

Memorandum

To: ISO Board of Governors
From: Tom Doughty, Vice President, Customer and State Affairs
Date: November 7, 2018
Re: **Business practice manual change management report**

This memorandum does not require Board action.

As required by the Federal Energy Regulatory Commission, Management 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 October 23, 2018, twenty-one proposed revision requests (PRRs) were active in the BPM change management system. All PRRs were submitted by the ISO. These twenty-one active PRRs affect the following BPMs:

- Congestion Revenue Rights (1 request)
- Energy Imbalance Market (5 requests)
- Generator Interconnection Deliverability Allocation Procedures (1 request)
- Managing Full Network Model (1 request)
- Market Operations (2 request)
- Outage Management (1 request)
- Reliability Requirements (2 requests)
- Settlements and Billing (8 requests)

PROCESS OVERVIEW

The ISO held three monthly BPM change management stakeholder meetings since the submittal of the previous Board report. There was a stakeholder meeting on August 28, 2018, in which twenty-four stakeholders participated, a meeting on September 25, 2018, in which

twenty-six stakeholders participated, and a meeting on October 23, 2018, in which forty-eight stakeholders participated. Based on stakeholder comments during these meetings, and 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 October 23, 2018;
- Reflects that seven PRRs were in final decision status within the period August 21, 2018 through October 23, 2018; 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 is one PRR currently under stakeholder appeal. We are working to resolve the stakeholder issue that is outside the scope of the proposed revision request BPM language change.
- There were no rejected PRRs.
- There were four active PRRs 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 October 23, 2018 is included as attachment 2.