

# Memorandum

**To:** ISO Board of Governors  
**From:** Tom Doughty, Vice President, Customer and State Affairs  
**Date:** September 12, 2017  
**Re:** **Business practice manual change management report**

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***This memorandum does not require Board action.***

Management, as required by the Federal Energy Regulatory Commission, provides this report 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 August 24, 2017, eleven proposed revision requests (PRRs) were active in the BPM change management system. Four were submitted by Large-Scale Solar Association. All others were submitted by the ISO. These eleven active PRRs affect the following BPMs:

- Congestion Revenue Rights (1 request)
- Candidate CRR Holder Registration (1 request)
- Energy Imbalance Market (1 request)
- Generator Interconnection Deliverability and Allocation Procedures (2 requests)
- Generator Management (2 requests)
- Market Instruments (1 request)
- Market Operations (1 request)
- Scheduling Coordinator Certification and Termination (1 request)
- Transmission Planning Process (1 request)

## PROCESS OVERVIEW

The ISO held two monthly BPM change management stakeholder meetings since the submittal of the previous board report. There was a meeting on July 25, 2017, in which twenty-nine stakeholders participated and a meeting on August 22, 2017, in which thirty-one

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 August 24, 2017;
- Reflects that five PRRs were in final decision status within the period July 1, 2017 through August 24, 2017; 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 currently under stakeholder appeal.
- There was one rejected PRR submitted by Large-Scale Solar Association. The reason for rejection is included in the Final Decision Report.
- There were two active PRR submitted into the electronic system by the ISO on an emergency basis.

A PRR report summarizing the content of each active PRR in the BPM change management system as of August 24, 2017 is included as attachment 2.