forms for registered entities. This change ensures that the language is included on all the forms, it was missing from a couple forms. Previously, the language was included on the draft finding form, draft mitigation record, and Active form when the entity had a Mitigating Activity. The same language was added to the resubmission forms, formal Mitigation Plan drafts, and Active form for Mitigation Plans when the registered entity is ready to submit the mitigation record to the CEA for verification.

Language on the Mitigating Activity forms in draft state:

By submitting the mitigating activities described above, I acknowledge that I have authority to submit the mitigating activities on behalf of the Registered Entity."

Language on the Mitigation Plan form in draft state:

When ready for Region Review and Approval, Submit this Mitigation by selecting the Submit for CEA Review Action and clicking Save and Action below. By submitting this Mitigation Plan, I acknowledge that I have authority to submit the Mitigation Plan on behalf of the Registered Entity and acknowledge that I am:

- 1. the point of contact for the Mitigation Plan,
- 2. responsible for filing the Mitigation Plan,
- 3. technically knowledgeable regarding the Mitigation Plan, and
- 4. authorized and competent to respond to questions regarding the status of the Mitigation Plan."

Language on the Mitigating Activity form in Active state for when the registered entity is ready to submit the mitigation record to the CEA for Verification state:

I am an authorized representative of the Registered Entity and confirm, on its behalf, that the Mitigating Activities as described above have been completed.

By submitting the Mitigating Activities for Certification of Completion, I acknowledge that I have authority to submit the Mitigating Activities on behalf of the Registered Entity and certify that:

1. I am an officer, employee, attorney, or other authorized representative of the Registered Entity;

2. All required actions described in Mitigating Activities have been completed; and

3. The Registered Entity has provided or will provide data or information sufficient for the Compliance Enforcement Authority to verify completion of the Mitigating Activities.

Language on the Mitigation Plan form in Active state for when the registered entity is ready to submit the mitigation record to the CEA for Verification state:

I am an authorized representative of the Registered Entity and confirm, on its behalf, that the Mitigation Plan as described above have been completed.

By submitting the Mitigation Plan for Certification of Completion, I acknowledge that I have authority to submit the Mitigation Plan on behalf of the Registered Entity and certify that:

1. I am an officer, employee, attorney, or other authorized representative of the Registered Entity;

2. All required actions described in Mitigation Plan have been completed; and

3. The Registered Entity has provided or will provide data or information sufficient for the

Compliance Enforcement Authority to verify completion of the Mitigation Plan.

<u>Training Materials Modified</u>: <u>RE UserGuide.pdf (nerc.com</u>) – Potential updates to slide 20, the second picture to show updated instructions, update slide 30 the picture with #9, update slide 33 picture, slide 37 the forefront picture, update slide 41 with the instructions.

User Story 10319

<u>Description of Issue</u>: After submitting the mitigation to region for verification, this mitigation disappears from My Active Mitigations tab.

Users Affected: Registered Entities

<u>Description of Change</u>: In the Mitigation Management Module, a new tab was created for the registered entity to view mitigation records that are in the Verification state. Previously, once a mitigation record was submitted to the CEA for verification, the registered entity could not view the mitigation in the Mitigation Management Module and had to navigate to the Enforcement Processing module to view the mitigation record. This change will allow the registered entity visibility in the Mitigation Management module to view all mitigation records that are with the CEA for Verification.

:::	Mitigation Man	agement 🗸			
-1- N	ly Draft Mitigations	-/- My Active Mitigations	4- Mitigations in Verification	-1- Consolidated Mitigations	-1- Completed Mitigations
MY MITIGATIONS IN VERIFICATION					

Figure 8: Mitigations in Verification tab

<u>Training Materials Modified</u>: <u>RE UserGuide.pdf (nerc.com)</u> – potential updates to screenshots to show all the tabs on page 28, 38, 42, 43, 44

User Story 11381

Description of Issue: Show the FERC Reporting on all Mitigation tabs.

Users Affected: NERC and CEA

<u>Description of Change</u>: In the Mitigation Management Module, there is a section on the mitigation forms entitled "FERC Reporting Information." This change ensures that this section is included on the mitigation form in all the process steps. Prior to this change, this section was not always visible for CEA and NERC at each process step. The CEA will see this section in read-only field and NERC will see it as a combination of editable and read-only as this field is modified only by NERC.

Training Materials Modified: N/A – adding section on missing form, no updates to training materials

User Story 12508

<u>Description of Issue</u>: Make "Entity Resubmission Date" a required field when Rejecting a Mitigation Activity (Milestone)

Users Affected: CEA

<u>Description of Change</u>: In the Mitigation Module, on the Mitigations Awaiting review tab, the CEA has the ability to request that the registered entity resubmit the mitigation record. When the CEA selects the "Resubmit" action in the CEA Review Action, the data field "Entity Resubmission Date" appears. This change requires that a date is populated in this field before the CEA can click the "Save and Action" button to send the mitigation record back to the registered entity in Draft state.

CEA Review Action 🥥	Resubmit	
CEA Comments Shared with Entity @		
Entity Resubmission Date *	m	Field may not be empty
	EERC Reporting Information	

Figure 9: Required Entity Resubmission Date

<u>Training Materials Modified</u>: <u>RE UserGuide.pdf (nerc.com)</u> – potential update to slide 74 at the information section, update text to indicate date is required and remove second sentence.

User Story 16561

<u>Description of Issue</u>: MITIGATION - Remove 3 month rule on Milestones for formal Mitigation Plans (ENTITY Solution)

Users Affected: Registered Entities

<u>Description of Change</u>: Registered entities are currently unable to submit formal Mitigation Plan records where the future planned milestones are more than three months apart. This change will remove the three-month rule and include language on the form indicating that the CEA maintains discretion to adjust the timeline based on factors such as the complexity of the Mitigating Activities or the risk posed to the Bulk Power System. The control will removed from the draft mitigation form under "Mitigation Management" module.

For the milestone timeline, the CEA may agree to a mutually acceptable timeline for completion of milestones, typically no more than three (3) months for each milestone. The CEA maintains discretion to adjust the timeline based on factors such as the complexity of the Mitigating Activities or the risk posed to the Bulk Power System. Please contact the CEA if you have questions regarding the timeframe between the expected completion dates of the milestones.

<u>Training Materials Modified</u>: <u>RE UserGuide.pdf (nerc.com)</u> – potential update to slide 37 – remove the information icon in the lower left corner.

Description of Issue: Trigger of Audit Finding Issue

Users Affected: Registered Entities

<u>Description of Change</u>: An issue was discovered that for any finding created in the Audit module, the role attributed to the submitter was showing as the CEA instead of the Registered Entity. This incorrect role caused the Save and Action button to not be visible for the Registered Entity for any Audit created findings in Align (ex. 2023-500XX). This change will correct the role to be attributed to the Registered Entity so that the Save and Action button appears for those that have the entity submitter role. For those Audit Findings created in Align, a manual correction will be applied to those records.

<u>Training Materials Modified</u>: N/A – corrected a system role in the back-end, no updates to training materials

Appendix A – Table of User Stories

ID	Chapter	Title
11274	Audit and Spot Check	CA2.4 - Requirements in scope MUST be related to specific entity
14806	Audit and Spot Check	AUDIT - The "ANP Visibility Date" needs to be auto populated with the "ANP Deadline Date" or at minimum not allow to be submitted as blank
15393	Audit and Spot Check	Internal Control Assessments - V3 display issue
10971	Compliance Oversight Plans	COP30 - Add warning text prior to cancel/delete of COP, COP CO
11016	Compliance Oversight Plans	COP1.20 - Export Applicable Standards and Requirements tab from COP record
15391	Compliance Oversight Plans	COP - Null ratings create record issue
15392	Compliance Oversight Plans	COP report section not generating
7776	Enforcement Action and Disposition Module	518 - When relating the CE object to an EA, the drop down list includes EAs from all registrations. And it seems I can add them without an error. Ideally, the drop down should only include EAs for the applicable entity.
9329	Enforcement Action and	Enforcement Action (EA) - Add final filing fields to EA so that
	Disposition Module	NERC can eventually run reports from Align
10306	Enforcement Action and Disposition Module	Fix misspelling on Create Finding screen in Entity view
12693	Enforcement Action and Disposition Module	FINDINGS: Audit finding number is not displaying correctly
12895	Enforcement Action and Disposition Module	NERC - Filings update
16702	Enforcement Action and Disposition Module	FERC FILINGS tab - Need an export button on FERC Filings portlet
15170	Inherent Risk Assessments	IRA - Newly reassigned resource name does not show in the portlet unless the portlet is updated and reopened
15172	Inherent Risk Assessments	IRA - After making an assignment, the IRA record does not immediately update to show the change
15174	Inherent Risk Assessments	IRA - The ERPQ and associated assignments should clear from the dashboard when IRA is cancelled
15398	Inherent Risk Assessments	IRA - Risk Factor ratings drop down option modification
15415	Inherent Risk Assessments	IRA Risk Factors in Prod - Correction needed
15416	Inherent Risk Assessments	IRA - Entities should not see RFQ questions for risk factors that do not apply to their registered functions
15636	Inherent Risk Assessments	Missing Entity From Align IRA/COP Module (NCR11297 - Homer City Generation)
16298	Inherent Risk Assessments	Update IRA Risk Factors and Mapping in lower environments (DEV, UAT, TRN)

7369	Mitigation Module	59 - Add two boolean fields on mitigation (checkbox) to facilitate certification of completion for mitigation. Should be conditional to show one field with Senior Officer language and another without
10319	Mitigation Module	After submitting the mitigation to region for verification, this mitigation disappears from My Active Mitigations tab
11381	Mitigation Module	Show the FERC Reporting on all Mitigation tabs
12508	Mitigation Module	MITIGATION - Make "Entity Resubmission Date" a required field when Rejecting a Mitigation Activity (Milestone)
16561	Mitigation Module	MITIGATION - Remove 3 month rule on Milestones for formal Mitigation Plans (ENTITY Solution)
17051	Mitigation Module	Trigger of Audit Finding issue

Appendix B – Revision History

Revision History		
Version	Date	Revision Details
1.0	05/04/2023	Initial Draft