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**STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission**

In the Matter of:

Application for Certification of the
Willow Rock Energy Storage Center

Docket No. 21-AFC-02

**WILLOW ROCK ENERGY STORAGE CENTER
PREHEARING CONFERENCE STATEMENT**

In accordance with the Committee’s *Notice of Prehearing Conference and Evidentiary Hearing, Fifth Revised Scheduling Order, and Further Orders* issued on July 17, 2025 (“Prehearing Order”)¹, GEM A-CAES LLC (the “Applicant”) submits this Prehearing Conference Statement and Exhibit List for the Willow Rock Energy Storage Center (the “WRESC”).

I. NOTICE OF INFORMAL HEARINGS

The Prehearing Order states that the Committee has elected to conduct all or portions of the forthcoming evidentiary hearings using an informal hearing procedure. With respect to the format for the informal hearing process set forth in the Prehearing Order, the Applicant does not have any objections except with respect to the procedures for questioning of expert witnesses.

The Prehearing Order states that questions from the parties will be permitted “to the extent the Committee finds the questioning productive.” (Prehearing Order, p. 4.) The scope or type of questioning that may be found to be productive or not productive is unclear. Due to the anticipated differences in positions between the parties on certain subject areas, such as Biological Resources and Visual Resources, the Applicant is concerned that the informal hearing process may not afford the Applicant with the opportunity to question the expert witnesses with the necessary degree of scrutiny and care.

Although the Prehearing Order does not require parties to agree to or object to the possible use of informal procedures in this Prehearing Conference Statement, out of an abundance of caution, the Applicant states its objection to the use of the informal hearing process to the extent that it may prejudice the Applicant’s ability to cross examine parties on these issues as needed.

As the Commission’s Regulations affirm, “Except where otherwise provided by law, the applicant has the burden of producing evidence to support all findings and conclusions required for certification of the site and related facilities.” (20 CCR § 1745.) The Applicant appreciates the Committee’s plan to have the expert witnesses for each party “provide a brief opening statement summarizing the key points and conclusions of their testimony,”² and believes this proposal for opening statement will afford the focus that is required for productive hearings. In addition to this important beginning, due

¹ TN#: 264853.

² Id. at p. 4.

to the Applicant's burden for the proceeding, the Committee should afford the Applicant the right to conduct limited direct testimony, cross examination, and the right to offer closing testimony for each subject matter panel in a "hybrid" of the formal and informal processes.

The Applicant looks forward to discussing this hybrid approach with the Committee and the Parties at the Prehearing Conference.

II. RESPONSES TO SPECIFIC INFORMATION REQUESTS IN THE PREHEARING ORDER

The Applicant provides the following responses to the Prehearing Order's direction to the parties to provide information under separate headings regarding the following.

1. The subject areas that are complete and ready to proceed to Evidentiary Hearing.

All subject areas set forth in California Energy Commission Staff's Final Staff Assessment (TN 264843) are complete and ready to proceed to Evidentiary Hearing.

2. The subject areas upon which the Party proposes to introduce testimony in writing rather than through oral testimony.

The Applicant proposes to introduce all testimony in writing rather than through oral testimony for all subjects with the exception of the following subject areas:

- Biological Resources
- Visual Resources

The Applicant also notes that the issues of Water Resources, Land Use, and others may have disputed legal issues that may be more appropriate for legal briefing. The Applicant will be prepared to highlight these legal issues at the Prehearing Conference if so directed.

3. The subject areas that are not complete and not yet ready to proceed to Evidentiary Hearing and the reasons therefor.

All subject areas set forth in California Energy Commission Staff's Final Staff Assessment (TN 264843) are complete and ready to proceed to Evidentiary Hearing.

4. The subject areas that remain disputed and require adjudication, and the precise nature of the dispute for each issue.

The subject areas that remain disputed and require adjudication, and the precise nature of the dispute for each issue are as follows.

Biological Resources

- **Mitigation Acreage:** Siting of the WRESC facility is condensed to an eighty-eight and six tenths acre (88.6 acre) portion of a parcel located next to State Highway 14, the Sierra Highway, and an active Union Pacific railroad line, approximately one mile from an approved 174 acre steel mill. For the 88.6 acre WRESC site, the FSA requests a total of 843 acres of offsite compensatory mitigation to be preserved from future development via conservation easement in perpetuity including a funding endowment. While not expressly calculated on that basis, this request for 843 acres of mitigation is effectively **the functional equivalent of a mitigation ratio of nine and one-half acres to one (9.5-to-1)**: 843 acres mitigation lands divided by the 88.6 acre site = 9.51-to-1 ratio.

As set forth in Applicant's Opening Testimony and elsewhere in the Exhibits to be introduced, the effective 9.5-to-1 mitigation ratio is unprecedented and inconsistent with other similarly situated projects in Kern County and throughout the State. The FSA does not justify the calculation methodology or regulatory basis for requiring 843 acres of mitigation.

- **Treatment of Temporary Impacts:** The FSA treats temporary impacts to land (laydown areas, parking, and temporary construction access) as permanent. Not only does treatment of temporary impacts as "permanent" read out the concept of "temporary," it would actually result in a distorted mitigation regimen where temporary impacts would require more mitigation than permanent impacts, given proposed restoration obligations. Specifically, the FSA not only applies the same 3:1 permanent impact mitigation ratio to temporary impacts, but in addition, the FSA requires temporary impact areas to be restored, and the success of restoration efforts monitored for a 5-year period. Areas that are permanently impacted would not have a restoration obligation for construction and operations of the project. The FSA does not justify the basis for requiring temporary impacts to be treated as permanent.
- **Mitigation Ratios:** The FSA requires 3:1 mitigation ratios for both temporary and permanent impacts. In addition to treating temporary impacts as permanent, the FSA's calculations treat the entire site as if the entire 88.6 acres is suitable, high quality habitat for Crotch's Bumble Bee and the Burrowing Owl, which it is not.

In its Opening Testimony, the Applicant proposes mitigation ratios that appropriately affect the different nature of the impacts, based on lands actually impacted: (a) 2:1 mitigation for permanent impacts and (b) 1:1 for temporary impacts. The mitigation ratio of 1:1 for temporary is particularly appropriate given the FSA proposed conditions of certification require restoration of temporary impact areas. The FSA does not justify the basis for treating the entire WRESC site as suitable, high quality habitat and requiring 3:1 mitigation for both temporary and permanent impacts to that habitat.

- **Mitigation for Actual Impacts, Not Total Acreage Surveyed:** The acreage proposed for mitigation in the FSA appears to include the total acreage surveyed for the Project Area, which

includes temporary construction areas, buffer areas around temporary and permanent disturbance footprints, and route options for the gen-tie line that would not be built if the preferred pathway is constructed. Instead, mitigation should be based upon acreage actually impacted by the project, not the optional potential areas.

The mitigation acreage should be adjusted to reflect the actual areas disturbed, not the areas surveyed. The FSA does not justify the basis for requiring mitigation for areas that may not be disturbed by the project. The Applicant will work with the Parties to develop proposed condition of certification language relating to Biological Resources that incorporates the recent agreement reached with Intervenor California Unions for Reliable Energy (TN #: 265375) and the Applicant's review of CEC Staff's Rebuttal Testimony.

Visual Resources

- **Methodology**: The analyses of the FSA and the Applicant diverge due to differing methodologies. The Applicant respectfully submits that the FSA's analysis does not take into consideration the interaction of predicted visual changes from the Project within the context of viewers – the viewer's experience in determining the significance of visual effects. In contrast, the Applicant's assessment considers visual impacts related not just to anticipated visual change but also how the visual contrast of the Project may interact with a viewer's experience.
- **Significance**: The FSA finds that the potential impacts cannot be mitigated to a level of less than significant. In contrast, the Applicant's analysis finds instead that the visual impacts can be mitigated to a level of less than significant precisely by implementing the measures agreed to by both parties in the language of the FSA's proposed COC VIS-1. The Applicant maintains that the agreed to COC VIS-1 is expected to be effective at mitigating potential impacts to less than significant.
- **Agreement On the Record Supporting a Statement of Overriding Consideration**: Assuming a finding that potential impacts to visual resources are significant and cannot be mitigated, the FSA and Applicant agree that substantial evidence in the record supports a CEQA Statement of Overriding Considerations.

Again, as noted above, there are disputed legal issues in these areas and others, including Land Use Water Resources, and others that may be more appropriate for legal briefing. With respect to Land Use, for example, the conditions of certification can be read as inappropriately delegating the Commission's exclusive jurisdiction over siting facilities to local governments. The Commission should assert its exclusive permitting authorities under the Public Resources Code ("PRC"), Sections 25000 *et seq.*

Similarly, with respect to Water Resources, the conditions of certification can be read as inappropriately delegating the Commission's exclusive jurisdiction over siting facilities to the Department of Water Resources Division of Safety of Dams ("DSOD"). As drafted, the Water

Resources COCs can be read as effectively requiring the Applicant to engage in *two* State Law permitting processes and pay two sets of State law permit application fees, all contrary to the Commission’s exclusive jurisdiction per PRC 25000 *et seq.* and sound policy, unnecessarily creating the potential for delay for this important long duration energy storage project.

For the avoidance of doubt, the Applicant welcomes the Commission coordinating with DSOD to bring DSOD’s expertise into the process, to the extent required by then applicable law. Further, the Applicant is amenable to the possibility of paying DSOD processing fees for the actual costs of DSOD’s review (as opposed to a second State law application fee expected to be nearly one million dollars). The Applicant welcomes DSOD’s expertise and is amenable to paying reasonable fees for expertise brought to bear, accompanied by appropriate cost accounting.

We emphasize again that the Commission and DSOD must clearly state how they will coordinate in their reviews. The agencies should also set forth in writing a clear articulation on the question of State Law jurisdiction given the Commission’s pre-emptive authority per PRC 25000 *et seq.* and how they will coordinate in their reviews. At the end of the day, the Commission must ensure that the Warren-Alquist Act’s prime directive with respect to power plant siting remains undiluted and unobscured as the “one stop” forum for State Law issues.

The Applicant will be prepared to highlight and discuss these legal issues as directed by the Committee at the Prehearing Conference.

5. **The identity of each expert witness the Party intends to sponsor at the Evidentiary Hearing, the subject area(s) about which the expert witness(es) will offer testimony, whether the testimony will be oral or in writing, a brief summary of the testimony to be offered by the expert witness(es), qualifications of each expert witness, the time required to present testimony by each expert witness, and whether the expert witness seeks to testify via Zoom.**

WITNESS PANEL	SUBJECT AREA	TESTIMONY FORMAT/ TIME	SUMMARY
Kate Moss, Scott Crawford, Laurel Lees, Curt Hildebrand, Victor Grille, Cody Niehus and David Stein (Panel composed of Biological Resources and Project Description Witnesses Identified in Pre-filed Testimony)	Biological Resources	Pre-filed written testimony and oral testimony at the Evidentiary Hearing (approximately 25 minutes)	See Response to 4 above.

WITNESS PANEL	SUBJECT AREA	TESTIMONY FORMAT/ TIME	SUMMARY
Daryl Harrison, Laurel Lees, Curt Hildebrand, and David Stein (Panel composed of Visual Resources and Project Description Witnesses Identified in Pre-filed Testimony)	Visual Resources	Pre-filed written testimony and oral testimony at the Evidentiary Hearing (approximately 25 minutes)	See Response to 4 above.

6. Any objections that the Party may have to oral testimony provided by videoconference, including solutions for the Committee to be able to structure the hearing in a manner that can address the objections.

The Applicant does not have an objection to oral testimony provided by videoconference so long as the witnesses are asked to verify any reference materials that are being used during their testimony and verify that they are not being assisted or directed during their responses, for example by persons off camera or via electronic messaging devices.

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7. Subject areas upon which the Party desires to question the other Parties' expert witness(es), a summary of the scope of the questions (including questions regarding expert witness qualifications), the issue(s) to which the questions pertain, and the time desired to question each expert witness. NOTE: A Party who fails to provide, with specificity, the scope, relevance, and time for questioning other Parties' expert witness(es) risks preclusion from questioning on that subject area.

SUBJECT AREA	SUMMARY OF SCOPE OF QUESTIONS	ISSUE(S) TO WHICH THE QUESTIONS PERTAIN	TIME DESIRED TO QUESTION
Biological Resources	<u>CEC Staff Witnesses</u> Conclusions regarding impacts analyses, mitigation and related issues; see Response to 4 above and next column of this table.	Mitigation acreage; Treatment of Temporary Impacts; Mitigation Ratios; and Mitigation for Actual Impacts, Not Total Acreage Surveyed. (See Response to 4 above for details.) The Conditions of Certification that should be recommended by the Presiding Member.	45 minutes, depending on length of responses. Applicant will endeavor to shorten time, consistent with satisfying the burdens set for in statute and regulation.
Biological Resources	<u>Center for Biological Diversity Witnesses</u> Conclusions regarding impacts analyses, mitigation and related issues; see Response to 4 above and next column of this table.	The issues are set forth in the Applicant's Rebuttal Testimony (TN #: 265265): the absence of Western Joshua Trees Woodlands;; and CBD's critiques related to a Reservoir Management Plan	30 minutes, depending on length of responses. Applicant will endeavor to shorten time, consistent with satisfying the burdens set for in statute and regulation.
Visual Resources	<u>CEC Staff Witnesses</u> Conclusions regarding significance of impacts and differing methodologies; see Response to 4 above and next column of this table.	Methodology and Significance. (See Response to 4 above for details.) The Conditions of Certification that should be recommended by the Presiding Member.	15 minutes, depending on length of responses. Applicant will endeavor to shorten time, consistent with satisfying the burdens set for in statute and regulation.

- 8. A list identifying exhibits with transaction numbers (TN) that the Party intends to offer into evidence during the Evidentiary Hearing and the technical subject areas to which they apply (see above for further details on Exhibit Lists).**

The Applicant's Exhibit List is provided as Attachment A.

- 9. Proposals for post-hearing briefing deadlines, resolving scheduling conflicts, or other scheduling matters.**

The Applicant proposes the following briefing deadlines:

- Opening Briefs due seven (7) days after publication of evidentiary hearing transcripts;
- Reply Briefs due seven (7) days after submittal of Opening Briefs

Dated: August 11, 2025

Respectfully Submitted,

CLIMATE EDGE LAW GROUP



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ATTACHMENT A
GEM A-CAES, LLC's Exhibit List

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
GEM-A CAES LLC EXHIBIT LIST

EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1000	240751-23	Section 6_Alternatives_Gem Energy Storage Center	Alternatives
1001	241428	CONFIDENTIAL Appendix 3A, Interconnection Study Documents	Executive Summary; Project Description
1002	241503	Joint Response of Pecho and Gem Supporting NOI Exemption And Request For Commission Order	Alternatives; Executive Summary; Project Description
1003	242224	Joint Reply to CEC Staff's Response to Applicants' Filing Requesting Exemption from the NOI Process	Alternatives; Executive Summary; Project Description
1004	242776	Gem_Data Adequacy Master Response No 1	Alternatives; Executive Summary; Project Description
1005	242799	Att DA20-1 A-CAES Historical Operational Summary	Alternatives; Executive Summary; Project Description
1006	243543	Order and Final Commission Decision	Alternatives; Executive Summary; Project Description
1007	244331	Applicant's Notice of Project Name Change	Executive Summary; Project Description
1008	246751	Attachment DR95-1_C132-North-Q1782-TOT 1002-Gem-Appendix A	Executive Summary; Project Description, Transmission System Engineering
1009	246752	Attachment DR95-1_QC13PII-SCE-Northern-Q1782TOT 1002-Gem-Appendix A-Attachment 1	Executive Summary; Project Description, Transmission System Engineering
1010	247169	Attachment 3	Executive Summary; Project Description, Transmission System Engineering
1011	247170	Queue Cluster 13 Phase II – Attachment 1	Executive Summary; Project Description, Transmission System Engineering
1012	247171	Appendix A – Q1782	Executive Summary; Project Description, Transmission System Engineering
1013	247172	Queue Cluster 13 Phase 2 Attachment 2	Executive Summary; Project Description, Transmission System Engineering
1014	247173	Appendix H – SCD Results	Executive Summary; Project Description, Transmission System Engineering
1015	247174	Appendix G - Generation Sequencing Implementation (GSI)	Executive Summary; Project Description, Transmission System Engineering

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
GEM-A CAES LLC EXHIBIT LIST

EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1016	247175	SCE's Northern Hemisphere Import Nomogram Study	Executive Summary; Project Description, Transmission System Engineering
1017	247176	Area Report Appendix K	Executive Summary; Project Description, Transmission System Engineering
1018	247177	QC13 Phase 2 Area Report Appendix E	Executive Summary; Project Description, Transmission System Engineering
1019	247178	Queue Cluster 13 Phase II – Appendix B	Executive Summary; Project Description, Transmission System Engineering
1020	247179	Queue Cluster 13 Phase II – Appendix C	Executive Summary; Project Description, Transmission System Engineering
1021	247180	Queue Cluster 13 Phase II – Appendix D	Executive Summary; Project Description, Transmission System Engineering
1022	247181	Queue Cluster 13 Phase II – Appendix F	Executive Summary; Project Description, Transmission System Engineering
1023	247182	QC13 Phase II Appendix L - Subsynchronous Control Interaction Screening Assessment Report	Executive Summary; Project Description, Transmission System Engineering
1024	247183	Queue Cluster 13 Phase II Interconnection Study Report	Executive Summary; Project Description, Transmission System Engineering
1025	254774	Supplemental AFC Cover Letter and Data Adequacy Worksheets	All subject areas
1026	254799	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part VI	Geology, Paleontology, and Minerals
1027	254800	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part V	Geology, Paleontology, and Minerals
1028	254801	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part IV	Geology, Paleontology, and Minerals
1029	254802	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part III	Geology, Paleontology, and Minerals
1030	254803	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part II	Geology, Paleontology, and Minerals

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
GEM-A CAES LLC EXHIBIT LIST

EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1031	254804	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part I	Geology, Paleontology, and Minerals
1032	254805	Willow Rock Energy Storage Center SAFC, Volume 1, Part B	All subject areas
1033	254806	Willow Rock Energy Storage Center SAFC - Volume 1, Part A	All subject areas
1034	254807	Willow Rock Energy Storage Center SAFC Volume II- Appendix 56A-510A	Executive Summary; Project Description; Land Use, Agriculture, and Forestry; Noise and Vibration; Public Health; Socioeconomics and Environmental Justice
1035	254808	Willow Rock Energy Storage Center SAFC Volume II-Appendix 515A-Part II	Executive Summary; Project Description; Water Resources
1036	254809	Willow Rock Energy Storage Center SAFC Volume II-Appendix 515A-Part I	Executive Summary; Project Description; Water Resources
1037	254810	Willow Rock Energy Storage Center SAFC Volume II-Appendix 513A-514A	Visual Resources; Waste Management
1038	254811	Willow Rock Energy Storage Center SAFC Volume II-Appendix 52A-53B	Biological Resources; Cultural Resources
1039	254812	Willow Rock Energy Storage Center SAFC Volume II-Appendix 1A-51F	Air Quality, Climate Change, and Greenhouse Gas Emissions; Executive Summary; Project Description
1040	254813	Hi Res Figures V1 File 1 of 2	All subject areas
1041	254814	High Resolution Figures WRESC SAFC 2 of 2	All subject areas
1042	254815	2023 DESERT TORTOISE SURVEY	Biological Resources
1043	254816	WRESC BIOLOGICAL RESOURCES ASSESSMENT REPORT	Biological Resources
1044	254817	WRESC Burrowing Owl Focused Survey Report	Biological Resources
1045	254818	WRESC Mojave Ground Squirrel Report	Biological Resources
1046	254819	WRESC Jurisdictional Delineation	Water Resources
1047	254820	WRESC Western Joshua Tree Report 1 of 2	Biological Resources
1048	254821	WRESC Western Joshua Tree Report 2 of 2	Biological Resources

**WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
GEM-A CAES LLC EXHIBIT LIST**

EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1050	254828	Willow Rock Energy Storage Center SAFC Volume II - Appendix 511A - Part II	Geology, Paleontology, and Minerals
1051	254829	Willow Rock Energy Storage Center SAFC Volume II - Appendix 511A-Part I	Geology, Paleontology, and Minerals
1052	254897	Eastern Kern Air Pollution Control District (EKAPCD) Application	Air Quality, Climate Change, and Greenhouse Gas Emissions
1053	254951	Amended Cover Letter and Attestation of Completeness	All subject areas
1054	255273	EKAPCD Determination of Completeness	Air Quality, Climate Change, and Greenhouse Gas Emissions
1055	255594	EKAPCD Preliminary Determination of Compliance	Air Quality, Climate Change, and Greenhouse Gas Emissions
1056	256365	CONFIDENTIAL Appendix_Willow Rock Energy Storage Center Heat and Mass Balance Diagram	Executive Summary; Project Description
1057	256372	Eastern Kern Air Pollution Control District Notice of Final Determination of Compliance (FDOC)	Air Quality, Climate Change, and Greenhouse Gas Emissions
1058	256448	Appendix 1D Site-Related Property Owners and Relationship to Project Owner	Executive Summary; Project Description; Land Use, Agriculture, and Forestry
1059	256449	Appendix 1B Property Owner's Addresses and Map	Executive Summary; Project Description; Land Use, Agriculture, and Forestry
1060	256450	Appendix 5-8A Paleo Records Search Results - CONFIDENTIAL	Geology, Paleontology, and Minerals
1061	256485	CONFIDENTIAL_CNDDDB Forms	Biological Resources
1062	256486	CONFIDENTIAL_Swaainson Hawk	Biological Resources
1063	256487	CONFIDENTIAL_Crotch BB	Biological Resources
1064	256488	CONFIDENTIAL_Focused Plant Survey Report	Biological Resources
1065	256489	CONFIDENTIAL_C05_F5_2_4a_C_CNDDDBPlants	Biological Resources
1066	256490	CONFIDENTIAL_C06_F5_2_4b_C_CNDDDBWildlife	Biological Resources
1067	256491	CONFIDENTIAL_C08_F5_2_6a_C_ObservedSSPlants	Biological Resources
1068	256492	CONFIDENTIAL_C09_F5_2_6b_C_ObservedSSWildlife	Biological Resources

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
GEM-A CAES LLC EXHIBIT LIST

EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1069	256493	Confidential Cultural Resources Information	Cultural Resources
1070	256622	Willow Rock Data Adequacy Response	Executive Summary; Air Quality, Climate Change, and Greenhouse Gas Emissions; Biological Resources; Cultural Resources; Project Description; Public Health; Socioeconomics; Transportation; Transmission System Safety and Nuisance; Transmission System Design; Visual Resources; Water Resources
1071	256824	2022 Generator Interconnection Reassessment Report Northern Area Final Report	Executive Summary; Project Description, Transmission System Engineering
1072	256825	2022 Generator Reassessment Report	Executive Summary; Project Description, Transmission System Engineering
1073	256826	QC13 Phase 2 Study Report Attachment #2 Updated for 2022 Reassessment	Executive Summary; Project Description, Transmission System Engineering
1074	256860	Attachment ES-1 Property Owners List	Executive Summary; Project Description; Land Use, Agriculture, and Forestry
1075	256861	Attachment WA-6 Heat and Mass Balance (Block Flow Diagram)	Executive Summary; Project Description
1076	257516	Vertical Plume Velocity Assessment - Willow Rock Energy Storage Center	Executive Summary; Project Description
1077	257525	Summary of the Level of Service (LOS)-Based Traffic Study Methodology to be Implemented for the Willow Rock Energy Storage Proje	Transportation
1078	257622	Willow Rock Wetland Methodology	Biological Resources
1079	257813	Willow Rock Energy Storage Center Cultural Resources Phase II Testing Plan	Cultural Resources
1080	258308	Willow Rock Jurisdictional Waters Delineation Report	Water Resources
1081	258309	Willow Rock Desert Tortoise Survey 2024 Addendum	Biological Resources
1082	258310	Willow Rock Mohave Ground Squirrel Survey	Biological Resources

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1083	258311	Willows Rock Joshua Tree Census 2024 Addendum	Biological Resources
1084	258312	Willow Rock Swainson's Hawk Survey 2024 Addendum	Biological Resources
1085	258313	Willow Rock Sensitive Plant Survey 2024 Addendum	Biological Resources
1086	258314	Willow Rock Crotch's Bumble Bee Survey 2024 Addendum	Biological Resources
1087	258315	Willow Rock Burrowing Owl Survey 2024 Addendum	Biological Resources
1088	258316	Willow Rock Biological Resources Report 2024 Addendum	Biological Resources
1089	258518	Willow Rock Traffic Study Report	Transportation
1090	258681	Willow Rock Data Request Set 1 Response Report	Alternatives; Cultural Resources; Socioeconomics and Environmental Justice
1091	258868	31406639-000_01_04_FX-X- 04_Rev1_SoilsMap_CONFIDENTIAL_Mapbook	Biological Resources
1092	258869	31406639-000_01_05_FX-X- 05_Rev1_VegetationMap_CONFIDENTIAL_Mapbook	Biological Resources
1093	258870	31406639-000_01_06_FX-X- 06_Rev1_AllJurisdictionalDelin_CONFIDENTIAL_Mapbook	Biological Resources; Water Resources
1094	258871	31406639-000_01_08_FX-X- 08_Rev1_ProtectedConservedLands_CONFIDENTIAL_Mapbook	Biological Resources
1095	258872	31406639-000_01_09_FX-X- 09_Rev1_SpecialStatusPlants_CONFIDENTIAL_Mapbook	Biological Resources
1096	258873	31406639-000_01_10_FX-X- 10_Rev1_SpecialStatusWildlife_CONFIDENTIAL_Mapbook	Biological Resources
1097	258874	31406639-000_01_04_F03- 04_Rev1_BUOL_SurveyTransects_CONFIDENTIAL_Mapbook	Biological Resources
1098	258875	31406639-000_01_05_F03- 05_Rev1_BUOL_Occurances_CONFIDENTIAL_MapBook	Biological Resources
1099	258876	31406639-000_01_04_F08- 04_Rev1_CBBeeAndNectarSources_CONFIDENTIAL_Mapbook	Biological Resources
1100	258877	31406639-000_01_04_F07- 04_Rev1_JD_HydrologyMap_CONFIDENTIAL_Mapbook	Water Resources

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
GEM-A CAES LLC EXHIBIT LIST

EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1101	258878	31406639-000_01_05_F07-05_Rev1_JD_Vegetation_CONFIDENTIAL_Mapbook	Biological Resources
1102	258879	31406639-000_01_06_F07-06_Rev1_JD_NWI_Map_CONFIDENTIAL_Mapbook	Water Resources
1103	258880	31406639-000_01_07_F07-07_Rev1_JD_USDA_Soils_CONFIDENTIAL_Mapbook	Water Resources
1104	258881	31406639-000_01_08_F07-08_Rev1_JD_JurisdictionalDelin_CONFIDENTIAL_Mapbook	Water Resources
1105	258882	Hydrostor MGS Survey Report_Resource Agency Version	Biological Resources
1106	258883	31406639-000_01_04_F05-04_Rev1_SP_CNDDDB_CONFIDENTIAL_Mapbook	Biological Resources
1107	258884	31406639-000_01_05_F05-05_Rev1_SP_SensitivePlants_CONFIDENTIAL_Mapbook	Biological Resources
1108	258885	31406639-000_01_04_F02-04_Rev1_SH_ActiveNestLocations_CONFIDENTIAL_Mapbook	Biological Resources
1109	258886	31406639-000_01_05_F02-05_Rev1_SH_SWHAObsv_CONFIDENTIAL_Mapbook	Biological Resources
1110	258887	31406639-000_01_04_F06-04_Rev1_JT_Obvs_CONFIDENTIAL_Mapbook	Biological Resources
1111	259220	Willow Rock Data Request Set 2 Response	Air Quality, Climate Change, and Greenhouse Gas Emissions; Hazards, Hazardous Materials/Waste, and Wildfire; Land Use, Agriculture, and Forestry; Public Health; Transportation
1112	259338	Willow Rock CURE Data Request Set 1 Response	Project Description; Air Quality, Climate Change, and Greenhouse Gas Emissions; Biological Resources; Hazards, Hazardous Materials/Waste, and Wildfire; Geology, Paleontology, and Minerals
1113	259423	REDACTED_31406639-000_01_C05_F5_2-4a_C_Rev0_CNDDDBPlants	Biological Resources
1114	259424	REDACTED WRESC Swainson's Hawk Focused Survey	Biological Resources

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1115	259490	Attachment DR26-1 – Utility Pole Locations Map Book	Biological Resources; Transmission Line Safety and Nuisance, Transmission System Engineering
1116	259491	Attachment DR33-1 – Survey Area and Drainages Map Book	Water Resources
1117	259492	Attachment DR74-1 – 2023 and 2024 Swainson’s Hawk Survey Nest Locations Map Book	Biological Resources
1118	259493	Attachment DR75-1 – 2023 and 2024 Swainson’s Hawk Survey Hawk Locations Map Book	Biological Resources
1119	259675	Willow Rock Data Request Set 3 Response	Air Quality and Greenhouse Gas Emissions; Hazardous Materials, Hazardous Waste and Wildfire; Biological Resources; Water Resources; Transmission System Engineering; Facility Reliability; Worker Safety and Fire Protection
1120	259736	Willow Rock Data Request Set 4 Response	Biological Resources; Hazards, Hazardous Materials/Waste, and Wildfire; Worker Safety and Fire Protection
1121	260234	Attachment DR95-1_ITP_Confidential	Biological Resources
1122	260235	Attachment DR92-1 Draft Preliminary Conceptual WRESC WJT Relocation Plan_Confidential	Biological Resources
1123	260236	Attachment DR87-1_Confidential	Water Resources
1124	260237	Attachment DR88-1_Confidential	Biological Resources
1125	260238	Attachment DR89-1_Joshua Tree Census_Confidential	Biological Resources
1126	260239	Attachment DR82-1_Confidential	Biological Resources
1127	260240	Attachment DR84-1_Confidential	Biological Resources; Executive Summary; Project Description
1128	260241	Attachment DR85-1_Confidential	Biological Resources; Executive Summary; Project Description
1129	260242	Attachment DR96-1 Biological Surveys Shapefiles	Biological Resources

**WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
GEM-A CAES LLC EXHIBIT LIST**

EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1130	260243	Attachment DR67 Large Generator Interconnection Agreement	Executive Summary; Project Description
1131	260664	Willow Rock Energy Storage Center Cultural Resources Phase II Testing Plan	Cultural Resources
1132	260808	Willow Rock Data Request Set 5 Response Report	Air Quality, Climate Change, and Greenhouse Gas Emissions; Hazards, Hazardous Materials/Waste, and Wildfire; Transmission System Engineering; Worker Safety/ Fire Protection
1133	260809	Willow Rock Center for Biological Diversity Data Request Set 1 Response	Biological Resources; Water Resources
1134	261314	Willow Rock Data Request 6 Response	Biological Resources; Water Resources
1135	261315	Willow Rock CURE Data Request 2 Response	Alternatives; Air Quality, Climate Change, and Greenhouse Gas Emissions; Biological Resources; Facility Reliability; Geology, Paleontology, and Minerals; Noise and Vibration; Water Resources; Transmission System Engineering;
1136	261500	Willow Rock CEC Data Request Set 6 Attachment DR121-1	Water Resources
1137	261511	Willow Rock CEC Data Request Set 6 Attachment DR123-1 Cover Sheet	Water Resources
1138	261515	Willow Rock CEC Data Request Set 6 Attachment DR124-1	Land Use, Agriculture, and Forestry
1139	261516	Willow Rock CEC Data Request Set 6 Attachment DR125-1	Biological Resources
1140	261563	Willow Rock Updated SAFC Project Description - Section 2 Redline	Executive Summary; Project Description
1141	261564	Willow Rock Updated SAFC Introduction - Section 1 Redline	Executive Summary; Project Description
1142	261844	Attachment 1261 – Confidential Mapbook Figure 4	Biological Resources
1143	261991	Willow Rock Jurisdictional Waters Delineation Report Appendix B	Water Resources
1144	261992	Willow Rock Jurisdictional Waters Delineation Report Appendix A Part 3	Water Resources

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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1145	261993	Willow Rock Jurisdictional Waters Delineation Report Appendix A Part 2	Water Resources
1146	261994	Willow Rock Jurisdictional Waters Delineation Report Appendix A Part 1	Water Resources
1147	261995	Willow Rock Jurisdictional Waters Delineation Report Text	Water Resources
1148	262180	Follow-up Responses on Biological and Water Resources, Drilling Cuttings, and DSOD Info for Willow Rock Energy Storage Center	Biological Resources; Water Resources
1149	262196	Willow Rock Incidental Take Permit	Biological Resources
1150	262243	Willow Rock Jurisdictional Drainages Additional Information Attachment	Water Resources
1151	262244	Willow Rock Jurisdictional Drainages Additional Information Text	Water Resources
1152	262295	Willow Rock NOI Application Rev	Water Resources
1153	262349	Consolidated Email Responses to CEC Staff on Lahontan's February 26, 2025 Request for Additional Information (TN # 261932)	Air Quality, Climate Change, and Greenhouse Gas Emissions; Executive Summary; Project Description; Transportation
1154	262705	Phase II Cultural Resources Testing and Evaluation for WRESC	Cultural Resources
1155	264316	Willow Rock Preliminary Staff Assessment Comments Report Comments - Willow Rock Preliminary Staff Assessment Comments Report	All subject areas
1156	265067	Willow Rock Data Adequacy Response, Attachment PD-3	Project Description
1157	265068	Willow Rock Data Adequacy Response, Attachment PD-2	Project Description
1158	265069	Willow Rock Data Adequacy Response, Attachment PD-1	Project Description
1159	265071	Willow Rock Data Adequacy Response, Attachment PD-4, Part 1	Project Description
1160	265074	Willow Rock Data Adequacy Response, Attachment PD-4, Part 2	Project Description
1161	265073	Willow Rock Data Adequacy Response, Attachment PD-5	Project Description
1162	265072	Willow Rock Data Adequacy Response, Attachment TRAN-1	Transportation
1163	265075	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 7_BaselineKOP6a	Visual Resources

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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1164	265076	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 6_BaselineKOP6	Visual Resources
1165	265077	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 5_BaselineKOP5	Visual Resources
1166	265078	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 4_BaselineKOP4	Visual Resources
1167	265079	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 3_BaselineKOP3	Visual Resources
1168	265080	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 2_BaselineKOP2	Visual Resources
1169	265081	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 1_Baseline Pano	Visual Resources
1170	265082	Willow Rock Data Adequacy Response, Attachment TSD-1	Transmission System Engineering
1171	265083	Willow Rock Data Adequacy Response, Attachment TSSN-1	Transmission Line Safety and Nuisance
1172	265085	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 8_BaselineKOP7	Visual Resources
1173	265087	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 16_Update KOP6A	Visual Resources
1174	265088	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 15_Update KOP6	Visual Resources
1175	265089	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 14_Update KOP5	Visual Resources
1176	265090	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 13_Update KOP4	Visual Resources
1177	265091	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 12_Update KOP3	Visual Resources
1178	265092	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 11_Update KOP3	Visual Resources
1179	265093	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 10_Update KOP2	Visual Resources

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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1180	265094	Willow Rock Data Adequacy Response, Attachment VIS-2_Part 9_Update KOP1	Visual Resources
1181	265095	Willow Rock Data Request Set 2 Response, Attachment DR35-1 Part 2	Executive Summary; Project Description; Transmission System Engineering;Transmission Line Safety and Nuisance
1182	265096	Willow Rock Data Request Set 2 Response, Attachment DR35-1 Part 1	Executive Summary; Project Description; Transmission System Engineering;Transmission Line Safety and Nuisance
1183	265097	Willow Rock Data Request Set 3 Response, Attachment DR54-2	Executive Summary; Project Description; Hazards, Hazardous Materials/Waste, and Wildfire
1184	265098	Willow Rock Data Request Set 3 Response, Attachment DR54-1	Executive Summary; Project Description; Hazards, Hazardous Materials/Waste, and Wildfire
1185	265099	Willow Rock CBD Data Request Set 1 Response, Attachment DR5-1	Biological Resources
1186	265100	Willow Rock Data Adequacy Response, Attachment VIS-2_Part1 9_Figure Set	Visual Resources
1187	265101	Willow Rock Data Adequacy Response, Attachment VIS-2_Part18_Update KOP7	Visual Resources
1188	265102	Willow Rock Data Adequacy Response, Attachment VIS-2_Part17_Update KOP7 Berm	Visual Resources
1189	265103	Willow Rock Data Request Set 2 Response, Attachment DR35-1_Part 3	Project Description, Transmission System Engineering, Transmission Line Safety and Nuisance
1190	265104	Willow Rock Data Request Set 2 Response, Attachment DR35-1_Part 4	Project Description, Transmission System Engineering, Transmission Line Safety and Nuisance

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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1191	265105	Willow Rock Data Request Set 1 Response Report, Attachment DR2-5	Project Description, Transmission System Engineering, Transmission Line Safety and Nuisance
1192	265106	Willow Rock CURE Data Request 2 Response Attachment DR168-1	Geology, Paleontology, and Minerals
1193	265107	Willow Rock CURE Data Request 2 Response Attachment DR144-1	Geology, Paleontology, and Minerals
1194	265108	Willow Rock CURE Data Request 2 Response, Attachment DR136-1_Part 1	Geology, Paleontology, and Minerals
1195	265109	Willow Rock CURE Data Request 2 Response, Attachment DR136-1_Part 2_Appendix A-1	Geology, Paleontology, and Minerals
1196	265110	Willow Rock CURE Data Request 2 Response, Attachment DR136-1_Part 2_Appendix A-2	Geology, Paleontology, and Minerals
1197	265111	Willow Rock CURE Data Request 2 Response, Attachment DR136-1_Part 3_Appendix B-1	Geology, Paleontology, and Minerals
1198	265112	Willow Rock CURE Data Request 2 Response, Attachment DR136-1_Part 3_Appendix B-2	Geology, Paleontology, and Minerals
1199	265113	Willow Rock CURE Data Request 2 Response, Attachment DR136-1_Part 5_Appendix D	Geology, Paleontology, and Minerals
1200	265114	Willow Rock CURE Data Request 2 Response, Attachment DR136-1_Part 6_Appendix E	Geology, Paleontology, and Minerals
1201	265115	Willow Rock CURE Data Request Set 1 Response, Attachment DR8-1	Biological Resources
1202	265116	Willow Rock CURE Data Request Set 1 Response, Attachment DR11-1	Biological Resources
1203	265117	Willow Rock CURE Data Request Set 1 Response, Attachment DR42-1	Biological Resources
1204	265118	Willow Rock CURE Data Request Set 1 Response, Attachment DR46-1	Biological Resources
1205	265119	Willow Rock CURE Data Request Set 1 Response, Attachment DR47-1	Biological Resources

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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1206	265120	Willow Rock CURE Data Request Set 1 Response, Attachment DR66-1	Biological Resources
1207	265121	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-1_Part 1	Geology, Paleontology, and Minerals
1208	265122	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-1_Part 2	Geology, Paleontology, and Minerals
1209	265123	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-1_Part 3	Geology, Paleontology, and Minerals
1210	265124	Willow Rock Data Request Set 1 Response Report, Attachment DR2-6_Text	Project Description, Transmission System Engineering, Transmission Line Safety and Nuisance
1211	265125	Willow Rock Data Request Set 1 Response Report, Attachment DR2-6_Appendices	Project Description, Transmission System Engineering, Transmission Line Safety and Nuisance
1212	265126	Willow Rock Data Request 6 Response, Attachment DR126-1	Biological Resources
1213	265129	Repeated Application for Confidential Designation_Data Adequacy Response BIO-2pdf	Biological Resources
1214	265130	Repeated Application for Confidential Designation_WRESC Confidential Appendix 53B_Appendix E Vol 2	Cultural Resources
1215	265131	250730_Repeated Application for Confidential Designation_WRESC Confidential Appendix 53B_Appendix E Vol 1	Cultural Resources
1216	265132	250729_Repeated Application for Confidential Designation_WRESC Confidential Appendix 53B	Cultural Resources
1217	265136	Repeated Application for Confidential Designation_Phase II Cultural Resources Testing and Evaluation Report	Cultural Resources
1218	265141	Willow Rock Data Request 4 Response, Attachment DR102-5	Project Description, Transmission System Engineering, Transmission Line Safety and Nuisance
1219	265149	Willow Rock CURE Data Request 2 Response, Attachment DR143-1_Part1	Geology, Paleontology, and Minerals

**WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1220	265150	Willow Rock CURE Data Request 2 Response, Attachment DR143-1_Part3	Geology, Paleontology, and Minerals
1221	265151	Willow Rock CURE Data Request 2 Response, Attachment DR143-1_Part2	Geology, Paleontology, and Minerals
1222	265152	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part7	Geology, Paleontology, and Minerals
1223	265153	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part6	Geology, Paleontology, and Minerals
1224	265154	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part5	Geology, Paleontology, and Minerals
1225	265155	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part4	Geology, Paleontology, and Minerals
1226	265156	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part3	Geology, Paleontology, and Minerals
1227	265157	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part2	Geology, Paleontology, and Minerals
1228	265158	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part1	Geology, Paleontology, and Minerals
1229	265159	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part11	Geology, Paleontology, and Minerals
1230	265160	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part10	Geology, Paleontology, and Minerals
1231	265161	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part9	Geology, Paleontology, and Minerals
1232	265162	Willow Rock CURE Data Request Set 1 Response, Attachment DR103-2_Part8	Geology, Paleontology, and Minerals
1233	265170	Opening Testimony and Evidence_07302025	All subject areas
1234	265265	Rebuttal Testimony	Biological Resources
1235	265357	Willow Rock Data Adequacy Response, Attachment BIO-2_Part 1_Confidential	Biological Resources

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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1236	265358	Willow Rock Data Adequacy Response, Attachment BIO-2_Part 2_Confidential	Biological Resources
1237	265359	Willow Rock Data Adequacy Response, Attachment BIO-2_Part 3_Confidential	Biological Resources
1238	265341	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA	Cultural Resources
1239	265342	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix A_Part1	Cultural Resources
1240	265343	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix A_Part2	Cultural Resources
1241	265344	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix B	Cultural Resources
1242	265345	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix C	Cultural Resources
1243	265346	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part1	Cultural Resources
1244	265347	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part2	Cultural Resources
1245	265348	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part3	Cultural Resources
1246	265349	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part4	Cultural Resources
1247	265350	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part5	Cultural Resources
1248	265351	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part6	Cultural Resources
1249	265352	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part7	Cultural Resources
1250	265353	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part8	Cultural Resources

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1251	265354	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part9	Cultural Resources
1252	265355	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part10	Cultural Resources
1253	265356	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix D DPRs_Part11	Cultural Resources
1254	265317	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part8	Cultural Resources
1255	265318	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part9	Cultural Resources
1256	265319	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part10	Cultural Resources
1257	265320	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part11	Cultural Resources
1258	265321	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part12	Cultural Resources
1259	265322	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part13	Cultural Resources
1260	265323	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part14	Cultural Resources
1261	265324	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part15	Cultural Resources
1262	265325	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part16	Cultural Resources
1263	265326	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part17	Cultural Resources
1264	265327	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part18	Cultural Resources
1265	265328	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part19	Cultural Resources

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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1266	265329	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part20	Cultural Resources
1267	265330	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part21	Cultural Resources
1268	265331	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part22	Cultural Resources
1269	265332	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part23	Cultural Resources
1270	265333	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part24	Cultural Resources
1271	265334	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part1	Cultural Resources
1272	265335	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part2	Cultural Resources
1273	265336	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part3	Cultural Resources
1274	265337	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part4	Cultural Resources
1275	265338	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part5	Cultural Resources
1276	265339	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part6	Cultural Resources
1277	265340	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol1_Part7	Cultural Resources
1278	265278	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part1	Cultural Resources
1279	265279	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part2	Cultural Resources
1280	265280	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part3	Cultural Resources

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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1281	265281	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part4	Cultural Resources
1282	265282	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part5	Cultural Resources
1283	265283	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part6	Cultural Resources
1284	265284	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part7	Cultural Resources
1285	265285	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part8	Cultural Resources
1286	265286	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part9	Cultural Resources
1287	265287	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part10	Cultural Resources
1288	265288	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part11	Cultural Resources
1289	265289	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part12	Cultural Resources
1290	265290	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part13	Cultural Resources
1291	265291	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part14	Cultural Resources
1292	265292	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part15	Cultural Resources
1293	265293	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part16	Cultural Resources
1294	265294	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part17	Cultural Resources
1295	265295	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part18	Cultural Resources

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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1296	265296	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part19	Cultural Resources
1297	265297	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part20	Cultural Resources
1298	265298	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part21	Cultural Resources
1299	265299	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part22	Cultural Resources
1300	265300	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part23	Cultural Resources
1301	265301	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part24	Cultural Resources
1302	265302	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part25	Cultural Resources
1303	265303	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part26	Cultural Resources
1304	265304	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part27	Cultural Resources
1305	265305	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part28	Cultural Resources
1306	265306	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part29	Cultural Resources
1307	265307	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part30	Cultural Resources
1308	265308	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part31	Cultural Resources
1309	265309	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part32	Cultural Resources
1310	265310	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part33	Cultural Resources

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02)
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EXHIBIT	TN	DOCUMENT TITLE	SUBJECT AREA
1311	265311	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part34	Cultural Resources
1312	265312	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part35	Cultural Resources
1313	265313	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part36	Cultural Resources
1314	265314	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part37	Cultural Resources
1315	265315	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part38	Cultural Resources
1316	265316	Willow Rock Energy Storage Center Supplemental AFC Volume II - Confidential Appendix 53B_CRA Appendix E_Vol2_Part39	Cultural Resources
1317	265272	Phase II Cultural Resources Testing and Evaluation for WRESC_Part1	Cultural Resources
1318	265273	Phase II Cultural Resources Testing and Evaluation for WRESC_Part2	Cultural Resources
1319	265274	Phase II Cultural Resources Testing and Evaluation for WRESC_Part3	Cultural Resources
1320	265275	Phase II Cultural Resources Testing and Evaluation for WRESC_Part4	Cultural Resources
1321	265276	Phase II Cultural Resources Testing and Evaluation for WRESC_Part5	Cultural Resources
1322	265277	Phase II Cultural Resources Testing and Evaluation for WRESC_Part6	Cultural Resources
1323	265375	Willow Rock- Joint Statement of GEM A-CAES and CURE	All subject areas