BPM Change Management Meeting

Hannah Pearson
BPM Change Management Facilitator
BPM_CM@caiso.com

December 16, 2025

The information contained in these materials is provided for general information only and does not constitute legal or regulatory advice. The ultimate responsibility for complying with the ISO FERC Tariff and other applicable laws, rules or regulations lies with you. In no event shall the ISO or its employees be liable to you or anyone else for any decision made or action taken in reliance on the information in these materials.

Housekeeping reminders

- This call is being recorded for informational and convenience purposes only. Any related transcriptions should not be reprinted without ISO's permission.
- Meeting is structured to stimulate honest dialogue and engage different perspectives.
- Please keep comments professional and respectful.

Instructions for raising your hand to ask a question

- If you are connected to audio through your computer or used the “call me” option, please use the raised hand icon located on the lower center of the Webex screen to enter the question queue.
- If you are not logged into Webex and just dialed in on the phone - dial *3 to enter the queue.
- Please remember to state your name and affiliation before making your comment.
- If you need technical assistance during the meeting, please send a chat to the event producer.

Agenda – BPM Change Management Meeting
December 16, 2025

Topic	Presenter
Introduction	Hannah Pearson
Meeting Overview and Updates	Hannah Pearson
Candidate CRR Holder Registration	Rashele Wiltzius
Generator Interconnection and Deliverability Allocation Procedures	Matthew Chambers Daune Wilson
Generator Management	Jill Jordan
Market Operations	Michael Martin Priyanka Namburi
Congestion Revenue Rights	Chandinee Chandrasekaran
Transmission Planning Process	Andrew Rivera
Outage Management	Dinesh Das Gupta
Scheduling Coordinator Certification and Termination	Nicole Hines
Wrap-Up and Next Steps	Hannah Pearson

BPM Change Management Process
BPM_CM@caiso.com

California ISO Stakeholder Initiative Process

- Business Practice Manuals
  - The purpose of BPMs is to set forth business practices that implement the ISO tariff.
  - The ISO conducts a yearly policy initiative roadmap process to consider and rank initiatives.
    - *Policy changes submitted though the PRR process will be referred to the policy initiative road map process.*
  - Each subject area in a BPM is based on enabling language in the ISO tariff.
    - *The PRR process cannot be used to introduce changes that are not supported by existing tariff authority.*

Candidate CRR Holder Registration

PRR	PRR Title	Stage
1651	Update Training CBT List for CRR Certification	Recommendation

PRR 1651 – Update Training CBT List for CRR Certification

- Reason for revision:
  - Updated section 2.3.4 to remove outdated CRR CBTs and refer out to the CRR Holder Training Roles Matrix and Congestion Revenue Rights Holder Certification Computer-Based Training Course Map for list of training CBTs
  - Change effective at launch of CRR application replacement on 6/4/2025
- Recommendation comments:
  - Bonnie Blair (Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, CA) December 9, 2025 @ 13:24
- Recommendation comment period expired: December 9, 2025
- Next step: Final Decision

Generator Interconnection and Deliverability Allocation Procedures

PRR	PRR Title	Stage
1642	Intra-cluster prioritization deliverability clarification	Recommendation
1644	Stand-Alone Network Upgrade Clarification	On Hold
1647	Clarification of project financial-security posting requirements	On Hold

PRR 1642 – Intra-cluster prioritization deliverability clarification

- Reason for revision
  - Submitted by Susan R. Schneider, Phoenix Consulting
  - Clarify that projects receiving ICP “headroom” allocations, and accelerating their CODs accordingly, can provide Resource Adequacy under specific circumstances even though all of their Assigned Network Upgrades are not yet complete.
  - CAISO rules usually require that all Precursor and Assigned Network Upgrades be complete before a project with a TPD Allocation receives its applicable FCDS or PCDS designation. However, projects accelerating their CODs pursuant to an ICP “headroom” allocation are allowed to interconnect and operate before the ICP-related RNU is in-service.
  - This PRR is needed to clarify that such projects can receive FCDS or PCDS, as applicable, once the non-ICP upgrades are in service. It would undermine the effectiveness of the ICP process if these projects had to wait to fully provide RA until the ICP-related RNU is in service.
  - Effective at end of PRR process.
- Recommendation comments: None
- Recommendation comment period expired: December 9, 2025
- Next step: Final Decision

PRR 1644 – Stand-Alone Network Upgrade Clarification

- Reason for revision
  - Submitted by Susan R. Schneider, Phoenix Consulting
  - Clarify the risks that Interconnection Customers assume if they elect to self-build Stand-Alone Network Upgrades
  - Effective at end of PRR process.
  - The cost and timing risks assumed by an Interconnection Customer electing to self-build a Stand Alone Network Upgrade – e.g., non-recovery of cost overruns and/or COD extension risks for timing delays – are not clear in the existing language. This PRR would help ensure that Interconnection Customers are fully aware of these risks and can consider them in making the self-build election.
- On Hold
- Comment period expired: November 17, 2025
- Next step: Recommendation Comment
  - Once the PRR has been removed from On Hold status

PRR 1647 – Clarification of project financial-security posting requirements

- Reason for revision
  - Submitted by Susan R. Schneider, Phoenix Consulting
  - Clarify that Interconnection Customer financial-security posting requirements should exclude coverage for the cost of Network Upgrades approved in the Transmission Planning Process.
  - Effective at end of PRR process.
  - Projects are not responsible for paying for Assigned Network Upgrades that are later approved in the annual Transmission Planning Process. Generator Interconnection Agreements are usually amended to remove payment and security requirement for such upgrades, and it is understandable that those amendments can require a reasonable timeframe. This PRR is needed to ensure that any increased financial-security requirements (e.g., for a new second or third posting) occurring between TPP approval of the upgrade and the subsequent GIA amendments should not include the cost of the TPP-approved Network Upgrade
- On Hold
- Comment period expired: November 17, 2025
- Next step: Recommendation Comment
  - Once the PRR has been removed from On Hold status

Generator Management

PRR	PRR Title	Stage
1643	Limited Operation Study Deliverability Clarification	Recommendation

PRR 1643 – Limited Operation Study Deliverability Clarification

- Reason for revision
  - Submitted by Susan R. Schneider, Phoenix Consulting
  - Clarify that projects receiving permission to operate before all upgrades are complete, pursuant to a Limited Operation Study, can provide Resource Adequacy under specific circumstances even though all of their Assigned Network Upgrades are not yet complete.
  - Effective at end of PRR process.
  - CAISO rules usually require that all Precursor and Assigned Network Upgrades be complete before a project with a TPD Allocation receives its applicable FCDS or PCDS designation. However, projects can interconnect and operate before completion of all their reliability-related upgrades pursuant to a Limited Operation Study.
  - This PRR is needed to clarify that such projects can receive FCDS or PCDS, as applicable, once their deliverability-related upgrades are in service, even if reliability-related upgrades are not yet complete. If the project can operate without the incomplete upgrades, they should be able to provide full RA services.
- Recommendation comments: None
- Recommendation comment period expired: December 9, 2025
- Next step: Final Decision

Market Operations

PRR	PRR Title	Stage
1652	Real-time bid cost recovery calculations for limited energy storage resources	Recommendation
1653	Real Time market High and low unit operating limit usage for Regulation	Initial

PRR 1652 – Real-time bid cost recovery calculations for limited energy storage resources

- Reason for revision
  - Added a section to the Market Operations Appendix D that outlines the design of Real-time bid cost recovery calculations for limited energy storage resources including detailed equations.
- Recommendation comments: None
- Recommendation comment period expired: November 17, 2025
- Next step: Final Decision

PRR 1653 – Real Time market High and low unit operating limit usage for Regulation

- Reason for revision
  - The Real-Time Market will consider the Unit Operating High Limit and Unit Operating Low Limit as described in Section 8.4.2 of the BPM for Direct Telemetry when awarding Regulation Up and Regulation Down in all intervals of each market run. This is a change from using the telemetry value in first hour and the MasterFile in the second hour of the RTPD horizon.
- Initial comments:
  - Alan Meck (PG&E) December 9, 2025 @ 16:26
- Initial comment period expired: December 9, 2025
- Next step: Recommendation Comment

Congestion Revenue Rights

PRR	PRR Title	Stage
1654	Changes related to additional collateral requirement	Recommendation

PRR 1654 – Changes related to additional collateral requirement

- Reason for revision
  - As part of implementing the CRR Replacement Project earlier this year, the ISO changed an element of the credit requirements for participating in the CRR process. The specific change relates to the credit required of participants submitting offers to sell CRRs in the annual auction that initially were secured from the allocation process. In the event of load migration, the ISO would issue counterflow CRRs to the party that initially procured the CRRs in the allocation. The ISO increased the credit required from the party submitting these sell offers to address the risk of that party defaulting during the period the load migration counterflow CRRs are in effect. The specific details of this requirement were proposed in PRR 1619 and are reflected in Attachment H, section 1.1B of the CRR BPM.
  - The ISO has received multiple inquiries from CRR participants reporting unexpectedly high credit requirements to participate in the 2026 annual CRR auction. The ISO determined these high credit requirements are driven by the recent updates to Attachment H of the BPM. Although the ISO remains concerned about the risk of default from parties receiving load migration counterflow CRRs, the new BPM rules are resulting in credit posting requirements that would materially impact participation in the annual CRR auction in ways that neither the ISO nor market participants anticipated. The ISO has decided to submit an emergency PRR to remove the new requirements described in Attachment H of the CRR BPM effective immediately.
  - Rollback effective as of 11/18/2025
- Recommendation comments: None
- Recommendation comment period expired: December 9, 2025
- Next step: Final Decision

Transmission Planning Process

PRR	PRR Title	Stage
1655	Subscriber PTO updates from Tariff Section 24	Initial

PRR 1655 – Subscriber PTO updates from Tariff Section 24

- Reason for revision
  - Updates to BPM in order to reflect changes made in CAISO Tariff Section 24 related to Subscriber PTO. Minor updates to remove out of date proposed schedule in 6.4.1, as well as updated BPM format.
- Initial comments: None
- Initial comment period expired: December 9, 2025
- Next step: Recommendation comment

Outage Management

PRR	PRR Title	Stage
1656	Clarifying Nature of Work for generation outages related to distribution utility limitations	Initial

PRR 1656 – Clarifying Nature of Work for generation outages related to distribution utility limitations

- Reason for revision
  - Clarify that distribution-level market-participating resources with generation outages due to limitations set by the distribution utility unrelated to transmission or distribution equipment outage should use the “ambient due to fuel insufficiency" nature of work.
- Initial comments:
  - Colin Orloff (Wellhead Power eXchange) December 9, 2025 @ 17:03
  - Sara Fitzsimon (Independent Energy Producers Association) December 9, 2025 @ 16:44
  - Alan Meck (PG&E) December 9, 2025 @ 16:28
  - Don Tretheway (GDS Associates representing CESA) December 9, 2025 @ 14:38
  - Bonnie Blair (Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, CA) December 9, 2025 @ 12:53
- Initial comment period expired: December 9, 2025
- Next step: Recommendation comment

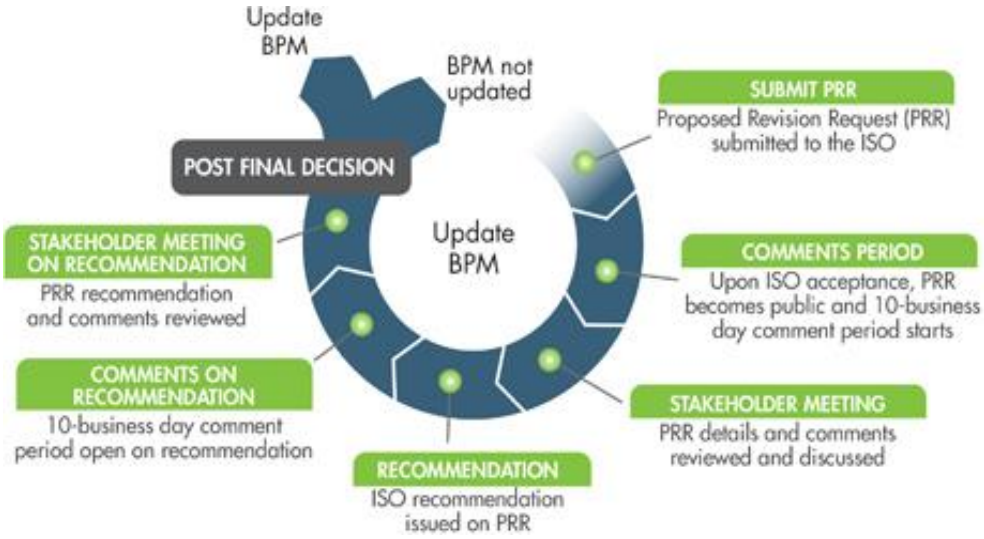
Scheduling Coordinator Certification and Termination

PRR	PRR Title	Stage
1657	Clarifying real-time test requirement and adding section for contact list requirements	Initial

PRR 1657 – Clarifying real-time test requirement and adding section for contact list requirements

- Reason for revision
  - The reason for this revision is to add clarity to the existing real time desk testing process and to define new process for annual confirmation of contact information.
  - Effective date 2/1/2026
- Initial comments:
  - Bonnie Blair (Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, CA) December 9, 2025 @ 13:11
  - CAISO Response: We added this to the reason for revision as it was missed when PRR was being submitted. The definition was updated in the BPM and not meant to change any obligations for scheduling coordinators, but an administrative one to keep the definition the same as Appendix A of the CAISO Tariff.
    The second update for that paragraph was due to all scheduling coordinators are required to sign an SCA and MSA, not just an SCA.
- Initial comment period expired: December 9, 2025
- Next step: Recommendation comment

Next BPM PRR Review Monthly Meeting: January 27, 2025 @ 11:00 a.m. PT



BPM change management process questions:
Joseph Williamson-Duffney
BPM_CM@caiso.com