

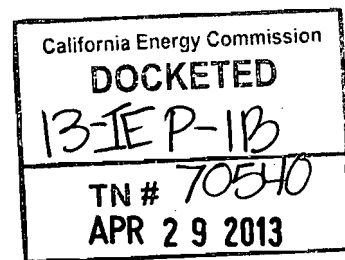
COMPLETED



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-1B: Electricity Resource Plan

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 resource plan ("ERP"). Shell Energy seeks confidential treatment for specific historical and forecast data on Forms S-1, S-2 and S-5 of the ERP. 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. 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 ERP filing consists of three Excel Spreadsheets, denominated S-1, S-2, and S-5. The enclosed ERP is 109 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 ERP filing.

Regards,

A handwritten signature in black ink that reads "Marcie A. Milner (by D)". The signature is written in a cursive, flowing style.

Marcie A. Milner
Vice President, Regulatory Affairs
Shell Energy North America (US), L.P.
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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-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 ("ERP") being submitted by Applicant this date (April 26, 2013). 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 of the electric utilities' distribution areas:

1. Applicant's actual historical peak demand (MW) for each year 2011-2012 (Lines 27-33).
2. Applicant's forecast peak demand (MW) for each year 2013-2015 (Lines 1-11).
3. Applicant's actual capacity supply resources (MW) for the historical period 2011-2012 (Lines 12-26).
4. Applicant's "notation and disclosure" blocks that provide confidential information regarding Applicant's energy procurement practices.

B. Form S-2:

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

1. Applicant's actual historical energy demand/consumption for its retail customer load for each year 2011-2012 (Lines 1-7).
2. Applicant's forecast energy demand/consumption for its retail customer load for each year 2013 - 2015 (Lines 1 - 7).

3. Applicant's actual historical and forecast energy supply resources for its retail sales load for each year 2011 – 2012 (historical) and 2013-2015 (forecast) (Lines 8-21).
4. Applicant's "notation and disclosure" blocks that provide confidential information regarding Applicant's energy procurement practices.

C. Form S-5:

Application's Form S-5 includes three "tabs": "Bilateral Contract A;" "Bilateral Contract B;" and "Table." On each Tab, Applicant's "notation and disclosure" blocks provide confidential information regarding Applicant's energy procurement practices.

D. Request for Confidential Designation

Applicant requests that all of the historical information for 2011-2012 contained in Form S-1 and Form S-2 be designated as confidential for one (1) year, and that all forecast information for 2013 – 2015 contained in Form S-1 and Form S-2 be designated as confidential for three (3) years. Confidential information in the "notation and disclosure" blocks in Forms S-1, S-2 and S-5 should be designated as confidential for three (3) years.

E. Grounds for Confidential Designation

Applicant requests that the Commission provide a confidential designation for the referenced information in Forms S-1, S-2 and S-5 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 supply quantities acquired by Applicant to serve this retail load, and the energy supply procurement strategy employed by Applicant. Public disclosure of this information would reveal Applicant's net short position and its procurement strategy, 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.

F. Aggregation of Data

The confidential information submitted by Applicant in the attached ERP forms (Forms S-1, S-2 and S-5) 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 Forms 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 power supplies in Forms S-1 and S-2 should be aggregated with the historical and forecasted estimated power supply information of all other ESPs.

- Information in the “notation and disclosure” blocks (in Forms S-1, S-2 and S-5) cannot be aggregated with information provided by other LSEs.

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


Applicant requests that the historical information for 2011-2012 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, and that forecast information for 2013 – 2015 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. Confidential information in the “notation and disclosure” blocks in Forms S-1, S-2 and S-5 should be designated as confidential for three (3) years.

H. 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,



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