

Consideration of Comments on Proposed Glossary Revisions – Functional Model (Project 2010-08)

The Functional Model Working Group thanks all commenters who submitted comments on the proposed SAR for Proposed Glossary Revisions — Functional Model. The SAR was posted for a 30-day public comment period from January 22, 2010 through February 22, 2010. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 17 sets of comments, including comments from more than 60 different people from over 30 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/filez/standards/Project2010-08_FM_Glossary_Revisions.html

The changes proposed in the SAR were accepted by a clear majority of respondents in all cases. Of the changes recommended by respondents, many were accepted by the FMWG - typically the addition of words or phrases to better describe the tasks of the functional entity.

In addition, the FMWG agreed it was appropriate to remove the concept of area from the definitions of the three planning entities, and to remove references in definitions to a specific time frame ("generally one year and beyond").

In a number of cases, however, respondents sought a level of detail that the FMWG judged inappropriate for a definition, noting that if the specification of such detail is determined to be appropriate, it can be developed in standards or other NERC processes.

A summary of the final recommendations of the FMWG, and the rationale for changes from the definitions in the SAR, are given in the accompanying summary document.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President of Standards and Training, Herb Schrayshuen, at 404 446 2563 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual:
http://www.nerc.com/files/Appendix_3A_Standard_Processes_Manual_Rev%201_20110825.pdf.

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

		Commenter	Organization	Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
1.	Group	Guy Zito	Northeast Power Coordinating Council												X
Additional Member		Additional Organization		Region		Segment Selection									
1.	Alan Adamson	New York State Reliability Council, LLC		NPCC		10									
2.	Gregory Campoli	New York Independent System Operator		NPCC		2									
3.	Roger Champagne	Hydro-Quebec TransEnergie		NPCC		2									
4.	Kurtis Chong	Independent Electricity System Operator		NPCC		2									
5.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC		1									
6.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.		NPCC		1									
7.	Brian D. Evans-Mongeon	Utility Services		NPCC		8									
8.	Mike Garton	Dominion Resources Services, Inc.		NPCC		5									
9.	Brian L. Gooder	Ontario Power Generation Incorporated		NPCC		5									
10.	Kathleen Goodman	ISO - New England		NPCC		2									
11.	David Kiguel	Hydro One Networks Inc.		NPCC		1									
12.	Michael R. Lombardi	Notheast Utilities		NPCC		1									
13.	Randy MacDonald	New Brunswick System Operator		NPCC		2									
14.	Greg Mason	Dynergy Generation		NPCC		5									

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	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
15.	Bruce Metruck	New York Power Authority	NPCC								6			
16.	Chris Orzel	FPL Energy/NextEra Energy	NPCC								5			
17.	Robert Pellegrini	The United Illuminating Company	NPCC								1			
18.	Saurabh Saksena	National Grid	NPCC								1			
19.	Michael Schiavone	National Grid	NPCC								1			
20.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC								3			
21.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC								10			
22.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC								10			
2.	Group	Steve Alexanderson	PNGC Cowlitz Central Lincoln comment group			X								
Additional Member		Additional Organization		Region						Segment Selection				
1.	Russ Noble	Cowlitz PUD	WECC								3			
2.	Margaret Ryan	The 11 DP/LSE members of PNGC	WECC								3			
3.	Group	Louis Slade	Dominion	X		X		X	X					
Additional Member		Additional Organization		Region						Segment Selection				
1.	Jalal Babik	Electric Market Policy	NPCC								3			
2.	Mike Garton	Electric Market Policy	MRO								5			
3.	Joe Finnegan	Electric Transmission	SERC								1			
4.	Jeff Jones	Dominion Retail	RFC								6			
4.	Group	Sam Ciccone	FirstEnergy	X		X	X	X	X					
Additional Member		Additional Organization		Region						Segment Selection				
1.	Dave Folk	FE	RFC								1, 3, 4, 5, 6			
2.	Doug Hohlbaugh	FE	RFC								1, 3, 4, 5, 6			
5.	Group	Carol Gerou	MRO's NERC Standards Review Subcommittee											X
Additional Member		Additional Organization		Region						Segment Selection				

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	Commenter	Organization	Industry Segment														
			1	2	3	4	5	6	7	8	9	10					
1.	Chuck Lawrence	American Transmission Company	MRO									1					
2.	Tom Webb	WPS Corporation	MRO									3, 4, 5, 6					
3.	Terry Bilke	Midwest ISO Inc.	MRO									2					
4.	Jodi Jenson	Western Area Power Administration	MRO									1, 6					
5.	Ken Goldsmith	Alliant Energy	MRO									4					
6.	Dave Rudolph	Basin Electric Power Cooperative	MRO									1, 3, 5, 6					
7.	Eric Ruskamp	Lincoln Electric System	MRO									1, 3, 5, 6					
8.	Joseph Knight	Great River Energy	MRO									1, 3, 5, 6					
9.	Joe DePoorter	Madison Gas & Electric	MRO									3, 4, 5, 6					
10.	Scott Nickels	Rochester Public Utilities Address	MRO									4					
11.	Terry Harbour	MidAmerican Energy Company	MRO									1, 3, 5, 6					
6.	Group	Ben Li	IRC Standards Review Committee		X												
Additional Member		Additional Organization		Region				Segment Selection									
1.	Bill Phillips	MISO	MRO									2					
2.	James Castle	NYISO	NPCC									2					
3.	Mark Thompson	AESO	WECC									2					
4.	Charles Yeung	SPP	SPP									2					
5.	Matt Goldberg	ISO-NE	NPCC									2					
6.	Lourdes Estrada-Salinero	CAISO	WECC									2					
7.	Steve Myers	ERCOT	ERCOT									2					
8.	Patrick Brown	PJM	RFC									2					
7.	Individual	Sandra Shaffer	PacifiCorp	X		X		X	X								
8.	Individual	Brent Ingebrigtsen	E.ON U.S.	X		X		X	X								
9.	Individual	Harry Maloney	City of Vineland New Jersey			X		X					X				
10.	Individual	Ray Phillips	Alabama Municipal Electric Authority				X										

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		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
11.	Individual	Martin Bauer	US Bureau of Reclamation					X						
12.	Individual	Gregory Miller	BGE	X										
13.	Individual	Kathleen Goodman	ISO New England Inc.		X									
14.	Individual	Richard Kafka	Pepco Holdings, Inc.	X		X		X	X					
15.	Individual	James Sharpe	South Carolina Electric and Gas	X		X		X	X					
16.	Individual	Laura Lee	Duke Energy	X		X		X	X					
17.	Individual	Dan Rochester	Independent Electricity System Operator		X									

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.

Summary Consideration: Most of the commenters agreed with the proposed changes. Some commenters suggested minor wording changes. Where the FMWG agreed, it adopted the proposed changes, resulting in the following revised definition for Balancing Authority:

*“The functional entity that integrates resource plans ahead of time, maintains generation-load-interchange balance within a Balancing Authority Area, and contributes to **the regulation of** Interconnection frequency in real time.”*

Organization	Yes or No	Question 1 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
Duke Energy	No	The original “supports” is a better characterization than “contributes to”. There doesn’t seem to be a reason to change “load-interchange-generation balance” to “generation-load-interchange balance.”
<p>Response: Thank you for your comment. As indicated in the IESO comment below on Question 1, the FMWG agreed to add the phrase “the regulation of” after “contributes to.” The FMWG believes that the change from “load-interchange-generation balance” to “generation-load-interchange balance” makes the definition clearer and less cumbersome.</p>		
E.ON U.S.	No	The definition should make explicit whether it refers to real power only or includes reactive.
<p>Response: Thank you for your comment. The SAR was intentionally limited in scope to focus on achieving consistency in the definition of</p>		

Organization	Yes or No	Question 1 Comment
		<p>functional entities as they appear in different NERC documents. None of the current definitions of BA specifies the inclusion or exclusion of Reactive Power; accordingly, the definition proposed in the SAR does not specify it. It is noted that the BA has a role in reliability-related services, as indicated in the Balancing function's Tasks 11 and 12:</p> <p>11. Determine needs for reliability-related services.</p> <p>12. Deploy reliability-related services.</p> <p>The FMWG will consider your comment further when it develops Version 6 of the model.</p>
Independent Electricity System Operator	No	We propose inserting “the maintenance of” after “contributes to”.
<p>Response: Thank you for your comment. The FMWG agrees with the need to clarify the BA’s role respecting frequency, but believes “the regulation of” is preferable, and has made this change. The term “maintenance” has the potential for confusion with maintenance as it applies to facilities.</p>		
Pepco Holdings, Inc.	No	"contributes to Interconnection frequency" is an odd term. "contributes to maintaining Interconnection frequency" would be better.
<p>Response: Thank you for your comment. The FMWG agrees with the need to clarify the BA’s role respecting frequency, but believes “the regulation of” is preferable, and has made this change. The phrase “the regulation of” has been added after “contributes to.”</p>		
PNGC Cowlitz Central Lincoln comment group	No	“contributes to” is not a valid substitute for “supports.” Perhaps the drafters intended to say “contributes to interconnection frequency control in real time.” Contributing further to a frequency that already exceeds the threshold is not a good thing. Contributing to the control of that frequency would.
<p>Response: Thank you for your comment. The FMWG agrees with the need to clarify the BA’s role respecting frequency, but believes “the regulation of” is preferable, and has made this change. The phrase “the regulation of” has been added after “contributes to.”</p>		
US Bureau of Reclamation	No	There appears to be an overlap between the Planning Authority planning window and that of the Balancing Authority. This will tend to cause a conflict when the planning study results in differences. It may be appropriate to clarify that for the Balancing Authority the ahead of time period is "(generally up to one year)". This would ensure that the time period specific for the

Organization	Yes or No	Question 1 Comment
		Planning Authority "(generally one year and beyond)" does not overlap. The time period for the Planning Authority is also addressed later.
<p>Response: Thank you for your comment. While it recognizes your concern, the FMWG believes the proposed definition for BA is adequate in this regard. The FMWG discussed the phrase “generally one year and beyond” (specified for the Planning Coordinator) and debated whether a complementary specification would be appropriate for the BA. The FMWG concluded that the time frame for assessments performed by certain functional entities (BAs, Planning Coordinators, Transmission Planners, etc.) varies from one organization to another, and there can be overlapping periods among these assessments for reliability need. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. Accordingly, the phrase “generally one year and beyond” was removed from the proposed definition of Planning Coordinator.</p> <p>If it is resolved that functional entities require a more specific time frame within which to perform their tasks, this should be specified in the reliability standards, as appropriate.</p>		
Alabama Municipal Electric Authority	Yes	
City of Vineland New Jersey	Yes	
Dominion	Yes	
FirstEnergy	Yes	The term "real time" in the definition should be capitalized.
<p>Response: Thank you for your comment. The FMWG disagrees. When "real time" is used as a noun in the body of definitions in the glossary or in standards, it is most commonly in lowercase. The FMWG has adopted this convention.</p>		
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
MRO's NERC Standards Review Subcommittee	Yes	N/A
Northeast Power Coordinating Council	Yes	

Organization	Yes or No	Question 1 Comment
PacifiCorp	Yes	
South Carolina Electric and Gas	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters suggested minor wording changes. Where the FMWG agreed, it adopted the proposed changes, resulting in the following revised definition for Compliance Enforcement Authority:

"The functional entity that monitors, reviews, and ensures compliance with reliability standards and administers sanctions or penalties for non-compliance with reliability standards."

One Commenter suggested that the term Compliance Monitor be kept in the glossary with a reference to the Compliance Enforcement Authority. The FMWG agrees, and suggests the following: “Compliance Monitor: See Compliance Enforcement Authority.”

Organization	Yes or No	Question 2 Comment
Alabama Municipal Electric Authority	No	I suggest you change "for non-compliance to the..." to "for non-compliance of the..."
<p>Response: Thank you for your comment. The FMWG notes that the Rules of Procedure refer to "non-compliance <i>with</i>" reliability standards. The FMWG has revised the definition accordingly, to "The functional entity that monitors, reviews, and ensures compliance with reliability standards and administers sanctions or penalties for non-compliance with reliability standards"</p>		
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms and the NERC Functional Model.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the</p>		

Organization	Yes or No	Question 2 Comment
consistency you reference.		
PacifiCorp	No	supports changing the term from “Compliance Monitor” to “Compliance Enforcement Authority.” However, PacifiCorp does not believe it is appropriate to refer to the Compliance Enforcement Authority as a “functional entity” because the Compliance Enforcement Authority is not a owner, user, or operator of the Bulk Power System and is not a functional entity as that term is conceived in the NERC Functional Model.
<p>Response: Thank you for your comment. The FMWG disagrees that a functional entity must be an owner, user, or operator to qualify as a functional entity. Rather, the Functional Model includes all classes of entities that perform functions having an impact on BES reliability. For example, standards development is a function and the standards developer is the functional entity. It is not an owner, user, or operator, but its tasks have an impact on BES reliability. The Compliance Enforcement Authority is also judged to have such an impact.</p>		
City of Vineland New Jersey	Yes	
Dominion	Yes	
Duke Energy	Yes	
FirstEnergy	Yes	Many existing standards will still say "Compliance Monitor" so we suggest keeping Compliance Monitor in the glossary and state "See Compliance Enforcement Authority".
<p>Response: Thank you for your comment. The FMWG agrees with your suggestion to keep Compliance Monitor in the glossary and state “See Compliance Enforcement Authority.”</p>		
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
MRO's NERC Standards Review Subcommittee	Yes	N/A

Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	Yes	
Pepco Holdings, Inc.	Yes	I assume you mean Compliance Enforcement Authority
<p>Response: Thank you for your comment. Yes, the proposed change includes renaming “Compliance Monitor” to “Compliance Enforcement Authority.”</p>		
PNGC Cowlitz Central Lincoln comment group	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters suggested that the Distribution Provider also operates the distribution system and that the word “operate” should be reinstated. The FMWG agrees, and has changed the definition to:

*“The functional entity that provides **and operates** facilities that interconnect end-use customer load and the electric system for the transfer of electrical energy to the end-use customer.”*

Organization	Yes or No	Question 3 Comment
Alabama Municipal Electric Authority	No	The "to the end-use customer." appears to be redundant.
<p>Response: Thank you for your comment. The FMWG believes the proposed definition is appropriate. The second occurrence of "end-use customer" states the purpose of the connecting facilities, and distinguishes the DP from other types of providers, such as one providing communications services.</p>		
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
City of Vineland New Jersey	No	I can only agree if the new definitions do not extend the BES requirements into the lower distribution system voltages other than the existing requirements IE Underfrequency load shedding.
<p>Response: Thank you for your comment. The Functional Model provides a list of the tasks that are generally performed to manage reliability. The Model groups the reliability tasks in a logical manner, and describes the actions and relationship between functional entities. The Model does not attempt to stipulate any definitive boundaries between a transmission system and a distribution system. As such, the proposed definition in the SAR does not extend BES requirements.</p>		

Organization	Yes or No	Question 3 Comment
Dominion	No	The last sentence in the original definition sentence should be maintained either in the definition of the term or as a footnote to the definition. The sentence reads “Thus, the Distribution Provider is not defined by a specific voltage, but rather as performing the Distribution function at any voltage.”
<p>Response: Thank you for your comment. The FMWG agrees with the substance of the comment, but believes this is reflected adequately in the proposed definition – in particular, by the use of the term "electric system," which can apply to facilities at either transmission or distribution voltages.</p> <p>In addition, the FMWG has attempted to maintain a uniform style for all of the functional entity definitions, in part by limiting the definitions to one sentence and excluding explanatory material. The deleted sentence is explanatory; and while it may add clarity, it need not be included in the definition.</p>		
Duke Energy	No	The concept of operating the distribution system has been removed from the definition. This could cause confusion about the responsibility to provide real-time, operational distribution data (such as firm load losses and associated number of customers) to the BA or TOP.
<p>Response: Thank you for your comment. The FMWG agrees with the suggested change, and has added the word “operates” to the definition.</p>		
E.ON U.S.	No	Suggested language: The functional entity that provides and operates facilities that interconnect end-use customer load and the bulk electric system for the transfer of electrical energy to the end-use customer
<p>Response: Thank you for your comment. The FMWG agrees with the suggested change, and has added the word “operates” to the definition.</p>		
MRO's NERC Standards Review Subcommittee	No	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

Organization	Yes or No	Question 3 Comment
		electrical energy to the end-use customer.”
<p>Response: Thank you for your comment. The Statement of Compliance Registry Criteria [Rev. 5.0, (October 16, 2008)] can be found at http://www.nerc.com/files/Statement_Compliance_Registry_Criteria-V5-0.pdf. The function type definitions given on Pages 4-6 in this document are the same as the functional entity definitions given in the NERC Glossary, except for a few minor (editorial) differences. The definitions that result from the present SAR will, therefore, be used to update the table of definitions in the Statement of Compliance Registry Criteria. Because the changes to definitions introduced in this SAR do not introduce substantive changes, the detailed criteria in the Statement of Compliance Registry Criteria will not be affected.</p>		
PNGC Cowlitz Central Lincoln comment group	No	The second removed sentence adds some clarity missing from the first sentence alone. Regardless of this statement and the similar one in the functional model, there continue to be DSI customers with loads above the registry criteria threshold with no registered DPs for those loads.
<p>Response: Thank you for your comment. The FMWG has attempted to maintain a uniform style for all of the functional entity definitions, in part by limiting the definitions to one sentence and excluding explanatory material. The deleted sentence is explanatory; while it may add clarity, it need not be included in the definition.</p> <p>Any issue with registered entities is outside the scope of this SAR and should be addressed as a registration matter.</p>		
FirstEnergy	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	

Organization	Yes or No	Question 3 Comment
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters suggested that not all generators produce reliability-related services; and, therefore, the proposed definition may result in some generators having to de-register. The FMWG recognizes that not all generators produce reliability-related services, but believes that the proposed definition for GOP will not force changes to entity registration; although, this is a compliance matter that is beyond the scope of the present SAR.

The FMWG recommends that Reliability-related Services can be used in a generic sense in definitions, but should not itself be a defined term in the glossary. On this basis the term has been changed to "reliability-related services", i.e., all lowercase.

The revised definition is:

"The functional entity that operates generating unit(s) and performs the functions of supplying energy and ~~R~~reliability-related ~~S~~services."

Organization	Yes or No	Question 4 Comment
Alabama Municipal Electric Authority	No	All generators that are connected to the grid are not for reliability-related services. Many generators are used purely as financial hedges but not for grid reliability. These generators are usually smaller and can not notably influence characteristics of the grid such as voltage. If this definition is approved there will be many entities that will need to be un-registered as Generator Operators because their generators are only operated for power supply economics and not for grid reliability.
<p>Response: Thank you for your comment. The FMWG recognizes that not all generators produce reliability-related services, but believes that the proposed definition for GOP will not force changes to entity registration; although, this is a compliance matter beyond the scope of this SAR. The marked-up definition is: "The functional entity that operates generating unit(s) and performs the functions of supplying energy and reliability-related services."</p>		
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance

Organization	Yes or No	Question 4 Comment
		Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG's goal is to achieve the consistency you reference.</p>		
E.ON U.S.	No	See comment for #6 below
<p>Response: Thank you for your comment. Please see the response below under Question 6 comments.</p>		
FirstEnergy	No	<p>We believe that this term should be broken down further to differentiate between the entity at the controls of "a" generating unit and the entity that is not a balancing authority, but is located in a central control center with control over "many" generating units. Much confusion still remains when entities are trying to comply with the standards as to which requirement applies to which type of organization. Much clarity would be gained by segregating these two types of entities in the standards and the functional model. In addition, this definition uses the term Reliability-related Services which is ambiguous. See our comments in Questions 6.</p>
<p>Response: Thank you for your comment. The FMWG believes any proposal to divide the GOP into two functional entities should be initiated by a separate SAR. The present SAR is intended to address consistency of terminology, not to introduce fundamental changes that would impact reliability standards or registration.</p> <p>Regarding changes to the definition of IOS/Reliability-related Services, please see response to E.ON U.S. on its Question 6 comments.</p>		
PNGC Cowlitz Central Lincoln comment group	No	<p>Not all entities that meet the present registry criteria for this entity classification supply "Reliability-related Services" per the proposed definition. Is this SAR proposing to de-register these entities?</p>
<p>Response: Thank you for your comment. The FMWG recognizes that not all generators produce reliability-related services, but believes that the proposed definition for GOP will not force changes to entity registration. The marked-up definition is: "The functional entity that operates generating unit(s) and performs the functions of supplying energy and reliability-related services."</p>		
City of Vineland New Jersey	Yes	<p>I can only agree if the new definitions do not extend the BES requirement into the lower distribution system voltages other than the existing requirements IE Underfrequency load shedding.</p>

Organization	Yes or No	Question 4 Comment
<p>Response: Thank you for your comment. The Functional Model provides a list of the tasks that are generally performed to manage reliability. The Model groups the reliability tasks in a logical manner, and describes the actions and relationship between functional entities. The Model does not attempt to stipulate any definitive boundaries between a transmission system and a distribution system. As such, the proposed definition in the SAR does not extend BES requirements.</p>		
Dominion	Yes	
Duke Energy	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters suggested that the definition should include responsibility for facilities up to the point of Interconnection with either the Transmission Owner or Distribution Provider. The FMWG believes that defining the boundaries between generation and transmission facilities and associated standards and registration requirements is complex, and is outside of the scope of this SAR. The matter is being addressed by NERC in the report “Generator Requirements at the Transmission Interface Final Report 2, November 16, 2009” (http://www.nerc.com/files/GO-TO_Final_Report_Complete_2009Nov16.pdf) and by Project 2010-07. This project proposes changes to certain standards to add significant clarity to Generator Owners and Generator Operators regarding their reliability standard obligations at the interface with the interconnected grid. For the purposes of this project, no additional changes were made to the definition for Generator Owner. As proposed, it still reads:

“The functional entity that owns and maintains generating units.”

Organization	Yes or No	Question 5 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
E.ON U.S.	No	The definition should include responsibility for facilities up to the point of interconnection with either the Transmission Owner or Distribution Owner.
<p>Response: Thank you for your comment. Defining the boundaries between generation and transmission facilities and associated standards and registration requirements is a complex matter that is being addressed by NERC in the report “Generator Requirements at the Transmission</p>		

Organization	Yes or No	Question 5 Comment
<p>Interface Final Report 2, November 16, 2009” (http://www.nerc.com/files/GO-TO_Final_Report_Complete_2009Nov16.pdf) and by Project 2010-07. This project proposes changes to certain standards to add significant clarity to Generator Owners and Generator Operators regarding their reliability standard obligations at the interface with the interconnected grid.</p> <p>The FMWG believes it would be inappropriate to change the GO definition in any substantive way prior to the conclusion of these deliberations. Moreover, as noted, the present SAR is intended to address consistency of terminology in the definitions, not to introduce substantive changes.</p>		
Alabama Municipal Electric Authority	Yes	
City of Vineland New Jersey	Yes	
Dominion	Yes	
Duke Energy	Yes	
FirstEnergy	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	

Organization	Yes or No	Question 5 Comment
PNGC Cowlitz Central Lincoln comment group	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed change. Some commenters suggested adding specificity to the definition. Upon further review, the FMWG has decided to use "reliability-related services" to replace IOS; but this term should be used generically, not as a defined term. The FMWG recognizes the commenters’ concern about the non-specificity of the term, but believes this is not a problem if the term is to be used generically. Commenters can refer to P. 38-40 of the Technical Document for a general discussion on reliability-related services.

The FMWG recommends the use of "reliability-related services", i.e., all lowercase, to reflect the use of the term in a generic sense rather than as a defined term.

The definition of Interconnected Operations Services would be: "The term "reliability-related services" should be used in new or revised standards and NERC documents generally, in place of IOS."

Organization	Yes or No	Question 6 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms and the NERC Functional Model.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
City of Vineland New Jersey	No	I can only agree if the new definations do not extend the BES requiriemnts into the lower distribution system voltages other than the exisitng requirements IE Underfrequency load shedding.
<p>Response: Thank you for your comment. The Functional Model provides a list of the tasks that are generally performed to manage reliability. The Model groups the reliability tasks in a logical manner, and describes the actions and relationship between functional entities. The Model does not attempt to stipulate any definitive boundaries between a transmission system and a distribution system. As such, the proposed definition in the SAR does not extend BES requirements.</p>		

Organization	Yes or No	Question 6 Comment
E.ON U.S.	No	The term “Reliability-related” itself and the definition are too broad. Many services could be construed as “Reliability-related.” For example, support services such as removal of snow from a generation plant or substation access road might be viewed as “required to support the reliable operation of interconnected Bulk Electric Systems.” Such services, however, do not belong in the reliability standards. E ON U.S. suggests changing the term to “Reliability Service” and changing the definition to “... required for the reliable operation of the interconnected Bulk Electric System.”
<p>Response: Thank you for your comment. The FMWG recognizes the commenter’s concern about the non-specificity of the term, but believes this is not a problem if the term is to be used generically.</p>		
FirstEnergy	No	The proposed definition treats "energy services" as something that is separate from Reliability Related Services. There are components of "energy services" that are reliability-related. Also, the phrase "reliability-related" is currently not defined in the proposed Glossary. Much industry discussion continues as to the lack of definition for this term. Without a focused definition for "Reliability-related", the term Reliability-related Services is ambiguous and unclear.
<p>Response: Thank you for your comment.</p> <p>The FMWG agrees that there are components of “basic energy services” that are reliability-related, but does not believe that specifying all the details distinguishing between the two types of services in a definition is a desirable approach.</p> <p>The FMWG recognizes the commenter’s concern about the non-specificity of the term, but does not believe that a definition can or should provide all the details pertaining to these services.</p>		
Independent Electricity System Operator	No	We believe the phrase “basic energy and transmission services” could be made clearer by examples to show what should or should not be included. For example, is reactive power production considered a “basic” energy or transmission service?
<p>Response: Thank you for your comment. The FMWG recognizes the commenter’s concern about the non-specificity of the term, but does not believe that a definition can or should provide all the details pertaining to these services.</p>		
MRO's NERC Standards	No	It’s difficult to provide constructive comments when the purpose of the change is not known.

Organization	Yes or No	Question 6 Comment
Review Subcommittee		
<p>Response: Thank you for your comment. The purpose for replacing IOS is to expand the service components. The IOS reference document [see http://www.nerc.com/docs/pc/IOSrefdoc.pdf] specifies the types of services, which restricts diversity of services.</p>		
PNGC Cowlitz Central Lincoln comment group	No	<p>The NERC Glossary is better served by expanding the definition of “Reliability-related Services” to clarify what supports to the “reliable operation of interconnected Bulk Electric Systems” is being covered. The proposed definition is too vague. Is vegetation management and relay maintenance included with Reliability-related services? A suggested revision would be: Services required for voltage and frequency control, and reactive support for the reliable operation of the Bulk Electric System. If the definition stands as is, it is imperative to read through pages 42 and 43 of Version 5 of the Reliability Functional Model Technical Document to grasp the basic tenant here.</p>
<p>Response: Thank you for your comment. The FMWG recognizes the commenter’s concern about the non-specificity of the term, but believes this is not a problem if the term is to be used generically.</p>		
Alabama Municipal Electric Authority	Yes	
Dominion	Yes	
Duke Energy	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	

Organization	Yes or No	Question 6 Comment
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters raised a concern about the Load-Serving Entity’s role in securing reliability-related services, pointing out that the lack of specificity in these services may result in the LSEs being de-registered. The FMWG does not agree that changes in definition will result in de-registering an entity, and that in any case this matter is beyond the scope of the present SAR. As indicated in the response to comments under Question 6, above, the FMWG believes it is appropriate to leave the term reliability-related services unspecified and not formally define it. No changes were made to the proposed definition of Load-Serving Entity, other than to make "reliability-related services" all lowercase, consistent with the term being used generically. The definition reads as follows:

“The functional entity that secures energy and transmission service (and ~~R~~reliability-related ~~S~~services) to serve the electrical demand and energy requirements of its end-use customers.”

Organization	Yes or No	Question 7 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
City of Vineland New Jersey	No	I can only agree if the new definitions do not extend the BES requirements into the lower distribution system voltages other than the existing requirements IE Underfrequency load shedding.
<p>Response: Thank you for your comment. The Functional Model provides a list of the tasks that are generally performed to manage reliability. The Model groups the reliability tasks in a logical manner, and describes the actions and relationship between functional entities. The Model does not attempt to stipulate any definitive boundaries between a transmission system and a distribution system. As such, the proposed definition in the</p>		

Organization	Yes or No	Question 7 Comment
SAR does not extend BES requirements.		
E.ON U.S.	No	See comment for #6 above.
Response: Please see the response above under the Question 6 comments.		
FirstEnergy	No	This definition should be revised to state, "The functional entity that secures energy service, transmission service, and Reliability-related Services to serve the electrical demand and energy requirements of its end-use customers". In addition, this definition uses the term Reliability-related Services which is ambiguous. See our comments in Questions 6.
<p>Response: Thank you for your comment. The FMWG believes the editorial change you recommend would not materially improve the definition proposed in the SAR, and, thus, has not made any changes.</p> <p>With respect to the claimed ambiguity, please see our responses to your comments for Question 6.</p>		
PNGC Cowlitz Central Lincoln comment group	No	Not all entities that meet the present registry criteria for this entity classification supply "Reliability-related Services" per the proposed definition. Is this SAR proposing to de-register these entities?
Response: Thank you for your comment. The FMWG does not believe the proposed definition will impact registration; and, in any case, this matter is beyond the scope of the present SAR.		
Alabama Municipal Electric Authority	Yes	
Dominion	Yes	
Duke Energy	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	

Organization	Yes or No	Question 7 Comment
MRO's NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters suggested that “Planning Coordinator area” be defined, and some suggested that the time frame for planning assessments be more specific.

The FMWG discussed the need to define Planning Coordinator area, and concluded that the planning functions can span areas beyond any pre-defined footprints. Accordingly, the word “area” was dropped from the definitions for the Planning Coordinator, Resource Planner, and Transmission Planner.

The FMWG also discussed the need to add the phrase "generally one year and beyond," and concluded that the time frame for assessments performed by certain functional entities (Planning Coordinator, Transmission Planner, Resource Planner, etc.) varies from one organization to another, and there can be overlapping periods among these assessments for reliability need. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. If it is resolved that functional entities require a more specific time frame within which to perform their tasks, this should be specified in the reliability standards as appropriate.

The proposed definition now reads as follow:

"The functional entity that coordinates, facilitates, integrates, and evaluates ~~(generally one year and beyond)~~ transmission facility plans, service plans and resource plans, ~~within a Planning Coordinator area~~ and coordinates those plans with adjoining Planning Coordinators areas."

Organization	Yes or No	Question 8 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.

Organization	Yes or No	Question 8 Comment
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG's goal is to achieve the consistency you reference.</p>		
Duke Energy	No	The definition is poorly worded (grammatically confusing) - it's difficult to tell exactly what it is driving at. It's also not clear why protection system was removed from the list of things being coordinated.
<p>Response: Thank you for your comment. The FMWG agrees the proposed wording is confusing and has revised the wording to address this concern. The proposed definition (for the PC) is now: "The functional entity that coordinates, facilitates, integrates, and evaluates transmission facility plans, service plans and resource plans, and coordinates those plans with adjoining Planning Coordinators." The FMWG does not believe it is necessary to explicitly identify protection systems as a class of facility distinct from transmission and generation facilities.</p>		
E.ON U.S.	No	The word "evaluates" has been added to the definition of the Planning Coordinator. It is unclear whether evaluation implies approval
<p>Response: Thank you for your comment. The FMWG believes the meaning of "evaluates" is clear and, in particular, is separate from "approval."</p>		
FirstEnergy	No	Definitions by nature are designed to bring clarity and achieve common understanding. The use of the term "generally" in the following phrase in the definition "(generally one year and beyond)" invokes ambiguity. This should be revised to remove "generally" and specify an appropriate time period. The SDT should consider specifically stating "one year and beyond" since the definition of Long-term Planning Time Horizon in the SDT Guidelines is "a planning horizon of one year or longer".
<p>Response: Thank you for your comment. The FMWG discussed the need to add the phrase "generally one year and beyond," and concluded that the time frame for assessments performed by certain functional entities (Planning Coordinators, Transmission Planners, Resource Planners) varies from one organization to another and there can be overlapping periods among these assessments for reliability need. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. If it is resolved that functional entities require a more specific time frame within which to perform their tasks, this should be specified in the reliability standards, as appropriate.</p>		

Organization	Yes or No	Question 8 Comment
MRO's NERC Standards Review Subcommittee	No	<p>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.</p>
<p>Response: Thank you for your comment. The Statement of Compliance Registry Criteria [Rev. 5.0, (October 16, 2008)] can be found at http://www.nerc.com/files/Statement_Compliance_Registry_Criteria-V5-0.pdf. The function type definitions given on Pages 4-6 in this document are the same as the functional entity definitions given in the NERC glossary, except for a few minor (editorial) differences. The definitions that result from the present SAR will, therefore, be used to update the table of definitions in the statement of compliance registry criteria. Because the changes to definitions introduced in this SAR do not introduce substantive changes, the detailed criteria in the Statement of Compliance Registry Criteria will not be affected.</p>		
PacifiCorp	No	<p>The definition of Planning Coordinator is very vague. The terms used - "Coordinates, facilitates, integrates and evaluates..." are vague and are not sufficiently specific for an entity to determine whether or not it performs these functions. In addition, in the absence of a specific standard and the associated activities, it is not possible to fully evaluate this function. It would also be valuable to have the term "Planning Coordinator area" defined in order to establish the scope of the Planning Coordinator function.</p>
<p>Response: Thank you for your comment. The FMWG believes that the proposed definition contains an appropriate degree of specificity. If more specific words were to be used, the definition would not be able to accommodate the considerable variation in planning between jurisdictions. The FMWG agrees with the commenter that additional information, such as that in standards or the Tasks of the Functional Model, may be necessary to evaluate the applicability of this functional entity. However, the FMWG does not see this level of specificity needs to go into the definition of the term.</p> <p>The FMWG discussed the need to define Planning Coordinator area, but concluded that the planning functions can span over areas beyond any</p>		

Organization	Yes or No	Question 8 Comment
pre-defined footprints. The word “area” was dropped from the definitions for the Planning Coordinator, Resource Planner, and Transmission Planner.		
US Bureau of Reclamation	No	There appears to be an overlap between the Planning Authority planning window and that of the Balancing Authority. This will tend to cause a conflict when the planning study results in differences. It may be appropriate to specify that study period for the Planning Authority is "(generally greater than one year and beyond)".
<p>Response: Thank you for your comment. Though it recognizes the need to avoid such an overlap, the FMWG believes the proposed definitions are adequate. The FMWG discussed the need to add "generally one year and beyond," and concluded that the time frame for assessments performed by certain functional entities (BAs, Planning Coordinators, Transmission Planners, etc.) varies from one organization to another, and there can be overlapping periods among these assessments for reliability need. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. If it is resolved that functional entities require a more specific time frame within which to perform their tasks, this should be specified in the reliability standards, as appropriate.</p>		
Alabama Municipal Electric Authority	Yes	
City of Vineland New Jersey	Yes	
Dominion	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
Northeast Power Coordinating Council	Yes	
Pepco Holdings, Inc.	Yes	

Organization	Yes or No	Question 8 Comment
PNGC Cowlitz Central Lincoln comment group	Yes	
South Carolina Electric and Gas	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters raised concerns over the lack of specificity of the term “Reliability-related Services.”

The revised definition is that given in the SAR on terminology, with the exception of replacing "Reliability-related Services" with "reliability-related services," and the deletion of "and takes title to," which arose in consideration of comments received on the SAR.

The use of reliability-related services" is given in the response to Question 6.

The reference to the taking of title was dropped because the term was judged to be implicit in the purchasing of energy, and hence not appropriate for inclusion in the definition.

The revised proposed definition reads:

"The functional entity that purchases and/or sells, ~~and takes title to~~ energy, capacity and ~~R~~reliability-related ~~S~~services."

Organization	Yes or No	Question 9 Comment
Alabama Municipal Electric Authority	No	You may want to consider changing "purchases or sells" to "purchases and/or sells".
Response: Thank you for your comment. That change has been made.		
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.		

Organization	Yes or No	Question 9 Comment
E.ON U.S.	No	The term “Reliability-related” itself and the definition are too broad. Many services could be construed as “Reliability-related.” For example, support services such as removal of snow from a generation plant or substation access road might be viewed as “required to support the reliable operation of interconnected Bulk Electric Systems.” Such services, however, do not belong in the reliability standards. E ON U.S. suggests changing the term to “Reliability Service” and changing the definition to “... required for the reliable operation of the interconnected Bulk Electric System.”
<p>Response: Thank you for your comment. The FMWG recognizes the commenter’s concern about the non-specificity of the term, but believes this is not a problem if the term is to be used generically.</p>		
FirstEnergy	No	This definition uses the term Reliability-related Services which is ambiguous. See our comments in Questions 6.
<p>Response: Thank you for your comment. The FMWG recognizes the commenter’s concern about the non-specificity of the term, but believes this is not a problem if the term is to be used generically.</p>		
PNGC Cowlitz Central Lincoln comment group	No	Not all entities that meet the present registry criteria for this entity classification supply “Reliability-related Services” per the proposed definition. Is this SAR proposing to de-register these entities?
<p>Response: Thank you for your comment. The FMWG recognizes that not all Purchasing-Selling Entities buy or sell reliability-related services, but believes that the proposed definition for PSE will not force changes to entity registration. In any case, this matter is beyond the scope of the present SAR.</p>		
City of Vineland New Jersey	Yes	
Dominion	Yes	
Duke Energy	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	

Consideration of Comments on SAR for Functional Model Glossary — Project 2010-08

Organization	Yes or No	Question 9 Comment
ISO New England Inc.	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters suggested adding wording to clarify the time frame within which the Reliability Coordinator has real-time reliability responsibility. The FMWG does not believe this change is necessary or appropriate because the specific time frame within which a responsible entity needs to perform its tasks is more suited for specification in the reliability standards.

Other commenters suggested adding “and among adjacent Reliability Coordinators” to more clearly define the role of a Reliability Coordinator. The FMWG agreed, but prefers the term “adjoining,” as used in the definition of PC, to “adjacent.” “Adjoining” carries a stronger sense of the desired attribute of electrical connection between the areas in question.

The FMWG also changed “Real-time” to “real-time.” NERC standards make use of both “Real-time” and “real-time,” but the latter is used more frequently and, hence, is preferable from consistency considerations.

Accordingly, the definition has been revised to:

*“The functional entity that maintains the ~~R~~real-time operating reliability of the Bulk Electric System within a Reliability Coordinator Area **and among adjoining Reliability Coordinator Areas.**”*

Organization	Yes or No	Question 10 Comment
Northeast Power Coordinating Council	No	Add “and among adjacent Reliability Coordinator Areas” at the end of the definition in order to accomplish the “wide area view” perspective of the function.
Response: Thank you for your comment. The FMWG agrees with the concept, but, as explained above, prefers the term “adjoining.”		
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
Response: Thank you for your comment. The stated purpose of the SAR is “To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria.” The FMWG’s goal is to achieve the		

Organization	Yes or No	Question 10 Comment
consistency you reference.		
E.ON U.S.	No	The definition should clearly state that the RC is the highest level of authority for BES operation and maintaining reliability. Reliability Coordinators are also responsible for the near-term reliability of the BES. The definition should clarify who is responsible for the period just after Real-time up to, for example, one-year.
<p>Response: Thank you for your comment. The FMWG has attempted to maintain a uniform style for all of the functional entity definitions, in part by limiting the definitions to one sentence and excluding explanatory material. The FMWG does not agree with the inclusion of wording on the RC as final arbiter. This wording is explanatory; and while it may add clarity, it need not be included in the definition.</p> <p>We do not see the need to include any specific time frame. The FMWG believes the specific time frame within which a responsible entity needs to perform its tasks is more suited for specification in the reliability standards.</p>		
Duke Energy	No	The definition should specify that the RC maintains the real-time operating reliability of its RC Area through functional direction.
<p>Response: Thank you for your comment. The FMWG believes the definition proposed in the SAR is appropriate - it specifies the "what" ("maintains the Real-time operating reliability") and not the "how" (through functional direction).</p>		
MRO's NERC Standards Review Subcommittee	No	The functional entity that maintains the Real-time operating reliability of the Bulk Electric System within its Reliability Coordinator Area. See comment #17 below.
<p>Response: Thank you for your comment. Please see response to MRO's NERC Standards Review Subcommittee on its Question 17 comments.</p>		
US Bureau of Reclamation	No	The modifications of the language eliminates the Reliability Coordinator as the final arbiter of conflicts that could have been resolved without involving the Regional Reliability Organizations. Alternative language should be included such as "Reliability Coordinators have the authority to direct the other functional entities to take certain actions to ensure that its Reliability Coordinator Area operates reliably".
<p>Response: Thank you for your comment. The FMWG has attempted to maintain a uniform style for all of the functional entity definitions, in part by limiting the definitions to one sentence and excluding explanatory material. The wording on the RC as final arbiter is explanatory; while it may</p>		

Organization	Yes or No	Question 10 Comment
add clarity, it need not be included in the definition.		
IRC Standards Review Committee	No	We suggest adding “and among adjacent Reliability Coordinator Areas within the same Interconnection” at the end of the definition in order to accomplish the “wide area view” perspective of the function.
<p>Response: Thank you for your comment. The FMWG added “and among adjoining Reliability Coordinators,” leaving it to the standards process to determine any need for coordination between Interconnections. Hence, we do not agree with the addition of “within the same Interconnection,” as this would preclude reliability coordination between entities in different Interconnections.</p>		
ISO New England Inc.	No	We suggest adding “and among adjacent Reliability Coordinator Areas” at the end of the definition in order to accomplish the “wide area view” perspective of the function.
<p>Response: Thank you for your comment. The FMWG agrees and had made this change; but using "adjoining" rather than "adjacent", as given above.</p>		
Alabama Municipal Electric Authority	Yes	
City of Vineland New Jersey	Yes	
Dominion	Yes	
FirstEnergy	Yes	
Independent Electricity System Operator	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
PNGC Cowlitz Central Lincoln comment group	Yes	
South Carolina Electric and	Yes	

Organization	Yes or No	Question 10 Comment
Gas		

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters raised concern about the phrase “generally one year and beyond”. The FMWG reviewed this and concluded that the time frame for assessments performed by certain functional entities (BAs, Planning Coordinators, Transmission Planners, Resource Planners, etc.) varies from one organization to another and there can be overlapping periods among these assessments for reliability need. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. A more specific time frame within which a responsible entity needs to perform its tasks is better suited for specification in the reliability standards.

The FMWG also discussed the need to define Resource Planning area and concluded that the planning functions can span over areas beyond any pre-defined footprints. The word “area” is, thus, dropped from the definitions for the Planning Coordinator, Resource Planner, and Transmission Planner.

The revised definition of Resource Planner is: *“The functional entity that develops ~~a long-term (generally one year and beyond)~~ plans for the resource adequacy of specific loads (customer demand and energy requirements).”*

Organization	Yes or No	Question 11 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
FirstEnergy	No	Definitions by nature are designed to bring clarity and achieve common understanding. The use of the term "generally" in the following phrase in the definition "(generally one year and beyond)" invokes ambiguity. This should be revised to remove "generally" and specify an appropriate time

Organization	Yes or No	Question 11 Comment
		<p>period. The SDT should consider specifically stating "one year and beyond" since the definition of Long-term Planning Time Horizon in the SDT Guidelines is "a planning horizon of one year or longer". Also, we suggest adding a definition of Resource Planner Area since other "areas" are defined, i.e. Transmission Operator Area, Planning Coordinator Area.</p>
<p>Response: Thank you for your comment. The FMWG discussed the need to add "generally one year and beyond," and concluded that the time frame for assessments performed by certain functional entities (BAs, Planning Coordinators, Transmission Planners, Resource Planners, etc.) varies from one organization to another. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. A more specific time frame within which a responsible entity needs to perform its tasks is better suited for specification in the reliability standards.</p> <p>With respect to adding a definition for "Resource Planning Area," the FMWG discussed the need to define Resource Planning area and concluded that the planning functions can span over areas beyond any pre-defined footprints. The word "area" was dropped from the definitions for the Planning Coordinator, Resource Planner, and Transmission Planner.</p>		
Alabama Municipal Electric Authority	Yes	
City of Vineland New Jersey	Yes	
Dominion	Yes	
Duke Energy	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
MRO's NERC Standards Review Subcommittee	Yes	

Organization	Yes or No	Question 11 Comment
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
PNGC Cowlitz Central Lincoln comment group	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	
E.ON U.S.	Yes	The use of the term Resource Planner with the term “area” (not capitalized) in the last sentence could cause confusion as most times the term “area” is used in a capitalized form. E ON U.S. suggests changing the end of the definition to “...within a Resource Planner’s purview.”
<p>Response: Thank you for your comment. The FMWG discussed the need to define Resource Planning area, and concluded that the planning functions can span areas beyond any pre-defined footprints. The word “area” was dropped from the definitions for the Planning Coordinator, Resource Planner, and Transmission Planner.</p>		

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters suggested adding a specific time frame to the definition. The FMWG discussed the need to specify the time frame in the definitions for this and other entities, and concluded that the time frame for assessments performed by certain functional entities (BAs, Transmission Operators, Planning Coordinators, Transmission Planners, Resource Planners, etc.) varies from one organization to another. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. Where there is a need to specify the time frame within which a responsible entity needs to perform its tasks, this should be done in the reliability standards, as appropriate.

Some commenters suggested to capitalize the word “area” in the proposed definition. The FMWG agrees, recognizing that the area will be defined and definite, and has changed the definition to:

*“The functional entity that ensures the **Real-time**[LA1] operating reliability of the transmission assets within a Transmission Operator Area.”*

Organization	Yes or No	Question 12 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
Independent Electricity System Operator	No	Since it is difficult or perhaps to “ensure” real-time operating Reliability, we propose the following: “Plans, monitors and controls the real-time operation of the transmission assets within Transmission Operator Area with the objective of assuring/ensuring real-time operating reliability.”

Organization	Yes or No	Question 12 Comment
<p>Response: Thank you for your comment. The FMWG disagrees with this proposal because it believes that definitions should simply state the tasks being performed and avoid questions of the objective of the tasks, the difficulty of performing tasks, or failure to perform them.</p>		
E.ON U.S.	No	<p>The definition should clarify who is responsible for the time period just after Real-time to one-year. The definition appears inconsistent with the defined requirements of the NERC standards.</p>
<p>Response: Thank you for your comment. The FMWG understands this proposal to mean defining responsibility for planning for the period after real time. The FMWG discussed the need to specify the time frame in the definitions for this and other entities, and concluded that the time frame for assessments performed by certain functional entities (BAs, Transmission Operators, Planning Coordinators, Transmission Planners, Resource Planners, etc.) vary from one organization to another. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. A more specific time frame within which a responsible entity needs to perform its tasks is better suited for specification in the reliability standards, as appropriate.</p>		
Alabama Municipal Electric Authority	Yes	
City of Vineland New Jersey	Yes	
Dominion	Yes	
Duke Energy	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
PNGC Cowlitz Central Lincoln	Yes	

Organization	Yes or No	Question 12 Comment
comment group		
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	
FirstEnergy	Yes	Also, "area" in the definition needs to be capitalized since Transmission Operator Area is a defined term.
Response: Thank you for your comment. The FMWG agrees and made this change.		
MRO's NERC Standards Review Subcommittee	Yes	We like the removal of the word local since it's subjective.
Response: Thank you for your comment.		

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters suggested capitalizing “transmission.” The FMWG disagrees on the need to capitalize, as suggested. The proposed definition retains "transmission facilities" (lowercase) used in the current definition and generally in the NERC glossary. The proposed definition still reads:

“The functional entity that owns and maintains transmission facilities.”

Organization	Yes or No	Question 13 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
E.ON U.S.	No	E.ON U.S. suggests that the term “transmission” needs to be capitalized. The suggested language should read: “The functional entity that ensures the Real-time operating reliability of the Transmission assets within a Transmission operator area.”
<p>Response: Thank you for your comment. The FMWG disagrees on the need to capitalize, as suggested. The proposed definition retains "transmission facilities" (lowercase) used in the current definition and generally in the glossary.</p>		
Alabama Municipal Electric Authority	Yes	
City of Vineland New Jersey	Yes	
Dominion	Yes	

Consideration of Comments on SAR for Functional Model Glossary — Project 2010-08

Organization	Yes or No	Question 13 Comment
Duke Energy	Yes	
FirstEnergy	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
PNGC Cowlitz Central Lincoln comment group	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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.

Summary Consideration: Most commenters agreed with the proposed changes. Some commenters suggested clarifying the time frame within which the Transmission Planner performs its tasks. The FMWG discussed the need to add "generally one year and beyond," or other time frames and concluded that the time frame for assessments performed by certain functional entities (BAs, Transmission Operators, Planning Coordinators, Transmission Planners, Resources Planners, etc.) varies from one organization to another and there can be overlapping periods among these assessments for reliability need. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. Where there is a need to specify the time frame within which a responsible entity needs to perform its tasks, this is better done in the reliability standards, as appropriate.

Some commenters suggested defining the term Transmission Planning area. The FMWG discussed this, and concluded that the planning functions can span areas, beyond any pre-defined footprints. The word “area” was, thus, dropped from the definitions for the Planning Coordinator, Resource Planner, and Transmission Planner.

The revised definition is: *"The functional entity that develops plans for the reliability (adequacy) of interconnected bulk electric transmission systems ~~within a Transmission Planner area.~~"*

Organization	Yes or No	Question 14 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
FirstEnergy	No	Definitions by nature are designed to bring clarity and achieve common understanding. The use of the term "generally" in the following phrase in the definition "(generally one year and beyond)"

Organization	Yes or No	Question 14 Comment
		<p>invokes ambiguity. This should be revised to remove "generally" and specify an appropriate time period. The SDT should consider specifically stating "one year and beyond" since the definition of Long-term Planning Time Horizon in the SDT Guidelines is "a planning horizon of one year or longer". Also, we suggest adding a definition of Transmission Planner Area since other "areas" are defined, i.e. Transmission Operator Area, Planning Coordinator Area.</p>
<p>Response: Thank you for your comment. The FMWG discussed the need to add "generally one year and beyond," and concluded that the time frame for assessments performed by certain functional entities (BAs, Planning Coordinators, Transmission Planners, Resources Planners, etc.) varies from one organization to another, and there can be overlapping periods among these assessments for reliability need. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. A more specific time frame within which a responsible entity needs to perform its tasks is better suited for specification in the reliability standards.</p> <p>The FMWG discussed the need to define Transmission Planning area, and concluded that the planning functions can span over areas beyond any pre-defined foot prints. The word "area" was thus dropped from the definitions for the Planning Coordinator, Resource Planner, and Transmission Planner.</p>		
E.ON U.S.	No	<p>The definition should clarify which entity is responsible for the time period just after Real-time to, for example, one-year.</p>
<p>Response: Thank you for your comment. The FMWG discussed the need to specify a time frame to the definitions for this and other entities, and concluded that the time frame for assessments performed by certain functional entities (BAs, Transmission Operators, Planning Coordinators, Transmission Planners, Resource Planners, etc.) varies from one organization to another. Thus, assigning a fixed time frame to the definition for a functional entity is inappropriate and unnecessary. A more specific time frame within which a responsible entity needs to perform its tasks is better suited for specification in the reliability standards as appropriate.</p>		
Alabama Municipal Electric Authority	Yes	
City of Vineland New Jersey	Yes	
Dominion	Yes	
Duke Energy	Yes	

Consideration of Comments on SAR for Functional Model Glossary — Project 2010-08

Organization	Yes or No	Question 14 Comment
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
PNGC Cowlitz Central Lincoln comment group	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	
MRO's NERC Standards Review Subcommittee	Yes	See comment #17 below.
<p>Response: Thank you for your comment. Please see our response to your comment on Question 17 below.</p>		

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.

Summary Consideration: Most commenters agreed with the proposed changes. The proposed definition still reads:

“The functional entity that administers the transmission tariff and provides Transmission Service to Transmission Customers under applicable transmission service agreements.”

Organization	Yes or No	Question 15 Comment
BGE	No	BGE’s agreement with the proposed revision is contingent upon its consistent application across the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
<p>Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.</p>		
Alabama Municipal Electric Authority	Yes	
City of Vineland New Jersey	Yes	
Dominion	Yes	
Duke Energy	Yes	
E.ON U.S.	Yes	
FirstEnergy	Yes	
Independent Electricity System Operator	Yes	

Organization	Yes or No	Question 15 Comment
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Northeast Power Coordinating Council	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
PNGC Cowlitz Central Lincoln comment group	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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

Summary Consideration: Most commenters agreed with the proposed implementation plan. Some commenters suggested that the implementation plan should include notifying existing drafting teams of impending changes to terms for incorporation into current projects and drafting team work. The FMWG agrees and will communicate with existing standards drafting teams once the proposed definition changes are approved.

A commenter raised the question of incorporating the changed definitions into existing standards. We suggest this is a matter for the Standards Committee. The FMWG recommends that any such incorporation be administratively efficient. For example, in the change from Interchange Authority (IA) to Interchange Coordinator (IC), in addition to the new definition for the IC the definition for the IA could be changed to "See Interchange Coordinator." As a result, the replacement of IC by IA in the various NERC documents and standards can be made on an opportunistic basis, for example, when a particular standard or document is being revised for other reasons.

Organization	Yes or No	Question 16 Comment
Northeast Power Coordinating Council		Please refer to the response to Q#17 following.
Response: Thank you for your comment. Please see response to NPCC on its Question 17 comments.		
BGE	No	BGE’s agreement with the proposed implementation plan is contingent upon it being consistently applied to the NERC Glossary of Terms, the NERC Functional Model and the NERC Statement of Compliance Registration Criteria.
Response: Thank you for your comment. The stated purpose of the SAR is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria." The FMWG’s goal is to achieve the consistency you reference.		
City of Vineland New Jersey	No	I think NERC and RFC must have more time to clearly state their intentions of new wording and

Organization	Yes or No	Question 16 Comment
		<p>how it filters down through all the standards. Must have more seminars and discussions on all the standards for all these changes.</p>
<p>Response: Thank you for your comment. The FMWG disagrees. The SAR is clear that the changes proposed for consistency and are editorial in nature. As a result, there will be no substantive impact on standards.</p>		
E.ON U.S.	No	<p>The implementation plan should address the process for the revision of the entire suite of the Reliability Standards to reflect the changes proposed to the Functional Entities. Suggest implementation plan includes notification of existing drafting teams of impending changes to terms for incorporation into current projects and drafting team work</p>
<p>Response: Thank you for your comment. The FMWG agrees that once the revisions are approved, it would be appropriate to notify existing drafting teams, as suggested.</p> <p>The question of the degree or manner in which the definitions should update <u>existing</u> standards should be addressed by the Standards Committee. We note, however, our intention is to implement the changes in an efficient manner. For example, in the change from Interchange Authority (IA) to Interchange Coordinator (IC), in addition to the new definition for the IC the definition for the IA will be changed to "See Interchange Coordinator." As a result, the replacement of IC by IA in the various NERC documents and standards can be made on an opportunistic basis, for example, when a particular standard or document is being revised for other reasons.</p>		
MRO's NERC Standards Review Subcommittee	No	<p>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?</p>
<p>Response: Thank you for your comment. The SAR is clear that the changes are proposed for consistency and are editorial in nature. As a result, there will be no substantive impact on registration.</p> <p>There are no entities registered as PC or IC. As of January 26, 2011 there are 59 entities registered as IA and 81 registered as PA. NERC and the Regional Entities will determine registration changes.</p> <p>The intention is to retain the replaced entities in the glossary by making reference to the new entities. For example, for PA the revised definition will be "See Planning Coordinator, the term to be used in new or revised standards and NERC documents generally." As a result, the changes to the NERC Statement of Compliance Registration Criteria could be as simple as modifying just the table of definitions: The Statement of Compliance Registry Criteria [Rev. 5.0, (October 16, 2008)] can be found at http://www.nerc.com/files/Statement_Compliance_Registry_Criteria-V5-0.pdf. The</p>		

Organization	Yes or No	Question 16 Comment
<p>function type definitions given on Pages 4-6 in this document are the same as the functional entity definitions given in the NERC glossary, except for a few minor (editorial) differences. The definitions that result from the present SAR will, therefore, be used to update the table of definitions in the Statement of Compliance Registry Criteria. Because the changes to definitions introduced in this SAR do not introduce substantive changes, the detailed criteria in the Statement of Compliance Registry Criteria will not be affected.</p>		
Alabama Municipal Electric Authority	Yes	
Dominion	Yes	
Duke Energy	Yes	
FirstEnergy	Yes	
Independent Electricity System Operator	Yes	
IRC Standards Review Committee	Yes	
ISO New England Inc.	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc.	Yes	
PNGC Cowlitz Central Lincoln comment group	Yes	
South Carolina Electric and Gas	Yes	
US Bureau of Reclamation	Yes	

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.

Summary Consideration: A number of commenters pointed out that the term “Reliability Assurer” is not included in the proposed definition revision. Reliability Assurer (RA) is not defined in the glossary; and, accordingly, it is referenced in the SAR on P. 3 that the standard (SAR) will not apply to the RA. However, as pointed out by the commenter, the RA, while not defined in the NERC Glossary of Terms, has been added to the SAR template sheet. The FMWG did not consider this when the SAR was developed. The RA is, in fact, defined on P. 3 of the SAR as:

"Monitors and evaluates the activities related to planning and operations, and coordinates activities of Responsible Entities to secure the reliability of the bulk power system within a Reliability Assurer area and adjacent areas."

The fact that the RA is defined in a document other than the Functional Model means that consistency among definitions is needed. Accordingly, the FMWG agrees with the commenter that the definition of RA given in Version 5 of the Model be adopted as modified below:

"The functional entity that monitors and evaluates the activities related to planning and operations, and coordinates activities of functional entities to secure the reliability of the Bulk Electric System."

Given that the RA has not to date been extensively addressed within NERC, it is premature to specify a defined area for the RA and to preclude overlaps, etc. For this reason, we have removed “within a Reliability Assurer area and adjacent areas,” similar to the case of the PC, TP and RP.

The FMWG agrees that this term should be defined in the glossary.

Organization	Question 17 Comment
FirstEnergy	1. This SAR project should set the stage and provide clear expectations and a path forward for the intended use of the Compliance Enforcement Authority (CEA), Reliability Assurer (RA) and the discontinued use of the Regional Reliability Organization (RRO) and Regional Entity (RE) within NERC reliability standards. FirstEnergy believes that existing and future drafting teams when identifying the use of RE or RRO within a standard should carefully consider if the intended party is the CEA or the RA or if the reference to RRO or RE can be deleted or revised to reflect another responsible entity classification (i.e Reliability Coordinator, Planning Coordinator,

Organization	Question 17 Comment
	<p>etc.). While in a transitional phase definitions for CEA, RA, RE and RRO should be available in the NERC Glossary of Terms. It is interesting to note that the RA has been added to the SAR template sheet, but not defined in the NERC Glossary of Terms. Additionally the term Regional Entity is often found in NERC Reliability Standards but no definition exists in the NERC Glossary of Terms. The following are proposed FE definitions for the NERC Glossary of Terms to help aid industry understanding: (a) Regional Reliability Organization (RRO) - "A legacy NERC Reliability Standard reference being phased out and transitioned to either the Compliance Enforcement Authority, Reliability Assurer or other NERC Registry responsible entity classifications as deemed appropriate. The RRO has the existing meaning within NERC Reliability Standards: "(1) An entity that ensures that a defined area of the Bulk Electric System is reliable, adequate and secure; and (2) A member of the North American Electric Reliability Council. The Regional Reliability Organization can serve as the Compliance Monitor." (b) Reliability Assurer (RA) - "The functional entity that monitors and evaluates the activities related to planning and operations, and coordinates activities of functional entities to secure the reliability of the Bulk Electric System within a Reliability Assurer area and adjacent areas." Note, the RA definition found in the SAR Template is a slight variation of the proposed definition and should be revised as proposed. (c) Regional Entity (RE) - "A legacy NERC Reliability Standard reference being phased out and transitioned to either the Compliance Enforcement Authority, Reliability Assurer or other NERC Registry responsible entity classifications as deemed appropriate. In general, the Compliance Enforcement Authority is likely the appropriate definition where presently utilized within existing NERC reliability standards, however, the intended party may vary for unique situations and use." (d) Compliance Enforcement Authority (CEA) - [FE supports the proposed revision of Compliance Monitor that creates the CEA definition]</p> <p>2. The SAR states, "In addition, some inconsistencies in usage were found in the Rules of Procedure, specifically, in Appendix 5 - Organization Registration and Certification Manual, and Appendix 3A, Reliability Standards Development Process. However, these inconsistencies in the Rules of Procedure are minor, and it is recommended they be considered only when other revisions to these appendices are considered." The SAR is designed to remove inconsistency and improve clarity. It would be better to make these changes now as errata changes than to allow any opportunity for misunderstanding to continue.</p> <p>3. Other improvements regarding the following terms in the NERC Glossary: (a) Balancing Authority Area - For consistency with the proposed change to the Balancing Authority definition, the phrase "load resource" should be changed to "generation-load-interchange". (b) Institute of Electrical and Electronics Engineers, Inc. - This</p>

Organization	Question 17 Comment
	<p>term is not defined in the glossary; only the acronym IEEE is supplied. Should this organization be in a NERC Glossary of terms?4. The SDT should consider the continued need for the following defined terms which are either not used in any standards, or that are used in the standards but not capitalized: (a) Adequacy - This term is not used in any standard; only an uncapitalized version is used in soon to be retired standards TPL-005 and TPL-006. (b) Cascading Outages - Remove from glossary. (c) Clock Hour - This term is not used in any standard; only an uncapitalized version is used in BAL-001 and TOP-005. (d) Fire Risk - This term is not used in any standard; only an uncapitalized version is used in FAC-003-1. (e) Flashover - This term is not used in any standard; only an uncapitalized version is used in FAC-003-1. (f) Forced Outage - This term is not used in any standard or defined term. (g) Frequency Regulation - This term is not used in any standard or defined term. (h) Hourly Value - This term is not used in any standard; only an uncapitalized version is used. (i) Joint Control - This term is not used in any standard or defined term.</p>
<p>Response: Thank you for your comments.</p> <p>The FMWG agrees that "While in a transitional phase definitions for CEA, RA, RE and RRO should be available in the NERC glossary of terms." This is the preferred approach for all terms being replaced.</p> <p>Concerning the intended implementation plan, please note the response to MRO's NERC Standards Review Subcommittee on its Question 3 comments:</p> <p>The Statement of Compliance Registry Criteria [Rev. 5.0, (October 16, 2008)] can be found at http://www.nerc.com/files/Statement_Compliance_Registry_Criteria-V5-0.pdf. The function type definitions given on Pages 4-6 in this document are the same as the functional entity definitions given in the NERC glossary, except for a few minor (editorial) differences. The definitions that result from the present SAR will, therefore, be used to update the table of definitions in the statement of compliance registry criteria. Because the changes to definitions introduced in this SAR do not introduce substantive changes, the detailed criteria in the Statement of Compliance Registry Criteria will not be affected.</p> <p>Concerning the Reliability Assurer (RA), this entity is not defined in the glossary, and accordingly it is referenced in the SAR on P. 3 that the standard (SAR) will not apply to the RA. However, as you point out, while the RA, is not defined in the NERC glossary of terms, it has been added to the SAR template sheet. The FMWG did not consider this when the SAR was developed. The RA is, in fact, defined on P. 3 of the SAR as: "Monitors and evaluates the activities related to planning and operations, and coordinates activities of Responsible Entities to secure the</p>	

Organization	Question 17 Comment
	<p>reliability of the bulk power system within a Reliability Assurer Area and adjacent areas."</p> <p>The fact that the RA is defined in a document other than the Functional Model means that consistency among the definitions is needed. Accordingly, the FMWG agrees with the commenter that the definition of RA given in Version 5 of the Model be adopted as modified below. (Note the removal of "within a Reliability Assurer area and adjacent areas" for the same reason that we removed like terms from the PC, TP and RP definitions):</p> <p>"The functional entity that monitors and evaluates the activities related to planning and operations, and coordinates activities of functional entities to secure the reliability of the Bulk Electric System."</p> <p>Concerning the replacement of the terms RRO and Regional Entity within standards by CEA and RA, the FMWG agrees with the commenter that the terms RRO and RE be included in the glossary during the transition period. The FMWG leaves it to others to provide appropriate definitions that point out that the terms CEA and/or RA are to be used in future references. We have noted that all Regional Entities currently serve as CEAs; while REs may (or may not) serve as RAs.</p> <p>2. The FMWG appreciates your support for removing inconsistency of usage in the Rules of Procedure. These inconsistencies typically involved the terms functional entity, registered entity and responsible entity. Upon further review, the FMWG concluded that these inconsistencies were minor, subject to question, and unlikely to cause confusion. As a result, it is recommended they not be pursued at this time.</p> <p>3. The FMWG appreciates the above changes suggested to the glossary beyond those considered in the present SAR, but addressing them is outside the scope of this team. The suggestions would be best addressed in a separate SAR, perhaps as part of a comprehensive review of the glossary.</p>
BGE	<p>Despite the fact that this SAR's stated purpose is "To align the definitions of various functional entities between the Functional Model, the NERC Glossary of Terms, and the NERC Statement of Compliance Registration Criteria", there is no clear indication anywhere in the document that the proposed revisions would be applied to anything but the NERC Glossary of Terms (e.g., the headers on pages 6-7 of the SAR are labeled "Proposed Revisions to Glossary of Terms Used in Reliability Standards"). Although uniform application of functional terminology is implied under Section II/pg. 4 of NERC's "Statement of Compliance Registry Criteria" v5.0, this concept is not clearly represented within the SAR. To avoid industry confusion and to ensure consistency in terminology, this should have been spelled out in the SAR.</p>

Organization	Question 17 Comment
	<p>Response: Thank you for your comment. The Statement of Compliance Registry Criteria [Rev. 5.0, (October 16, 2008)] can be found at http://www.nerc.com/files/Statement_Compliance_Registry_Criteria-V5-0.pdf. The function type definitions given on Pages 4-6 in this document are the same as the functional entity definitions given in the NERC glossary, except for a few minor (editorial) differences. The definitions that result from the present SAR will, therefore, be used to update the table of definitions in the Statement of Compliance Registry Criteria. Because the changes to definitions introduced in this SAR do not introduce substantive changes, the detailed criteria in the Statement of Compliance Registry Criteria will not be affected.</p>
E.ON U.S.	<p>E ON U.S. questions whether due consideration has be given to the effort and cost of revising documents and reference materials to reflect changing titles from “authority” to “coordinator.” This will require a large effort at NERC and all the involved functional entities. It would appear any document using the old “authority” terms will now need to be revised to use “coordinator” in order to be correct and thus compliant with the standards.</p>
	<p>Response: Thank you for your comment.</p> <p>The Statement of Compliance Registry Criteria [Rev. 5.0, (October 16, 2008)] can be found at http://www.nerc.com/files/Statement_Compliance_Registry_Criteria-V5-0.pdf. The function type definitions given on Pages 4-6 in this document are the same as the functional entity definitions given in the NERC glossary, except for a few minor (editorial) differences. The definitions that result from the present SAR will, therefore, be used to update the table of definitions in the statement of compliance registry criteria. Because the changes to definitions introduced in this SAR do not introduce substantive changes, the detailed criteria in the Statement of Compliance Registry Criteria will not be affected.</p> <p>See the summary comment for Question 16. The intention is to implement the changes in an efficient manner. For example, in the change from Interchange Authority (IA) to Interchange Coordinator (IC), in addition to the new definition for the IC, the definition for the IA will be changed to "See Interchange Coordinator." As a result, the replacement of IC by IA in the various NERC documents and standards can be made on an opportunistic basis; for example, when a particular standard or document is being revised for other reasons.</p>
South Carolina Electric and Gas	none
Dominion	<p>Still have concerns with LSE function and entity as described in the Functional Model. However, we agree that the terms in the glossary should reflect terms used in NERC standards, functional model, etc. Will provide comments on LSE at next functional model revision.</p>

Organization	Question 17 Comment
<p>Response: Thank you for your comment.</p>	
<p>PacifiCorp</p>	<p>The term “Reliability Assurer” is also not defined. While it is not part of this SAR, its listing on page SAR-3 draws attention to the fact that this effort to provide definitions and improve consistency is a very limited exercise and more work on existing terms is still needed.</p>
<p>Response: Thank you for your comment. Reliability Assurer (RA) is not defined in the glossary; and, accordingly, it is referenced in the SAR on P. 3 that the standard (SAR) will not apply to the RA. However, as you point out, while the RA, is not defined in the NERC glossary, it has been added to the SAR template sheet. The FMWG did not consider this when the SAR was developed. The RA is, in fact, defined on P. 3 of the SAR as: "Monitors and evaluates the activities related to planning and operations, and coordinates activities of Responsible Entities to secure the reliability of the bulk power system within a Reliability Assurer area and adjacent areas."</p> <p>The fact that the RA is defined in a document other than the Functional Model means consistency among definitions is needed. The FMWG agrees with the commenter that the definition of RA given in Version 5 of the Model be adopted, as modified below. (Note the removal of “within a Reliability Assurer area” and “adjacent areas,” for the same reason we removed like terms from the PC, TP and RP definitions.):</p> <p>"The functional entity that monitors and evaluates the activities related to planning and operations, and coordinates activities of functional entities to secure the reliability of the Bulk Electric System."</p> <p>Accordingly, the FMWG agrees that this term should be defined in the glossary.</p>	
<p>IRC Standards Review Committee</p>	<p>There have been many instances of the glossary being out-of-date with the Standards as well as other NERC approved materials such as the Functional Model. For example, the definition of “Blackstart Resource” as used in V2 of EOP-005 is clearly absent in the Glossary. We believe a wholesale review of the Glossary is necessary.</p>
<p>ISO New England Inc.</p>	<p>There have been many instances of the Glossary being out-of-date with the Standards as well as other NERC approved materials such as the Functional Model. For example, the definition of “Blackstart Resource” as used in V2 of EOP-005 is clearly absent in the Glossary. We believe a wholesale review of the Glossary is necessary.</p>
<p>Response: Thank you for your comment. The FMWG appreciates the suggestion to conduct a wholesale review of the glossary beyond those</p>	

Organization	Question 17 Comment
	<p>considered in the present SAR, but such work is outside the scope of this team. This suggestion would be best addressed in a separate SAR. We suggest that you consider submitting a SAR to initiate this effort.</p>
<p>Northeast Power Coordinating Council</p>	<p>There have been many instances of the Glossary being out-of-date with the Standards as well as other NERC approved materials such as the Functional Model. For example, the Quebec Interconnection is clearly absent in the Definition of Interconnection as currently exists in the NERC Glossary. We believe a wholesale review of the Glossary is necessary and would request this be included in the Scope of this SAR.</p> <p>Also, regarding the Quebec Interconnection, the below letter from Rick Sergel to Mr. Jean-Paul Theoret dated November 2, 2006 (original available): November 2, 2006 Mr. Jean-Paul Theoret President Quebec Energy Board Tour de la Bourse C.P.OOI800 Place Victoria Suite 2.55Montreal, Quebec H4Z 1 A2 Dear Mr. Theoret: Recognition of the Quebec interconnection The North American Electric Reliability Council formally acknowledges the Quebec bulk power system as a separate electric interconnection that is not synchronized with the Eastern Interconnection. We notified the NERC Operating Committee on October 3, 2006, and will update our graphics, to depict four interconnections. We will also add Quebec to the definition of "Interconnection" in our reliability standards. Sincerely, R P Sergel</p>
<p>Response: Thank you for your comment. The present SAR was intentionally limited in scope to the limited objective of achieving consistency in the definition of functional entities as they appear in different NERC documents, and doing so in a manner that would be relatively easy to implement. The wholesale review of the glossary was suggested by several commenters, and should be addressed by a separate SAR.</p>	
<p>Pepco Holdings, Inc.</p>	<p>There should be some coordination between the Functional Model and the approved standards</p>
<p>Response: Thank you for your comment. The FMWG does not believe that the proposed definition revisions will impact the standards, as written. The NERC Standards Committee will initiate a requirement-by-requirement review of the standards to determine any impact that the proposed definitions revisions may have.</p>	
<p>MRO's NERC Standards Review Subcommittee</p>	<p>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.</p>
<p>Response: Thank you for your comment. Areas are designated in the proposed definition for the functional entities having a primary role in maintaining operating reliability: BA, RC, and TOP. Upon review, the FMWG deemed it inappropriate to define areas for the planning entities.</p>	

