

Unofficial Comment Form for the Draft Functional Model (v5) and the Functional Model Technical Document

Please **DO NOT** use this form. Please use the [electronic comment form](#) located at the link below to submit comments on the draft Functional Model (v5) and the Functional Model Technical Document (v5). Comments must be submitted by **August 19, 2008**. If you have questions please contact Stephen Crutchfield at stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

<http://www.nerc.com/page.php?cid=2|247|108>

Background Information:

The Functional Model Working Group began working on revisions for Version 5 of the Functional Model in November of 2008.

Scope for Functional Model (v5):

The Version 5 scope consisted of:

- Consideration of comments from Planning Committee regarding Demand Resources function and associated responsible entities
- Review of all planning functions and respective responsible entities
- Review of Interchange function and Interchange Authority as the responsible entity
- Review of Load Serving Entity and Distribution Provider
- Review of Terminology and Definitions for consistency with other NERC documents

Revision Summary of draft Functional Model (v5)

Planning Committee Comments:

Primarily the comments presented a proposal for adding a Demand Response Operations Function and a corresponding Demand Response Operator Functional Entity, and a Demand Response Ownership Function and corresponding Demand Response Owner Functional Entity.

The FMWG established a sub-group to review the proposal. The sub-group held several conference calls. Two options were considered. The sub-group issued a report (attached) to the FMWG with its findings, options considered, and the following recommendations;

1. That the two proposed DR functions and functional entities not be added to version 5 of the Functional Model at this time.
2. That NERC develop a high-level plan and approach to guide the future incorporation of Demand Response providers into NERC's standards development and compliance processes, as necessary and appropriate.
3. That this plan to accommodate Demand Response providers would include:
 - a. clarification of the process by which NERC evaluates existing and new standards requirements which may be applicable to DR providers and also identify who will be responsible for initiating the SAR to develop or change the NERC Standards.
 - b. identifying the particular functional entities, existing or new, who should be assigned the standards requirements applicable to the DR providers.

4. That NERC, in developing this plan, consider broadening the scope to include consideration of aggregators of small distributed generation resources. The FMWG is prepared to become involved in developing such a plan.

Planning Functions Review

The FMWG established a sub-group to review all the planning functions and responsibilities. The sub-group held several conference calls and meetings. Three options were considered. The sub-group decided to primarily leave the Functional Model as is, but “clean up” the Resource Planning function and provide clarification of the wide-perspective role of the Planning Coordinator.

Interchange Authority Review

The FMWG agreed that the Interchange Authority should be renamed the Interchange Coordinator. Also sections of the model pertaining to Interchange were revised to achieve consistency with terminology used in NERC Reliability Standards. The FMWG agreed to interface with the new INT Standards Drafting Team to ensure further consistency.

Load Serving Entity and Distribution Provider Review

The FMWG revised these sections of the model to take into consideration comments made in the Version 4 posting.

Terminology and Definitions Review

As a general matter, the Functional Model and the NERC Glossary, NERC Rules of Procedure, and NERC reliability standards should use consistent terminology. Entity Terminology, Entity Names, and Entity Definitions were addressed. The FMWG plans to submit a SAR to effect these recommendations.

Entity Terminology: The term “responsible entity” in the Model was changed to “functional entity”. The FMWG recommends:

- The ROP and Glossary should be revised as necessary to consistently use the term “functional entity” when the reference is to the class of entity (e.g., BA), that is, when the term is used in the same sense as the Functional Model.
- The ROP and Glossary be revised as necessary to consistently use the terms “responsible entity” and “registered entity” when the reference is to a specific organization regarding its responsibility or registration, respectively.

Entity Names: The Model changed the name Interchange Authority to Interchange Coordinator. This usage should be followed in all references in NERC documents.

Entity Definitions: The Model has been revised to define the various *functional entities*, not the *functions* as at present, consistent with the approach used in the Glossary and standards.

- The functional entity definitions in the Model followed the Glossary in many cases. There are some definitions in the Glossary that should be changed to what is contained in proposed Version 5.
- The form of the definitions has been made uniform.

Revision Summary of draft Functional Model Technical Document (v5)

Version 5 includes the following changes from Version 4:

Entity name

- Interchange Authority has been changed to Interchange Coordinator. Also incorporated are the terms Arranged and Confirmed Interchange to be consistent with terminology used in the “INT” standards.

Terminology

The term “responsible entity” in the Model has been changed to “functional entity”.

- The usage of “responsible” in Version 4, derived from an earlier version of the Model. Version 4 clarified that the Model is limited to describing the performance of tasks, but not compliance aspects such as responsibility for such performance. Version 5 takes this clarification one step further by replacing the term “responsible” in the Model.
- The Model uses the term functional entity to apply to a class of entity, such as a Balancing Authority, and makes no reference to the specific organizations that register as functional entities.
- Reliability is best served if there is consistency of definitions within all NERC documents. These documents include, but are not limited to, the Functional Model, the NERC Rules of Procedure and Glossary of Terms.

Entity definitions

- The Model has been revised to define the various functional entities, not the functions, consistent with the approach used in the Glossary and standards.
- The functional entity definitions have been revised.
- The form of the definitions is uniform, with each definition beginning: “The functional entity that...”.
- Each definition is a single sentence, limited to a simple statement of the nature of the tasks performed. As a result, some of the current descriptive wording in Version 4 or the Glossary definitions have been removed in the Version 5 definitions.

Future Development Plan:

Anticipated Actions	Anticipated Date
1. Post Functional Model (v5) and Functional Model Technical Document (v5) for 30 day comment period.	July-August, 2009
2. Host Industry WebEx for version 5 revisions.	August, 2009
3. Respond to comments and revise documents as necessary.	August, 2009
4. Hold Functional Model v5 workshop to present final revisions to the industry.	September 14, 2009
5. Request approval from the OC, OC and CIPS on the technical content of version 5 of the Functional Model and the Functional Model Technical Document.	September 15–16, 2009
6. Request approval from the SC to post version 5 of the Functional Model and the Functional Model Technical Document as reference documents.	October 7–8, 2009

The FMWG would like to receive industry comments on the draft Functional Model (v5) and the Functional Model Technical Document (v5). Accordingly, we request that you submit your comments by **August 18, 2009**.

1. Do you agree with the proposed revisions to the Interchange function and Interchange Coordinator responsible entity in version 5 of the Functional Model? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments: N/A

2. Do you agree with the proposed revisions to clarify the Planning Reliability function and the Planning Coordinator entity in version 5 of the Functional Model? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments:

A. For the "Function - Planning Reliability", replace the title of "Planning Reliability" with "Planning Coordination" to be more consistent with the associated functional entity name, Planning Coordinator.

B. For the "Functional Entity - Planning Coordinator":

1. Remove "protection systems" from the definition. Protection systems are not mentioned anywhere in the main document or technical document with respect to the Planning Coordinator functional entity or function. The coordination of protection systems are already covered by the Transmission Planner functional entity.

2. Add "Resource Planners" to Item 9 (provide plans to affected parties).

3. Do you agree with the proposed revisions to clarify the Transmission Planning Reliability function and the Transmission Planner entity in version 5 of the Functional Model? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments:

For the "Function - Transmission Planning":

A. Add a new item "12: Provides its expansion transmission plans to affected Reliability Assurers, Transmission Planners, Planning Coordinators, Transmission Owners, Transmission Operators, Resource Planners, and Transmission Service Providers."

B. Remove the references to developing, documenting, reporting, and monitoring resource plans. These are Resource Planning functions.

For the "Functional Entity – Transmission Planner:

A. Add a new item "8: Provides its expansion transmission plans to affected Reliability Assurers, Transmission Planners, Planning Coordinators, Transmission Owners, Transmission Operators, Resource Planners, and Transmission Service Providers."

B. Remove the references to developing, documenting, reporting, and monitoring resource plans. These are Resource Planner relationships with other functional entities.

4. Do you agree with the proposed revisions to clarify the Resource Planning function and the Resource Planner entity in version 5 of the Functional Model? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments: N/A

5. Do you agree with the proposed terminology revisions in version 5 of the Functional Model (i.e. Entity Terminology, Entity Names and Entity Definitions, as identified in the Revision Summary of this document)? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments:

The MRO NSRS doesn't believe that the terminology revisions will deliver the clarity that the FMWG intends. In the previous version of the Functional Model, when the term Responsible Entity was used, it was clear that if a company, any company, registered as a certain entity, they were accountable for all standards where this function was assigned but weren't necessary responsible for every assigned requirement.

6. Do you have any other comments regarding the proposed revisions to the Functional Model? If yes, please provide comments in support of your answer in the comment area.

Yes

No

Comments:

On page 8 of the redline document, it is stated that the Model has been refocused on Tasks versus responsibility and that discussions associated with responsibility have been removed. The MRO NSRS disagrees due to the fact that Functional Entities are still responsible for Tasks so the discussion of responsibility has not been removed. MRO NSRS agrees that certain Functions perform certain Tasks but this does not remove an individual organization's responsibility for performing the Task if they have registered for the function that is responsible for the Task. The function is still responsible but the tasks could be covered or shared by multiple responsible entities.

The diagram on page 26 of the redline document showing the RTO as both the RC and the TOP and delegating tasks to the TO is not consistent with the explanation of the TOP/TO relationship described on page 25 in the 4th paragraph with respect to delegation.

In paragraph 6 on page 43 of the redline document, there is discussion of assigning the LSE identification of loads for curtailment. It goes on to discuss loads subject to voluntary curtailment and loads that are critical that should be excluded from non-voluntary curtailment. While this is correct, the transition between voluntary curtailment and non-voluntary curtailment should be revised so that it is smoother.

In section 15 where the Compliance Enforcement Authority is described, it would read better if it was revised to say:

NERC is the Compliance Enforcement Authority. NERC has overall responsibility for monitoring compliance with Reliability Standards. The Reliability Assurers (formerly referenced to as "Regional Entities") assists NERC and have a major role in the actual performance of the monitoring under their delegated agreements with NERC.

The MRO NSRS has two suggestions for the glossary: 1) put the entities in alphabetical order and 2) in the previous definition of Planning Coordinator the planning horizon timeframe of one year and beyond was used. In the new definition, the one year and beyond timeframe has been removed. This appears to remove the timeframe connection between the Planning Coordinator and the Transmission Planner.

For the “Technical Document, Transmission Planner”, revise “long-term” plan references to be “near-term and longer-term” plans. The TPL reliability standards refer to “near-term” and “longer-term” horizons and do not use the terminology of “long-term” plans.

For the “Introduction”, replace “The Model is a guideline for the development of standards and their applicability.” with “The Model is a guideline for the development of the NERC Compliance Registry Criteria, which in turn should guide the development of new and revised standards and their applicability.” For example, in the NERC Reliability Standard NUC-001, what is a “transmission entity”?

For the “Function - Transmission Ownership”, add a new item “6: Implements applicable Transmission Planner and Planning Coordinator transmission expansion plans.”

For the “Function - Transmission Owner”, add a new item “12: Communicates which transmission expansion plans it intends to implement to any applicable Transmission Planners and Planning Coordinators.” A Transmission Owner constructs and maintains transmission facilities so it would be reasonable to associate the responsibility of implementing a transmission plan with this functional entity. It should be noted that a Transmission Owner may need to enter into an agreement which indicates which entity will implement certain portions of the transmission plan.

For the “Function – Distribution”, revise item 4 to “Provide and implement automatic voltage and frequency load-shed capability as needed, including end-use load connected to the transmission system.

For the “Technical Document, Planning Coordinator”, remove the text that a Planning Coordinator be “possibly the Regional Entity itself”. This guide should not purvey the concept of a Regional Entity registering as a functional entity with itself and then monitoring itself.

Considering the terminology changes in Version 5 of the Technical Document, the comment column in the “Terminology Changes” Table should call for a change in the Statement of Compliance Registry Criteria for any applicable functional entities which may have been modified, reassigned or redefined recently within the industry by FERC, NERC, other stakeholders, etc.

7. Do you agree with the proposed revisions to the Interchange function and Interchange Coordinator responsible entity in version 5 of the Functional Model Technical Document? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments: The MRO NSRS believes this question is a duplicate of #1.

8. Do you agree with the proposed revisions to clarify the Planning Reliability function and the Planning Coordinator entity in version 5 of the Functional Model Technical Document? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments: The MRO NSRS believes this question is a duplicate of #2

9. Do you agree with the proposed revisions to clarify the Transmission Planning Reliability function and the Transmission Planner entity in version 5 of the Functional Model Technical Document? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments: The MRO NSRS believes this question is a duplicate of #3

10. Do you agree with the proposed revisions to clarify the Resource Planning function and the Resource Planner entity in version 5 of the Functional Model Technical Document? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments: The MRO NSRS believes this question is a duplicate of #4

11. Do you agree with the proposed terminology revisions (i.e. Entity Terminology, Entity Names and Entity Definitions, as identified in the Revision Summary of this document) in version 5 of the Functional Model Technical Document, and the proposal to achieve consistency in the terms used in the Function Model and other NERC documents? If no, please provide comments in support of your answer in the comment area.

Yes

No

Comments: The MRO NSRS believes this question is a duplicate of #5

12. Do you have any other comments regarding the proposed revisions to the Functional Model Technical Document (v5)? If yes, please provide comments in support of your answer in the comment area.

Yes

No

Comments: The MRO NSRS believes this question is a duplicate of #6