

Comments to Market Settlement Timeline Issue Paper and Straw Proposal

Shell Energy North America (US), L.P.

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Shell Energy North America (US), L.P. (Shell Energy) supports the ISO proposal to revise the market settlement timeline as described in the ISO Market Settlement timeline Issue Paper and Straw Proposal of June 11, 2019 and on the stakeholder conference on call on June 13, 2019.

The ISO proposes to replace the existing T+3B, T+12B, T+55B, T+9M, T+18M, T+33M and T+36M settlement publication dates with the following new dates: T+7B, T+60B, T+12M, T+21M and T+24M.

We support the changes but suggest that the ISO could still publish an advisory T+3B preliminary statement. Currently, this statement is not disputable, and already exists, so the workload may be minimal to maintain this publication. The T+3B is very helpful for risk management and provides an important preliminary view of financial exposures. It would be helpful for our organization, and presumably others, to keep this advisory settlement in place.

Thank you for your consideration.

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