

Memorandum

To: ISO Board of Governors
From: Tom Doughty, Vice President, Customer and State Affairs
Date: December 5, 2018
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 the California Independent System Operator Corporation.

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 November 26, 2018, eighteen proposed revision requests (PRRs) were active in the BPM change management system. Seventeen PRRs were submitted by the ISO, and one PRR was submitted by San Diego Gas & Electric Company. These eighteen active PRRs affect the following BPMs:

- Congestion Revenue Rights (1 request)
- Energy Imbalance Market (2 requests)
- Managing Full Network Model (2 requests)
- Market Operations (2 requests)
- Outage Management (1 request)
- Reliability Coordinator Services (1 request)
- Reliability Requirements (2 requests)
- Settlements and Billing (7 requests)

PROCESS OVERVIEW

The ISO held one monthly BPM change management stakeholder meetings since the submittal of the previous Board report. There was a stakeholder meeting on October 23,

2018, in which forty-eight 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 by the ISO;
- Depicts the active PRRs in various steps along the PRR lifecycle, as of November 26, 2018;
- Reflects that twelve PRRs were in final decision status within the period October 24, 2018 through November 26, 2018; and
- Includes PRRs currently under stakeholder appeal, the stakeholder positions on rejected PRRs, and the reasons for rejection.

The following is additional relevant information:

- There is one PRR currently under stakeholder appeal. Although stakeholder withdrawal of the appeal is anticipated, since the appeal is outside the scope of the proposed revision request BPM language change.
- There were no rejected PRRs.
- There were four active PRRs submitted into the electronic system by the ISO on an emergency basis.

A PRR report summarizing the content of each active PRR in the BPM change management system as of November 26, 2018 is included as attachment 2.