

# Memorandum

**To:** ISO Board of Governors  
**From:** Stacey Crowley, Vice President, External and Customer Affairs  
**Date:** December 9, 2020  
**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 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 25, 2020, 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
Demand Response	1
Energy Imbalance Market	2
Generator Interconnection and Deliverability Allocation Procedures	3
Generator Management	1
Market Instruments	1
Market Operations	3
Reliability Coordinator Services	1
Reliability Requirements	3
Scheduling Coordinator Certification and Termination	1
Settlements and Billing	12
<b>Total</b>	<b>29</b>

## **PROCESS OVERVIEW**

The ISO held one monthly BPM change management stakeholder meeting since the submittal of the previous Board report. There was a stakeholder meeting on November 17, 2020, in which twenty-four 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.

## **BPM APPEALS PROCESS**

Stakeholders have the right to appeal the final decision of a proposed revision request (PRR). Upon appeal, an ISO executive appeals committee conducts a public session to hear stakeholder positions and then posts a written decision. The ISO Executive Appeals Committee is comprised of the Chief Executive Officer, General Counsel, and Vice President of External and Customer Affairs.

On November 13, 2020, CEDMC, CLECA, CPUC, MWD, PG&E, and SCE filed appeals on [PRR 1280](#) Local Regulatory Authority Resource Adequacy Adjustments, which affects the BPM for reliability requirements. PRR 1280 is intended to ensure consistent treatment of all resource adequacy resources under the ISO tariff by requiring resources that are counted towards meeting resource adequacy obligations to be shown on resource adequacy supply plans.

The ISO held an Executive Appeals Committee Meeting on December 1, 2020, where the Committee heard from the six appellants, ISO staff, and other interested stakeholders. The written decision of the Committee, which directs ISO staff to hold the BPM amendments related to PRR 1280 in abeyance until August 1, 2021, was posted to the ISO website on December 9, 2020. All relevant materials on this issue can be viewed [here](#).