

DOCKETED	
Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	265694
Document Title:	Applicant's Response to Order After Prehearing Conference and Further Instructions for Evidentiary Hearing
Description:	Applicant's Response to Order After Prehearing Conference and Further Instructions for Evidentiary Hearing
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Organization:	Climate Edge Law Group
Submitter Role:	Applicant Representative
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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 *Order After Prehearing Conference and Further Instructions for Evidentiary Hearing* issued on August 18, 2025 (“August 18th Order”)¹, GEM A-CAES LLC (the “Applicant”) submits this list of expert witnesses who will be available to testify at the evidentiary hearings scheduled for August 21 and 22, 2025 on behalf of the Willow Rock Energy Storage Center (the “WRESC”).

Applicant’s Witness List			
Topic/ Subtopic	Witness Name, Title, Organization	Estimated Time of Opening Statement	In-Person/ remote
Biological Resources			
Biological Resources- All subtopics	Kate Moss Principal Biologist WSP Canada Inc.	10 minutes	In-Person
Biological Resources- All subtopics	Scott Crawford Biology Group Manager WSP USA Inc.	10 minutes	In-Person
Biological Resources- All subtopics	David Stein, PE Senior Vice President WSP USA Inc.	---	In-Person
Biological Resources- Avoidance, minimization, and mitigation measures	Laurel Lees Senior Director, Development Permitting- North America Hydrostor Inc.	---	In-Person
Biological Resources- Avoidance and minimization measures for gen-tie construction	Cody Niehus Development Manager Hydrostor Inc.	---	In-Person

¹ TN#: 265661.

Applicant's Witness List			
Topic/ Subtopic	Witness Name, Title, Organization	Estimated Time of Opening Statement	In-Person/ remote
Water Resources: Design, Construction, and Operation of Hydrostatically Compensating Reservoir/DWR-DSOD Consultation and Delegation/Fees			
Water Resources- General	George Wegmann, PG, CHG Vice President WSP USA Inc.	---	In-Person
Water Resources- WATER-5 & WATER-6	Laurel Lees Senior Director, Development Permitting- North America Hydrostor Inc.	5 minutes	In-Person
Water Resources- WATER-5 & WATER-6	Curt Hildebrand, PE Senior Vice President- Commercial Affairs Hydrostor Inc.	---	In-Person
Water Resources- LORS related to the Applicant's proposed design, construction, and operation of the hydrostatically compensating reservoir	Victor Grille, PE Project Director Hydrostor Inc.	5 minutes	In-Person
Water Resources- LORS related to the Applicant's proposed design, construction, and operation of the hydrostatically compensating reservoir	Lucas Thexton Engineering Manager Hydrostor Inc.	---	Remote
Water Resources- LORS related to the Applicant's proposed design, construction, and operation of the hydrostatically compensating reservoir	Samrat Mohanty, PhD, PE ² VP of Mining and Geotechnical Hydrostor Inc.	---	Remote
Cavern Construction: Facility Design, Facility Reliability, Geology, Worker Safety & Public Health			
Facility Design, Facility Reliability, Public Health, Worker Safety—All subtopics, including WORKER SAFETY-7 and PH-1	Victor Grille, PE Project Director Hydrostor Inc.	10 minutes	In-Person

² The qualifications of Mr. Mohanty are provided as Attachment A to this response.

Applicant's Witness List			
Topic/ Subtopic	Witness Name, Title, Organization	Estimated Time of Opening Statement	In-Person/ remote
Facility Design, Facility Reliability, Geology—All subtopics, including GEO-3 and WORKER SAFETY-5	Lucas Thexton Engineering Manager Hydrostor Inc.	---	Remote
Facility Design, Facility Reliability, Geology—All subtopics, including GEO-3 and WORKER SAFETY-5	Samrat Mohanty, PhD, PE VP of Mining and Geotechnical Hydrostor Inc.	---	Remote
Facility Design, Facility Reliability, Public Health—All subtopics, including WORKER SAFETY-7, and PH-1	Curt Hildebrand, PE Senior Vice President- Commercial Affairs Hydrostor Inc.	20 minutes for Facility Design, Facility Reliability	In-Person
Facility Design, Facility Reliability, Public Health—All subtopics, WORKER SAFETY-7 and PH-1	David Stein, PE Senior Vice President WSP USA Inc.	---	In-Person
Geology—All subtopics, including GEO-1, GEO-2	George Wegmann, PG, CHG Vice President WSP USA Inc.	---	In-Person
Worker Safety—All subtopics, including GEO-3, WORKER SAFETY-5, WORKER SAFETY-7 and PH-1	Jesse Steele Assistant Vice President Environmental Health and Safety WSP USA Inc.	10 minutes for Worker Safety	In-Person

Dated: August 19, 2025

Respectfully Submitted,

CLIMATE EDGE LAW GROUP

By: _____/s/_____
 Jeffery D. Harris
 Samantha G. Neumyer
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Attorneys for Applicant

ATTACHMENT A

Resume of Samrat Mohanty, PhD, PE

SAMRAT MOHANTY, PhD, PE

DENVER, COLORADO

SAMRAT.MOHANTY@HYDROSTOR.CA

QUALIFICATIONS SUMMARY

25 Years of experience in underground space (cavern and mine) design, analysis and construction oversight in diverse geologies and across four continents. Uniquely qualified in rock mechanics, civil geotechnics, hydrogeology (porous media and rock mass) and advanced numerical modeling.

EXPERTISE INCLUDES:

- Underground Cavern & Tunnel Design
- Underground Mine Design
- Dam/Embankment/Tailing Design
- Groundwater Flow Analysis
- Cavern Product Leakage Analysis
- Seismic & Slope Stability Analysis
- Technical Advisor & Project Manager
- Due Diligence & Permitting

RELEVANT PROFESSIONAL EXPERIENCE

Hydrostor (March 2024 – Current)

Vice President, Geotechnical & Mining (Global)

Leading underground works (cavern, shafts & ancillary structures) and reservoir design for the Willow Rock (California) and Silver City (Australia) ACAES projects. Managing multi-disciplinary technical teams (external and internal) and contractors for design delivery and optimizations. Providing geotechnical and geologic advisory to multiple emerging development projects in multiple international jurisdictions.

Cargill Salt, North America (April 2021 – March 2024)

Subject Matter Expert, Geotechnical & Mining

Provided mining, geotechnical and geoenvironmental advisory and planning to three underground salt mines, six underground salt solution mining and four salt evaporation mining facilities. Managed external consultants and contractors, and internal technical teams. Provided permitting support to operations for local, state and federal regulatory agencies.

Agapito Associates, Inc., Golden, Colorado (May 2008 – April 2021)

Senior Associate, Geotechnical & Mining

Led multi-disciplinary teams on design and analysis efforts for multiple underground storage caverns in diverse geological regimes and for varied product storages globally. Performed numerical modeling analysis for geotechnical stability of structures, groundwater flow response to underground structures and leakage potential of underground storage caverns, with emphasis on design optimization, ground support and risk mitigation. Led design and analysis efforts for multiple underground mine & tunnel as well as surface mining projects, with emphasis on rock mechanics and ground control. Led design and analysis efforts for multiple surface dams, embankments and tailing facilities. Performed due diligence, feasibility studies and forensic analysis for the range of above-

mentioned projects. Managed engineers, geologists, subconsultants, field exploration programs and laboratory services.

URS Corporation (now AECOM), NM & CA (April 2007 – May 2008)

Mining Engineer

Performed mine planning and reclamation planning. Led field subsurface exploration and construction programs. Performed dam and embankment stability analysis.

Southern Illinois University Carbondale, IL (May 2001 – March 2008)

Researcher

Led a multi-disciplinary team of scientists to investigate coal tailings contaminants on behalf of Illinois EPA and develop best disposal practices. Provided geotechnical, mine planning and geoenvironmental advisory to multiple underground mines in the Midwestern US.

Tata Steel (July 2000 – May 2001)

Mining Engineer

Oversaw mine planning and mineral extraction in four underground and surface mines.

EDUCATION AND LICENSES

Southern Illinois University Carbondale, IL
PhD, Engineering Mechanics - 2007

Southern Illinois University Carbondale, IL
MS, Mining and Civil Engineering - 2003

Indian School of Mines, India
BTech, Mining Engineering - 2000

Professional Engineer, Colorado
PE.0046547 (licensed since 2012)