NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Align & ERO Secure Evidence Locker Project Update

Stan Hoptroff, Vice President, Business Technology
MRO Board Meeting Update
June 25, 2020

RELIABILITY | RESILIENCE | SECURITY

Agenda

- Major/New Topics
  - Align Benefits
  - Expected Align Functionality R1-R3
  - Updated Timeline and Upcoming Activities
  - Registered Entity Testing
  - Governance Model
  - How to stay informed
  - ERO – Secure Evidence Locker (ERO-SEL)

Align - Benefits

Moving to a common platform will provide:

- Alignment of **common** Compliance Monitoring & Enforcement Program (CMEP) **business processes**, ensuring consistent practices and data gathering
- A **standardized interface** for registered entities to interact with the ERO Enterprise
- **Real-time access to information**, eliminating delays and manual communications
- **Consistent application** of the CMEP
- **More secure** method of managing and storing CMEP data

Align Release 1: What to expect as a registered entity?

Stakeholder Group

Registered Entities

Release 1 Functionality

- Create and submit Self-Reports and Self-Logs
- Create and manage mitigating activities (informal) and Mitigation Plans (formal)
- View and track Open Enforcement Actions (EAs) resulting from all monitoring methods
- Receive and respond to Requests for Information (RFIs)
- Receive notifications and view dashboards on new/open action items
- Generate report of Standards and Requirements applicable to your entity
- Manage user access for your specific entity

Align Release 1: What to expect as a Regional Entity?

Stakeholder Group

Regional Entities

Release 1 Functionality

- Receive Self-Reports and Self-Logs from entities
- Manually create findings that result from any monitoring method (Audits, Spot Checks, Investigations, Periodic Data Submittals (PDSs), Self-Certifications, Complaints)
- Perform Preliminary Screens, Potential Noncompliance Reviews, and disposition determinations for each PNC/EA
- Send and received responses to RFIs
- Trigger notifications such as Notice of Alleged Violation(s) and Proposed Penalty or Sanction, Notices of Confirmed Violation(s), Compliance Exception Letter(s), Find, Fix, Track & Report Letter(s), and Settlement Agreements
- Receive, review, and approve mitigating activities (informal) and Mitigation Plans (formal)
- Receive notifications and view dashboards on new/open action items
- Generate report of Standards and Requirements applicable to a registered entity

Align Future Releases: What to expect?

Release 2 Functionality Est. 2021

- Technical Feasibility Exceptions
- Self-Certifications
- PDSs

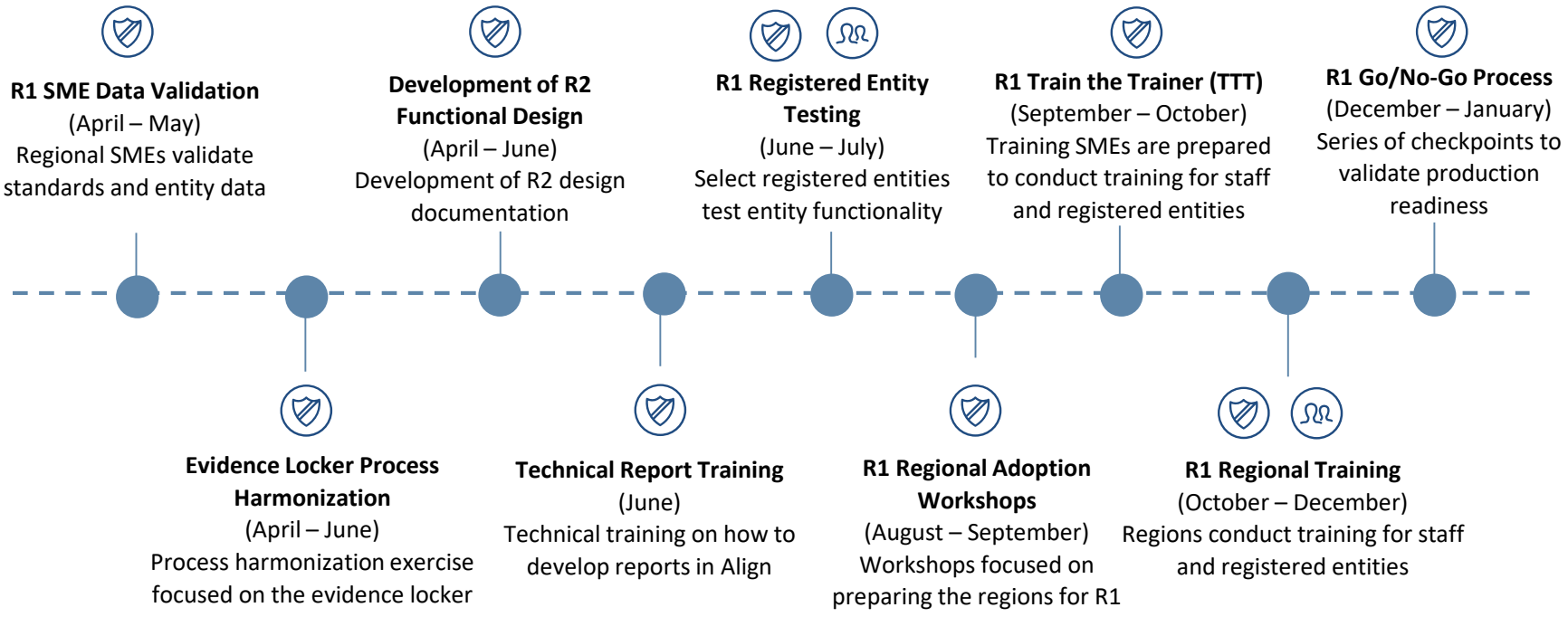
Note: A strategy is being developed for how these monitoring methods will be managed in the gap between Releases

Release 3 Functionality Est. 2021

- Compliance Planning (Risk, CMEP Implementation Plan, Inherent Risk Assessment, Internal Controls Evaluation, Compliance Oversight Plan)
- Compliance Audit
- Spot Check
- Compliance Investigations
- Complaints

Timeline Overview

The following is a timeline of upcoming key activities:



AUDIENCE IMPACT KEY

Registered Entities

ERO Enterprise Staff

Entity Testing Schedule and Participants

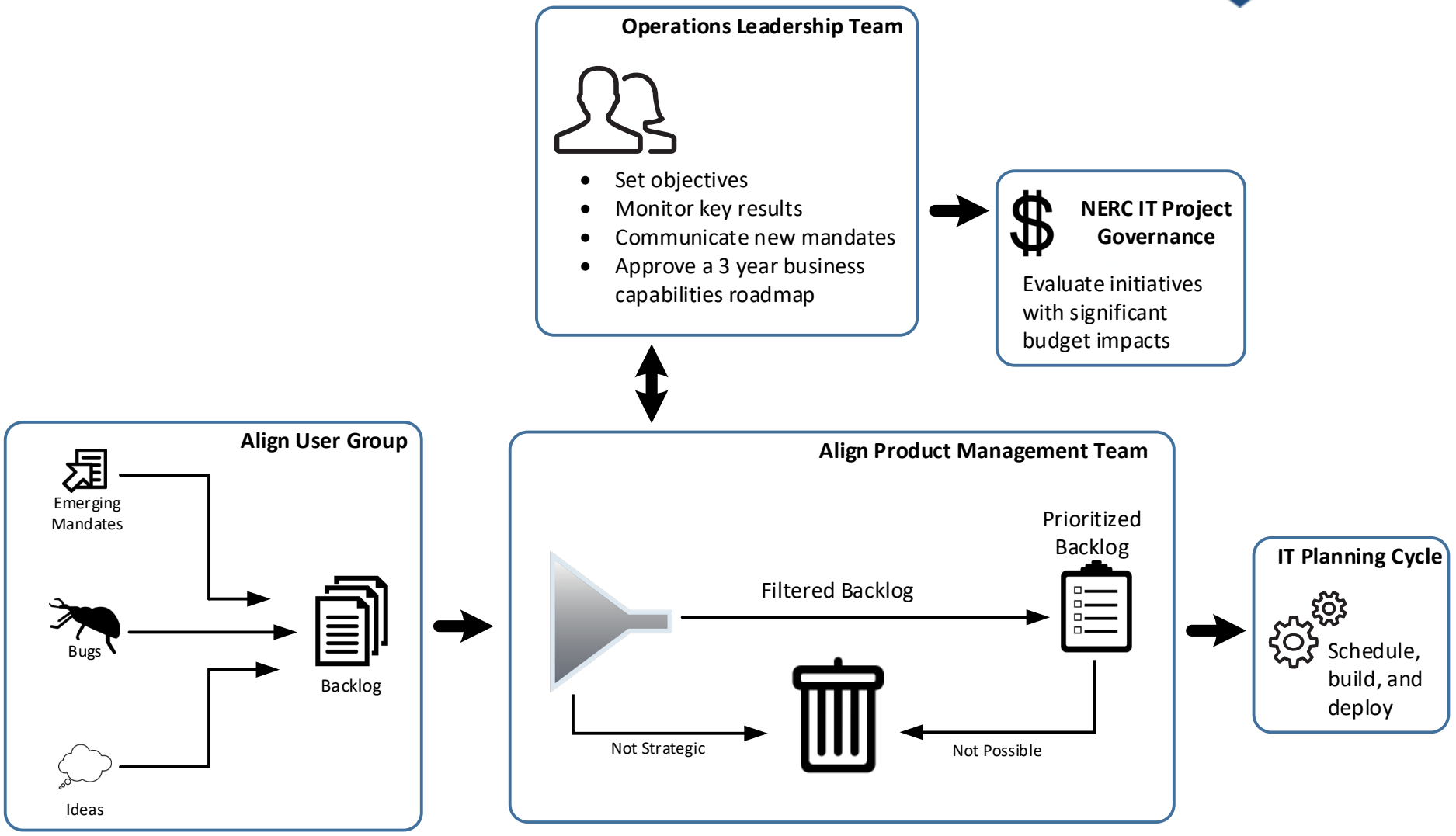
Session	Date & Time
Kickoff and Logistics	June 18 (1 – 2 PM ET)
MRO Testing	July 7 (1 – 4:30 PM ET)
WECC Testing	July 8 (10:30 – 2 PM ET)
TRE Testing	July 13 (2 – 5:30 PM ET)
NPCC Testing	July 14 (8:30 – 12 PM ET)
RF Testing	July 15 (1 – 4:30 PM ET)
SERC Testing	July 22 (1 – 4:30 PM ET)

Tester/Representative	Company	Region
Jennifer Flandermeyer	Evergy	MRO
Tiffany Lake	Evergy	MRO
Mandy Barta	Evergy	MRO
Omar Elabbady	Xcel Energy	MRO
Thad Ness	Xcel Energy	MRO
Ashley Stringer	Oklahoma Municipal Power Authority	MRO
Tammy Porter	Oncor	TRE
Martha Henson	Oncor	TRE
Lee Maurer	Oncor	TRE
Amelia Anderson	CenterPoint	TRE
Daniela Hammons	CenterPoint	TRE
Venona Greaff	OXY	TRE
Kimberly Tolbert	OXY	TRE

Tester/Representative	Company	Region
Betty Day	ERCOT	TRE
Christine Hasha	ERCOT	TRE
Collen Frosch	ERCOT	TRE
Lisa Milanes	CAISO	WECC
Marty Hostler	NCPA	WECC
Scott Tomashefsky	NCPA	WECC
Catalina Hansen	SoCalEdison	WECC
HeCareth Wosu	SoCalEdison	WECC
John Pespisa	*SoCalEdison*	*WECC*
Kelley Stevens	SoCalEdison	WECC
Matt Goldberg	ISO-NE	NPCC
Greg Campoli	NYISO	NPCC
Patti Metro	NRECA	SERC?
Mark Pratt	Southern Co	SERC
Brandon Cain	Southern Co	SERC
Marsha Morgan	Southern Co	SERC
Roy O'Neal Kiser Jr	Southern Co	SERC
Silvia Parada Mitchell	FPL	SERC
Carol Chinn / Truong Le (covering for Carol)	FMPA	SERC
Jennifer Sterling	Exelon	RF
Kinte Whitehead	Exelon	RF
Rajesh Varghese	Exelon	RF
Rachel Snead	Dominion	RF

Proposed Governance Model For Future Enhancements

Interaction Model



Align User Community Input

Responsibility

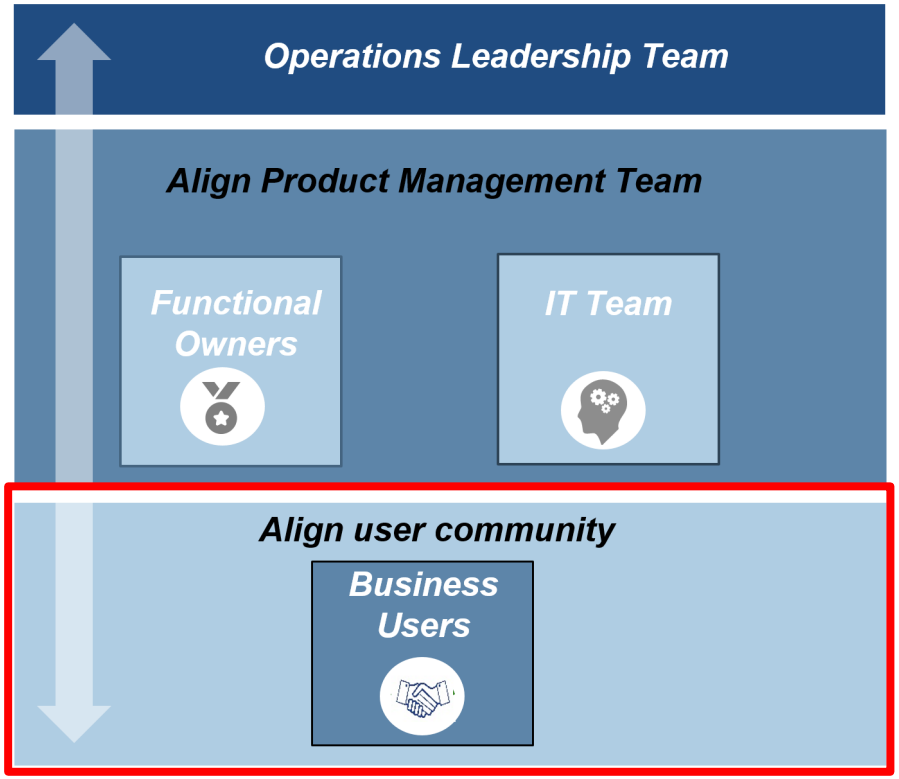
- Provide feedback on the needs and opportunities to improve Align
- Support and promote consistent use of Align among Regional users
- Serve as focal point to collect business needs

Participants

- Two Align users from each Region (for a total of 12 at any one time)
- NERC Align Functional Administrator and Align Business Engagement Analyst
- **Representation from CCC-AWG**

Proposed Activities

- Monthly meetings
- Collaborate and refine enhancement requests



How To Stay Informed

Key communication vehicles

- Align newsletter for Regions and registered entities
- Regional Change Agent Network
- Dedicated project page on NERC.com: Click Here
- Upcoming CMEP Regional workshops
- Trades meetings, as appropriate

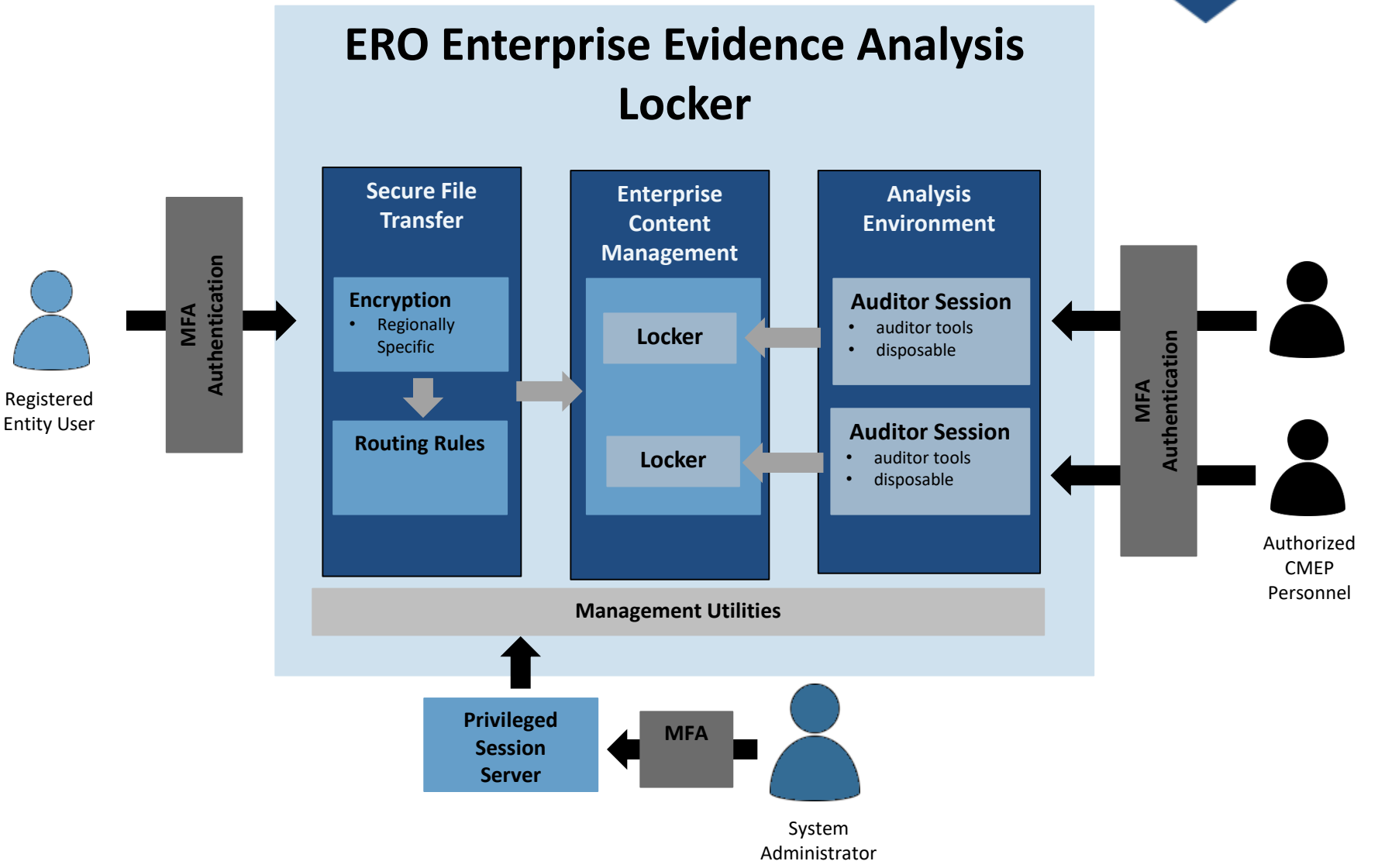
Evidence Collection Problem Statement

- Issues Discovered:
  - Inconsistent processes for requesting, handling and storage of evidence
  - Critical data protection requires additional capabilities beyond our current systems
  - Critical data protection is, and will remain, a CEO-level concern for our industry, hence the “gold standard” expectation
- Recommended Solution:
  - Provides content separation in connection with CMEP activities
  - Create a highly secure ERO Enterprise evidence locker
  - Harmonize processes for evidence collection processes
  - Enhance ERO Enterprise work products to reduce risk of a critical data exposure
  - Conduct independent review prior to launch and prior to new releases

What is the ERO SEL?

- A highly secure, isolated environment
  - Purpose-built to collect and protect evidence
  - Enables submission by authorized and authenticated entity users
  - Provides compartmentalized analysis of evidence in temporary, isolated, disposable environments
  - No interfaces with any other systems
- Evidence
  - Is encrypted immediately upon submission
  - Is securely isolated per entity
  - Is never extracted
  - Is never backed up
  - Is subject to proactive and disciplined destruction policies

ERO SEL - How will it work? Technical Implementation



ERO SEL Project Justification

- Significantly reduces risk for evidence loss and exposure
- Solution design informed by stakeholder input
- Allows content segregation to significantly enhance security
- Highest commercially available design to conform to National Institute of Standards and Technology 800.171 standard (“the gold standard”)

Questions and Answers