BPM Change Management Meeting

July 25, 2017

Julia Payton
BPM Change Management Process
BPM_CM@caiso.com
## Agenda – BPM Change Management Meeting, July 25, 2017

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<tr>
<th>Topic</th>
<th>Presenter</th>
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<tbody>
<tr>
<td>Introduction/meeting overview</td>
<td>Julia Payton</td>
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<tr>
<td>Discussion of current PRRs:</td>
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<tr>
<td>Generator Interconnection and Deliverability Allocation Procedures</td>
<td>Phelim Tavares</td>
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<tr>
<td>Settlements and Billing</td>
<td>Bonnie Peacock</td>
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<td>Generator Management</td>
<td>Raeann Quadro</td>
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<td>Transmission Planning Process</td>
<td>Jeff Billinton</td>
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<td>Congestion Revenue Rights</td>
<td>Jacob Fox</td>
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<tr>
<td>PRRs to be discussed at later date</td>
<td>Julia Payton</td>
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<tr>
<td>Wrap up and next steps</td>
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</tbody>
</table>
• Business Practice Manuals
  ➢ The purpose of BPMs is to set forth business practices that implement the ISO tariff.
  
   ➢ The ISO conducts a yearly policy initiative roadmap process to consider and rank initiatives.
     ➢ *Policy changes submitted through the PRR process will be referred to the policy initiative road map process.*

  ➢ Each subject area in a BPM is based on enabling language in the ISO tariff.
     ➢ *The PRR process cannot be used to introduce changes that are not supported by existing tariff authority.*
### PRRs for Discussion – Recommendation Phase
Generator Interconnection and Deliverability Allocation
Procedures BPM

<table>
<thead>
<tr>
<th>PRR</th>
<th>PRR Title</th>
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<tbody>
<tr>
<td>992</td>
<td>Submitted by Large-Scale Solar Association: Interconnection Study Information</td>
</tr>
</tbody>
</table>
• **Reason for revision:**
  - Provide information to the Interconnection Customer that can be used to support project value analysis, Power Purchase Agreement (PPA) contracting, and other development activities. While this information is not required in the tariff, it should be readily accessible to the CAISO and PTOs, so providing it in Interconnection Studies should not be burdensome. The information is not easily accessible to Interconnection Customers, especially in these earlier development stages.

• **Recommendation Comments:** No comments submitted

• **ISO posted a response to PRR submittal and initial comments on 6/20/17**

• **Recommendation comment period expiration:**
  - July 21, 2017

• **Next step:** Post Final Decision
PRRs for Discussion – Recommendation Phase
Settlements and Billing BPM

<table>
<thead>
<tr>
<th>PRR</th>
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<tbody>
<tr>
<td>993</td>
<td>Updated the Settlements and Billing BPM main body to clarify dispute process requirements</td>
</tr>
<tr>
<td>PRR</td>
<td>CC/PC</td>
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| 993 | Settlements and Billing Main Body | Recommendation comments: WAPA 7/14/17  
ISO Response to comment posted 7/18/17  
Recommendation comment period expired 7/14/17; Next Step: Post the Final Decision | The dispute sections of the Settlements and Billing BPM main body have been updated to clarify dispute processing descriptions and requirements. The ISO is reviewing and revamping the dispute process in order to provide better customer service and ensure disputes are resolved in a timely manner. To that end and consistent with current business practices, the ISO has clarified the type of information the Scheduling Coordinator should provide to assist in the timely review of the dispute as well as the manner in which the ISO responds. Specifically, in the absence of the needed information the dispute will be rejected. Additionally, the ISO has clarified the recurring disputes information and the dispute evaluation details. |
### PRRs for Discussion – Recommendation Phase
Generator Management BPM

<table>
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<tr>
<th>PRR</th>
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<tbody>
<tr>
<td>994</td>
<td>Clarifying changes to generator retirement process</td>
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</table>
PRR 994 – Clarifying changes to generator retirement process

• Reason for revision:
  – The CAISO submits these changes to clarify the process for retiring or mothballing a generating unit, specifically, the changes clarify the method for determining the retained deliverability, and re-categorizes the “Mothball” process to Scenario 4, with disclaimer pursuant to the Temporary Suspension of Resource Operations Stakeholder initiative.

• Recommendation Comments:
  – No comments submitted

• ISO submitted PRR on 6/1/17

• Recommendation comment period expiration:
  – July 21, 2017

• Next step: Post Final Decision
## PRRs for Discussion – Initial Phase
Generator Interconnection and Deliverability Allocation Procedures BPM

<table>
<thead>
<tr>
<th>PRR</th>
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<tbody>
<tr>
<td>995</td>
<td>Submitted by Large-Scale Solar Association: Clarifications of partial security release for failure to secure a PPA</td>
</tr>
<tr>
<td>997</td>
<td>Submitted by Large-Scale Solar Association: Third interconnection financial security posting process clarifications</td>
</tr>
</tbody>
</table>
PRR 995 – Clarifications of partial security release for failure to secure a PPA

• Reason for revision:
  – Clarify that a generation project that acquires a PPA but later loses it through factors beyond its control would still qualify for partial security release.
  – Clarify that the partial release for this reason would be based on the amount of project capacity under the PPA.

• Initial Comments:
  – Pacific Gas and Electric Company 7/3/17
  – San Diego Gas and Electric Company 7/3/17
  – Southern California Edison 7/3/17

• ISO Response to PRR and Comments:
  – Posted July 18, 2017

• Initial comment period expired:
  – July 3, 2017

• Next step: ISO Post Recommendation
PRR 997 – Third interconnection financial security posting process clarifications

• Reason for revision:
  – Clarify the process for requesting the third Interconnection Financial Security posting and ensure that the Interconnection Customer has sufficient time to provide the required security.
  – Demonstrate that a requested third Interconnection Financial Security posting is due under the CAISO tariff.

• Initial Comments:
  – Pacific Gas and Electric Company 7/3/17
  – San Diego Gas and Electric Company 7/3/17
  – Southern California Edison 7/3/17

• ISO Response to Comments:
  – Posted July 18, 2017

• Initial comment period expired:
  – July 3, 2017

• Next step: ISO Post Recommendation
### PRRs for Discussion – Initial Phase
Generator Management BPM

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<tr>
<td>996</td>
<td>Submitted by Large-Scale Solar Association: Additional transmission-project in-service date revision clarifications</td>
</tr>
<tr>
<td>1000</td>
<td>Commercial operation date extensions for independent study process projects</td>
</tr>
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PRR 996 – Additional transmission-project in-service date revision clarifications

• Reason for revision:
  – Clarify and recognize that: (1) This provision should apply to Network Upgrade delays even of those Network Upgrades are approved in the TPP and not the interconnection process; and (2) Delivery Network Upgrade delays can also impact generation-project development and financial viability., so delays in construction of those upgrades should be included in the BPM notice and COD delay provisions.

• Initial Comments:
  – Pacific Gas and Electric Company 7/3/17
  – San Diego Gas and Electric Company 7/3/17

• ISO Response to Comments:
  – The ISO generally supports the PRR and recommends moving forward with the PRR with modifications. ISO response posted 7/19/17.

• Initial comment period expired:
  – July 3, 2017

• Next step: ISO Post Recommendation
• Reason for revision:
  – Independent Study Process (ISP) Commercial Operation Date modification guidance is currently only listed in the Tariff and the BPM for GIDAP. This PRR adds that information to the BPM for Generator Management as well.

• Initial Comments:
  – San Diego Gas and Electric Company 7/17/17

• ISO Response to Comments:
  – The ISO agrees with SDG&E’s comments and proposes to modify the PRR and use the term to “Deliverability Network Upgrades”.

• Initial comment period expired:
  – July 17, 2017

• Next step: ISO Post Recommendation
## PRRs for Discussion – Initial Phase
Transmission Planning Process BPM

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<tr>
<td>998</td>
<td>Submitted by Large-Scale Solar Association: Transmission-project in-service date revision clarifications</td>
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PRR 998 – Transmission-project in-service date revision clarifications

• Reason for revision:

  (1) Clarify that CAISO not only approves transmission projects but must also approve their delay (including placement “on hold”) and/or cancellation. The current BPM language describes the initial CAISO approval process extensively but is not clear about schedule delays. (2) Document the current practice (stated numerous times in TPP stakeholder meetings but not explicit in the BPM) that delays and cancellations are only approved after consideration of their impacts on both system reliability and generation-project development. (3) Clarify that mitigation plans should be considered if unavoidable delays or cancellations would impact generation-project development. (4) Clarify and recognize that deliverability delays can also impact generation-project development and financial viability. Thus, delays in construction of those upgrades should be included.

• Initial Comments:
  – Pacific Gas and Electric Company 7/3/17
  – Southern California Edison 7/3/17

• ISO Response to PRR and Comments:
  – Posted response 7/24/17

• Initial comment period expired:
  – July 3, 2017

• Next step: ISO Post Recommendation
## PRRs for Discussion – Initial Phase

Congestion Revenue Rights BPM

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<tr>
<td>999</td>
<td>General language cleanup and trading hub retirement process</td>
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PRR 999 – General language cleanup and trading hub retirement process

• Reason for revision:
  — Clarification of example and general cleanup and description of modification to trading hub process.

• Initial Comments:
  – No comment submitted

• Initial comment period expired:
  – July 14, 2017

• Next step:
  – ISO Post Recommendation
Next Steps

Next Meeting:
August 22, 2017

BPM Change Management Process
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