

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	265530
<b>Document Title:</b>	Center for Biological Diversity Prehearing Conference Statement with Exhibit List
<b>Description:</b>	N/A
<b>Filer:</b>	Center for Biological Diversity
<b>Organization:</b>	Center for Biological Diversity
<b>Submitter Role:</b>	Intervenor Representative
<b>Submission Date:</b>	8/11/2025 4:59:37 PM
<b>Docketed Date:</b>	8/11/2025

**STATE OF CALIFORNIA**

**State Energy Resources Conservation and  
Development Commission**

In the Matter of:

WILLOW ROCK ENERGY  
STORAGE CENTER

**Docket No. 21-AFC-02**

**INTERVENOR CENTER FOR BIOLOGICAL DIVERSITY  
PREHEARING CONFERENCE STATEMENT  
FOR WILLOW ROCK ENERGY STORAGE CENTER**

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**INTERVENOR CENTER FOR BIOLOGICAL DIVERSITY  
PREHEARING CONFERENCE STATEMENT  
FOR WILLOW ROCK ENERGY STORAGE CENTER**

In accordance with the Committee's July 17, 2025, Notice of Prehearing Conference and Evidentiary Hearing, Fifth Revised Scheduling Order, and Further Orders (TN 264853), Intervenor Center for Biological Diversity (the "Center") respectfully submits this Prehearing Conference Statement and Exhibit List for the Willow Rock Energy Storage Center Project ("Willow Rock Project"). This is the Center's Prehearing Conference Statement.

**I. Subject areas that are complete and ready to proceed to Evidentiary Hearing**

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

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

The Center proposes to introduce written expert witness testimony, in the form of the Center's Opening and Rebuttal testimony for Biological Resources (TN 265163 – 66 & TN 265263).

**III. 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 CEC Staff's Final Staff Assessment (TN 264843) are complete.

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

The Center believes the following subject area may be in dispute:

Biological Resources: The Center remains concerned that the mitigation measures in the conditions of certification fail to address impacts to Joshua tree woodlands on the Project site. The Center is also concerned that the applicant has not performed complete surveys of all project areas, which must be done prior to issuing of an incidental take permit under the Western Joshua Tree Conservation Act.

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- V. 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.

The Center will make available Ileene Anderson who will provide testimony, via videoconference, regarding the adequacy of surveys, avoidance measures, and minimization and mitigation strategies for impacts to western Joshua trees and Joshua tree woodlands. Ms. Anderson's qualifications are appended to her Opening Testimony, TN 265163. The Center anticipates needing no more than 10 minutes to present the testimony of Ileene Anderson.

- VI. 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 Center has no objections to oral testimony provided through videoconference.

- VII. 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.

The Center reserves the right to question the Biological Resources panel on matters addressed in its expert's opening and rebuttal testimony, including issues related to surveys, avoidance, minimization, and mitigation for western Joshua trees and Joshua tree woodlands. The Center anticipates needing no more than 10 minutes for questions on these topics.

- VIII. 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).

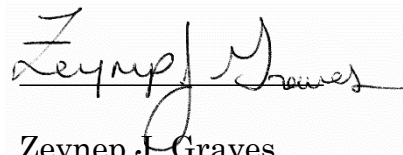
Proposed Exhibit #	TN	Document Title	Subject Area
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4000	265163	Ileene Anderson Opening Testimony	Biological Resources
4001	265263	Ileene Anderson Rebuttal Testimony	Biological Resources

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

The Center has no issues with the closing briefing schedule outlined in the Committee's July 17, 2025, Notice of Prehearing Conference and Evidentiary Hearing, Fifth Revised Scheduling Order, and Further Orders (TN 264853).

Respectfully,



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