

DOCKETED	
Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	265131
Document Title:	250730_Repeated Application for Confidential Designation_WRESC Confidential Appendix 53B_Appendix E Vol 1
Description:	N/A
Filer:	Samantha G. Neumyer
Organization:	Climate Edge Law Group
Submitter Role:	Applicant Representative
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July 30, 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 Cultural 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 cultural 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”):

- Cultural Resources Assessment of Willow Rock Energy Storage Center (“WRESC”) Advanced Compressed Air Energy System (A-CAES) Project, Appendix E: Previous Studies, Vol. 1

A repeated application for confidential designation for this information was previously submitted by the Applicant on March 7, 2024.¹ Confidential designation was granted by the Executive Director by letter dated May 21, 2024.²

The 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 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.

¹ TN: 254905.

² TN: 256496.



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

Dated: July 30, 2025

CLIMATE EDGE LAW GROUP

/s/

Jeffery D. Harris
Samantha G. Neumyer

Attorneys for Applicant