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Via CEC E-Comment System

November 14, 2025

Drew Bohan, Executive Director
California Energy Commission
1516 Ninth Street MS-39
Sacramento, CA 95814-5504

Re: Docket No. 25-IEPR-02
Electricity Resource Plan of Shell Energy North America (US), L.P.

Dear Mr. Bohan:

In accordance with the requirements and instructions for the 2026 Integrated Energy Policy Report Update, attached are the 2025 IEPR Supply Forms submitted by Shell Energy North America (US), L.P. ("Shell Energy").

Shell Energy requests that the Commission designate as confidential certain information contained in the IEPR. Specifically, Shell Energy seeks confidential treatment for certain historical and forecast demand and supply data in Forms S-1, S-2 and S-2A, and bilateral contract information in Form S-5. The information for which Shell Energy seeks confidential treatment is highlighted in yellow. This information is not already public and its disclosure could compromise Shell Energy's competitive position in the electricity markets. Shell Energy seeks confidential treatment of this information for all years 2023 through 2029.

The Commission's instructions and California Code of Regulations, Title 20, Section 2505(a)(4), provide that information submitted to the Commission may be deemed confidential without the need for a new Application for Designation of Confidential Records if the Applicant submits a Certification under penalty of perjury that the new information is substantially similar to information that was previously granted a confidential designation. Shell Energy's previous application for designation of confidential records in Docket No. 24-IEPR-02 was approved on December 4, 2024. A Certification to that effect is linked here:
<https://efiling.energy.ca.gov/GetDocument.aspx?tn=260468&DocumentContentId=96751>

Shell Energy provides the following narrative explanation of certain items in Forms S-1.

First, in Form S-1, the Commission asks for the effects of demand response, energy efficiency, self-generation, distributed generation, and other adjustments that decrease retail load. As an ESP, Shell Energy accommodates customer-side generation, but Shell Energy does not quantify customer-side generation, demand response or other adjustments that decrease load.

Shell Energy only delivers the energy necessary for consumption. All customer-side generation simply reduces the amount of energy Shell Energy sells to the customer.

Second, in Form S-1, Lines 2a and 2b, the Commission seeks identification of “Existing” Customer Contracts versus “New” and “Renewed” Customer Contracts. Shell Energy considers all contracts to be “Existing” Contracts.

Third, Shell Energy’s demand “forecasts” in Form S-1 are based on retail load currently under contract, where Shell Energy assumes all load currently under contract will be maintained unless otherwise expressly notified for years 2025-2026. Shell Energy’s “forecasts” for 2027-2029 in Form S-1 are based on customer load under contract at present and their associated volumes that are captured in its system. Shell Energy’s data is submitted in accordance with Senate Bill 1389, Statutes of 2002 (Bowen), which requires a person to submit only information that is “reasonably relevant, and that the person can either be expected to acquire through his or her market activities, or possesses or controls.” Pub. Res. Code Section 25320(b)(2).

The filing consists of four Excel Spreadsheets, denominated S-1, S-2, S-2A and S-5. The attached file is 2.55 MB in size. It is dated November 14, 2025.

Please do not hesitate to contact me if you have any questions regarding this filing.

Regards,



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Attachments as noted