

MARCH 21, 2023

RELIABILITY & SECURITY

Virtual Workshop





Align & SEL Experiences

March 21, 2023

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Agenda

- What to Expect with Align and SEL
- Comparing WECC's current audit process to using Align and SEL
 - Notice of Audit
 - RSAWs
 - Data Requests
 - Providing Evidence



What to Expect

- Align
 - All US audits starting after **July 1, 2023**
 - Evolution of training
 - Centralized System
 - Increase in quality and consistency
 - Automation of CMEP activity

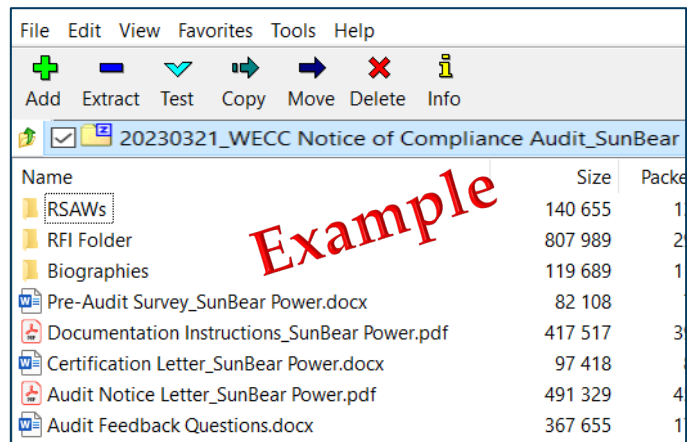
- SEL
 - Increased security

Comparing Audit Processes

Secure Workspace Process



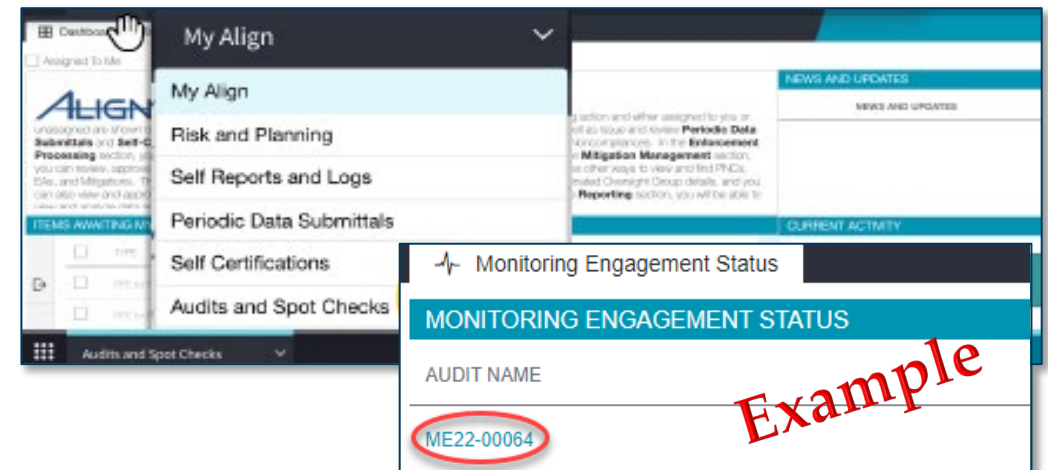
- Notice of Audit Package (NOAP) sent through Secure Workspace as a zipped folder



Align and SEL Process



- Audit Notice Package (ANP) accessed through Audit and Spot Checks drop down in Align

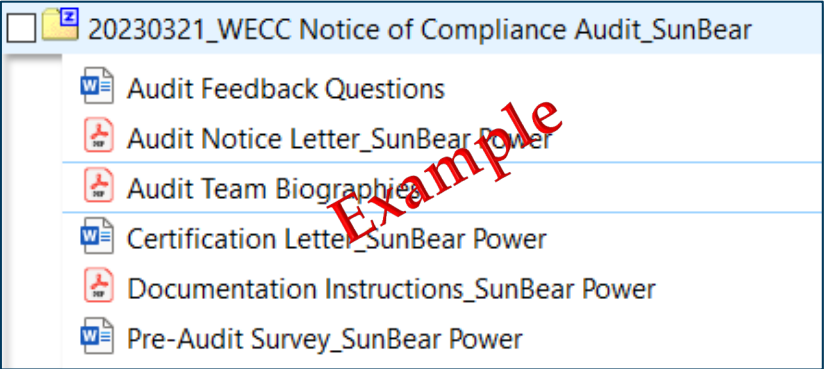


Comparing Audit Processes

NOAP



- NOAP Documents:** Audit Feedback Questions, Documentation Instructions, Audit Notice Letter, and Audit Team Biographies



ANP



- ANP Documents:** Attached for download on ANP Tab

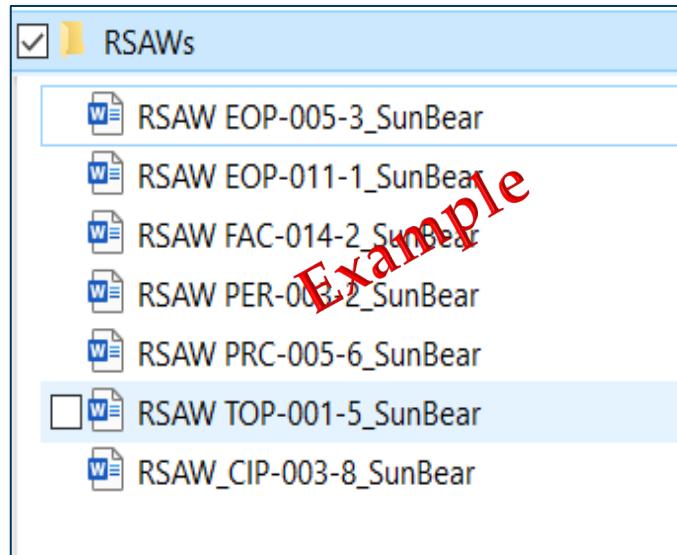
General Working Papers ANP Report			
ANP Documents			
AUDIT DOCUMENT ID	DOCUMENT NAME	DESCRIPTION	
AD22-00170	Audit Feedback Questions	WECC encourages the entity to submit its feedback regarding this compliance audit. Please use word document to collect feedback...	
AD23-00259	Biographies	A short biography and the recent employment history of the individual Audit Team members	
AD23-00260	Audit Notice Letter	This letter provides information to assist MID in preparing for the Audit.	
AD23-00261	Documentation Instructions	Reference material to outline and clarify providing supporting evidence files and completing Working Papers in Align and Excel...	

Comparing Audit Processes

NOAP



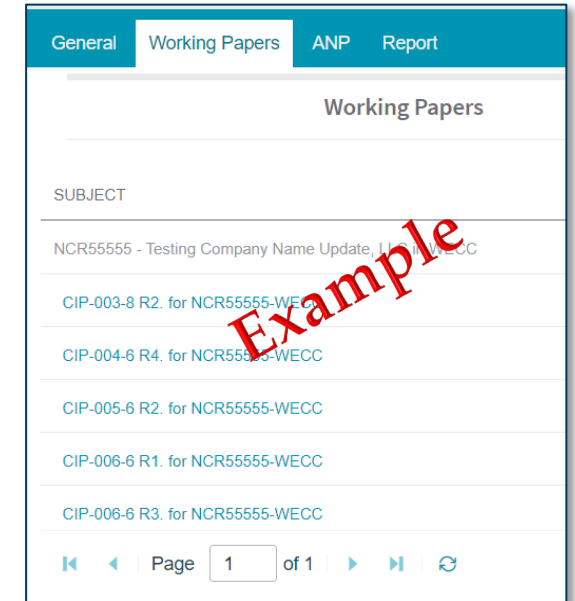
- **RSAWs Folder:**
Provides all RSAWs in scope of the audit



ANP



- **Working Papers:**
Tab in the Monitoring Engagement-Supplements RSAWs



Align Working Papers

Registered Entity Response (Required):

Describe, in narrative form, how you meet compliance with this requirement.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

CIP-002-5.1a R1.

Compliance Narrative:
Provide a brief explanation, in your own words, of how you comply with this Requirement or Part. References to supplied evidence, including links to the appropriate page, are recommended.

Registered Entity Evidence of Compliance

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

- Copy and Paste from RSAW into the Compliance Narrative box.
- Formatting is lost when pasting into Align.
- Do not embed any links in the narrative.


Comparing Audit Processes


NOAP




- NOAP RFI Folder

☒ RFI Folder

 CIP Evidence Request Tool User Guide v6

 CIP Evidence Request Tool v6_SunBear

 Protection_Systems_Maintenance_Summary_SunBear

Example

ANP



- Align ANP RFIs

General Working Papers ANP Report					
Audit Request for Information					
ID	CATEGORY	DUE DATE	STATUS	CEA COMMENTS	
RI22-000058	ANP	08/26/2022	CEA Review	Please open the attached files. The Certification must be printed on [ACRO]'s company letterhead and...	
RI22-000059	ANP	08/26/2022	CEA Review	CIP ERT and Instructions Please open the attached file. Upload the responses to the Secure Evidence...	
RI22-000060	ANP	08/26/2022	Registered Entity Processing	OPES Please open the attached file. Upload the responses to the Secure Evidence Locker (SEL) usi...	

Example

ANP SEL Reference IDs

CIP ERT

Detail Tab or Request ID	Standard	Requirement	Initial Evidence Request Required in RSAW and NERC Evidence Request Spreadsheet	Response Due Date	SEL Reference ID for Upload
CIP-002-R1-L1-01	CIP-002	R1	Provide the process that was implemented to identify each of the high impact and medium impact BES Cyber Systems, and each asset containing a low impact BES Cyber System. Additionally, provide evidence of the implementation of that process.	Reference Audit Notice Letter	WECC NCR55555 ME22-00064 ME22-00064 CIP-002-5.1a R1.

O&P Evidence Spreadsheet

Evidence Request (ER) ID	Standard	Registered Function	Requirement	Initial Evidence Request Required in RSAW and per WECC Audit Approach	SEL Reference ID for Upload
EOP-008-R1-ER-01	EOP-008-2	BA, RC, TOP	R1	Provide dated, current, and correct Operating Plan for backup functionality in electronic or hardcopy format.	WECC NCR055555 ME22-00064 ME22-00064 EOP-008-2 R1.

Comparing Audit Processes

Secure Workspace Process



- Data Requests (DR)

WECC Interview Request Form
Entity Name (ACRO) NCRXXXXX

File Name: ACRO_DR00_Interview
Issue Date: MM/DD/YYYY, hh:mm a.m./p.m. *TimeZone*
Team Members: names

Interview Request

Standard: standard
Requirements: requirements
Requested Time: MM/DD/YYYY, hh:mm a.m./p.m. – hh:mm am/pm *TimeZone*
Attendees list due two hours after conclusion of interview.

The WECC Audit Team requests:
<<text>>

Please submit the names and titles of interview attendees at the conclusion of the interview utilizing the table below.

Name	Title

Please use **ACRO_DR00_Response** as the file name for this data request response.
If you have any questions, contact **CPC** at 801-XXX-XXXX or **CPC email**.

Align and SEL Process



- Requests for Information (RFI)

Acknowledge Receipt

Instructions Upon opening this form please check the box below and click on update to acknowledge that you have received the Audit RFI.

Acknowledge Receipt of Audit RFI ☐


Request for Information

Requirement(s)	CIP-003-8 R2.	Respondent Comments	
Requestor	WECC Editor 1		
Requestor Comments	R1XX-XXXX_Standard_Req_Interview_TEST		
Requestor Attachments	R1XX-XXXX_Standard_Req_Interview_TEST.docx 109.14 KB		
Request Sent On	March 6, 2023		
Response Due By	April 5, 2023		

Secure Evidence Locker Instructions

[Update](#) [Close](#)

Align RFIs

 **Request for Information Form**
Entity Name (ACRO)
NCRXXXXX

RFI ID: RI-XX
Issue Date: MM/DD/YYYY
Team Members: names

Data Request

Standard: standard
Requirements: requirements
Due on or before: MM/DD/YYYY, hh:mm a.m./p.m. TimeZone
The WECC Audit Team requests:
<<text>>

Please upload to the Secure Evidence Locker using Reference Number WECC|NCRXXXXX|MEXX-XXXXX|MEXX-XXXXX|R1XX||

If you have any questions, contact CPC at 801-XXX-XXXX or CPC email.

Audit Request for Information		
ID	CATEGORY	DUE DATE
<u>RI22-000040</u>	ANP	05/12/2022
RI22-000041	ANP	05/12/2022
RI22-000042	ANP	05/12/2022
RI22-000043	ANP	05/12/2022
RI22-000044	ANP	05/24/2022
RI22-000045	Additional RFI	05/15/2022

- WECC will continue to attach an RFI document for download.
- RFI IDs are not sequential
- Once an RFI has been submitted it cannot be changed.
- Interview responses are now a bulleted attendees list in the Respondent Comments box in Align.

Comparing Audit Processes

Secure Workspace Process



- Upload evidence to WECC Secure Workspace



Align and SEL Process



- Upload evidence to Secure Evidence Locker (SEL)



NERC SEL Portal

Step 1

Secure Evidence Locker

Step 1 - Validation

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

XXXXXXXX

Validate

Step 2 - Upload Files

Paste Reference ID

Click "Validate" to add new evidence to your submission.

*Notify WECC after uploading to the SEL.

Step 2

Step 1 - Validation

Valid Reference ID

Region: RF

NCR: NCR00168

CMEP Activity: PDS2021-001336

Tags: PDS2021-001336

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, ARI, 7Z, 7ZX) as well as a number of files

If you experience any problems uploading evidence, contact your Region for assistance.

Upload

PDS Supporting Documentation-09-27-21.docx

Additional Information-09-27-21.docx

Step 3 - Submit Evidence

Verify all documents meet submission standards, then click "Submit" to complete.

Submit

Cancel

Step 3

Step 3 - Submit Evidence

Verify all documents meet submission standards, then click "Submit" to complete.

Submit

Cancel

Manifest email upon successful upload

From: do-not-reply@nerc.com <do-not-reply@nerc.com>

Sent: Monday, September 27, 2021 2:32 PM

To: seltesting@nerc.com

Subject: Submission Receipt 09/27/2021 14:32:19

Attached is the submission manifest receipt for your submission as of 09/27/2021 14:32:19.

File Name	NCR	CMEP Activity	SEL ID	SHA3-512 Signature
PDS Supporting Documentation-09-27-21.docx	NCR00168	PDS2021-001336	0902f2cf80065f9a	px49cKldVONOF
Additional Information-09-27-21.docx	NCR00168	PDS2021-001336	0902f2cf80065f9b	PKvMBv4sWRw

*Keep Manifests as your record of upload to the SEL.

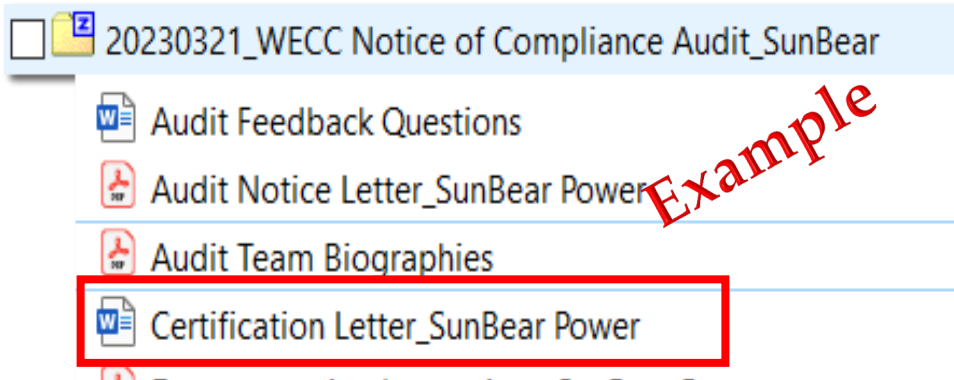
Note: Compressed files and executable files cannot be uploaded.

Comparing Audit Processes

NOAP



- **Certification Letter:** Signed letter by entity.



ANP



- **Align Certify:** Check box in Registered Entity Comments Section on the ANP Tab.

Best Practices

- Evidence Submittal
- Early DR/RFI Submission
- Detailed and Responsive
- Entity Preparedness

Closing Thoughts

- Similarities between current process and new process
- Stay tuned for upcoming training on Align audit processes
- All US audits starting after July 1, 2023, will use Align and SEL



Electric Reliability and Security for the West

www.wecc.org