

## DOCKETED

<b>Docket Number:</b>	17-IEPR-03
<b>Project Title:</b>	Electricity and Natural Gas Demand Forecast
<b>TN #:</b>	217122
<b>Document Title:</b>	Shell Energy North Application for Conf
<b>Description:</b>	Application of Shell Energy North America (US) L.P. for Designation of Confidential Records for Form 7.1
<b>Filer:</b>	Patty Paul
<b>Organization:</b>	Dentons US LLP
<b>Submitter Role:</b>	Public
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<b>Docketed Date:</b>	4/17/2017

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

In the Matter of:

The 2017 Integrated Energy Policy Report  
(2017 IEPR)

Docket No. 17-IEPR-03

**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 Demand Forecast (Form 7.1) that is being submitted by Applicant this date (April 17, 2017).

A. Form 7.1 (ESP)

Applicant’s Form 7.1 contains the following confidential information on a disaggregated basis for each of the electric utilities’ distribution areas:

1. Applicant’s actual historical retail sales (MWh) for each year 2015-2016 (cells C, H, M: 12-13).
2. Applicant’s forecast retail sales (MWh) for each year 2017-2019 (cells C, H, M: 14-16).
3. Applicant’s actual historical peak demand (MW) for each year 2015-2016 (cells C, H, M: 12-13).
4. Applicant’s forecast peak demand (MW) for each year 2017-2019 (cells C, H, M: 14-16).
5. Applicant’s actual historical customer count (residential and nonresidential) for each year 2015-2016 (cells C, H, M: 12-13).
6. Applicant’s forecast customer count (residential and nonresidential) for each year 2017-2019 (cells C, H, M: 14-16).

B. Request for Confidential Designation

Applicant requests that all of the historical information contained in Form 7.1 (ESP) be designated as confidential for one (1) year (through December 31, 2018), and that all forecast information contained in Form 7.1 (ESP) for the years 2017-2019 be designated as confidential for three (3) years (through December 31, 2020).

C. Grounds for Confidential Designation

Applicant requests that the Commission provide a confidential designation for the referenced information in Form 7.1 (ESP) 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 retail load in the service territories of the California investor-owned electric utilities for the most recent two-year period, and Applicant's total forecast retail load in the service territories of the California investor-owned electric utilities for the current year and the next two succeeding years. Public disclosure of this information would reveal Applicant's net short position in the immediate past and future periods, thereby placing Applicant at a competitive disadvantage in the wholesale and retail electricity markets.

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.

D. Aggregation of Data

The confidential information submitted by Applicant in the attached Electricity Demand Forecast (Form 7.1) 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 7.1 should be aggregated with the historical and forecasted demand information of all electric service providers ("ESPs").

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

Applicant requests that the historical information in Form 7.1 (ESP) that is designated as confidential be maintained on a confidential basis for a period no less than one (1) year (through December 31, 2018), and that forecast information in Form 7.1 (ESP) that is designated as confidential be maintained on a confidential basis for a period no less than three (3) years (through December 31, 2020).

F. 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 17, 2017

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Marcie A. Milner", is written over a horizontal line.

Marcie A. Milner  
Vice President, Regulatory Affairs  
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April 17, 2017

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

Re: Docket #17-IEPR-03: Shell Energy Electricity Demand Forecast (Form 7.1 (ESP))

Mr. Oglesby:

In accordance with the requirements and instructions for the 2017 Integrated Energy Policy Report, please find enclosed the Shell Energy North America (US), L.P. ("Shell Energy") electricity demand forecast (Form 7.1). Shell Energy seeks confidential treatment for the historical and forecast load data on Form 7.1 that 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.

Shell Energy encloses the completed CEC Electricity Demand Forecast, Excel Spreadsheet Form 7.1. The filing consists of one worksheet and is 447 kilobytes in size. It is dated April 17, 2017.

An officer verification is enclosed per the Energy Commission's 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 filing.

Regards,

A handwritten signature in black ink that reads "Marcie A. Milner".

Marcie A. Milner  
Vice President, Regulatory Affairs  
Shell Energy North America (US), L.P.  
[Marcie.milner@shell.com](mailto:Marcie.milner@shell.com)  
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Enclosures

**OFFICER VERIFICATION FORM**

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct and complete to the best of my knowledge. I also certify that I am authorized to make the application and certification on behalf of Shell Energy North America (US), L.P.

Ed Brown, Vice President, West Retail  
Printed Name and Title

April 17, 2017  
Date

  
Signature

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

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