

# Memorandum

**To:** ISO Board of Governors  
**From:** Karen Edson, Vice President, Policy and Client Services  
**Date:** September 11, 2014  
**Re:** **Business practice manual change management activities update**

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***This memorandum does not require Board action.***

This memorandum is a regular report required by the Federal Energy Regulatory Commission 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 August 28, 2014, twenty-six proposed revision requests (PRRs) were active in the BPM change management system and were all submitted by the ISO. These twenty-six active PRRs impact the following BPMs:

- Definitions and Acronyms (1 request)
- Direct Telemetry (1 requests)
- Energy Imbalance Market (1 request)
- Generator Interconnection Procedures (1 request)
- Generator Interconnection and Deliverability Allocation Procedures (2 requests)
- Managing Full Network Model (2 requests)
- Market Instruments (2 requests)
- Market Operations (3 requests)
- Queue Management (2 requests)
- Reliability Requirements (1 request)
- Scheduling Coordinator Certification and Termination (1 request)
- Settlements and Billing (9 requests)

## **PROCESS OVERVIEW**

The ISO held monthly BPM change management stakeholder meetings on June 24, 2014, where twelve stakeholders participated, July 22, 2014, where 26 stakeholders participated, and August 26, 2014, where 36 stakeholders participated. Based on stakeholder comments during the meetings, and on the types of 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 August 28, 2014;
- Reflects that eleven PRRs were in final decision status for the period June 21, 2014 through August 28, 2014; 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 are no PRRs under stakeholder appeal.
- Two PRRs were submitted into the electronic system by the ISO on an emergency basis.

Two emergency PRRs were submitted in the recent weeks. They were related to BPM language changes that resulted from the outage management system replacement and penalty price for over-procurement in residual unit commitment. Submitting emergency PRRs enables the ISO to expedite language changes while the PRRs remain under consideration in the BPM change management process.

A PRR report summarizing the content of each active PRR in the BPM change management system as of August 28, 2014, is included as attachment 2.