

DOCKETED	
Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	265129
Document Title:	Repeated Application for Confidential Designation_Data Adequacy Response BIO-2pdf
Description:	Repeated application for confidential designation of materials previously submitted through Kiteworks.
Filer:	Samantha G. Neumyer
Organization:	Climate Edge Law Group
Submitter Role:	Applicant Representative
Submission Date:	7/29/2025 6:17:53 PM
Docketed Date:	7/30/2025

E-Filed

July 29, 2025

Mr. Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Willow Rock Energy Storage Center (21-AFC-02): Repeated Application for Confidential Designation of Biological Resources Information

Dear Mr. Bohan:

Pursuant to Title 20, section 2505(a)(4), of the California Code of Regulations, GEM A-CAES, LLC (the “Applicant”) hereby submits this Repeated Application for Confidential Designation for the following biological resources information, which was previously submitted through the CEC’s *Kiteworks* system in support of the Supplemental Application for Certification for the Willow Rock Energy Storage Center (“WRESC”):

- Willow Rock Data Adequacy Response, Attachment BIO-2

Willow Rock Data Adequacy Response, Attachment BIO-2 consists of Supplemental Application for Certification Figures 5.2-1a and 5.2-1b revised to be depicted at a scale of 1:2400.

By letter dated June 1, 2022, pursuant to Title 20, section 2505(a)(3)(A), of the California Code of Regulations, the Executive Director approved the initial request for confidential designation of certain information relating to biological resources for the Willow Rock Energy Storage Center.¹ The Applicant requested confidential designation for information relating to biological resources via a repeated application for confidential designation on March 4, 2024.² This request was granted by the Executive Director by letter dated May 21, 2024.³

The Applicant again requested confidential designation for biological resources information via repeated applications for confidential designation on September 27, 2024,⁴ for which the Executive Director granted confidentiality by letter dated October 9, 2024,⁵ and on October 28, 2024,⁶ for which the Executive Director granted confidentiality by letter dated November 22,

¹ TN: 243369.

² TN: 254789.

³ TN: 256496.

⁴ TN: 259339.

⁵ TN: 259494.

⁶ TN: 259737.

2024.⁷ Because the biological resources information listed above contains information that is substantially similar to the previously submitted information, and all facts and circumstances relevant to the confidentiality of the information remain unchanged, the Applicant is submitting this repeated application out of an abundance of caution should California Energy Commission Staff determine that this information should be maintained as confidential.

The Applicant notes that portions of the documents above may contain general or other information that can be made publicly available or provided in a redacted version. If needed, the Applicant requests that California Energy Commission Staff work with the Applicant to prepare redacted versions of the documents identified above that can be made available for public disclosure.

I certify under penalty of perjury of the laws of the State of California the information described above is substantially similar to the previously submitted information and that all the facts and circumstances relevant to confidentiality remain unchanged. I am authorized to make this repeated application and certification on behalf of the Applicant, GEM A-CAES LLC, a Limited Liability Company.

Please contact us at (916) 629-4141 should you have any questions or require additional information. Thank you.

Dated: July 29, 2025

CLIMATE EDGE LAW GROUP

/s/

Jeffery D. Harris

Samantha G. Neumyer

Attorneys for Applicant

⁷ TN: 260232.