

DOCKETED

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Document Title:	Shell Energy Application for Designation of Confidential Records
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**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

In the Matter of:

The 2019 Integrated Energy Policy Report
(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) 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 8.1a (ESP)) that is being submitted by Applicant this date (June 3, 2019).

A. Form 8.1a (ESP)

Applicant’s Form 8.1a (ESP) contains the following confidential information:

1. Applicant’s actual historical power supply costs (bilateral contracts and residual market transactions) for each year 2017-2018 (Columns B-C, Lines 9-12).
2. Applicant’s forecast power supply costs (bilateral contracts and residual market transactions) for each year 2019-2025 (Columns D-J, Lines 9-12)

B. Request for Confidential Designation

Applicant requests that all of the historical information contained in Form 8.1a (ESP) be designated as confidential for one (1) year, and that all forecast information contained in Form 8.1a (ESP) be designated as confidential for three (3) years.

C. Grounds for Confidential Designation

Applicant requests that the Commission provide a confidential designation for the referenced information in Form 8.1a (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 and forecast power supply costs to serve retail load in the service territories of the California investor-owned electric utilities. Public disclosure of this information would reveal Applicant’s power purchase costs, as well as a breakdown between bilateral contract costs and residual market transaction costs, 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 Form 8.1a (ESP) 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 power supply costs in Form 8.1a (ESP) 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 8.1a (ESP) that is designated as confidential be maintained on a confidential basis for a period no less than one (1) year, and that forecast information in Form 8.1a (ESP) that is designated as confidential be maintained on a confidential basis for a period no less than three (3) years.

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: June 3, 2019

Respectfully submitted,



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PENALTY OF PERJURY CERTIFICATION

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.

Marcie Milner, VP, Regulatory Affairs
Printed Name and Title

June 3, 2019
Date



Signature

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

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