

# Customer Comments

## BPM Change Management Tariff Language

Monday, May 21, 2007

Submitter	Topic	Comment	CAISO Response
WPTF	WPTF offers an alternative appeal process	Uses an appeal committee made up of CAISO employees and market participant representatives by industry segment structured.	
Williams	<p>Tariff Section (22.11.1) entitled "Process for Revisions of Business Practice Manuals", that section, in six places, still defers to the BPM for BPM Change Management details of the process:</p> <ol style="list-style-type: none"> <li>1. BPM PRR Request ("PRR") (<i>Section 22.11</i>);</li> <li>2. PRR process (<i>Section 22.11.1</i>);</li> <li>3. PRR consideration (<i>Sections 22.11.1, 22.11.1.3, 22.11.1.5</i>);</li> <li>4. PRR impact analysis (<i>Section 22.11.1.4</i>);</li> <li>5. Stakeholders comments on posted BPM PRRs (<i>Section 22.11.1.5</i>);</li> <li>6. CAISO published recommendation for a BPM change and stakeholders comment on that recommendation (<i>Section 22.11.1.5</i>).</li> </ol>	These elements of BPM change management process must be detailed in the tariff – and not merely relegated to a BPM – so as to comply with FERC's directive in paragraph 1371 of the September 21, 2006 MRTU Order.	
Williams	Concerns regarding critical details are still missing from the Tariff.	Form of or information necessary in the PRR is not specified in the proposed tariff language, which may undermine due process given that Section 22.11.1.2 allows the CAISO to withhold consideration of a PRR until the PRR is complete.	
Williams	Concerns regarding critical details are still missing from the Tariff.	Language does not set forth how PRR recommendations are approved, rejected or modified. Such authority appears to lie solely in the discretion of the BPM Change Management Coordinator (Section	

		22.11.1.5), but that authority is not expressly described in Section 22.11.1.3.	
Williams	Concerns regarding critical details are still missing from the Tariff.	Section 22.11.1.5 both describes “regularly established” public meetings to consider PRRs and also allows for “specially noticed” meetings – in neither case indicating when such meetings would be held and how they would be noticed.	
Williams	Appeal handled by a committee of at least three “CAISO executives”.	Who “CAISO executives” are remains undefined, this reasonably leaves open the possibility that an appeal of a proposed BPM modification concerning market details could be heard by three CAISO executives whose expertise does not extend to the details of the markets – for example, the CFO, Vice President of External Affairs and CIO.	
Williams	Appeals process	Williams would support an appeals process overseen by a committee comprised of CAISO employees and representatives from segments of the industry. This committee could be structured so that the CAISO membership (assumed to be voting in a bloc) plus some reasonable segment of the industry would constitute a majority.	
SCE	Overall	Much improved over the pre-Board meeting draft.	
SCE	22.11.1.1 BPM Proposed Revision Request	ADD Local Regulatory Authority	
SCE	22.11.1.1 BPM Proposed Revision Request.	Change last paragraph	
SCE	22.11.1.2 BPM Proposed Revision Request Processing.	Light Edited language	
SCE	22.11.1.3 BPM PRR Coordinator.	Light Edited language	
SCE	22.11.1.4 Types and Treatment of BPM PRRs.	Light Edited language. Categorize the types	
SCE	22.11.1.5 BPM PRR Review	Light Edited language	

	and Action.		
SCE	22.11.1.6 Right to Appeal to CAISO.	Light Edited language	
SWP	§22.11 Operating Procedures and Business Practice Manuals Development and Amendment Process	Change to “The CAISO shall establish a stakeholder process as set forth in Section 22.11.1 and in a Business Practice Manual for BPM change management in order to ensure that all affected parties have an opportunity to comment on proposed <u>changes to any Operating Procedures and Business Practice Manual</u> ”. Such a change will be consistent with the first sentence of this section, “The CAISO shall prepare, maintain, promulgate and update the Operating Procedures and Business Practice Manuals”.	
SWP	§22.11.1 Process for Revisions of Business Practice Manuals	Ambiguity in paragraph. It indicates a PRR should have PRR impact analysis submitted by CAISO management.  BPM PRR should not require an impact analysis by a market participant. The impact analysis should be done by CAISO after the submittal of a BPM or Operating Procedure PRR by a market participant or an affected entity.	
CPUC	Segments	Still feels strongly that voting segments should exist with extensive use of working groups as necessary.	
CPUC	Voting segments and appeals	The appeals process at best is suspect, at worst is nonexistent or engaged by the same people rejecting other views to be repeated at executive level.  Moreover, there is no clear way to understand who at the executive level is reviewing this and what duties are common upon them to perform or do anything in a meaningful	

		fashion.	
CPUC	Voting segments and appeals	Pervasiveness that allows the California ISO to be a unilateral decider without meaningful checks and balances.	