

SQMD Plan Affirmation & SC Self Audit Attestation

Frequently Asked Questions

What is a SQMD Plan Affirmation vs. SC Self Audit Attestation?

- In accordance with CAISO Tariff 10.3.7.1, Scheduling Coordinators for Scheduling Coordinator Metered Entities that were not participating as such before April 10, 2017 or that repower, modify their Meter Data interval, or add generating capacity after April 10, 2017, must submit an SQMD -Plan to ensure that the Scheduling Coordinator will submit and maintain the integrity of Meter Data submitted to the CAISO for that Scheduling Coordinator Metered Entity. In addition, the Scheduling Coordinator must **annually** submit an SQMD Plan Affirmation stating that they affirm adherence to the SQMD Plan. If the Scheduling Coordinator finds that they cannot comply with the SQMD Plan, the Scheduling Coordinator will notify the ISO of any changes.
- In accordance with CAISO Tariff 10.3.10.1, each Scheduling Coordinator must **bi-annually** conduct audits/tests of the metering facilities of the SC metered entities that it represents and the meter data provided to the SCs to ensure compliance with relevant Local Regulatory Authorities. In addition, The Scheduling Coordinator will submit a SC Self Audit Attestation, signed by management, asserting audit completion and as evidence that the SC is meeting the Tariff requirement.

Why must I complete the SQMD Plan Affirmation or SC Self Audit Attestation?

- Per Tariff section 10.3.7.1, Scheduling Coordinators for SC Metered Entities must submit an SQMD Plan to ensure that the entity complies with the requirements outlined in the Business Practice Manual for Metering, section 6.1, Settlement Quality Meter Data (SQMD) Plan. Annually, the Scheduling Coordinator Metered Entity must conduct a self-assessment and affirm to the ISO that it has implemented and continues to comply with its SQMD Plan. Should the entity identify that it is not complying with its SQMD Plan, regardless if it is during its self-assessment or during its normal course of business, the entity must notify the ISO of the issue and make note of its plan for corrective action.
- Per Tariff section 10.3.10.1, each Scheduling Coordinator must bi-annually conduct audits/tests as outline by Section 6.4 Business Practice Manual for Metering. The SC Self Audit Attestation will apply to metering facilities associated to the SC metered entities that the SC represents and the meter data provided to the SCs to ensure compliance with relevant Local Regulatory Authorities. The signed management attestation signifies audit completion and is submitted to the CAISO as evidence that the SC is meeting the Tariff requirement.

Can the facility audit be done in-house or is a third party auditor required?

- For the SQMD Plan Affirmation, management has the discretion of who performs the assessment.
- For the SC Self Audit Attestation, either is acceptable, however, any person(s) conducting the audit must be independent of the meter data processing and must be familiar with auditing practices.

Does the CAISO provide a listing of possible third party auditors for the SC Self audit?

- The CAISO does not currently maintain a list of auditing firms. SCs should practice their own due diligence should they choose to select a firm.

Who must submit the SQMD Plan Affirmation and SC Self Audit Attestation?

- For the SQMD Plan Affirmation, Scheduling Coordinators for Scheduling Coordinator Metered Entities that were not participating as such before April 10, 2017 or that repower, modify their Meter Data interval, or add generating capacity after April 10, 2017, must submit an SQMD Plan Affirmation.
- Scheduling Coordinators who submit settlement quality meter data in accordance with the CAISO Settlements calendar are SCs who are representing SC metered entities and are therefore subject to the audit attestation.

What will be included in the SQMD Plan Affirmation and SC Self Audit Attestation?

- For the SQMD Plan Affirmation, the Scheduling Coordinator Metered Entity will perform a self-assessment and submit an affirmation, signed by management, that the entity implemented and continues to comply with its SQMD Plan. (Metering BPM 6.1.4) The SQMD Plan Affirmation must also include a unique identifier, such as the CAISO NRI Project number or a list of Resource ID's for each Scheduling Coordinator Metered Entity.
- For the SC Self Audit Attestation, the Scheduling Coordinator will submit an attestation, signed by management, attesting they have completed the appropriate audits and tests and that management has reviewed the results. They must also attest, that based on their review, they are in compliance with tariff requirement 10.3.10.1 and that they have taken all reasonable and necessary actions to ensure the accuracy and integrity of the SQMD provided to the ISO. Should the auditor identify audit findings, a list of those findings and associated corrective actions should be included. You must also state the Auditor's name and identify the audit period that was reviewed and sampled. (Metering BPM 6.4.2)

Please note: It is no longer a requirement to submit an audit report to the ISO, however, per Tariff section 10.3.10.2, the ISO retains the right to audit a facility and may request the audit report as part of its review.

What if I was submitting data to the CAISO for a short window of time?

- For the SQMD Plan Affirmation, if you have an approved SQMD Plan and have implemented the plan for at least 1 Trading Day, you will need to submit an SQMD Plan Affirmation. If you have an approved SQMD Plan, but have not implemented it, you are not required to submit a SQMD Plan Affirmation. (Metering BPM 6.1.4)
- The lookback period must fall within the 2 years between when the last SC Self Audit Attestation was submitted to the CAISO, to when the present SC Self Audit Attestation is due. If you are no longer submitting SQMD at the time the SC Self Audit Attestation is due, no attestation is required. (Metering BPM 6.1.4)

What is my minimum requirement for the SQMD Plan Affirmation and SC Self Audit Attestation?

- The SQMD Plan Affirmation is required if a plan has been implemented for at least 1 trade date prior to July 31st
- For the SC Self Audit Attestation, if you do not have an established self audit schedule, then it is required to perform your audit and sampling from a 1 year lookback.

Is there a specific format I must follow when submitting the SQMD Plan Affirmation or SC Self Audit Attestation?

- For both submittals, the CAISO will contact you via email and DocuSign. A template and specific instructions will be provided. For further questions, you may send your questions to EDAS@caiso.com.

When is the SQMD Plan Affirmation and SC Self Audit Attestation due to the CAISO?

- The SQMD Plan Affirmation and SC Self Audit Attestation will be due annually on October 31st. Where October 31st falls on a weekend, they will be due the first business day in November. (Metering BPM 6.1.4, 6.4.2)

Who in my organization can sign off on the SQMD Plan Affirmation or SC Self Audit Attestation?

- A managing officer of the organization is required to sign off on the forms.