

Unofficial Comment Form for Proposed Glossary Revisions – Functional Model Working Group

Please DO NOT use this form. Please use the [electronic form](#) located at the link below to submit comments on the proposed SAR for Proposed Glossary Revisions — Functional Model Working Group. Comments must be submitted by **February 22, 2009**. If you have questions please contact Stephen Crutchfield by email at Stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

Background:

The Functional Model Working Group has completed its proposed revisions to the Functional Model Version 5, which included revisions to the names and definitions for various functional entities. These revisions have been approved by the NERC Operating, Planning, Critical Infrastructure Protection and Standards Committees. Version 5 contains terminology changes intended to improve consistency between the Model and the NERC Glossary of Terms (see Functional Model Technical Document Version 5, Section II, Part 11).

The FMWG has received many comments and questions from stakeholders concerning the differences in definitions between the Functional Model and the NERC Glossary of Terms. This SAR is designed to address these comments and make the definitions of functional entities consistent between the two documents.

Please review the SAR and then answer the following questions.

1. Do you agree with the proposed revision to the NERC Glossary of Terms for “Balancing Authority”? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the proposed revision to the NERC Glossary of Terms for “Compliance Monitor”? If not, please explain in the comment area.

Yes

No

Comments:

3. Do you agree with the proposed revision to the NERC Glossary of Terms for “Distribution Provider”? If not, please explain in the comment area.

Yes

No

Comments:

Thanks for the clarification but we are wondering how will the Statement of Compliance registry Criteria be changed? Since the revised criterion was not appended to this SAR it's difficult to see the benefit of making these revisions to the Distribution Provider

definition. It appears to be just another definition among many. Failure to reconcile the terms with the NERC Glossary of Terms and the Statement of Compliance Registry Criteria will result in additional requests for interpretations, inconsistent enforcement across NERC and increase rule making by enforcement instead of making the standard through the standard development process.

We suggest rewording of the Distribution Provider definition to, "The functional entity that provides facilities that interconnect an end-use customer load to the Bulk Electric System (BES) for the transfer of electrical energy to the end-use customer."

4. Do you agree with the proposed revision to the NERC Glossary of Terms for "Generator Operator"? If not, please explain in the comment area.

Yes

No

Comments:

5. Do you agree with the proposed revision to the NERC Glossary of Terms for "Generator Owner"? If not, please explain in the comment area.

Yes

No

Comments:

6. Do you agree with the proposed revision to the NERC Glossary of Terms to rename "Interconnected Operations Services" to "Reliability-related Services"? If not, please explain in the comment area.

Yes

No

Comments: It's difficult to provide constructive comments when the purpose of the change is not known.

7. Do you agree with the proposed revision to the NERC Glossary of Terms for "Load-Serving Entity"? If not, please explain in the comment area.

Yes

No

Comments:

8. Do you agree with the proposed revision to the NERC Glossary of Terms for "Planning Authority" / "Planning Coordinator"? If not, please explain in the comment area.

Yes

No

Comments: Thanks for the clarification but I'm wondering how will the Statement of Compliance Registry Criteria be changed? Since the revised criterion was not appended to this SAR it's difficult to see the benefit of making these revisions to this definition. It appears to be just another definition among many. Failure to reconcile the terms with the NERC Glossary of Terms and the Statement of Compliance Registry Criteria will

result in additional requests for interpretations, inconsistent enforcement across NERC and increase rule making by enforcement instead of making the standard through the standard development process.

NERC should be encouraged to make any changes in the Statement of Compliance Registry Criteria to be consistent with the new definition by the time these changes in the glossary would become effective.

9. Do you agree with the proposed revision to the NERC Glossary of Terms for "Purchasing-Selling Entity"? If not, please explain in the comment area.

Yes

No

Comments:

10. Do you agree with the proposed revision to the NERC Glossary of Terms for "Reliability Coordinator"? If not, please explain in the comment area.

Yes

No

Comments: The functional entity that maintains the Real-time operating reliability of the Bulk Electric System within its Reliability Coordinator Area. See comment #17 below.

11. Do you agree with the proposed revision to the NERC Glossary of Terms for "Resource Planner"? If not, please explain in the comment area.

Yes

No

Comments:

12. Do you agree with the proposed revision to the NERC Glossary of Terms for "Transmission Operator"? If not, please explain in the comment area.

Yes

No

Comments: We like the removal of the word local since it's subjective.

13. Do you agree with the proposed revision to the NERC Glossary of Terms for "Transmission Owner"? If not, please explain in the comment area.

Yes

No

Comments:

14. Do you agree with the proposed revision to the NERC Glossary of Terms for "Transmission Planner"? If not, please explain in the comment area.

Yes

No

Comments: See comment #17 below.

15. Do you agree with the proposed revision to the NERC Glossary of Terms for "Transmission Service Provider"? If not, please explain in the comment area.

Yes

No

Comments:

16. Do you agree with the implementation plan for the proposed changes to the glossary? If not, please identify in the comment area.

Yes

No

Comments: We are okay with the implementation plan but how will these revisions impact registration? Are there any entities currently registered as a Planning Coordinator or an Interchange Coordinator? Would the registration change be accomplished by just simply swapping titles?

17. If you have any other comments on the SAR that you haven't already provided in response to the previous questions, please provide them here.

Comments: We notice that several definitions are vague as to what area a given function is responsible for; we suggest that the scope be more specific such as a designated area. Such as a transmission planner is responsible for planning its Transmission Planner Area.