

Align TFE Instructions

July 14, 2021



**MIDWEST
RELIABILITY
ORGANIZATION**

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INTRODUCTION

The purpose of this document is to outline steps that registered entities should follow to perform the following actions on their Technical Feasibility Exceptions (TFEs) within Align:

- Submit new TFEs
- Submit Material Change Reports (MCRs) for existing TFEs
- Update existing TFEs with non-material changes
- Provide supporting documentation through the ERO Secure Evidence Locker (SEL)
- Terminate TFEs that are no longer needed

For any questions related to TFEs, please contact tfe@mro.net.

TARGET AUDIENCE

Registered entities that have Cyber Assets in their CIP program where Technical Feasibility Exceptions (TFEs) are applicable.

ACCESSING ALIGN & SEL

All users must have an [ERO Portal Account](#) to access Align and the SEL. Prior to go-live, NERC ensured Primary Compliance Contacts (PCCs) at registered entities with ERO Portal Accounts were set up as an “Align Registered Entity Submitter”, “SEL Submitter”, and “Entity Administrator”.

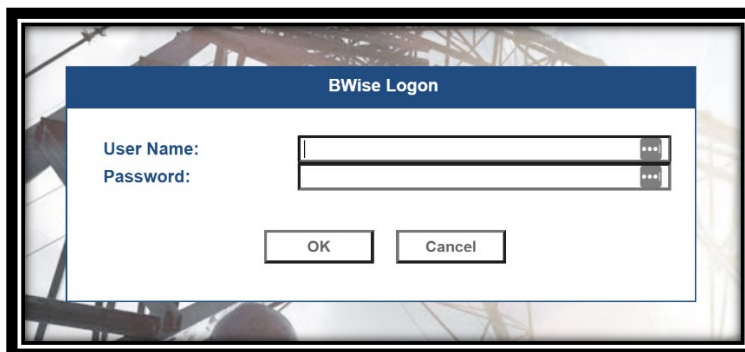
Once an ERO Portal Account has been created, access to Align will be requested through the portal. The PCC, or designated Entity Administrator is responsible for approving access requests.

For additional detailed information on setting up and administering access to Align and the SEL, please see the [Registered Entities: User Access Guide](#) located on the [NERC Learning website](#). The NERC Learning website also contains helpful training materials and videos related to the TFE process.

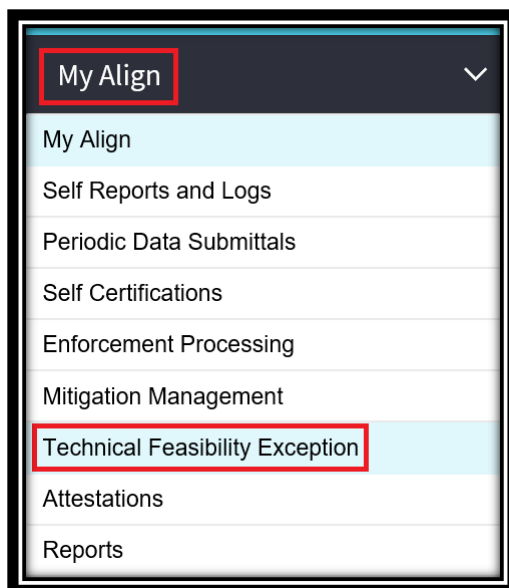


ACCESSING TFE PORTLET WITHIN ALIGN

From the Align Login Page, enter Align username and password.

A screenshot of a login dialog box titled "B Wise Logon". It features two input fields: "User Name:" and "Password:". Below the fields are two buttons: "OK" and "Cancel". The dialog box is overlaid on a background image of a bridge structure.

Navigate to the TFE portlet through the My Align drop-down menu in the top left.



This will open the Create New TFE tab from which new TFEs can be created, as well as view draft TFEs or MCRs under the My Draft TFEs and MCRs view.

The screenshot displays the 'Technical Feasibility Exception' portlet. The top navigation bar includes a home icon, a dropdown menu, and the text 'Align For Entities'. Below the navigation bar is a tab bar with five tabs: 'Create New TFE' (highlighted with a red box), 'TFEs In Process', 'Approved TFEs', 'Inactive TFEs', and 'Disapproved TFEs'. The main content area is divided into two sections: 'MY REGISTRATIONS' and 'INSTRUCTIONS'. The 'MY REGISTRATIONS' section shows a table with one row: 'NCR00000 - Registered Entity in MRO' with a 'Create TFE' link. The 'INSTRUCTIONS' section contains a text block explaining the TFE process. Below this is the 'MY DRAFT TFEs AND MCRs' section, which is currently empty. The interface includes a home icon, a dropdown menu, and a pagination control showing 'Page 1 of 1'.

In addition to the Create New TFE tab, there are four other tabs of interest across the top:

- TFEs in Process
 - TFEs or MCRs that have been submitted to MRO for review.
- Approved TFEs
 - List of approved TFEs, and where MCRs, non-material changes, or Terminations will be initiated.
- Inactive TFEs
 - List of TFEs that were approved, but have reached their termination dates, or were manually terminated.
- Disapproved TFEs
 - List of disapproved TFEs.



CREATING NEW TFE

From the Create New TFE tab, select Create TFE next to the Registration detail section.

Technical Feasibility Exception

Align For Entities

Create New TFE

TFEs In Process

Approved TFEs

Inactive TFEs

Disapproved TFEs

MY REGISTRATIONS

REGISTRATION

NCR00000 - Registered Entity in MRO

APPLI... REQUIRE

Create TFE

Page 1 of 1

INSTRUCTIONS

This is the Registered Entity Technical Feasibility Exception (TFE) page. On the left, you can view your registrations and browse to a specific Requirement and Part to create a TFE. Below you can edit any draft TFEs or MCRs you have not yet submitted. To see the status of TFEs that have been submitted, review older submittals, update your TFE, or create a Material Change Report, go to the next tabs.

MY DRAFT TFES AND MCRS

TYPE

UNIQUE ID

REGISTRATION

STD REQ AND PART

PROPOSED TERMINATION DATE

This will open a popup from which the Requirement Part for the TFE will be selected.

SELECT REQUIREMENT AND PART

SELECT APPLICABLE REQUIREMENT AND PART

STD REQ AND PART

CREATE TFE

CIP-005-6 R1.4

+

CIP-005-6 R2.1

+

CIP-005-6 R2.2

+

CIP-005-6 R2.3

+

CIP-005-6 R2.4

+



If you click and highlight a Standard and Requirement from the list, a pop-out window will appear showing the Requirement language, as well as some additional detail that may be useful to reference.

SELECT REQUIREMENT AND PART

SELECT APPLICABLE REQUIREMENT AND PART

STD REQ AND PART	CREATE TFE
CIP-005-6 R2.2	+
CIP-005-6 R2.3	+
CIP-005-6 R2.4	+
CIP-005-6 R2.5	+
CIP-006-6 R1.3	+
CIP-007-6 R1.1	+
CIP-007-6 R4.3	+
CIP-007-6 R5.1	+

REQUIREMENT

Standard and Requirement

CIP-005-6 | R2.

Requirement Language

Each Responsible Entity shall implement one or more documented processes that collectively include the applicable requirement parts, where technically feasible, in CIP-005-6 Table R2 –Remote Access Management.

Time Horizon(s)

Operations Planning

Same-Day Operations

Violation Risk Factor (VRF)

Medium

Requirement Number

R2.

Measure

M2. Evidence must include the documented processes that collectively address each of the applicable requirement parts in CIP-005-6 Table R2 –Remote Access Management and additional evidence to demonstrate implementation as described in the Measures column of the table.

Requirement Applicability

BA

TOP

TO

To continue forward creating a TFE for the selected Requirement, click the plus icon:

SELECT REQUIREMENT AND PART

SELECT APPLICABLE REQUIREMENT AND PART

STD REQ AND PART	CREATE TFE
CIP-005-6 R2.2	+
CIP-005-6 R2.3	+
CIP-005-6 R2.4	+
CIP-005-6 R2.5	+
CIP-006-6 R1.3	+
CIP-007-6 R1.1	+
CIP-007-6 R4.3	+
CIP-007-6 R5.1	+

REQUIREMENT

Standard and Requirement

CIP-005-6 | R2.

Requirement Language

Each Responsible Entity shall implement one or more documented processes that collectively include the applicable requirement parts, where technically feasible, in CIP-005-6 Table R2 –Remote Access Management.

Time Horizon(s)

Operations Planning

Same-Day Operations

Violation Risk Factor (VRF)

Medium

Requirement Number

R2.

Measure

M2. Evidence must include the documented processes that collectively address each of the applicable requirement parts in CIP-005-6 Table R2 –Remote Access Management and additional evidence to demonstrate implementation as described in the Measures column of the table.

Requirement Applicability

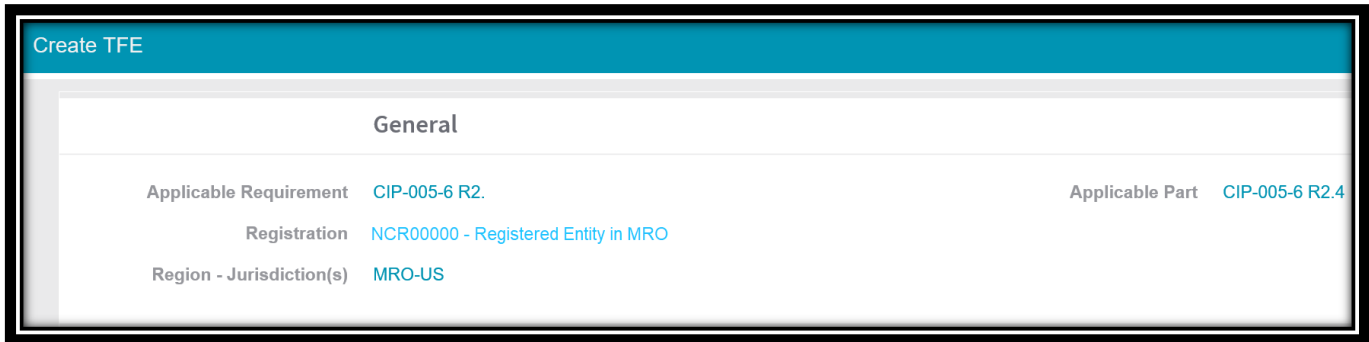
BA

TOP

TO



This will launch the Create TFE form, and in the General section, there will be information auto-populated. There is nothing to modify in this section, only verify that the information is accurate.



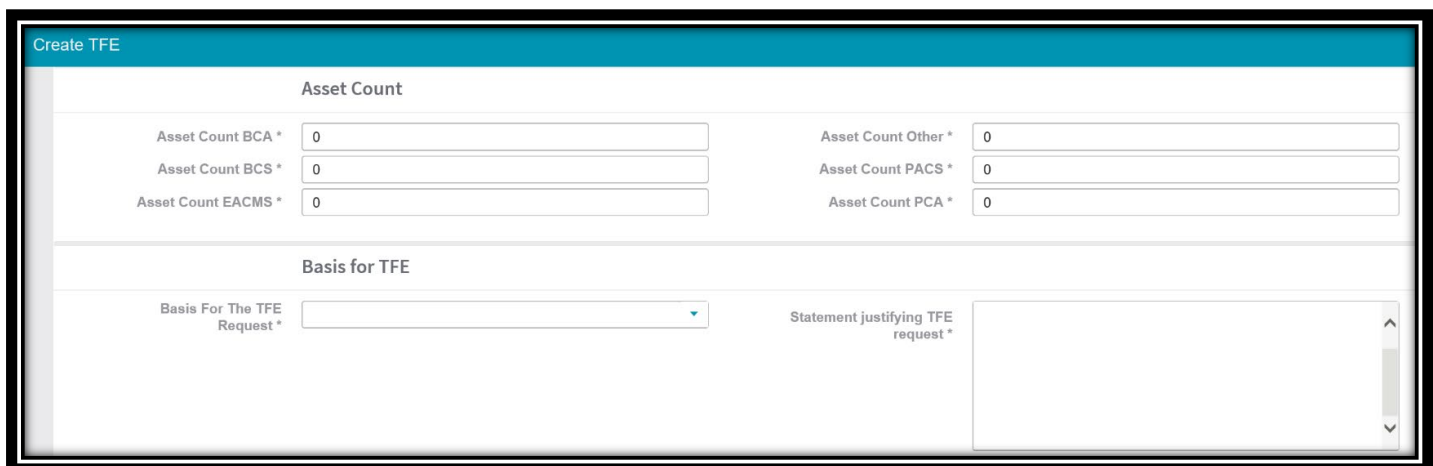
The screenshot shows the 'Create TFE' form with the 'General' section highlighted. The form contains the following information:

General	
Applicable Requirement	CIP-005-6 R2.
Registration	NCR00000 - Registered Entity in MRO
Region - Jurisdiction(s)	MRO-US
Applicable Part	CIP-005-6 R2.4

Continue scrolling down the Create TFE form, and the next sections will be Asset Count and Basis for TFE.

In the Asset Count section, document the type of assets being requested for the TFE, and how many of each device type. Eventually, additional detail about these assets will be provided, but because this is typically classified as sensitive information, this will be provided through the SEL.

In the Basis for TFE section, select an option from the dropdown to establish the basis for the TFE request, and then add a brief statement justifying the need for a TFE. Specific details about the basis can be provided through the SEL.



The screenshot shows the 'Create TFE' form with the 'Asset Count' and 'Basis for TFE' sections highlighted. The 'Asset Count' section contains the following information:

Asset Count	
Asset Count BCA *	0
Asset Count BCS *	0
Asset Count EACMS *	0
Asset Count Other *	0
Asset Count PACS *	0
Asset Count PCA *	0

The 'Basis for TFE' section contains the following information:

Basis for TFE	
Basis For The TFE Request *	Statement justifying TFE request *



The final section of the Create TFE form is for the Proposed Mitigation. Provide a brief summary of the mitigating and/or compensating measures for the issues underlying the TFE request, being careful to omit sensitive details. Specific details about the mitigating and/or compensating measures should be provided through the SEL.

The next dropdown asks if the mitigating and/or compensating measures have been fully implemented. If 'Yes', a prompt will appear to enter the actual completion date. If 'No', a prompt will appear to enter the proposed completion date.

The final dropdown asks if there is a planned time to terminate the TFE. If 'Yes', a prompt will appear to add the proposed termination date. If 'No', a prompt will appear to add a justification for why the TFE should be open-ended.

Create TFE

Proposed Mitigation

Provide a brief summary of compensating and/or mitigating measures that are planned or have been implemented *

Have the compensating and/or mitigating measures been fully implemented? *

Has a plan and a time schedule been proposed to terminate the TFE? *

FORM: RZ_TFE_01_Create

Update Close

Now that the Create TFE form has been completed, click the Update button, and navigate back to the Create New TFE landing page.

- TIP: If nothing appears to have happened after clicking the Update button, scroll back to the top of the TFE form, and there should be an error message indicating which mandatory field is missing information. When all mandatory fields are filled in appropriately, the update should go through successfully.



The newly created TFE will be shown under My Draft TFEs and MCRs view. If the TFE doesn't immediately show up, click the refresh button along the bottom. At this point, the TFE has not been submitted to MRO, and is still in a draft state.

- TIP: While the TFE is listed on the My Draft TFEs and MCRs view, if it is determined to be no longer needed prior to submission, or was drafted with incorrect information, such as Standard and Requirement Part, it can be deleted by checking the box for the appropriate TFE and selecting the trash can icon on the left side of the screen.

Technical Feasibility Exception

Align For Entities

Create New TFE TFEs In Process Approved TFEs Inactive TFEs Disapproved TFEs

MY REGISTRATIONS

REGISTRATION	APPLI... REQUIRE
NCR00000 - Registered Entity in MRO	Create TFE

Page 1 of 1

INSTRUCTIONS

This is the Registered Entity Technical Feasibility Exception (TFE) page. On the left, you can view your registrations and browse to a specific Requirement and Part to create a TFE. Below you can edit any draft TFEs or MCRs you have not yet submitted. To see the status of TFEs that have been submitted, review older submittals, update your TFE, or create a Material Change Report, go to the next tabs.

MY DRAFT TFEs AND MCRs

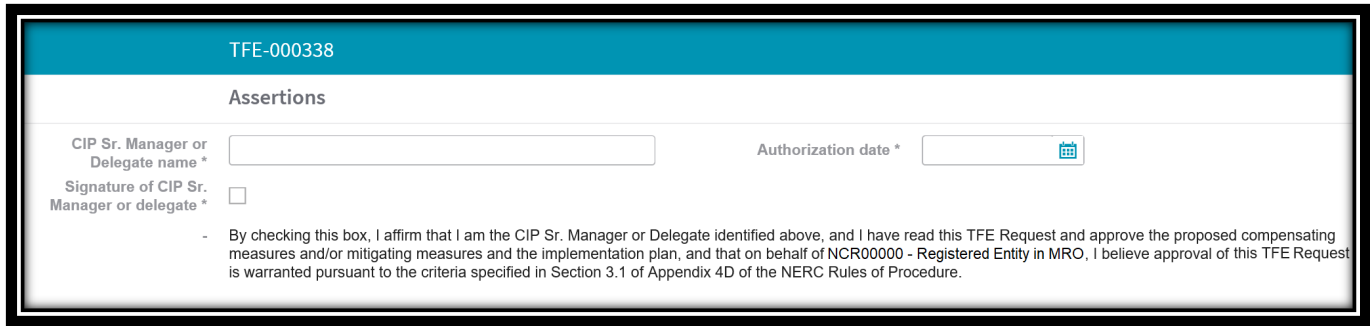
	TYPE	UNIQUE ID	REGISTRATION	STD REQ AND PART	PROPOSED TERMINATION DATE
<input type="checkbox"/>	TFE	XXXX-MRO-TFE-000338-0	NCR00000 - Registered Entity in MRO	CIP-005-6 R2.4	

Page 1 of 1



The next step is to approve and finalize the TFE for submission to MRO. A user at your entity with permission to approve this TFE will need to open up the draft, and review and finalize the information. Click on the Unique ID link to open and edit the TFE. There have been three new sections added to complete: Assertions, Evidence, and Action.

In the Assertions section, the CIP Sr. Manager or Delegate will enter their name, the date that they authorized the TFE, and then check the box, which serves as a proxy for their signature.



TFE-000338

Assertions

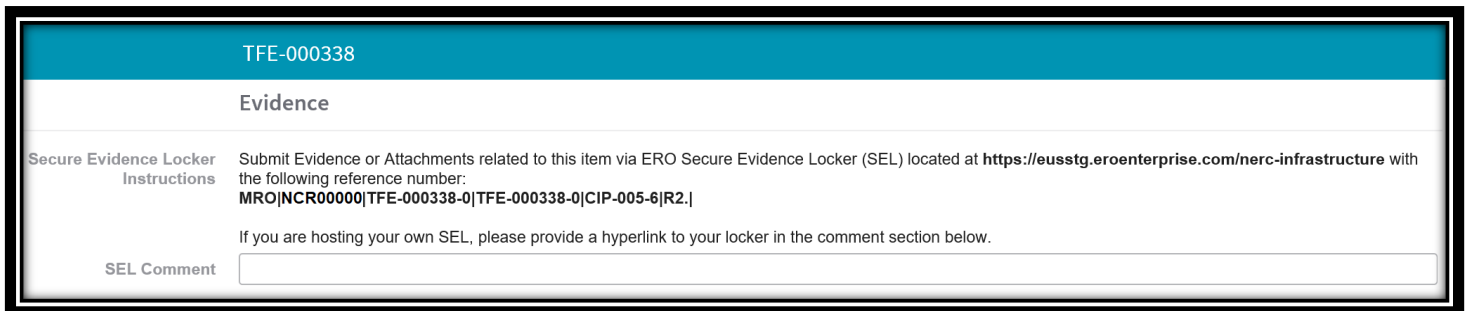
CIP Sr. Manager or Delegate name *

Authorization date *

Signature of CIP Sr. Manager or delegate * ☐

- By checking this box, I affirm that I am the CIP Sr. Manager or Delegate identified above, and I have read this TFE Request and approve the proposed compensating measures and/or mitigating measures and the implementation plan, and that on behalf of NCR00000 - Registered Entity in MRO, I believe approval of this TFE Request is warranted pursuant to the criteria specified in Section 3.1 of Appendix 4D of the NERC Rules of Procedure.

In the Evidence section, a URL and reference number is provided for uploading evidence and other documents to the SEL. See the [Secure Evidence Locker Asset Form](#) section within this document for instructions on obtaining, and filling out a template asset form which shall be used for providing additional details about the assets, and mitigating and/or compensating measures.



TFE-000338

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: MRO NCR00000 TFE-000338-0 TFE-000338-0 CIP-005-6 R2.
-------------------------------------	--

If you are hosting your own SEL, please provide a hyperlink to your locker in the comment section below.

SEL Comment



When the TFE is ready to be submitted to MRO, scroll down to the Action section. Like many other forms in Align, the Action field will dictate what Align does with the form once the Update button is clicked.

- Selecting CEA Review and then clicking Update will send the TFE to MRO for review.
- Selecting No Action and then clicking Update will save the form as a draft, and keep it in the My Draft TFEs and MCRs view.

TFE-000338

Action

Instructions Instructions, as RE it is possible to submit this TFE Request for CEA review, selecting the corresponding Action option below and click "Update".

Action CEA Review

Submission Comment*

Update Close

Once the TFE has been submitted to MRO for review, it will move to the TFEs in Process tab within Align. During this time, MRO may submit a Request for Information (RFI) if additional details are needed as part of the TFE review. RFIs show up in the home dashboard as well as being indicated by an email that informs a RFI for a specific TFE has been posted by MRO.

Technical Feasibility Exception							Align For Entities
Create New TFE TFEs In Process Approved TFEs Inactive TFEs Disapproved TFEs							
SUBMITTED TFES AND MCRS IN REGION PROCESSING						INSTRUCTIONS	
T...	UNIQUE ID	NCR	REGISTRATION	SUBMIT... DATE	REVIEW DUE DATE		
TFE	2021-MRO-TFE-000338-0	NCR00000	Registered Entity	06/24/2...	08/23/20...	TFEs and MCRs in the upper pane are currently being processed by the Region or LRE. You can access any related RFIs for this TFE by opening the TFE and scrolling to the bottom of the page.	
Page 1 of 1							

If MRO approves the TFE it will move to the Approved TFEs tab and likewise, if it is disapproved, it will move to the Disapproved TFEs tab.



MATERIAL CHANGE REPORTS

When there is a Material Change in the facts underlying approval of a TFE, such as an increase in assets, or changes to the mitigating and/or compensating measures, a Material Change Report (MCR) should be submitted.

Navigate to the Approved TFEs tab, which will show the current list of approved TFEs, and from where a MCR will be initiated.

The screenshot shows the 'Approved TFEs' tab selected in the 'Technical Feasibility Exception' system. The tab is highlighted with a red box. Below the tabs, there is a table titled 'APPROVED ACTIVE TFEs' with the following data:

UNIQUE ID	NCR	REGISTRATION	STD REQ AND PART	TFE END DATE	APPROVAL DATE
2021-MRO-TFE-000338-0	NCR00000	Registered Entity in MRO	CIP-005-6 R2.4		06/30/2021

Below the table, there is a pagination control showing 'Page 1 of 1'. At the bottom, there is an 'INSTRUCTIONS' section with the following text:

- Update it with non-material changes,
- Create a Material Change Report (MCR) for this TFE, or
- Terminate it.

Click on the Unique ID for the TFE that requires changes, and this will open the TFE window. Scroll down to the Action section at the bottom of the TFE. From the Action dropdown, select MCR, and click the Update button.

The screenshot shows the 'TFE-000338' window. The 'Action' section is highlighted. It contains the following instructions:

Instructions If you have made non-material changes, click Update to save those changes.

If you would like to Terminate this TFE, select the Terminate action and click Update.

If you would like to make a Material Change Report, select the MCR action and click Update. A MCR will be saved to your Draft TFEs and MCRs, located on the Create TFE tab.

At the bottom, there is an 'Action' dropdown menu with 'MCR' selected, and an 'Update' button.



A copy of the TFE will be created and shown on the Create New TFE tab under the My Draft TFEs and MCRs section.

Technical Feasibility Exception

Align For Entities

Create New TFE TFEs In Process Approved TFEs Inactive TFEs Disapproved TFEs

MY REGISTRATIONS

REGISTRATION APPLICABLE REQUIREMEN

NCR00000 - Registered Entity in MRO Create TFE

Page 1 of 1

INSTRUCTIONS

This is the Registered Entity Technical Feasibility Exception (TFE) page. On the left, you can view your registrations and browse to a specific Requirement and Part to create a TFE. Below you can edit any draft TFEs or MCRs you have not yet submitted. To see the status of TFEs that have been submitted, review older submittals, update your TFE, or create

MY DRAFT TFES AND MCRS

	TYPE	UNIQUE ID	REGISTRATION	STD REQ AND PART	PROPOSED TERMINATION
<input type="checkbox"/>	MCR	2021-MRO-TFE-000338-1	NCR00000 - Registered Entity in MRO	CIP-005-6 R2.4	

Click on the Unique ID link to open and edit the TFE. An updated detailed asset form will need to be provided via the SEL. See the [Secure Evidence Locker Asset Form](#) section within this document for instructions on obtaining, and filling out a template asset form which shall be used for providing additional details about the assets, and mitigating and/or compensating measures.

After making the necessary updates for the Material Change, scroll down to the Action section, and select CEA Review. Clicking the Update button will then send the MCR to MRO for review.

TFE-000338

Action

Instructions: Instructions, as RE it is possible to submit this TFE Request for CEA review, selecting the corresponding Action option below and click "Update".

Action: CEA Review

Submission Comment*

Update Close



Once the MCR has been submitted to MRO for review, it will move to the TFEs in Process tab within Align. During this time, MRO may submit a RFI if additional details are needed as part of the TFE review. RFIs show up in the home dashboard as well as being indicated by an email that informs a RFI for a specific TFE has been posted by MRO.

Technical Feasibility Exception							Align For Entities	
Create New TFE							TFEs In Process	
Approved TFEs							Inactive TFEs	
Disapproved TFEs								
SUBMITTED TFES AND MCRS IN REGION PROCESSING							INSTRUCTIONS	
	TYPE	UNIQUE ID	NCR	REGISTRATION	SUBMIT... DATE	REVIEW DUE DATE	TFEs and MCRs in the upper pane are currently being processed by the Region or LRE. You can access any related RFIs for this TFE by opening the TFE and scrolling to the bottom of the page.	
	MCR	2021-MRO-TFE-000338-1	NCR00000	Registered Entity	07/12/2...	09/10/2...		
Page 1 of 1								

If MRO approves the MCR it will move to the Approved TFEs tab and likewise, if it is disapproved, it will move to the Disapproved TFEs tab.



NON-MATERIAL CHANGES

Not every change to a TFE requires an MCR and/or MRO approval. In particular, reducing the number of assets covered by the TFE.

Navigate to the Approved TFEs tab, which will show the current list of approved TFEs, and from where the non-material changes will be initiated.

Technical Feasibility Exception

Align For Entities

Create New TFE TFEs In Process **Approved TFEs** Inactive TFEs Disapproved TFEs

APPROVED ACTIVE TFEs

UNIQUE ID	NCR	REGISTRATION	STD REQ AND PART	TFE END DATE	APPROVAL DATE
2021-MRO-TFE-000338-0	NCR00000	Registered Entity in MRO	CIP-005-6 R2.4		06/30/2021

Page 1 of 1

INSTRUCTIONS

- Update it with non-material changes,
- Create a Material Change Report (MCR) for this TFE, or
- Terminate it.

Click on the Unique ID for the TFE that requires changes, and this will open the TFE window. Scroll down to the Asset Count section and click the checkbox to confirm that the changes are non-material changes, and that new assets aren't being added that have not yet been approved. Once the box is checked, asset counts can be reduced.

Asset Count

Confirm that this is not a material change ☒

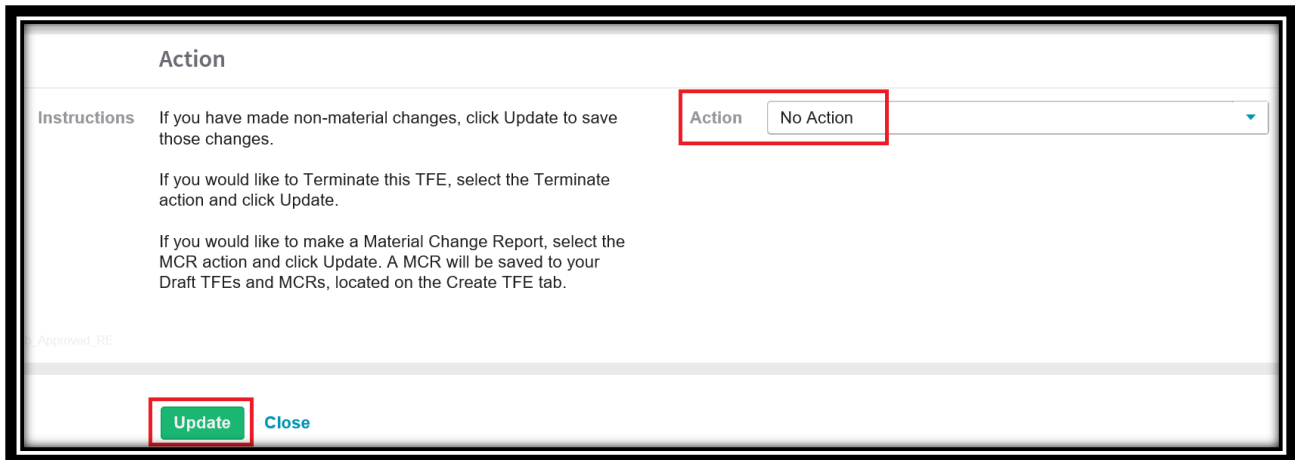
- Check the box above if you would like to update this TFE with a non-material change.

Asset Count BCA	5	Asset Count BCA Lowered	4
Asset Count BCS	4	Asset Count BCS Lowered	
Asset Count EACMS	5	Asset Count EACMS Lowered	4
Asset Count Other	0	Asset Count Other Lowered	
Asset Count PACS	2	Asset Count PACS Lowered	
Asset Count PCA	4	Asset Count PCA Lowered	



Even though a non-material change does not require MRO to review and approve it, an updated detailed asset form will still need to be provided via the SEL. See the [Secure Evidence Locker Asset Form](#) section within this document for instructions on obtaining, and filling out a template asset form which can be used for providing additional details about the assets, and mitigating and/or compensating measures.

After lowering the asset counts for the affected device types, scroll down to the Action section, choose No Action, and click Update. Even though No Action was selected, this will save the lowered asset counts. An important point to note is that once the asset counts have been reduced through a non-material change, they cannot be increased back to the original numbers without issuing a MCR.



Action

Instructions If you have made non-material changes, click Update to save those changes.

If you would like to Terminate this TFE, select the Terminate action and click Update.

If you would like to make a Material Change Report, select the MCR action and click Update. A MCR will be saved to your Draft TFEs and MCRs, located on the Create TFE tab.

Approved RE

Action **No Action**

Update **Close**

Clicking the Update button will run a validation, so if the asset counts are accidentally increased, an error message will appear. One additional item to note, a non-material change will not send notification to MRO for review.



TERMINATE TFE

When a TFE is determined to no longer be necessary, it can be terminated.

Navigate to the Approved TFEs tab, which will show the current list of approved TFEs, and from where the termination will be initiated.

Technical Feasibility Exception

Align For Entities

Create New TFE TFEs In Process **Approved TFEs** Inactive TFEs Disapproved TFEs

APPROVED ACTIVE TFEs

UNIQUE ID	NCR	REGISTRATION	STD REQ AND PART	TFE END DATE	APPROVAL DATE
2021-MRO-TFE-000338-0	NCR00000	Registered Entity in MRO	CIP-005-6 R2.4		06/30/2021

Page 1 of 1

INSTRUCTIONS

- Update it with non-material changes,
- Create a Material Change Report (MCR) for this TFE, or
- Terminate it.

Click on the Unique ID for the TFE that needs to be terminated, and this will open the TFE window. Scroll down to the Action section, choose Terminate, and click Update.

Action

Instructions

If you have made non-material changes, click Update to save those changes.

If you would like to Terminate this TFE, select the Terminate action and click Update.

If you would like to make a Material Change Report, select the MCR action and click Update. A MCR will be saved to your Draft TFEs and MCRs, located on the Create TFE tab.

Approved RE

Update Close

Action Terminate

There is no validation or review, and the terminated TFE will now show up on the Inactive TFEs tab. Once a TFE has been terminated, it can no longer be modified.



SECURE EVIDENCE LOCKER ASSET FORM

Download the [TFE - Asset Import SEL Template](#) spreadsheet from the [MRO website](#). This spreadsheet will support providing sensitive details about the assets and mitigating and/or compensating measures. The information being requested in the spreadsheet is required, and an updated spreadsheet should be provided for any new TFE, MCR, or non-material change. Once the spreadsheet has been filled in appropriately, it should be uploaded to the SEL following instructions listed in the Evidence section of the TFE within Align.

The TFE asset spreadsheet submitted to the SEL should be saved and maintained by the registered entity. During engagements (i.e., audits) the information may be requested again for review due to SEL retention timeframes.

