



RELIABILITY FIRST

ALIGN

ALIGN



Registered Entity Align Training

May 2021

Cleveland, OH



Anti-Trust Statement

- It is ReliabilityFirst's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct which violates, or which might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.
- It is the responsibility of every ReliabilityFirst participant and employee who may in any way affect ReliabilityFirst's compliance with the antitrust laws to carry out this policy.



SESSION AGENDA & LOGISTICS

ALIGN



Session Agenda

- **Align Access and User Roles**
- **Align System – Release 1 Orientation and Functionality**
- **ERO Secure Evidence Locker (SEL) Access and Functionality**



Session Presenters

➤ **Ray Sefchik – Director, Entity Engagement**



➤ **Bob Folt – Principal Analyst**



➤ **Patrick O'Connor – Senior Counsel**

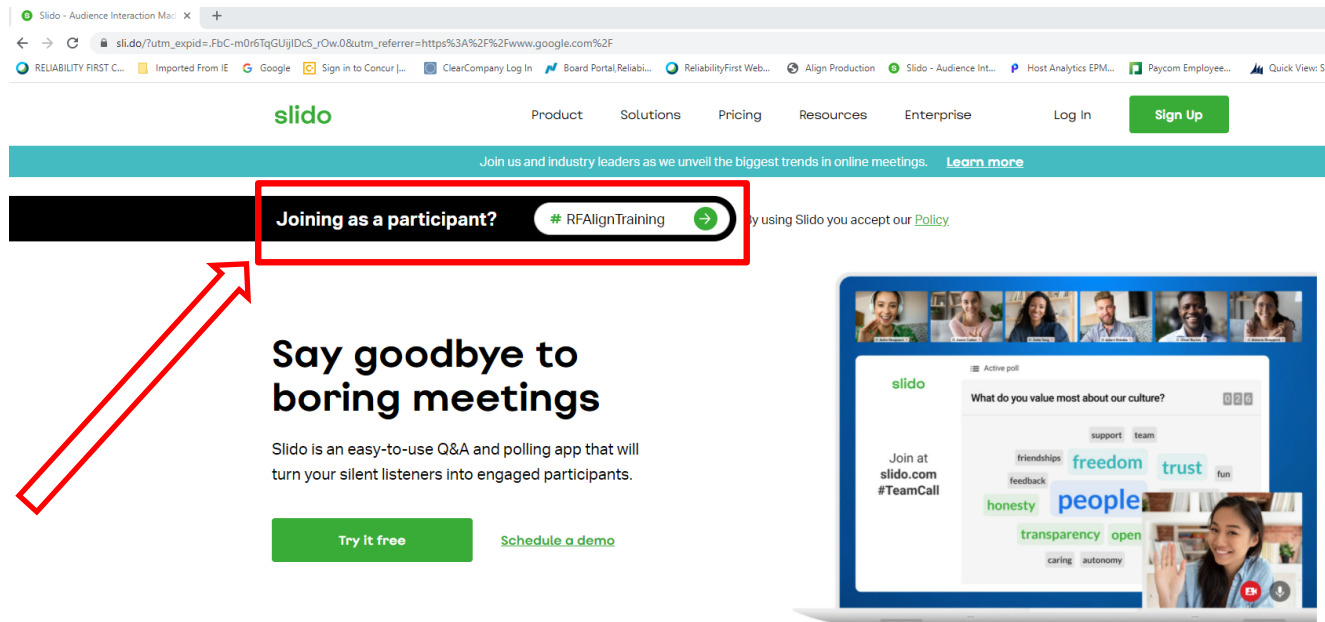


➤ **Ron Ross – Principal Reliability Consultant**



Session Interaction

- Submittal of Questions and Audience Polling handled via Slido
- All feedback is anonymous, but we will show the aggregate group feedback in real-time
- Login to **Slido.com** use the event code - **#RFAlignTraining**
- Optionally, via mobile device and scan the QR Code below



Or Scan
QR Code



You can use Slido with



What is Align?

- **Align** is a system which moves all ERO compliance monitoring and enforcement business processes to a common standardized platform, resulting in a consistent application of the ERO Enterprise CMEP and a more secure method of managing and storing CMEP evidence and data

The objectives and benefits of the Align Project are:

- Single, common portal for registered entities, enabling consistency of experience
- Real-time access to information, eliminating delays and manual communications
- Improved capability to support the Risk-Based Compliance Oversight Framework
- Enhanced quality assurance and oversight, enabling consistent application of the CMEP
- Improved analytics, including visibility into compliance and reliability risks
- Increased capability to implement audit best practices and processes (planning, fieldwork, reporting, quality assurance)
- Standardization and implementation of common business processes and workflows, enabling increased productivity



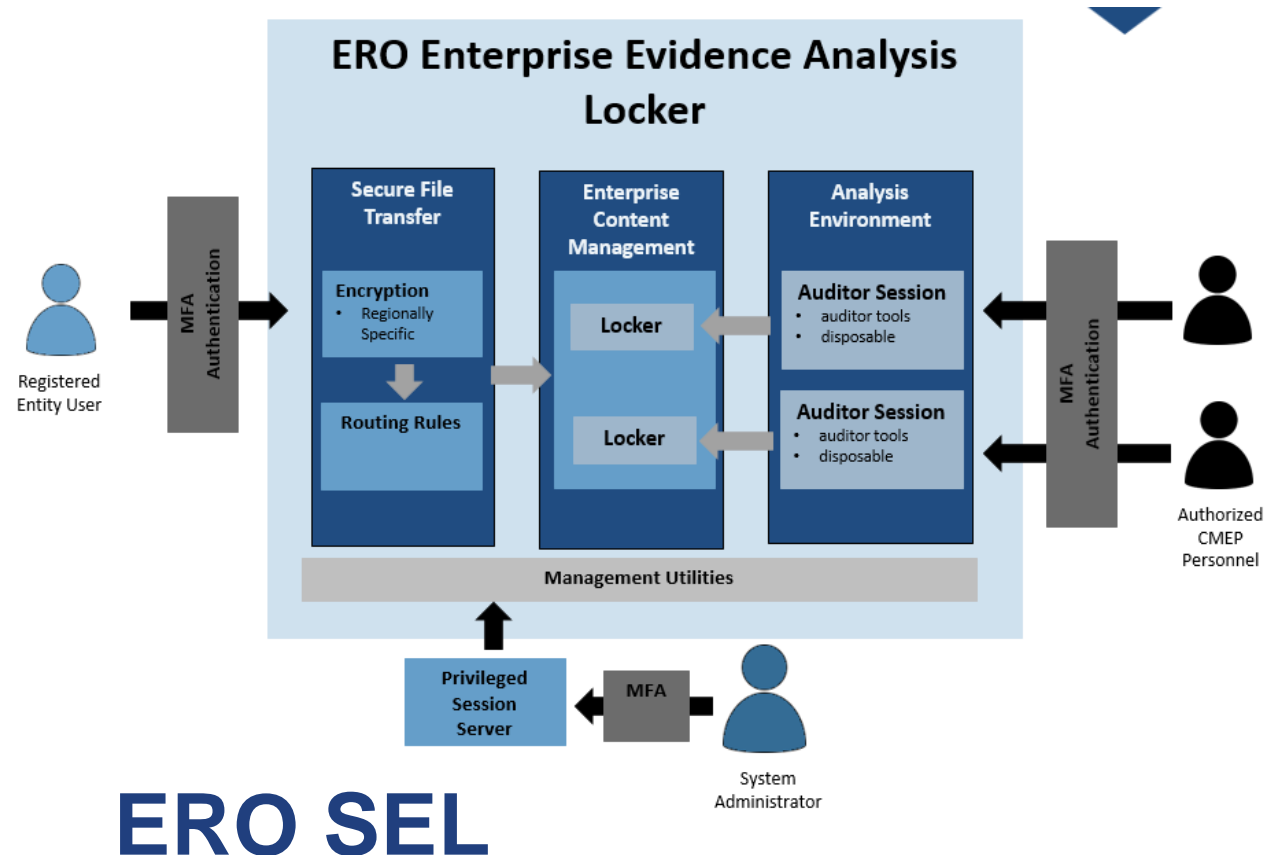
What is the ERO Secure Evidence Locker (SEL)

➤ Highly secure, isolated, on-premises environments

- Collect and protect evidence
- Enable submission by authorized and authenticated entity users
- Provide compartmentalized analysis of evidence in temporary, isolated, disposable environments
- Does not interface with any other systems

➤ Evidence in these environments is:

- Encrypted immediately upon submission
- Securely isolated per entity
- Never extracted
- Never backed up
- Subject to proactive and disciplined destruction policy



Align Release 1 – What to expect?

Stakeholder Group

Registered Entities



Release 1 Functionality

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



Align Releases 2 and 3 – What to Expect?

Release 2 Functionality Q2 2021

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

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

Release 3 Functionality Q4 2021

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



ALIGN ACCESS AND USER ROLES

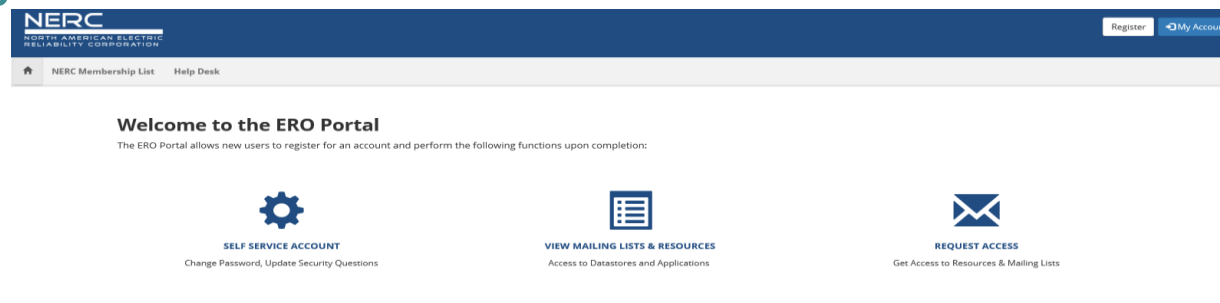
ERO PORTAL ACCOUNT ACCESS
ADMINISTRATION OF REGISTERED ENTITY USERS
ALIGN SYSTEM ACCESS
ALIGN SUPPORT

The logo for ALIGN, featuring the word "ALIGN" in a bold, blue, sans-serif font. The letter "A" is stylized with a diagonal line through it, and the "I" is a simple vertical bar.

ERO Portal Access

Access requires an ERO Portal Account

- Set-up ERO Portal Account:
 - ✓ Navigate to <https://eroportal.nerc.net>
 - ✓ Select “Register” in upper right-hand corner
 - ✓ Complete the registration form and click “Submit”
- Verify ERO Portal Account:
 - ✓ Navigate to <https://eroportal.nerc.net>
 - ✓ Select “Sign In” in the upper left hand corner
 - ✓ Enter your credentials to confirm access to ERO Portal

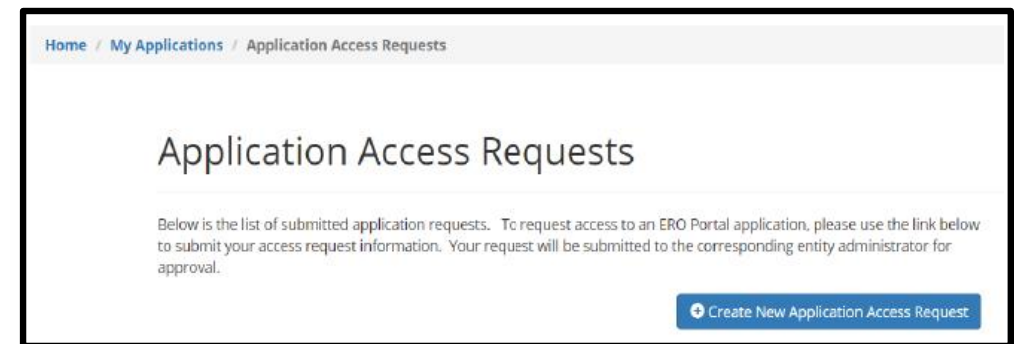
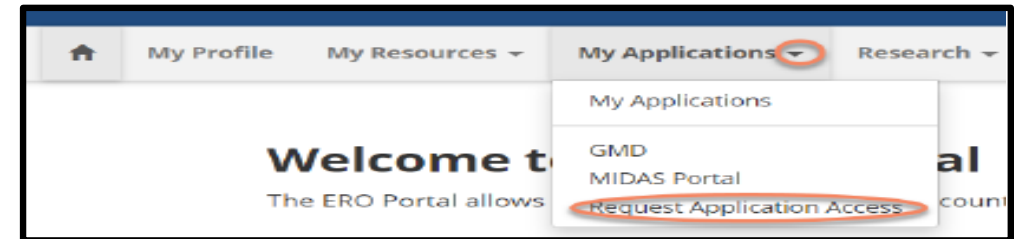


Access to Align

Access to Align

- All Align users MUST have an ERO Portal Account
 - ✓ ERO Portal Registration (pgs. 4-8,15-18)
 - ✓ Multi-Factor Authentication set-up required for ERO Portal Account (pgs. 9-14)
 - ✓ ERO Portal login process (pgs. 19-24)
 - ✓ Requesting access to Align (pgs. 25-31)
 - ✓ Approving access Requests (pgs. 32-34)
 - ✓ <https://nerc.bwise.net/>
 - ✓ ERO Portal/My Applications tab/Align

Reference – [Registered Entity User Access Guide](#)



Align Account Access

➤ **Account Access Levels** (page 28)

- **Align Registered Entity Reader**

Reader can log into Align and see everything for their registered entity, but cannot make changes.

- **Align Registered Entity Editor**

Editor can log into Align, see everything for their registered entity and make changes, but cannot submit anything to the CEA for review or processing.

- **Align Registered Entity Submitter**

Submitter can log into Align, see everything for their registered entity, make changes, and submit items to the CEA for review or processing.

- PCCs will have Align Submitter Role at Go-Live.

Reference – [Registered Entity User Access Guide](#)



Align Account Access

➤ PCC Approves/rejects access for their entity user request for Align in the ERO Portal

PCC
Align Registered Entity
Submitter and Entity Administrator

Align Registered Entity
Reader

Align Registered Entity
Editor

Align Registered Entity
Submitter

Application Access Requests

The following are the current application access requests for your registered entity. To approve or reject a request, select "Manage Access Request" from the item menu. When rejecting an access request, you must provide a reason for denying a request. You can also view and manage all users for your entity on the Manage Entity Page.

Requested By	Email Address	Phone	Requested Application Role	Requester Comments	Request Status	Created On
victor.LT.nyenssssss	victornyers1906@gmail.com	404-555-1212	CFR Administrator	kgj	Pending	6/24/2020 5:42 PM
Kwame Jones	kwame.jones@nrc.net	4044462570	Entity Admin	Testing Entity Admin Request	Pending	5/27/2020 1:04 PM
Rachel Reader	rachel.reader@nrc.net	404-852-3981	GMO Submitter	CAN I HAVE ACCESS PLEASE	Pending	4/29/2020 12:42 PM

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Reference – [Registered Entity User Access Guide](#)



Setting up PCC Accounts for Align

- Prior to go-live, all PCCs with ERO Portal Accounts will be assigned the **Align Registered Entity Submitter**, **SEL Submitter** and **Entity Administrator** roles and this person will be responsible for approving Align access requests



Requesting Align Account Access

- Requesting Access (pgs. 25-31)
- From ERO Portal (<https://eroportal.nerc.net>), navigate to “My Applications” and select “Request Application Access” from the dropdown menu
- Select “Create New Application Access Request”
- Complete appropriate information for request and submit

The screenshot shows the NERC ERO Portal interface. The top navigation bar includes 'My Profile', 'My Resources', 'My Applications', 'Research', 'My Groups', 'Entity Registration Requests', 'My Entity', 'NERC Membership List', 'NERC Membership', and 'Help Desk'. The main content area is titled 'Application Access Requests' and contains a table with columns: NERC Number (Entity), Entity, Requested Application Role, Request Status, Approved By, Rejected By, Created On, and Modified On. A blue button labeled 'Create New Application Access Request' is circled in red.

The screenshot shows the 'Request Application Access' form. It includes a table of available applications and roles, and a form to submit a request. The 'Requested Application Role' dropdown menu is open, showing a list of roles.

Application	Role	Role Description
All Applications	Entity Administrator	This person has read and write access to Align data, GMD data, MIDAS data, and CORES data. In addition this person can make others the Entity Administrator and give others access to Align, GMD, MIDAS and CORES or remove access to those system from others.
ALIGN	Align Registered Entity Editor	This person can create and edit items in Align for the Entity he/she is associated with, as well as submit evidence to the SEL.
ALIGN	Align Registered Entity Reader	This person can view items in Align for the Entity he/she is associated with, as well as submit evidence to the SEL.
ALIGN	Align Registered Entity Submitter	This person can create/edit and submit items in Align for the Entity he/she is associated with, as well as submit evidence to the SEL.
CORES	CORES User	This person can create/edit registration information (including CFRs/JROs) and run registration reports for the entity he/she is associated with.
GMD	GMD User	This person can view and submit GMD data and run GMD reports for the entity he/she is associated with.
GMD	GMD Read-Only	This person can view GMD data and run GMD reports for the entity he/she is associated with.
MIDAS Portal	MIDAS User	This person can create/edit and submit MIDAS data and run MIDAS reports for the entity he/she is associated with.
MIDAS Portal	MIDAS Read-Only	This person can view MIDAS data and run MIDAS reports for the entity he/she is associated with.

Entity *

Requested Application Role *

Requester Comments

Requested Application Role *

- Align Registered Entity Editor
- Align Registered Entity Reader
- Align Registered Entity Submitter
- CORES User
- Entity Admin
- GMD Read-Only
- GMD User
- MIDAS Read-Only
- MIDAS User

Reference – [Registered Entity User Access Guide](#)



Approving Align Account Access

- Approving Access (pgs. 32-34)
- As Entity Administrator from ERO Portal (<https://eroportal.nerc.net>) navigate to NEW Notifications or “Entity Application Access requests”
- Select dropdown arrow next to desired request and “Approve or Reject”

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

New Notifications

Victor Myers

NTDSSSSS - Test Company 2-1

3 Pending Application Access Requests

My Profile My Resources My Applications Research My Groups Entity Registration Requests **My Entity** NERC Membership List

Welcome to the ERO Portal

The ERO Portal allows new users to register for an account and perform the following functions upon com

- My Entity
- Manage Entity Users
- CORES
- Entity Application Access Requests**
- Section 1600 Reporting Confirmation

Application Access Requests

The following are the current application access requests for your registered entity. To approve or reject a request, select "Manage Access Request" from the item menu. When rejecting an access request, you must provide a reason for denying a request.

You can also view and manage all users for your entity on the [Manage Entity Page](#).

Requested By	Email Address	Phone	Requested Application Role	Requester Comments	Request Status	Created On	
victor LT myersssssss	victormyers1906@gmail.com	404-555-1212	CFR Administrator	kjjj	Pending	6/24/2020 5:42 PM	▼
Kwame Jones	kwame.jones@nerc.net	4044462570	Entity Admin	Testing Entity Admin Request	Pending	5/27/2020 1:04 PM	▼
Rachel Rieder	rachel.rieder@nerc.net	404-852-3981	GMD Submitter	CAN I HAVE ACCESS PLEASE	Pending	4/29/2020 12:42 PM	▼

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Approve Request

Reject Request



Entity Application Access Request Management

➤ Open Requests from “My Entity” Tab

Application Access Requests

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Menu

- [Approved Application Access Requests](#)
View previously approved application access requests
- [Rejected Application Access Requests](#)
View previously rejected application access requests

➤ Approve/Reject requests

Application Access Requests

The following are the current application access requests for your registered entity. To approve or reject a request, select "Manage Access Request" from the item menu. When rejecting an access request, you must provide a reason for denying a request.

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Approve Request
Reject Request



User Management in ERO Portal

➤ Manage Entities in ERO Portal

Manage Entity Users

Entity Name
Testing Company Name Update, LLC

Entity Users

The following users are associated with this entity:

User	City	State	Phone	E-mail Address	Action
Abby Fellingner	Austin	TX		abby.fellingner@texasre.org	Remove User
AJ Smullen	Austin			aj.smullen@texasre.org	Remove User
Anthony Aguilar	Atlanta			anthony.aguilar@nerc.net	Remove User
Aviance Clay	Atlanta	GA		Aviance.Clay@nerc.net	Remove User
Brennan Coheleach	Cobb			brennan.coheleach@nerc.net	Remove User
Chris Boyd-Witherspoon	Atlanta	GA		Chris.Boyd-Witherspoon@nerc.net	Remove User
Christopher Scheetz	Atlanta	GA		chris.scheetz@nerc.net	Remove User
Dan Nagar	Atlanta			Dan.Nagar@nerc.net	Remove User
Dana Klem	St. Paul			dana.klem@mro.net	Remove User
Deployment Manager	Atlanta			deployment.manager@mailinator.com	Remove User
Donna Pratt	Atlanta	GA		donna.pratt@nerc.net	Remove User

Application Access Requests

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Manage Entity Users / User Permissions

User Permissions

Manage User Permissions for: Renata Fellmeth

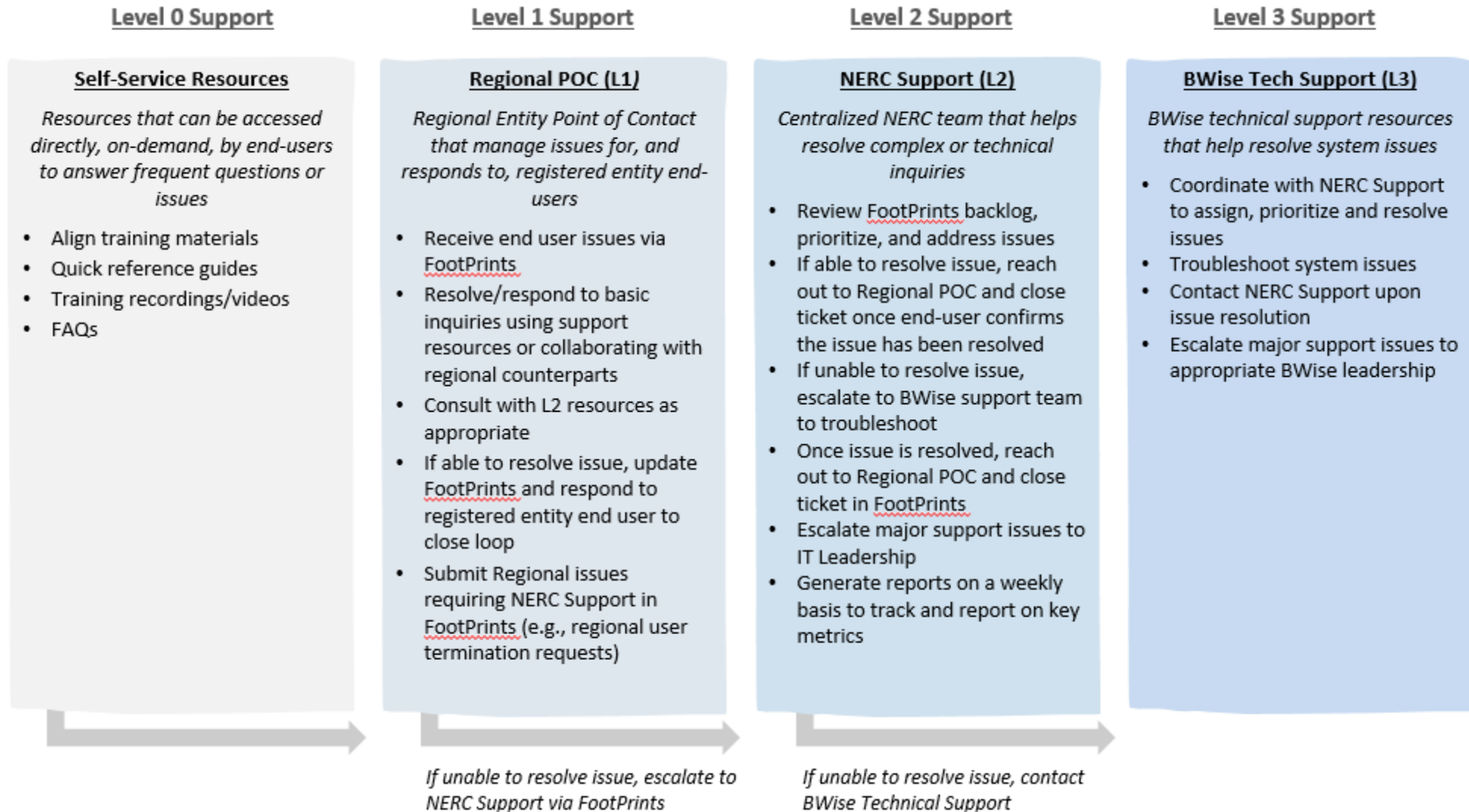
- CORES User
- GMD User
- GMD Read-Only
- MIDAS User
- MIDAS Read-Only
- Entity Admin
- Align Registered Entity Editor
- Align Registered Entity Reader
- Align Registered Entity Submitter

[Submit](#)



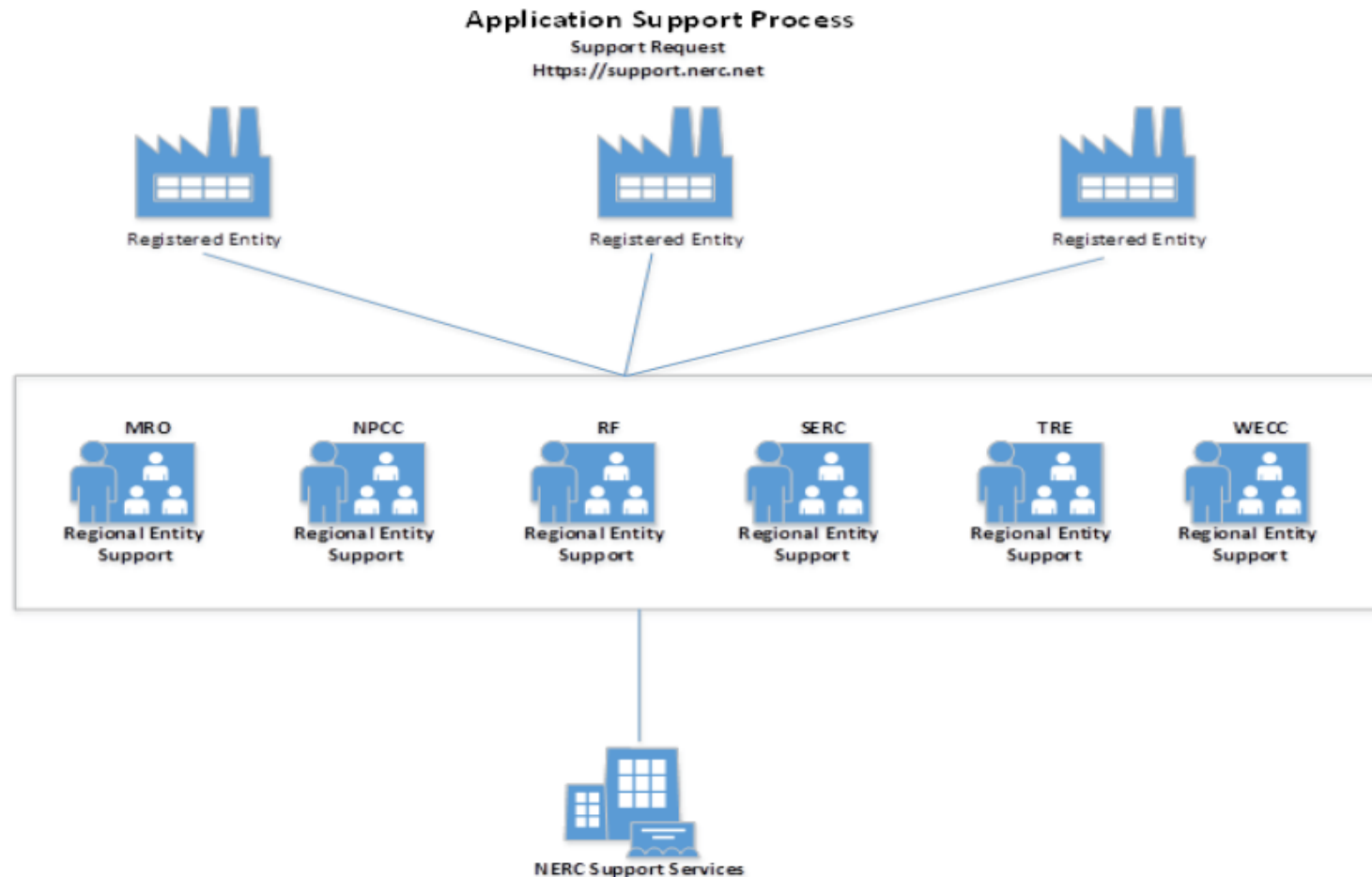
Align Support Model

➤ ERO Support Model and Process for Registered Entities



Entity Support: What to Expect

1. Regional Entity will be the first point of contact and resolution
2. The Regional Entity will escalate to NERC, if required for resolution
3. NERC may escalate to Bwise if unable to resolve with internal resources



NERC Helpdesk Ticket Submission System

NERC Helpdesk Ticket Submission System

[* required fields](#) | [Home](#) | [Contact Us](#)

Submit a new Ticket

Title * **Region *** **Priority ***

Service * **Category ***

File Attachment *(If you need to send multiple files, please create a single zip file)*

Your Personal Information


Last Name * <input type="text" value="Folt"/>	First Name * <input type="text" value="Bob"/>	Email Address * <input type="text" value="bob.folt@first.org"/>
User ID <input type="text"/>	Phone * <small>(Format: xxx-xxx-xxxx)</small> <input type="text" value="123-456-7890"/>	Company * <input type="text" value="ReliabilityFirst"/>

Description

Description * (1000 characters remaining)

Please complete the captcha below.


C8S YM6



NERC Helpdesk Ticket Submission System

➤ NERC Support – <https://support.nerc.net>



 * required fields | [Home](#) | [Contact Us](#)

Submit a new Ticket

Title * **Region *** **Priority ***

Service , please create a single zip file)


- Select
- ERO Enterprise Applications
- Standards
- Multi-Factor Authentication (MFA)
- NERC Datastores and Extranet Sites
- NERC Email Distribution List
- Other
- Websites
- Software
- Password Reset

First Name * **Email Address ***

Phone * (Format: xxx-xxx-xxxx) **Company ***

Description

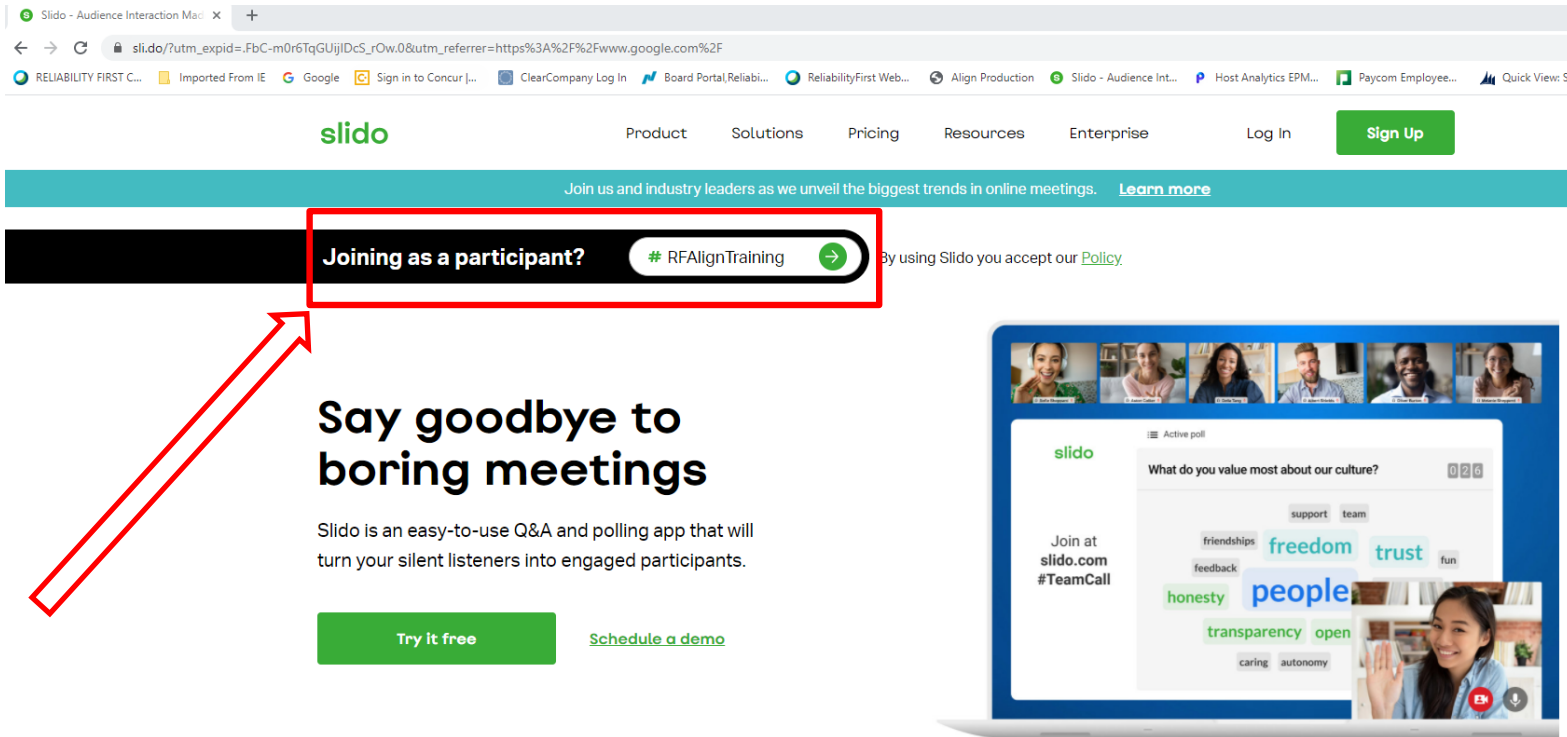
Description * (1000 characters remaining)





Section 1 – Slido Questions

- Login to **Slido.com** use the event code - **#RFAlignTraining**
- Optionally, via mobile device and scan the QR Code below



The screenshot shows the Slido website interface. At the top, there is a navigation bar with the Slido logo and links for Product, Solutions, Pricing, Resources, Enterprise, Log In, and Sign Up. Below the navigation bar is a teal banner with the text "Join us and industry leaders as we unveil the biggest trends in online meetings. [Learn more](#)". Underneath the banner is a black bar with the text "Joining as a participant?" followed by an input field containing "#RFAlignTraining" and a green arrow button. A red box highlights this input field, and a red arrow points from it to the text "Say goodbye to boring meetings". Below this text is a paragraph: "Slido is an easy-to-use Q&A and polling app that will turn your silent listeners into engaged participants." There are two buttons: "Try it free" and "Schedule a demo". To the right of the text is a laptop displaying a Slido poll interface with the question "What do you value most about our culture?" and various word cloud options like "freedom", "trust", "people", "honesty", "transparency", "open", "support", "team", "friendships", "feedback", "caring", "autonomy", and "fun".

Or Scan
QR Code



You can use Slido with



Questions & Answers

Forward Together  **ReliabilityFirst**

**BREAK
10 MINUTES**



SECTION 2

ALIGN SYSTEM – RELEASE 1 FUNCTIONALITY
ORIENTATION TO THE ALIGN SYSTEM DASHBOARD
SUBMITTING AND TRACKING A SELF-REPORT
SUBMITTING AND TRACKING MITIGATION ACTIVITIES AND PLANS
HOW TO VIEW AND TRACK OPEN ENFORCEMENT ACTIONS



Disclaimer on Registered Entity used as example

- **The slides that follow use Benton County Wind Farm, LLC as an example Registered Entity.**
- **The information contained in those slides is fictional and created solely for the purpose of demonstration.**
- **RF thanks Benton County Wind Farm, LLC for permitting this use of its name.**



ORIENTATION & DASHBOARD

ALIGN



Orientation & Dashboard

Assigned To Me



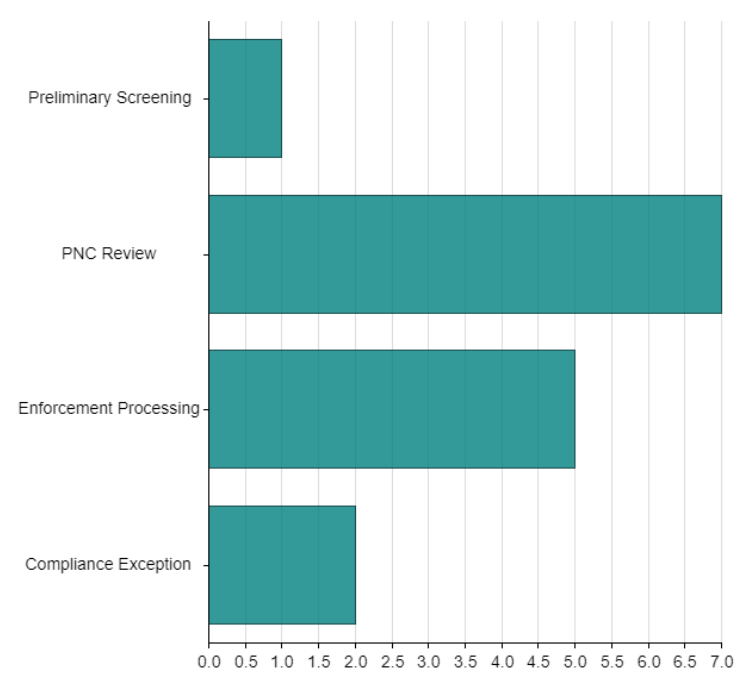
Welcome to Release 1 of the **Align** system! This is your **Dashboard** screen. Navigate the system by selecting activities above. You can create Self Reports and Self Logs from the **Compliance Monitoring** section. In the **Enforcement Processing** section, you see the status of Findings (both those you created and those created by your Regions). In the **Mitigation Management** section, you can edit and manage Mitigating Activities and Mitigation Plans.

NEWS AND UPDATES

MY TASKS

TYPE	UNIQUE ID	REGION OR LRE	STATUS	NCR	REGISTRATION	STANDARD	REQ	DUE DATE
Compliance Exception Letter	2021-00102 235021-	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5.	03/04/2021

STATUS OF MY FINDINGS



Orientation & Dashboard

My Align

- My Align
- Compliance Monitoring
- Enforcement Processing
- Mitigation Management
- Reports

Align For Entities

NCR00170 Editor 1 Benton County Wind Farm, LLC

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Compliance Exception Letter	2021-00102 235021-	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5.	03/04/2021

STATUS OF MY FINDINGS

Category	Count
Preliminary Screening	1
PNC Review	7
Enforcement Processing	5
Compliance Exception	2

Page 1 of 1

Waiting for nerc-trn.bwise.net...

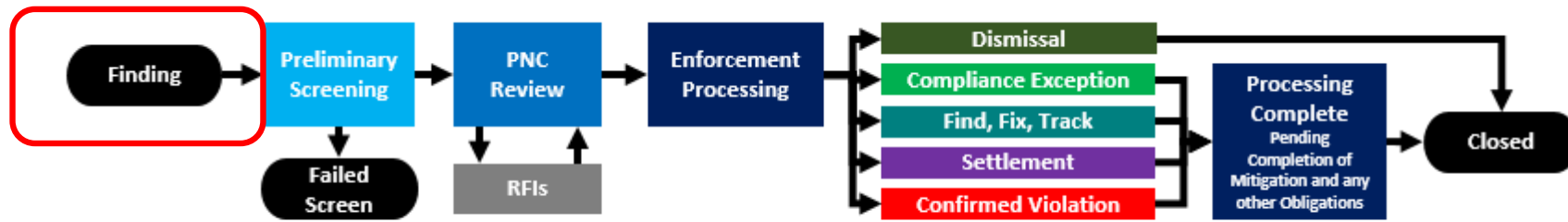


CREATING & SUBMITTING A FINDING

ALIGN



Creating & Submitting a Finding



Finding Process Summary



Creating & Submitting a Finding

My Align

Align For Entities

NCR00170 Editor 1 Benton County Wind Farm, LLC

Compliance Monitoring

Enforcement Processing

Mitigation Management

Reports

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STATUS OF MY FINDINGS

Status	Count
Preliminary Screening	1
PNC Review	7
Enforcement Processing	5
Compliance Exception	2

Page 1 of 1

Waiting for nerc-trn.bwise.net...



Creating & Submitting a Finding

Compliance Monitoring Align For Entities

Create New Self-Report or Log NCR00170 Editor 1 Benton County Wind Farm, LLC

MY REGISTRATIONS

REGISTRATION	APPLICABLE REQUIREMENTS
NCR00170 - Benton County Wind Farm, LLC in RF	Create Finding

INSTRUCTIONS

This is the Registered Entity Self Reporting and Logging page. On the left, you can view a set of Requirements applicable to a given Registration. Based on that, you can browse to a specific Requirement and create a Self Report (or Self Log, if you are in the Self Logging program). Below you can edit any draft Self Reports or Logs you have not yet submitted. To see the status of a Finding that is already in progress, select the **Enforcement Processing** activity from the pull-down on the upper left.

Page 1 of 1

MY DRAFTS

TYPE	UNIQUE ID	REGISTRATION	STANDARD AND REQUIREMENT	APPLICABLE FUNCTIONS	REGION(S) AND JURISDICTION	START DATE	CREATED ON
Self-Report	2021-00056	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a R1.	GO, GOP	RF-US		02/09/2021

Page 1 of 1



Creating & Submitting a Finding

The screenshot shows a web browser window with the URL https://nerc-trn.bwise.net/bwise/page/solution-app/#solution/RE/Registered_Entity_Acts_CM/CreateEditSRSL. The application is titled 'Compliance Monitoring' and the current view is 'Create Finding 2.0'. The main content area is a table titled 'SELECT APPLICABLE REQUIREMENT' with the following data:

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-005-6	R1.	+	•
CIP-005-6	R2.	+	•
CIP-006-6	R1.	+	•
CIP-006-6	R2.	+	•
CIP-006-6	R3.	+	•
CIP-007-6	R1.	+	•

At the bottom of the table, there is a pagination control showing 'Page 1 of 6'. To the right of the table is a 'FORM PORTLET' which is currently empty. The background of the application shows a sidebar with 'MY REGIS' and 'MY DRAFT' sections, and a top navigation bar with 'Align For Entities'.



Creating & Submitting a Finding

The screenshot displays the 'Create Finding 2.0' interface. On the left, a table titled 'SELECT APPLICABLE REQUIREMENT' lists various standards and requirements. The row for 'CIP-004-6 R5' has a '+' icon in the 'CREATE SELF-REPORT' column, which is highlighted with a red box. On the right, a detailed view of the selected requirement is shown, including its standard and requirement language, time horizon, measure, and applicability details.

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-005-6	R1.	+	•
CIP-005-6	R2.	+	•
CIP-006-6	R1.	+	•
CIP-006-6	R2.	+	•
CIP-006-6	R3.	+	•
CIP-007-6	R1.	+	•

REQUIREMENT

Standard and Requirement CIP-004-6 | R5.

Requirement Language Each Responsible Entity shall implement one or more documented access revocation program(s) that collectively include each of the applicable requirement parts in CIP-004-6 Table R5 – Access Revocation.

Time Horizon(s) Operations Planning Same-Day Operations
Violation Risk Factor (VRF) Medium

Measure M5. Evidence must include each of the applicable documented programs that collectively include each of the applicable requirement parts in CIP-004-6 Table R5 – Access Revocation and additional evidence to demonstrate implementation as described in the Measures column of the table.

Requirement Applicability BA
TOP
TO
RC
IA
GOP
DP
GO

Additional Applicability Details 4.1. Functional Entities: For the purpose of the requirements contained herein, the following list of functional entities will be collectively referred to as "Responsible Entities." For requirements in this standard where a specific functional entity or subset of functional entities are the applicable entity or entities, the functional entity or entities are specified explicitly.
4.1.1. Balancing Authority
4.1.2. Distribution Provider that owns one or more of the following Facilities, systems, and equipment for the protection or restoration of the BES:
4.1.2.1. Each underfrequency Load shedding (UFLS) or undervoltage Load shedding (UVLS) system that:
4.1.2.1.1. is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and
4.1.2.1.2. performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.
4.1.2.2. Each Special Protection System (SPS) or Remedial Action Scheme (RAS) where the SPS or RAS is subject to one or more requirements in a NERC or Regional Reliability Standard.
4.1.2.3. Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard



Creating & Submitting a Finding

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 * [NCR00170 - Benton County Wind Farm, LLC in RF](#)

Applicable Requirement [CIP-004-6 R5.](#)

Applicable Part(s) [CIP-004-6 R5.1.](#) × [CIP-004-6 R5.2.](#) × [CIP-004-6 R5.3.](#) × [CIP-004-6 R5.4.](#) × [CIP-004-6 R5.5.](#) ×

Applicable Reliability * [GO](#) × [GOP](#) ×

Region – Jurisdiction in which the Potential Noncompliance occurred [RF-US](#)

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

Discovery and Description









When was the Potential

When did the Potential

[Save](#) [Close](#)



Creating & Submitting a Finding

Discovery and Description	
When was the Potential Noncompliance discovered?*	03/05/2021 
How was this Potential Noncompliance discovered? * 	Issue was discovered during a monthly internal control check of revocation requests.
Please describe the Potential Noncompliance in detail * 	Employee terminated effective Friday, February 19, 2021. An access revocation request was created that morning, but was not acted upon until the next business day, Monday, February 22, 2021.
When did the Potential Noncompliance start? * 	02/20/2021 
What is the basis for your selecting this start date? *	Access should have been revoked within 24 hours of termination, which occurred at 5:00 pm on February 19th.
Is the Potential Noncompliance still occurring? *	No 
When did you return to compliance? * 	03/05/2021 



Creating & Submitting a Finding

discovered?*

How was this Potential Noncompliance discovered? *

Issue was discovered during a monthly internal control check of revocation requests.

Please describe the Potential Noncompliance in detail *

Employee terminated effective Friday, February 19, 2021. An access revocation request was created that morning, but was not acted upon until the next business day, Monday, February 22, 2021.

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

Access should have been revoked within 24 hours of termination, which occurred at 5:00 pm on February 19th.

Is the Potential Noncompliance still occurring? *

No

When did you return to compliance? *

03/05/2021

Extent of Condition and Root Cause

Has an Extent of Condition Review been performed? *

-- None --
Yes
No
In Progress

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

Risk and Impact

Save Close



Creating & Submitting a Finding

discovered?*

How was this Potential Noncompliance discovered? *

Issue was discovered during a monthly internal control check of revocation requests.

Please describe the Potential Noncompliance in detail *

Employee terminated effective Friday, February 19, 2021. An access revocation request was created that morning, but was not acted upon until the next business day, Monday, February 22, 2021.

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

Access should have been revoked within 24 hours of termination, which occurred at 5:00 pm on February 19th.

Is the Potential Noncompliance still occurring? *

No

When did you return to compliance? *

03/05/2021

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? *

Reviewed all revocation requests created in 2021, and found no additional instances.

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

Employee responsible for created access revocation ticket set the due date for the next business day, as opposed to 24 hours.

Save **Close**



Creating & Submitting a Finding

Risk and Impact

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

Minimal ▼

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

Employee's access badge and company-issued laptop were confiscated upon termination, limiting the employee's physical and electronic access.
Shared account passwords were changed immediately.

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

Not likely

Was there any actual impact to the BPS? * ⓘ

No ▼

Additional Comments

Please provide any additional comments



Creating & Submitting a Finding

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 save this Self-Report.

Mitigation Information (optional - click to expand)

FORM: RE-SR2-Create

Save

Close



Creating & Submitting a Finding

Compliance Monitoring Align For Entities

Create New Self-Report or Log NCR00170 Editor 1 Benton County Wind Farm, LLC

MY REGISTRATIONS

REGISTRATION	APPLICABLE REQUIREMENTS
NCR00170 - Benton County Wind Farm, LLC in RF	Create Finding

INSTRUCTIONS

This is the Registered Entity Self Reporting and Logging page. On the left, you can view a set of Requirements applicable to a given Registration. Based on that, you can browse to a specific Requirement and create a Self Report (or Self Log, if you are in the Self Logging program). Below you can edit any draft Self Reports or Logs you have not yet submitted. To see the status of a Finding that is already in progress, select the **Enforcement Processing** activity from the pull-down on the upper left.

Page 1 of 1

MY DRAFTS

TYPE	UNIQUE ID	REGISTRATION	STANDARD AND REQUIREMENT	APPLICABLE FUNCTIONS	REGION(S) AND JURISDICTION	START DATE	CREATED ON
Self-Report	2021-00206	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6 R5.	GO, GOP	RF-US	03/20/2021	03/22/2021
Self-Report	2021-00056	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a R1.	GO, GOP	RF-US		02/09/2021

Page 1 of 1



Creating & Submitting a Finding

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:

RF|NCR00170|VI2021-00206|VI2021-00206|CIP-004-6|R5.|5.3.,5.1.

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

Mitigation Information (optional - click to expand)

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.

Warning

You have not selected an Action. If you click Save and Action, you will receive this error message. You can either click Save, or you can choose an Action (either Submit or Delete) and then click Save and Action.

click [here](#) to print

FORM: RE-SF2-Editor

Action *

Submit Mitigations for Review with Finding?

Save and Action

Save

Close



Creating & Submitting a Finding

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.

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Close: Click the Close button at the bottom of the screen to close the window.

Action *

Submit

Submit Mitigations for Review with Finding? 

click [here](#) to print

FORM: RE-SR2-Editor

Save and Action

Save

Close



Creating & Submitting a Finding

Compliance Monitoring Align For Entities

Create New Self-Report or Log NCR00170 Editor 1 Benton County Wind Farm, LLC

MY REGISTRATIONS

REGISTRATION	APPLICABLE REQUIREMENTS
NCR00170 - Benton County Wind Farm, LLC in RF	Create Finding

Page 1 of 1

INSTRUCTIONS

This is the Registered Entity Self Reporting and Logging page. On the left, you can view a set of Requirements applicable to a given Registration. Based on that, you can browse to a specific Requirement and create a Self Report (or Self Log, if you are in the Self Logging program). Below you can edit any draft Self Reports or Logs you have not yet submitted. To see the status of a Finding that is already in progress, select the **Enforcement Processing** activity from the pull-down on the upper left.

MY DRAFTS

✓ Action succeeded

TYPE	UNIQUE ID	REGISTRATION	STANDARD AND REQUIREMENT	APPLICABLE FUNCTIONS	REGION(S) AND JURISDICTION	START DATE	CREATED ON
Self-Report	2021-00056	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a R1.	GO, GOP	RF-US		02/09/2021

Page 1 of 1



Creating & Submitting a Finding

The screenshot shows a web application interface for creating a finding. The main window is titled "Create Finding 2.0" and contains a table with columns for "STANDARD", "REQ", "CREATE SELF-REPORT", and "CREATE SELF-LOG". A red box highlights the "CREATE SELF-LOG" column. The table lists various standards and requirements, each with a plus sign in the "CREATE SELF-REPORT" column and a radio button in the "CREATE SELF-LOG" column. A "FORM PORTLET" is visible on the right side of the window.

STANDARD	REQ	CREATE SELF-REPORT	CREATE SELF-LOG
CIP-002-5.1a	R1.	+	<input type="radio"/>
CIP-002-5.1a	R2.	+	<input type="radio"/>
CIP-003-8	R1.	+	<input type="radio"/>
CIP-003-8	R2.	+	<input type="radio"/>
CIP-003-8	R3.	+	<input type="radio"/>
CIP-003-8	R4.	+	<input type="radio"/>
CIP-004-6	R1.	+	<input type="radio"/>
CIP-004-6	R2.	+	<input type="radio"/>
CIP-004-6	R3.	+	<input type="radio"/>
CIP-004-6	R4.	+	<input type="radio"/>
CIP-004-6	R5.	+	<input type="radio"/>
CIP-005-6	R1.	+	<input type="radio"/>
CIP-005-6	R2.	+	<input type="radio"/>
CIP-006-6	R1.	+	<input type="radio"/>
CIP-006-6	R2.	+	<input type="radio"/>
CIP-006-6	R3.	+	<input type="radio"/>
CIP-007-6	R1.	+	<input type="radio"/>



TRACKING SUBMITTED FINDINGS THROUGH PRELIMINARY SCREENING

ALIGN



Tracking Submitted Findings Through Preliminary Screening

Compliance Monitoring Align For Entities

My Align NCR00170 Editor 1 Benton County Wind Farm, LLC

Compliance Monitoring

Enforcement Processing

Mitigation Management

Reports

APPLICABLE REQUIREMENTS

Create Finding

INSTRUCTIONS

This is the Registered Entity Self Reporting and Logging page. On the left, you can view a set of Requirements applicable to a given Registration. Based on that, you can browse to a specific Requirement and create a Self Report (or Self Log, if you are in the Self Logging program). Below you can edit any draft Self Reports or Logs you have not yet submitted. To see the status of a Finding that is already in progress, select the **Enforcement Processing** activity from the pull-down on the upper left.

Page 1 of 1

MY DRAFTS

TYPE	UNIQUE ID	REGISTRATION	STANDARD AND REQUIREMENT	APPLICABLE FUNCTIONS	REGION(S) AND JURISDICTION	START DATE	CREATED ON
Self-Report	2021-00056	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a R1.	GO, GOP	RF-US		02/09/2021

Page 1 of 1



Tracking Submitted Findings Through Preliminary Screening

My Align Align For Entities

My Dashboard and Tasks NCR00170 Editor 1 Benton County Wind Farm, LLC

Assigned To Me

ALIGN TRAINING

Welcome to Release 1 of the **Align** system! This is your **Dashboard** screen. Navigate the system by selecting activities above. You can create Self Reports and Self Logs from the **Compliance Monitoring** section. In the **Enforcement Processing** section, you see the status of Findings (both those you created and those created by your Regions). In the **Mitigation Management** section, you can edit and manage Mitigating Activities and Mitigation Plans.

MY TASKS

TYPE	UNIQUE ID	REGION OR LRE	STATUS	NCR	REGISTRATION	STANDARD	REQ	DUE DATE
Compliance Exception Letter	2021-00102 235021-	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5.	03/04/2021

NEWS AND UPDATES

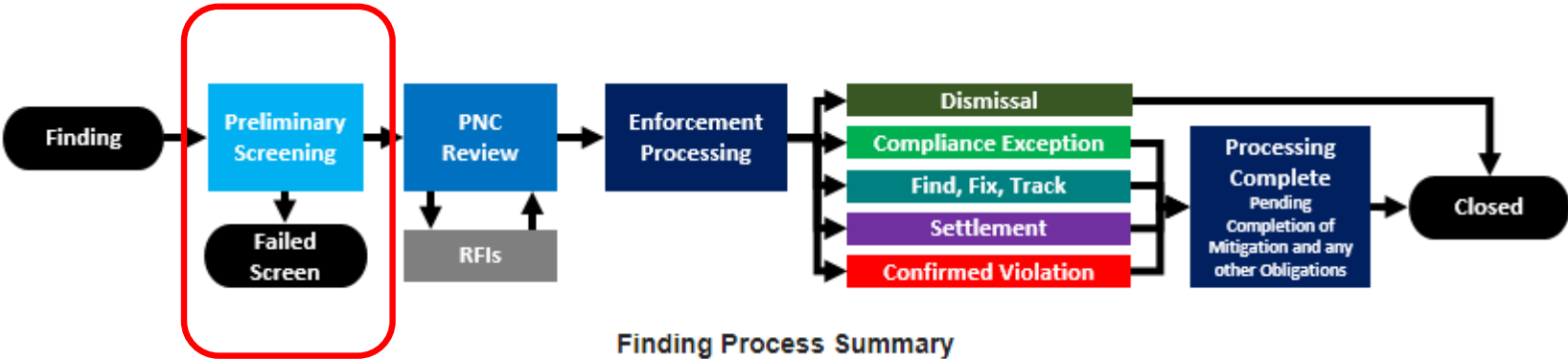
STATUS OF MY FINDINGS

Status	Count
Preliminary Screening	2
PNC Review	7
Enforcement Processing	5
Compliance Exception	2

Page 1 of 1



Tracking Submitted Findings Through Preliminary Screening



Tracking Submitted Findings Through Preliminary Screening

My Align

- My Align
- Compliance Monitoring
- Enforcement Processing
- Mitigation Management
- Reports

Align For Entities

NCR00170 Editor 1 Benton County Wind Farm, LLC

Welcome to Release 1 of the **Align** system! This is your **Dashboard** screen. Navigate the system by selecting activities above. You can create Self Reports and Self Logs from the **Compliance Monitoring** section. In the **Enforcement Processing** section, you see the status of Findings (both those you created and those created by your Regions). In the **Mitigation Management** section, you can edit and manage Mitigating Activities and Mitigation Plans.

MY TASKS

TYPE	UNIQUE ID	REGION OR LRE	STATUS	NCR	REGISTRATION	STANDARD	REQ	DUE DATE
Compliance Exception Letter	2021-00102 235021-	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5.	03/04/2021

STATUS OF MY FINDINGS

Category	Count
Preliminary Screening	2.0
PNC Review	7.0
Enforcement Processing	5.0
Compliance Exception	2.0

Page 1 of 1



Tracking Submitted Findings Through Preliminary Screening

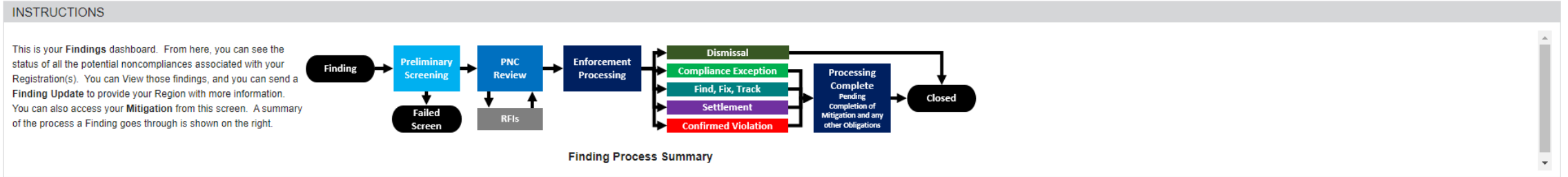
Enforcement Processing Align For Entities

My Open Findings My Closed Findings NCR00170 Editor 1 Benton County Wind Farm, LLC

MY OPEN FINDINGS

MONITORING METHOD	UNIQUE ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	FINDING STATUS	SEND UPDATE	MITIGATION
Self-Report	2021-00206	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/20/2021	Preliminary Screening	+	Mitigating Activities Draft
Self-Report	2021-00203	RF	03/17/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	03/15/2021	Preliminary Screening	+	Mitigating Activities Draft
Self-Report	2021-00166	RF	03/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	03/08/2021	PNC Review	+	Mitigating Activities Active
Self-Report	2021-00104	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2021-00103	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Log	2021-00102	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Active
Self-Report	2021-00055	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/05/2021	Enforcement Processing	+	Mitigating Activities Complete
Self-Report	2021-00050	RF	02/04/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	02/01/2021	PNC Review	+	Mitigating Activities In Verification
Self-Report	2021-00015	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R1.	01/13/2021	PNC Review	+	Mitigating Activities Complete
Self-Report	2021-00014	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	01/09/2021	PNC Review	+	Mitigation Plan NERC Processing
Self-Report	2021-00002	RF	01/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	10/05/2020	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2020-00790	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	09/28/2020	PNC Review	+	Mitigating Activities Draft
Self-Report	2020-00789	RF	01/20/2021	NCR00170 - Benton County Wind Farm, LLC in RF	VAR-002-4.1	R1.	10/26/2020	PNC Review	+	Mitigation Plan Complete

Page 1 of 1




Tracking Submitted Findings Through Preliminary Screening

Mon 3/22/2021 11:58 AM
noreply@bwise.net
RE Notification that PNC has passed screening (2021-00206)
To: AlignR1Testing@nerc.com

Phish Alert V2 + Get more apps

[WARNING: EXTERNAL EMAIL]: Please use CAUTION before replying or opening links/attachments. Please report any suspicious links/attachments or requests for sensitive information.

 **ALIGN** Automatic email alert

Date Noncompliance Submitted: 2021-03-22
Region: RF

On 2021-03-22, RF has conducted a preliminary screen review of the noncompliance and made the determination that the noncompliance is not a duplicate of an existing Open Enforcement Action (OEA) and applies to entity during the time of noncompliance. The unique ID associated with this noncompliance is 2021-00206.

The registered entity must preserve all documentation pertaining to this matter. Documentation includes, but is not limited to, operator logs, recorded voice communications, email and written correspondence, work orders, inspection records, patrol records, and any other documents that may be directly or indirectly related to this matter.

To view the current status of 2021-00206, log into Align.
At this time, RF is still gathering information upon which to base a decision regarding the appropriate disposition method for the noncompliance.

If you have not already done so, RF encourages you to promptly communicate your mitigating activities to address noncompliance and prevent reoccurrence. To do so, please login to align and navigate to record 2021-00206, then click on the attached mitigation record 2021-00206-M and fill out all mitigation information.

To access Align, go to the ERO portal, navigate to the Align landing page and click on the link to log in.

This e-mail has been generated automatically. Do not reply to this address.

Sincerely,
Team Align



Tracking Submitted Findings Through Preliminary Screening

Enforcement Processing Align For Entities

My Open Findings My Closed Findings NCR00170 Editor 1 Benton County Wind Farm, LLC

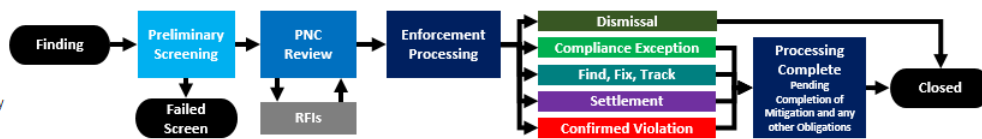
MY OPEN FINDINGS

MONITORING METHOD	UNIQUE ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	FINDING STATUS	SEND UPDATE	MITIGATION
Self-Report	2021-00206	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/20/2021	PNC Review	-	Mitigating Activities Draft
Self-Report	2021-00203	RF	03/17/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	03/15/2021	Preliminary Screening	+	Mitigating Activities Draft
Self-Report	2021-00166	RF	03/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	03/08/2021	PNC Review	+	Mitigating Activities Active
Self-Report	2021-00104	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2021-00103	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Log	2021-00102	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Active
Self-Report	2021-00055	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/05/2021	Enforcement Processing	+	Mitigating Activities Complete
Self-Report	2021-00050	RF	02/04/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	02/01/2021	PNC Review	+	Mitigating Activities In Verification
Self-Report	2021-00015	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R1.	01/13/2021	PNC Review	+	Mitigating Activities Complete
Self-Report	2021-00014	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	01/09/2021	PNC Review	+	Mitigation Plan NERC Processing
Self-Report	2021-00002	RF	01/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	10/05/2020	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2020-00790	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	09/28/2020	PNC Review	+	Mitigating Activities Draft
Self-Report	2020-00789	RF	01/20/2021	NCR00170 - Benton County Wind Farm, LLC in RF	VAR-002-4.1	R1.	10/26/2020	PNC Review	+	Mitigation Plan Complete

Page 1 of 1

INSTRUCTIONS

This is your Findings dashboard. From here, you can see the status of all the potential noncompliances associated with your Registration(s). You can View those findings, and you can send a Finding Update to provide your Region with more information. You can also access your Mitigation from this screen. A summary of the process a Finding goes through is shown on the right.



Finding Process Summary

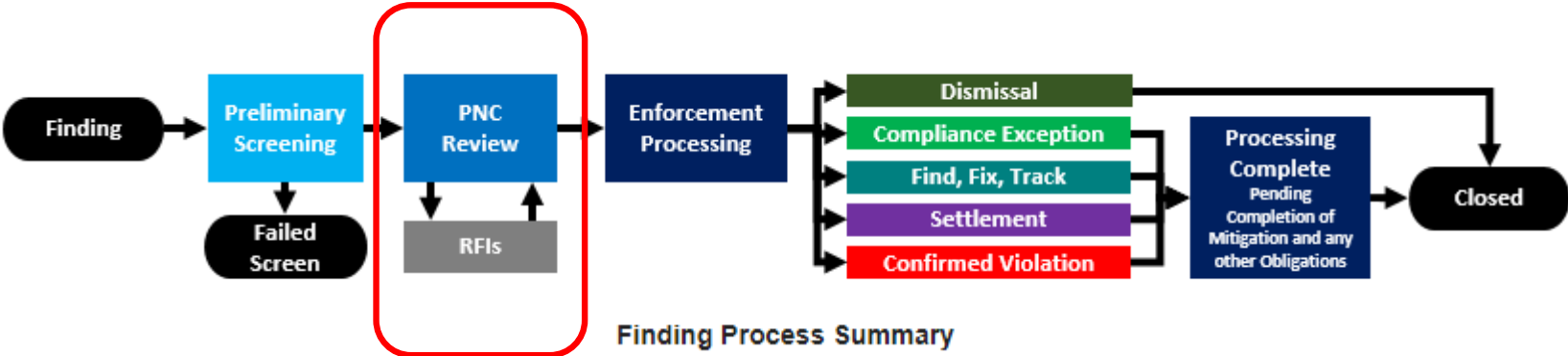


BUILDING THE CASE FILE IN THE PNC REVIEW STAGE

ALIGN



Building the Case File in the PNC Review Stage




Building the Case File in the PNC Review Stage

Mon 3/22/2021 12:17 PM
noreply@bwise.net
Review and Respond to RFI (RF21-000365)
To: AlignR1Testing@nerc.com

Phish Alert V2 + Get more apps

[WARNING: EXTERNAL EMAIL]: Please use CAUTION before replying or opening links/attachments. Please report any suspicious links/attachments or requests for sensitive information.

 **Automatic email alert**

Noncompliance ID: 2021-00206

RF has created a Request for Information (RFI) for the noncompliance record 2021-00206 in the Align System. The response for the RFI is due by 2021-04-21. To see the RFI, please log into the Align system. If there are any questions regarding this notice, please contact patricko at Patrick.o'connor@rfirst.org.

To access Align, go to the ERO portal, navigate to the Align landing page and click on the link to log in.


This e-mail has been generated automatically. Do not reply to this address.

Sincerely,
Team Align



Building the Case File in the PNC Review Stage

Assigned To Me



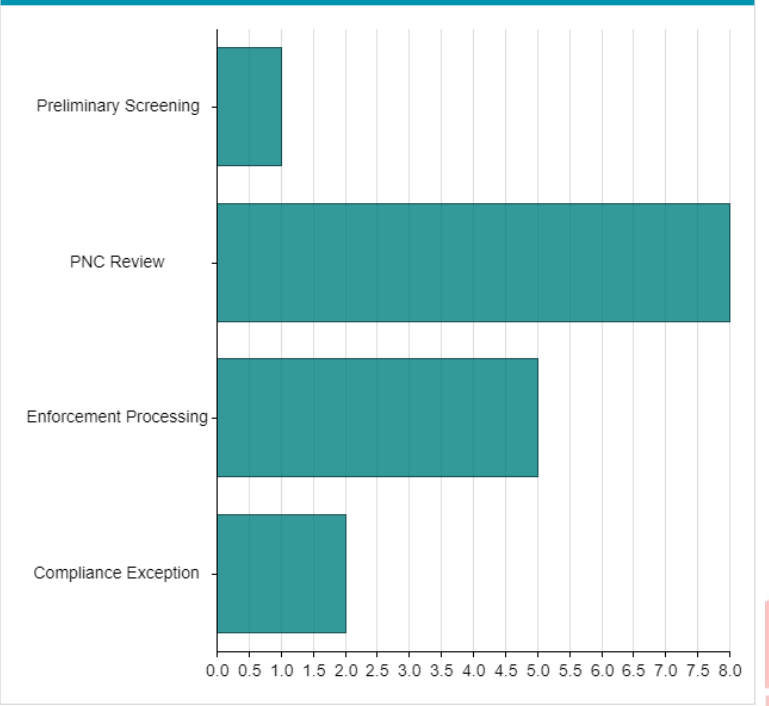
Welcome to Release 1 of the **Align** system! This is your **Dashboard** screen. Navigate the system by selecting activities above. You can create Self Reports and Self Logs from the **Compliance Monitoring** section. In the **Enforcement Processing** section, you see the status of Findings (both those you created and those created by your Regions). In the **Mitigation Management** section, you can edit and manage Mitigating Activities and Mitigation Plans.

NEWS AND UPDATES

MY TASKS

STATUS OF MY FINDINGS

TYPE	UNIQUE ID	REGION OR LRE	STATUS	NCR	REGISTRATION	STANDARD	REQ	DUE DATE
Compliance Exception Letter	2021-00102 235021-	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5.	03/04/2021
RFI for Finding	2021-00206 RF21-000365	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5.	04/21/2021



Building the Case File in the PNC Review Stage

My Align

Align For Entities

2021-00206 | RF21-000365

Request for Information

Original Finding 2021-00206

Requestor Patrick O'Connor

Requestor Comments Where and how were the employee's access card and laptop stored over the weekend before the revocation was officially completed?

Requestor Attachments [RFI.docx](#) 11.12 KB

Request Sent On March 22, 2021

Response Due By April 21, 2021

Respondent Comments

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: **RF|NCR00170|VI2021-00206|VI2021-00206,RF21-000365|||**

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.

RF21-000365 FORM: RE-RFI2-Review

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

Page 1 of 1

0.0 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 5.5 6.0 6.5 7.0 7.5 8.0



Building the Case File in the PNC Review Stage

My Align

Align For Entities

2021-00206 | RF21-000365

Request for Information

Original Finding 2021-00206

Requestor Patrick O'Connor

Requestor Comments Where and how were the employee's access card and laptop stored over the weekend before the revocation was officially completed?

Requestor Attachments [RFI.docx](#) 11.12 KB

Request Sent On March 22, 2021

Response Due By April 21, 2021

Respondent Comments

Paragraph Helvetica ... 14px

Timestamp

The employee's laptop and access card were secured in the security operations center until the revocation was formally completed.

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:
RF|NCR00170|VI2021-00206|VI2021-00206,RF21-000365||

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.

RF21-000365 FORM: RE-RFI2-Review

Save and Action Save Close

Page 1 of 1


0.0 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 5.5 6.0 6.5 7.0 7.5 8.0

Building the Case File in the PNC Review Stage

My Align
Align For Entities

My Dashboard and Tasks
NCR00170 Editor 1 Benton County Wind Farm, LLC

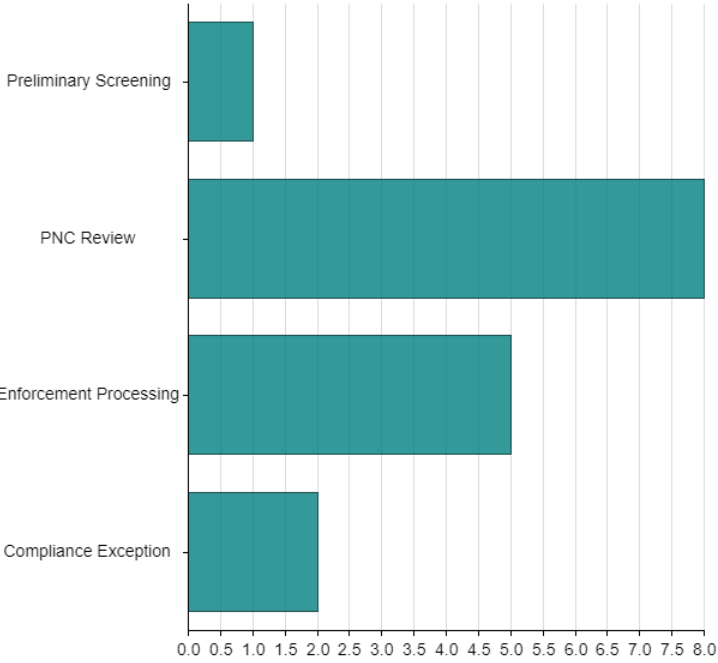
Assigned To Me



Welcome to Release 1 of the **Align** system! This is your **Dashboard** screen. Navigate the system by selecting activities above. You can create Self Reports and Self Logs from the **Compliance Monitoring** section. In the **Enforcement Processing** section, you see the status of Findings (both those you created and those created by your Regions). In the **Mitigation Management** section, you can edit and manage Mitigating Activities and Mitigation Plans.

NEWS AND UPDATES

STATUS OF MY FINDINGS



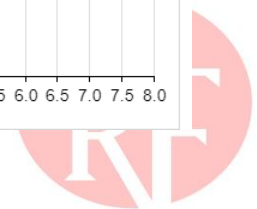
Category	Count
Preliminary Screening	1
PNC Review	8
Enforcement Processing	5
Compliance Exception	2

MY TASKS

✓ Action succeeded
✕

TYPE	UNIQUE ID	REGION OR LRE	STATUS	NCR	REGISTRATION	STANDARD	REQ	DUE DATE
Compliance Exception Letter	2021-00102 235021-	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5	03/04/2021

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Page 1 of 1
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Building the Case File in the PNC Review Stage

My Align

- My Align
- Compliance Monitoring
- Enforcement Processing**
- Mitigation Management
- Reports

Align For Entities

NCR00170 Editor 1 Benton County Wind Farm, LLC

NEWS AND UPDATES

Welcome to Release 1 of the **Align** system! This is your **Dashboard** screen. Navigate the system by selecting activities above. You can create Self Reports and Self Logs from the **Compliance Monitoring** section. In the **Enforcement Processing** section, you see the status of Findings (both those you created and those created by your Regions). In the **Mitigation Management** section, you can edit and manage Mitigating Activities and Mitigation Plans.

MY TASKS

TYPE	UNIQUE ID	REGION OR LRE	STATUS	NCR	REGISTRATION	STANDARD	REQ	DUE DATE
Compliance Exception Letter	2021-00102 235021-	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5.	03/04/2021

Page 1 of 1

STATUS OF MY FINDINGS

Category	Count
Preliminary Screening	1.0
PNC Review	8.0
Enforcement Processing	5.0
Compliance Exception	2.0



Building the Case File in the PNC Review Stage

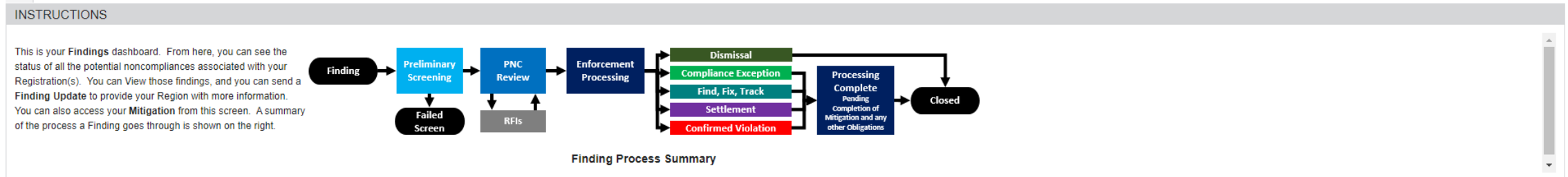
Enforcement Processing Align For Entities

My Open Findings My Closed Findings NCR00170 Editor 1 Benton County Wind Farm, LLC

MY OPEN FINDINGS

MONITORING METHOD	UNIQUE ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	FINDING STATUS	SEND UPDATE	MITIGATION
Self-Report	2021-00206	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/20/2021	PNC Review	+	Mitigating Activities Draft
Self-Report	2021-00203	RF	03/17/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	03/15/2021	Preliminary Sp	+	Mitigating Activities Draft
Self-Report	2021-00166	RF	03/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	03/08/2021	PNC Review	+	Mitigating Activities Active
Self-Report	2021-00104	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2021-00103	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Log	2021-00102	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Active
Self-Report	2021-00055	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/05/2021	Enforcement Processing	+	Mitigating Activities Complete
Self-Report	2021-00050	RF	02/04/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	02/01/2021	PNC Review	+	Mitigating Activities In Verification
Self-Report	2021-00015	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R1.	01/13/2021	PNC Review	+	Mitigating Activities Complete
Self-Report	2021-00014	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	01/09/2021	PNC Review	+	Mitigation Plan NERC Processing
Self-Report	2021-00002	RF	01/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	10/05/2020	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2020-00790	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	09/28/2020	PNC Review	+	Mitigating Activities Draft
Self-Report	2020-00789	RF	01/20/2021	NCR00170 - Benton County Wind Farm, LLC in RF	VAR-002-4.1	R1.	10/26/2020	PNC Review	+	Mitigation Plan Complete

Page 1 of 1



Building the Case File in the PNC Review Stage

Create Finding Update

Compliance Enforcement Authority: RF

Monitoring Method: Self-Report

Applicable Requirement: CIP-004-6 R5.

Instructions: Provide additional information in the fields below. Only complete the areas you want to update. If you do not have additional information to provide or the information has not changed, please leave the field blank.

Summary of Finding Update

Paragraph | Helvetica ... | 14px | B | I | U | Timestamp

Dates

The date the Potential Noncompliance started: [Calendar Icon]

The date you returned to compliance: [Calendar Icon]

Your basis for selecting the start date: [Text Area]

Extent of Condition, Root Cause, and Risk

The Extent of the Condition: [Text Area]

The Potential Impact to BPS of this Potential Noncompliance: [Dropdown Menu]

Your explanation why you chose the Potential Impact: [Text Area]

Update Close



Building the Case File in the PNC Review Stage

Create Finding Update

Compliance Enforcement Authority: RF

Monitoring Method: Self-Report

Applicable Requirement: CIP-004-6 R5.

Instructions: Provide additional information in the fields below. Only complete the areas you want to update. If you do not have additional information to provide or the information has not changed, please leave the field blank.

Summary of Finding Update *
During a regularly scheduled weekly check, we identified another instance where an access revocation request was submitted on a Friday, but not actioned until the following Monday. In this case, the employee was transferring to another role and no longer needed the same level of access that was previously authorized. The issue was identified and corrected that Monday.

Dates

The date the Potential Noncompliance started: 03/14/2021

The date you returned to compliance: 03/15/2021

Your basis for selecting the start date: The employee's transfer was effected on March 12, 2021, requiring access revocation to be completed by the end of the day on March 12th.



Building the Case File in the PNC Review Stage

Extent of Condition, Root Cause, and Risk

The Extent of the Condition	Completed another review of any access revocation requests created since the last review and determined that this was the only one that did not have the due date listed correctly.	The Potential Impact to BPS of this Potential Noncompliance	Minimal
The cause(s) that led to the Potential Noncompliance	In this case, the employee creating the request listed the date for the next business day, not the next calendar day as required.	Your explanation why you chose the Potential Impact	The employee was merely transferring roles and was still in good standing. The employee had up-to-date NERC CIP training and an active Personnel Risk Assessment.
		The likelihood the Impact could have actually occurred	Not likely
		The Actual Impact (Harm) to the BPS	None

FORM: RE-FUP2-Create

Update Close



Building the Case File in the PNC Review Stage

Enforcement Processing Align For Entities

My Open Findings My Closed Findings NCR00170 Editor 1 Benton County Wind Farm, LLC

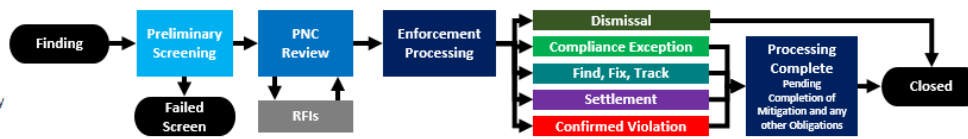
MY OPEN FINDINGS

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Self-Report	2021-00206	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/20/2021	PNC Review	+	Mitigating Activities Draft
Self-Report	2021-00203	RF	03/17/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	03/15/2021	Preliminary Screening	+	Mitigating Activities Draft
Self-Report	2021-00166	RF	03/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	03/08/2021	PNC Review	+	Mitigating Activities Active
Self-Report	2021-00104	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2021-00103	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Log	2021-00102	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Active
Self-Report	2021-00055	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/05/2021	Enforcement Processing	+	Mitigating Activities Complete
Self-Report	2021-00050	RF	02/04/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	02/01/2021	PNC Review	+	Mitigating Activities In Verification
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Self-Report	2021-00014	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	01/09/2021	PNC Review	+	Mitigation Plan NERC Processing
Self-Report	2021-00002	RF	01/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	10/05/2020	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2020-00790	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	09/28/2020	PNC Review	+	Mitigating Activities Draft
Self-Report	2020-00789	RF	01/20/2021	NCR00170 - Benton County Wind Farm, LLC in RF	VAR-002-4.1	R1.	10/26/2020	PNC Review	+	Mitigation Plan Complete

Page 1 of 1

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Finding Process Summary



Building the Case File in the PNC Review Stage

Enforcement Processing 2021-00206

Noncompliance? * Why do you believe that to be the correct Potential Impact? * Employee's access badge and company-issued laptop were confiscated upon termination, limiting the employee's physical and electronic access. Shared account passwords were changed immediately.

Was there any actual impact to the BPS? * No

Additional Comments

Please provide any additional comments

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: RF|NCR00170|VI2021-00206|VI2021-00206|CIP-004-6|R5.15.3.5.1.

Related Items

SUBMITTED FINDING UPDATES	
UNIQUE ID	SENT
UF21-00035	03/22/2021

REQUESTS FOR INFORMATION	
ID	RESPOND BY
RF21-000365	Response Received

Close

Finding Process Summary



SUBMITTING MITIGATION

ALIGN



Submitting Mitigation

Enforcement Processing

Align For Entities

NCR00170 Editor 1 Benton County Wind Farm, LLC

	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	FINDING STATUS	SEND UPDATE	MITIGATION
	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	03/01/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/20/2021	PNC Review	+	Mitigating Activities Draft
Self-Report	RF	03/17/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	03/15/2021	Preliminary Screening	+	Mitigating Activities Draft
Self-Report	RF	03/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	03/08/2021	PNC Review	+	Mitigating Activities Active
Self-Report	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Log	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Active
Self-Report	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/05/2021	Enforcement Processing	+	Mitigating Activities Complete

Page 1 of 1

INSTRUCTIONS

This is your **Findings** dashboard. From here, you can see the status of all the potential noncompliances associated with your Registration(s). You can View those findings, and you can send a **Finding Update** to provide your Region with more information. You can also access your **Mitigation** from this screen. A

```

    graph LR
      Finding([Finding]) --> Preliminary[Preliminary Screening]
      Preliminary --> PNC[PNC Review]
      PNC --> Enforcement[Enforcement Processing]
      Enforcement --> Dismissal[Dismissal]
      Enforcement --> Compliance[Compliance Exception]
      Enforcement --> FindFix[Find, Fix, Track]
      Enforcement --> Settlement[Settlement]
      Dismissal --> Processing[Processing Complete]
      Compliance --> Processing
      FindFix --> Processing
      Settlement --> Processing
      Processing --> Closed([Closed])
  
```



Submitting Mitigation

Mitigation Management Align For Entities

My Draft Mitigations | My Active Mitigations | Consolidated Mitigations | Completed Mitigations

NCR00170 Editor 1 Benton County Wind Farm, LLC

MY DRAFT MITIGATIONS

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	START DATE
Mitigating Activities	2020-00788	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-008-5	R3.	RF-US	03/02/2020
Mitigating Activities	2020-00790	RF	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	RF-US	09/28/2020
Mitigating Activities	2021-00002	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	RF-US	10/05/2020
Mitigating Activities	2021-00103	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	RF-US	02/23/2021
Mitigating Activities	2021-00104	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/23/2021
Mitigating Activities	2021-00203	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	RF-US	03/15/2021
Mitigating Activities	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/20/2021
Mitigating Activities	2021-00207	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	03/01/2021

Page 1 of 1

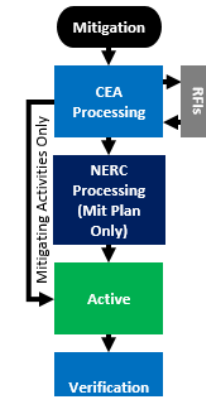
RELATED DRAFT MITIGATION MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE
Remediating Action	2021-00014 2021-000032	Revocation of access	01/11/2021
Preventative Control	2021-00014 2021-000033	Update revocation process	01/22/2021
Remediating Action	2021-00050 2021-000058	tes	02/05/2021
Preventative Control	2021-00050 2021-000059	test	02/12/2021

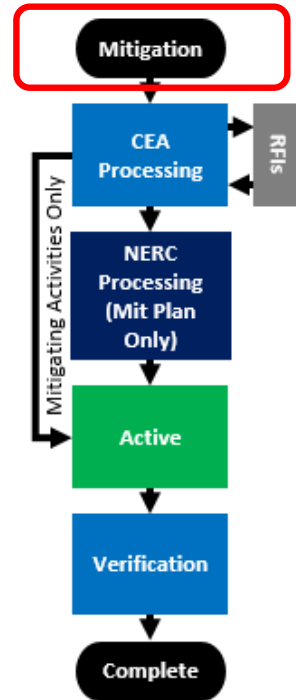
Page 1 of 1

INSTRUCTIONS

These are your Mitigation Management Screens. The **Draft Mitigations** screen shows you all your draft Mitigating Activities, as well as those that have been returned to you for more work or converted to a Mitigation Plan (both indicated with a yellow triangle). The **Active Mitigations** screen shows you all Mitigating Activities and Mitigation Plans that have been submitted. Below is a summary of the Mitigation process.



Submitting Mitigation



Mitigation Process Summary



Submitting Mitigation

☰
Mitigation Management ▼

Align For Entities ▼

🔍 My Draft Mitigations
🔍 My Active Mitigations
🔍 Consolidated Mitigations
🔍 Completed Mitigations

NCR00170 Editor 1 Benton County Wind Farm, LLC ↻

MY DRAFT MITIGATIONS

	TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	START DATE
➡	Mitigating Activities	2020-00788	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-008-5	R3.	RF-US	03/02/2020
	Mitigating Activities	2020-00790	RF	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	RF-US	09/28/2020
	Mitigating Activities	2021-00002	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	RF-US	10/05/2020
	Mitigating Activities	2021-00103	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	RF-US	02/23/2021
	Mitigating Activities	2021-00104	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/23/2021
	Mitigating Activities	2021-00203	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	RF-US	03/15/2021
	Mitigating Activities	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/20/2021
	Mitigating Activities	2021-00207	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	03/01/2021

⏪ ⏩ Page 1 of 1 ⏴ ⏵ 🔄

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```

graph TD
    Mitigation[Mitigation] --> CEA[CEA Processing]
    CEA --> NERC[NERC Processing (Mit Plan Only)]
    NERC --> Active[Active]
    Active --> Verification[Verification]
    RFIS[RFIS] --> CEA
    
```

RELATED DRAFT MITIGATION MILESTONES

	TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE
➡	Remediating Action	2021-00014 2021-000032	Revocation of access	01/11/2021
	Preventative Control	2021-00014 2021-000033	Update revocation process	01/22/2021
	Remediating Action	2021-00050 2021-000058	tes	02/05/2021
	Preventative Control	2021-00050 2021-000059	test	02/12/2021

⏪ ⏩ Page 1 of 1 ⏴ ⏵ 🔄



Submitting Mitigation

Mitigation Management Align For Entities

2021-00206

General Information

Type Mitigating Activities **Related PNC** 2021-00206 **CEA** RF

Registration NCR00170 - Benton County Wind Farm, LLC in RF

Applicable Requirement CIP-004-6 R5. **Registered Entity Contact** Please provide a point of contact for this mitigation.

Applicable Part(s) CIP-004-6 R5.3.; CIP-004-6 R5.1.

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

Applicable Reliability Function(s) GOP; GO

Region-Jurisdiction(s) in which the Potential Noncompliance occurred RF-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						

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

Page 0 of 0



Submitting Mitigation

Mitigation Management Align For Entities

2021-00206

General Information

Type	Mitigating Activities	Related PNC	2021-00206	CEA	RF
Registration	NCR00170 - Benton County Wind Farm, LLC in RF				
Applicable Requirement	CIP-004-6 R5.				
Registered Entity Contact	Please provide a point of contact for this mitigation.				
Applicable Part(s)	CIP-004-6 R5.3.; CIP-004-6 R5.1.				
Applicable Reliability Function(s)	GOP; GO				
Region-Jurisdiction(s) in which the Potential Noncompliance Occurred	RF-US				
Root Cause	Not available; PNC Review not yet complete.				
Interim Risk Reduction	<input type="text"/>				

Registered Entity Contact Table: This table is empty.

Mitigation Milestones

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

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

Page 0 of 0



Submitting Mitigation

Mitigation Management Align For Entities

2021-00206

General Information

Type	Mitigating Activities	Related PNC	2021-00206	CEA	RF
Registration	NCR00170 - Benton County Wind Farm, LLC in RF				
Applicable Requirement	CIP-004-6 R5.	Registered Entity Contact	Please provide a point of contact for this mitigation.		
Applicable Part(s)	CIP-004-6 R5.3.; CIP-004-6 R5.1.	<input type="checkbox"/> FIRST NAME LAST NAME			
Applicable Reliability Function(s)	GOP; GO	This table is empty			
Region-Jurisdiction(s) in which the Potential Noncompliance occurred	RF-US				
Root Cause	Not available; PNC Review not yet complete.				
Interim Risk Reduction	<p>Paragraph Helvetica ... 14px B I U Timestamp</p> <p>While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates.</p>				

Mitigation Milestones

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

[Save and Action](#) [Save](#) [Close](#)

Page 0 of 0



Submitting Mitigation

Mitigation Management Align For Entities

2021-00206

Applicable Reliability Function(s) GOP; GO

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

Root Cause Not available; PNC Review not yet complete.

Interim Risk Reduction

Paragraph Helvetica ... 14px

While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates|

Mitigation Milestones

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 No Action

2021-00206 FORM-RE-M2-Edit

Save and Action Save Close

Page 0 of 0

Submitting Mitigation

Mitigation Management Align For Entities

Milestone

Milestone Information

Type of Milestone Task

Milestone Name

Description of action

Planned Completion Date

Actual Completion Date

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 save this Milestone and its parent Mitigation.

Evidence Comments

Update **Close**

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Submitting Mitigation

Mitigation Management

Align For Entities

Milestone

Milestone Information

Type of Milestone Task *

Milestone Name

Description of action

Planned Completion Date
Actual Completion Date

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 save this Milestone and its parent Mitigation.

Evidence Comments

Page 0 of 0



Submitting Mitigation

Mitigation Management Align For Entities

MY DRAFT

Milestone

Milestone Information

Type of Milestone Task [?] Remediating Action

Milestone Name [?] Revoked access for affected individuals

Description of action [?] All access was revoked for the two individuals affected by this issue.

Planned Completion Date [?] 03/15/2021

Actual Completion Date [?]

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 save this Milestone and its parent Mitigation.

Evidence Comments

Update Close

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Submitting Mitigation

Mitigation Management Align For Entities

2021-00206

Applicable Part(s) CR-004-0 R0.0., CR-004-0 R0.1.

Applicable Reliability Function(s) GOP; GO

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

Root Cause Not available; PNC Review not yet complete.

Interim Risk Reduction ? While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates.

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
<input type="checkbox"/>	Remediating Action	Revoked access for affected individuals	03/15/2021		

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

2021-00206 FORM RE-M2-Edit

Save and Action Save Close

Page 0 of 0



Submitting Mitigation

Mitigation Management

Align For Entities

Milestone

Milestone Information

Type of Milestone Task * Preventative Control

Milestone Name Revised process for creating access revocation requests

Description of action Process for creating access revocation requests was revised to ensure that if the due date would normally fall on a non-business day, the due date is automatically populated as the preceding business day.

Planned Completion Date * 06/30/2021

Actual Completion Date

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 save this Milestone and its parent Mitigation.

Evidence Comments

Update Close

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Submitting Mitigation

Mitigation Management
Align For Entities

2021-00206
X

Applicable Function(s) CIP-004-0 R0.0, CIP-004-0 R0.1

Applicable Reliability Function(s) GOP; GO

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

Root Cause Not available; PNC Review not yet complete.

Interim Risk Reduction ⓘ
 While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates.

Mitigation Milestones

	MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
+	<input type="checkbox"/>	Remediating Action	Revoked access for affected individuals	03/15/2021		
↻	<input type="checkbox"/>	Preventative Control	Revised process for creating access revocation requests	06/30/2021		

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 No Action

2021-00206 FORM-RE-M2-Edit

Save and Action
Save
Close

Page 0 of 0



Submitting Mitigation

Mitigation Management Align For Entities

2021-00206

Applicable Reliability Function(s) GOP; GO

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

Root Cause Not available; PNC Review not yet complete.

Interim Risk Reduction While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates.

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
<input type="checkbox"/> MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		
<input type="checkbox"/> MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		

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 No Action

No Action

-- None --

No Action

Submit for CEA Review

Save and Action Save Close

Submitting Mitigation

Mitigation Management

2021-00206

Applicable Reliability Function(s) GOP; GO

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

Root Cause Not available; PNC Review not yet complete.

Interim Risk Reduction While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates.

This table is empty

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
<input type="checkbox"/> MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		
<input type="checkbox"/> MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		

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

2021-00206 FORM-RE-M2-Edit

Save and Action Save Close



Submitting Mitigation

Mitigation Management Align For Entities

My Draft Mitigations **My Active Mitigations** Consolidated Mitigations Completed Mitigations

NCR00170 Editor 1 Benton County Wind Farm, LLC

MY DRAFT MITIGATIONS

✓ Action succeeded

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	START DATE
Mitigating Activities	2020-00788	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-008-5	R3.	RF-US	03/02/2020
Mitigating Activities	2020-00790	RF	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	RF-US	09/28/2020
Mitigating Activities	2021-00002	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	RF-US	10/05/2020
Mitigating Activities	2021-00103	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	RF-US	02/23/2021
Mitigating Activities	2021-00104	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/23/2021
Mitigating Activities	2021-00203	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	RF-US	03/15/2021
Mitigating Activities	2021-00207	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	03/01/2021

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RELATED DRAFT MITIGATION MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE
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Page 0 of 0

INSTRUCTIONS

These are your Mitigation Management Screens. The **Draft Mitigations** screen shows you all your draft Mitigating Activities, as well as those that have been returned to you for more work or converted to a Mitigation Plan (both indicated with a yellow triangle). The **Active Mitigations** screen shows you all Mitigating Activities and Mitigation Plans that have been submitted. Below is a summary of the Mitigation process.

```
graph TD; Mitigation[Mitigation] --> CEA[CEA Processing]; RFIS[RFIS] --> CEA; CEA --> NERC[NERC Processing (Mit Plan Only)]; NERC --> Active[Active]; Active --> Verification[Verification]; Active -- Mitigating Activities Only --> CEA;
```



Submitting Mitigation

Mitigation Management
Align For Entities

My Draft Mitigations | My Active Mitigations | 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	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/22/2021		CIP-004-6	R5.	RF-US	02/20/2021	CEA Processing Due 04/22/2021
Mitigating Activities	2021-00166	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/12/2021		CIP-006-6	R1.	RF-US	03/08/2021	Active
Mitigating Activities	2021-00102	RF	NCR00170 - Benton County Wind Farm, LLC in RF	02/25/2021	02/25/2021	CIP-004-6	R5.	RF-US	02/23/2021	Active
Mitigation Plan	2021-00014	RF	NCR00170 - Benton County Wind Farm, LLC in RF	01/14/2021		CIP-004-6	R5.	RF-US	01/09/2021	NERC Processing Due 02/14/2021

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RELATED MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION
Remediating Action	2021-00014 2021-000032	Revocation of access	01/11/2021	01/11/2021	
Remediating Action	2021-00050 2021-000058	tes	02/05/2021	02/11/2021	
Preventative Control	2021-00050 2021-000059	test	02/12/2021	02/11/2021	
Corrective Control	2021-00102 2S21-00090	test	02/25/2021	02/25/2021	
Preventative Control	2021-00102 2S21-00091	test	02/25/2021	02/25/2021	
Preventative Control	2021-00014 2021-000033	Update revocation process	01/22/2021		+
Remediating Action	2021-00166 MS21-00171	test	03/26/2021		+

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ACTIVE REQUESTS FOR INFORMATION

DUE DATE	ID	COMMENT

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TRACKING MITIGATION


ALIGN



Tracking Mitigation


Mon 3/22/2021 11:06 PM
noreply@bwise.net

CEA has rejected a Mitigating Activities (2021-00206)

To  AlignR.1Testing@nerc.com

Phish Alert V2 + Get more apps

[WARNING: EXTERNAL EMAIL]: Please use CAUTION before replying or opening links/attachments. Please report any suspicious links/attachments or requests for sensitive information.

 Automatic email alert

Related Noncompliance: 2021-00206
Mitigation ID: 2021-00206

Subject: RF - Mitigating Activities Rejected Action Required

Upon review, RF has rejected the Mitigating Activities associated with 2021-00206 submitted on 2021-03-22.

Please see the "Comments from Region and NERC" section for information regarding reasons for rejection and expectations for submitting a revised Mitigating Activities.

RF requests that the entity submit a revised Mitigating Activities by 2021-04-05.

To access Align, go to the ERO portal, navigate to the Align landing page and click on the link to log in.


This e-mail has been generated automatically. Do not reply to this address.

Sincerely,



Tracking Mitigation

Assigned To Me



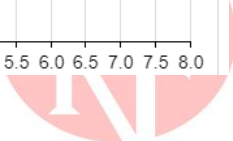
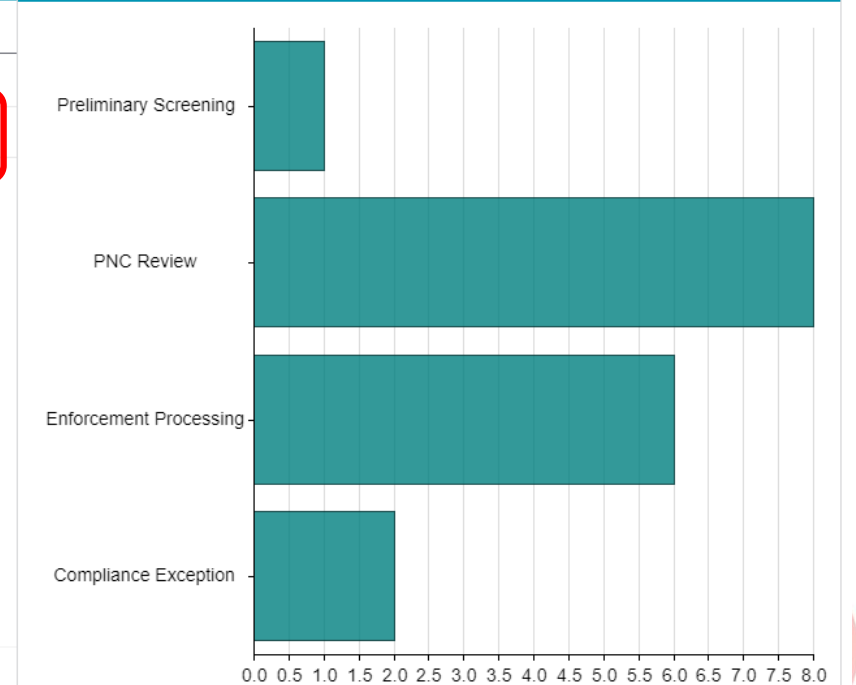
Welcome to Release 1 of the **Align** system! This is your **Dashboard** screen. Navigate the system by selecting activities above. You can create Self Reports and Self Logs from the **Compliance Monitoring** section. In the **Enforcement Processing** section, you see the status of Findings (both those you created and those created by your Regions). In the **Mitigation Management** section, you can edit and manage Mitigating Activities and Mitigation Plans.

NEWS AND UPDATES

MY TASKS

TYPE	UNIQUE ID	REGION OR LRE	STATUS	NCR	REGISTRATION	STANDARD	REQ	DUE DATE
Compliance Exception	2021-00102 235021-	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5	03/04/2021
Mitigating Activities	2021-00206	RF	Resubmit	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5	04/05/2021

STATUS OF MY FINDINGS



Tracking Mitigation

My Align ▼

- My Align
- Compliance Monitoring
- Enforcement Processing
- Mitigation Management**
- Reports

Align For Entities ▼

NCR00170 Editor 1 Benton County Wind Farm, LLC ↻

NEWS AND UPDATES

Welcome to Release 1 of the **Align** system! This is your **Dashboard** screen. Navigate the system by selecting activities above. You can create Self Reports and Self Logs from the **Compliance Monitoring** section. In the **Enforcement Processing** section, you see the status of Findings (both those you created and those created by your Regions). In the **Mitigation Management** section, you can edit and manage Mitigating Activities and Mitigation Plans.

MY TASKS

TYPE	UNIQUE ID	REGION OR LRE	STATUS	NCR	REGISTRATION	STANDARD	REQ	DUE DATE
Compliance Exception Letter	2021-00102 235021-	RF	Awaiting your Response	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5.	03/04/2021
Mitigating Activities	2021-00206	RF	Resubmit	NCR00170	Benton County Wind Farm, LLC	CIP-004-6	R5.	04/05/2021

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Tracking Mitigation

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Mitigation Management ▼

Align For Entities ▼

🔍 My Draft Mitigations
🔍 My Active Mitigations
🔍 Consolidated Mitigations
🔍 Completed Mitigations

NCR00170 Editor 1 Benton County Wind Farm, LLC ↻

MY DRAFT MITIGATIONS

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	START DATE
Mitigating Activities	2020-00788	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-008-5	R3.	RF-US	03/02/2020
Mitigating Activities	2020-00790	RF	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	RF-US	09/28/2020
Mitigating Activities	2021-00002	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	RF-US	10/05/2020
Mitigating Activities	2021-00103	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	RF-US	02/23/2021
Mitigating Activities	2021-00104	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/23/2021
Mitigating Activities ⚠️	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/20/2021
Mitigating Activities	2021-00207	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	03/01/2021

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INSTRUCTIONS

These are your Mitigation Management Screens. The **Draft Mitigations** screen shows you all your draft Mitigating Activities, as well as those that have been returned to you for more work or converted to a Mitigation Plan (both indicated with a yellow triangle). The **Active Mitigations** screen shows you all Mitigating Activities and Mitigation Plans that have been submitted. Below is a summary of the Mitigation process.

```

graph TD
    Mitigation((Mitigation)) --> CEA[CEA Processing]
    CEA --> NERC[NERC Processing (Mit Plan Only)]
    NERC --> Active[Active]
    Active --> Verification[Verification]
    subgraph "Mitigating Activities Only"
        direction TB
        MAO1[ ]
        MAO2[ ]
    end
    MAO1 --> CEA
    MAO2 --> NERC
    subgraph "RHS"
        direction TB
        RHS[ ]
    end
    RHS --> CEA
            
```

RELATED DRAFT MITIGATION MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE
Remediating Action	2021-00014 <small>2021-000032</small>	Revocation of access	01/11/2021
Preventative Control	2021-00014 <small>2021-000033</small>	Update revocation process	01/22/2021
Remediating Action	2021-00050 <small>2021-000058</small>	tes	02/05/2021
Preventative Control	2021-00050 <small>2021-000059</small>	test	02/12/2021

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Tracking Mitigation

☰
Mitigation Management ▼

Align For Entities ▼

🔍 My Draft Mitigations
🔍 My Active Mitigations
🔍 Consolidated Mitigations
🔍 Completed Mitigations

NCR00170 Editor 1 Benton County Wind Farm, LLC ↻

MY DRAFT MITIGATIONS

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	START DATE
Mitigating Activities	2020-00788	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-008-5	R3.	RF-US	03/02/2020
Mitigating Activities	2020-00790	RF	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	RF-US	09/28/2020
Mitigating Activities	2021-00002	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	RF-US	10/05/2020
Mitigating Activities	2021-00103	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	RF-US	02/23/2021
Mitigating Activities	2021-00104	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/23/2021
Mitigating Activities	2021-00203	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	RF-US	03/15/2021
Mitigating Activities ⚠️	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/20/2021
Mitigating Activities	Please address identified issues and Resubmit.		NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	03/01/2021

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INSTRUCTIONS

These are your Mitigation Management Screens. The **Draft Mitigations** screen shows you all your draft Mitigating Activities, as well as those that have been returned to you for more work or converted to a Mitigation Plan (both indicated with a yellow triangle). The **Active Mitigations** screen shows you all Mitigating Activities and Mitigation Plans that have been submitted. Below is a summary of the Mitigation process.

```

graph TD
    Mitigation[Mitigation] --> CEA[CEA Processing]
    RFI[RFI's] --> CEA
    CEA --> NERC[NERC Processing (Mit Plan Only)]
    MA[Mitigating Activities Only] --> NERC
    NERC --> Active[Active]
    Active --> Verification[Verification]
            
```

RELATED DRAFT MITIGATION MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE
Remediating Action	2021-00014 <small>2021-000032</small>	Revocation of access	01/11/2021
Preventative Control	2021-00014 <small>2021-000033</small>	Update revocation process	01/22/2021
Remediating Action	2021-00050 <small>2021-000058</small>	tes	02/05/2021
Preventative Control	2021-00050 <small>2021-000059</small>	test	02/12/2021

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Tracking Mitigation

Mitigation Management Align For Entities

2021-00206

General Information

Type	Mitigating Activities	Related PNC	2021-00206	CEA	RF
Registration	NCR00170 - Benton County Wind Farm, LLC in RF				
Applicable Requirement	CIP-004-6 R5.	Registered Entity Contact	Please provide a point of contact for this mitigation.		
Applicable Part(s)	CIP-004-6 R5.3.; CIP-004-6 R5.1.	<input type="checkbox"/>	FIRST NAME	LAST NAME	
Applicable Reliability Function(s)	GOP; GO	This table is empty			
Region-Jurisdiction(s) in which the Potential Noncompliance occurred	RF-US				

Review Results and Due Date

Region Review Results	Resubmit
CEA Comments	Please include milestone explaining how affected staff will be made aware of, and trained on, process updates
New Submission Due Date	April 5, 2021

Root Cause and Interim Risk Reduction

Root Cause	Not available; PNC Review not yet complete.
Interim Risk Reduction	While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates.

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

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Tracking Mitigation

Mitigation Management Align For Entities

2021-00206

Interim Risk Reduction While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates.

Mitigation Milestones

<input type="checkbox"/>	MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
<input type="checkbox"/>	MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		
<input type="checkbox"/>	MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		

Requests for Information

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	RESPONSE DUE BY
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.

Action

2021-00206 FORM.RE-M2-Resubmit

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

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Tracking Mitigation

Mitigation Management

Milestone

Milestone Information

Type of Milestone Task [?] Preventative Control

Milestone Name Milestone Name Train affected staff on process update

Description of action Description of action All affected staff will be trained on process updates prior to implementation.

Planned Completion Date 06/30/2021

Actual Completion Date

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 save this Milestone and its parent Mitigation.

Evidence Comments

FORM: create-new

Update Close

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Tracking Mitigation

Mitigation Management Align For Entities

2021-00206

Interim Risk Reduction While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates.

Mitigation Milestones

<input type="checkbox"/>	MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
<input type="checkbox"/>	MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		
<input type="checkbox"/>	MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		
<input type="checkbox"/>		Preventative Control	Train affected staff on process update	06/30/2021		

Requests for Information

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	RESPONSE DUE BY
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.

Action

2021-00206 FORM-RE-M2-Resubmit

- None --
- No Action
- Submit for CEA Review

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Tracking Mitigation

Mitigation Management Align For Entities

2021-00206

Interim Risk Reduction While mitigation is being completed, we are completing weekly reviews of all revocation requests to ensure that they are created with correct due dates.

Mitigation Milestones

	<input type="checkbox"/>	MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
+	<input type="checkbox"/>	MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		
↻	<input type="checkbox"/>	MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		
	<input type="checkbox"/>		Preventative Control	Train affected staff on process update	06/30/2021		

Requests for Information

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	RESPONSE DUE BY
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.

Action

2021-00206 FORM:RE-M2-Resubmit

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

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Tracking Mitigation

Mitigation Management
Align For Entities

My Draft Mitigations | My Active Mitigations | Consolidated Mitigations | Completed Mitigations

MY DRAFT MITIGATIONS

INSTRUCTIONS

✓ Action succeeded

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	START DATE
Mitigating Activities	2020-00788	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-008-5	R3.	RF-US	03/02/2020
Mitigating Activities	2020-00790	RF	NCR00170 - Benton County Wind Farm, LLC in RF	TOP-001-4	R3.	RF-US	09/28/2020
Mitigating Activities	2021-00002	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	RF-US	10/05/2020
Mitigating Activities	2021-00103	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	RF-US	02/23/2021
Mitigating Activities	2021-00104	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/23/2021
Mitigating Activities	2021-00203	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	RF-US	03/15/2021
Mitigating Activities	2021-00207	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	03/01/2021

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RELATED DRAFT MITIGATION MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE
Remediating Action	2021-00206 MS21-00217	Revoked access for affected individuals	03/15/2021
Preventative Control	2021-00206 MS21-00218	Revised process for creating access revocation requests	06/30/2021

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These are your Mitigation Management Screens. The **Draft Mitigations** screen shows you all your draft Mitigating Activities, as well as those that have been returned to you for more work or converted to a Mitigation Plan (both indicated with a yellow triangle). The **Active Mitigations** screen shows you all Mitigating Activities and Mitigation Plans that have been submitted. Below is a summary of the Mitigation process.

```

graph TD
    Mitigation[Mitigation] --> CEA[CEA Processing]
    CEA --> NERC[NERC Processing (Mit Plan Only)]
    NERC --> Active[Active]
    Active --> Verification[Verification]
    RFs[RFs] -.-> CEA
    Mitigating[Mitigating Activities Only] -.-> NERC
    
```



Tracking Mitigation

Mitigation Management ▼

Align For Entities ▼

My Draft Mitigations
My Active Mitigations
Consolidated Mitigations
Completed Mitigations

NCR00170 Editor 1 Benton County Wind Farm, LLC ↻

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	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/22/2021		CIP-004-6	R5.	RF-US	02/20/2021	CEA Processing Due 04/22/2021
Mitigating Activities	2021-00166	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/12/2021		CIP-006-6	R1.	RF-US	03/08/2021	Active
Mitigating Activities	2021-00102	RF	NCR00170 - Benton County Wind Farm, LLC in RF	02/25/2021	02/25/2021	CIP-004-6	R5.	RF-US	02/23/2021	Active
Mitigation Plan	2021-00014	RF	NCR00170 - Benton County Wind Farm, LLC in RF	01/14/2021		CIP-004-6	R5.	RF-US	01/09/2021	NERC Processing Due 02/14/2021

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RELATED MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION
Remediating Action	2021-00014 2021-000032	Revocation of access	01/11/2021	01/11/2021	
Remediating Action	2021-00050 2021-000058	tes	02/05/2021	02/11/2021	
Preventative Control	2021-00050 2021-000059	test	02/12/2021	02/11/2021	
Corrective Control	2021-00102 2S21-00090	test	02/25/2021	02/25/2021	
Preventative Control	2021-00102 2S21-00091	test	02/25/2021	02/25/2021	
Preventative Control	2021-00014 2021-000033	Update revocation process	01/22/2021		+
Remediating Action	2021-00166 MS21-00171	test	03/26/2021		+

ACTIVE REQUESTS FOR INFORMATION

DUE DATE	ID	COMMENT

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⏪ ⏩
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⏪ ⏩ ↻



Tracking Mitigation

Mon 3/22/2021 11:18 PM
noreply@bwise.net
Mitigating Activities Acceptance (2021-00206)

To: AlignR1Testing@nerc.com

Phish Alert V2 + Get more apps

[WARNING: EXTERNAL EMAIL]: Please use CAUTION before replying or opening links/attachments. Please report any suspicious links/attachments or requests for sensitive information.

ALIGN Automatic email alert

Related Noncompliance: 2021-00206
Mitigation ID: 2021-00206

Subject: RF- Mitigating Activities Acceptance - For Your Awareness Only

RF received the mitigating activities associated with 2021-00206 submitted on 2021-03-22.

Upon review, RF determined the mitigating activities submitted are sufficient and accepted. The entity is not expected to submit a formal Mitigation Plan.

To access Align, go to the ERO portal, navigate to the Align landing page and click on the link to log in.



Tracking Mitigation

Mitigation Management Align For Entities

My Draft Mitigations | My Active Mitigations | Consolidated Mitigations | Completed Mitigations

NCR00170 Editor 1 Benton County Wind Farm, LLC

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	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/22/2021		CIP-004-6	R5.	RF-US	02/20/2021	Active
Mitigating Activities	2021-00166	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/12/2021		CIP-006-6	R1.	RF-US	03/08/2021	Active
Mitigating Activities	2021-00102	RF	NCR00170 - Benton County Wind Farm, LLC in RF	02/25/2021	02/25/2021	CIP-004-6	R5.	RF-US	02/23/2021	Active
Mitigation Plan	2021-00014	RF	NCR00170 - Benton County Wind Farm, LLC in RF	01/14/2021		CIP-004-6	R5.	RF-US	01/09/2021	NERC Processing Due 02/14/2021

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RELATED MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION
Remediating Action	2021-00014 2021-000032	Revocation of access	01/11/2021	01/11/2021	
Remediating Action	2021-00050 2021-000058	tes	02/05/2021	02/11/2021	
Preventative Control	2021-00050 2021-000059	test	02/12/2021	02/11/2021	
Corrective Control	2021-00102 2S21-00090	tet	02/25/2021	02/25/2021	
Preventative Control	2021-00102 2S21-00091	test	02/25/2021	02/25/2021	
Preventative Control	2021-00014 2021-000033	Update revocation process	01/22/2021		+
Remediating Action	2021-00166 MS21-00171	test	03/26/2021		+

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ACTIVE REQUESTS FOR INFORMATION

DUE DATE	ID	COMMENT

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UPDATING MITIGATION

ALIGN



Updating Mitigation

Mitigation Management Align For Entities

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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	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/22/2021		CIP-004-6	R5.	RF-US	02/20/2021	Active
	Mitigating Activities	2021-00166	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/12/2021		CIP-006-6	R1.	RF-US	03/08/2021	Active
	Mitigating Activities	2021-00102	RF	NCR00170 - Benton County Wind Farm, LLC in RF	02/25/2021	02/25/2021	CIP-004-6	R5.	RF-US	02/23/2021	Active
	Mitigation Plan	2021-00014	RF	NCR00170 - Benton County Wind Farm, LLC in RF	01/14/2021		CIP-004-6	R5.	RF-US	01/09/2021	NERC Processing Due 02/14/2021

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RELATED MILESTONES

	TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION
↗	Remediating Action	2021-00206 MS21-00217	Revoked access for affected individuals	03/15/2021		+
	Preventative Control	2021-00206 MS21-00218	Revised process for creating access revocation requests	06/30/2021		+
	Preventative Control	2021-00206 MS21-00219	Train affected staff on process update	06/30/2021		+

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ACTIVE REQUESTS FOR INFORMATION

DUE DATE	ID	COMMENT
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Updating Mitigation

Create Milestone Extension Request

Milestone Extension Request

Mitigation	2021-00206	Proposed New Planned Completion	<input type="text"/>
Related Milestone	2021-00206 MS21-00219	Explanation	<input type="text"/>
Milestone Name	Train affected staff on process update		
Compliance Enforcement Authority	RF		

FORM: Create



Updating Mitigation

Create Milestone Extension Request

Milestone Extension Request

Mitigation	2021-00206	Proposed New Planned Completion	07/14/2021
Related Milestone	2021-00206 MS21-00219	Explanation	<p>Due to vacation schedules, it will take an additional two weeks to ensure all affected staff receive the required training.</p>
Milestone Name	Train affected staff on process update		
Compliance Enforcement Authority	RF		

FORM: Create

Update Close



Updating Mitigation

Mitigation Management
Align For Entities

My Draft Mitigations | My Active Mitigations | Consolidated Mitigations | Completed Mitigations
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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	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/22/2021		CIP-004-6	R5.	RF-US	02/20/2021	Active
Mitigating Activities	2021-00166	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/12/2021		CIP-006-6	R1.	RF-US	03/08/2021	Active
Mitigating Activities	2021-00102	RF	NCR00170 - Benton County Wind Farm, LLC in RF	02/25/2021	02/25/2021	CIP-004-6	R5.	RF-US	02/23/2021	Active
Mitigation Plan	2021-00014	RF	NCR00170 - Benton County Wind Farm, LLC in RF	01/14/2021		CIP-004-6	R5.	RF-US	01/09/2021	NERC Processing Due 02/14/2021

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RELATED MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION
Remediating Action	2021-00206 MS21-00217	Revoked access for affected individuals	03/15/2021		+
Preventative Control	2021-00206 MS21-00218	Revised process for creating access revocation requests	06/30/2021		+
Preventative Control	2021-00206 MS21-00219	Train affected staff on process update	06/30/2021		+

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ACTIVE REQUESTS FOR INFORMATION


DUE DATE	ID	COMMENT

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Updating Mitigation

 Tue 3/23/2021 12:13 AM
noreply@bwise.net
Mitigation Milestone date changed (2021-00206)

To  AlignR 1Testing@nerc.com

Phish Alert V2 + Get more apps

[WARNING: EXTERNAL EMAIL]: Please use CAUTION before replying or opening links/attachments. Please report any suspicious links/attachments or requests for sensitive information.

 **Automatic email alert**

Related Noncompliance: 2021-00206
Mitigation ID: 2021-00206
Milestone Subject to Request: Train affected staff on process update

Original Completion Date: 2021-06-30
Proposed Completion Date: 2021-07-14

On 2021-03-22, the entity requested an extension of Milestone Train affected staff on process update associated with 2021-00206 to 2021-07-14. This notice is to inform you that RF has accepted the requested extension. Therefore, the expected completion date of Milestone Train affected staff on process update is 2021-07-14.

This e-mail has been generated automatically. Do not reply to this address.



Updating Mitigation

Mitigation Management Align For Entities

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NCR00170 Editor 1 Benton County Wind Farm, LLC

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	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/22/2021		CIP-004-6	R5.	RF-US	02/20/2021	Active
Mitigating Activities	2021-00166	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/12/2021		CIP-006-6	R1.	RF-US	03/08/2021	Active
Mitigating Activities	2021-00102	RF	NCR00170 - Benton County Wind Farm, LLC in RF	02/25/2021	02/25/2021	CIP-004-6	R5.	RF-US	02/23/2021	Active
Mitigation Plan	2021-00014	RF	NCR00170 - Benton County Wind Farm, LLC in RF	01/14/2021		CIP-004-6	R5.	RF-US	01/09/2021	NERC Processing Due 02/14/2021

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RELATED MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION
Remediating Action	2021-00206 MS21-00217	Revoked access for affected individuals	03/15/2021		+
Preventative Control	2021-00206 MS21-00218	Revised process for creating access revocation requests	06/30/2021		+
Preventative Control	2021-00206 MS21-00219	Train affected staff on process update	07/14/2021		+

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ACTIVE REQUESTS FOR INFORMATION

DUE DATE	ID	COMMENT

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Updating Mitigation

Mitigation Management 2021-00206

Align For Entities

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		
MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		
MS21-00219	Preventative Control	Train affected staff on process update	06/30/2021	07/14/2021	

Requests for Information

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	RESPONSE DUE BY
This table is empty			

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

Explanation

Action * No Action

2021-00206 FORM:RE-M2-Update

Save and Action Save Close

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SUBMITTING EVIDENCE OF MITIGATION COMPLETION

ALIGN



Submitting Evidence of Mitigation Completion

Mitigation Management Align For Entities

My Draft Mitigations My Active Mitigations Consolidated Mitigations Completed Mitigations

NCR00170 Editor 1 Benton County Wind Farm, LLC

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	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/22/2021		CIP-004-6	R5.	RF-US	02/20/2021	Active
Mitigating Activities	2021-00166	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/12/2021		CIP-006-6	R1.	RF-US	03/08/2021	Active
Mitigating Activities	2021-00102	RF	NCR00170 - Benton County Wind Farm, LLC in RF	02/25/2021	02/25/2021	CIP-004-6	R5.	RF-US	02/23/2021	Active
Mitigation Plan	2021-00014	RF	NCR00170 - Benton County Wind Farm, LLC in RF	01/14/2021		CIP-004-6	R5.	RF-US	01/09/2021	NERC Processing Due 02/14/2021

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RELATED MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION
Remediating Action	2021-00206 MS21-00217	Revoked access for affected individuals	03/15/2021		+
Preventative Control	2021-00206 MS21-00218	Revised process for creating access revocation requests	06/30/2021		+
Preventative Control	2021-00206 MS21-00219	Train affected staff on process update	07/14/2021		+

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ACTIVE REQUESTS FOR INFORMATION

DUE DATE	ID	COMMENT

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Submitting Evidence of Mitigation Completion

Mitigation Management Align For Entities

2021-00206

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		
MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		
MS21-00219	Preventative Control	Train affected staff on process update	06/30/2021	07/14/2021	

Requests for Information

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	RESPONSE DUE BY
This table is empty			

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

Explanation

Action *

2021-00206 FORM RE-M2-Update

Save and Action Save Close

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Submitting Evidence of Mitigation Completion

Mitigation Management

Align For Entities

2021-00206 | MS21-00217

Milestone Information

Type of Milestone Task	Remediating Action
Milestone Name	Revoked access for affected individuals
Description of Task	All access was revoked for the two individuals affected by this issue.
Planned Completion Date	March 15, 2021
Revised Completion Date	
Actual Completion Date	<input type="text"/>

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:

Evidence Comments

RF|NCR00170|VI2021-00206|VI2021-00206,MI2021-00206,MS21-00217|R5.1,5.3.,5.1.

MS21-00217 FORM: RegMISActEdit

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Submitting Evidence of Mitigation Completion

Mitigation Management

2021-00206 | MS21-00217

Milestone Information

Type of Milestone Task	Remediating Action
Milestone Name	Revoked access for affected individuals
Description of Task	All access was revoked for the two individuals affected by this issue.
Planned Completion Date	March 15, 2021
Revised Completion Date	
Actual Completion Date	03/15/2021

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:
RF|NCR00170|VI2021-00206|VI2021-00206,MI2021-00206,MS21-00217|R5.15.3.,5.1.

Evidence Comments

Paragraph | Helvetica ... | 14px | B | I | U | Timestamp

Evidence of completion uploaded to SEL using above reference string

MS21-00217 FORM: RegMIActEdit

Save Close

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Submitting Evidence of Mitigation Completion

Mitigation Management Align For Entities

2021-00206

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		03/15/2021
MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		
MS21-00219	Preventative Control	Train affected staff on process update	06/30/2021	07/14/2021	

Requests for Information

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	RESPONSE DUE BY
This table is empty			

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

Explanation

Action * No Action

2021-00206 FORM:RE-M2-Update

[Save and Action](#) [Save](#) [Close](#)

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Submitting Evidence of Mitigation Completion

Mitigation Management 2021-00206

Align For Entities

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		03/15/2021
MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		03/22/2021
MS21-00219	Preventative Control	Train affected staff on process update	06/30/2021	07/14/2021	03/22/2021

Requests for Information

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	RESPONSE DUE BY
This table is empty			

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

Explanation

Action * No Action

2021-00206 FORM RE-M2-Update

Save and Action Save Close

Page 1 of 1 Page 0 of 0



Submitting Evidence of Mitigation Completion

Mitigation Management Align For Entities

2021-00206

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		03/15/2021
MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		03/22/2021
MS21-00219	Preventative Control	Train affected staff on process update	06/30/2021	07/14/2021	03/22/2021

Requests for Information

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	RESPONSE DUE BY
This table is empty			

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

Explanation ⓘ

Action *

2021-00206 FORM:RE-M2-Update

[Save and Action](#) [Save](#) [Close](#)

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Submitting Evidence of Mitigation Completion

Mitigation Management 2021-00206

Align For Entities

Mitigation Milestones

MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
MS21-00217	Remediating Action	Revoked access for affected individuals	03/15/2021		03/15/2021
MS21-00218	Preventative Control	Revised process for creating access revocation requests	06/30/2021		03/22/2021
MS21-00219	Preventative Control	Train affected staff on process update	06/30/2021	07/14/2021	03/22/2021

Requests for Information

RFI ID	REQUESTOR CONTACT	RESPONDENT CONTACT	RESPONSE DUE BY
This table is empty			

Has the scope of this issue expanded as a result of these mitigation steps?
No

Explanation

Action *
No Action
Submit for CEA Verification

2021-00206 FORM-RE-M2-Update

Save and Action Save Close

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Submitting Evidence of Mitigation Completion

Mitigation Management
Align For Entities

My Draft Mitigations | My Active Mitigations | Consolidated Mitigations | Completed Mitigations
NCR00170 Editor 1 Benton County Wind Farm, LLC

MY MITIGATING ACTIVITIES AND MITIGATION PLANS

✓ Action succeeded

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	DATE SUBMITTED	COMPLETION DATE	STANDARD	REQ	REGION AND JURISDICTION	START DATE	STATUS
Mitigating Activities	2021-00166	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/12/2021		CIP-006-6	R1.	RF-US	03/08/2021	Active
Mitigating Activities	2021-00102	RF	NCR00170 - Benton County Wind Farm, LLC in RF	02/25/2021	02/25/2021	CIP-004-6	R5.	RF-US	02/23/2021	Active
Mitigation Plan	2021-00014	RF	NCR00170 - Benton County Wind Farm, LLC in RF	01/14/2021		CIP-004-6	R5.	RF-US	01/09/2021	NERC Processing Due 02/14/2021

Page 1 of 1

RELATED MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION
Remediating Action	2021-00014 2021-000032	Revocation of access	01/11/2021	01/11/2021	
Preventative Control	2021-00014 2021-000033	Update revocation process	01/22/2021		+

Page 1 of 1

ACTIVE REQUESTS FOR INFORMATION

DUE DATE	ID	COMMENT

Page 0 of 0



TRACKING COMPLETED MITIGATION

ALIGN



Tracking Completed Mitigation

☰ Mitigation Management ▼

Align For Entities ▼

My Align
Mitigations
Consolidated Mitigations
Completed Mitigations

NCR00170 Editor 1 Benton County Wind Farm, LLC ↻

Compliance Monitoring

Enforcement Processing

Mitigation Management

Reports

MITIGATION PLANS

	REGION OR LRE	REGISTRATION	DATE SUBMITTED	COMPLETION DATE	STANDARD	REQ	REGION AND JURISDICTION	START DATE	STATUS
Mitigating Activities	RF	NCR00170 - Benton County Wind Farm, LLC in RF	03/12/2021		CIP-006-6	R1.	RF-US	03/08/2021	Active
Mitigation Plan	RF	NCR00170 - Benton County Wind Farm, LLC in RF	02/25/2021	02/25/2021	CIP-004-6	R5.	RF-US	02/23/2021	Active
Mitigation Plan	RF	NCR00170 - Benton County Wind Farm, LLC in RF	01/14/2021		CIP-004-6	R5.	RF-US	01/09/2021	NERC Processing Due 02/14/2021

⏪ ⏩ Page of 1 ⏪ ⏩ ↻

RELATED MILESTONES

TYPE OF MILESTONE	UNIQUE ID	NAME	DUE DATE	COMPLETION DATE	REQUEST EXTENSION
Remediating Action	2021-00014 2021-000032	Revocation of access	01/11/2021	01/11/2021	
Remediating Action	2021-00050 2021-000058	tes	02/05/2021	02/11/2021	
Preventative Control	2021-00050 2021-000059	test	02/12/2021	02/11/2021	
Corrective Control	2021-00102 2S21-00090	tet	02/25/2021	02/25/2021	
Preventative Control	2021-00102 2S21-00091	test	02/25/2021	02/25/2021	
Remediating Action	2021-00206 MS21-00217	Revoked access for affected individuals	03/15/2021	03/15/2021	
Preventative Control	2021-00206 MS21-00218	Revised process for creating access revocation requests	06/30/2021	03/22/2021	

ACTIVE REQUESTS FOR INFORMATION

DUE DATE	ID	COMMENT

⏪ ⏩ Page of 1 ⏪ ⏩ ↻

⏪ ⏩ Page of 0 ⏪ ⏩ ↻



Tracking Completed Mitigation

Enforcement Processing Align For Entities

My Open Findings My Closed Findings NCR00170 Editor 1 Benton County Wind Farm, LLC

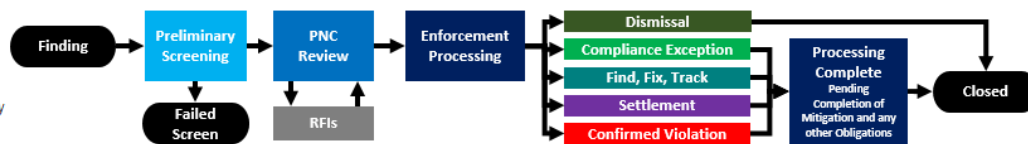
MY OPEN FINDINGS

MONITORING METHOD	UNIQUE ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	FINDING STATUS	SEND UPDATE	MITIGATION
Audit	2021-00207	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	03/01/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2021-00206	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/20/2021	PNC Review	+	Mitigating Activities In Verification
Self-Report	2021-00203	RF	03/17/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	03/15/2021	Preliminary Screening	+	Mitigating Activities Draft
Self-Report	2021-00166	RF	03/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	03/08/2021	PNC Review	+	Mitigating Activities Active
Self-Report	2021-00104	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2021-00103	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Log	2021-00102	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Active
Self-Report	2021-00055	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/05/2021	Enforcement Processing	+	Mitigating Activities Complete
Self-Report	2021-00050	RF	02/04/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	02/01/2021	PNC Review	+	Mitigating Activities In Verification
Self-Report	2021-00015	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R1.	01/13/2021	PNC Review	+	Mitigating Activities Complete
Self-Report	2021-00014	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	01/09/2021	PNC Review	+	Mitigation Plan NERC Processing
Self-Report	2021-00002	RF	01/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	10/05/2020	Enforcement Processing	+	Mitigating Activities Draft

Page 1 of 1

INSTRUCTIONS


This is your Findings dashboard. From here, you can see the status of all the potential noncompliances associated with your Registration(s). You can View those findings, and you can send a Finding Update to provide your Region with more information. You can also access your Mitigation from this screen. A summary of the process a Finding goes through is shown on the right.




Finding Process Summary




Tracking Completed Mitigation

 Tue 3/23/2021 12:30 AM
noreply@bwise.net
Completed Mitigation Verification (2021-00206)

To  AlignR1Testing@nerc.com

Phish Alert V2 + Get more apps

[WARNING: EXTERNAL EMAIL]: Please use CAUTION before replying or opening links/attachments. Please report any suspicious links/attachments or requests for sensitive information.

 **Automatic email alert**

Related Noncompliance: 2021-00206
Mitigation ID: 2021-00206

RF received the completion of Mitigating Activities associated with 2021-00206 submitted on 2021-03-23

After a thorough review, RF has verified completion of the Mitigating Activities.

To access Align, go to the ERO portal, navigate to the Align landing page and click on the link to log in.

This e-mail has been generated automatically. Do not reply to this address.

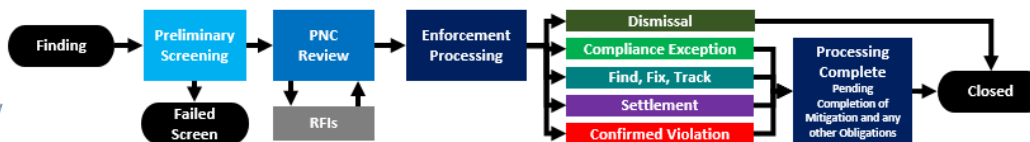


Tracking Completed Mitigation

Enforcement Processing											Align For Entities
Findings											NCR00170 Editor 1 Benton County Wind Farm, LLC
MY O		REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	FINDING STATUS	SEND UPDATE	MITIGATION	
		RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	03/01/2021	Enforcement Processing	+	Mitigating Activities Draft	
Self-Report	2021-00206	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/20/2021	PNC Review	+	Mitigating Activities Complete	
Self-Report	2021-00203	RF	03/17/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	03/15/2021	Preliminary Screening	+	Mitigating Activities Draft	
Self-Report	2021-00166	RF	03/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	03/08/2021	PNC Review	+	Mitigating Activities Active	
Self-Report	2021-00104	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft	
Self-Report	2021-00103	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft	
Self-Log	2021-00102	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Active	
Self-Report	2021-00055	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/05/2021	Enforcement Processing	+	Mitigating Activities Complete	
Self-Report	2021-00050	RF	02/04/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	02/01/2021	PNC Review	+	Mitigating Activities In Verification	
Self-Report	2021-00015	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R1.	01/13/2021	PNC Review	+	Mitigating Activities Complete	
Self-Report	2021-00014	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	01/09/2021	PNC Review	+	Mitigation Plan NERC Processing	
Self-Report	2021-00002	RF	01/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	10/05/2020	Enforcement Processing	+	Mitigating Activities Draft	

INSTRUCTIONS

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Findings Process Summary



Tracking Completed Mitigation

Mitigation Management

Align For Entities

My Draft Mitigations My Active Mitigations Consolidated Mitigations **Completed Mitigations**

NCR00170 Editor 1 Benton County Wind Farm, LLC

MY COMPLETED MITIGATIONS

TYPE	UNIQUE ID	REGION OR LRE	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	DATE SUBMITTED	COMPLETION DATE	STATUS
Mitigation Plan	2020-00786	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	RF-US	12/17/2020	12/17/2020	Complete
Mitigation Plan	2020-00787	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-009-6	R3.	RF-US	01/08/2021	01/08/2021	Complete
Mitigation Plan	2020-00789	RF	NCR00170 - Benton County Wind Farm, LLC in RF	VAR-002-4.1	R1.	RF-US	01/20/2021	01/20/2021	Complete
Mitigating Activities	2021-00015	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R1.	RF-US	01/14/2021	01/14/2021	Complete
Mitigating Activities	2021-00055	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/09/2021	02/09/2021	Complete
Mitigating Activities	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	03/22/2021	03/22/2021	Complete



TRACKING FINDING THROUGH DISPOSITION

ALIGN



Tracking Finding Through Disposition

Mitigation Management		Align For Entities							
My Align		Mitigations	Consolidated Mitigations	Completed Mitigations					
Compliance Monitoring		NCR00170 Editor 1 Benton County Wind Farm, LLC							
Enforcement Processing									
Mitigation Management									
Reports									
TYPE		REGION OR LRE	REGISTRATION	STANDARD	REQ	REGION AND JURISDICTION	DATE SUBMITTED	COMPLETION DATE	STATUS
Mitigating Activities	2020-00787	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	RF-US	12/17/2020	12/17/2020	Complete
Mitigation Plan	2020-00787	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-009-6	R3.	RF-US	01/08/2021	01/08/2021	Complete
Mitigation Plan	2020-00789	RF	NCR00170 - Benton County Wind Farm, LLC in RF	VAR-002-4.1	R1.	RF-US	01/20/2021	01/20/2021	Complete
Mitigating Activities	2021-00015	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R1.	RF-US	01/14/2021	01/14/2021	Complete
Mitigating Activities	2021-00055	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	02/09/2021	02/09/2021	Complete
Mitigating Activities	2021-00206	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	03/22/2021	03/22/2021	Complete
Mitigation Plan	2021-00207	RF	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	RF-US	03/23/2021	03/23/2021	Complete



Tracking Finding Through Disposition

Enforcement Processing Align For Entities

My Open Findings My Closed Findings NCR00170 Editor 1 Benton County Wind Farm, LLC

MY OPEN FINDINGS

MONITORING METHOD	UNIQUE ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	FINDING STATUS	SEND UPDATE	MITIGATION
Audit	2021-00207	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	03/01/2021	Enforcement Processing	+	Mitigation Plan Complete
Self-Report	2021-00206	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/20/2021	PNC Review	+	Mitigating Activities Complete
Self-Report	2021-00203	RF	03/17/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	03/15/2021	Preliminary Screening	+	Mitigating Activities Draft
Self-Report	2021-00166	RF	03/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	03/08/2021	PNC Review	+	Mitigating Activities Active
Self-Report	2021-00104	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Report	2021-00103	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-007-6	R1.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
Self-Log	2021-00102	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Active
Self-Report	2021-00055	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/05/2021	Enforcement Processing	+	Mitigating Activities Complete
Self-Report	2021-00050	RF	02/04/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	02/01/2021	PNC Review	+	Mitigating Activities In Verification
Self-Report	2021-00015	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R1.	01/13/2021	PNC Review	+	Mitigating Activities Complete

Page 1 of 1

INSTRUCTIONS

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Tracking Finding Through Disposition

Enforcement Processing Align For Entities

My Open Findings | My Closed Findings NCR00170 Editor 1 Benton County Wind Farm, LLC

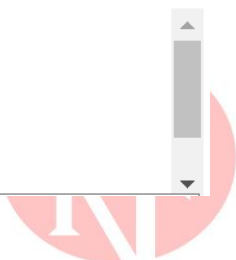
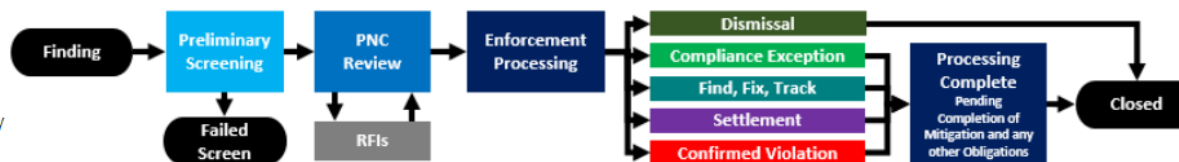
MY OPEN FINDINGS

MONITORING METHOD	UNIQUE ID	REGION OR LRE	DATE SUBMITTED	REGISTRATION	STANDARD	REQ	START DATE	FINDING STATUS	SEND UPDATE	MITIGATION
Audit	2021-00207	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	03/01/2021	Enforcement Processing	+	Mitigation Plan Complete
Self-Report	2021-00206	RF	03/22/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/20/2021	Enforcement Processing	+	Mitigating Activities Complete
Self-Report	2021-00203	RF	03/17/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R4.	03/15/2021	Preliminary Screening	+	Mitigating Activities Draft
Self-Report	2021-00166	RF	03/12/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-006-6	R1.	03/08/2021	PNC Review	+	Mitigating Activities Active
Self-Report	2021-00104	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Draft
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Self-Log	2021-00102	RF	02/25/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/23/2021	Enforcement Processing	+	Mitigating Activities Active
Self-Report	2021-00055	RF	02/09/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-004-6	R5.	02/05/2021	Enforcement Processing	+	Mitigating Activities Complete
Self-Report	2021-00050	RF	02/04/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R2.	02/01/2021	PNC Review	+	Mitigating Activities In Verification
Self-Report	2021-00015	RF	01/14/2021	NCR00170 - Benton County Wind Farm, LLC in RF	CIP-002-5.1a	R1.	01/13/2021	PNC Review	+	Mitigating Activities Complete

Page 1 of 1

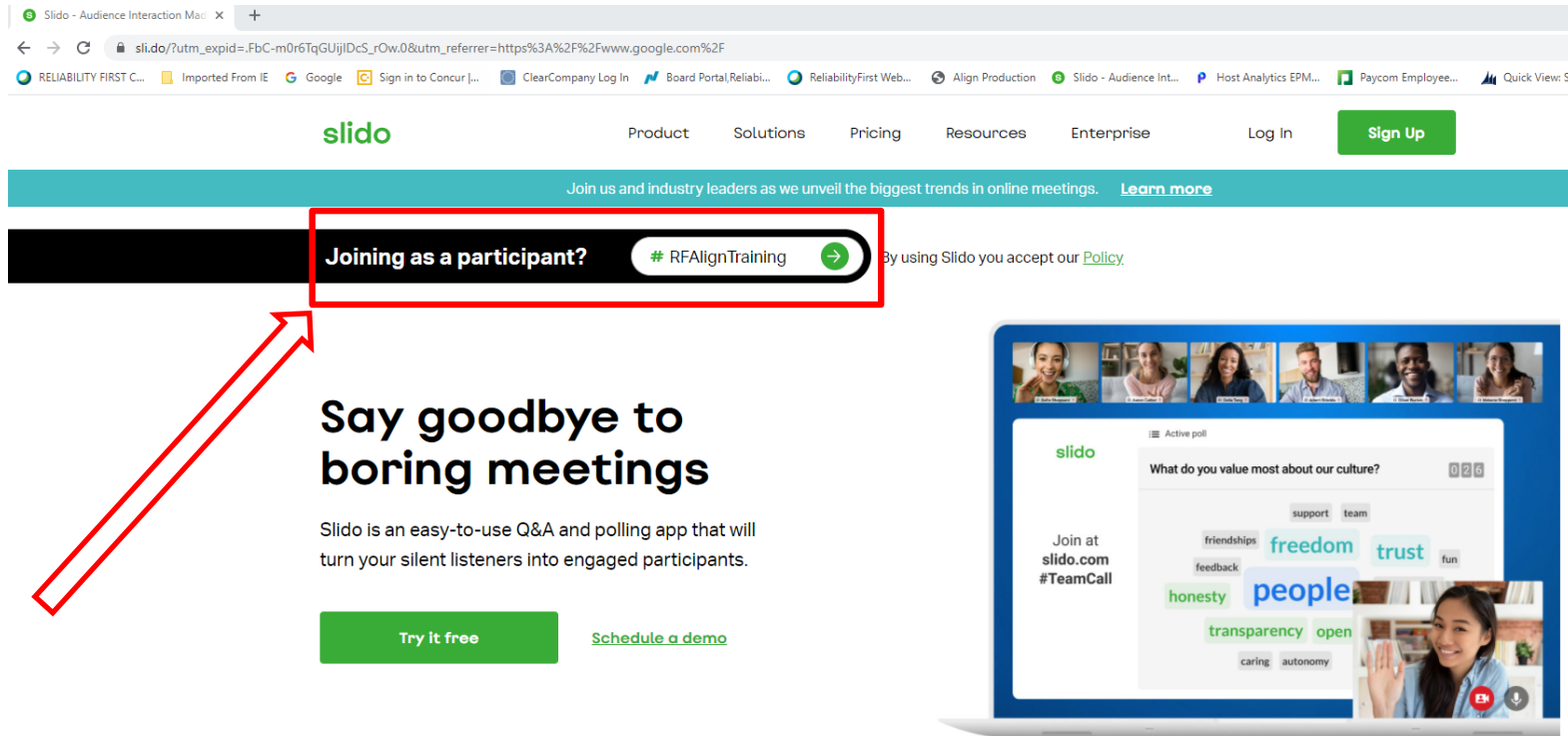
INSTRUCTIONS

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Section 2 – Slido Questions

- Login to **Slido.com** use the event code - **#RFAlignTraining**
- Optionally, via mobile device and scan the QR Code below



The screenshot shows the Slido website interface. At the top, there is a navigation bar with the Slido logo and links for Product, Solutions, Pricing, Resources, Enterprise, Log In, and Sign Up. Below the navigation bar is a teal banner with the text "Join us and industry leaders as we unveil the biggest trends in online meetings. [Learn more](#)".

The main content area features a black header with the text "Joining as a participant?" followed by a search bar containing the event code "#RFAlignTraining" and a green arrow button. A red box highlights this search bar, and a red arrow points from it towards the text "Say goodbye to boring meetings".

Below the header, the text "Say goodbye to boring meetings" is displayed in a large, bold font. Underneath, it says "Slido is an easy-to-use Q&A and polling app that will turn your silent listeners into engaged participants." There are two buttons: "Try it free" and "Schedule a demo".

To the right of the text is a laptop displaying a Slido poll. The poll question is "What do you value most about our culture?". The poll results show various words like "freedom", "trust", "people", "honesty", "transparency", "open", "support", "team", "friendships", "feedback", "caring", "autonomy", and "fun".

Or Scan
QR Code



You can use Slido with



Questions & Answers

Forward Together  **ReliabilityFirst**

BREAK
10 MINUTES



Section 3

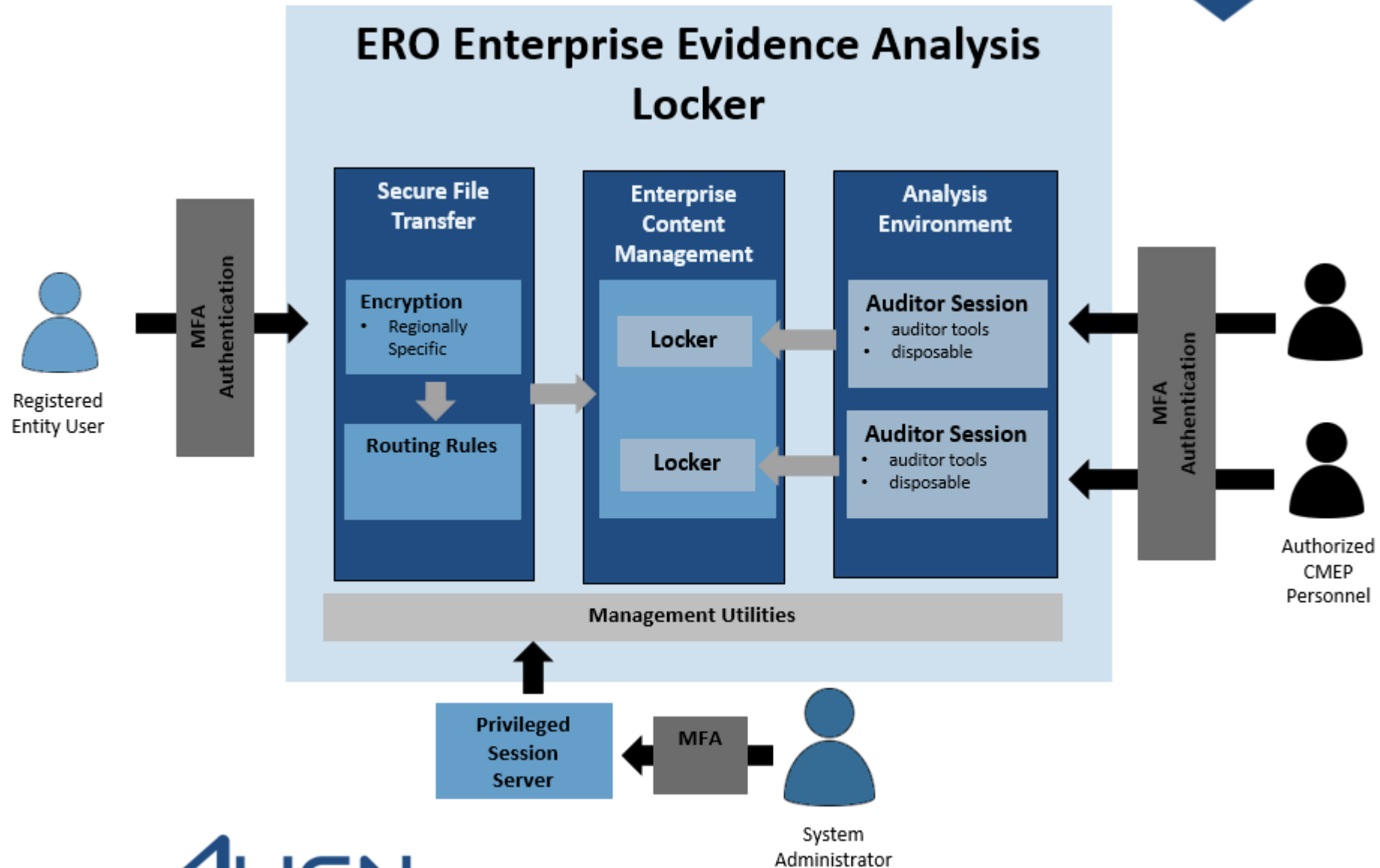
**ERO Secure Evidence Locker (SEL) Access
Orientation to the SEL Web-based Interface
Submitting Evidence to the SEL**

**Use and validation of unique Evidence Reference IDs
Information on Evidence file types, and size**

ALIGN

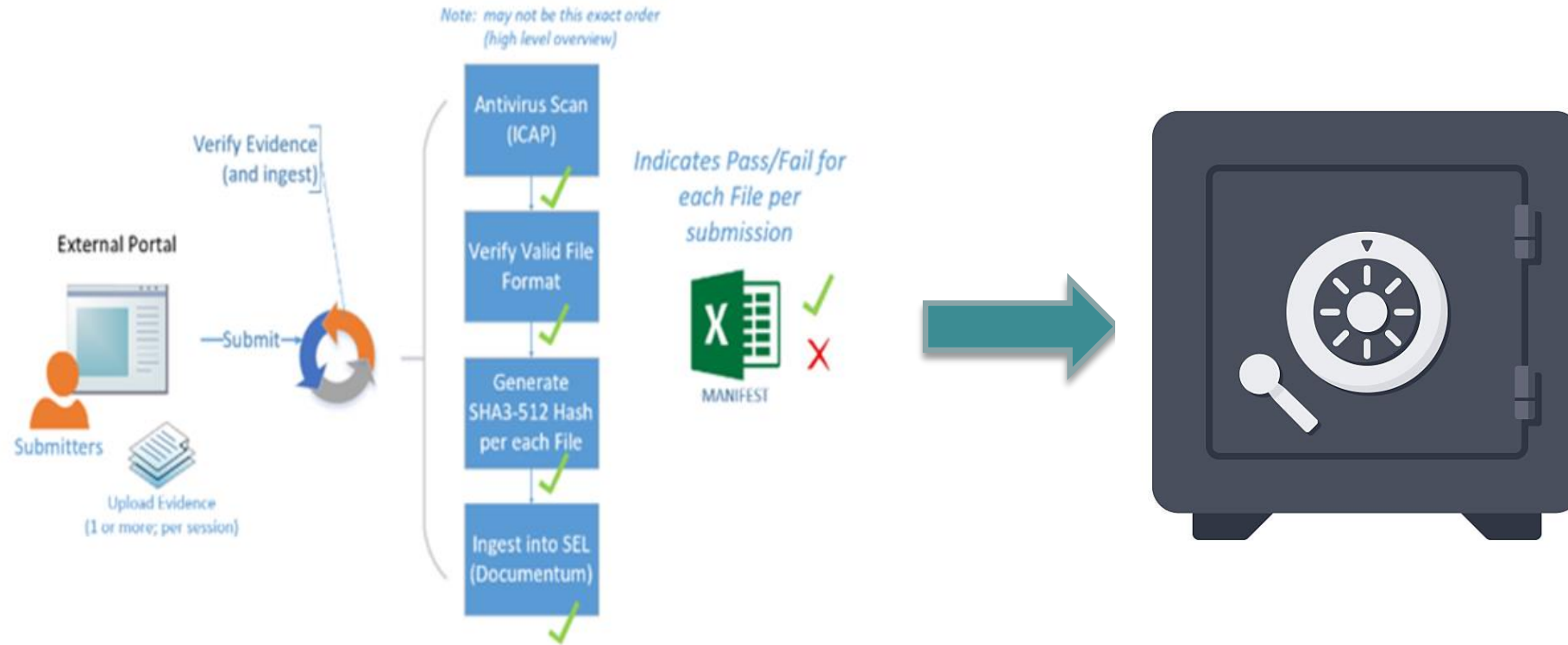


What is the ERO SEL?



ERO Secure Evidence Locker Portal

From Portal to Secure Evidence Locker (High Level Overview)

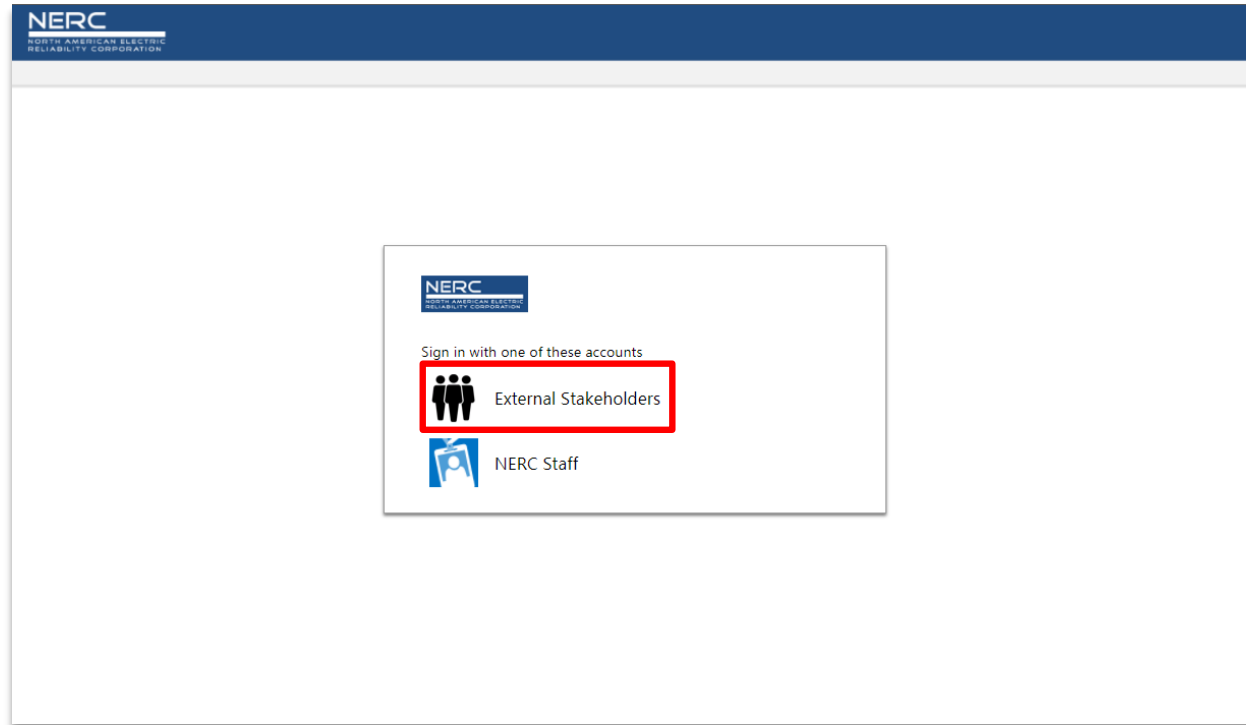


ERO Secure Evidence Locker Access

- **Google Chrome or Microsoft Edge are the preferred browsers. Internet Explorer is NOT supported!**



ERO Secure Evidence Locker Walkthrough



ERO Secure Evidence Locker Walkthrough

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Sign in

Username

Password

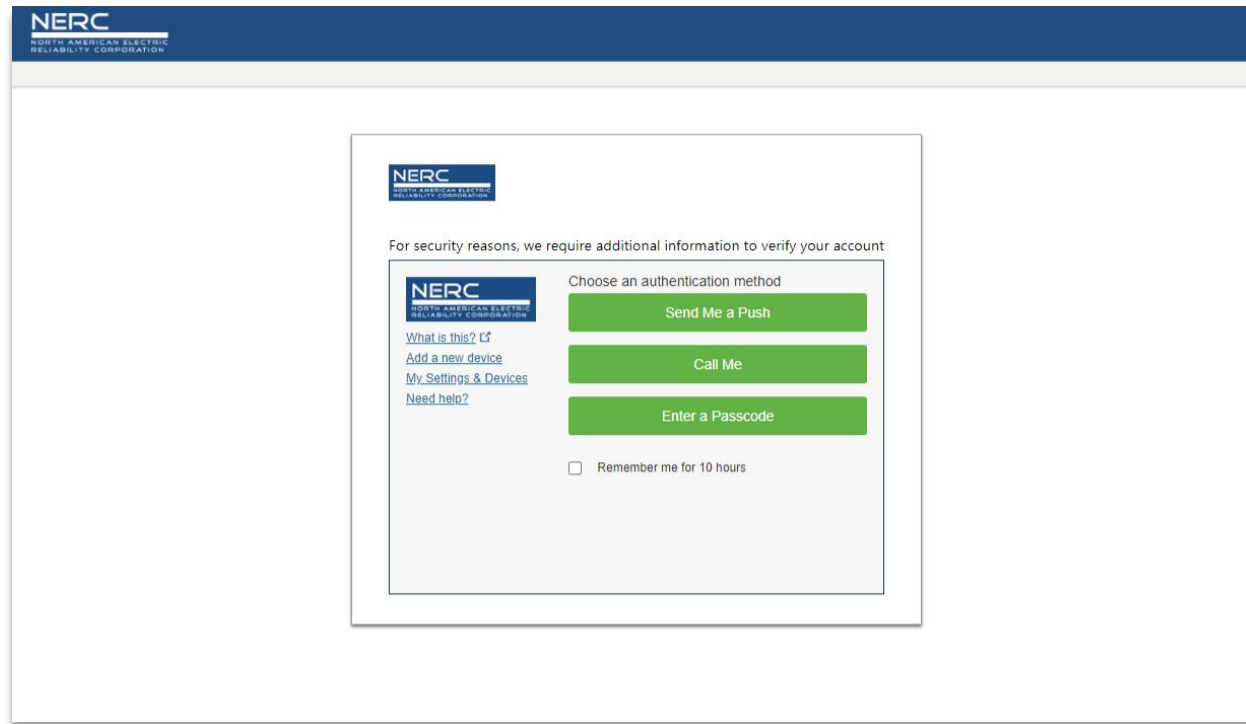
[Sign in](#)

[Forgot username or password?](#)

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.



ERO Secure Evidence Locker Walkthrough



The screenshot displays the NERC (North American Electric Reliability Corporation) account verification interface. At the top, the NERC logo is visible. The main content area features a smaller NERC logo and the text: "For security reasons, we require additional information to verify your account". Below this, there is a section titled "Choose an authentication method" with three green buttons: "Send Me a Push", "Call Me", and "Enter a Passcode". To the left of these buttons, there are links for "What is this?", "Add a new device", "My Settings & Devices", and "Need help?". At the bottom of the form, there is a checkbox labeled "Remember me for 10 hours".



ERO Secure Evidence Locker Walkthrough

Reference ID: RF|NCR00170|VI2021-00206|VI2021-00206|CIP-004-6|R5.|5.3.,5.1.

The screenshot displays the ERO Secure Evidence Locker interface. At the top, there is a header with logos for NERC (North American Electric Reliability Corporation), HRO (Highest Reliability Organization), NPCC, Inc., RF (Reliability First), SERC, TEXASRE, and WECC. Below the header, the page title is "Secure Evidence Locker" and the user is identified as "Submitter3 Entity (seltesting@nerc.com)".

Step 1 - Validation
Enter a Reference ID and click "Validate" to add new evidence to your submission.

A red arrow points to a text input field containing "XXXXXXX" and a "Validate" button with a checkmark icon.

Step 2 - Upload Files
Click "Upload" to add evidence to your submission.
Do NOT include any sensitive information in the file names that you are uploading!
Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) as well as a number of file types that can contain executable malware are prohibited from upload.
If you experience any problems uploading evidence, contact your Region for assistance.

An "Upload" button with a plus icon is visible.

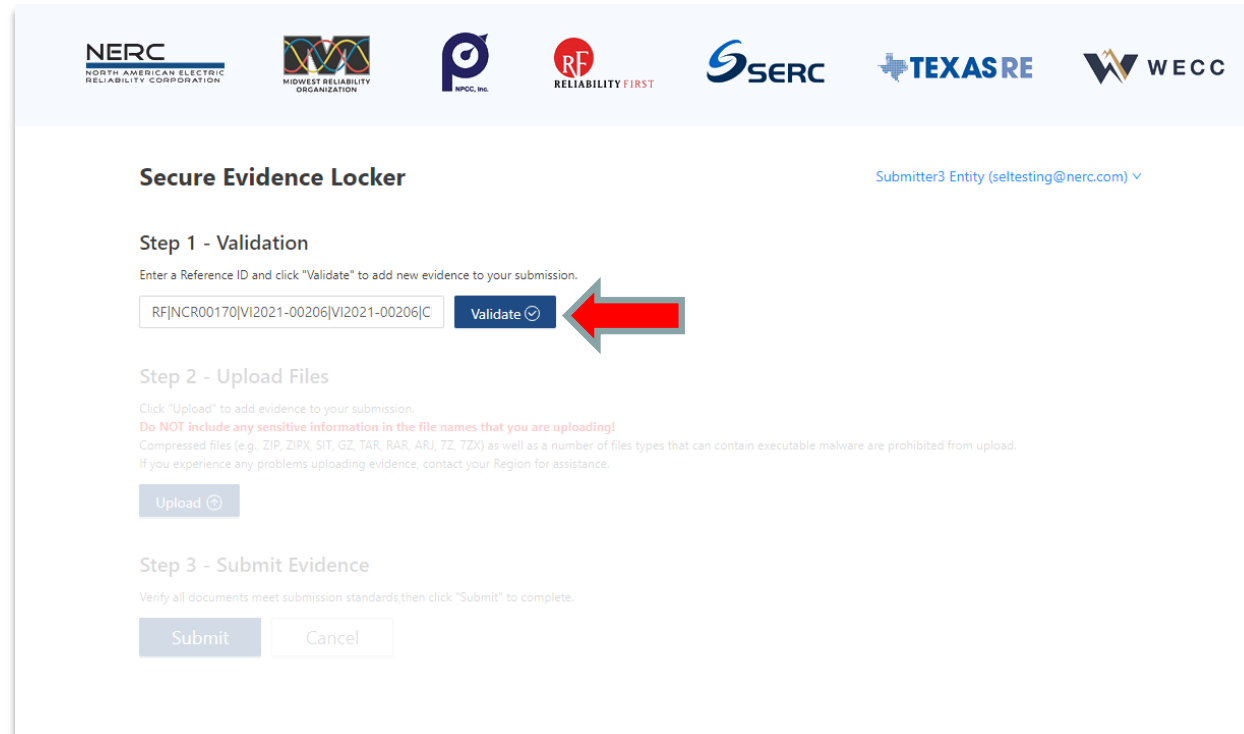
Step 3 - Submit Evidence
Verify all documents meet submission standards, then click "Submit" to complete.

"Submit" and "Cancel" buttons are visible at the bottom.



ERO Secure Evidence Locker Walkthrough

Reference ID: RF|NCR00170|VI2021-00206|VI2021-00206|CIP-004-6|R5.|5.3.,5.1.



The screenshot displays the 'Secure Evidence Locker' interface. At the top, there is a navigation bar with logos for NERC, HRO, NPOC, RF, SERC, TEXASRE, and WECC. Below the navigation bar, the page title is 'Secure Evidence Locker' and the user is identified as 'Submitter3 Entity (seltesting@nerc.com)'. The interface is divided into three steps:

- Step 1 - Validation:** The user is prompted to 'Enter a Reference ID and click "Validate" to add new evidence to your submission.' A text input field contains the Reference ID 'RF|NCR00170|VI2021-00206|VI2021-00206|C'. A 'Validate' button with a checkmark icon is positioned to the right of the input field. A red arrow points to this button.
- Step 2 - Upload Files:** The user is prompted to 'Click "Upload" to add evidence to your submission.' A warning message states: 'Do NOT include any sensitive information in the file names that you are uploading! Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) as well as a number of file types that can contain executable malware are prohibited from upload. If you experience any problems uploading evidence, contact your Region for assistance.' An 'Upload' button with a plus icon is located below the text.
- Step 3 - Submit Evidence:** The user is prompted to 'Verify all documents meet submission standards then click "Submit" to complete.' There are two buttons: 'Submit' and 'Cancel'.



ERO Secure Evidence Locker Walkthrough

Secure Evidence Locker

Step 1 - Validation

Enter a Reference ID and click "Validate" to add new evidence to your submission.

✓ **Valid Reference ID**

Region: RF
NCR: NCR00170
CMEP Activity: VI2021-00206
Tags: VI2021-00206



ERO Secure Evidence Locker Walkthrough

Step 1 - Validation

Enter a Reference ID and click "Validate" to add new evidence to your submission.

RF|NCR00170|VI2021-00206|VI2021-00206|

Validate ✓



Invalid Reference ID

The Reference ID you entered is invalid.

Please find a valid Reference ID and try again.



ERO Secure Evidence Locker Walkthrough

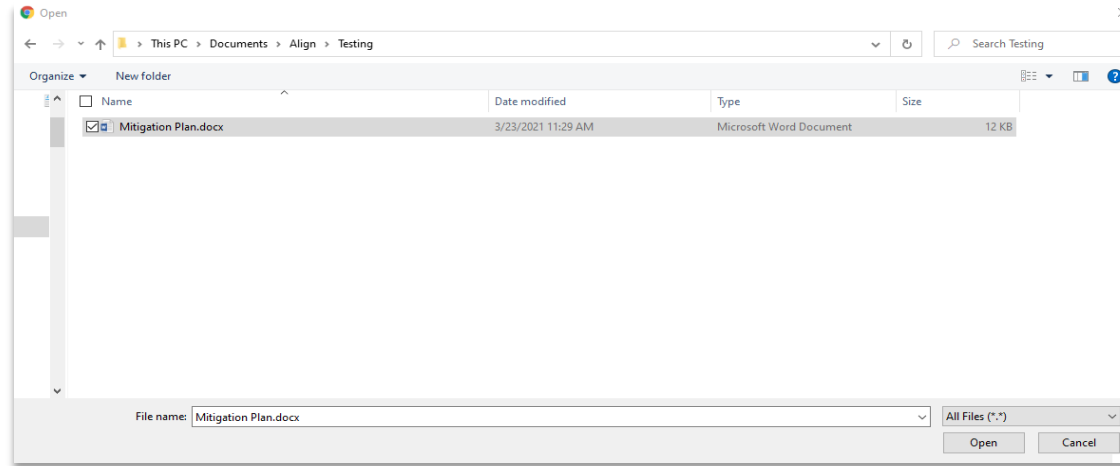
Upload a single file



Step 2 - Upload Files

Click "Upload" to add evidence to your submission.
Do NOT include any sensitive information in the file names that you are uploading!
Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) as well as a number of files types that can contain executable malware are prohibited from upload.
If you experience any problems uploading evidence, contact your Region for assistance.

[Upload](#)



Step 2 - Upload Files

Click "Upload" to add evidence to your submission.
Do NOT include any sensitive information in the file names that you are uploading!
Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) as well as a number of files types that can contain executable malware are prohibited from upload.
If you experience any problems uploading evidence, contact your Region for assistance.

[Upload](#)

Mitigation Plan.docx



ERO Secure Evidence Locker Walkthrough

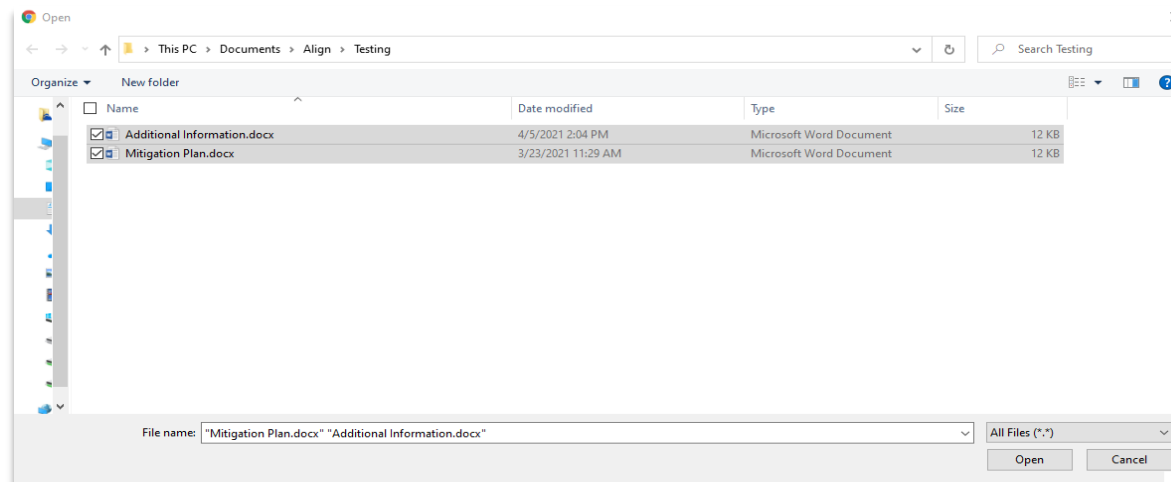
Upload multiple files



Step 2 - Upload Files

Click "Upload" to add evidence to your submission.
Do NOT include any sensitive information in the file names that you are uploading!
Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) as well as a number of files types that can contain executable malware are prohibited from upload.
If you experience any problems uploading evidence, contact your Region for assistance.

Upload



Step 2 - Upload Files

Click "Upload" to add evidence to your submission.
Do NOT include any sensitive information in the file names that you are uploading!
Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) as well as a number of files types that can contain executable malware are prohibited from upload.
If you experience any problems uploading evidence, contact your Region for assistance.

Upload

- Additional Information.docx
- Mitigation Plan.docx



ERO Secure Evidence Locker Walkthrough

The screenshot displays the ERO Secure Evidence Locker interface. At the top, logos for NERC, MRO, NERC, RF (Reliability First), SERC, TEXASRE, and WECC are visible. The main heading is "Secure Evidence Locker" with a dropdown menu for "Submitter3 Entity (seltesting@nerc.com)".

Step 1 - Validation
Enter a Reference ID and click "Validate" to add new evidence to your submission.

RF|NCR00170|VI2021-00206|VI2021-00206...

Valid Reference ID

- Region: RF
- NCR: NCR00170
- CMEP Activity: VI2021-00206
- Tags: VI2021-00206

Step 2 - Upload Files
Click "Upload" to add evidence to your submission.
Do NOT include any sensitive information in the file names that you are uploading!
Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) as well as a number of files types that can contain executable malware are prohibited from upload.
If you experience any problems uploading evidence, contact your Region for assistance.

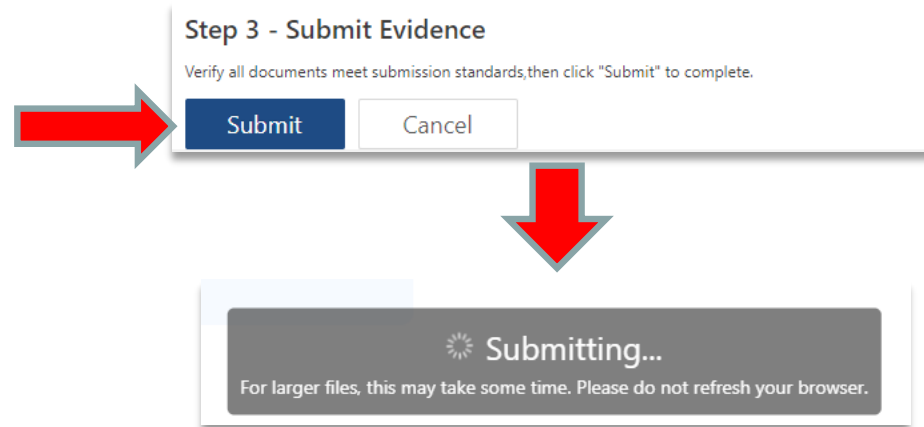
Mitigation Plan.docx

Step 3 - Submit Evidence
Verify all documents meet submission standards, then click "Submit" to complete.

File size limit is 2 GB
Total session limit is 8 GB total



ERO Secure Evidence Locker Walkthrough



ERO Secure Evidence Locker Walkthrough

Step 1 - Validation
Enter a Reference ID and click "Validate" to add new evidence to your submission.

RF|NCR00170|VI2021-00206|VI2021-00206|...

Valid Reference ID

Region: RF
NCR: NCR00170
CMEP Activity: VI2021-00206
Tags: VI2021-00206

Step 2 - Upload Files
Click "Upload" to add evidence to your submission.
Do NOT include any sensitive information in the file names that
Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) and
If you experience any problems uploading evidence, contact your f... scutable malware are prohibited from upload.

Mitigation Plan.docx

Step 3 - Submit Evidence
Verify all documents meet submission standards, then click "Submit" to complete.

Success!

Your evidence has been successfully submitted for processing. You will receive an eMail notification when the processing is complete.

? *Do you want to submit more evidence for the same activity?*



ERO Secure Evidence Locker Walkthrough


Incorrect file type submission

Step 2 - Upload Files

Click "Upload" to add evidence to your submission.

Do NOT include any sensitive information in the file names that you are uploading!

Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) as well as a number of files types that can contain executable malware are prohibited from upload. If you experience any problems uploading evidence, contact your Region for assistance.

Upload 

! **Upload Error**

The files you are uploading contains one or more invalid files, please check again

Test.zip (The type of the uploaded file is invalid)

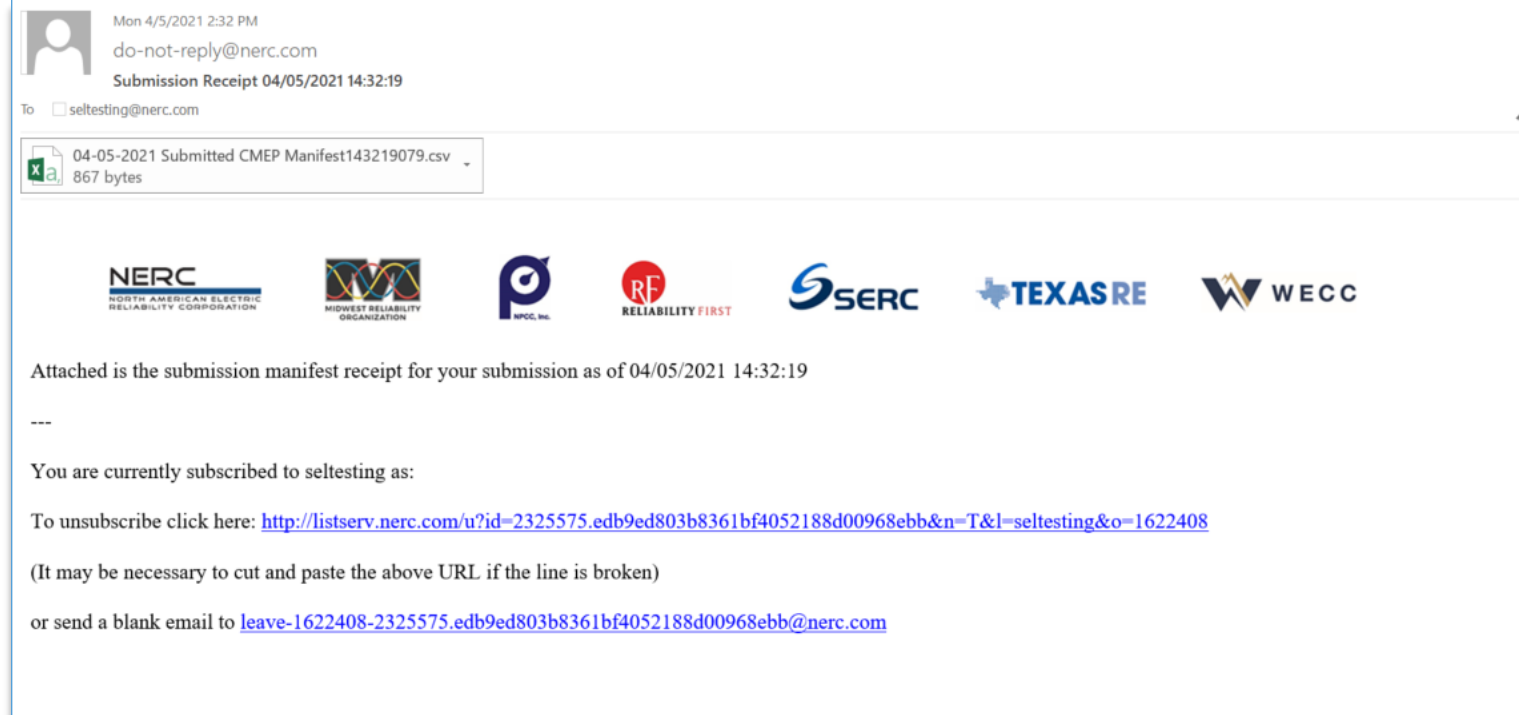
Please upload valid file type and size.

Compressed files and executable files cannot be uploaded!



ERO Secure Evidence Locker Walkthrough

Manifest email upon successful upload



ERO Secure Evidence Locker Walkthrough

Manifest attachment upon successful upload

	A	B	C	D	E	F	G	H
1	File Name	NCR	CMEP Activity	SEL ID	SHA3-512 Signature	Pass/Fail	Failure Reason	
2	Additional Information.docx	NCR00170	VI2021-00206	0902f2cf80065f9a	px49cKldVONORN9y3Rr30FLRTAROF/zbso5WvJInuexceJmBNnpBnKPXZxur5N/LASaFQdD1+T4jv8p4VgEzbQ==	Pass		
3	Mitigation Plan.docx	NCR00170	VI2021-00206	0902f2cf80065f9b	PKyMBv4sWRwrJweHbGXeL8wvsY9COQk1CVLasYB5mx+c05psAvTL+82fzhYr5Zka52mNFvHZtjllkVjpVqAArW==	Pass		
4								
5								
6								



User Guide

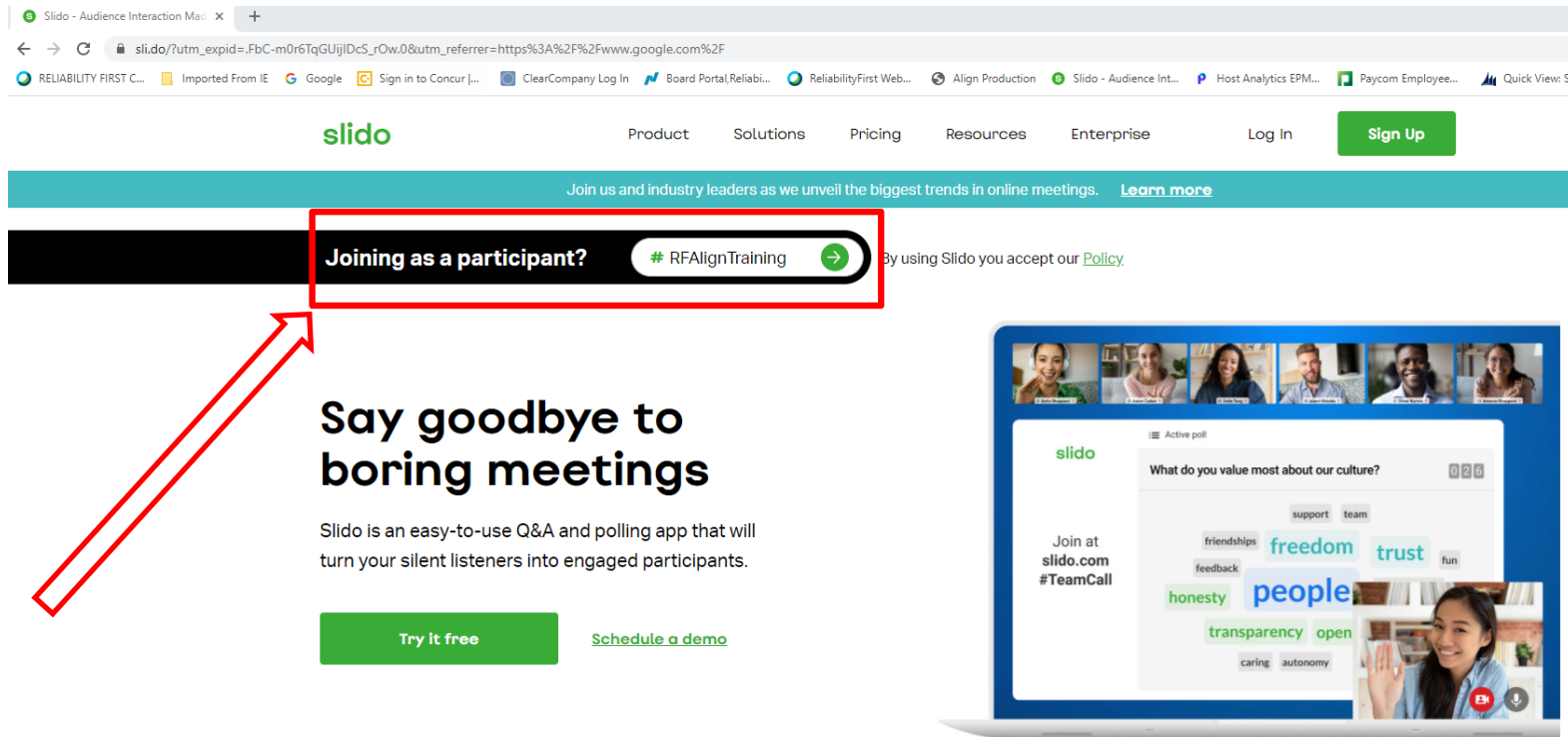
➤ Registered Entity ERO SEL Portal Guide

- https://trn.nerc.com/User%20Guide/RE_NERC_SEL_Portal.pdf



Section 3 – Slido Questions

- Login to **Slido.com** use the event code - **#RFAlignTraining**
- Optionally, via mobile device and scan the QR Code below



The screenshot shows the Slido website interface. At the top, there is a navigation bar with the Slido logo and links for Product, Solutions, Pricing, Resources, Enterprise, Log In, and Sign Up. Below the navigation bar is a teal banner with the text "Join us and industry leaders as we unveil the biggest trends in online meetings. [Learn more](#)". Underneath the banner is a black bar with the text "Joining as a participant?" followed by a search input field containing "#RFAlignTraining" and a green arrow button. A red box highlights this input field, and a red arrow points from it to the text "Say goodbye to boring meetings". Below this text is a paragraph: "Slido is an easy-to-use Q&A and polling app that will turn your silent listeners into engaged participants." There are two buttons: "Try it free" and "Schedule a demo". To the right of the text is a laptop displaying a Slido poll interface with the question "What do you value most about our culture?" and various word cloud options like "freedom", "trust", "people", "honesty", "transparency", "open", "support", "team", "friendships", "feedback", "caring", "autonomy", and "fun".

Or Scan
QR Code



You can use Slido with

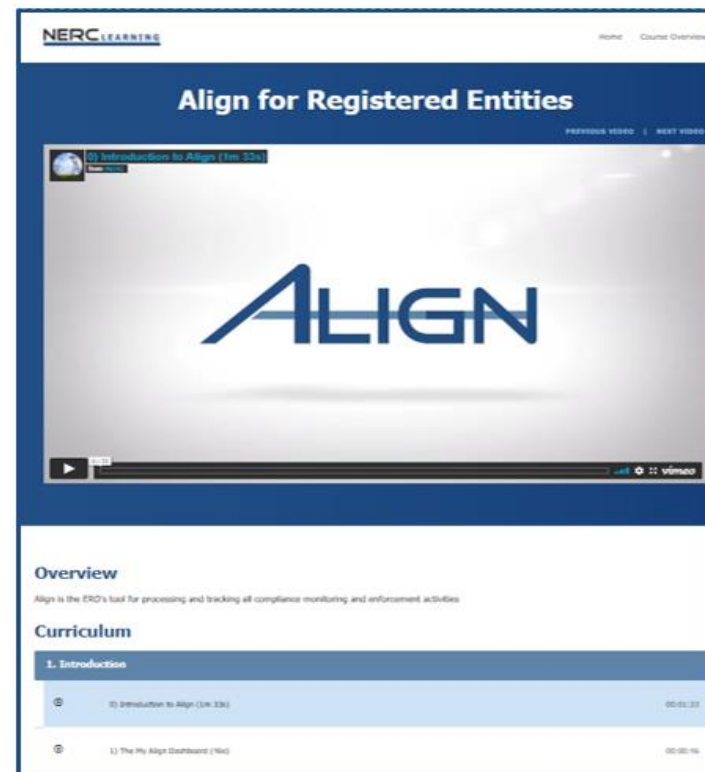
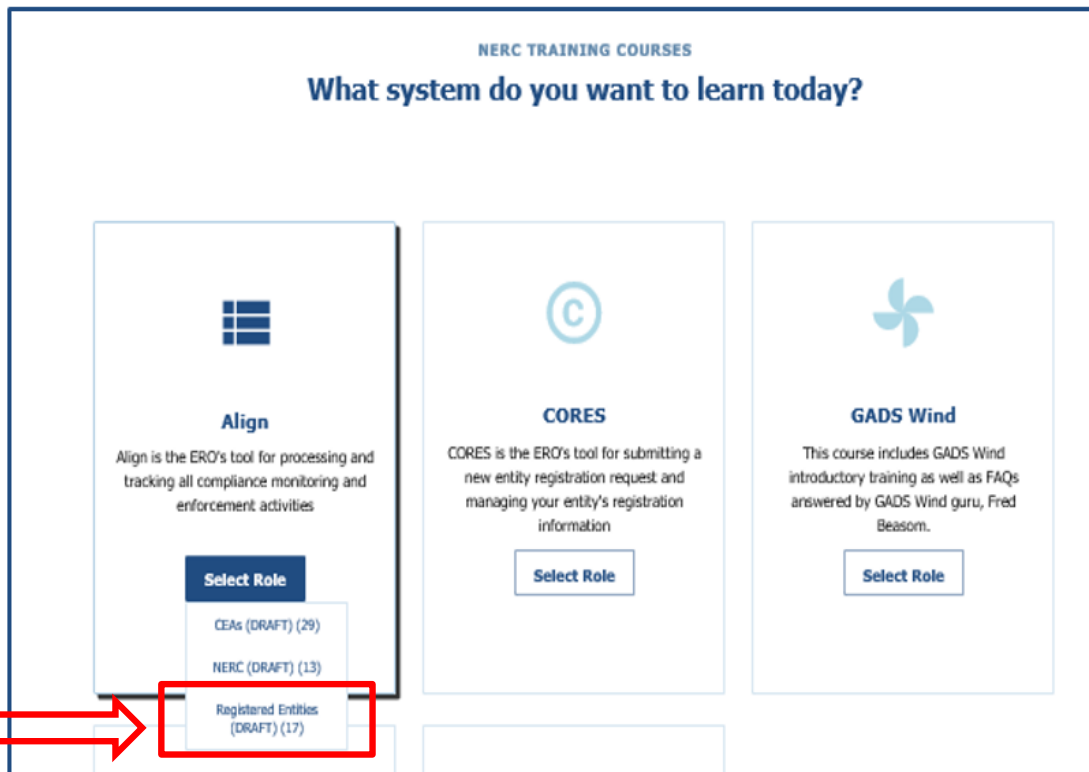


Questions & Answers

Forward Together  **ReliabilityFirst**

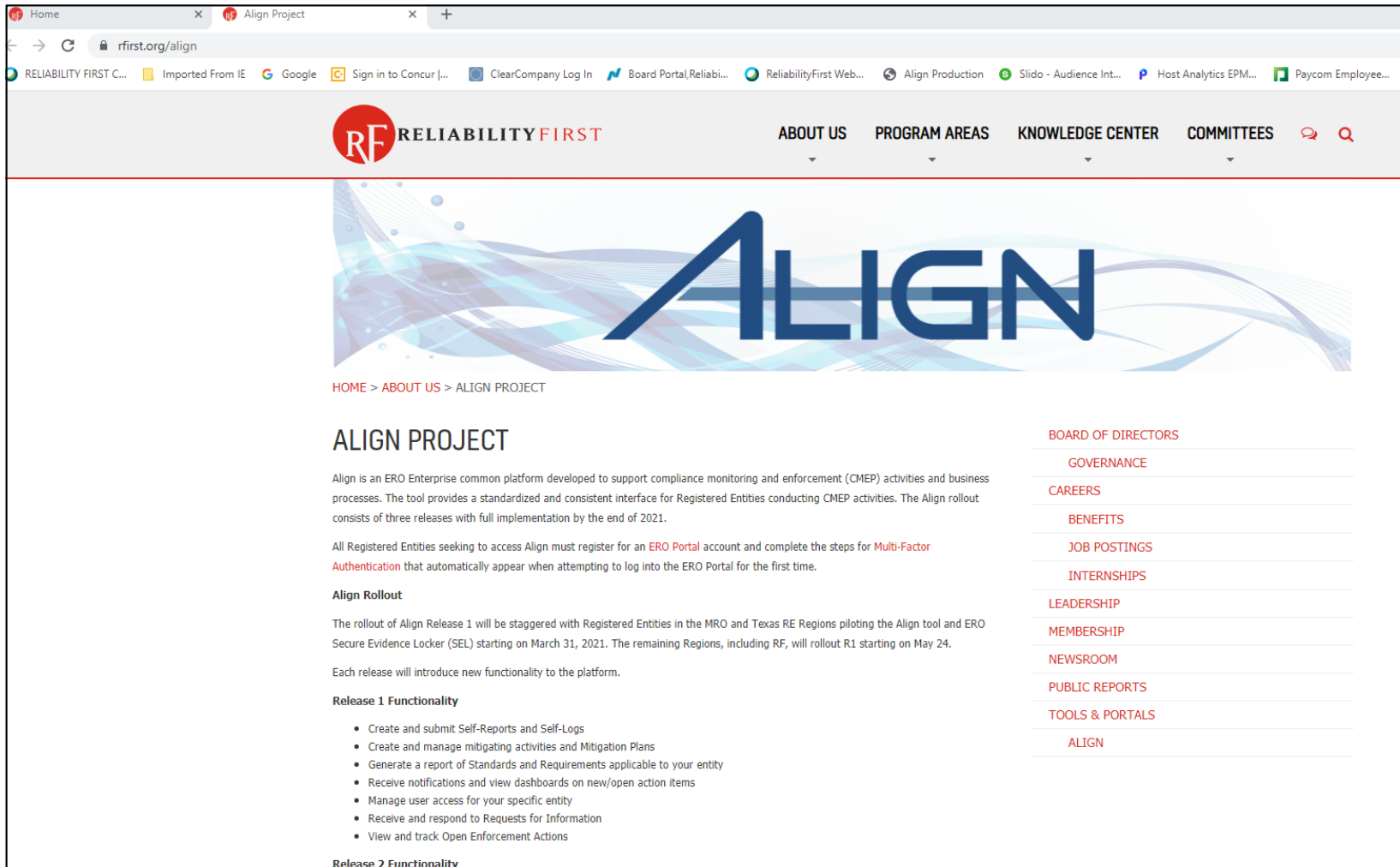
Align Release 1 – Self Service Training Resources

- All registered entity Align users should visit the NERC Training site at <https://training.nerc.net/>
 - ✓ The site includes Align Training Videos and End User Guides which will help familiarize you with the Align and ERO SEL systems



Align Release 1 – Information Resources

➤ <https://rfirst.org/align>



Home x Align Project x +

rfirst.org/align

RELIABILITY FIRST C... Imported From IE Google Sign in to Concur [...] ClearCompany Log In Board Portal, Reliabi... ReliabilityFirst Web... Align Production Slido - Audience Int... Host Analytics EPM... Paycom Employee...

RF RELIABILITY FIRST ABOUT US PROGRAM AREAS KNOWLEDGE CENTER COMMITTEES

ALIGN

HOME > ABOUT US > ALIGN PROJECT

ALIGN PROJECT

Align is an ERO Enterprise common platform developed to support compliance monitoring and enforcement (CMEP) activities and business processes. The tool provides a standardized and consistent interface for Registered Entities conducting CMEP activities. The Align rollout consists of three releases with full implementation by the end of 2021.

All Registered Entities seeking to access Align must register for an [ERO Portal](#) account and complete the steps for [Multi-Factor Authentication](#) that automatically appear when attempting to log into the ERO Portal for the first time.

Align Rollout

The rollout of Align Release 1 will be staggered with Registered Entities in the MRO and Texas RE Regions piloting the Align tool and ERO Secure Evidence Locker (SEL) starting on March 31, 2021. The remaining Regions, including RF, will rollout R1 starting on May 24.

Each release will introduce new functionality to the platform.

Release 1 Functionality

- Create and submit Self-Reports and Self-Logs
- Create and manage mitigating activities and Mitigation Plans
- Generate a report of Standards and Requirements applicable to your entity
- Receive notifications and view dashboards on new/open action items
- Manage user access for your specific entity
- Receive and respond to Requests for Information
- View and track Open Enforcement Actions

Release 2 Functionality

BOARD OF DIRECTORS

GOVERNANCE

CAREERS

BENEFITS

JOB POSTINGS

INTERNSHIPS

LEADERSHIP

MEMBERSHIP

NEWSROOM

PUBLIC REPORTS

TOOLS & PORTALS

ALIGN



➤ **Please direct all feedback and questions regarding this Align and ERO SEL Training session to:**

- RF Align Change Agent – Ray Sefchik
– Ray.sefchik@rfirst.org



Questions & Answers

Forward Together  **ReliabilityFirst**