

DOCKETED

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Project Title:	Electricity Resource Plans
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**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

In the Matter of:

The 2021 Integrated Energy Policy Report
(2021 IEPR)

Docket No. 21-IEPR-02

**Certification of Shell Energy North America (US), L.P.
in Support of Application for Confidential Treatment
of Portions of its Electricity Resource Plan**

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. (“Shell Energy” or “Applicant”) provides this Certification in support of its Application requesting that the Commission designate as confidential certain information contained in the attached Electricity Resource Plan (“ERP”) being submitted today, September 17, 2021. The information for which Shell Energy seeks confidential treatment is substantially the same as the information for which the Commission granted Shell Energy confidential treatment in Docket No. 19-IEPR-02 on June 5, 2019.

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 load calculations, energy demand calculations, and historic peak load (MW) for each year 2019-2020 (Columns G-H, Lines 1-11, 12-18, and 19-25).
2. Applicant’s forecast peak load calculations and energy demand calculations (MW) for each year 2021-2025 (Columns I-M, Lines 1-11, and 12-18).

B. Form S-2:

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

1. Applicant's actual capacity supply resources and Capacity/Energy Balance Summary (MW) for the historical period 2019-2020 (Columns A-H (capacity), and Columns T-U (energy), Lines 6a-11).

2. Applicant's forecast capacity supply resources and Capacity/Energy Balance Summary (MW) for each year 2021-2025 (Columns I-M (capacity), and Columns V-Z (energy), Lines 6a-11).

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 B-O, Lines 11-49) is confidential.

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

Shell Energy requests that the historical information for 2019-2020 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 (through December 31, 2022), and that forecast information for 2021-2025 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 (through December 31, 2024). Confidential information in Form S-5 should be designated as confidential for three (3) years (through December 31, 2024).

Aggregation of Data

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

* Information about historical and forecasted energy and capacity supplies in Form S-2 should be aggregated with the historical and forecasted energy and capacity information of all other ESPs.

Confidential 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.

Penalty of Perjury Certification

I certify, under penalty of perjury, that this information is substantially similar to information previously submitted in Docket No. 19-IEPR-02 for which confidential treatment was granted (except that confidential treatment is requested for information for the years 2019 through 2025), and that all the facts and circumstances relevant to confidentiality remain unchanged, in accordance with CCR Title 20, Section 2505(a)(4).

Dated: September 17, 2021



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PENALTY OF PERJURY CERTIFICATION

I certify under penalty of perjury that the information contained in this certification and 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

September 17, 2021

Date



Signature

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



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Via E-Mail and CEC E-Comment System

September 17, 2021

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

Re: Docket No. 21-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 2021 Integrated Energy Policy Report, attached is the electricity resource plan (“ERP”) 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 ERP. Specifically, Shell Energy seeks confidential treatment for certain historical and forecast demand and supply data in Forms S-1 and S-2, 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 2019 through 2025.

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. 19-IEPR-02 was approved on June 5, 2019. A Certification to that effect is included with this letter.

Shell Energy provides the following narrative explanation of certain items in Forms S-1 and S-2.

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 unless a contract has been executed for a future delivery date.

Third, Shell Energy’s demand “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 calendar year. Shell Energy’s “forecasts” in Form S-1 are based on current contracts and their associated volumes that are captured in its 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, Line 6, the Commission seeks the “coincidence adjustment” to Shell Energy’s load requirements. Shell Energy has not included, in this submission, the coincidence adjustment provided by the Commission for the years 2019 through 2022 due to the mismatch with actual load requirements as well as its subjective nature. Additionally, Shell Energy does not have the necessary data to calculate an appropriate coincidence adjustment at this time. Shell Energy is hopeful that the Commission will make the methodology and all underlying calculations for the coincidence adjustment available for future filings.

The ERP filing consists of three Excel Spreadsheets, denominated S-1, S-2, and S-5. The attached ERP is 304 kilobytes in size. It is dated September 17, 2021.

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

Regards,



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Attachments as noted