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Sent: Monday, November 24, 2008 10:12 AM
To: Berberich, Steve; Delaney, Tom
Cc: robert.reilley@shell.com; beth.bowman@shell.com; Fuller, Don; Snay, Charles; McGuffin, Mike
Subject: Shell Comments for Public Comment at ISO Board re: MRTU, Nov. 24, 2008

Dear Steve and Tom,

We note that the ISO has posted its three staff recommendations to the ISO Board on Friday, and that the CEO letter indicates that a Feb. 1 go-live is unworkable. We agree that testing has not proceeded sufficiently to support a Feb. 1 go-live. We continue to encourage the ISO to go live after the remaining software drops have been implemented, after the ISO meets the exit criteria and then after market participants have completed their 90 days of implementation, testing and training. We point out the importance of ensuring that the software works, to maintain confidence in western energy markets. If we cannot get the software to work, the current anomalies turn into settlement disputes, and the time and cost required for the ISO and market participants to resolve those many disputes could be staggering.

Shell Energy remains committed to working with the ISO throughout market sim testing. We are extremely concerned that market simulation testing has not progressed as anticipated. There have been critical issues with system connectivity, data traceability, quality of solution and settlements that need to be addressed. We hope that you are able to provide market participants the promised 90 days of testing after the software freeze and before go-live. We would appreciate you including this e-mail in the public comment portion of today's Board meeting.

Sincerely,

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