



COMPLETED

April 29, 2011

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EXECUTIVE DIRECTOR

Melissa Jones, Executive Director
California Energy Commission
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DOCKET
11-IEP-1B
DATE 5/6/11
RECD. 5/2/11

RE: Docket #11-IEP-1B: Shell Energy Electricity Resource Plan

Ms. Jones:

In accordance with the requirements and instructions for submitting electricity resource plans in support of the 2011 Integrated Energy Policy Report, please find enclosed the Shell Energy North America (US), L.P. ("Shell Energy") electricity resource plan. Shell Energy seeks confidential treatment for the historical and forecast load and resource data that are 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.

The information being submitted is the completed CEC Electricity Resource Excel Spreadsheet, titled "CEC Resource Plan 2011." The filing consists of seven worksheets and is 106 kilobytes in size. It is dated April 13, 2011.

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,

Marcie A. Milner
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Enclosures

cc: Jim Woodward

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

In the Matter of:

Preparation of the 2011 Integrated Energy
Policy Report (IEPR)

Docket No. 11-IEP-1B

**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 Resource Plan that is being submitted by Applicant this date (April 29, 2011).

A. Table S-1 (Capacity Resource Accounting Table):

Applicant’s Table S-1 contains the following confidential information on “Peak Load Calculation” that is highlighted in yellow on the Excel spreadsheet:

- Line 1: Forecast Total Peak-Hour 1-in-2 Demand for 2009-2014.
- Line 2a: ESP Peak Load: Existing Customer Contracts for 2009-2010.
- Line 2b: ESP Peak Load: New and Renewed Contracts for 2009-2010.
- Line 2c: ESP Peak Load in PG&E Service Area for 2009-2014.
- Line 2d: ESP Peak Load in SCE Service Area for 2009-2014.
- Line 2e: ESP Peak Load in SDG&E Service Area for 2009-2014.
- Line 5: Adjusted Peak Hour Demand: End-use Customers for 2009-2014.
- Line 7: Coincident Peak Hour Demand for 2009-2014.
- Line 8: Required Planning Reserve Margin for 2009-2014.
- Line 11: Firm LSE Peak-Hour Resource Requirement for 2009-2014.

Applicant’s Table S-1 also contains the following confidential information on “Capacity Supply Resources” that is highlighted in yellow on the Excel spreadsheet:

- Line 19a: Total Capacity from Other Bilateral Contracts for 2009-2014.

Line 19c: Other Bilateral Supply Contract 1 for 2011-2014.

Applicant's Table S-1 also contains the following confidential information on "Capacity Balance Summary" that is highlighted in yellow on the Excel spreadsheet:

Line 21: Total: Existing and Planned Capacity for 2009-2014.

Line 22: Firm LSE Peak Hour Resource Requirement for 2009-2014.

Line 23: (Capacity Need) or Capacity Surplus for 2009-2014.

Line 27: Annual Peak Load/Actual Metered Deliveries for 2009-2010.

Line 28: Date of Peak Load for Annual Peak Deliveries for 2009-2010.

Line 29: Hour Ending (HE) for Annual Peak Deliveries for 2009-2010.

Line 33: Adjusted Annual Peak Load for 2009-2010.

B. Table S-2 (Energy Balance Accounting Table):

Applicant's Table S-2 contains the following confidential information on "Energy Demand Calculations" that is highlighted in yellow on the Excel spreadsheet:

Line 1: Forecast Total Energy Demand/Consumption for 2010-2014.

Line 2a: ESP Energy Demand: Existing Customer Contracts for 2010-2014.

Line 2c: ESP Energy Demand in PG&E service area for 2009-2014.

Line 2d: ESP Energy Demand in SCE service area for 2009-2014.

Line 2e: ESP Energy Demand in SDG&E service area for 2009-2014.

Line 5: Adjusted Energy Demand / Consumption for 2010-2014.

Line 7: Firm LSE Energy Requirement for 2010-2014.

Applicant's Table S-2 also contains confidential information on "Energy Supply Resources" that is highlighted in yellow on the Excel spreadsheet:

Line 14a: Total Energy Supply from Renewable Contracts for 2010-2014.

Line 14c: Wind (various suppliers) for 2010-2014.

Line 14d: Biofuels (various suppliers) for 2009-2014.

Line 14e: Small Hydro (various suppliers) for 2009-2014.

Applicant's Table S-2 also contains confidential information on "Energy Balance Summary" that is highlighted in yellow on the Excel spreadsheet:

Line 17: Total Energy: Existing and Planned Resources for 2010-2014.

Line 18: Firm LSE Energy Requirement for 2010-2014.

Line 19: (Energy Need) or Energy Surplus for 2011-2014.

Applicant's Table S-2 also contains confidential information on "Renewable Energy Accounting" that is highlighted in yellow on the Excel spreadsheet:

Line 26: Renewable Energy Contractual Resources for 2010-2014.

Line 31: Total Actual / Expected Renewable Energy for 2010-2014.

Line 32: Total Retail Sales for 2010-2014.

Line 33: Renewable Energy as a Percentage of Retail Sales for 2011-2014.

C. Request for Confidential Designation

Applicant requests that all of the historical information contained in Tables S-1 and S-2 be designated as confidential for one (1) year, and that all forecast information contained in Tables S-1 and S-2 be designated as confidential for three (3) years.

D. Grounds for Confidential Designation

Applicant requests that the Commission provide a confidential designation for the referenced information in Tables S-1 and S-2 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 retail load in the service territories of the California electric utilities. Disclosure of this information would reveal Applicant's net short position and would place 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 clearly outweighs the public interest in disclosure.

E. Aggregation of Data

The confidential information submitted by Applicant in the attached Electricity Resource Plan (Tables S-1 and S-2) 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 Tables S-1 and S-2 should be aggregated with the historical and forecasted demand information of all electric service providers ("ESPs").

- Information about historical and forecasted energy and capacity supply resources should be aggregated with the historical and forecasted energy and capacity supply resources of all ESPs.

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

Applicant requests that the historical information in Tables S-1 and S-2 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 Tables S-1 and S-2 that is designated as confidential be maintained on a confidential basis for a period no less than three (3) years.

G. 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 29, 2011

Respectfully submitted,



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