



COMPLETED

June 3, 2011

RECEIVED
JUN 6 2011
EXECUTIVE DIRECTOR

Melissa Jones, Executive Director
California Energy Commission
1516 Ninth Street MS39
Sacramento, CA 95814-5504

DOCKET
11-IEP-1C
DATE JUN 03 2011
RECD. JUN 06 2011

Shell Energy North America
4445 Eastgate Mall, Suite 100
San Diego, CA 92121
Tel 1+ 858 526 2109
www.shell.com/us/energy

RE: Docket #11-IEP-1C: Electricity Demand Forecast

Ms. Jones:

In accordance with the requirements and instructions for submitting electricity demand forecasts in support of the 2011 Integrated Energy Policy Report, please find enclosed Form 8.1(a)(ESP) of Shell Energy North America (US), L.P.'s ("Shell Energy's") electricity demand forecast. Shell Energy seeks confidential treatment for the historical and forecast cost data in Form 8.1(a), which is highlighted in yellow. This information is not already public and its disclosure could compromise Shell Energy's competitive position in electricity markets. An application for confidential treatment is attached.

In addition, the cost information may be 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 Demand Forecast, Excel Spreadsheet Form 8.1(a)(ESP). The other portions of Shell Energy's electricity demand forecast, including a request for confidentiality, were submitted on April 15, 2011. The filing herein consists of one worksheet and is 204 kilobytes in size. It is dated March 26, 2011. A compact disk including Form 8.1(a) is also included.

An officer verification is enclosed in accordance with the Energy Commission's instructions relative to requests for 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
Vice President, Regulatory Affairs
Shell Energy North America (US), L.P.
Marcie.milner@shell.com
(858) 526-2106

Enclosures
cc: Jim Woodward
101532770.1

**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-1C

**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 8.1(a)(ESP)) that is being submitted by Applicant this date (June 3, 2011).

A. Form 8.1(a)(ESP):

Applicant's Form 8.1(a) contains Applicant's estimated power supply costs for the periods 2008 to 2010 (historical) and 2011 to 2014 (forecast). This information, which reflects the product of the volumes and prices for Applicant's power supply purchases, is market sensitive information that is treated as confidential by Applicant.

B. Request for Confidential Designation

Applicant requests that all of the historical information contained in Form 8.1(a) be designated as confidential for one (1) year, and that all forecast information contained in Form 8.1(a) 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 8.1(a) 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 estimated total power supply cost for its historical and forecast retail load in the service territories of the California electric utilities. Disclosure of this information could reveal the average price of Applicant's power supply resources and could 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.

D. Aggregation of Data

The confidential information submitted by Applicant in the attached Electricity Demand Forecast (Form 8.1(a)) 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 estimated power supply costs in Form 8.1(a) 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 8.1(a) 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 8.1(a) 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 may fall within category B4 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, 2011

Respectfully submitted,



Marcie A. Milner
Vice President, Regulatory Affairs
Shell Energy North America (US), L.P.
4445 Eastgate Mall, Suite 100
San Diego, CA 92121
marcie.milner@shell.com
(858) 526-2106

101533649.1

OFFICER VERIFICATION FORM

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.

Michael D'Arienzo
Vice President C & E
Printed Name and Title

5/31/11
Date


Signature

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