

# Memorandum

**To:** ISO Board of Governors  
**From:** Karen Edson, Vice President, Policy and Client Services  
**Date:** December 10, 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 November 25, 2014, twenty-nine proposed revision requests (PRRs) were active in the BPM change management system and were all submitted by the ISO. These twenty-nine active PRRs affect the following BPMs:

- Credit Management (1 request)
- Definitions and Acronyms (1 request)
- Energy Imbalance Market (1 request)
- Market Instruments (2 requests)
- Market Operations (3 requests)
- Outage Management (1 request)
- Queue Management (2 requests)
- Reliability Requirements (5 requests)
- Settlements and Billing (13 requests)

## **PROCESS OVERVIEW**

The ISO held monthly BPM change management stakeholder meetings on October 28, 2014, where eighteen stakeholders participated, and on November 18, 2014, where fifteen stakeholders participated. Based on stakeholder comments during the meeting 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 November 25, 2014;
- Reflects that six PRRs were in final decision status for the period October 28, 2014 through November 25, 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.
- Seventeen PRRs were submitted into the electronic system by the ISO on an emergency basis.

Seventeen emergency PRRs were submitted in the recent weeks relating to:

- Settlements configuration guide updates
- FERC Order No. 789
- Flexible ramping capacity requirement updates
- Use-limited resource process updates
- Flexible resource adequacy capacity must offer obligation policy initiative

A PRR report summarizing the content of each active PRR in the BPM change management system as of November 25, 2014, is included as attachment 2.