

**Shell Energy North America (US), L.P. Comments to:
2017 CAISO Stakeholder Catalog**

Submitted by	Company	Date Submitted
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Shell Energy appreciates the opportunity to provide comments to the Draft 2017 Stakeholder Initiatives Catalog. Please see comments below.

Initiative Name	Grid Reliability	Improving Overall Market Efficiency	Desired by Stakeholders	Market Participant Implementation (\$ and resources)	ISO Implementation (\$ and resources)
EIM External Resource Participation	7	7	7	7	7

Shell Energy encourages the ISO to allow non-EIM market participants to bid into the ISO from external resources. We think that this would have a low implementation cost for the ISO as much of the metering infrastructure with other BAs exist, and the network model exists for these BAs. We believe with the rapid development of renewable resources in the CAISO BA, the ISO needs access to these resources for balancing renewables, and a 7 not a 3 is warranted for Grid Reliability. Further, we believe that this is a feature that is highly desired by both stakeholders and FERC, and may resolve perceptions of discriminatory treatment of some market participants, and thus warrants a 7.

Export Charges	7	7	7	10	7
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We support ISO efforts to remove export charges and remove the discriminatory treatment between EIM entities and non-EIM entities. In addition, we believe that this will be very important for market efficiency and grid reliability, thus warranting scores of 7. The value to market participants is high, thus reflected as a 10. Given this is visible to FERC and a potentially discriminatory policy, we encourage the ISO to rank this effort high.

Risk-of- Retirement Process Enhancements	7	7	7	10	3
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With Sutter, La Paloma, Moss Landing and Calpeak indicating revenue deficiencies, it is reasonable that there is a significant problem with fixed cost recovery in the RA and energy markets. We believe that the continued existence of generation not supported by RMR contracts is vital to a well-functioning market and encourage the ISO to rank this effort high.

CRR Auction Efficiency	0	0	3	7	7
<p>We do not believe this initiative has significant interest and warrants a lower priority. The CRR market is complex, and we encourage the ISO to work with the MSC to evaluate drivers for the perception that the CRR market is not working before initiating a stakeholder process. There are other more pressing market issues, such as overall integration of renewables that are critical.</p>					