

Memorandum

To: ISO Board of Governors
From: Stacey Crowley, Vice President, External and Customer Affairs
Date: September 15, 2021
Re: **Business practice manual change management report**

This memorandum does not require Board action.

As required by the Federal Energy Regulatory Commission, Management provides this report to inform the ISO Board of Governors on the status of the business practice manual change requests submitted by stakeholders and/or the California ISO.

The ISO inaugurated the public change management process for business practice manuals (BPMs) on April 1, 2009. Both the ISO and stakeholders use the same electronic system and process to submit and track proposed changes to the BPMs. The process includes stakeholder review, ISO approval or rejection, and a possible appeal to the BPM Appeals Committee, which is comprised of three ISO officers.

As of September 3, 2021, the following table represents the active Proposed Revision Requests (PRRs) in the BPM change management system.

Business Practice Manual (BPM)	# of PRR's
Candidate CRR Holder Registration	1
Direct Telemetry	2
Energy Imbalance Market	1
Managing Full Network Model	1
Market Instruments	1
Market Operations	5
Reliability Requirements	4
Settlements and Billing	8
Transmission Planning Process	1
Total	24

PROCESS OVERVIEW

The ISO held two monthly BPM change management stakeholder meetings since the submittal of the previous Board report. There was a stakeholder meeting on July 27, 2021, in which twenty-eight stakeholders participated, and August 24, 2021, in which twenty-nine stakeholders participated. Based on stakeholder comments during the meeting and comments entered into the BPM change management electronic system, it appears that stakeholders are generally satisfied with the process.

BPM CHANGE MANAGEMENT REPORT

In compliance with the tariff reporting requirements, attachment 1 of this report:

- States the total number of active PRRs submitted by stakeholders and/or by the ISO;
- Depicts the active PRRs in various stages along the PRR lifecycle;
- Provides details pertaining to the active PRRs; and
- Provides final decision status regarding PRRs that were closed either by adoption or rejection.

ADDENDUM

This report includes two PRRs that have been withdrawn from the BPM Change Management Process. The details on these PRRs is as follows:

PRR 1280 -

- **Title:** Local regulatory authority resource adequacy adjustments
- **Affected BPM:** Reliability Requirements
- **Reason for revision:** Process for local regulatory authority resource adequacy (LRA RA) adjustments (credits) submission and when/how they can be applied.
- **Reason for withdrawal:** Despite the ISO's engagement in significant outreach with LRAs that historically have granted their jurisdictional LSEs with credits toward meeting their RA obligation, there remains a high level of contention among stakeholders surrounding this PRR. The ISO has committed to continuing its efforts with affected stakeholders to work through concerns raised by pursuing PRR 1280, but has concluded the best path forward at this time is to withdraw PRR 1280. A [written statement](#) from ISO staff detailing the reason for withdrawal and next steps was posted to the ISO website on August 25, 2021.
- **Next steps:** ISO staff will consider at a later date whether it needs to pursue the changes proposed through PRR 1280 through a new PRR or some other mechanism.

PRR 1375 -

- **Title:** Update configuration guides to reflect change in short and long start definitions
- **Affected BPM:** Settlements and Billing
- **Reason for revision:** There are inconsistencies in the use of short, medium, and long start resource definitions in the Tariff, BPMs, in the market as used for optimization, and in Settlements. This change is to align all these documents and related processes when referring to resource start definitions.
- **Reason for withdrawal:** The Short-Long Start Definition Update effort has been put on hold, pending a decision from members of the ISO's executive leadership team on whether Board of Governors or EIM Governing Body approval is needed. Therefore, the team has chosen to withdraw the PRR from the BPM Change Management process at this time.