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Via E-Mail and Overnight Delivery

August 1, 2014

Edward F. Randolph  
Director, Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: R.11-05-005: Shell Energy North America (US), L.P.'s  
Preliminary 2013 Annual RPS Compliance Report

Dear Mr. Randolph:

In accordance with D.12-06-038 (June 21, 2012), Shell Energy North America (US), L.P. ("Shell Energy") hereby submits its "2013 Preliminary Annual 33% RPS Compliance Report." As provided in D.08-04-023 (April 10, 2008), Shell Energy seeks confidential treatment of portions of its Preliminary 2013 Report based on the "Declaration" that accompanied Shell Energy's August 2008 RPS compliance report, which was submitted on August 18, 2008. The list of confidential "cells" in the report is attached as Appendix A.

Shell Energy responds to the narrative reporting requirements as follows:

Narrative Questions:

Pursuant to Public Utilities Code Section 399.13(a)(3), each retail seller must include the following narrative information in each Annual Compliance Report and in the final report for each compliance period:

1. The status of any necessary siting and permitting approvals from federal, state, and local agencies for those eligible renewable energy resources procured by the retail seller that have not yet attained their commercial on-line dates.

Response: N/A

2. Identification of all procurement from eligible renewable energy resources located outside California and within the WECC during the period covered by the report. Retail sellers should submit a list of facilities in a matrix format including: facility name, location (City and State), and the amount of renewable energy credits (RECs) procured during the year covered by the report (i.e. 2013 for this report). If a retail seller did not procure any RECs from out of state facilities, please include a brief summary on whether





