

Memorandum

To: ISO Board of Governors

From: Karen Edson, Vice President, Policy and Client Services

Date: December 8, 2011

Re: Briefing on Business Practice Manuals Change Management Activities

This memorandum does not require Board action.

EXECUTIVE SUMMARY

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 23, 2011, 33 proposed revision requests (PRRs) were active in the BPM change management system, of which, 32 were submitted by the ISO, and 1 submitted by a stakeholder. These 33 active PRRs impact the following BPMs:

- 1 Direct Telemetry
- 1 Generator Interconnection Procedures
- 3 Market Instruments
- 1 Market Operations
- 2 Reliability Requirements
- 25 Settlements and Billing

No BPM decisions are under stakeholder appeal.

PROCESS OVERVIEW

The ISO held monthly BPM change management stakeholder meetings on October 25, 2011 and November 22, 2011. There were 10 stakeholders on each of the conference calls. Based on the nature of the meetings, and upon the types of comments entered into the BPM change management electronic system, it appears that stakeholders are generally satisfied with the process, as well as with the progress made on the active PRRs.

BPM CHANGE MANAGEMENT REPORT

The current *Board Update: BPM Change Management Process* report, which includes all the active PRRs as of November 23, 2011, is included as Attachment 1. In compliance with the tariff reporting requirements, the report:

- Summarizes the total number of active PRRs submitted by stakeholders and by the ISO;
- Depicts the number of active PRRs in various steps along the PRR lifecycle, as of November 23, 2011;
- Reflects those PRRs upon which Management has posted its final decision for the period September 30, 2011 through November 23, 2011; and
- Includes PRRs currently under stakeholder appeal, the stakeholder positions on rejected PRRs, and the reasons for rejection.

The following is additional relevant information:

- No PRRs are under stakeholder appeal.
- There were no PRRs submitted into the electronic system by the ISO on an emergency basis.

A PRR report summarizing the PRRs in the BPM change management system as of November 23, 2011, is included as Attachment 2.