

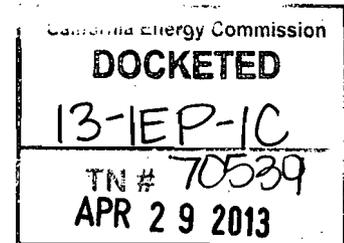
COMPLETED



Shell Energy North America
4445 Eastgate Mall, Suite 100
San Diego, CA 92121
www.shell.com/us/energy

April 26, 2013

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



RE: Docket #13-IEP-1C: Electricity Demand Forecast and Estimated Power Supply Costs

Mr. Oglesby:

In accordance with the requirements and instructions for the 2013 Integrated Energy Policy Report, please find enclosed the Shell Energy North America (US), L.P. ("Shell Energy") electricity demand forecast (Form 7) and estimated power supply costs (Form 8.1a (ESP)). Shell Energy seeks confidential treatment for the historical and forecast load data on Form 7 that is highlighted in yellow, as well as the historical and forecast estimated power supply cost data on Form 8.1a, which is also 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.

Two pieces of information are being submitted. First, Shell Energy encloses the completed CEC Electricity Demand Forecast, Excel Spreadsheet Form 7. Second, Shell Energy encloses the completed CEC Estimated Power Supply Costs, Excel Spreadsheet Form 8.1a (ESP). The filing consists of two worksheets and is 472 kilobytes in size. It is dated April 26, 2013.

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.

Robert Oglesby, Executive Director
California Energy Commission
April 26, 2013
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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 2013 Integrated Energy
Policy Report (IEPR)

Docket No. 13-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 7) and the attached Estimated Power Supply Costs (Form 8.1a (ESP)) that are being submitted by Applicant this date (April 26, 2013).

A. Form 7

Applicant's Form 7 contains the following confidential information on a disaggregated basis for each of the electric utilities' distribution areas:

1. Applicant's actual historical retail sales (MWh) for each year 2010-2012.
2. Applicant's forecast retail sales (MWh) for each year 2013-2015.
3. Applicant's actual historical peak demand (MW) for each year 2010-2012.
4. Applicant's forecast peak demand (MW) for each year 2013-2015.
5. Applicant's actual historical customer counts (residential and nonresidential) for each year 2010-2012.
6. Applicant's forecast customer count (residential and nonresidential) for each year 2013-2015.

B. Form 8.1a (ESP)

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

1. Applicant's estimated power supply costs for its bilateral contracts for each year 2010-2015.
2. Applicant's estimated power supply costs for its residual market transactions for each year 2010-2015.

C. Request for Confidential Designation

Applicant requests that all of the historical information contained in Form 7 and Form 8.1a (ESP) be designated as confidential for one (1) year, and that all forecast information contained in Form 7 and Form 8.1a (ESP) 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 Form 7 and 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 retail load in the service territories of the California investor-owned electric utilities, as well as the cost of the power purchased to serve this retail load. Public disclosure of this information would reveal Applicant's net short position would reveal the price paid by Applicant for energy and capacity, 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.

E. Aggregation of Data

The confidential information submitted by Applicant in the attached Electricity Demand Forecast (Form 7) and the attached Estimated Power Supply Costs (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 demand in Form 7 should be aggregated with the historical and forecasted demand information of all electric service providers ("ESPs").
- Information about historical and forecasted estimated power supply costs in Form 8.1a (ESP) should be aggregated with the historical and forecasted estimated power supply cost information of all other ESPs.

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

Applicant requests that the historical information in Form 7 and 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 7 and Form 8.1a (ESP) that is designated as confidential be maintained on a confidential basis for a period no less than three (3) years.

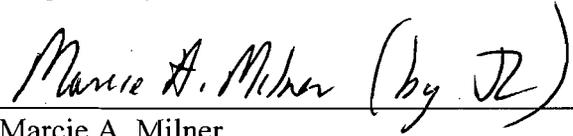
G. Penalty of Perjury Certification

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 26, 2013

Respectfully submitted,



Marcie A. Milner
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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.

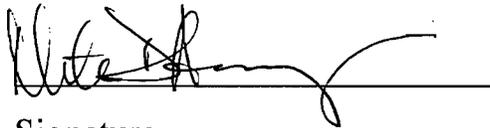
Michael D'Asenzo

V.P. Commercial & Industrial

4/23/13

Printed Name and Title

Date



Signature

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

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