

**California Department of Water Resources State water Project's Comments on  
"CAISO BPM Change Management MRTU Tariff Section 22.11 and 22.4.3"**

On April 30, 2007, California Independent System Operator (CAISO) posted on its website the revised version of draft Market Redesign and Technology Upgrade (MRTU) tariff language for comments by market participants. State Water Project (SWP) appreciates the opportunity to provide the comments. Following are the SWP's comments:

1. **§22.11 Operating Procedures and Business Practice Manuals Development and Amendment Process:** The sentence "The CAISO shall establish a stakeholder process as set forth in Section 22.11.1 and in a Business Practice Manual for BPM change management in order to ensure that all affected parties have an opportunity to comment on proposed changes to any Business Practice Manual" should be changed to "The CAISO shall establish a stakeholder process as set forth in Section 22.11.1 and in a Business Practice Manual for BPM change management in order to ensure that all affected parties have an opportunity to comment on proposed changes to any Operating Procedures and Business Practice Manual". Such a change will be consistent with the first sentence of this section, "The CAISO shall prepare, maintain, promulgate and update the Operating Procedures and Business Practice Manuals".
2. **§22.11.1 Process for Revisions of Business Practice Manuals:** This section states, "BPM PRRs shall be submitted electronically to the CAISO by completing the designated form provided on the CAISO Website. The BPM PRR shall include a description of the requested revision, the reason for the suggested change, the impacts and benefits of the suggested change, a BPM PRR impact analysis for BPM PRRs submitted by CAISO management, a list of affected BPM sections and subsections, general administrative information, and suggested language for the requested revision." There is an ambiguity in the underlined part of this paragraph because it indicates that a BPM PRR should have a BPM PRR impact analysis submitted by CAISO management. BPM PRR should not require an impact analysis by a market participant. The impact analysis should be done by CAISO after the submittal of a BPM or Operating Procedure PRR by a market participant or an affected entity. Market participant's impact analysis may not cover the CAISO system-wide impact and therefore does not represent the true picture of system-wide impact.