

Memorandum

To: ISO Board of Governors
From: Stacey Crowley, Vice President, External and Customer Affairs
Date: November 11, 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 October 29, 2020, the following table represents the active Proposed Revision Requests (PRRs) in the BPM change management system.

Business Practice Manual (BPM)	# of PRR's
Demand Response	1
Energy Imbalance Market	2
Generator Interconnection and Deliverability Allocation Procedures	2
Generator Management	1
Market Instruments	1
Market Operations	3
Reliability Coordinator Services	1
Reliability Requirements	3
Settlements and Billing	9
Total	23

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 September 29, 2020, in which fifty stakeholders participated, and October 27, 2020, in which fifty-six stakeholders participated. Based on stakeholder comments during the meetings and comments entered into the BPM change management electronic system, it appears that stakeholders are generally satisfied with the process.

There are, however, two PRRs included in this report that have caused concern with stakeholders: [PRR 1280](#) Local Regulatory Authority Resource Adequacy Adjustments, and [PRR 1282](#) Scheduling of Export Resources in the Real Time Market.

PRR 1280 is intended to ensure consistent treatment of all resource adequacy (RA) resources under the ISO tariff by requiring resources that are counted towards meeting RA obligations to be shown on RA supply plans. Stakeholders have expressed concerns, and we will continue to work with them through the process.

PRR 1282 aims to improve the scheduling of resources in the residual unit commitment and real time market process based on expected priorities for exports. Overall, stakeholders support the goals of this PRR, but share concerns regarding how the change will affect the process for scheduling and prioritizing exports. In response to stakeholder comments and discussion during the October BPM change management monthly meeting, the ISO has placed this PRR on hold until more comprehensive language is developed to address stakeholder concerns.

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.