

Align Enforcement and Mitigation User Guide



Welcome to the Align Enforcement and Mitigation Registered Entity User Guide. Along with the Align [instructional videos](#), this user guide will help you navigate through all of the features included in these modules. Click on a topic in the list below or in the ribbon above to begin.

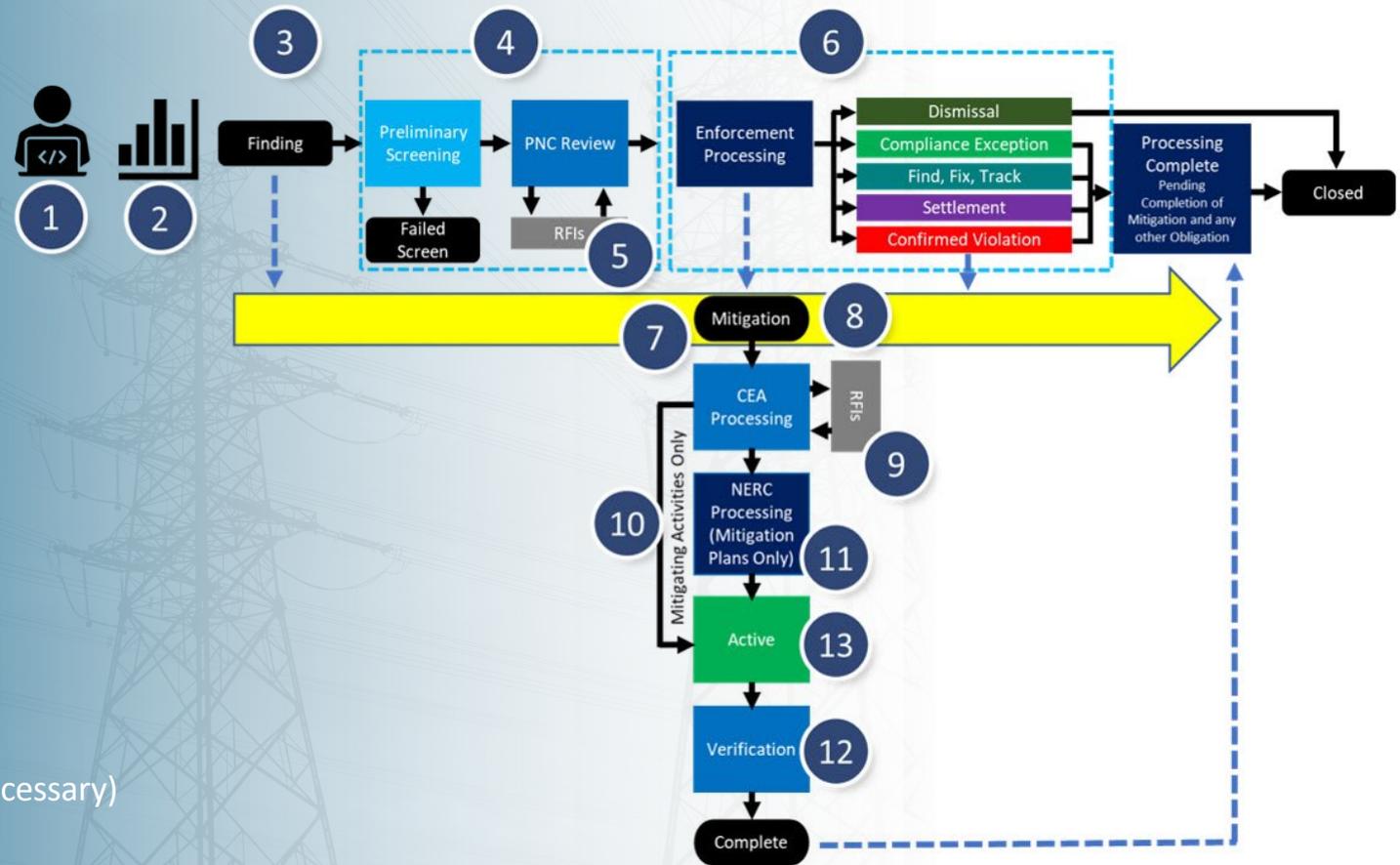
- 1 Accessing Align
- 2 Reviewing the Dashboard
- 3 Creating a Finding
- 4 Updating a Finding
- 5 Responding to an RFI
- 6 Responding to Notification Letters
- 7 Submitting Mitigating Activities
- 8 Mitigation Status Progression
- 9 Mitigation RFIs
- 10 Submitting Mitigation Plans
- 11 Milestone Extension Requests
- 12 Completing Milestones
- 13 Scope Expansions
- 14 Submitting for Verification Review
- 15 Complete Status
- 16 Incomplete Status
- 17 Consolidated Mitigations
- 18 Emails



Enforcement and Mitigation Process Flow

The diagram provides a high level process flow of the life cycles of the noncompliance and mitigation records.

- 1 Log in to Align
- 2 Review the Dashboard
- 3 Create a Finding
- 4 CEA Screen & Review
- 5 Respond to any RFIs
- 6 CEA assigns Disposition
- 7 Submit mitigation
- 8 Update/Resubmit mitigation
- 9 Respond to RFIs
- 10 Submit extension request
- 11 NERC review (Mit Plan only)
- 12 Complete milestones
- 13 Consolidate milestones (if necessary)



Accessing Align



1 For the first time you need to access Align, you need to go to the ERO Portal to login to your account by clicking on **My Account**. If you do not have an ERO Portal Account, please follow instructions in [Align User Guide - Registered Entity Request Access Process](#)

2 From the ERO Portal, select **Request Application Access** from the **My Applications** dropdown

3 Click the **Create New Application Access Request** button

4 Select your entity

5 Select the role that you need from the **Requested Application Role** dropdown:
Align Registered Entity Editor (able to create/edit findings)
Align Registered Entity Reader (able to read findings)
*Align Registered Entity Submitter** (able to create/edit/submit findings)
 *This role is needed to submit evidence to the SEL.

6 Click the **Submit** button
 The Registered Entity Admin can also manage roles of its entity staff. The Registered Entity PCC or Entity Admin need to approve these roles.

The screenshot shows the NERC ERO Portal interface. Callout 1 points to the 'Register' button in the top right corner. Callout 2 points to the 'Request Application Access' option in the 'My Applications' dropdown menu. Callout 3 points to the 'Create New Application Access Request' button. Callout 4 points to the 'Entity' search field. Callout 5 points to the 'Requested Application Role' dropdown menu. Callout 6 points to the 'Submit' button at the bottom of the form.

Accessing Align



- 1 To access the Align solution, please click here: <https://nerc.bwise.net/>, as an entity user select **“External Stakeholders”**
- 2 Enter your Align User Name and Password associated with your ERO Portal Account, then click **Sign In**
- 3 You will have to complete the two-factor authentication prompt
- 4 Click on the **Align for Entities** honeycomb

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

This is a North American Electric Reliability Corporation (NERC) information system restricted to authorized individuals. You have no reasonable expectation of privacy regarding communications or data transiting or stored on NERC's information system. At any time and for any lawful purpose, NERC may monitor, intercept, record, and search any communications or data transiting or stored on this information system. At NERC's sole discretion, NERC may disclose pertinent information to the U.S. Government and its authorized representatives to protect the security of critical infrastructure and key resources, ensure information security, or to comply with any applicable law, regulation, legal process, or enforceable governmental request. By continuing, you acknowledge that you understand and consent to the terms and conditions described in this notice. The actual or attempted unauthorized access, use, or modification of this system is strictly prohibited and may subject violators to criminal, civil, and/or administrative action.

Sign in with one of these accounts

- External Stakeholders
- NERC Staff

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Sign in

Username

Password

Keep me signed in

Sign in

[Legal Notice](#)

[Forgot username or password?](#)

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Check for a Duo Push

Verify it's you by approving the notification...

Sent to [redacted]

Sign in

[Other options](#)

Need help? Secured by Duo

Solutions Cloud

Solutions

Align For Entities

Get more



Reviewing the Dashboard

Access the **Align Dashboard**

Notice the **two** sections:

- a) My Tasks
- b) News and Updates – this will show any planned outage information

- 1 To open a task, click the **Unique ID**
- 2 To close a task, click the **X**
- 3 The tasks can be saved and edited (**Save**) and submitted (**Save and Action**) from the dashboard

The screenshot shows the ALIGN dashboard interface. At the top, there's a navigation bar with 'My Align' and 'Align For Entities'. Below that, a 'My Dashboard and Tasks' section is visible. A 'NEWS AND UPDATES' section is on the right. The main area is divided into 'MY TASKS' and a detailed task view for ID '2024-00123'. The 'MY TASKS' table lists various tasks with checkboxes and unique IDs. The detailed view shows 'General Information' and 'Entity Assigned to' sections. Callout 1 points to the Unique ID in the task list. Callout 2 points to the close button (X) in the task view header. Callout 3 points to the 'Save and Action' button at the bottom of the task view.

TYPE	UNIQUE ID
<input type="checkbox"/> Mitigating Activities	2024-00123
<input type="checkbox"/> RFI for Finding	2024-00123 RF24-000818
<input type="checkbox"/> Notice of Completion Letter	2023-00159 NO23-000438
<input type="checkbox"/> Entity Questionnaires	IR22-00074
<input type="checkbox"/> Risk Factor/ ERPQ Question(s)	IR22-00074 - CIP - External Electronic...

General Information

Type: Mitigating Activities | Related PNC: 2024-00123 | CEA | MRO

Applicable Requirement: CIP-002-5.1a R1. | Registered Entity Contact: Please provide a point of contact for this mitigation.

Applicable Part(s): CIP-002-5.1a R1.3.; CIP-002-5.1a R1.2.; CIP-002-5.1a R1.1.

Applicable Reliability Function(s): GO; TO

Region-Jurisdiction(s) in which the Potential Noncompliance occurred: MRO-US

Entity Assigned to

FIRST NAME | LAST NAME | This table is empty

Review Results and Due Date

Save and Action | Save | Close



Reviewing the Dashboard

The following items will appear on your **My Align dashboard**:

- RFIs for PNCs that are awaiting their response
- RFIs for Mitigations that are awaiting their response
- Mitigations that were sent back by the CEA for resubmission
- Mitigation activities that need to be resubmitted as formal Mitigation Plans
- Mitigations that were sent back by NERC Unacknowledged Notifications
- Mitigations that were sent back as a revision
- Mitigations that were sent back for a rejected certification

NOTE: When items appear on the My Align Dashboard, the date of submittal is not visible. The only date you will see is the **due date** if applicable. In addition to the Enforcement and Mitigation items listed above, other items from the Compliance modules will appear here.

The screenshot shows the 'My Align' dashboard. At the top, there's a navigation bar with 'My Align' and 'Align For Entities'. Below that, a tab for 'My Dashboard and Tasks' is selected. The main content area is titled 'Assigned To Me' and contains a welcome message from ALIGN. Below the message is a table of tasks.

MY TASKS										
<input type="checkbox"/>	TYPE	UNIQUE ID	REGION OR LRE	STATUS	REGISTRATION	STANDARD AND REQ	DUE DATE	CREATED BY	MODIFIED BY	MODIFIED ON
<input type="checkbox"/>	Mitigating Activities	2024-00123	MRO	Resubmit	2024-00123 - Resubmission Request	OPR-24-00123	2024-00123	NERC Editor 1	NERC Editor 1	2024-00123
<input type="checkbox"/>	RFI for Finding	2024-00123 RF24-000818	MRO	Awaiting your Response	2024-00123 - Resubmission Request	OPR-24-00123	2024-00123	NERC Editor 1	NERC Editor 1	2024-00123
<input type="checkbox"/>	Notice of Completion Letter	2023-00159 NO23-000438	MRO	Awaiting your Response	2023-00159 - Resubmission Request	OPR-23-00159				2023-00159
<input type="checkbox"/>	Entity Questionnaires	IR22-00074	MRO	Awaiting your Response	IR22-00074 - Resubmission Request		2022-00074		NERC Editor 1	2022-00074
<input type="checkbox"/>	Risk Factor/ ERPQ Question(s)	IR22-00074 - CIP - External Electronic...	MRO	Awaiting your Response	IR22-00074 - Resubmission Request		2022-00074		NERC Editor 1	2022-00074



Reviewing the Dashboard: Sorting & Filtering

Each table in Align allows you to **Sort** or **Filter** by any column.

- 1 Hover over a column title and click the **dropdown arrow** (if you click on a column name it will sort either ascending or descending)
- 2 From the dropdown, you can sort alphabetically (**a**), choose columns to show or hide (**b**), or enter text to **Filter** the table
- 3 You can also filter the table to show only items assigned to you by clicking the **Assigned to Me** checkbox

The screenshot shows the 'My Align' dashboard with a table titled 'MY TASKS'. The table has columns for TYPE, UNIQUE ID, REGION OR LRE, and STATUS. A dropdown menu is open over the 'REGION OR LRE' column, showing options for 'Sort Ascending', 'Sort Descending', 'Columns', and 'Filters'. Callout 1 points to the dropdown arrow, callout 2 points to the 'Filters' option, and callout 3 points to the 'Assigned To Me' checkbox in the table's header.

<input type="checkbox"/>	TYPE	UNIQUE ID	REGION OR LRE	STATUS
<input type="checkbox"/>	Mitigating Activities	2024-00123		submit
<input type="checkbox"/>	Entity Questionnaires	IR22-00074		Submitting your Response
<input type="checkbox"/>	Risk Factor/ ERPQ Question(s)	IR22-00074 - CIF External Electronic...		Submitting your Response



Reviewing the Dashboard

The **Align Dashboard** provides a snapshot of your current tasks, but you'll need to change views to access other important information and actions.

To change views:

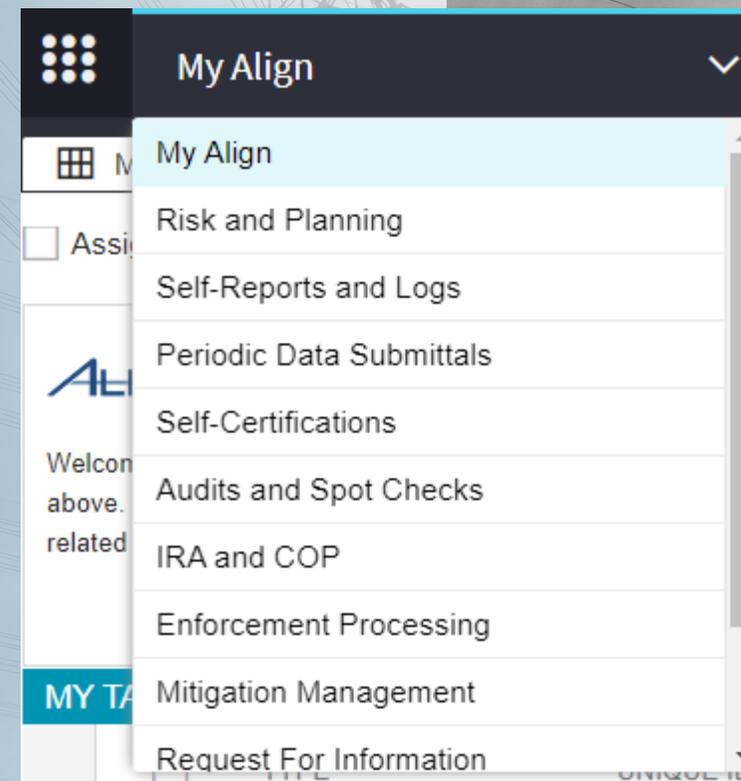
- 4 Click the **dropdown arrow** at the top of the screen
- 5 Click on **the view** that you need to see

The screenshot shows the 'My Align' dashboard. At the top, there is a navigation bar with a dropdown arrow (labeled 4) and the text 'Align For Entities'. Below this, a secondary bar shows 'My Dashboard and Tasks' and 'NCR5555 Entity Editor 1'. The main content area is divided into sections: 'Assigned To Me', 'MY TASKS', and 'NEWS AND UPDATES'. A dropdown menu is open, showing various navigation options (labeled 5): My Align, Risk and Planning, Self-Reports and Logs, Periodic Data Submittals, Self-Certifications, Audits and Spot Checks, IRA and COP, Enforcement Processing, Mitigation Management, and Request For Information. A table with columns 'STANDARD AND REQ', 'DUE DATE', 'CREATED BY', 'MODIFIED BY', and 'MODIFIED ON' is visible in the background.



Reviewing the Dashboard

- The **My Align** view allows you to view the home landing page for Align.
- The **Risk and Planning** view allows you to view scheduled engagements your compliance enforcement authority has marked visible to your entity, such as audits or spot checks.
- The **Self-Reports and Logs** view allows you to create and submit any draft Self-Report or Self-Log to your CEA.
- The **Periodic Data Submittals** view allows you to create and manage your PDS requests and submittals.
- The **Self-Certifications** view allows you to manage your Self-Certification requests and submittals.
- The **Audits and Spot Checks** view allows you to manage monitoring engagements and related information and actions.
- The **IRA and COP** view allows you to IRA questionnaires and Compliance Oversight Plan risk information.
- The **Enforcement Processing** view allows you to monitor the status of your findings and submit updates to your CEA.
- The **Mitigation Management** view is where you will go to submit, monitor, and edit your mitigation records.
- The **Request For Information** view allows you RFIs that are issued to your entity from Enforcement and Mitigation modules, PDS module, Self-Certification module, and TFE module.
- The **Technical Feasibility Exception** view allows you to manage your TFE requests.
- The **Attestation** view allows you to manage your Attestation requests.





Creating a Finding

To create a **finding** in Align, navigate to the **Self-Report and Self-Logs View**.

- 1 Click the **dropdown arrow**
- 2 Select the **Self-Report and Self-Logs** view
- 3 Click **Create Finding**

If your entity is registered in multiple Regions, you can expect to see all of the registrations in this section. The entity will select the NCR registered in the Region it wants to report the violation.

The screenshot shows the 'My Align' dashboard. A dropdown menu is open under 'My Align', with 'Self-Reports and Logs' selected. Below this, the 'Self-Reports and Logs' page is visible, featuring a 'Create New Self-Report or Log' button. The 'MY REGISTRATIONS' section contains a table with one entry:

REGISTRATION	APPLICABLE REQUIREMENTS
NCR55555 - test confirm name change in MRO	Create Finding

Below the table is a pagination control showing 'Page 1 of 1'. The 'MY DRAFTS' section is also visible at the bottom of the screenshot.



Creating a Finding

Review the relevant **Standard** and create a new **finding**

- 4 Click on a **Standard & Requirement** to review
- 5 Review the language in the right panel
- 6 Click + in the "Create Self-Report" or "Create Self-Log" column

Create Finding 2.0

SELECT APPLICABLE REQUIREMENT

STANDARD	REQ	CREATE	CREATE
CIP-002-5.1a	R1.		
CIP-002-5.1a	R2.		
CIP-003-8	R1.		
CIP-003-8	R2.		
CIP-003-8	R3.		
CIP-003-8	R4.		
CIP-004-6	R1.		
CIP-004-6	R2.		
CIP-004-6	R3.		
CIP-004-6	R4.		
CIP-004-6	R5.		
CIP-006-6	R1.		
CIP-006-6	R2.		
CIP-006-6	R3.		

REQUIREMENT

Standard and Requirement CIP-002-5.1a | R2.

Requirement Language The Responsible Entity shall:

Time Horizon(s) Operations Planning Violation Risk Low
Factor (VRF)

Requirement Number R2.

Measure M2. Acceptable evidence includes, but is not limited to, electronic records to demonstrate that the Responsible Entity has reviewed necessary, the identifications required in Requirement R1 and if CIP Senior Manager or delegate approve the identifications required and its parts at least once every 15 calendar months, even if it is Requirement R1 and its parts, as required by Requirement R2.

Requirement Applicability BA
TOP
TO
RC
IA
GOP
DP
GO

Additional Applicability Details 4.1. Functional Entities: For the purpose of the requirements on the following list of functional entities will be collectively referred to as "Functional Entities." For requirements in this standard where a specific functional entity or entities are the applicable entity or entities, the functional entities are specified explicitly.
4.1.2. Distribution Provider that

Create Finding 2.0

SELECT APPLICABLE REQUIREMENT

STANDARD	REQ	CREATE SELF-REPORT	CREATE SELF-LOG
CIP-002-5.1a	R1.	+	•
CIP-002-5.1a	R2.	+	•
CIP-003-8	R1.	+	•
CIP-003-8	R2.	+	•
CIP-003-8	R3.	+	•
CIP-003-8	R4.	+	•
CIP-004-6	R1.	+	•
CIP-004-6	R2.	+	•
CIP-004-6	R3.	+	•
CIP-004-6	R4.	+	•
CIP-004-6	R5.	+	•
CIP-006-6	R1.	+	•
CIP-006-6	R2.	+	•
CIP-006-6	R3.	+	•



Creating a Finding

Create A Self-Report: The user will no longer have to login under multiple credentials to access records that were submitted under a different registration so when a Registered Entity creates a Finding, the user should confirm that the Create Finding link is associated with the correct registration.

The registration is not checked against the start date. The entity could submit a violation with a start date prior to its registration date.

Create A Self-Log: If you have been accepted into the Self-Logging program by your CEA, check with them to see how they want you to submit Self-Logs and how frequently. They may want you to start submitting Self-Logs through Align or they may want you to continue submitting Self-Logs to them directly. If you submit Self-Logs directly to your CEA, they will upload them into Align, so that you will still see them in your system.

Another thing to consider is that Align does not currently differentiate between which Reliability Standards and Requirements that you have been approved for and those which you have not.

Create Finding 2.0

SELECT APPLICABLE REQUIREMENT

STANDARD	REQ	CREATE SELF-REPORT	CREATE SELF-LOG
CIP-002-5.1a	R1.	+	•
CIP-002-5.1a	R2.	+	•
CIP-003-8	R1.	+	•
CIP-003-8	R2.	+	•
CIP-003-8	R3.	+	•
CIP-003-8	R4.	+	•
CIP-004-6	R1.	+	•
CIP-004-6	R2.	+	•
CIP-004-6	R3.	+	•
CIP-004-6	R4.	+	•
CIP-004-6	R5.	+	•
CIP-006-6	R1.	+	•
CIP-006-6	R2.	+	•
CIP-006-6	R3.	+	•

Page 1 of 9



Creating a Finding

Ensure the **Requirement Parts** and **Reliability Functions** are applicable for the Self-Report.

Remove any Parts or Functions that do not apply.

When a Finding is created, if the Reliability Standard Requirement has Sub-Parts, the form will auto-populate all the Sub-Parts. You should confirm that all the Sub-Parts are applicable to their registration as well as the facts and circumstances of the noncompliance. Sub-Parts that are not applicable will need to be removed manually.

Create a Self-Report
✕

Instructions

Self-Reports are encouraged at the time a Registered Entity becomes aware that it has, or may have, violated a Reliability Standard. Self-Reports are encouraged regardless of whether the Reliability Standard requires reporting on a pre-defined schedule in the Compliance Program or whether the violation is determined outside the pre-defined reporting schedule.

Complete the information on this form and **Save** your Self-Report as a draft. You can access draft Self-Reports and Self-Logs under the **My Drafts** section of the **Create Finding** tab and continue editing until you are ready to submit.

General Information

Registration *	NCR55555 - test confirm name change in MRO				Region – Jurisdiction in which the Potential Noncompliance occurred	MRO-US
Applicable Requirement	CIP-002-5.1a R2.				Other Region – Jurisdiction(s) where you are reporting this Potential Noncompliance	<input type="text"/>
Applicable Part(s)	<input type="text" value="CIP-002-5.1a R2.1. ✕"/> <input type="text" value="CIP-002-5.1a R2.2. ✕"/> 7					
Applicable Reliability Function(s)	<input type="text" value="GO ✕"/> <input type="text" value="TO ✕"/> 8					

7 Click **X** to remove **Applicable Parts**

8 Click **X** to remove **Reliability Functions**

Creating a Finding



Add any **Applicable Parts** and **Functions** not included.

- 9 Click the **Arrow** to open the drop-down list
- 10 Select the **Part** from the list
- 11 Click the **Arrow** to open the drop-down list
- 12 Select a **Function** from the list

Create a Self-Report

Instructions

Self-Reports are encouraged at the time a Registered Entity becomes aware that it has, or may have, violated a Reliability defined schedule in the Compliance Program or whether the violation is determined outside the pre-defined reporting schedule. Complete the information on this form and **Save** your Self-Report as a draft. You can access draft Self-Reports and Self-

General Information

Registration * NCR55555 - test confirm name change in MRO

Applicable Requirement CIP-002-5.1a R2.

Applicable Part(s) 9

Applicable Reliability * CIP-002-5.1a R2.1.

Function(s) CIP-002-5.1a R2.2. 10

Create a Self-Report

Instructions

Self-Reports are encouraged at the time a Registered Entity becomes aware that it has, or may have, violated a Reliability defined schedule in the Compliance Program or whether the violation is determined outside the pre-defined reporting schedule. Complete the information on this form and **Save** your Self-Report as a draft. You can access draft Self-Reports and Self-

General Information

Registration * NCR55555 - test confirm name change in MRO

Applicable Requirement CIP-002-5.1a R2. 11

Applicable Part(s)

Applicable Reliability * 12

Function(s)

- BA
- DP
- DP-UFLS

When a Finding is created, the **Applicable Reliability Functions** section on the form will auto-populate based on the Functions applicable to your entity and the Functions applicable to the Reliability Standard Requirement. You should confirm that all the Reliability Functions selected are applicable to the facts and circumstances of the noncompliance. If there are any functions that are not applicable, you will need to remove those manually by clicking on the **X** next to that function.



Creating a Finding

Select additional **Regions** to add to the finding, if necessary. This section is to allow the Registered Entity to notify the CEA that it is reporting a finding to another CEA.

13 Click the **Arrow** to open the drop-down list.

14 Select the **Region** from the list.

You can **Save** the finding as a draft at any time. To save:

15 Click the **Save** button

Create a Self-Report
✕

Instructions

Self-Reports are encouraged at the time a Registered Entity becomes aware that it has, or may have, violated a Reliability Standard. Self-Reports are encouraged regardless of whether the Reliability Standard requires reporting on a pre-defined schedule in the Compliance Program or whether the violation is determined outside the pre-defined reporting schedule.

Complete the information on this form and **Save** your Self-Report as a draft. You can access draft Self-Reports and Self-Logs under the **My Drafts** section of the **Create Finding** tab and continue editing until you are ready to submit.

General Information

Registration * NCR55555 - test confirm name change in MRO

Applicable Requirement CIP-002-5.1a R2.

Applicable Part(s) CIP-002-5.1a R2.1. ✕

Applicable Reliability * Function(s) GO ✕ TO ✕

Region – Jurisdiction in which the Potential Noncompliance occurred MRO-US

Other Region – Jurisdiction(s) where you are reporting this Potential Noncompliance

FRCC-US

MRO-MB

MRO-SK

MRO-US

NCEA-US

NPCC-NB

NPCC-NS

NPCC-ON

NPCC-QC

NPCC-US

Discovery and Description

When was the Potential Noncompliance discovered?*

How was this Potential Noncompliance discovered? *

Please describe the Potential Noncompliance

When did the Potential Noncompliance start? *

What is the basis for your selecting this start date? *

Is the Potential Noncompliance still occurring? *

Save
Close



Creating a Finding

16 After **Saving** the Draft Finding, the **Create Finding** portlet is still visible, you will need to click the **X** to close the Standards window

17 Click the **Refresh Icon** at the bottom of the **My Drafts** portlet to see your new draft in the **Draft Findings** section

18 Click the **Unique ID** to open your finding

As you fill out the rest of the form, notice that some fields have a gray **question mark icon (a)**. Hover over these to see a description of what information the field is requesting.



Creating a Finding

Once you have completed the finding form, you'll need to select an **Action** from the Action dropdown (a).

If you try to submit the finding without selecting an Action, you will get an error (b).

19 Select the **Submit** option in the Action dropdown. If you need to delete the draft finding, select the **Delete** option in the Action dropdown.

20 Click the **Save and Action** button to submit

If you have left any required fields blank, the form will identify where you are missing information by see a red box and exclamation mark (c).



Creating a Finding: Discovery and Description

Scroll to the **Discovery and Description** section to complete the finding.

- 21 Select the **Date** the Potential Noncompliance (PNC) was discovered
- 22 Enter an **Explanation** of how the PNC was discovered
- 23 Enter a **Description** of the PNC

Discovery and Description

<p>When was the Potential Noncompliance discovered?*</p> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center;"> <input style="width: 80%;" type="text"/> <div style="border: 1px solid #ccc; padding: 2px 5px; margin-left: 5px;"> </div> </div> <div style="position: absolute; top: -20px; left: 50%; transform: translate(-50%, -50%); border: 2px solid #00AEEF; border-radius: 50%; width: 30px; height: 30px; display: flex; align-items: center; justify-content: center; font-weight: bold; color: white; background-color: #00AEEF;">21</div>	<p>When did the Potential Noncompliance start? *</p> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center;"> <input style="width: 80%;" type="text"/> <div style="border: 1px solid #ccc; padding: 2px 5px; margin-left: 5px;"> </div> </div>
<p>How was this Potential Noncompliance discovered? *</p> <div style="border: 1px solid #ccc; padding: 10px; min-height: 80px;"> <div style="position: absolute; top: -20px; left: 50%; transform: translate(-50%, -50%); border: 2px solid #00AEEF; border-radius: 50%; width: 30px; height: 30px; display: flex; align-items: center; justify-content: center; font-weight: bold; color: white; background-color: #00AEEF;">22</div> </div>	<p>What is the basis for your selecting this start date? *</p> <div style="border: 1px solid #ccc; padding: 10px; min-height: 80px;"></div>
<p>Please describe the Potential Noncompliance in detail *</p> <div style="border: 1px solid #ccc; padding: 10px; min-height: 80px;"> <div style="position: absolute; top: -20px; left: 50%; transform: translate(-50%, -50%); border: 2px solid #00AEEF; border-radius: 50%; width: 30px; height: 30px; display: flex; align-items: center; justify-content: center; font-weight: bold; color: white; background-color: #00AEEF;">23</div> </div>	<p>Is the Potential Noncompliance still occurring? *</p> <div style="border: 1px solid #ccc; padding: 10px; min-height: 40px;"></div>



Creating a Finding: Discovery and Description

24 Select the **Date** the PNC started

*This start date does not validate against your entity's registration dates or against the effective date of the different versions of the Reliability Standard. You should check the start date against the entity registration date and that the start date is applicable to either the current version of the standard's effective date or a prior version's effective date. Also, if you do not use the calendar feature, be sure to enter the date in the format **MM/DD/YYYY**.*

25 Enter an **Explanation** of how the PNC was discovered

Although the 'basis for selecting the dates' text field is not required, this is the opportunity to explain why you chose the dates and possibly prevent a Request for Information request to obtain this information.

Discovery and Description

24

When did the Potential Noncompliance start? *

What is the basis for your selecting this start date? *

25

Is the Potential Noncompliance still occurring? *



Creating a Finding: Discovery and Description

26 Select **Yes** or **No** if the PNC is still occurring

27 If you selected **No**, select the **Date** you returned to compliance

You should only include a date when you returned to compliance if the events have actually occurred. Further, if you indicate that the noncompliance is no longer occurring, the validation does not check that a date has been included in the return to compliance data field.

Discovery and Description ⚠️ 6

When did the Potential Noncompliance start? * 📅 ⚠️

What is the basis for your selecting this start date? * ⚠️

Is the Potential Noncompliance still occurring? * ⚠️

26

Is the Potential Noncompliance still occurring? * ▼

No

When did you return to compliance? 📅 ⚠️

27



Creating a Finding: Extent of Condition

To complete the **Extent of Condition and Root Cause** section:

28 Indicate if the Extent of Condition Review has been performed by selecting **Yes**, **No**, or **In-Progress**

29 If you selected Yes, **describe** the Extent of Condition

If the Extent of Condition has not been performed at time of submittal, the entity can submit a finding update to provide this information to the CEA later in the process.

30 Enter the **cause(s)** of the PNC.

Extent of Condition and Root Cause

Has an Extent of Condition Review been performed? *

Yes ▼

If yes, what was/is the Extent of the Condition? ⓘ

Draft Text - explain extent of condition

What cause(s) led to the Potential Noncompliance? ⓘ

Draft Text - explain the entity's determined cause that led to the Potential Noncompliance

This text field is not checked for validation, so be sure to confirm that you include language here before submitting.



Creating a Finding: Risk and Impact

To complete the **Risk and Impact** section:

- 31 Indicate the level of Potential Impact to the BPS as **Minimal**, **Moderate**, or **Serious**. If this is a Self-Log finding, the Potential Impact to the BPS will be set to Minimal.
- 32 Enter the **reason** you chose the Potential Impact level you selected
- 33 Describe **how likely** it is that impact could have occurred
- 34 Indicate if there was any impact to the BPS by selecting **Yes**, **No**, or **Unknown**
- 35 If there was an impact, **describe** what the impact was.

Risk and Impact

What do you think the Potential Impact to BPS was/is from this Potential Noncompliance? *

Why do you believe that to be the correct Potential Impact? *

How likely is it that Impact could have actually occurred? *

Was there any actual impact to the BPS? *

If yes, what was the Actual Impact to the BPS? *

Draft Text - why do you believe that to be the correct Potential Impact

Draft Text - how likely is it that Impact could have actually occurred?

Yes

Draft Text - what was the Actual Impact to the BPX

This text field is not checked for validation, so be sure to confirm that you include language here before submitting.



Creating a Finding

Scroll to the optional **Additional Comments** section

36 Enter any **Additional Comments** that you want to document

37 Enter any related evidence in the **Secure Evidence Locker (SEL)** using the reference number **(a)** to link it to this finding.

Your CEA would find it helpful if you indicate when you have submitted evidence files into the SEL. When you submit evidence into the SEL, there will be a reference number that you should provide to your CEA. The 'Additional Comments' field may be a good way to communicate this with your CEA.

You can also help the CEA by including the contact information of the person they should reach out to if there are any questions on the Self-Report or Self-Log form.

Additional Comments

Please provide any additional comments

36

Evidence

Secure Evidence Locker Instructions	Submit Evidence or Attachments related to this item via ERO Secure Evidence Locker (SEL) located at https://eus.eroenterprise.com/nerc-infrastructure with the following reference number: MRO NCR55555 VI2024-00124 VI2024-00124 CIP-002-5.1a R2. 2.1.
If you are hosting your own SEL, please provide a hyperlink to your locker in the comment section above.	





Creating a Finding: Mitigation Information

Every finding will need to be paired with a mitigation record eventually, but the **Mitigation Information** section is optional at this stage

38 If you are ready to enter mitigation milestones for this finding, click the **heading** to expand the section

39 To add a milestone, click the **+** icon and follow the steps **noted here**

When you add a milestone on the finding form, you will not be able to edit until the Self-Report/Self-Log has been saved at least once. You will be able to edit the mitigation milestones once it is in the draft form. After you have saved the record, you can edit the milestone details or delete a milestone.

40 When you're ready to submit the finding, select **Submit** for the action.

Mitigation Information (optional - click to expand) **38**

Instructions 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. Click the **+** to add each completed and/or planned task for remediation and mitigation. When you Submit your Self-Report, this information will be converted into a set of Mitigating Activities that can be submitted concurrently with this Self-Report, or separately when it is ready.

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

+ **39**

Action

Instructions **Submit Finding:** Select "Submit" on the Action dropdown, then click the Save and Action button at the bottom of the screen.
OPTIONAL - Submit Mitigations: Submit mitigations now by checking the box "Submit Mitigations for Review with Finding?" or later via the "My Mitigations Tab".
 By submitting the mitigating activities described above, I acknowledge that I have authority to submit the mitigating activities on behalf of the Registered Entity.
Delete Finding: Select "Delete" on the Action dropdown, then click the Save and Action button at the bottom of the screen.
Save a Draft: Click the Save button at bottom of the screen. The CEA will not see this finding until the Registered Entity selects "Submit" on the Action dropdown and clicks the Save and Action button.
Close: Click the Close button at the bottom of the screen to close the window.

Action *

Submit Mitigations for Review with Finding?

40

Save and Action **Save** **Close**



Creating a Finding: Mitigation Information

41 If you added Mitigation Information and want to submit it, click the **Submit Mitigations for Review with Finding** checkbox

If you created mitigating activities and want to submit them at the same time as the finding, you'll need to click this check box before clicking Save and Action. If you added mitigating activities but are not ready to submit, you can leave the box unchecked and a draft of these activities will be saved and can be located in the Mitigation Management section using the same unique ID for the finding.

Note that Align does validate against the mitigation section, so if you do not add any mitigation information but do check the 'Submit Mitigations for Review with Finding' button, Align will provide an error message.

42 Click the **Save and Action** button

Mitigation Information (optional - click to expand)

Instructions 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. Click the + to add each completed and/or planned task for remediation and mitigation. When you Submit your Self-Report, this information will be converted into a set of Mitigating Activities that can be submitted concurrently with this Self-Report, or separately when it is ready.

	MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	ACTUAL COMPLETION DATE
+	This table is empty				

Action

Instructions **Submit Finding:** Select "Submit" on the Action dropdown, then click the Save and Action button at the bottom of the screen.
OPTIONAL - Submit Mitigations: Submit mitigations now by checking the box "Submit Mitigations for Review with Finding?" or later via the "My Mitigations Tab".
 By submitting the mitigating activities described above, I acknowledge that I have authority to submit the mitigating activities on behalf of the Registered Entity.
Delete Finding: Select "Delete" on the Action dropdown, then click the Save and Action button at the bottom of the screen.
Save a Draft: Click the Save button at bottom of the screen. The CEA will not see this finding until the Registered Entity selects "Submit" on the Action dropdown and clicks the Save and Action button.
Close: Click the Close button at the bottom of the screen to close the window.

Action * Submit

Submit Mitigations for Review with Finding?

41

Save and Action
Save
Close

42



Updating a Finding: Sorting

1 From the Dashboard, click the **dropdown** arrow to change the view

2 Select the **Enforcement Processing** view

You can sort or filter the **My Open Findings** table by any column to help you locate the finding you are looking for:

3 To sort, you can either click on the **header** to sort ascending or descending, or hover over a column title and click the **dropdown arrow**

4 Click the **Sort Ascending** or **Sort Descending** option to rearrange the table by the data in that column

The screenshot shows the 'My Align' dashboard with the 'Enforcement Processing' view selected. The 'My Open Findings' table is displayed with columns: MONITORING METHOD, UNIQUE_ID, REGION OR LRE, DATE SUBMITTED, REGISTRATION, and STANDARD. A dropdown menu is open over the 'REGISTRATION' column header, showing 'Sort Ascending' and 'Sort Descending' options. The 'Sort Descending' option is highlighted.

	MONITORING METHOD	UNIQUE_ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD
<input type="checkbox"/>	Self-Report	2024-00123	MRO	05/20/2024	firm name change in	CIP-002-5.1a
<input type="checkbox"/>	Self-Report	2023-00159	MRO	05/05/2023	firm name change in	CIP-002-5.1a



Updating a Finding: Filtering

Depending on what you are looking for, Filters may be more effective than sorting.

Note, the filters are not “sticky,” so if you navigate away from this page, Align will not retain the filters that you applied.

To filter:

- 5 Hover over the column title of the column you want to filter and click the **dropdown arrow**
- 6 Select the **Filters** option
- 7 Enter part or all of the **phrase** that you are looking for
- 8 To remove the filter, click the **checkbox** next to the Filters option

You can also filter if you hover over a field and right click **Filter on this value (a)**

The screenshot shows the 'Enforcement Processing' section with a table titled 'MY OPEN FINDINGS'. The table has columns for 'MONITORING METHOD', 'UNIQUE_ID', 'REGION OR LRE', 'DATE SUBMITTED', 'REGISTRATION', 'STANDARD', 'REQ', 'START DATE', 'CREATED BY', and 'MODIFIED BY'. A dropdown menu is open over the 'REQ' column, showing options: 'Sort Ascending', 'Sort Descending', 'Columns', and 'Filters'. A search box at the bottom right of the dropdown contains the text 'CIP-002'. Numbered callouts 5 through 8 point to the dropdown arrow, the 'Filters' option, the search box, and the 'Filters' checkbox respectively.

This close-up shows a table row with columns 'STANDARD', 'REQ', and 'START DATE'. The 'REQ' cell contains the value 'P1'. A context menu is open over this cell, with the option 'Filter on this value' highlighted by a yellow arrow labeled 'a'.



Updating a Finding

Once you have located the finding that needs to be updated:

- 9 Click the **+** icon in the **Send Update** column
- 10 Enter a summary of the changes that you are making into the **Summary of Finding Update** field and add the updated data into the relevant fields
- 11 Click the **Update** button

9 Click the **+** icon in the **Send Update** column

10 Enter a summary of the changes that you are making into the **Summary of Finding Update** field and add the updated data into the relevant fields

11 Click the **Update** button

While only the **Summary of Finding Update** text field is required, you should try to include all relevant details in the form.

You have the ability to submit a finding update (scope expansion) on the noncompliance after it has been submitted to your CEA until NERC has approved the disposition record. Continue to work with the CEA on the timing of the submittal as well as whether the information is appropriate for a finding update or if it should be on its own submittal of a new noncompliance issue.

If the CEA does not think the finding update is applicable, they will contact you and explain why and what actions you need to take. In Align, there is no communication in response to CEA determining the finding update is not appropriate. If the CEA does think the finding update is applicable, the CEA will need to add the information to the violation record in their system during their review process.



Updating a Finding

If you want to verify that your update was captured:

12 Click the **Unique ID** of the finding you updated

13 Scroll down to the **Related Items** section and click on the Unique ID under the **Submitted Finding Updates** section

NOTE: the information on the Finding Update form does not update the original submission, it remains on the Finding Update form.

My Open Findings
My Closed Findings

MY OPEN FINDINGS

	MONITORING METHOD	UNIQUE_ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	CREATED BY
<input type="checkbox"/>	Audit	2024-50019	MRO	06/18/2024	NCR55555 - test confirm name change in MRO	CIP-008-6	R1.	06/18/2024	
<input type="checkbox"/>	Self-Report	2024-00146	MRO	06/18/2024	NCR55555 - test confirm name change in MRO	CIP-002-5.1a	R1.	06/18/2024	
<input type="checkbox"/>	Self-Report	2024-00123	MRO	05/20/2024	NCR55555 - test confirm name change in MRO	CIP-002-5.1a	R1.	05/20/2024	
<input type="checkbox"/>	Self-Report	2023-00159							

Related Items

SUBMITTED FINDING UPDATES

	UNIQUE ID	SENT
<input type="checkbox"/>	UF24-00048	06/24/2024



Responding to an RFI: My Align Dashboard

When your CEA or NERC sends an RFI, you are able to view the RFI in three locations: **My Align Dashboard**, **Request for Information** module, and the **Finding Record**.

On the My Align Dashboard, the RFIs that are issued for a Finding will show as **RFI for Finding** (issued from the PNC Process state) or **RFI for EA** (issued from the EA Process state)

In addition to seeing RFIs on your dashboard, the PCC and ACCs will receive an email with the RFI unique ID number in the Subject line and the violation ID number in the body. Currently, emails may not identify whether the RFI is for a Finding record (Potential Noncompliance or Enforcement Action process state) or a Mitigation record. Align will also copy the RFI to the Finding record under the 'Requests for Information' section. You can view it there, but you will still need to open it from the My Align Dashboard in order to respond.

In the current version, you will not receive a notification if the RFI response has been accepted; a notification is only sent to the PCC and ACCs if the CEA determines the RFI is incomplete. However, you can view the status of the RFI from the Finding form or the Request for Information module. The statuses are: **Awaiting Response from Entity**, **Awaiting Region Review**, **Incomplete**, **Complete**, **Cancelled**.

The screenshot shows the 'My Align' dashboard interface. At the top, there's a navigation bar with 'My Align' and a dropdown arrow. Below that, a tab labeled 'My Dashboard and Tasks' is active. A checkbox for 'Assigned To Me' is present. The main content area features the ALIGN logo and a welcome message. Below the message is a section titled 'MY TASKS' containing a table with columns for TYPE, UNIQUE ID, REGION OR LRE, STATUS, REGISTRATION, STANDARD AND REQ, and DUE DATE. The table lists four tasks, with the 'RFI for Finding' row highlighted in light blue and enclosed in a red rectangular box.

TYPE	UNIQUE ID	REGION OR LRE	STATUS	REGISTRATION	STANDARD AND REQ	DUE DATE
Notice of Completion Letter	2023-00159 NO23-000438	MRO	Awaiting your Response	NCR55555 - test confirm name change in MRO	CIP-002-5.1a R1.	
Mitigating Activities	2024-00123	MRO	Resubmit	NCR55555 - test confirm name change in MRO	CIP-002-5.1a R1.	05/31/2024
RFI for Finding	2024-00123 RF24-000818	MRO	Awaiting your Response	NCR55555 - test confirm name change in MRO	CIP-002-5.1a R1.	06/19/2024 Overdue by 12 Days
RFI for EA	2023-00159 RF24-000829	MRO	Awaiting your Response	NCR55555 - test confirm name change in MRO	CIP-002-5.1a R1.	07/31/2024



Responding to an RFI: My Align Dashboard

- 1 Click the **Unique ID** of the RFI
- 2 Add any response to the RFI in the **Respondent Comments** section, this field is required
- 3 If there is evidence submitted to the SEL, check the box next to **Upload to SEL**, follow the instructions in the Evidence section
- 4 Click **Save and Action** if you are ready to submit the RFI response to the CEA and click **Save** if you are still drafting a response

The screenshot shows the 'My Align' dashboard with a 'Request for Information' form open. The form is titled '2024-00123-P | RF24-000818' and contains the following sections:

- Request Details:** Parent Source (2024-00123-P), Applicable Standard/Requirement (CIP-002-5.1a R1), Related Registration (NCR55555 - test confirm name change in MRO), Requestor (MRO Editor 1), Requestor Comments (Draft Test Language), Requestor Attachments, Request Sent On (May 20, 2024), Response Due By (June 19, 2024).
- Respondent Comments*:** A text area for providing a response. A callout '2' points to this section. Below it is a checkbox for 'Upload to SEL' with a checkmark and a callout '3'.
- Evidence:** Instructions for submitting evidence to the SEL. A callout '3' points to the 'Upload to SEL' checkbox.
- Action:** A section with a 'Respond' button and instructions. A callout '4' points to the 'Save and Action' button at the bottom of the form.

In the background, the 'MY TASKS' table is visible with a callout '1' pointing to the 'RFI for Finding' row:

TYPE	UNIQUE ID
<input type="checkbox"/> Notice of Completion	2023-00159 NO23-000438
<input type="checkbox"/> Mitigating Activities	2024-00123
<input type="checkbox"/> RFI for Finding	2024-00123 RF24-000818
<input type="checkbox"/> RFI for EA	2023-00159 RF24-000829



Responding to an RFI: Request for Information Module

A new **Request For Information** module was created to capture all the RFIs that are issued for a Finding (Potential Non Compliance, Enforcement Action), Mitigation, PDS, Self-Certs, and TFE. The user can filter by Parent Source or by RFI status to better manage their RFIs.

- 1 Navigate to the **Request For Information** Module
- 2 Filter by **Parent Source** (Potential Non Compliance, Enforcement Action, Mitigation)
- 3 Filter on **Active RFIs** (Awaiting Response from Entity, Awaiting Region Review, Incomplete) or on **Completed/Cancelled** (Complete, Cancelled)
- 4 Click on unique **RFI ID** to view the RFI request
See RFI Request image in previous slide.

The screenshot shows the 'Request For Information' module interface. Callout 1 points to the 'Request For Information' menu item. Callout 2 points to the 'Parent Source Type' dropdown menu. Callout 3 points to the 'Active RFIs' checkbox. Callout 4 points to the 'RFI ID' column in the table.

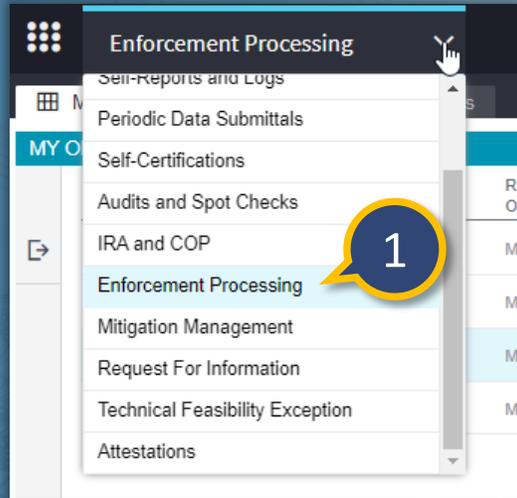
RFI ID	PARENT TYPE	PARENT SOURCE	REGISTRATION	REQUESTOR CONTACT	RESPONDENT CONTACT	REQUEST DATE	RESPONSE DUE BY	ENTITY SUBMISSION DATE	APPLICABILITY	STATUS	MODIFIED BY	MODIFIED ON
RF24-000818	Potential Non Compliance	2024-00123-P	NCR5555 - test confirm name change in MRO			05/20/2024	06/19/2024		CIP-002-5.1a R1.	Awaiting Response from Entity		07/01/2024
RF24-000827	Potential Non Compliance	2024-00146-P	NCR5555 - test confirm name change in MRO			07/01/2024	07/31/2024	07/01/2024	CIP-002-5.1a R1.	Awaiting Region Review		07/01/2024
RF24-000829	Enforcement Action	2023-00159-E	NCR5555 - test confirm name change in MRO			07/01/2024	07/31/2024		CIP-002-5.1a R1.	Awaiting Response from Entity		07/01/2024
RF24-000830	Mitigation	2024-00123	NCR5555 - test confirm name change in MRO			07/01/2024	07/31/2024		CIP-002-5.1a R1.	Awaiting Response from Entity		07/01/2024



Responding to an RFI: Finding Record

For all RFIs issued for a Finding (Potential Non Compliance, Enforcement Action), the registered entity can view the RFI from the Finding record.

- 1 Navigate to the **Enforcement Processing** Module
- 2 Click on unique **Finding ID** to view the Finding record
- 3 Scroll down on the Finding Form to view the RFI section, click on unique **RFI ID** to view the RFI request



MONITORING METHOD	UNIQUE_ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	CREATED BY	MODIFIED BY
Audit	2024-50019	MRO	06/18/2024	NCR5555 - test confirm name change in MRO	CIP-008-6	R1	06/18/2024		
Self-Report	2024-00146	MRO	06/18/2024	NCR5555 - test confirm name change in MRO	CIP-002-5.1a	R1	06/18/2024		
Self-Report	2024-00123	MRO	05/20/2024	NCR5555 - test confirm name change in MRO	CIP-002-5.1a	R1	05/20/2024		
Self-Report	2023-00159	MRO	05/05/2023	NCR5555 - test confirm name change in MRO	CIP-002-5.1a	R1	05/05/2023		

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	REQUEST SENT DATE	REQUEST DUE BY
RF24-000829	MRO Editor 1		07/01/2024	07/31/2024

Page 1 of 1

See RFI request image in previous slide.



Responding to Notification Letters

Notification letters will appear in your My Align dashboard as well as on the Finding record. To view the notification letter on the My Align dashboard, navigate to My Align module.

- 1 Click the **Unique ID** to open the notification (the dashboard view will only show the first identified noncompliance record)
- 2 Enter comments in the **Respondent Comments** field
- 3 If you want to add a **Contestation** response to the disposition, select a response from the **dropdown** (Disagree with Allegation, Disagree with Mitigation requirement, Other, Penalty is too high, Standard and/or Requirement does not apply).

Although the Disposition Object has a Contestation dropdown, you will not always use it for all the Disposition types. Your CEA may provide additional information to specify when/where you should provide a response.

- 4 Add any non-confidential **Attachments**
- 5 View all EAs and PNCs associated with the notification object under the **Related EAs and PNCs** section.
- 6 Click the **Save and Action** to submit notification response to the CEA or click **Save** to save as draft

MY TASKS

TYPE	UNIQUE ID	REGION OR LRE	STATUS	REGISTRATION	STANDARD AND REQ
<input type="checkbox"/>	Notice of Completion Letter	2023-00159 NO23-000438	Awaiting your Response	NCR55555 - test confirm name change in MRO	CIP-002-5.1a R1.
<input type="checkbox"/>	RFI for Finding	2024-00123 RF24-000818	Awaiting your Response	NCR55555 - test confirm name change in MRO	CIP-002-5.1a R1.
<input type="checkbox"/>	Compliance Exception Letter	2023-00159 NO24-000603	Awaiting your Response	NCR55555 - test confirm name change in MRO	CIP-002-5.1a R1.

2023-00159 | NO24-000603

Notification

Type	Compliance Exception Letter	Notification ID	NO24-000603
From	MRO Editor 1	Respondent Comments	<input type="text" value="Respondent Comments - the entity can provide a response to the notification."/>
Sent Date	July 1, 2024	Contestation	<input type="text"/>
Comments	Requestor Comments from the CEA for the registered entity on the Compliance Exception notice.	Response Attachments	<input type="button" value="Attach file"/>
Attachments	11.08 KB	Acknowledged Date	
Response Due Date	July 31, 2024		

Secure Evidence Locker Reference

Secure Evidence Locker Instructions: Submit Evidence or Attachments related to this item via ERO Secure Evidence Locker (SEL) located at https://MRO|NCR55555|VI2023-00159|VI2023-00159,NO24-000603||
If you are hosting your own SEL, please provide a hyperlink to your locker in the comment section above.

Related EAs and PNCs

TYPE	UNIQUEID	METHOD	REQ	STARTDATE	
<input type="checkbox"/>	EA	2023-00159	Self-Report	CIP-002-5.1a R1.	05/05/2023
<input type="checkbox"/>	PNC	2023-00159	Self-Report	CIP-002-5.1a R1.	05/05/2023



Responding to Notification Letters

The Notification letter can also be viewed from the **Finding record**. It is important to note that if there are multiple Enforcement Action violations associated to one disposition object, the notification object will only appear on the main EA violation record under the My Findings Tab.

- 1 Navigate to the **Enforcement Processing** module
- 2 Click on the **Unique ID** of the main EA violation record associated with the Notification letter
- 3 Scroll down to the **Notifications** section on the Finding Record to view the Notification letter

The screenshot shows the software interface with three numbered callouts:

- 1**: A callout points to the 'Enforcement Processing' menu item in the left-hand navigation pane.
- 2**: A callout points to the 'Unique ID' column in the 'MY OPEN FINDINGS' table.
- 3**: A callout points to the 'Notifications' section on the Finding Record page.

MONITORING METHOD	UNIQUE_ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE
<input type="checkbox"/>	Audit	2024-50019	MRO	06/18/2024	NCR55555 - test confirm name change in MRO	CIP-008-6	R1, 06/18/2024
<input type="checkbox"/>	Self-Report	2024-00146		06/18/2024	NCR55555 - test confirm name change in MRO	CIP-002-5.1a	R1, 06/18/2024
<input type="checkbox"/>	Self-Report	2024-00123		05/20/2024	NCR55555 - test confirm name change in MRO	CIP-002-5.1a	R1, 05/20/2024
<input type="checkbox"/>	Self-Report	2023-00159		05/05/2023	NCR55555 - test confirm name change in MRO	CIP-002-5.1a	R1, 05/05/2023

TYPE	UNIQUE ID	RESPOND BY
<input type="checkbox"/> Compliance Exception Letter	NO24-000603	07/31/2024
<input type="checkbox"/> Notice of Completion Letter	NO23-000438	

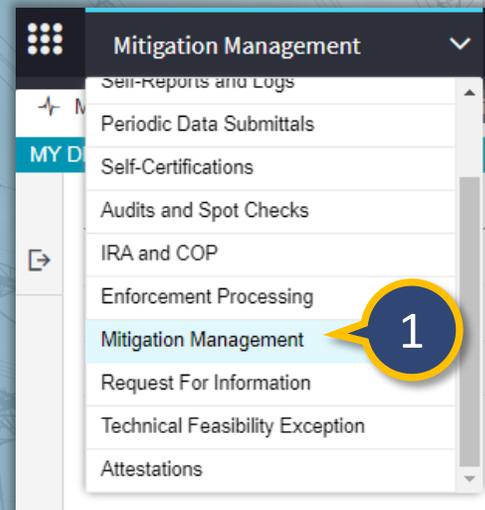
Page 1 of 1



Submitting Mitigating Activities

If you did not create and submit mitigation milestones during the submit finding process (see **Creating a Finding** section on those steps), Align will automatically create a blank draft mitigation record that can be submitted later. If mitigation was submitted to the CEA, you will find the submitted mitigation ID under the **My Active Mitigations** tab.

After you submit mitigating activities or a Mitigation Plan, Align automatically creates a 60-day review period for your CEA, even though the CMEP only requires that review period for Mitigation Plans. If your CEA extends that review period, you will receive an email notification and the due date will update in Align under the **Status** column.



1 Navigate to the **Mitigation Management** module

2 Select the **My Draft Mitigations** tab to see all mitigation records in draft state

- a) Initial Mitigating Activities in Draft
- b) Mitigating Activities in Draft after request for Revision by the CEA
- c) Mitigation Plan in Draft after request for Revision or request to submit as Mitigation Plan by the CEA

3 Locate the mitigation with the same **Unique ID** as your finding and click the Unique ID to open

	TYPE	UNIQUE ID	REGION OR OP	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	START DATE	CREATED BY	MODIFIED BY	MODIFIED ON
a	Mitigating Activities	2023-00159		CR55555 - test confirm name change in MRO	CIP-002-5.1a	R1.	MRO-US	05/05/2023			07/01/2024
b	Mitigating Activities	2024-00124	MRO	NCR55555 - test confirm name change in MRO	CIP-002-5.1a	R2.	MRO-US	07/17/2024			07/17/2024
c	Mitigation Plan	2024-00166	MRO	NCR55555 - test confirm name change in MRO	CIP-002-5.1a	R1.	MRO-US	07/17/2024			07/17/2024
	Mitigating Activities	2024-50019	MRO	NCR55555 - test confirm name change in MRO	CIP-008-6	R1.	MRO-MB	06/18/2024			06/18/2024



Submitting Mitigating Activities

If you did not submit a mitigation when you submitted the finding, the draft view will have an additional field **Registered Entity Contact** that would allow the registered entity to indicate any relevant contacts for the CEA.

- 4 Click the **link** icon in the Entity Contact section
- 5 Click the **checkbox** next to the correct contact
- 6 Click **Confirm**



Submitting Mitigating Activities

If you did not submit a mitigation when you submitted the finding, the draft view will have an additional field **Interim Risk Reduction** that would be useful to complete for mitigating activities or required to submit for formal Mitigation Plans. The registered entity must include steps that will reduce or eliminate risk to the BPS while it is implementing mitigation.

2024-00146

General Information

Type	Mitigating Activities	Related PNC	2024-00146	CEA	MRO
Registration	NCR5555 - test confirm name change in MRO				
Applicable Requirement	CIP-002-5.1a R1.				
Applicable Part(s)	CIP-002-5.1a R1.3.; CIP-002-5.1a R1.2.; CIP-002-5.1a R1.1.				
Applicable Reliability Function(s)	GO; TO				
Region-Jurisdiction(s) in which the Potential Noncompliance occurred	MRO-US				
Root Cause	Not available; PNC Review not yet complete.				
Interim Risk Reduction					

Mitigation Milestones

<input type="checkbox"/>	MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
This table is empty						

Instructions: 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 the mitigating activities described above, I acknowledge that I have authority to submit the mitigating activities on behalf of the Registered Entity.

Action:

Save and Action
Save
Close

7 Enter any **Interim Risk Reduction** measures that you are taking

To add milestones, scroll down to the **Mitigation Milestones** section

8 Click the **+** icon to add a milestone



Submitting Mitigating Activities

9 Select the **Type of Milestone Task** from the dropdown list

10 Enter a **Milestone Name** (do not include any sensitive information in the milestone name)

11 Enter a **Milestone Description**

The **Type of Milestone Task** and **Planned Completion Date** fields are the only fields required by Align. However, your CEA will also look for a description of the activities in the Description of action field. If you send a mitigation with just dates and milestone types without any description of activities, your CEA will send it back for redrafting.

The registered entity should include all milestone activities that have already been performed or that the entity will perform to mitigate the noncompliance and prevent recurrence.



Submitting Mitigating Activities

If the milestone has been completed, please add the **Actual Completion Date**. The Actual Completion Date cannot be a future date, so only include the completion date if the milestone has been completed.

- 12 Select the **Planned Completion Date**
- 13 Select the **Actual Completion Date** (if known and already completed)
- 14 Click the **Update** button to save the milestone

The screenshot shows a 'Milestone' form with the following sections:

- Milestone Information**
 - Type of Milestone Task: Preventative Control
 - Milestone Name: Milestone Name Task 2
 - Description of action: Detailed Description of Milestone Name Task 2
 - Planned Completion Date: 06/06/2024 (Callout 12)
 - Actual Completion Date: (Callout 13)
- Evidence and Attachments**
 - Data Locker Instructions: Evidence and Attachments must be submitted via Data Locker with a reference number that will be generated when you submit this Milestone and its parent Mitigation.
 - Evidence Comments: (Empty text area)

At the bottom of the form, there is an **Update** button (Callout 14) and a **Close** button.



Submitting Mitigating Activities

In the draft status, if you are unable to remove the actual or planned completion date upon save, you might need to create a new milestone record and delete the old record until a future release resolves this issue. To **delete** a milestone task, click on the check box next to the milestone task and then click the **'delink'** button

15 If you want to save the data you have entered without submitting, click the **Save** button

16 Select the **Submit for CEA Review** option from the Action dropdown

17 If you are ready to submit the mitigating activities, click the **Save and Action** button

Mitigation Milestones

	MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
+	<input type="checkbox"/>	Corrective Control	Milestone Name Task 1	06/01/2024		05/31/2024
⌘	<input type="checkbox"/>	Preventative Control	Milestone Name Task 2	06/06/2024		

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

16 **Action**

Save and Action
Save
Close

17

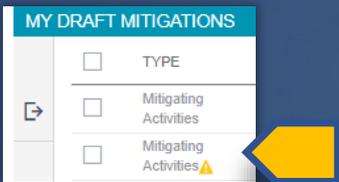
15

Mitigation Status Progression



The mitigation record moves through the following stages.

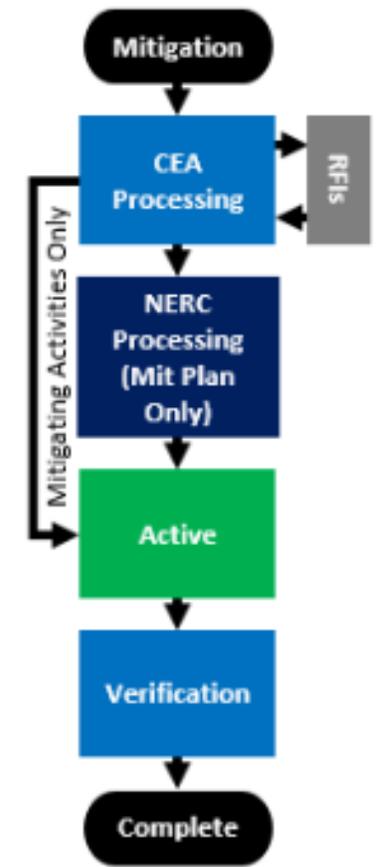
1) Draft – The **My Draft Mitigations** tab (a) shows you all mitigation records that are in the ‘Draft’ state. This includes any mitigation records that are newly created or records that have been sent back to the entity for revisions. If your CEA requests revision on the mitigation record or converts the mitigation record from Mitigating Activities to Mitigation Plan, the record will show on the ‘My Draft Mitigations’ tab. Also, when NERC’s review results in the rejection of a Mitigation Plan, it will show on the ‘My Draft Mitigations’ tab. Any record that has been sent back to the entity will have a **yellow triangle** next to the record.



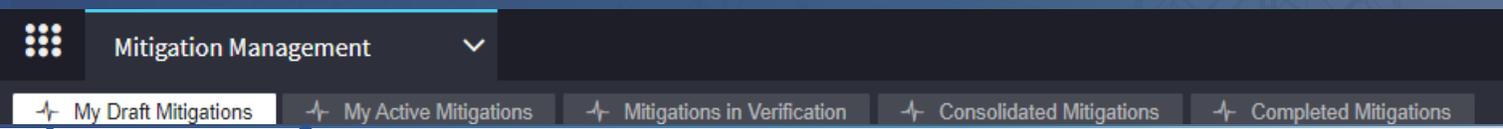
2) CEA Processing - This status indicates that the CEA is reviewing the mitigation that you submitted. You may receive RFIs during this stage to help the CEA complete its review. The record will show on the **My Active Mitigations** tab (b).

3) NERC Processing - If your CEA converts your mitigating activities to a Mitigation Plan, it will undergo NERC review after you re-submit it. The record will show on the **My Active Mitigations** tab.

4) Active - Once your mitigation is approved, it will show as Active. While in this stage, you can complete milestones, request milestone extensions, and add scope expansion, but if you need to edit anything else (modify the milestone details or add/remove a milestone record), you will need to have your CEA send it back for a revision. The record will show on the **My Active Mitigations** tab. You cannot notify the CEA that you have completed all the mitigation actions until the mitigation record is in the Active state. For it to be in the Active state for Mitigating Activities, the CEA has to have accepted the Mitigating Activities. For it to be in the Active state for formal Mitigation Plans, the CEA has to have accepted the Mitigation Plan and NERC has to have approved the Mitigation Plan.



Mitigation Process Summary



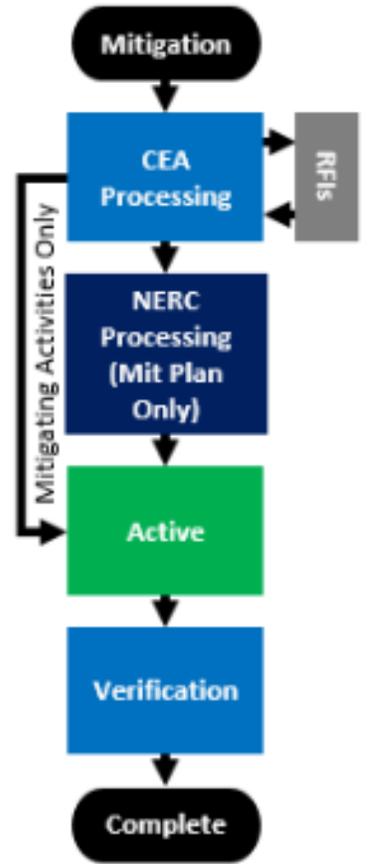
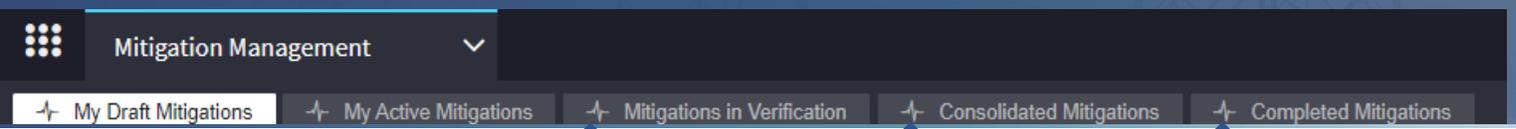
Mitigation Status Progression

5) Verification - Once you complete all milestones, and the mitigation record is in the Active state you will submit the mitigation for verification review by the CEA. The status will change to Verification and the mitigation will no longer be editable. You may receive RFIs during this stage as well. The record will show on the **Mitigations in Verification** tab (c).

6) Incomplete - If your mitigation does not pass Verification Review, your CEA will send it back as 'Incomplete.' Unlike other revisions, this will show up on the **My Active Mitigations** tab rather than in your 'My Draft Mitigations' tab and will indicate a status of 'Active Returned as Incomplete'.

7) Complete - Once a mitigation record has been marked Complete or Verified Completed by your CEA, its status will change to Complete and will show on the **Completed Mitigations** tab (e).

8) If the CEA **consolidates** a PNC record into an existing EA record, the mitigation record for the consolidated issue will show on the **Consolidated Mitigations** tab (d). If consolidation takes place, the registered entity will need to work with the CEA to modify the mitigation record to take into account all milestone activities for each of the noncompliance.



Mitigation Process Summary



Updating Mitigations: Mitigation RFIs

If your CEA needs more information to complete their review of your mitigation record, they may send an **RFI for Mitigation**. If your CEA sends an RFI, it will not change the status of the mitigation record, but you will see the RFI appear on your My Align dashboard, the mitigation record, and the Request for Information module. To respond:

- 1 Click the **Unique ID** of the RFI for Mitigation on My Align dashboard (a copy of the RFI is also visible from the mitigation record and the Request for Information module)
- 2 Enter any comments into the **Respondent Comments** field
- 3 If you have any evidence that needs to be uploaded to the SEL, upload the evidence using the reference number provided and check the box next to **Upload to SEL**
- 4 Click **Save and Action** if you are ready to submit the RFI response to the CEA and click **Save** if you are still drafting a response

2024-00123 | RF24-000830

Request for Information

Parent Source: 2024-00123
 Applicable Standard/Requirement: CIP-002-5.1a R1.
 Related Registration: NCR55555 - test confirm name change in MRO
 Requestor: MRO Editor 1
 Requestor Comments: test
 Request Attachments:
 Request Sent On: July 1, 2024
 Response Due By: July 31, 2024

Respondent Comments*
 Respondent Comments: This is where the registered entity can provide a response. In the checkbox below "Upload to SEL" is where the registered entity can indicate if they have uploaded evidence to the SEL.

Note: You cannot proceed in the workflow until the Respondent Comments are filled in. If evidence is submitted to the SEL, please check the box for Upload to SEL.

Upload to SEL

Evidence

Secure Evidence Locker Instructions: Submit Evidence or Attachments related to this item via ERO Secure Evidence Locker (SEL) located at <https://eusstg.eroenterprise.com/nerc-infrastructure> with the following reference number:
 For evidence related to CIP-002-5.1a R1, use: MRO|NCR55555|VI2024-00123|VI2024-00123,RF24-000830|CIP-002-5.1a|R1.
 If you are hosting your own SEL, please provide a hyperlink to your locker in the comment section above.

Action

Action: Respond
 Save and Action will acknowledge receipt of this Request and send back any response you have provided. Save will store any response you have provided, but will neither acknowledge receipt of this Request nor send any response.

Save and Action Save Close

TYPE	UNIQUE ID	REGISTRATION	STATUS	STANDARD AND REQ
<input type="checkbox"/>	Notice of Completion Letter	2023-00159 NO23-000438	Awaiting your Response	CIP-002-5.1a R1.
<input type="checkbox"/>	RFI for Finding	2024-00123 RF24-000818	Awaiting your Response	CIP-002-5.1a R1.
<input type="checkbox"/>	Mitigating Activities	2024-00123	Resubmit	CIP-002-5.1a R1.
<input type="checkbox"/>	Compliance	2023-00159 NO24-000603	Awaiting your Response	CIP-002-5.1a R1.
<input type="checkbox"/>	RFI for EA	2023-00159 RF24-000829	Awaiting your Response	CIP-002-5.1a R1.
<input type="checkbox"/>	RFI for Mitigation	2024-00123 RF24-000830	Awaiting your Response	CIP-002-5.1a R1.



Updating Mitigations: Submitting Mitigation Plans

If your CEA decides that the **Mitigating Activities** you submitted need to be converted into a **Mitigation Plan**, they will send it back to you to resubmit.

To open the **Mitigation Plan**, EITHER:

1 Click the **Unique ID** of the **Mitigation Plan** on the My Align dashboard (status will be 'Submit as Mitigation Plan')

...OR...

2 Go to the **My Draft Mitigations** tab and click the **Unique ID** of the Mitigation Plan. As with Mitigation Plans, if your CEA returns a mitigating activity for resubmission, Align will show the **yellow triangle** icon to alert that it was returned

If your CEA asks you to resubmit a mitigation record, they will include an explanation for the request in the **Review Results and Due Date section (a)**.

My Align

My Dashboard and Tasks

Assigned To Me

WELCOME TO ALIGN, THE COMPREHENSIVE TOOL DESIGNED AS A SHARED PLATFORM FOR THE ERO ENTERPRISE COMPLIANCE MONITORING AND ENFORCEMENT PROGRAM. THIS IS HOW YOU MANAGE MITIGATION, SUBMIT AND/OR RESPOND TO PERIODIC DATA SUBMITTALS, SELF-CERTIFICATIONS, AND TECHNICAL FEASIBILITY EXCEPTIONS. YOU CAN ALSO RESPOND TO COMPLIANCE OVERSIGHT PLANS. TRAINING MATERIALS FOR EACH MODULE ARE AVAILABLE AT <https://training.nerc.net/>

TYPE	UNIQUE ID	REGION OR LRE	STATUS
Mitigation Plan	2024-00123	MRO	Submit as Mitigation Plan
Notice of Completion Letter	2023-00159 NO23-000438	MRO	Awaiting your Response
RFI for Finding	2024-00123 RE24-000818	MRO	Awaiting your Response

Mitigation Management

My Draft Mitigations | My Active Mitigations | Mitigations in Verification | Consol

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION
Mitigating Activities	2023-00159	MRO	NCR55555 - test confirm name change in MRO
Mitigation Plan	2024-00123	MRO	NCR55555 - test confirm name change in MRO
Mitigating Activities	2024-00146	MRO	NCR55555 - test confirm name change in MRO
Mitigating Activities	2024-50019	MRO	NCR55555 - test confirm name change in MRO

2024-00123

General Information

Type: Mitigation Plan

Registration: NCR55555 - test confirm name change in MRO

Applicable Requirement: CIP-002-5.1a R1.

Applicable Part(s): CIP-002-5.1a R1.3.; CIP-002-5.1a R1.2.; CIP-002-5.1a R1.1.

Applicable Reliability Function(s): GO, TO

Region-Jurisdiction(s) in which the Potential Noncompliance occurred: MRO-US

Entity Assigned to

FIRST NAME

Review Results and Due Date

Region Review Results: Submit as Mitigation Plan

CEA Comments: The CEA requests that this mitigation record be converted to a Mitigation Plan.

New Submission Due Date

Root Cause and Interim Risk Reduction

Save and Action | Save | Close



Updating Mitigations: Submitting Mitigation Plans

- 1 Click the **Link** icon to add a **Registered Entity Contact** (required for Mitigation Plans)
- 2 Enter an **Interim Risk Reduction** statement (required for Mitigation Plans, but the entity should include steps that will reduce or eliminate risk to the BPS while it is implementing mitigation)
- 3 Add any milestones or other information requested by your CEA. Then, select **Submit for CEA Review** from the Action dropdown
- 4 Click **Save and Action** if you are ready to submit the mitigation record to the CEA for review and click 'Save' if you are still drafting the record

General Information

Type	Mitigation Plan	Related PNC	2024-00123	CEA	MRO
Registration	NCR55555 - test confirm name change in MRO				
Applicable Requirement	CIP-002-5.1a R1.				
Applicable Part(s)	CIP-002-5.1a R1.3 ; CIP-002-5.1a R1.2 ; CIP-002-5.1a R1.1.				
Applicable Reliability Function(s)	GO; TO				
Region-Jurisdiction(s) in which the Potential Noncompliance occurred	MRO-US				

Registered Entity Contact Please provide a point of contact for this mitigation.

<input type="checkbox"/> FIRST NAME	LAST NAME
<input type="checkbox"/> NCR55555 Editor	1

Entity Assigned to

<input type="checkbox"/> FIRST NAME	LAST NAME
This table is empty	

Review Results and Due Date

Region Review Results	Submit as Mitigation Plan
CEA Comments	The CEA requests that this mitigation record be converted to a Mitigation Plan.
New Submission Due Date	

Root Cause and Interim Risk Reduction

Root Cause: Not available; PNC Review not yet complete.

Interim Risk Reduction

Paragraph Helvetica Neue 14px

Interim Risk Reduction - The registered entity must include steps that will reduce or eliminate risk to the BPS while it is implementing mitigation. The risk reduction steps must be specific for the risks identified. This step is especially critical for mitigation with longer durations. For formal Mitigation Plans, the registered entity must include the anticipated impact of the Mitigation Plan on the BPS reliability and an action plan to mitigate any increased risk to the reliability of the BPS while the Mitigation Plan is being implemented. It should include those steps that the registered entity has implemented and are in place to reduce or eliminate risk to the BPS.

Instructions

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.

Action: Submit for CEA Review

Save and Action
Save
Close

[Home](#) |
 [Previous Page](#) |
 [Next Page](#)



Updating Mitigations: Milestone Extension Requests

To request a mitigation milestone extension:

- 1 Navigate to your **My Active Mitigations**
- 2 Click on the relevant **mitigation record** to highlight it (do not click the Unique ID, so click on any place in the row except the hyperlink)
- 3 Click the **+** button in the **Request Extension** column for the milestone you need to extend

Align will allow you to submit a milestone extension request after the milestone due date, but you should try to submit these requests at least five days prior to the due date per the CMEP.

Milestone extension requests can only be requested on milestones without actual completion dates. If you already have an actual completion date that is no longer accurate, you will need to first remove the actual completion date for that milestone in the 'Related Milestones' portlet and save that milestone record. Upon refreshing the 'Related Milestones' portlet the '+' icon should appear under the Request Extension column.

Mitigation Management

My Draft Mitigations | My Active Mitigations | Mitigations in Verification | Consolidated Mitigations | Completed Mitigations

MY MITIGATING ACTIVITIES AND MITIGATION PLANS

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	DATE SUBMITTED	COMPLETION DATE	STANDARD /REQ	REGION AND JURISDICTION	START DATE
Mitigating Activities	2024-00146	MRO	NCR55555 - test confirm name change in MRO	07/03/2024		CIP-002-5.1a R1.	MRO-US	06/18/2024

Page 1 of 1

RELATED MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION	CREATED BY	MODIFIED BY	MODIFIED ON
Corrective Control	2024-00146 MS24-00527	Milestone Name Task 1	06/01/2024	05/31/2024				07/02/2024
Preventative Control	2024-00146 MS24-00528	Milestone Name Task 2	06/06/2024		+			07/02/2024



Updating Mitigations: Milestone Extension Requests

4 Enter your **Proposed New Planned Completion** for the milestone

5 Provide an **Explanation** for the proposed change

6 Click **Update** to submit

If your CEA approves the milestone extension request, Align will send you an email notification and you will see the updated planned completion date on the mitigation record. If your CEA rejects the milestone extension request, they will contact you to indicate the request was rejected, and the milestone will continue to have the original planned completion date.

The screenshot shows a web form titled "Create Milestone Extension Request". The form contains the following fields and values:

- Mitigation: 2024-00146
- Related Milestone: 2024-00146 | MS24-00528
- Milestone Name: Milestone Name Task 2
- Compliance Enforcement Authority: MRO
- Proposed New Planned Completion: 07/15/2024
- Explanation: Milestone Extension Request Explanation - needed additional time to perform this task.

Callout 4 points to the "Proposed New Planned Completion" date field. Callout 5 points to the "Explanation" text area. Callout 6 points to the "Update" button at the bottom of the form.



Updating Mitigations: Completing Milestones

When you have completed all the mitigation actions, you can certify completion by putting in the actual completion dates for the milestones. This will auto-populate the completion date for that milestone on the mitigation record. As you complete mitigation milestones, you'll need to indicate the **completion date** in Align. To do this:

- 1 Open the **mitigation record** from the **My Active Mitigations** tab
- 2 Scroll to the **Mitigation Milestone** section and click the **Milestone ID**
- 3 Enter the **Actual Completion Date**
- 4 Click the **Save** button

When you have completed all the mitigation actions, you can certify completion by putting in the actual completion dates for milestones. This will auto-populate the **Entity Completion Date** on the mitigation record.

Mitigation Management

My Draft Mitigations | My Active Mitigations | Mitigations in Verification | Consolidated Mitigations | Completed Mitigations

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	DATE SUBMITTED	COMPLETION DATE
Mitigating Activities	2024-00146	MRO	NCR55555 - test confirm name change in MRO	07/03/2024	

2024-00146

Review Results

Region Review Results: Accept

CEA Comments

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE
MS24-00527	Corrective Control	Milestone Name Task 1	06/01/2024
MS24-00528	Preventative Control	Milestone Name Task 2	06/06/2024

Note: Once all milestones have been completed make sure you submit for CEA Verification.

2024-00146 | MS24-00528

Milestone Information

Type of Milestone Task: Preventative Control

Milestone Name: Milestone Name Task 2

Description of Task: Detailed Description of Milestone Name Task 2

Planned Completion Date: June 6, 2024

Revised Completion Date: [Empty]

Actual Completion Date: 06/04/2024

Evidence

Secure Evidence Locker Instructions: Submit Evidence or Attachments related to this item via ERMRO|NCR55555|VI2024-00146|VI2024-00146,MI2024-00146

Evidence Comments: [Empty]

click [here](#) to print

MS24-00528 FORM: RegMilestone

4 Save Close



Updating Mitigations: Removing a Milestone Completion Date

If you need to remove the actual completion date from a milestone, you can delete it and Save, or it can be modified to a different date and Saved.

To do this:

1. Navigate to the **My Active Mitigations** tab and **highlight the row** of the mitigation record you want to remove the actual completion date (do not click on the Unique, so click on any place in the row except the hyperlink)
2. Find the milestone that you want to remove the actual completion date for in the **Related Milestones** portlet at the bottom of the page and Click on the **Unique ID** of the milestone ID
3. Delete the **Actual Completion Date**
4. Click **Save**
5. On the 'Related Milestones' portlet, you will need to refresh the portlet and then you will see that the completion date for that milestone has been removed and the Request Extension + button has appeared

The screenshot shows the 'Mitigation Management' interface. At the top, there are tabs for 'My Draft Mitigations', 'My Active Mitigations', 'Mitigations in Verification', 'Consolidated Mitigations', and 'Completed Mitigations'. The 'My Active Mitigations' tab is selected, showing a table of 'MY MITIGATING ACTIVITIES AND MITIGATION PLANS'. A row is highlighted with a circled '1'. Below this table is a 'RELATED MILESTONES' portlet with a table containing two rows. The second row is highlighted with a circled '2'. A modal window titled '2024-00146 | MS24-00528' is open, showing 'Milestone Information'. The 'Actual Completion Date' field is highlighted with a red box and a circled '3'. At the bottom of the modal, there is a 'Save' button highlighted with a circled '4'. Below the modal, another 'RELATED MILESTONES' portlet shows a confirmation message 'Action succeeded' and a table where the 'Actual Completion Date' for the second row is empty and has a '+' button next to it, highlighted with a circled '5'.



Updating Mitigations: Scope Expansions

If your mitigation expands the scope of the issue:

- 1 Select **Yes** from the scope expansion dropdown
- 2 Enter an **Explanation** for why the scope has expanded

Has the scope of this issue expanded as a result of these mitigation steps? **Yes**

Explanation **2**

Action * **Submit for CEA Verification**

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.

Save and Action **Save** **Close**



Updating Mitigations: Submitting for Verification Review

Once you have completed your mitigation milestones, you'll submit the mitigation to your CEA for verification:

1 Select **Submit for CEA Verification** from the Action dropdown

2 Click the **Save and Action** button

Has the scope of this issue expanded as a result of these mitigation steps? Yes

Explanation

Paragraph Helvetica Neue 14px Timestamp

Explanation for the scope expansion

Action* **Submit for CEA Verification**

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.

Save and Action Save Close



Updating Mitigations: Complete Status

After the entity submits the mitigation for Verification review, the record will appear on the **Mitigations in Verification** tab. If the CEA issues any RFIs during this review, the entity can access the RFI on this tab.

1 Navigate to the **Mitigations in Verification** tab to view all the mitigation records that are in the Verification review state with the CEA

2 Click the **Unique ID** to view the mitigation record

If your CEA marks the mitigation record as Complete or Verified Complete, it will show up as Complete on your **Completed Mitigations** tab.

3 Navigate to the **Completed Mitigations** tab to view all the mitigation records that are in the complete state (this includes mitigation records tied to failed preliminary screens, and dismissals)

4 Click the **Unique ID** to view the mitigation record to view any comments in the 'Review Results and Due Date' section or the 'Verification' section.

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD / REQ	REGION AND JURISDICTION	DATE SUBMITTED
Mitigating Activities	2024-00146	MRO	NCR55555 - test confirm name change in MRO	CIP-002-5.1a R1.	MRO-US	07/03/2024

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD / REQ	REGION AND JURISDICTION	DATE SUBMITTED
Mitigating Activities	2024-00146	MRO	NCR55555 - test confirm name change in MRO	CIP-002-5.1a R1.	MRO-US	07/03/2024

Review Results and Due Date

Region Review Results	Accept	NERC Review Results	
CEA Comments	Comment tied to Verified Complete Action - The CEA has confirmed this has been completed by reviewing the evidence. Comment tied to Incomplete Verification Action - The CEA determined that the Verification Review indicates the mitigation milestones dates do not match the evidence, please modify MS24-00528 with 7/1/2024 to reflect the evidence date. Comment tied to Revision Request - As part of the Verification review, the CEA has determined that the milestones need to be modified, please review and add a milestone to address the prevention of recurrence.	NERC Comments	

Verification

CEA Verification Action	Verified Complete
Verification Comments Shared with Entity	7/3/2024 Comment tied to Verified Complete Action - The CEA has confirmed this has been completed by reviewing the evidence. 7/1/2024 Comment tied to Incomplete Verification Action - The CEA determined that the Verification Review indicates the mitigation milestones dates do not match the evidence, please modify MS24-00528 with 7/1/2024 to reflect the evidence date.



Updating Mitigations: Incomplete Status

If your CEA determines there is an issue with the Verification review, your CEA will send it back for you to address any concerns.

1 Navigate to the **My Active Mitigations** tab and click the **Unique ID** of the Incomplete mitigation, the status will show as 'Active Returned as Incomplete'

2 Scroll down to the **Verification** section, read the CEA's comments and update the mitigation according to the comments

3 To resubmit for Verification review, select **Submit for CEA Verification** in the action dropdown and then click the **Save and Action** button

Mitigation Management

My Draft Mitigations | My Active Mitigations | Mitigations in Verification | Consolidated Mitigations | Completed Mitigations

MY MITIGATING ACTIVITIES AND MITIGATION PLANS

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	DATE SUBMITTED	COMPLETION DATE	STANDARD /REQ	REGION AND JURISDICTION	START DATE	STATUS
Mitigating Activities	2024-00146	MRO	NCR55555 - test confirm name change in MRO	07/03/2024	07/03/2024	CIP-002-5.1a R1.	MRO-US	06/18/2024	Active Returned as Incomplete

Verification

CEA Verification Action: Incomplete

Verification Comments Shared with Entity: The CEA determined that the Verification Review indicates the mitigation milestones dates do not match the evidence, please modify MS24-00528 with 7/1/2024 to reflect the evidence date.

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
MS24-00527	Corrective Control	Milestone Name Task 1	06/01/2024		05/31/2024
MS24-00528	Preventative Control	Milestone Name Task 2	06/06/2024		07/01/2024
MS24-00529	Preventative Control	Milestone task 3	07/01/2024		07/01/2024

Note: Once all milestones have been completed make sure you submit for CEA Verification.

Action *

Save and Action | Save | Close



Updating Mitigations: Incomplete Status

If the CEA determines that the mitigation milestones need to be modified to address the verification, the CEA will first indicate that the Verification was found to be Incomplete and then the CEA will request a revision, which will send the mitigation record back to the **My Draft Mitigations** tab.

4 Navigate to the **My Draft Mitigations** tab and click the **Unique ID** of the mitigation record, the record will have a **yellow triangle** indicating it has been sent back for revision

5 Scroll down to the **Review Results** section to read the CEA's comments and update the mitigation according to the comments

6 To resubmit for CEA review, select **Submit for CEA Review** in the action dropdown and then click the **Save and Action** button

Mitigation Management

My Draft Mitigations | My Active Mitigations | Mitigations in Verification | Consolidated Mitigations | Completed Mitigations

MY DRAFT MITIGATIONS

	TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	START DATE
<input type="checkbox"/>	Mitigating Activities	2024-00146	MRO	NCR55555 - test confirm name change in MRO	CIP-002-5.1a	R1.	MRO-US	06/18/2024

Review Results

CEA Comments As part of the Verification review, the CEA has determined that the milestones need to be modified, please review and add a milestone to address the prevention of recurrence.

Mitigation Milestones

	MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
<input type="checkbox"/>	MS24-00527	Corrective Control	Milestone Name Task 1	06/01/2024		05/31/2024
<input type="checkbox"/>	MS24-00528	Preventative Control	Milestone Name Task 2	06/06/2024		07/03/2024
<input type="checkbox"/>		Preventative Control	Milestone task 3	07/01/2024		07/01/2024

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

Action:

Save and Action Save Close



Updating Mitigations: Consolidated Mitigations

If your CEA consolidates more than one of your findings under the same Enforcement Action, only one of the mitigations associated with those findings will stay active. The rest will move to the **Consolidated Mitigations** tab.

- 1 Click the **Unique ID** of any consolidated mitigation to review
- 2 All consolidated mitigations are read-only, so you cannot edit anything at this point. However, Align preserves the mitigation in case you need to copy any information from the consolidated mitigation into the active mitigation

If you need to add information from a consolidated mitigation to an active one, your CEA will need to send the active mitigation back to you as a revision. Like all revisions, the mitigation will appear on your **'My Draft Mitigations'** tab with the **yellow triangle** icon.

- 3 Click the **Unique ID** to open the mitigation record and add any information that was on the consolidated mitigations but not on the active mitigation
- 4 Select **Submit for CEA Review** from the Action dropdown
- 5 Click **Save and Action**

Mitigation Management

My Draft Mitigations | My Active Mitigations | Mitigations in Verification | **Consolidated Mitigations** | Completed Mitigations

CONSOLIDATED MITIGATIONS

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	DATE SUBMITTED	STANDARD	REQ	REGION AND JURISDICTION	START DATE	STATUS
Mitigation Plan	2024-00123	MRO	NCR55555 - test confirm name change in MRO	07/02/2024	CIP-002-5.1a	R1	MRO-US	05/20/2024	Consolidated

1

2

2024-00123

Review Results

CEA Comments: The CEA requests that this mitigation record be converted to a Mitigation Plan.

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
MS24-00518	Remediating Action	Draft Test Language	05/20/2024		

Note: 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.

Instructions: **THE RELATED NONCOMPLIANCE HAS BEEN CONSOLIDATED.** Review the Mitigation for the Finding under which the noncompliance was consolidated to confirm it includes appropriate Mitigations to address the circumstances of this Finding.

Action

Mitigation Management

My Draft Mitigations | My Active Mitigations | Mitigations in Verification | Consolidated Mitigations | Completed Mitigations

MY DRAFT MITIGATIONS

TYPE	UNIQUE ID
Mitigating Activities	2024-00146

Review Results

CEA Comments: As part of the Verification review, the CEA has determined that the milestones need to be modified, please review and add a milestone to address the prevention of recurrence.

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
MS24-00527	Corrective Control	Milestone Name Task 1	06/01/2024		05/31/2024
MS24-00528	Preventative Control	Milestone Name Task 2	06/06/2024		07/03/2024
	Preventative Control	Milestone task 3	07/01/2024		07/01/2024

Instructions: When ready for Region Review authority to submit the mitigating activities, please submit the Mitigation by selecting the "Submit for CEA Review" Action and clicking "Save and Action" below. By submitting the mitigating activities described above, I acknowledge that I have read and understand the terms of the Mitigation.

Action: **Submit for CEA Review**

Save and Action | Save | Close

3

4

5



Updating Mitigations: Consolidated Mitigations

If the CEA consolidates a finding, the registered entity will receive an email indicating the finding that it was consolidated into.

The registered entity can also search for consolidated records under the **Enforcement Processing** drop down under the 'My Open Findings' or the 'My Closed Findings' tab. If a consolidation took place, the registered entity can see this in the Unique ID column.

Enforcement Processing

My Open Findings | My Closed Findings

MY OPEN FINDINGS

<input type="checkbox"/>	MONITORING METHOD	UNIQUE ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	CREATED BY	MODIFIED BY
<input type="checkbox"/>	Self-Report	2024-00146 (Consolidation)	MRO	06/18/2024	NCR55555 - test confirm name change in MRO	CIP-002-5.1a	R1.	06/18/2024		



1. Navigate to the **Enforcement Processing** module and find the **Unique ID** on the 'My Open Findings' or the 'My Closed Findings' tab. The Unique ID column will indicate a consolidation took place.

CONSOLIDATED FINDINGS

<input type="checkbox"/>	TYPE	UNIQUE ID	STANDARD AND REQUIREMENT
<input type="checkbox"/>	Self-Report	2024-00123	CIP-002-5.1a R1.



2. To view the consolidated finding, click on the Unique ID and scroll down to the **'Consolidated Findings'** section

2024-00123

Monitoring Method: Self-Report

General Information

Registration: NCR55555 - test confirm name change in MRO

Applicable Requirement: CIP-002-5.1a R1. Region - Jurisdiction in which the Potential Noncompliance occurred: MRO-US

Applicable Part(s): CIP-002-5.1a R1.3, CIP-002-5.1a R1.2, CIP-002-5.1a R1.1. Other Region - Jurisdiction(s) where you are reporting this Potential Noncompliance:

Applicable Reliability Function(s): GO TO

Assigned to:

Assigned To:

Discovery and Description

When was the Potential Noncompliance discovered?: 05/20/2024. When did the Potential Noncompliance start?: 05/20/2024

How was this Potential Noncompliance discovered?: Draft Test Language. What is the basis for your selecting this start date?: Draft Test Language

Please describe the Potential Noncompliance in detail: Draft Test Language. Is the Potential Noncompliance still occurring?: No. When did you return to compliance?: 05/20/2024

Extent of Condition and Root Cause

Close

3. Click on the **Unique ID** to view the consolidated finding details

Emails



Emails associated with the **Finding Record** are sent to the PCC and ACCs

- New Finding has been submitted
- Registered Entity Notification that PNC has passed screening
- Registered Entity has been sent a Notification for EA For Your Awareness
- Registered Entity receives notification CE/FFT has been completed for EA
- Notification of Completion of Enforcement Action (Settlement/NOCV) for EA
- Consolidation - PNC has been linked to an existing EA
- Finding RFIs - Review and Respond to RFI
- Finding RFIs marked Incomplete - Review CEA Comments on RFI and Submit Revised Response

Emails associated with the **Mitigation Record** are sent to the PCC and ACCs

- CEA has rejected a Mitigation Plan/Mitigating Activity (CEA Review to Draft)
- CEA has rejected a Mitigation Plan/Mitigating Activity (Active to Draft)
- Mitigating Activities have been Converted to Mitigation Plan - Action Required
- CEA Mitigation Plan Review Period Extension
- NERC Mitigation Plan Review Period Extension
- CEA Mitigating Activities Acceptance
- CEA Mitigation Plan Acceptance
- Registered Entity Notification of NERC Mitigation Plan Approval
- CEA Mitigation Plan/Mitigating Activity Certification Rejection
- CEA Accepted Mitigation Plan/Mitigating Activity Completion
- CEA Completed Mitigation Plan/Mitigating Activity Verification
- CEA has selected a Completed Mitigation Plan/Mitigating Activity for verification
- Mitigation Milestone date changed
- Mitigation RFIs - Review and Respond to RFI