

Memorandum

To: ISO Board of Governors
From: Karen Edson, Vice President, Policy and Client Services
Date: December 10, 2015
Re: **Business practice manual change management report**

This memorandum does not require Board action.

This memorandum provides a regular report, as 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, 2015, thirteen proposed revision requests (PRRs) were active in the BPM change management system, and all were submitted by the ISO. These thirteen active PRRs affect the following BPMs:

- Credit Management and Market Clearing (1 request)
- Energy Imbalance Market (1 request)
- Generator Management (2 requests)
- Generator Interconnection Procedures (1 request)
- Generator Interconnection and Deliverability Allocation Procedures (3 requests)
- Market Instruments (2 requests)
- Market Operations (1 request)
- Reliability Requirements (2 requests)

PROCESS OVERVIEW

The ISO held monthly BPM change management stakeholder meetings on October 27, 2015, where nineteen stakeholders participated, and on November 17, 2015, where thirty-two stakeholders participated. Based on stakeholder comments during the meetings 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, 2015;
- Reflects that seven PRRs were in final decision status within the period October 13, 2015 through November 25, 2015; 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.
- There were no rejected PRRs.
- Four of the active PRRs were submitted into the electronic system by the ISO on an emergency basis.

The four emergency PRRs required rapid implementation, as the effective dates occurred prior to the completion of the BPM change management stakeholder process.

A PRR report summarizing the content of each active PRR in the BPM change management system as of November 25, 2015, is included as attachment 2.