



California ISO

Metering Rules Enhancements Stakeholder Initiative

Revised Straw Proposal

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Metering Rules Enhancements

Stakeholder Initiative

Revised Straw Proposal

1 Changes from issue paper and straw proposal and response to stakeholder comments

Stakeholders broadly support the ISO's proposal made in the February 23, 2016, issue paper and straw proposal.¹ No stakeholders take an opposed position. However, stakeholders request clarification and seek more information on some elements of the ISO's proposal. Rather than changing its proposal, the ISO uses this revised straw proposal to elaborate on its proposal and provide the additional information and clarification sought by stakeholders.

A general point of clarification is that the focus of this initiative is on meter data used in market settlements. This initiative addresses the process used by the ISO, ISO metered entities (ISOME), and scheduling coordinators for scheduling coordinator metered entities (SCME) to obtain settlement quality meter data (SQMD) used for the settlement of ISO markets. This initiative does not directly address meter or telemetry data used in operations.

In the previous paper² the ISO organized its proposal into three elements. The ISO has retained this same approach in this paper for the same elements of the proposal. These elements are: (1) Provide existing metered entities the option to retain current requirements and maintain their status quo, or instead to opt for elements 2 and 3; (2)

¹ The CAISO received comments from NRG, Pacificorp, Pacific Gas & Electric, Southern California Edison, and the Six Cities.

² The February 23, 2016, Issue Paper and Straw Proposal is available on the initiative webpage at <http://www.caiso.com/informed/Pages/StakeholderProcesses/MeteringRulesEnhancements.aspx>

Allow SCs the option to submit SQMD for all resources represented; and (3) Require submittal of an SQMD Plan by SCs opting to submit SQMD for all resources represented.

Besides these three proposal elements, this paper includes a fourth area in which the ISO proposes changes to certain ISOME requirements to address exemption requests.

The following is a summary of the additional information and clarification provided in this paper.

Section 2 - Background

The ISO has expanded this section to provide additional background on the current rules describing the difference between ISOME and SCME. This discussion should provide a clearer foundation for the ISO proposal.

Section 5.1 – No required changes to existing metered entities

The ISO has expanded this section to provide more clarity on this element of the proposal including existing ISOME operating under an exemption. This section also proposes that new EIM entities that choose the SCME option (i.e., rather than ISOME) would generally be ineligible for exemptions, but would instead be required to submit an SQMD Plan.

Section 5.2 – Allow SCs to submit SQMD for all resources represented

The ISO has expanded this section to provide more clarity on this element of the proposal. This includes addressing stakeholder concerns about maintaining the accuracy and integrity of meter data for market settlements, providing clarity on which existing SCME requirements will continue or change, the standing of exemptions possessed by an ISOME if such an entity opts to become an SCME, and calculation or derivation of load.

Section 5.3 – SQMD Plan

The ISO has expanded this section to provide more clarity on this element of the proposal. More significantly, the ISO has developed a draft SQMD Plan and added that to the paper as Attachment A.

Section 5.4 – Modifications to ISOME requirements

As suggested in the previous paper, the ISO believes that certain exemption requests frequently requested and granted may indicate where a change in the associated ISOME requirement merits consideration. The ISO proposes to modify a particular ISOME requirement and discusses it in section 5.4.

2 Introduction

The energy landscape has seen dramatic change in recent years: growth in renewables, demand response, energy storage, and distributed energy resources; expansion of regional markets through the energy imbalance market; and the potential integration of other balancing authority areas into the ISO balancing authority area (BAA). With this change have been advancements in metering technology and developer interest in new and complex metering configurations.

Through prior stakeholder initiatives, the ISO has considerably tried to review its metering requirements and propose revisions to accommodate some of this change and provide additional flexibility to market participants. Many of these efforts have led to expanded use of SCME.

The ISO and stakeholders through this initiative will develop and propose additional metering rules enhancements to the process and procedures used by the ISO, ISOME, and scheduling coordinators for SCME, to obtain SQMD used for the settlement of ISO markets. From the outset, however, it is important to stress that one principle will not change — the need to maintain the accuracy and integrity of meter data for market settlements.

The ISO finds that developing enhanced metering requirements will necessitate balancing multiple objectives. These objectives include, among others, reducing cost barriers to participate in the ISO market, accommodating new and complex metering configurations, integrating other BAAs, leveraging local regulatory authority metering requirements, considering existing metering requirements and infrastructure investments, and maintaining the accuracy and integrity of meter data used in market settlements.

In this paper, the ISO provides background information on the existing process and procedures used by the ISO, ISOME, and scheduling coordinators for SCME, to obtain SQMD. This paper also includes the ISO's revised straw proposal on a set of proposed enhancements for stakeholder consideration.

The ISO is targeting completion of the policy development phase of this initiative (i.e., seeking approval of the ISO Board) by September of this year.

3 Background

The ISO tariff defines SQMD as “Meter data gathered, edited, validated, and stored in a settlement-ready format, for settlement and auditing purposes.”³ ISO market settlement requires SQMD for generation, load, and tie resources. Said another way, SQMD is used for billable quantities to represent the energy generated or consumed during a settlement interval. The tariff provides the requirements for the processing of raw meter data, obtained from meters, to produce SQMD.

SQMD is obtained from two different sources: ISOME (meter data directly polled by the ISO) and SCME (meter data submitted to ISO by scheduling coordinators). ISOME and SCME each have their own tariff provisions for metering and providing meter data for ISO settlements.

3.1 ISOME

The ISO tariff defines an ISOME as:

- (a) any one of the following entities that is directly connected directly to the ISO controlled grid:
 - i. a Generator other than a Generator that sells all of its Energy (excluding any Station Power that is netted pursuant to Section 10.1.3) and Ancillary Services to the Utility Distribution Company (UDC) or Small UDC in whose Service Area it is located;
 - ii. a metered subsystem (MSS) Operator; or
 - iii. a UDC or Small UDC; and
- (b) any one of the following entities:
 - i. a Participating Generator;
 - ii. a Participating Transmission Owner (TO) in relation to its Tie Point Meters with other TOs or Balancing Authority Areas (BAAs);

³ Appendix A of the ISO tariff.

- iii. a Participating Load;
- iv. a Participating Intermittent Resource;
- v. an Energy Imbalance Market (EIM) Participating Resource that has elected not to be a SCME, with regard to the EIM Resources it specifies that it represents as a ISOME; or
- vi. a utility that requests that Unaccounted For Energy (UFE) for its Service Area be calculated separately, in relation to its meters at points of connection of its Service Area with the systems of other utilities.⁴

ISOME revenue quality meters are directly polled by the ISO's revenue meter data acquisition and processing system (RMDAPS)⁵. The ISO also retrieves data from the meters that provides information on the health of the meters (e.g., error logs, back up battery status, etc.). The ISO takes the raw unedited meter data and performs the validation, estimation, and editing (VEE) procedures to produce actual SQMD. The ISO does not accept meter data from an ISOME unless that meter data is produced by metering facilities certified in accordance with section 10 of the ISO tariff and section 5 of the Business Practice Manual (BPM) for Metering. An ISOME must sign a meter service agreement for ISOME (MSA CAISOME) with the ISO. The MSA only applies to those entities that the ISOME represents. Such agreements specify that ISOME make RQMD available to the RMDAPS and identify other authorized users that are allowed to access meter data relating to the ISOME.

3.2 SCME

The ISO tariff defines an SCME as an entity that is:

1. a Generator, Eligible Customer, End-User, Reliability Demand Response Resource (RDRR), or Proxy Demand Resource (PDR) that is not an ISOME;
2. an EIM Entity; and

⁴ Appendix A to the ISO tariff.

⁵ Appendix A to the ISO tariff defines RMDAPS as "A collective name for the set of CAISO systems used to collect, validate, edit and report on Revenue Quality Meter Data."

3. an EIM Participating Resource that elects to be a SCME with regard to some or all of the EIM Resources it represents.⁶

For SCME, the SC for an SCME submits SQMD directly into the ISO's settlement quality meter data system (SQMDS).⁷ SCs are responsible for obtaining any necessary approval of the relevant LRA to its proposed security and VEE procedures. The ISO performs no VEE procedures on the actual or estimated SQMD it receives from SCs for SCME. The ISO does not accept SQMD relating to an SCME unless produced by metering facilities certified in accordance with the certification or similar criteria prescribed by the relevant LRA.⁸ If the LRA has prescribed no certification criteria for the metering facilities, then the certification criteria prescribed for ISOME by section 5 of the Metering BPM apply. While adhering to the requirements of the applicable LRA, SCME must produce SQMD submitted to the ISO in accordance with the ISO's payment calendar for market settlement calculations. All SCs that submit SQMD must perform an annual SC self-audit. In this audit, the SC takes all the actions to support an attestation they have completed the audit and are processing their meter data in accordance with their requirements. An SC for an SCME must sign a meter service agreement for scheduling coordinators (MSA SC). Such agreements specify that SCs require their SCME to adhere to the meter requirements of the ISO tariff.

3.3 ISO Responsibilities

The ISO is responsible for establishing and maintaining the RMDAPS and the SQMDS. The ISO is also responsible for (1) setting standards and procedures for the registration, certification, auditing, testing, and maintenance of revenue quality meters; and (2) establishing procedures for the collection, security, validation, and estimation of meter data affiliated with ISOME.

⁶ Appendix A to the ISO tariff.

⁷ Appendix A to the ISO tariff defines SQMDS as "A collective name for the set of CAISO systems used to accept, analyze and report on Settlement Quality Meter Data."

⁸ The ISO may require SCs to provide it with a copy of any certificate issued by the LRA.

3.4 Unaccounted for energy

Besides settling the market for generation and load, the ISO settles unaccounted for energy (UFE). UFE is the difference between net energy delivered and total measured demand.⁹ The difference is attributable to metering or modeling errors, theft, or distribution loss deviations. The ISO performs UFE calculations for each of the utility service areas within its BAA.

3.5 Exemptions

Understanding ISO rules and practices relating to metering requirement exemptions are also critical to the development of metering rules enhancements in this initiative. The ISO has the authority to grant exemptions from certain ISO metering standards for ISOME.¹⁰ The ISO does not grant exemptions from metering standards for SCME in today's market except for those participating within the Energy Imbalance Market (EIM). Besides exemptions granted to individual ISOME, the ISO may grant exemptions that apply to a class of entities. The ISO has granted class exemptions for FERC Order No. 764 and for EIM. The ISO publishes a list of all exemptions granted in the Metering Exemptions Listing Report.¹¹

An example of a common exemption is regarding use of a modem. This may occur when the site has no feasible option for an Energy Communications Network (ECN) connection due to monetary constraints or high-speed access is not available.

⁹ The tariff defines UFE as "The difference in Energy, for each utility Service Area and Settlement Period, between the net Energy delivered into the utility Service Area, adjusted for utility Service Area Transmission Losses, and the total Measured Demand within the utility Service Area adjusted for distribution losses using Distribution System loss factors approved by the Local Regulatory Authority. This difference is attributable to meter measurement errors, power flow modeling errors, energy theft, statistical Load profile errors, and distribution loss deviations. For EIM Market Participants, the CAISO will calculate Unaccounted For Energy based on the EIM Entity Balancing Authority Area instead of the utility Service Area." Appendix A of the ISO tariff.

¹⁰ Sections 10.2.12 and 10.4 of the ISO tariff.

¹¹ The Metering Exemptions Listing Report was last updated on April 4, 2016, and is available at: <http://www.caiso.com/Documents/MeteringExemptionsListingReport.pdf>

To avoid having to make an exemption request as an ISOME, a new market entity could instead opt to be SCME and submit an SQMD Plan as described in this paper. However, this may not be the best outcome because although some market participants may find ISOME more suitable to their situation, they may opt for SCME to avoid an exemption request. As suggested in the previous paper, the ISO believes that certain exemption requests frequently requested and granted may indicate where a change in the associated ISOME requirement merits consideration. The ISO proposes to modify a particular ISOME requirement and discusses it in section 5.4.

4 Initiative Schedule

Milestone	Date
Issue Paper and Straw proposal posted	February 23
Stakeholder web conference	March 3
Stakeholder comments due	March 17
Revised Straw Proposal posted	April 19
Stakeholder web conference	April 26
Stakeholder comments due	May 10
Draft Final Proposal posted	June 7
Stakeholder web conference	June 14
Stakeholder comments due	June 28
Board of Governors Meeting	August 31–September 1

5 Revised straw proposal

The ISO's revised straw proposal to enhance its metering rules comprises the three elements summarized below. Besides these three elements, this paper includes a fourth area in which the ISO proposes changes to certain ISOME requirements to address exemption requests. Subsequent sections discuss each in more detail.

1. No required changes to existing metered entities. This first element of the ISO's proposal provides existing metered entities the option to retain current requirements and maintain their status quo, or instead to opt for elements 2 and 3 (see the second and third proposal elements below). This will allow existing metered entities, whether ISOME or SCME, to maintain compliance with their metering infrastructure and requirements without being required to change to new tariff requirements unless they elect to do so. Submission of an SQMD Plan would not be required for these metering entities (see the third proposal element below).
2. Allow SCs to submit SQMD for all resources represented. This second element of the ISO's proposal will provide market participants with greater flexibility by allowing SCs to submit SQMD for load, generation, and inertia/intrastate resources. Under this option SCs would be able to:
 - a. Acquire, process, and submit SQMD for generation resources they represent.
 - b. Acquire, process, and submit SQMD for their load resources by following the requirements of an applicable LRA, or by calculating their load from revenue grade tie and generator metering devices.
 - c. Process and submit SQMD for tie resources when the interchange checkout data is unavailable.
3. SQMD plan. This third element of the ISO's proposal requires submittal of an SQMD Plan by SCs for those SCME resources it represents (the same SC may also represent one or more ISOME as well but would not submit an SQMD Plan for the ISOME it represents). This element of the proposal ensures that the second element of the proposal will not compromise the integrity of settlement data. Here, SCs that provide SQMD for all SCME resources they represent would be required to develop and submit a SQMD Plan. The SQMD Plan would indicate how

the entity would securely and accurately install, maintain, and calibrate measurement equipment to ensure that data produced, collected, and used in developing submitted SQMD meets accuracy standards established by the ISO. The SQMD Plan would include identification of processes used in the establishment of submitted SQMD. The SC would be required to meet all existing SCME metering requirements including to perform an SC self-audit and attest to meeting any requirements of an applicable LRA.

In the following subsections, the ISO discusses these proposal enhancements in more detail. Following that is a discussion of proposed modifications to certain ISOME requirements.

5.1 No required changes to existing metered entities

The ISO believes that existing metered entities, whether ISOME or SCME, should be able to maintain their existing compliance status without being required to change to new tariff requirements. Therefore, under this proposal, these existing metering entities are not required to submit an SQMD Plan (see section 5.3 below) even if they are SCME.

Existing ISOME have already invested in metering infrastructure, communication, and maintenance plans. The ISO proposal will allow these entities to continue with their present practices unless they opt to take advantage of the options provided in this proposal (see proposal elements 2 and 3 below in sections 5.2 and 5.3, respectively).¹²

Similarly, this proposal respects LRA requirements. If the entities the SC represents are under the jurisdiction of an LRA (e.g., CPUC-jurisdictional bundled service customer load), they may continue to process their meter data under their existing requirements.

An existing ISOME possessing an exemption from metering requirements may continue or opt to become an SCME. If this ISOME opts to become an SCME, then what was a meter exemption under ISOME must be documented in the SQMD Plan.

Following implementation of this proposal all new market participants, including those electing to participate within EIM, that choose the SCME option would not need to

¹² This proposal does not address the process involved if an existing metered entity requests to become subject to the new rules. That is a business process that would be developed during implementation. It suffices here to say that existing entities will be allowed to opt into the new rules if they desire.

request an exemption from ISO metering requirements for a resource, but would instead submit an SQMD Plan.

5.2 Allow SCs to submit SQMD for all resources represented

To provide market participants with greater flexibility, the ISO is proposing to allow SCs the option to submit SQMD for load, generation, and intertie/intrastate resources.¹³ SCs that elect to take advantage of this option will be required to develop and submit an SQMD Plan (see section 5.3 below).

The ISO is not proposing to extend this option to metered subsystems (MSS)¹⁴. MSS will be required to maintain existing metering requirements.

Entities participating in the ISO market today use one or more of the following three methods to process meter data for use in ISO settlement.

Existing methods

1. ISOME — the ISO acquires the RQMD, performs VEE and creates SQMD used for settlement.
2. SCME — the SC submits the SQMD from meters that meet LRA-approved metering and processing requirements. The SC submits an annual SC Self-Audit Report.
3. Allow the ISO to use the meter flows from approved meters at the interties.

Under its proposal, the ISO is proposing to supplement these existing methods for acquiring and processing meter data used in ISO market settlement with the following two new methods.

¹³ The ISO is aware that some power purchase agreements may require a resource to be an ISOME, and as a result, there will be existing ISOME that opt to remain as ISOME and some future entities that will opt to be ISOME.

¹⁴ A MSS is a geographically contiguous system operating as an electric utility for a number of years prior to the ISO market operations as a municipal utility, water district, irrigation district, state agency or federal power marketing authority, subsumed within the ISO BAA, encompassed by ISO certified revenue quality meters at each interface point with the ISO controlled grid and ISO certified meters on all resources internal to the system, and operated in accordance with a MSS agreement.

Proposed new methods

4. The SC submits calculated SQMD from metering devices qualified in its SQMD Plan. For aggregated load values of a default load allocation point (DLAP), the SC may calculate their SQMD from qualified tie and generator metering devices. One stakeholder questioned whether this proposed new method means that the ISO will accept a calculated value for load from LSEs. In response, the ISO clarifies that only EIM entities and those ISOME affiliated with MSS and/or electing their own UFE calculation may calculate (i.e., derive) their load used in settlements today. The ISO proposes that it will accept the method approved by the LRA or that which is in an approved method outlined within the SQMD Plan.
5. The SC submits SQMD for tie data from flow meters qualified in its SQMD Plan.

The ISO has developed the following table to compare the methods each type of entity would use to process meter data under both the three existing methods and the two proposed new methods. The numbered values in the table refer to the methods outlined in the previous list.

Comparison of Existing Methods (i.e., 1, 2, 3) to Proposed New Methods (i.e., 4, 5) for Submittal of SQMD		
Entity Type	Present Requirements	Proposed Options
Generator – Provides regulation and/or AS	1	1, 2, 4
Generator – Provides energy Only (e.g., Diablo Canyon)	1	1, 2, 4
Generator – Provides energy to UDC in whose territory they reside (e.g., QF)	2	2, 4

Generator – Tie Generator – Pseudo Tie	1, 3	1, 3, 4
Load – Individual grid connected	1, 2	1, 2, 4
Load – DLAP	1, 2	1, 2, 4
Load - EIM	2	4
Intertie – BA to BA	3 (a few 1s)	3
Intratie – UDC-UDC	1	1, 5
MSS	1	1
Distributed Energy Resources (DER)	2	2, 4
Demand response (PDR/RDRR)	2	2

The intent of the ISO proposal is to provide market participants with metering flexibility while continuing to maintain the high level of meter data accuracy and integrity that exists today. Besides current UFE practices, the ISO will continue to utilize existing controls such as audit and testing of the metering facilities and data handling and processing procedures of SCs and SCME to ensure that meter data accuracy and integrity is maintained.

The SCME will still be responsible for testing and monitoring its metering devices. Each SC shall at least annually test the metering facilities of the SCME it represents and self-audit the meter data provided to ensure compliance with all LRA requirements. SCs shall undertake any other actions reasonably necessary to ensure the accuracy and integrity of the SQMD provided by them to the ISO. ISO tariff sections 10.3.10 and Metering BPM section 6.3.1 will continue to apply.

The ISO is not proposing to impose any size restrictions on SCME. However, existing rules to participate in the ISO market—such as minimum size—would remain unchanged by this proposal.

The SCME will not be required to submit similar metering documentation required of an ISOME. However, the metering devices will be required to meet existing LRA requirements. If there is no relevant LRA, then the SCME will be required to meet or exceed existing ISOME metering specifications outlined in Metering BPM Attachments A and B and noted within their SQMD Plan.

SCME participation will maintain existing SCME metering requirements, which include the execution of an MSA by the SC responsible for providing its SQMD. Only with ISOME must the resource owner (rather than the SC) execute an MSA.

All meter installation and maintenance requirements for SCME will be retained. However, relevant information and/or supporting documentation will be required in the SQMD Plan (which is submitted by the SC).

SCME will continue to be required to meet meter submission requirements from tariff section 10.3.2 and section 6 of the Metering BPM.

The ISO anticipates no metering interval changes from existing requirements/class exemptions stemming from this initiative.

One stakeholder expressed concern this proposal may cause many metering designs and specifications throughout the ISO grid and this may become a problem if the resource must switch SCs: The new SC may not be compatible with the resource's metering equipment. This stakeholder further argued this becomes a significant problem if the LSE becomes a default provider of SC services and could create an unfair cost burden to the LSE if it had to adapt to one-off meter configurations. In response, the ISO understands the concern and will evaluate the potential for a UDC to become the default SC with unique or incompatible metering configurations. That result seems very unlikely. As explained in section 4.5.4.6 of the ISO tariff, the ISO maintains a list of available SCs for each UDC territory. The UDC is only the SC of last resort. The ISO is unaware of any instance where the UDC's becoming the SC has been necessary. A market participant without an SC would have myriad other SCs to select from. If this scenario were to occur, the ISO would work with the new SC to determine a method to accomplish the gathering and processing of the meter data to meet the tariff requirements.

Another stakeholder raised concerns about the possibility of discrepancies and disputes related to SQMD submission at UDC-to-UDC intratie points. During the March 3 stakeholder web conference in this initiative, the ISO stated its view that adjacent UDCs have the responsibility to come to agreement on metering that is used for SQMD submission at UDC-to-UDC intratie points. As an alternative approach, this stakeholder recommended that the ISO proposal adopt language similar to what NERC uses for interchange metering, specifically NERC's BAL_005 R12, which this stakeholder explained requires tie-line metering to emanate from a common agreed-upon metering source. This stakeholder suggests that if similar tariff language existed that required adjacent UDCs to come to an agreement where common metering equipment was used, and each stakeholder was provided access to the common meter/data, then discrepancies and disputes likely would be minimized. In response, the ISO views these two approaches—putting the responsibility on the adjacent UDCs to come to agreement versus having a tariff provision requiring the adjacent UDCs to come to agreement—as potential options for addressing this scenario. The ISO suggests that a third option to address this stakeholder concern would be to not extend the second element of the ISO proposal to those UDCs wishing to obtain their own UFE calculation. To summarize, three possible options to address this stakeholder concern are:

1. Put the responsibility on the adjacent UDCs to come to agreement on metering used for SQMD submission at UDC-to-UDC intratie points;
2. Make it an explicit tariff requirement that adjacent UDCs must come to agreement on metering used for SQMD submission at UDC-to-UDC intratie points; or,
3. Require that UDCs that wish to obtain their own UFE calculations are ISOME. Under this third option the ISO would not allow SCs representing such UDCs to submit SQMD.

Rather than settling on any one of these options at this point, the ISO invites stakeholders to express a preference and explain why.

5.3 SQMD Plan

To provide market participants with greater flexibility, the ISO is proposing to allow SCs the option to submit SQMD for load, generation, and inertia/intratie resources. To maintain the integrity and quality of meter data used in market settlements, SCs that elect

to take advantage of this option will be required to develop and submit a SQMD Plan. These plans will provide SCs with the opportunity to demonstrate to the ISO that the meter data submitted to the ISO will be settlement quality. These SCs also could propose any unique metering configurations they plan to use according to their SQMD Plan.

The ISO will reserve the right to perform audits and inspections on the implementation and use of each SQMD Plan. Any SQMD Plan that proves to be inadequate is subject to revision to ensure it produces SQMD.

Besides the SQMD Plan, the entity will be required to submit an annual self-assessment where its management will attest to the implementation and adherence to its SQMD Plan. The entity also will be subject to the Rules of Conduct for late or inaccurate meter data.

The ISO has developed a draft SQMD Plan for stakeholder consideration as part of this revised straw proposal (see attached). The SQMD Plan also will include supporting template(s) outlining information to promote overall consistency and to ensure required information is obtained. The ISO plans to develop and implement defined deliverables and supporting timelines associated with the SQMD Plan.

The ISO is suggesting it have 20 business days to review a submitted SQMD Plan. This review would begin upon receipt of a complete SQMD Plan.

5.4 Modifications to ISOME requirements

The ISO proposes to modify the language in tariff section 10.2.6. Tariff section 10.2.6 describes that revenue quality meter data (RQMD) shall be provided to the CAISO's RMDAPS directly and that the CAISO may exempt an entity from this requirement if the installation of communication links is unnecessary, impracticable or uneconomic. The ISO proposes to revise the language to allow communication of meter data to the CAISO's RMDAPS via any available method provided appropriate security and/or encryption of the data exists and is verified to be in place for the method chosen.

Attachment A – Draft SQMD Plan

[Placeholder for Draft SQMD Plan]