

**DOCKETED**

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<b>Project Title:</b>	Electricity Forecast
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<b>Organization:</b>	Shell Energy North America
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Via E-Mail and CEC E-Comment System

September 9, 2022

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

Re: Docket No. 22-IEPR-03  
Electricity Resource Plan of Shell Energy North America (US), L.P.

Dear Mr. Bohan:

In accordance with the requirements and instructions for the 2023 Integrated Energy Policy Report, attached are the 2022 IEPR Supply Forms 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, S-2 and S-2A, 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 2020 through 2026.

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, S-2 and S-2A.

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 2020 through 2023 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 filing consists of four Excel Spreadsheets, denominated S-1, S-2, S-2A and S-5. The attached file is 633 kilobytes in size. It is dated September 8, 2022.

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

Regards,



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Attachments as noted