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**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

In the Matter of:

The 2026 Integrated Energy Policy
Report Update (2025 IEPR)

Docket No. 25-IEPR-02

**Certification of Shell Energy North America (US), L.P.
in Support of Application for Confidential Treatment
of Portions of its Electricity Resource Plan**

Pursuant to Section 25322 of the Public Resources Code (“PRC”) and Section 2505(a)(4) of Title 20 of the California Code of Regulations (“CCR”), Shell Energy North America (US) L.P. (“Shell Energy” or “Applicant”) provides this Certification in support of its Application requesting that the Commission designate as confidential certain information contained in the attached IEPR Supply Forms being submitted today, November 14, 2025. The information for which Shell Energy seeks confidential treatment is substantially the same as the information for which the Commission granted Shell Energy confidential treatment in Docket Nos. 19-IEPR-02 (June 5, 2019), 22-IEPR-03 (December 2, 2022), 24-IEPR-02 (December 4, 2024) and 25-IEPR-03 (August 8, 2025).

The information for which Applicant seeks confidential treatment is as follows:

A. Form S-1:

Applicant’s Form S-1 contains the following confidential information, including confidential information on a disaggregated basis for each electric utility’s distribution area:

1. Applicant’s actual historical peak load calculations, energy demand calculations, and historic peak load (MW) for each year 2023-2024 (Columns G-H, Lines 1-11, 12-18, and 19-25).
2. Applicant’s forecast peak load calculations and energy demand calculations (MW) for each year 2025-2029 (Columns I-M, Lines 1-11, and 12-18).

B. Form S-2 and S-2A:

Applicant’s Form S-2 contains the following confidential information:

1. Applicant’s actual capacity supply resources and Capacity/Energy Balance Summary (MW) for the historical period 2023-2024 (Columns A-Q (capacity), and Columns AC-AD (energy), Lines 6a-11).

2. Applicant's forecast capacity supply resources and Capacity/Energy Balance Summary (MW) for each year 2025-2029 (Columns R-V (capacity), and Columns AE-AI (energy), Lines 6a-11).

Applicant's Form S-2A contains the following confidential information:

1. Applicant's monthly forecast capacity supply resources for each year 2025-2029 (Columns A-BN (capacity), lines 11-145).

3. Form S-5 (Bilateral Contracts Table):

Applicant's Form S-5 includes confidential information regarding the terms and conditions of Applicant's bilateral contracts. All of this information (Columns B-M, Lines 6c-7e rows 10-105) is confidential.

Length of Time for Which Information Should Be Maintained on a Confidential Basis

Shell Energy requests that the historical information for 2023-2024 in Form S-1, Form S-2 and Form S-2A that is designated as confidential be maintained on a confidential basis for a period no less than one (1) year (through December 31, 2026), and that forecast information for 2025-2029 in Form S-1, Form S-2 and Form S-2A that is designated as confidential be maintained on a confidential basis for a period no less than three (3) years (through December 31, 2028). Confidential information in Form S-5 should be designated as confidential for three (3) years (through December 31, 2028).

Aggregation of Data

The confidential information submitted by Applicant in the attached forms (Forms S-1, S-2 and S-2A) (except the names of individual generation facilities) may be released to the public if first aggregated with the data and information submitted by other load-serving entities ("LSEs"), as follows:

* Information about historical and forecasted demand in Form S-1 should be aggregated with the historical and forecasted demand information of all electric service providers ("ESPs").

* Information about historical and forecasted energy and capacity supplies in Forms S-2 and S-2A should be aggregated with the historical and forecasted energy and capacity information of all other ESPs.

Confidential information in the "Bilateral Contracts Table" (Form S-5) is unique to the bilateral contracts entered into by Applicant and cannot be aggregated with information provided by other LSEs.

Penalty of Perjury Certification

I certify, under penalty of perjury, that this information is substantially similar to information previously submitted in Docket Nos. 19-IEPR-02, 22-IEPR-03, 24-IEPR-02 and 25-IEPR-03 for which confidential treatment was granted (except that confidential treatment is requested for information for the years 2023 through 2029), and that all the facts and circumstances relevant to confidentiality remain unchanged, in accordance with CCR Title 20, Section 2505(a)(4).



Dated: November 14, 2025

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