Unofficial Comment Form
Functional Model Advisory Group

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on Functional Model Advisory Group. Comments must be submitted by 8 p.m. Eastern, September 17, 2018.

Additional information is available on the project page. If you have questions, contact Senior Standards Developer, Latrice Harkness, or at 404-446-9728.

Background Information
The purpose of the Functional Model Advisory Group (FMAG), as outlined in the FMAG Scope document, is to (1) maintain the Functional Model (FM) and Functional Model Technical Document (FMTD) to ensure the model correctly reflects the industry today, and (2) evaluate and incorporate new and emergent reliability-related tasks. The FMAG reports to the Standards Committee (SC), and works with the Planning Committee (PC), Operating Committee (OC), and Critical Infrastructure Protection Committee (CIPC) to obtain consensus regarding any proposed changes to the FM and FMTD. Proposed revisions to the FM (and FMTD) must be posted for industry comment, receive endorsement from the technical committees – the PC, OC, and CIPC – with regard to the technical content, and ultimately, receive endorsement from the SC. Once the revisions are vetted through the industry comment period, and committee endorsement is obtained, the final versions will be posted on the NERC website.

The FM is a guidance document that attempts to identify the reliability-related tasks that the individual functional entities perform to ensure that the Bulk Electric System (BES) is planned and operated in a reliable manner. The goal of the FM is to establish a high-level task list that can be applied on a continent-wide basis, with the understanding that the functional entity’s responsibilities will vary based on the individual entity circumstances (i.e., responsibilities and relationships). The FM does not mandate the need for specific Reliability Standards nor does it make any attempt to dictate the specific compliance obligations of an entity. The FM simply makes an attempt to identify the high-level tasks that support the reliability of the BES.

The FM is not intended to identify the entities responsible for NERC registration. The NERC registration process is undertaken by NERC (and the Regional Entities) pursuant to authority from governmental authorities. The FM has no authority, ability, or intent to impact or influence the NERC Registration process.

Introduction to the Questions
The most fundamental question is whether the FM is still relevant to the industry, and if not, what if anything should replace it.
The remaining questions are of a general nature, respecting possible changes to the FM and FMTD. To the extent there is industry support to make these changes, there would be a subsequent posting containing the proposed detailed changes, in a draft version 6 of the FM and FMTD.

Industry comment was sought on the following revisions to the FM that were proposed by the FMAG in its 2016 posting:

- Consolidating ERO-related functions: In the current version of the FM, there are separate functions (and associated entities) for Standards Development, Compliance Enforcement, and Reliability Assurance. These functions are all related to ensuring the reliability of the bulk power system. The FMAG proposed that all functions related to reliability assurance be combined into the Reliability Assurance function.

- Clarifying the functions of Planning Reliability, Transmission Planning, and Resource Planning: The proposed revisions identified the differences in the various planning functions, the tasks performed by the functional entities, and how the planners work together to ensure the bulk power system has been planned to an adequate level of reliability.

- Clarifying how Interchange occurs: The proposed revisions provided clarity regarding how the various functions and functional entities work together to perform Interchange.

- Adding cyber and physical security tasks: The proposed revisions added two new tasks related to security protections for cyber assets and physical assets and communication regarding an actual or suspected threat to those assets. The new tasks were proposed to be added to the Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Owner, Interchange Coordinator, Distribution Provider, Generator Owner and Generator Operator functional entities.

In addition, industry comments to the 2016 posting identified detailed revisions to the FM’s tasks and relationships. The FMAG has retained the comments received in the 2016 posting and will address those comments in addition to any comments received during this posting.

Industry input is sought in this posting on the general proposition of whether such changes should be made. If there is support for such changes, the specific changes would also be included in the subsequent posting of version 6.

**Purpose of Comment Period**

From the SC Approved FMAG Scope of Work:

*The FMAG has identified areas in the FM and FMTD which may require updating. Any revisions to the FM should be supported by industry consensus. The FMAG proposes to obtain industry input on the scope of additional potential changes to the FM and FMTD based on the work the FMAG performed (including responses to comments received during the 2016 comment period) to address changes in reliability-related tasks and to better align the documents with actual industry practice, including:*

- Seek industry input on questions/issues/concerns with the FM and FMTD.
• The merits of making additional changes to the FM and FMTD, such as the planning functions and other functions, to reflect the most recent developments in reliability related tasks and risk mitigation objectives.

The purpose of this comment period is to obtain industry input on the scope of additional potential changes to the FM and FMTD.
Questions

1. Does the FM need to be updated any further? If yes, please explain why.
   
   ☑ Yes
   ☐ No

   Comments:

2. Does your organization use the FM and FMTD as a reference and/or resource?
   
   ☑ Yes
   ☐ No

   Comments:

3. Does your organization believe maintaining the FM and FMTD to reflect current industry practices is valuable to the industry?
   
   ☑ Yes
   ☐ No

   Comments:

4. Should the FM retain functions that have low risk to reliability such as the Interchange, Load-Serving, Market Operations, and Purchasing-Selling?
   
   ☑ Yes
   ☐ No

   Comments:

5. Should the FM be updated to consolidate ERO-related functions, namely Standards Development, Compliance Enforcement, and Reliability Assurance, into the single function, Reliability Assurance?
   
   ☑ Yes
   ☐ No

   Comments:
6. Should the FM be updated to clarify and identify the differences in the tasks performed by the three planning functional entities, the Planning Coordinator (PC), Transmission Planner (TP), and Resource Planner (RP), and how the planners work together to ensure the BES has adequate reliability planning?

☐ Yes
☐ No

Comments:

7. Should the FM be updated to clarify how Interchange occurs including how the various functions and functional entities work together to perform Interchange?

☐ Yes
☐ No

Comments:

8. Are there any additional areas that need to be revised or additional comments you may have regarding the FM or FMTD?

☐ Yes
X ☐ No

Comments: