

**Comments of Shell Energy North America (US), L.P. on
CAISO Straw Proposal – Data Release & Accessibility
Phase 2 Convergence Bidding Data Release
December 31, 2009**

Submitted by	Company	Date Submitted
<i>Mike Evans (858) 526-2103</i>	<i>Shell Energy North America (US), L.P.</i>	<i>January 11, 2010</i>

The CAISO has requested feedback on its straw proposal for data release for convergence bidding data per its December 31, 2009 draft. Shell Energy North America (US), L.P. (“Shell Energy”) provides the following comments:

1. 90-Day Timeline for Release of Data - Shell Energy supports the release of virtual bid data concurrent with physical bid data on a 90-day timeline. Shell Energy cautions the CAISO that release of net cleared virtual quantities by node at the close of the day-ahead market will likely reveal sensitive variable cost information regarding generation units which are connected at a node corresponding to the generation power plant, and whose data would then be released immediately to the market should the ISO choose this data release option. In addition, we anticipate that the CAISO faces a significant hurdle at FERC to obtain approval of a day-ahead timeframe, given that the other eastern RTO’s have 90 to 180-day time lags for release of virtual bid data. Efficiency of virtual bidding will be readily apparent in publicly available day-ahead and real time pricing.
2. Daily Market Summary Report – Due to apparent interest by stakeholders in obtaining some information relative to virtual bids on a DA basis, Shell Energy would support a Daily Day-Ahead Pricing Report showing Energy Cleared in MWh, aggregated by LAP, similar to the Table 3 example in the straw proposal. Intertie virtual bids should not be separately reported.