

**Shell Energy North America (US), L.P. Comments to:
CAISO “Revised Settlement Statements and Dispute Timeline for
T+35M” Straw Proposal**

Submitted by	Company	Date Submitted
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Shell Energy appreciates the opportunity to provide comments on the “Revised Settlement Statements and Dispute Timeline for T+35M” Straw Proposal dated December 7, 2015.

Shell Energy supports the ISO straw proposal to revise the T+35M recalculation settlement statement to a T+33M (T+693B) recalculation settlement statement, and to change the dispute timeline from 5 business days to 22 business days to provide adequate time for market participants to review the T+33M recalculation settlement statement. This will also align the dispute timeline with the T+55B, T+9M and T+18M resettlement statement invoices, which we view as a positive step and which will be helpful to the staff responsible for reviewing and disputing these invoices.

We do not see a negative impact to the potential to provide less time to resolve disputes, such as GFNs, and believe that this actually an improvement, as it provides more time to accurately determine the basis of possible disputes to the T+33M settlement statement.

Shell Energy supports the ISO straw proposal to revise T+35M to T+33M and to provide for a revised dispute window of 22 business days for the T+33M resettlement invoice.