

**DOCKETED**

<b>Docket Number:</b>	19-IEPR-03
<b>Project Title:</b>	Electricity and Natural Gas Demand Forecast
<b>TN #:</b>	227692
<b>Document Title:</b>	Shell Energy North American's Application for Designation of Confidential Records and Demand Forecast Letter
<b>Description:</b>	IEPR Application for Designation of Confidential Records and Demand Forecast Letter
<b>Filer:</b>	Heather Karlstad
<b>Organization:</b>	Dentons US LLP
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	4/15/2019 3:31:35 PM
<b>Docketed Date:</b>	4/15/2019

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

In the Matter of:

The 2019 Integrated Energy Policy Report  
(2019 IEPR)

Docket No. 19-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)(4) of Title 20 of the California Code of Regulations (“CCR”), Shell Energy North America (US) L.P. (“Applicant”) hereby submits this application, with a certification, executed under penalty of perjury, concerning the designation of a portion of Applicant’s “historical” and “forecast” demand information in Form 7.1 as confidential. The confidential information is contained in the attached Electricity Demand Forecast (Form 7.1) that is being submitted by Applicant this date (April 15, 2019).

Applicant seeks a confidential designation for information that is substantially similar to information for which an application for confidential designation was previously granted by the Executive Director pursuant to CCR Title 20, Section 2505 (a)(3)(A). The information for which confidential treatment is requested is substantially similar to the previously submitted information in April 2017 (Docket No. 17-IEPR-03). All the facts and circumstances relevant to confidentiality remain unchanged.

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 2017-2018 (cells C, H, M: 12-13).
2. Applicant’s forecast retail sales (MWh) for each year 2019-2021 (cells C, H, M: 14-16).
3. Applicant’s actual historical peak demand (MW) for each year 2017-2018 (cells D, I, N: 12-13).
4. Applicant’s forecast peak demand (MW) for each year 2019-2021 (cells D, I, N: 14-16).

5. Applicant's actual historical customer count (residential and nonresidential) for each year 2017-2018 (cells F, K, P: 12-13).
6. Applicant's forecast customer count (residential and nonresidential) for each year 2019-2021 (cells F, K, P: 14-16).

B. Request for Confidential Designation

Applicant certifies that all of the indicated historical information contained in Form 7.1 (ESP) for the years 2017-2018 should be designated as confidential for one (1) year (through December 31, 2020). Applicant further certifies that all forecast information contained in Form 7.1 (ESP) for the years 2019-2021 should be designated as confidential for three (3) years (through December 31, 2022).

C. Penalty of Perjury Certification

Applicant certifies, under penalty of perjury, that the designated information submitted herewith, for which Applicant seeks confidential treatment, is substantially similar to the previously submitted information for which confidential treatment was granted, and that all the facts and circumstances relevant to confidentiality remain unchanged, in accordance with CCR Title 20, Section 2505(a)(4).

Dated: April 15, 2019

Respectfully submitted,



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Marcie A. Milner  
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April 15, 2019

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

Re: Docket #19-IEPR-03: Shell Energy Electricity Demand Forecast (Form 7.1 (ESP))

Mr. Oglesby:

In accordance with the requirements and instructions for the 2019 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. An application for confidential designation under Title 20, Section 2505(a)(4) of the California Code of Regulations is attached.

Shell Energy encloses the completed CEC Electricity Demand Forecast, Excel Spreadsheet Form 7.1. The filing consists of one worksheet and is 65 kilobytes in size. It is dated April 15, 2019.

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

Regards,

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

Marcie A. Milner  
Vice President, Regulatory Affairs  
Shell Energy North America (US), L.P.  
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Enclosures

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