

DOCKETED

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April 24, 2015

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

Re: Docket #15-IEPR-02: Shell Energy Electricity Resource Plan

Mr. Oglesby:

In accordance with the requirements and instructions for the 2015 Integrated Energy Policy Report, please find enclosed the Shell Energy North America (US), L.P. ("Shell Energy") electricity resource plan ("ERP"). Shell Energy seeks confidential treatment for specific historical and forecast data on Forms S-1 and S-2, and specific 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. An application for confidential treatment is attached.

In addition, certain categories of information are subject to an automatic designation of confidentiality under Title 20, Section 2505 of the California Code of Regulations.

In addition to its application for designation of confidential records, Shell Energy provides this narrative explanation of certain items in Forms S-1 and S-2.

First, in Form S-1, the CEC asks for the effects of private supply, quantification of 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-2, the CEC seeks identification of "Existing" Contracts versus "New" and "Renewed" Contracts. Shell Energy considers all contracts to be "Existing" Contracts unless a contract has been executed for a future delivery date.

Third, as noted in all of its CEC compliance filings, Shell Energy does not model its retail load in order to develop forward forecasts. Because most ESP contracts are short term in nature, Shell Energy's "forecasts" in Form S-1 are based on retail load currently under contract, where Shell Energy anticipates that those customers will remain customers through the end of the

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calendar year. Shell Energy's "forecasts" in Form S-2 are based on current contracts and their associated volumes that are captured in our Nucleus 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).

Fourth, in Form S-1, the CEC seeks the "coincident peak adjustment" to Shell Energy's load requirements. Shell Energy has not included the coincident adjustment provided by the CEC for prior years in this submission due to its subjective nature. In fact, Shell Energy is challenging the CEC's coincident peak adjustment methodology in CPUC Docket No. R.14-10-010. Additionally, Shell Energy does not have the necessary data to calculate an appropriate coincident peak adjustment factor at this time. Shell Energy is hopeful that the CEC will make the methodology and all underlying calculations available for future filings.

The ERP filing consists of three Excel Spreadsheets, denominated S-1, S-2, and S-5. The enclosed ERP is 481 kilobytes in size. It is dated April 24, 2015.

An officer verification is enclosed per the instructions relative to requesting confidentiality. Shell Energy acknowledges that some information may be disclosed after aggregation.

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

Regards,



Marcie A. Milner
Vice President, Regulatory Affairs
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Enclosures

cc: Jim Woodward

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

In the Matter of:

Preparation of the 2015 Integrated Energy
Policy Report (IEPR)

Docket No. 15-IEPR-02

**APPLICATION OF SHELL ENERGY NORTH AMERICA (US) L.P.
FOR DESIGNATION OF CONFIDENTIAL RECORDS**

Pursuant to Section 25322 of the Public Resources Code ("PRC") and Section 2505(a) of Title 20 of the California Code of Regulations ("CCR"), Shell Energy North America (US) L.P. ("Applicant") hereby requests that the Commission designate as confidential certain information contained in the attached Electricity Resource Plan ("ERP") being submitted by Applicant this date (April 24, 2015). The information in the ERP 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 demand (MW) for each year 2013-2014 (Columns C and D, Lines 1-11 and 27-33).
2. Applicant's forecast peak demand (MW) for each year 2015-2017 (Columns E-G, Lines 1-11).
3. Applicant's actual capacity supply resources (MW) for the historical period 2013-2014 (Columns C and D, Lines 12a-26).
4. Applicant's forecast capacity supply resources (MW) for each year 2015-2017 (Columns E-G, Lines 12a-26).

B. Form S-2:

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

1. Applicant's actual historical energy demand/consumption for its retail customer load for each year 2013-2014 (Columns C and D, Lines 1-7).
2. Applicant's forecast energy demand/consumption for its retail customer load for each year 2015-2017 (Columns E-G, Lines 1-7).

3. Applicant's actual historical and forecast energy supply resources for its retail sales load for each year 2013- 2014 (historical) and 2015-2017 (forecast) (Columns C-G, Lines 8a-16).
4. Applicant's "Energy Balance Summary" for each year 2013- 2014 (historical) and 2015-2017 (forecast) (Columns C-G, Lines 17-19).

C. 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 A-X, Lines 9-39) is confidential.

D. Request for Confidential Designation

Applicant requests that all of the historical information for 2013-2014 contained in Form S-1 and Form S-2 be designated as confidential for one (1) year, and that all forecast information for 2015-2017 contained in Form S-1 and Form S-2 be designated as confidential for three (3) years. Confidential bilateral contract information in Form S-5 (Bilateral Contracts Table) should be designated as confidential for three (3) years.

E. Grounds for Confidential Designation

Applicant requests that the Commission provide a confidential designation for the referenced information in Forms S-1, S-2 and S-5 because this information constitutes proprietary trade secret information under Government Code Section 6254.15. Public disclosure of this information could competitively harm Applicant because the information reflects Applicant's total historical and forecast retail load in the service territories of the California investor-owned electric utilities, as well as the supply quantities acquired by Applicant to serve this retail load. Public disclosure of this information would reveal Applicant's net short position, thereby placing Applicant at a competitive disadvantage in the wholesale and retail electricity markets. Public disclosure of bilateral contract terms and conditions would reveal Applicant's negotiating strategy and harm Applicant in future contract negotiations.

The information has not been disclosed publicly and is treated as confidential by Applicant. The public interest in nondisclosure of this information outweighs the public interest in disclosure.

F. Aggregation of Data

The confidential information submitted by Applicant in the attached ERP forms (Forms S-1 and S-2) 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 Forms S-1 and S-2 should be aggregated with the historical and forecasted demand information of all electric service providers ("ESPs").

- Information about historical and forecasted power supplies in Forms S-1 and S-2 should be aggregated with the historical and forecasted estimated power supply information of all other ESPs.

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.

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

Applicant requests that the historical information for 2013-2014 in Form S-1 and Form S-2 that is designated as confidential be maintained on a confidential basis for a period no less than one (1) year, and that forecast information for 2015-2017 in Form S-1 and Form S-2 that is designated as confidential be maintained on a confidential basis for a period no less than three (3) years. Confidential information in Form S-5 should be designated as confidential for three (3) years.

H. Penalty of Perjury Certification

The information that is eligible for an automatic confidentiality designation has not been previously released publicly and the information falls within category B2 and B3(a) of Section 2505(a)(5) of the CCR. In accordance with Section 2505(a)(1)(G), Applicant attaches hereto a certificate under penalty of perjury executed by the person primarily responsible for preparing the application.

Dated: April 24, 2015

Respectfully submitted,



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