



California ISO

BPM Change Management Meeting

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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.
- Note that PRRs 1642 & 1643 were inadvertently listed on this month's notice and have already completed the full review cycle.
- BPM Meetings in March/April may be longer or span multiple days to allow for review of changes related to Extended Day-Ahead Market and Day-Ahead Market Enhancements implementation. Any change to the standard meeting schedule will be communicated via ISO notice.
- Upcoming training: Wednesday, January 28, 10am-11am

Join us tomorrow!

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

January 27, 2026

Topic	Presenter
Introduction	Radha Madrigal
Meeting Overview and Updates	Radha Madrigal
Congestion Revenue Rights	Chandinee Chandrasekaran
Generator Interconnection and Deliverability Allocation Procedures	Daune Wilson Matthew Chambers
Market Operations	Michael Martin
Outage Management	Dinesh Das Gupta
Scheduling Coordinator Certification and Termination	Nicole Hines
Transmission Planning Process	Andrew Rivera
Wrap-Up and Next Steps	Radha Madrigal

BPM Change Management Process
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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 through 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.*

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: January 8, 2026
- Next step: Final Decision

Generator Interconnection and Deliverability Allocation Procedures

PRR	PRR Title	Stage
1644	Stand-Alone Network Upgrade Clarification	Recommendation
1647	Clarification of project financial-security posting requirements	Recommendation

PRR 1644 – Stand-Alone Network Upgrade Clarification

- Reason for revision
 - Submitted by Susan R. Schneider, Phoenix Consulting on behalf of LSA
 - 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.
- Recommendation comments received from:
 - Bonnie Blair (Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, CA)
- Recommendation comment period expires: February 18, 2026
 - Note: this PRR is going through an additional review cycle as the modified PRR was not visible in the tool prior to the close of the January comments window
- Next step: Final Decision

PRR 1647 – Clarification of project financial-security posting requirements

- Reason for revision
 - Submitted by Susan R. Schneider, Phoenix Consulting on behalf of LSA
 - 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
- Recommendation comments received from:
 - Bonnie Blair (Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, CA)
- Recommendation comment period expires: February 18, 2026
 - Note: this PRR is going through an additional review cycle as the modified PRR was not visible in the tool prior to the close of the January comments window
- Next step: Final Decision

Market Operations

PRR	PRR Title	Stage
1653	Real Time market High and low unit operating limit usage for Regulation	Recommendation

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 Master File in the second hour of the RTPD horizon.
- Recommendation comments: None
- Recommendation comment period expired: January 8, 2026
- Next step: Final Decision

Outage Management

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

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.
 - (Added 12/23/25): This PRR was driven by questions on distribution-level charging constraints. The PRR is relevant to all storage resources with limitations to charging abilities that are unrelated to transmission or distribution equipment outages.
- Recommendation comments received from the following organizations:
 - California Energy Storage Alliance (CESA), Strata Clean Energy, Terra-Gen, Fullmark Energy, Wellhead Power eXchange, ENGIE North America
- Recommendation comment period expired: January 8, 2026
- Next step: Final Decision

Scheduling Coordinator Certification and Termination

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

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
- Recommendation comments: None
- Recommendation comment period expired: January 8, 2026
- Next step: Final Decision

Transmission Planning Process

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

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.
- Recommendation comments: None
- Recommendation comment period expired: January 8, 2026
- Next step: Final Decision

Next BPM Change Management Meeting: Feb. 24, 2026, 11:00 AM PT

BPM change management process

The ISO systematic and publicly transparent BPM Change Management process ensures the consideration of all relevant information when modifying BPMs. The change management process uses a system available through the ISO public website that provides a way to propose BPM changes, comment on open change requests, and track proposed change requests. The change management process begins when the ISO or a stakeholder submits a web-based Proposed Revision Request (PRR). After an ISO review for completeness, PRRs are posted to the website, triggering a stakeholder review and comment period.

1. Submit Proposed Revision Request (PRR)

2. Comments period

Upon ISO acceptance, PRR becomes public and 10-business day comment period starts

3. Stakeholder meeting

PRR details and comments reviewed and discussed

4. Recommendation

ISO recommendation issued on PRR

5. Comments on recommendation

10-business day comment period open on recommendation

6. Stakeholder meeting on recommendation

PRR recommendation and comments reviewed

7. Final decision*

BPM updated or not updated

* Stakeholders have the right to appeal the final decision of a proposed revision request (PRR)

Direct BPM change management process questions to:
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