Align Self-Certification Questions and Answers

General

The posting and notification date for Annual Self-Certifications for the 2021 calendar year was delayed from December 15, 2021, to February 1, 2022. Will WECC continue to use February 1 as the annual posting and notification date moving forward?

No. WECC plans to post Annual Self-Certification requests (i.e., submit the requests in Align) and send notifications via automated email on December 15 of the calendar year designated for Self-Certification.

Who is the best contact for general user questions?

Send any general inquiries regarding Align to align@wecc.org. Send other inquiries to oversight@wecc.org.

Notifications

How is my entity notified that we have a pending Self-Certification request? Do I need to log in to Align to see that WECC has submitted a Self-Certification request?

When WECC submits a Self-Certification request to an entity in Align, the system sends an automated email notification to the Primary Compliance Contact (PCC) and any Alternate Compliance Contacts (ACC) listed in CORES. If you log in to Align, you will find the pending request in the Self-Certifications view under the Active Self Cert Requests tab.

Question/Requirement Assignments

Why is more than one person assigned to respond to the same "question" in a Self-Certification request?

Align creates a duplicate set of "questions" (i.e., requirements) for each person with an "Align Registered Entity Submitter" role in CORES. Note that the submitter role applies to both Self-Certifications and Periodic Data Submittals (PDS) in Align.

Is there a way to only have one person assigned per question/requirement?

NERC is redesigning this process. We anticipate that, in the future, the Registered Entity will be able to select a single respondent. This won't be available for the 2021 Annual Self-Certification, but it should be in place next year.

Should more than one person respond to the same questions/requirements?

No. To submit the overall response, the system requires that the same submitter complete responses for an entire set of questions/requirements assigned only to that person. You should ignore the other sets of questions/requirements.

Several requirements have been assigned to someone who is no longer with the company. Can those requirements be assigned to someone else?

Once the Self-Certification Request is generated in Align there is not a way to edit the assignments.

If you re-sort by requirement by clicking on the column header, or if you page down, you can see whether Align created more than one set of questions/requirements. If so, you can ignore the set of questions/requirements assigned to the former employee and respond to those assigned to another submitter. If the former employee is the only submitter, you'll need to add another submitter in CORES and contact WECC to cancel and resubmit the Self-Certification request. In any case, you'll need to update the information in CORES to remove the former employee, since that person is no longer with your company.

What happens if there is only one person with an Align Registered Entity Submitter role and that person is no longer available to respond?

Contact one of the WECC staff members listed in the request instructions for assistance, or send an email to oversight@wecc.org. Once you've granted a new person the "Align Registered Entity Submitter" role in CORES, WECC will need to cancel and resubmit the Self-Certification request.

Evidence

Is evidence required for everything listed in the "Evidence" section?

The Align system automatically provides the reference IDs in the "Evidence" section for each Standard Requirement in the Self-Certification request. WECC, however, does not require you to upload evidence to the Secure Evidence Locker (SEL) as part of the Annual Self-Certification. If WECC decides to request any evidence as part of its review, you'll receive a formal Request for Information (RFI) in Align.

Does WECC require an entity to provide evidence with a response of "Non-Compliant" or an associated Potential Noncompliance (PNC)?

No. For questions or requirements included in an Annual Self-Certification request, WECC requires each response of "Non-Compliant" to have a corresponding new or existing PNC. WECC does not,

however, require you to submit any evidence along with the overall response. If WECC decides to request any evidence as part of its review, you'll receive a formal Request for Information (RFI) in Align.

Export

Can the Self-Certification request be exported from Align?

Unfortunately, Align doesn't have an export feature for Self-Certification requests. We are hoping to see that enhancement with a system update, but at this point we don't know when that will be.

No Self-Certification Request in Align

There is no Self-Certification request for our Registered Entity in Align. Does this mean that there are no requirements for Self-Certification this year?

Annual Self-Certification requests are based on the most recent Compliance Oversight Plan (COP) for a Registered Entity. If the Primary Compliance Contact (PCC) and any Alternate Compliance Contacts (ACC) for the entity did not receive an automated email notification of a request, then there are no Standard Requirements scheduled for Self-Certification for the 2021 calendar year.

Comments

Is a comment required for a Self-Certification response?

Adding a comment is not required, regardless of the response (i.e., Compliant, Non-Compliant, Not-Applicable, or Do Not Own). We do, however, encourage you to provide any relevant information, especially for any response other than "Compliant."

For example, if you are responding "Non-Compliant" for a requirement, you should reference the new or existing finding or potential noncompliance (PNC) in the comments box for the reviewer. Similarly, when you submit an attestation for a response of "Not-Applicable" or "Do Not Own," it would be helpful to note that in the comments section.

Not-Applicable vs. Do Not Own Response

How do I decide when to respond "Not-Applicable" vs. "Do Not Own"?

To help decide whether to respond "Not Applicable," refer to the Reliability Standard, which describes applicability.

 "Do Not Own" means that you do not own facilities subject to the Standard Requirement. If a Standard Requirement is requiring the Registered Entity with a specific reliability function to perform some task, and the entity does not own the type of device or system to perform that task, it should mark the response as "Do Not Own."

Delegation Checkbox

There's a "Delegate Section" checkbox at the bottom of each Self-Certification response page. When should a Registered Entity use this?

That feature is not functional. It may not do anything if you try to use it, but we recommend not doing so.

Submission Period

When can a Registered Entity submit a response for the Annual Self-Certification and what is the due date?

The submission period for the Annual Self-Certification for the 2021 calendar year is from February 15, 2022, through April 15, 2022. Specifically, the "Submit on or after" date of February 15, 2022, is the first day you can submit the self-cert response to WECC for review. The "But no later than" date of April 15, 2022, is the due date.

Responses

If I select "Save Draft" to save a response, is WECC able to see the draft response, or is it only available to WECC to view once "Save" is clicked?

WECC only accesses Self-Certification responses once they're submitted by the entity and are available for its review.

If a person (submitter) prepares a response for a question or requirement and clicks "Save Draft," can another person open and review the draft response?

No. You can only respond to and view draft responses for questions or requirements assigned to you. We expect this to change with a future enhancement to Align, but we don't have a timeline.

If you were non-compliant during the monitoring period but completed a Self-Report and were compliant again before the end of the period, do you respond "Non-Compliant"?

Yes. If you were non-compliant at any point during the monitoring period, you should respond "Non-Compliant." If you previously submitted a Self-Report for the PNC, whether the noncompliance is ongoing or mitigated, you should note that in the comments. If you haven't yet submitted a PNC, you would go to the "Findings" section in the Self-Certification request, create and submit one, then note it in the comments.

Does a PNC for a Non-Compliant response need to be completed before the Self-Certification due date?

No. You should create a draft finding from the Self-Certification record. This will give the PNC the appropriate monitoring method (i.e., Self-Certification). While WECC prefers you to submit the PNC

before submitting your Self-Certification response, you may complete your internal process before submitting the draft finding.

Is there a way to see my responses after submitting the overall response for Compliance Enforcement Authority (CEA) review?

No. Once you submit the overall response for WECC's review, or after WECC completes its review, you can open the overall response, but you can't see the responses for individual requirements. We expect this to be modified with a future enhancement to Align. We don't, however, have a timeline.

Guided Self-Certifications

Is it possible for WECC to issue an Annual Self-Certifications request and one or more quarterly Guided Self-Certification (GSC) requests during the same year?

Yes. WECC uses a Registered Entity's current Compliance Oversight Plan (COP) to determine whether, and for what year(s), to submit an Annual Self-Certification request. WECC, however, may also submit quarterly GSC or Self-Certification with Evidence (SCwE) requests to the same entity during the same year.

Can entities expect to receive a GSC request during an audit year?

Typically, WECC will not request a GSC for Standard Requirements included in the Audit scope. It is possible, however, to receive a GSC request for other requirements.

How long does it take WECC to review a GSC?

WECC allows two-to-three months for GSC reviews, but it could take longer depending on resource availability.

Attestations

Where can I see Attestations in Align and how long does it take WECC to approve them?

While you create Attestations in the "Create Attestations" section in a Self-Certification or Periodic Data Submittal (PDS) request, you view and managed them in the "Attestations" view in Align. Use the "My Align" dropdown menu to navigate to the Attestations view.

WECC expects to review Attestations within a few weeks of the due date of the associated Self-Certification or PDS request. Attestations are, of course, new with Align, and WECC is working through the process, gauging the resources needed to review and manage them. For that reason, the initial reviews of Attestations are taking more time.

How long is an Attestation applicable?

An active Attestation is applicable until you either rescind it as the Registered Entity, or WECC requests that you reaffirm it in Align, which initiates a review. A reaffirmation is triggered by a renewal date set by WECC upon approval, but it can also be requested by WECC at any time. Rescinded or disapproved Attestations are listed under the "Inactive Attestations" tab.

Overview

WECC conducts an Annual Self-Certification for Registered Entities to certify their compliance status with Reliability Standard Requirements as described in each entity's most recent Compliance Oversight Plan (COP) or Inherent Risk Assessment (IRA) report.

The General Section of the Self-Certification request in Align lists the following dates:

- Start date (First day the entity can submit its response in Align)
- Due date
- Monitoring period start date
- Monitoring period end date

The entity must submit the required Self-Certification response in Align for the monitoring period (i.e., from the monitoring period start date through the end date) **during the submittal period** (i.e., from the start date through the due date). If the entity does not submit the response by the due date, WECC may start the Non-Submittal Process outlined in the NERC Compliance Monitoring and Enforcement Program (CMEP) Attachment 1, "Process for Non-Submittal of Requested Data."

Please note that, while evidence is normally not required for the Annual Self-Certification response, the entity must keep evidence of its compliance status as stated in the NERC Rules of Procedure and the applicable Reliability Standard.

If you have questions about this Self-Certification or the Self-Certification process in general, contact one of the following WECC staff members:

- Duane Cooke at dcooke@wecc.org or 801-819-7639
- Angie Shapiro at ashapiro@wecc.org or 801-819-7622

If you have questions about a specific Standard Requirement or response, contact the Entity Risk Assessment and Registration (RAR) Team at RAR@wecc.org.

If you have technical questions about Align, contact Align@wecc.org.

Instructions

To complete the Self-Certification request in Align:

1. Complete the responses in the "Questions" section under "Self-Cert Assessment."*
   a. **Only complete responses for one set of questions assigned to one person (submitter).****
   b. For each question, selecting "Save Draft" saves your progress, which can still be edited. Selecting "Save" locks in your response, which cannot be edited.
   c. For any responses of "Non-Compliant," submit a Finding from the "Findings" section, or reference an existing Finding or Potential Noncompliance (PNC) in the comments for the Standard Requirement.
   d. For any responses of "Not Applicable" or "Do Not Own," submit an Attestation from the "Create Attestation" section.
2. If you need more time to complete the response, submit an Extension Request from the "Request for Extension" section.
3. Submit the overall Self-Certification response for Compliance Enforcement Authority (CEA) review from the "Action" section.
4. Refer to the Align training resources available on NERC's training site at https://training.nerc.net for Self-Certification how-to information.

* Align creates a separate "question" for each Standard Requirement in scope but may also for associated "parts." You can only indicate a compliance status (i.e., Compliant, Non-Compliant, Not-Applicable, or Do Not Own) at the Requirement level. You must, however, complete responses for each question, including any parts, before you can submit the overall Self-Certification response for WECC's review. Saving a question for a requirement or part, with or without a comment, changes the status to "Completed."

** Align creates a duplicate set of questions for each person with an "Align Registered Entity Submitter" role. You can only respond to questions assigned to you. To submit the overall response, the system now requires that the same submitter complete responses for an entire set of questions assigned to them.