

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	265531
<b>Document Title:</b>	Willow Rock Energy Storage - CURE Preconference Hearing Statement
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<b>Organization:</b>	California Unions for Reliable Energy
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**STATE OF CALIFORNIA**

**State Energy Resources Conservation  
and Development Commission**

In the Matter of:

**WILLOW ROCK ENERGY STORAGE  
CENTER**

Docket No. 21-AFC-02

**CALIFORNIA UNIONS FOR RELIABLE ENERGY'S  
PRECONFERENCE HEARING STATEMENT**

August 11, 2025

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California Unions for Reliable Energy (“CURE”) submits this Preconference Hearing Statement pursuant to the Committee’s Notice of Prehearing Conference and Evidentiary Hearing, Fifth Revised Scheduling Order, and Further Orders, filed on July 17, 2025, which orders each party to file a Preconference Hearing Statement.<sup>1</sup>

On August 7, 2025, CURE and Applicant GEM A-CAES LLC filed a Joint Statement<sup>2</sup> reporting that they had reached an agreement to resolve environmental issues raised by CURE concerning GEM A-CAES LLC’s proposed Willow Rock Energy Storage Center project (“Project”). Accordingly, CURE will not introduce testimony or evidence at the Evidentiary hearing.

Dated: August 11, 2025

Respectfully submitted,

/s/ Richard Franco

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<sup>1</sup> TN 264853.

<sup>2</sup> TN 265375.