

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider
Program Refinements, and Establish Annual
Local Procurement Obligations.

R.11-10-023

**COMMENTS OF
SHELL ENERGY
NORTH AMERICA (US), L.P. ON
STAFF PROPOSAL FOR IMPLEMENTATION
OF THE FLEXIBLE CAPACITY
PROCUREMENT FRAMEWORK**

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