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WILLOW ROCK
ENERGY STORAGE



June 2026

Monthly Compliance Report #4

Willow Rock Energy Storage Center 21-AFC-02C

Submitted by GEM A-CAES LLC
Prepared by Strachan Consulting, LLC

Monthly Compliance Report #4

1. Introduction

The Willow Rock Energy Storage Center (“WRESC” or the “Project”) (21-AFC-02C) will be a nominal 520-megawatt (MW) gross (500 MW net) and 4,160 megawatt-hour (MWh) gross (4,000 MWh net) facility using Hydrostor, Inc.’s (“Hydrostor”) proprietary Advanced Compressed Air Energy Storage (“A-CAES”) technology. The Project Owner and the holder of the Commission’s Certification is GEM A-CAES LLC (“GEM LLC” or the “Project Owner”).

Located in unincorporated Kern County (“County”), approximately 4 miles north of Rosamond, California, the energy stored at the WRESC will be delivered to Southern California Edison’s (“SCE’s”) Whirlwind Substation, via a new approximately 19-mile, 230 kilovolt (kV) generation-tie (“gen-tie”) line. Once in operation, the WRESC will be capable of operating 24 hours per day, 7 days per week, and 365 days per year, with an approximately 50-year lifespan.

Pursuant to the Conditions of Certification (“CoCs”) identified in the California Energy Commission’s (“CEC”) Final Decision for the Project, this Monthly Compliance Report (“MCR”) has been prepared pursuant to CoC COM-6. The requirements for the MCR content specified in the CoC are included in Section 2, below. This is the fourth MCR for the WRESC Project. It covers Project activities from May 1 – 31, 2026.

2. Summary of Monthly Compliance Report

This MCR includes the information required by COM-6, which is listed below:

- A summary of the current Project status, a revised/updated schedule if there are significant delays, and an explanation of any significant changes to the schedule (Sections 3 and 4);
- Documents required by specific CoCs to be submitted along with the MCR. Each of these items shall be identified in the transmittal letter, as well as the Conditions they satisfy, and submitted as attachments to the MCR (Section 5);
- A compliance matrix showing the status of all CoCs related to the pre-construction phase of the Project (Attachment A)
- A list of CoCs that have been satisfied during the reporting period, and a description or reference to the actions that satisfied the condition (Section 5);
- A list of any submittal deadlines that were missed, accompanied by an explanation and an estimate of when the information will be provided (Section 6);
- A cumulative listing of any approved changes to CoCs or Verification language (Section 7 and Attachment B);
- A listing of any filings submitted to, and permits issued by, other governmental agencies during the month (Section 8);

- A projection of Project compliance activities scheduled during the next two months; the Project Owner will notify the CPM as soon as any changes are made to the Project construction schedule that would affect compliance with CoCs (Section 9);
- A listing of the month's additions to the on-site compliance file (Section 10); and
- A listing of incidents, complaints, notices of violation, official warnings, and citations received during the month; a description of the actions taken to date to resolve the issues; and the status of any unresolved actions noted in the previous MCRs (Section 11).

3. Summary of Current Project Status

GEM LLC has entered into agreements with Hatch and Cementation to design and construct the WRESC. Hatch is leading the design and execution of the aboveground Project components. Cementation is the contractor responsible for the design and construction of the Project's below ground components. The contractor for the Project transmission line, a later stage construction activity, will be selected consistent with the Project's schedule of construction activities.

The Project is in the pre-construction compliance phase, with GEM LLC and its team working carefully to conform design requirements to all applicable Laws, Ordinances, Regulations, and Standards ("LORS") to ensure all pre-construction compliance obligations set forth in the CoCs are met so that a Notice to Proceed, can be issued by the CEC Compliance Project Manager ("CPM"). Preconstruction biological surveys have been conducted for burrowing owl, Swainson's hawk, special status plants, special status reptiles, and desert tortoise. The CEC CPM team including biological resources staff conducted site visits the week of May 4th during which the scope of the surveys and plans such as Western Joshua Tree Relocation Plan were discussed.

Given the time required to construct the Project's cavern, certain Project activities within the lower half of the site must begin before construction of the remainder of the site. Activities in this area constitute "Early Works" site activities and are identified in Table 1, Key Events Schedule. Construction activities on the remainder of the site are identified as "Later Works" site activities. The locations of the Early Works construction activities are shown on Figure 1, below.

Table 2 below, "Submitted Compliance Documents," contains more details on the compliance documents submitted to date. Engineering activities during the reporting period focused on the Early Works scope. Hatch continued development of detailed engineering for the Early Works, and the next Delegate Chief Building Official ("DCBO") submittal packages will be submitted as they become available for review between May and early June 2026. Specifically, the following engineering activities occurred during the reporting period:

- Finalized selection of the Front-End Engineering Design ("FEED") finished grading design to optimize required fill volumes for topside and Early Works areas.
- Finalized layout for the purposes of Early Works. Associated calculations and modelling progressing in earnest with goal to finalize in June. Drawing production to begin in parallel for the Early Works scope.
- Progressed stormwater management design, including hydrologic assessment, external open-channel sizing, Dawn Road culvert sizing, and stormwater pond sizing.
- Dawn Road drawings started.

- Updated the Dawn Road drawings with the recommended design criteria including traffic index.
- Progressed development of the remaining early works related civil specifications.
- Progressed development of the Early Works drainage erosion and sediment control plan (DESCP).
- Developed analysis and provided recommendations for infiltration rate to be used for the stormwater management ponds.
- Construction Temporary Power, Power Switchgear bids received and evaluation started.

Request for Limited Notice to Proceed. On May 1, 2026, GEM LLC submitted a request for Limited Notice to Proceed for site preparation activities, specifically relocation of Western Joshua Trees and site trash removal. In response to the request, CEC staff identified approximately 40 Conditions of Certification requiring compliance before the Limited Notice to Proceed could be issued. Given the number of conditions listed, GEM LLC withdrew its request on May 18, 2026.

4. Key Events Schedule

A Key Events Schedule outlining the major milestones and activities associated with the Project is presented in Table 1. This Key Events Schedule is reflected in the latest Pre-Construction Compliance Matrix (see Section 5, below).

Table 1: Key Events Schedule

| Event Description | Date |
|--|---------------|
| Finalize Site Control of All Parcels | March 2025 |
| Project Certification | December 2025 |
| Start of Commercial Operation | July 2030 |
| SITE ASSESSMENT & PRE-CONSTRUCTION ACTIVITIES | |
| Start Preliminary Site Assessments (ALTA Survey) | March 2026 |
| Start Pre-Construction Activities (Biological Surveys) | April 2026 |
| SITE MOBILIZATION & CONSTRUCTION: EARLY WORKS | |
| Obtain Notice to Proceed from CEC CPM | June 30, 2026 |
| Start Site Mobilization including WJT Relocation | July 1, 2026 |
| Start Dawn Road Improvements | July 2026 |

| Event Description | Date |
|--|----------------|
| Start Grading (subsurface area, laydown, parking, internal roads) | August 2026 |
| SITE MOBILIZATION & CONSTRUCTION: LATER WORKS | |
| Start Site Mobilization for Subsurface Construction (Air Shaft) | October 2026 |
| Start Reservoir Excavation & Site Grading | March 2027 |
| Start Pouring Major Foundation Concrete (Air Shaft Hoist) | November 2026 |
| Start Vertical Structure Installation (Air Shaft Headframe) | May 2027 |
| Start Controlled Detonations (100 ft bgs in Air Shaft) | September 2027 |
| Start Cavern Construction (horizontal development at 2,000 ft bgs) | December 2028 |
| Begin Installation of Major Topside Equipment | March 2028 |
| Complete Installation of Major Topside Equipment | October 2029 |
| First Plant Synchronization (Startup) | May 2030 |
| TRANSMISSION LINE ACTIVITIES | |
| Start Transmission Line Construction | December 2027 |
| Complete Transmission Line Construction | June 2029 |
| Energization and Interconnection Tests | November 2029 |
| WATER SUPPLY LINE ACTIVITIES | |
| Start Antelope Valley-East Kern Water Agency (“AVEK”) Water Supply Line Connection | February 2027 |
| Complete AVEK Water Supply Line Construction | June 2027 |
| Start Filling Reservoir | July 2029 |
| Complete Filling Reservoir | January 2030 |

5. Compliance Activities: Pre-Construction Phase

This section of the MCR focuses on the activities related to ensuring compliance with all the CoCs that relate to the pre-construction phase of the Project. Project team efforts are focused on developing the pre-construction compliance plans that must be submitted to the CEC CPM for review and approval and, where applicable, to other governmental entities for review and comment, in order to obtain a CEC Notice to Proceed by June 30, 2026, so site mobilization can begin on or before July 1, 2026. Bi-weekly coordination meetings between the CPM, CEC Staff, DCBO, and the GEM LLC team were held during the reporting period to assess progress on submittals and approvals during the reporting period. These meetings are typically held virtually. However, the May 19 meeting was held in person at the CEC’s office in Sacramento. Moving forward, it is anticipated that in-person meetings will be held on a quarterly basis. In addition, as-needed communications with the CPM and CEC Staff outside of the bi-weekly meetings have helped advance the Project. In the future, Gem LLC may request having working sessions with staff to discuss certain compliance submittals. Lastly, separate bi-weekly meetings have now been scheduled between the DCBO and GEM LLC which will occur during intervening weeks between the CPM coordination meetings. GEM LLC appreciates the CPM and CEC Staff willingness and ability to communicate more frequently and in person as the Project moves forward.

Compliance Matrix. The pre-construction compliance matrix was updated during the reporting period to reflect the updated Key Events Schedule discussed in Section 4 above. During the reporting period, the matrix was updated to document the dates that compliance submittals were provided to the CPM, record receipt of CPM comments on the submittals, and note the dates plans were approved by the CPM or other reviewing agencies. The matrix also includes notes where CEC clarification or guidance regarding a CoC has been provided. The updated matrix is provided in Attachment A. Please note that the matrix has been color coded to reflect those items that have been submitted to the CPM (and/or other agencies) as well as items that have been approved by the CPM.

Completed Compliance Activities. Table 2 provides a list of the pre-construction compliance documents that have been submitted during the reporting period, extending to June 9th, as well as any comments and approvals received from the CPM.

Table 2: Submitted Compliance Documents

| CoC # | Description | Submitted to CPM | CEC Comments Received | CPM Approval Date |
|-------------|--|--|-----------------------|--|
| BIO-1 and 3 | Designated Biologist and Biological Monitors | Based on May 8 site visit, additional resume information will be submitted | | April 28, 2026 (Approved all Designated Biologist except one and approved all Biological Monitors except three). |

| CoC # | Description | Submitted to CPM | CEC Comments Received | CPM Approval Date |
|--------|--|---|--|-------------------|
| BIO-5 | Worker Environmental Awareness Plan | May 29, 2026 | | |
| BIO-5 | Sticker for Worker Environmental Awareness Plan | June 3, 2026 | | |
| BIO-6 | Biological Resources Mitigation, Implementation, and Monitoring Plan | May 28, 2026 | | |
| BIO-9 | Integrated Weed Management Plan | May 28, 2026 | | |
| BIO-10 | Invasive Species Management Plan | May 20, 2026 | | |
| BIO-11 | Special Status Plants Annual Survey Plan | May 6, 2026 | CEC comments received May 22 | |
| BIO-12 | Western Joshua Tree Relocation Plan | May 1, 2026, with site visits on May 7 and May 8 | CEC & CDFW comments received on May 22 | |
| BIO-13 | Crotch's Bumble Bee Mortality Reduction and Relocation Plan | May 13, 2026 | | |
| BIO-15 | Annual Survey Plan for Special Status Reptile Species (REV 1) | April 6, 2026, Rev. 1 with site visits on May 7 and May 8 | | April 16, 2026 |
| BIO-16 | Annual Survey Plan for Desert Tortoise | April 6, 2026, Rev. 1 with site visits on May 7 and May 8 | | April 16, 2026 |
| BIO-16 | Raven Management Plan | May 20, 2026 | June 2, 2026 | |

| CoC # | Description | Submitted to CPM | CEC Comments Received | CPM Approval Date |
|-----------|---|--|--|---|
| BIO-17 | Nesting Bird Survey Plan | May 21, 2026 | | |
| BIO-23 | Survey Protocol for Mohave Ground Squirrel | April 6, 2026 Rev. 1 with site visits on May 7 and May 8 | | April 16, 2026 |
| COM-4 | MCR #3 | May 11, 2026 | | |
| COM-13 | Emergency Response Site Contingency Plan | June 2, 2026 | | |
| CUL/TRI-1 | CRS/CRM/Tech. Specialist Qualifications | Additional CRS Qualifications submitted May 31, 2026 | April 22, 2026, Additional Information Requested | May 4, 2026 (Approval for all but two CRMs) |
| CUL/TRI-1 | CRS Qualifications | May 29, 2026 | | |
| CUL/TRI4 | Worker Environmental Awareness Plan | May 29, 2026 | | |
| CUL/TRI-4 | Sticker for Worker Environmental Awareness Plan | June 3, 2026 | | |
| GEO-1 | Geotechnical Report | May 1, 2026 to CPM and DCBO | DCBO comments received on May 18 | |
| HAZ-4 | Construction Site Security Plan | May 21, 2026 | | May 22, 2026 |
| HAZ-6 | Soils Management Plan | To CPM on May 26, 2026 To Kern County on May 27, 2026 | | |
| PAL-1 | PRS and PRM resumes | February 27, 2026 | | March 19, 2026 |
| PAL-4 | Worker Environmental Awareness Plan | May 29, 2026 | | |
| PAL-4 | Sticker for Worker Environmental Awareness Plan | June 3, 2026 | | |

| CoC # | Description | Submitted to CPM | CEC Comments Received | CPM Approval Date |
|-----------------|--|---|--|-------------------|
| SOCIO-1 | Letter re: Contractors hiring locally | May 26, 2026 | | |
| WATER-2 | WDRs, Submittal of Information and Applicable Fees | May 26, 2026 | | |
| WORKER SAFETY-1 | Construction PPE Program | March 25, 2026; Revised plan submitted June 9 2026 | CEC & DCBO Comments received 5/5/2026 | |
| WORKER SAFETY-1 | Construction Injury and Illness Prevention Program | April 15, 2026; Revised plan submitted June 9, 2026 | CEC & DCBO Comments received 5/5/26 | |
| WORKER SAFETY-1 | Construction Emergency Action Plan | April 15, 2026; Revised plan submitted June 9, 2026 | County Fire, CEC & DCBO Comments received 5/5/26 | |
| WORKER SAFETY-1 | Construction Emergency Response Plan | April 15, 2026 | County Fire, CEC & DCBO Comments received 5/5/26 | |
| WORKER SAFETY-1 | Construction Fire Protection Plan | April 15, 2026 | County Fire, CEC & DCBO Comments received 5/5/26 | |
| WORKER SAFETY-7 | Valley Fever Prevention and Response Plan | March 24, 2026; Revised plan submitted June 9, 2026 | CEC & DCBO Comments received 5/5/26 | |

6. Status of Delayed Submittals

The compliance matrix provided in Attachment A, shows there are several submittals which are delayed. These are identified below. The plans listed below have been drafted and are in the process of being finalized. It is anticipated that they will be submitted by the end of June.

- BIO-7: Wildlife Protection and Relocation Plan
- BIO-8: Vegetation Management Plan (VMP)
- BIO-12: Final Western Joshua Tree Relocation Plan
- GEN-2: Schedule of Facility Design Submittals and Master Drawing List
- HAZ-1: Construction Hazardous Material Business Plan (HMBP)
- HAZ-1: Construction Spill Prevention Control and Countermeasure (SPCC)
- LAND-2: Construction Site Plan, Early Works
- TRANS-1: Construction Traffic Management Plan (CTMP)
- WORKER SAFETY-6: Sampling and Analysis Plan
- AQ-SC1: Designate Air Quality Construction Mitigation Manager (AQCMM)
- AQ-SC2: Air Quality Construction Mitigation Plan (AQCMP)
- BIO-19: Burrowing Owl Mortality Reduction and Relocation Plan
- CUL/TRI-3: CTRMMP Cultural/Tribal Resources Mitigation Monitoring Plan
- HAZ-7: Qualified Environmental Professional Resume
- PAL-2: Maps and Drawings to PRS
- PAL-3: Paleontological Resources Monitoring and Mitigation Plan (PRMMP)
- PH -1: Valley Fever Management Plan
- WATER-1: Drainage Erosion and Sedimentation Control Plan (DESCP)
- WORKER SAFETY-3: Name and Contact Information for Construction Safety Supervisor
- WORKER SAFETY-10: AED

7. Approved Changes to Conditions of Certification or Verification Language

As discussed in MCR #2, the CPM approved a construction sequencing approach for the Project that allows certain compliance plans to be prepared and submitted to the CPM in phases consistent with planned Early Works and Late Works construction activities. In addition, the CEC's CPM approved GEM LLC's request to revise the Verification timing for certain Worker Safety required plans. These changes as approved are summarized below.

Approved Changes to Verification Language. To support the Early Works activities, GEM LLC requested modification to the Verification timing of two CoCs to align with the Early Works construction schedule. The CEC CPM in emails to Laurel Lees dated March 16, 2026, and March 27, 2026, approved to Verification timing modifications for some of the CoCs. Specifically, these include:

- Worker Safety-1: The submittal of the Construction Exposure Monitoring Program, Mining Safety and Health Program, and Construction Fire Protection Plan (underground) may occur prior to the start of cavern construction.

In addition, the Staff approved changes allowing the Hazardous Materials Business Plan and the Spill Prevention, Control, and Countermeasure Plan which are included in Worker Safety-1 to be submitted in compliance with the Verification for HAZ-1 (which also requires submittal of these plans) rather than under Worker Safety-1.

- Worker Safety-11: The Verification for item 8 (consultation with the Kern County Fire Department in preparing subsurface fire protection and rescue procedures), and item 9 (pre-construction and excavation conference with the CPM, Cal OSHA Mining and Tunneling Unit, the DCBO, and the DCBO Safety Monitor) can occur prior to the start of cavern construction.
- Worker Safety-11: The Verification timing for item 1 (installation of knox boxes) and item 4 (closed-circuit television) was updated to require demonstration of compliance prior to operations, rather than construction.
- Worker Safety-11: The Verification timing for item 2, installation of remote fire or heat sensors was changed to prior to commissioning. This approval was provided verbally from Alvin Greenberg to Susan Strachan on April 23.
- At the April 16, 2026, bi-monthly CEC-GEM LLC compliance meeting, the CEC CPM concurred that the Rock Crusher Safety Program and Concrete Batch Plan Safety Program could be provided prior to the start of cavern construction, similar to the other Worker Safety-1 plans.

Verification language changes consistent with the CPM's approvals for Worker Safety-1 and Worker Safety-11 are included in Attachment B of this MCR.

Clarifications on Controlled Detonations. Following a March 5, 2026, meeting with CEC Staff, on March 16, 2026, GEM LLC submitted a written request for confirmation that controlled detonations could occur in a 24-hour cycle year-round starting from 100 feet below surface. The written request was reviewed during meetings with the CEC CPM team's subject matter experts on March 19th and April 23rd.

A technical memorandum on the controlled detonation approach was submitted on April 17th, responding to CEC questions from the March 19th meeting. As explained at the March 19th and April 23rd meetings and in the technical memorandum, the first 100 feet of subsurface excavations for the air shaft construction will be dug using mechanical excavators, without use of any detonation for this initial depth. Based on this detail and the supporting technical discussions with subject matter experts, the CEC CPM confirmed that CoCs BIO-7 ("General Impact Avoidance and Minimization Measures") and NOISE-6 ("Construction Noise Restrictions") and Worker Safety-5 ("Project Controlled Detonations Plan") allow controlled detonations to occur in a 24-hour cycle year-round starting from 100 feet below surface. CEC CPM authorization was received via email on March 18th for NOISE-6, April 21st for BIO-7, and April 23rd for Worker Safety-5. In addition, CEC Biology Staff confirmed that they will at their discretion monitor some of the initial detonations at the shallowest depth to confirm the activities are conducted consistent with the authorization.

8. Other Governmental Agency Filings and Submittals

Table 3 identifies meetings and compliance documents submitted to other governmental agencies during the reporting period.

Table 3: Other Governmental Agency Meetings and Submittals During Reporting Period

| Government Agency | File/Permit/Engagement | Date |
|---|---|--------------|
| California Department of Fish & Wildlife | BIO-16 Raven Management Plan | May 20, 2026 |
| | BIO-6 Biological Resources Mitigation Implementation and Monitoring Plan | May 28, 2026 |
| Kern County Department of Planning and Natural Resources | GEM LLC applied for a project site address from Kern County on April 28, 2026. The site address – 1413 Dawn Road – was assigned on June 4, 2026. The address will be registered with the California Department of Tax and Fee Administration (CDTFA) for acquisition, purchasing, and billing purposes, in compliance with Condition Public Benefits-1. | June 4, 2026 |
| Kern County Public Health Services Department – Hazardous Materials | In compliance with Condition HAZ-6, the Soil Management Plan was submitted to the County for review and comment. | May 27, 2026 |

9. Two Month Schedule Outlook

As stated previously, the Project is in the pre-construction phase and working diligently in preparation for Early Works construction activities. In addition to the compliance documents identified in Section 6, the compliance documents listed below are scheduled to be submitted in June 2026.

Due by June 16, 2026

- CUL/TRI-2: Project Info to CRS
- NOISE-1: Notify Residence

Due by June 17, 2026:

- BIO-16: Raven Program Fee Payment

Due By June 21, 2026:

- BIO-24 and BIO-6: Updated Jurisdictional Waters Report
- BIO-06: Final BRMIMP
- CUL/TRI-1: CRS Available for On-site Work

Due By June 22, 2026:

- CUL/TRI-5: Notification of Ground Disturbance
- GEN-5: Registrations, Resumes of Engineers

- NOISE-3: Employee Noise Control Plan
- PUBLIC BENEFITS-1: Use of Sales and Use Taxes
- SOCIO-2: School Facility Development Fee
- SOLID WASTE-1: Construction Waste Management Plan
- TRANS-1: Submit Comment Letters

Due By June 24, 2026

- BIO-08: Final Vegetation Management Plan
- BIO-09: Final Integrated Weed Management Plan
- BIO-10: Final Invasive Species Management Plan
- BIO-13: Final Crotch's Bumble Bee Mortality Reduction and Relocation Plan

10. New Additions to the On-Site Compliance File

Site mobilization and construction have not yet commenced, and as a result, there are currently no new additions to the on-site compliance file. The on-site compliance file will be developed once on-site office trailers have been installed.

11. Incidents and Corrective Actions

Site mobilization and construction activities have not yet commenced for this Project. As a result, there are no incidents or corrective actions. This section will be updated as soon as physical works begin and any compliance related items that require monitoring or action arise.

ATTACHMENT A:
WRESC PRE-CONSTRUCTION COMPLIANCE MATRIX

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

Key Milestones:

| | |
|--|-----------|
| NTP from CEC for Early Works | 6/30/2026 |
| Early Works site mobilization | 7/1/2026 |
| Start Early Works construction of Dawn Road improvements | 7/22/2026 |
| Start Early Works grading of subsurface pad, laydown area, internal roads, and parking | 8/6/2026 |
| Start Later Works site mobilization | 10/8/2026 |
| Start Later Works site grading: reservoir excavation | 6/27/2027 |
| Start Later Works construction | 1/1/2027 |
| Start of special status bio surveys | 4/13/2026 |
| Start of cavern construction at depth | 1/1/2029 |

Color Codes:

| |
|------------------|
| Approved by CPM |
| Submitted to CPM |

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|--|---|--|------------------|---|-----------------------------------|---|--|
| AQ-SC1 | Designate an on-site Air Quality Construction Mitigation Manager (AQCMM) and delegate AQCMMs. | Submit to the CPM for approval the name, resume, qualifications, and contact info for the AQCMM and all AQCMM delegates | At least 30 days prior to ground disturbance | WSP | 6/1/2026 | | | |
| AQ-SC2 | Provide an AQCMP that details the steps that will be taken and the reporting requirements necessary to comply with AQ-SC3, AQ-SC4, and AQ-SC5. | Submit the AQCMP to the CPM for approval. | At least 30 days prior to ground disturbance | WSP | 6/1/2026 | | | |
| BIO-01 | DB Selection: Assign at least one Designated Biologist to the project. | Submit to the CPM for approval the resume(s) and any other relevant documentation. | At least 75 days prior to start of site mobilization | WSP | 4/17/2026 | 2/27/2026 4/22/2026 | 4/28/2026 for only Moss, Paris, Kraft, Moorhatch, Chumley, Wilcox | 3/19/26: CPM requested additional info to complete their review and approval. WSP emailed info in response to CEC request. |
| BIO-03(a) | Biological Monitor Selection: The Designated Biologist shall provide resumes and contact info for Biological Monitors. | Submit the required info to the CPM for review and approval and CDFW for review and comment. | At least 30 days prior to the start of any site mobilization activities. | WSP | 6/1/2026 | 2/27/2026 4/22/2026 | 4/28/2026 for only Urquidi, West, Moreno, Williams, Bukovac, Oki | 3/19/26: CPM requested additional info to complete their review and approval. WSP emailed info in response to CEC request. 4/23/26 Email from Ashley Gutierrez requested additional references for 3 bio monitors. 4/24/26 Jeremy Paris emailed reference info to CPM. |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|---|---|--|------------------|---|-----------------------------------|--------------------------------|---|
| BIO-03b) | The DB will be responsible for training in Biological Monitors prior to onsite monitoring work | The DB shall submit a written statement to the CPM confirming that individual BM's have been trained, including the date when training was completed. | Within 10 days of training | WSP | 7/15/2026 | | | |
| BIO-05 | Worker Environmental Awareness Program: develop and implement a project-specific WEAP | Submit the draft WEAP to the CPM for review and approval and to CDFW for review and comment. | At least 45 days prior to the start of site mobilization | WSP | 5/17/2026 | 5/29/2026 | | 5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed from SS to CPM |
| BIO-06(a) | Develop a Draft Biological Resources Mitigation and Implementation and Monitoring Plan BRMIMP). | Submit draft BRMIMP to CPM for review and approval | At least 45 days prior to the start of site mobilization | WSP | 5/17/2026 | 5/28/2026 | | 5/28/26 WSP emailed to CPM and CDFW |
| BIO-06(b) | Develop a Final Biological Resources Implementation and Monitoring Plan as set forth in the condition | Provide the final BRMIMP to the CPM | At least 10 days prior to start of any site mobilization | WSP | 6/21/2026 | | | |
| BIO-06(d) | To verify that the extent of construction disturbance does not exceed that described in these conditions, the project owner shall submit aerial photographs, at an approved scale, taken before and after construction to the CPM and CDFW. | The first set of aerial photographs shall reflect site conditions prior to any preconstruction site mobilization and construction activities | Submit photographs prior to the start of construction | | 7/15/2026 | | | |
| BIO-06(e) | The project owner shall also provide a final accounting in whole acres of vegetation communities/ cover types present. | Construction acreages shall be rounded to the nearest acre. GIS shapefiles of all pre-and post-disturbance areas should be provided. | Before the start of construction | WSP | 7/15/2026 | | | |
| BIO-07 | Prepare a Wildlife Protection and Relocation Plan | Submit draft plan to CPM for review and comment | At least 45 days prior to site mobilization | WSP | 5/17/2026 | | | |
| BIO-08(a) | Develop a Draft Vegetation Management Plan | Provide draft VMP to the CPM for approval. | At least 45 days prior to start of site mobilization | WSP | 5/17/2026 | | | |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|---|--|---|------------------|---|-----------------------------------|--------------------------------|--|
| BIO-08(b) | Develop a Final Vegetation Management Plan | Provide the Final VMP to the CPM and CDFW. | At least 7 days prior to start of site mobilization | WSP | 6/24/2026 | | | |
| BIO-09(a) | Develop an Integrated Weed Management Plan in consultation with the Designated Biologist. | Submit the Draft IWMP to the CPM for review and approval | At least 60 days prior to the start of pre-construction site mobilization | WSP | 5/2/2026 | 5/28/2026 | | 5/28/26 WSP emailed to CPM |
| BIO-09(b) | Provide the Final Integrated Weed Management Plan | Submit the Final IWMP to the CPM and CDFW | At least 7 days prior to the start of site mobilization | WSP | 6/24/2026 | | | |
| BIO-10(a) | Develop and a Draft Invasive Species Management Plan | Provide a draft Invasive Species Management Plan to the CPM for review and approval | At least 45 days prior to the start of site mobilization | WSP | 5/17/2026 | 5/20/2026 | | 5/20/25: Submitted by WSP |
| BIO-10(b) | Develop and implement a Final Invasive Species Management Plan. | Provide the Final ISMP to the CPM for approval. No site mobilization, ground disturbance, or construction activities may occur prior to this approval. | At least 7 days prior to the start of site mobilization | WSP | 6/24/2026 | | | |
| BIO-11(a) | Develop and submit the proposed Special Status Plants Annual Survey Plan. | Submit the plan to the CPM for review and approval. | 45 days prior to commencing surveys | WSP | 2/27/2026 | 5/6/2026 | | 5/6/26: Submitted by WSP 5/22/26: CPM provided comments |
| BIO-11(b) | If any special status plant species are detected during surveys, the project owner shall document information in the pre-construction survey reports. | Submit the survey report to the CPM, CDFW, and USFWS (if applicable) for review. | 45 days after completion of surveys | WSP | As required | | | |
| BIO-11(c) | If mitigation is required, Project Owner shall prepare a Habitat Enhancement/ Restoration Plan, Formal Acquisition Proposal, Compensation Lands Management Plan, Recent Preliminary Title Report, and Property Analysis Record (PAR) and Security | Submit the required plans to the CPM for review and approval and CDFW/USFWS (if applicable) for review and comment. | No later than 45 days prior to construction | Hydrostor | 6/7/2026 | | | |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|---|--|--|------------------|---|---|--------------------------------|--|
| BIO-11(d) | If plant propagation is proposed as mitigation the project owner shall prepare the Special-Status Plant Propagation and Relocation Plan | Submit the plan to the CPM for review and approval and to the CDFW/USFWS (if applicable) for review and comment. | No later than 45 days prior to construction | WSP if required | 6/7/2026 | | | Surveys have not found the plants affected by this condition |
| BIO-12(a) | Submit an updated Western Joshua Tree Census and WJT Relocation Plan | Submit the updated WJT Census and draft Western Joshua Tree Relocation Plan to the CPM for review and approval, in consultation with CDFW | No less than 45 days prior to commencing any project activities that will impact WJTs, including site mobilization and/or construction | WSP | 6/7/2026 | 5/1/2026 by SS 5/7/26: Word version to CPM | | 5/1/26: Submitted by SS 5/22/26: CPM provided comments, including those by CDFW 6/1/26: Plan with eligible figures submitted by WSP |
| BIO-12(b) | Submit the Final Western Joshua Tree Relocation Plan | Submit the required final plan to the CPM and fees to CDFW Region 4. | Prior to any project activities that will impact WJT | WSP | 6/7/2026 | | | |
| BIO-12(c) | Pay the WJTCA mitigation fees. | Submit the fee payment to CDFW Region 4. | Prior to any project activities that will impact WJT | Hydrostor | 6/23/2026 | TBD | | CEC will invoice HDS upon approval of final WJT Relocation Plan |
| BIO-12(d) | If a new WJT stem or trunk is detected, the project owner shall submit a Notification of New Stem or Trunk | Submit notification to CPM and CDFW for review and comment. No impacts may occur until the CPM approves the notification and CDFW has received applicable mitigation fees. | Prior to any project activities that may impact a new WJT stem or trunk | WSP | As required | | | This items is in the Construction Matrix but also included here in case new stem/trunk is detected since last census. |
| BIO-13(a) | Prepare a draft Crotch's Bumble Bee Mortality Reduction and Relocation Plan | Submit the draft plan to the CPM for review and approval and to the CDFW/for review and comment. | No less than 45 days prior to commencing surveys | WSP | 5/7/2026 | 5/13/2026 | | 5/13/26: Submitted by WSP |
| BIO-13(b) | Prepare a final Crotch's Bumble Bee Mortality Reduction and Relocation Plan | Submit the final plan to the CPM and CDFW | At least 7 days prior to the start of site mobilization | WSP | 6/24/2026 | | | |
| BIO-13(c) | Colony Active Period Season Survey (Feb. 1- Sept.30 Pre-Construction Survey & Observational Submittal | Conduct surveys prior to site mobilization | No more than 10 days prior to initiating or resuming project activities | WSP | June 2026 | | | |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|---|---|--|-------------------|---|---|--------------------------------|--|
| BIO-13(d) | Provide results of each survey | Provide to the CPM for review and approval and to CDFW for review and comment | No more than 45 days after the completion of surveys | WSP | July 2026 | | | |
| BIO-14(a) | Habitat Management Land Acquisition: The project owner shall submit detailed maps identifying areas of permanent and temporary habitat loss, areas avoided, and areas exempt under this condition. | Provide details maps to the CPM for approval, in consultation with CDFW. | Prior to EW site mobilization | Hydrostor/ WSP | 6/16/2026 | | | |
| BIO-14(b) | If the project owner elects to provide for the acquisition, permanent protection, and perpetual management of habitat management lands, the project owner may proceed with activities only after the project owner has ensured the funding (Security) to complete any activity required for Habitat Management Land Acquisition and Protection that has not been completed before the activities begin. | The project owner may proceed with project activities only after the project owner has ensured the funding. | Security - Prior to the start of Early Works project activities | Hydrostor | 7/7/2026 | | | 5/15/26: Email from SS to CPM and CDFW requesting virtual meeting to discuss cost numbers in BIO-14; meeting held on 6/2/26 |
| BIO-15(a) | Provide proposed annual survey plan for Special Status Reptile Species | Submit the proposed annual survey plan 45 days prior to commencing the surveys to the CPM for review and approval and to the CDFW for review and comment. | 45 days prior to conducting surveys | WSP | Complete | Rev 0 submitted 3/11/2026 Rev 1 submitted 4/6/26 | 4/16/26 | 3/11/26: WSP submitted plan to CPM 3/19/26: CPM requested additional info to correct plan and resubmit 4/6/26: Rev1 to CPM 4/16/2026: Approved by CPM |
| BIO-15(b) | Provide the final survey plan for Special Status Reptile Species to the CEC | Submit the final Special Status Reptile Species plan to the CPM | At least 10 days prior to start of any site mobilization | WSP | 6/21/2026 | | 4/16/2026 | 4/16/26: Approved by CEC |
| BIO-15(c) | Conduct Special Status Reptile Species protocol surveys | Conduct surveys | One week prior to ground disturbance and within 24 hours of beginning work in suitable habitat | WSP | 6/24/2026 | | | |
| BIO-15(d) | Prepare Special Status Reptile Species pre-construction survey reports | Submit to the CPM and CDFW | Within 7 days of completing the surveys | WSP | April-May 2026 | | | |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|--|---|--|------------------|---|-----------------------------------|--------------------------------|---|
| BIO-15(e) | Prior to conducting the Special Status Reptile Species surveys, the biologist shall locate the microhabitats for these species and determine a location to place cover boards or rake soils. | A map of proposed survey areas shall be provided to the CPM for review and approval. | Prior to initiating the coverboard surveys | WSP | May-June 2026 | | | |
| BIO-16(a) | Prepare a Proposed Annual Survey Plan for Desert Tortoise | Submit the proposed annual DT survey plan to the CPM for review and approval and to the CDFW for review and comment. | 45 days prior to commencing surveys | WSP | Complete | 3/10/2026 | 4/16/2026 | 3/19/26: CPM email requested additional info. 4/6/26: Plan resubmitted to CPM 4/16/26 approved by CPM |
| BIO-16(b) | Conduct DT protocol surveys | Submit the pre-construction protocol survey reports to the CPM, CDFW, and USFW | No more than 45 days after each survey effort has been completed | WSP | April-May 2026 | | | |
| BIO-16(c) | Conduct DT clearance surveys within areas of found suitable habitat | Conduct clearance surveys 1 week prior to ground disturbance | 1 week prior to ground disturbance | WSP | May 2026 | | | |
| BIO-16(d) | Conduct DT clearance surveys within areas of found suitable habitat | Conduct clearance surveys 24 hours prior to ground disturbance | 24 hours prior to ground disturbance | WSP | May 2026 | | | |
| BIO-16(e) | If DT or active burrows are detected during pre-clearance surveys, stop work within 200 feet of any potential burrow or DT. | DB to contact the CPM, CDFW, and USFWS immediately for guidance. | As required | WSP | As required | | | |
| BIO-16(f) | Install DT exclusion fencing around the project site, laydown, staging and parking areas. | Exclusion fence specifications shall be approved by the CPM and be consistent with those described in the most recent Desert Tortoise Field Manual or more current guidance provided by CDFW and USFWS. | During pre-construction surveys per CPM 3/16/26 email | Hatch | May/June 2026 | | | 6/3/26: Email from CEC Staff Alex Single confirms the project does not need Desert Tortoise fencing around the entire site at this point. Areas that would be impacted by significant activity including earthmoving, WJT removal, parking, and lay-down/staging areas should be fenced. Fencing installation can be delayed in project areas where no work would take place yet. CEC Biology staff confirm that the project does not need Desert Tortoise fencing around the WJT Relocation Sites. |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|--|---|---|------------------|---|-----------------------------------|--------------------------------|--|
| BIO-16(g) | Prepare and implement a Raven Management and Reporting Plan consistent with CDFW and USFWS raven management guidelines. | Submit the plan to the CPM for review and approval in coordination with the CDFW and USFWS. | Prior to the start of site mobilization | WSP | 6/1/2026 | 5/20/2026 | | 5/20/2025: WSP emailed plan to CPM |
| BIO-16(h) | The Project Owner shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of \$105 per acre of long-term or permanent project disturbance. | Submit receipt of payment to the USFWS Regional Raven Mgmt Program. | 14 days prior to the start of site mobilization activities | Hydrostor | 6/17/2026 | | | |
| BIO-16(i) | Prepare a report documenting the survey results and other specific information required in the CoC | Submit report to CPM, CDFW, and USFWS | Within 14 days after completing surveys | WSP | June-July 2026 | | | |
| BIO-17(a) | Nesting Bird Avoidance & Minimization: Prepare a Nesting Bird Management Plan per Items 6a-h in the Condition. | Submit the Nesting Bird Management Plan to the CPM for review and approval. | Condition does not include a timeframe. | WSP | 6/24/2026 | 5/21/2026 | | 5/21/26: WSP emailed plan to CPM |
| BIO-17(b) | Conduct at least TWO pre-construction nest surveys separated by a minimum 10-day interval during the breeding season for local and migratory birds (). One of the surveys must be conducted within 3 day period preceding initiation of site mobilization, brush clearing, ground disturbance, or construction activity Upon discovery of an active nest the default buffer identified in the NBMP shall be applied. | Conduct the pre-construction nesting bird surveys. | Jan 1-Aug 31 for raptors and Mar 1-Aug 31 other species | WSP | May-June 2026 | | | |
| BIO-17(c) | Prepare the pre-construction survey reports. | Submit the pre-construction nesting bird survey reports to the CPM and CDFW | No more than 30 days after each survey effort has been completed. | WSP | June-July 2026 | | | |
| BIO-17(d) | The project owner shall provide a letter report detailing the outcome of the care of any injured birds or nest failures | Submit to the CPM and the CDFW | Within 14 days of the incident | WSP | As required | | | |
| BIO-19(a) | Prepare a Burrowing Owl Mortality Reduction and Replacement Plan | Submit the plan for review and approval to the CPM, and to CDFW for review and comment | At least 30 days prior to initiation of site mobilization | WSP | 6/1/2026 | | | |
| BIO-19(b) | Conduct pre-construction nesting surveys for burrowing owls. | The Designated Biologist shall provide the preconstruction survey results to the CPM. | Within 14 days of the completion of the survey | WSP | 7/1/2026 | | | 5/1/26: BUOW observation notice provided to CPM. 6/9/26: Observation Notice Followup sent to CPM from WSP |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|--|---|--|------------------|---|-----------------------------------|--------------------------------|--|
| BIO-19(c) | If surveys detect burrowing owls within 1,600 feet of proposed construction activities, install non-disturbance buffer fencing.. | The Designated Biologist shall provide to the CPM documentation indicating that the fencing has been installed. | No less than 10 days prior to the start of any project-related site disturbance activities | WSP | 6/21/2026 | | | |
| BIO-19(d) | Provide a Keyhole Markup Language (KMZ) map and GIS shapefiles to the CPM of all burrowing owl burrows found during the surveys conducted during the surveys | The Designated Biologist shall provide the required information. | Within 14 days of the completion of the survey | WSP | June 2026 | | | |
| BIO-20(a) | Conduct protocol surveys for Swainson's hawks and avoid all occupied nests | Provide the resumes of proposed Swainson's hawks surveyors to the CPM for approval and the CDFW and USFWS for concurrence prior to conducting surveys | 45 days prior to conducting surveys | WSP | April 2026 | | | |
| BIO-20(b) | Provide a map identifying all potential nesting habitat in or within 0.5 miles of proposed disturbance areas. | Provide the map to the CPM and CDFW. | Prior to conducting surveys | WSP | TBD | | | |
| BIO-21(a) | DB shall conduct pre-construction surveys to identify areas that support dense concentrations of small mammal burrows that could be utilized by Tulare grasshopper mouse, Tehachapi pocket mouse, and San Joaquin pocket mouse | Provide the survey reports to the CPM and CDFW | Surveys to be conducted prior to site mobilization during May 1-July 15 | WSP | May 2026 | | | |
| BIO-21(b) | DB shall conduct a clearance survey of the project site and laydown areas to identify new or modified dense small mammal burrow concentrations they may not have been identified during pre-construction surveys. | Provide the survey reports to the CPM and CDFW | Prior to any site mobilization | WSP | 6/21/2026 | | | |
| BIO-22 | Conduct pre-construction surveys for American badger, desert kit fox, and ringtail shall be conducted within a 500-foot radius of all project disturbance areas and where legal access is granted. | Submit the pre-construction survey reports to the CPM and CDFW | No more than 30 days after each survey effort has been completed. | WSP | June 2026 | | | |
| BIO-23(a) | Prepare pre-construction survey protocol for Mohave Ground Squirrel | Submit survey protocol to the CPM for review and approval and the CDFW for reivev and comment. | No less than 45 days prior to conducting the surveys | WSP | Complete | 3/9/2026 | 4/16/26 | 3/19/26: Email from CPM requesting modifications to plan. 4/6/26: Resubmitted to CPM 4/16/26 Approved by CPM |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|---|---|--|------------------|---|-----------------------------------|--------------------------------|--|
| BIO-23(b) | Prepare the pre-construction survey reports | Submit prptocol surveys and submit written reports to CPM and CDFW | No more than 21 days after the survey effort is completed | WSP | 6/1/2026 | | | |
| BIO-24(a) | Provide a copy of the Streambed Impact Minimization and Compensation Measures and WDR to contractors, subcontractors, and project supervisors. | | Prior to site mobilization | WSP | 6/21/2026 | | | |
| BIO-24(b) | Prepare a Stream Diversion Plan | Provide to CPM for review and approval and CDFW for review and comment. | Timeframe not provided in Condition | WSP | TBD | | | |
| BIO-24(c) | Updated Jurisdictional Waters Report, the proposed engineering drawings for each crossing, and the hydrologic studies used to inform the designs. | Provide to the CPM for review and approval | No less than 45 days prior to site mobilization. | WSP | 6/21/2026 | | | |
| BIO-24(d) | Provide Final Reports and Plans | Provide to CPM and CDFW | No later than 14 days prior to the installation of any engineered crossing or culvert | WSP | TBD | | | |
| CIVIL-01(a) | Prepare a drainage structure design and grading plan | Submit required plan to DCBO for design review and approval | At least 15 days prior (or a project owner and DCBO mutually agreed upon alternative time frame) | Hatch | 7/22/2026 | | | 4/21/26: DCBO has received partial spec pkg only. Need additional refs, specs and drawings |
| CIVIL-01(b) | Prepare a erosion & sedimentation control plan | Submit required plan to DCBO for design review and approval | At least 15 days prior (or a project owner and DCBO mutually agreed upon alternative time frame) | WSP | 7/22/2026 | | | 3/16/26: CPM email agrees to construction sequencing in development of this plan but Hydrostor should confirm with DCBO. |
| CIVIL-01(c) | Provide calcs and specs signed by Civil Engineer | Provide required plan to DCBO for design review and approval | At least 15 days prior (or a project owner and DCBO mutually agreed upon alternative time frame) | Hatch | 7/22/2026 | | | 3/16/26: CPM email agrees to construction sequencing in development of this plan but Hydrostor should confirm with DCBO. |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|---|--|--|--------------------------------|---|-----------------------------------|--------------------------------|--|
| CIVIL-01(d) | Provide soils, geotech, and foundation investigation reports required by 2025 CBC. | Submit required reports to DCBO for design review and approval | At least 15 days prior (or a project owner and DCBO mutually agreed upon alternative time frame) | Hydrostor will provide to DCBO | 7/22/2026 | | | 3/16/26: CPM email agrees to construction sequencing in development of this plan but Hydrostor should confirm with DCBO. |
| CIVIL-01(e) | The project owner shall submit a written statement certifying that the documents have been approved by the DCBO. | The project owner shall submit a written statement certifying that the documents have been approved by the DCBO. | In the next MCR following the DCBO's approval | Hydrostor will provide to DCBO | Monthly in MCR | | | |
| COM-3 | Compliance Verification Submittals | Follow submittal protocol set forth in Condition | Ongoing | Strachan | Ongoing | | | |
| COM-04 | Site mobilization and construction activities shall not start until the following have occurred: 1) the project owner has submitted the pre-construction matrix and all compliance verifications pertaining to pre-construction Conditions of Certification; and 2) the CPM has issued a Notice to Proceed letter to the project owner. | Submit the PC compliance matrix and required PC submittals | With first PC compliance submittal or provide at first pre-construction meeting with CEC | Strachan | Ongoing | 4/29/2026 | | Ongoing |
| COM-05 | Prepare a Compliance Matrix that meets the specifications listed in the condition | Submit a compliance matrix with each MCR. | Monthly | Strachan | Monthly in MCR | | | Updated version of PC matrix will be included as an attachment to |
| COM-06 | Prepare a Monthly Compliance Report | Submit to the CPM | Monthly | Strachan | Due by 10th of each month | | | 5/11/26: MCR #3 submitted to CPM |
| COM-07 | Conduct a compliance kickoff meeting with Kern County Planning and Natural Resources, Fire Department, and Public Works | | Held 3/2/26 and ongoing | Hydrostor | Complete | | | |
| COM-13 | Prepare an Emergency Response Site Contingency Plan | Submit the plan to the CPM for review and approval | No less than 60 days prior to the start of construction | WSP | 5/23/2026 | 6/2/2026 | | 6/2/26: WSP emailed plan to CPM |
| CUL/TRI-01(a) | Assign a Cultural Resources Specialist (CRS) to the project. No ground disturbances shall occur prior to CPM approval of the CRS and alternates unless such activities are specifically approved by the CPM. | Submit the qualifications for the CRS and Alternative CRS to the CPM | At least 45 days prior to start of ground disturbance associated with site mobilization & construction | WSP | 5/17/2026 | 2/27/2026 4/22/2026 | 5/4/2026 for Arp and Schroeder | 3/18/26: CPM provided email asking for further information on qualifications of CRS 4/22/26: Resubmitted to CPM |

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|--|---|---|--|------------------|---|-----------------------------------|--------------------------------|--|
| CUL/TRI-01(a) | | | | | | 5/29/2026 | | 5/29/26: Submitted updated resume for Clint Helton |
| CUL/TRI-01(b) | Assign Cultural Resource Monitors (CRMs) to the project. | Provide proof of qualifications to the CPM. | At least 20 days prior to site mobilization | WSP | 6/11/2026 | 2/27/2026 4/22/2026 | 5/4/2026 for Singer | 3/18/26: CPM provided email asking for further information on qualifications of CRS 4/22/26: Resubmitted to CPM |
| CUL/TRI-01(c) | Assign Native American Monitors from the tribes specified in the CoC. | Submit a copy of the request and a copy of a response letter to the group notifying them that Native American Monitors have been employed and identifying the Native American Monitors. | Within 15 days of receiving tribal request | WSP | TBD | | | |
| CUL/TRI-01(d) | If efforts to obtain the services of qualified Native American Monitors are unsuccessful, the project owner shall inform the CPM of this situation in writing. | Inform the CPM in writing. | At least 30 days prior to the beginning of post certification CRs field work | WSP | TBD | | | |
| CUL/TRI-01(e) | Assign Cultural Resource Technical Specialists to the project | Submit resumes to the CPM for approval. | At least 20 days prior to site mobilization | WSP | 6/11/2026 | 2/27/2026 4/22/2026 | | 3/18/26: CPM provided email asking for further information on qualifications of CRS 4/22/26: Resubmitted to CPM |
| CUL/TRI-01(f) | The Project Owner will confirm in writing that the approved CRS will be available for onsite work and is prepared to implement the cultural resources conditions. | Submit letter to the CPM | At least 10 days prior to the start of construction-related ground disturbance | Hyrdostor | 6/21/2026 | | | |
| CUL/TRI-02(a) | Provide the CRS with copies of the AFC, data responses, confidential cultural resources reports, all supplements, the cultural and tribal cultural resources section from the CEC's FSA, and the CoCs from Final Decision, as well as maps and drawings of the project site and ancillary facilities. | Provide notice to the CPM that the required documents have been provided to the CRS. The CPM will review submittals in consultation with the CRS and approve maps and drawings suitable for cultural resources planning activities. | At least 15 days prior to the start of ground disturbance | WSP and Hatch | 6/16/2026 | | | |
| CUL/TRI-02(b) | If there are changes to any project-related footprint, the project owner shall provide revised maps and drawings for the changes. | Submit the revised information to the CPM | At least 15 days prior to the start of ground disturbance | Hatch | 6/16/2026 | | | |

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|--|--|--|---|------------------|---|-----------------------------------|--------------------------------|--|
| CUL/TRI-03(a) | Prepare a CTRMMP under the direction of the CRS in coordination with the consulting tribes choosing to participate in the development of the plan. | Submit the CTRMMP to the CPM for review and approval. | At least 30 days prior to the start of ground disturbance | WSP | 6/1/2026 | | | |
| CUL/TRI-03(b) | Submit a letter to the CPM that the project owner agrees to pay curation fees. | Submit letter to CPM | At least 30 days prior to the start of ground disturbance | Hydrostor | 6/1/2026 | 2/27/2026 | 3/18/2026 | 3/18/26: CPM email confirmed receipt of Project Owner's letter as partial approval of this condition.. |
| CUL/TRI-04(a) | Prepare a Cultural Resources WEAP | The CRS shall provide the draft text and/or training video for the cultural and tribal cultural resources WEAP, including Native American participation, and graphics and the informational brochure to the CPM for review and approval. | At least 30 days prior to the start of ground disturbance | WSP | 6/1/2026 | 5/29/2026 | | 5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed from SS to CPM |
| CUL/TRI-04(b) | Provide a WEAP Training Acknowledgement form for each WEAP-trained worker to sign. This will be provided by the CPM to the Project Owner. | The CRS shall inform the cultural resources representatives for the consulting tribes of the upcoming training and invite them to attend and/or participate should they elect to. | At least 15 days prior to ground disturbance and at least 10 days prior to each WEAP training offered | CPM | 6/16/2026 | | 6/3/2026 | 6/3/26: WEAP Training form received from CPM |
| CUL/TRI-05(a) | The project owner shall ensure that a CRS, alternative CRS, or CRM and Native American Monitor shall be present for any ground disturbance associated with construction of the project, including but not limited to tree/shrub removal and planting, clearing,/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, and hardscape installation. | The Project Owner shall notify the CPM and all interested California Native American tribes of the date on which ground disturbance will begin. The CPM will provide the CRS an electronic form to be used as a daily monitoring log and info. | At least 30 days prior to the start of ground disturbance | WSP | 6/22/2026 | | | |
| CUL/TRI-05(b) | The project owner shall provide the CPM and CRS with a letter confirming that the CRS, Alternate CRS, CRMs, and Native American Monitors have the authority to halt ground disturbance in the vicinity of a cultural or tribal cultural resource discovery | Submit the required letter to the CPM and CRS. | At least 30 days prior to the start of ground disturbance | WSP | 6/1/2026 | 2/27/2026 | 3/18/2026 | 3/18/26: CPM email confirmed receipt of Project Owner's letter as an approval of this condition.. |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

| Condition of Certification (sorted alphabetically) | Description (always refer to Appendix A of Final Decision for detailed language) | Verification/Action/Submittal Required by Project Owner | Timeframe | Lead Resp. Party | Date Due to CPM Based on Key Milestones | Actual Date to CPM, CBO or Agency | Date Approved by CPM or Agency | Notes/Status |
|--|--|--|---|------------------|---|-----------------------------------|--------------------------------|--|
| GEN-02 | Furnish the CPM and the DCBO with a schedule of facility design submittals and master drawings and master specifications list, including a list of proposed submittal packages of designs, calcs, and specs for major structures, systems, and equipment. | Submit required schedule, master drawings and master specifications list of documents to CPM and DCBO. Provide schedule updates in the MCR. | At least 60 days prior to start of rough grading or alternative date agreed to by DCBO | Hatch and CMT | 6/7/2026 | | | 3/16/26: CPM email agrees to construction sequencing in development of this plan but Hydrostor should confirm with DCBO. |
| GEN-03 | The project owner shall make payments to the DCBO for design review plan checks, construction inspections, and other applicable DCBO activities, based upon a reasonable fee schedule to be negotiated between the project owner and the DCBO. If the CEC delegates the DCBO function to an independent third party or local agency, ¹ the project owner, at the CEC's direction, shall make payments directly to the DCBO based upon a fee schedule negotiated between the CEC and the DCBO. | The project owner shall send a copy of the DCBO's receipt of payment to the CPM. | Monthly (in the next MCR) | Hydrostor | Monthly in MCR | | 5/7/2026 | Approval received via DCBO Weekly Status Report to HDS Project Management Team |
| GEN-04(a) | Assign a California-registered architect, or a structural or civil engineer, as the resident engineer in charge of the project. | Submit to the DCBO for review and approval, the resume and registration number of the resident engineer and any other delegated engineers assigned to the project. | At least 30 days prior to start of rough grading or alternative date agreed to by DCBO | Hatch | 7/7/2026 | | | |
| GEN-04(b) | Obtain DCBO approval of the assigned engineers. | Notify the CPM of the DCBO's approvals of the RE and other delegated engineer(s) within five days of the approval. | Within 5 days of approval of GEN-04(a) | Hatch | 7/17/2026 | | | |
| GEN-05(a) | Assign at least one of each of the following California registered engineers to the project: a civil engineer; a soils, geotechnical, or civil engineer experienced and knowledgeable in the practice of soils engineering; and an engineering geologist. | Submit to the DCBO for review and approval, resumes and registration numbers of the responsible engineers. | At least 30 days prior to the start of rough grading or alternative date mutually agreed to by project owner and DCBO | Hatch/CMT | 6/22/2026 | 6/9/2026 | 6/10/2026 by DCBO | 6/9/26: Strachan Consulting submitted resume of Evan Hsaio to CPM and DCBO |

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|--|--|--|--|------------------|---|-----------------------------------|--------------------------------|---|
| GEN-05(b) | Assign at least one of each of the following California registered engineers to the project: a design engineer who is either a structural engineer or a civil engineer fully competent and proficient in the design of project structures and equipment supports; a mechanical engineer; and an electrical engineer. | Submit to the DCBO for review and approval, resumes and registration numbers of the responsible engineers. | At least 30 days prior to the start of construction or alternative date mutually agreed to by project owner and DCBO | Hatch/CMT | 9/8/2026 | | | |
| GEN-05(c) | Obtain the DCBO's approval of the assigned engineers. | Notify the CPM of the DCBO's approvals of the responsible engineers. | Within 5 days of DCBO approval | Hatch/CMT | | | | 6/10/26: DCBO approval of Evan Hsaio sent to CPM via email by Strachan Consulting |
| GEO-01 | If the DCBO determines that investigative conditions exist, the project owner shall perform geotechnical investigations for the areas set forth in the CoC and prepare a written geotechnical report. | Submit the geotechnical report to the DCBO for review and approval. Provide the CPM with copies of the investigations and geohazards report and any comments by the DCBO. | At least 60 days before grading | WSP | 6/7/2026 | 5/5/2026 | | 5/7/26: DCBO provided comments |
| HAZ-01(a) | Prepare a Construction Hazardous Materials Business Plan. | Submit the documents to the CPM for review and approval and to the KCPHSD - Hazardous Materials Division for review and comment. Also provide a copy of transmittal letter to KCPHSD- Hazardous Materials Division to the CPM. | At least 60 days prior to the start of construction | WSP | 5/23/2026 | | | Documentation for HMBP will be submitted on-line |
| HAZ-01(b) | Prepare a Spill Prevention Control and Countermeasure Plan. | Provide copies of any comment letters received from the KCPHSD-Hazardous Materials Division along with any changes to the plans for CPM review and approval | At least 60 days prior to the start of construction | WSP | 5/23/2026 | | | |
| HAZ-04 | Prepare a site-specific Construction Site Security Plan | Notify the CPM that the plan is available for review and approval. | At least 30 days prior to the start of construction | WSP | 6/22/2026 | 5/21/2026 | 5/22/2026 | 5/22/26: CPM approved plan |
| HAZ-06(a) | Prepare a Soils Management Plan | Submit the SMP to the CPM for review and approval. | At least 45 days prior to ground disturbance | WSP | 5/17/2026 | 5/26/2026 | | 5/26/26 WSP emailed plan to CPM |

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

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|--|--|---|---|---------------------|---|-----------------------------------|--------------------------------|------------------|
| HAZ-06(b) | Prepare a Soils Management Plan | Submit the SMP to the Kern County Public Health Services Dept. for review and comment. | At least 45 days prior to ground disturbance | WSP | 5/17/2026 | 5/27/2026 | | 5/17/26 SS to KC |
| HAZ-07 | Provide the resume of qualified environmental professional with experience in remedial investigation and feasibility studies who shall be available for consultation during site characterization, demolition, excavation, and grading activities. | Submit the resume to the CPM for review and approval. | At least 30 days prior to the start of site mobilization | WSP | 6/1/2026 | | | |
| LAND-01 | Prior to the commencement of construction, the project owner shall obtain any necessary permits from the Kern County Planning and Natural Resources Department, or other relevant departments, for development of temporary laydown and parking areas referred to as Villa Haines (VH). The project owner shall pay Kern County fees for review and comment and demonstrate compliance with requirements for development of the laydown and parking areas referred to as P1, P2 N, and P2 S. | Provide the CPM the required approved permits for the temporary laydown and parking areas and provide documentation showing payment to Kern County for fees for review. | At least 30 days prior to development of any temporary laydown and parking areas | Hydrostor | 7/7/2026 | | | |
| LAND-02(a) | Develop a construction site plan for early works activities | Submit to the Kern County Planning and Natural Resources Department for review and comment and to the CPM for approval. | At least 60 days prior to any grading or development for early works permanent project facilities | Hatch/ Hydrostor | 6/7/2026 | | | |
| LAND-02(b) | Provide any review comments from Kern Co. to the CPM | Submit Kern County's comments to the CPM | At least 30 days prior to prior to any grading or development for permanent project facilities | Hatch | 7/7/2026 | | | |

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|--|--|---|---|------------------|---|-----------------------------------|--------------------------------|--|
| NOISE-01 | Notify residences within one mile of the project site by mail, or by other effective means, of the commencement of project construction. At the same time, the project owner shall establish a telephone number for use by the public to report any undesirable noise conditions associated with the construction of the project. Telephone # to be posted at construction site. | Transmit to the CPM a statement, signed by the project owner's project manager, stating that the notification has been performed, and describing the method of that notification. The statement must also verify that the phone # has been established, visibly posted at the site and included in the statement. | At least 15 days prior to ground disturbance | Hydrostor | 6/16/2026 | | | |
| NOISE-03 | Prepare a Employee Noise Control Program | Submit the plan to the CPM for review and approval | At least 30 days prior to the start of ground disturbance | WSP | 6/22/2026 | | | Plan must be made available to Cal-OSHA upon request |
| NOISE-06 | Limit the use of heavy equipment operations and noisy construction work to the hours specified in the Condition. | Transmit to the CPM a statement acknowledging that the above restrictions will be observed throughout the construction of the project. | Prior to ground disturbance | Hatch/CMT | 7/15/2026 | | | 3/18/26: CEC team confirmed HDS request that 24/7 controlled detonation work starting from 100 feet below surface will not cause impacts to noise receptors. |
| PAL-01(a) | Provide the resume, qualifications, and contact information of its paleontological resource specialist (PRS) | Submit resume and statement of PRS availability to the CPM for review and approval | At least 60 days prior to the start of ground disturbance | WSP | 5/2/2026 | 2/27/2026 | 3/19/2026 | |
| PAL-01(b) | PRS to obtain qualified paleontological resource monitors (PRMs) | Provide a letter with resumes naming anticipated PRMs for the project that states the identified PRMs meet the minimum qualifications for paleontological resource monitoring as required by the Condition. | At least 30 days prior to ground disturbance | WSP | 6/1/2026 | 2/27/2026 | 3/19/2026 | |
| PAL-02 | Provide the PRS and CPM maps and drawings showing the footprint of the power plant, construction laydown areas, and all related facilities. Maps shall identify all areas of the project where ground disturbance is anticipated. | Submit the documents to the PRS and CPM for review and approval. | At least 30 days prior to the start of ground disturbance | Hatch | 6/1/2026 | | | 3/5/26 CEC agreed that plans can be submitted sequentially with construction phasing. (See Laurel Lees 3/5/26 meeting summary email). |

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|--|--|--|---|------------------|---|-----------------------------------|--------------------------------|---|
| PAL-03 | The PRS shall prepare a Paleontological Resources Monitoring and Mitigation Plan | Submit the plan to the CPM for review and approval. The PRMMP must be approved prior to any ground disturbance. | At least 30 days prior to ground disturbance | WSP | 6/1/2026 | | | |
| PAL-04(a) | The PRS shall prepare a Paleo WEAP | Submit the draft WEAP, including the brochure and sticker, to the CPM for review and comments | At least 30 days prior to ground disturbance | WSP | 6/1/2026 | 5/29/2026 | | 5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed from SS to CPM |
| PAL-04(b) | Prepare the final WEAP and training script | Submit the final WEAP and training script to the CPM for approval | At least 15 days prior to ground disturbance | WSP | 6/16/2026 | | | |
| PUBLIC BENEFITS-01 | The Project Owner shall work with the County to determine how the use of sales and use taxes from the construction of the project can be maximized. | Submit a letter to the CPM detailing the agreement with Kern County on the use of sales and taxes from project construction or proof of payment of the equivalent amount of sales and use taxes was paid to Kern County. | At least 30 days prior to the start of construction | Hydrostor | 6/22/2026 | | | |
| PUBLIC HEALTH-01 | Develop and implement a Valley Fever Management Plan that addresses the specific requirements in the Condition. | Submit the plan to the CPM for review and approval. | At least 30 days prior to the start of ground disturbance | WSP | 6/1/2026 | | | |
| SOCIO-01 | The project owner and its contractors shall make a good faith effort to hire at least 50 percent of their workers from local Kern County communities. The project owner shall provide the contractors a list of training programs that provide skilled workers and shall require the contractor to advertise locally for available jobs, notifying the training programs of job availability, all in conjunction with normal hiring practices of the contractor. | Submit a letter to the CPM detailing the hiring efforts prior to commencement of construction, which encourages all contractors of the project site to hire at least 50 percent of their workers from local Kern County communities. | At least 60 days prior to the start of construction | Hydrostor | Complete | 5/26/2026 | | 5/26/26: Letter from Noah Eckert to CPM |

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|--|--|---|---|------------------|---|-----------------------------------|--------------------------------|--|
| SOCIO-02 | Pay the current one-time statutory school facility development fee to Mojave Unified School District as authorized by Education Code Section 17620 and the Mojave Unified School District Board Policy BP 7211 Facilities: Developer Fees. | Provide to the CPM proof of payment to the Mojave Unified School District of the statutory development fees. | At least 30 days prior to the start of construction | Hydrostor | 6/22/2026 | | | |
| SOLID WASTE-01 | Prepare a Construction Waste Management Plan for all wastes generated during construction of the facility. | Submit the plan to the CPM for review and approval. | No less than 30 days prior to the start of construction | WSP | 6/22/2026 | | | |
| TRANS-01(a) | Prepare a Construction Traffic Management Plan | Submit the CTMP to Kern County, Caltrans, and CHP for review and comment | At least 60 days prior to the start of construction | WSP | 5/23/2026 | | | Separate CTMPs will be prepared for the project site and the gen-tie line. |
| TRANS-01(b) | Submit the CTMP to the CPM along with a copy of the transmittal letter to Kern County, Caltrans and CHP requesting review and comment. | Submit the plan and transmittal letters to the CPM for review and approval. | At least 60 days prior to the start of construction | WSP | 5/23/2026 | | | |
| TRANS-01(c) | Provide copies of any comment letters received from Kern County, Caltrans, CHP, or any other interested agencies, along with any changes to the CTMP. | Provide the info to the CPM for review and approval. | At least 30 days prior to the start of construction | WSP | 6/22/2026 | | | |
| TRANS-02(a) | The project owner shall provide an irrevocable offer of dedication to Kern County for the Dawn Rd and Sierra Highway roadways, as specified in the Condition. | Provide offer of right-of-way dedication for segments of Dawn Road and Sierra Hwy. adjacent to the project site. | Prior to the start of construction | Hydrostor | 7/12/2026 | | | |
| TRANS-02(b) | The project owner shall also commence construction of an asphalt concrete paved road approach at the proposed Dawn Road entrance at Sierra Highway, extending 200 feet into the project site. | Obtain encroachment permits from Kern Co. PWD and Caltrans. | Concurrent with site mobilization and grading | Hatch | 7/22/26 | | | |
| TRANS-02(c) | All proposed on-site access and parking improvement plans for the construction phase will be submitted to Kern County and Caltrans for review and comment and to the CPM for review and approval. | Submit the required plans to Kern County, Caltrans for review and comment and to the CPM as required for review and approval. | Before construction begins | Hatch | 7/7/2026 | | | |

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|--|--|---|--|------------------|---|-----------------------------------|--------------------------------|---|
| VIS-02 | Prepare an outdoor sign or signage plan | Submit to the CPM for approval and to the Director of Planning and Natural Resources Dept for review and comment | 30 days prior to installation | WSP | TBD | | | |
| WATER-01 | Prepare a Drainage Erosion and Sedimentation Control Plan (DESCP) for managing stormwater during Project construction | Submit the DESCPC to the CPM for review and to KC and Lahontan RWQCB, if required. | No later than 30 days prior to state of site mobilization for EW | WSP | 6/1/2026 | | | |
| WATER-02 | The project own shall comply with the Waste Discharge Requirements (WDRs) established in Attachment A to the CoC in Final Decision. | Submit to Lahontan RWQCB all necessary info and applicable fees, and submit copies of all application submittals to the CPM. | At least 60 days prior to construction of EW | WSP | 5/23/2026 | 5/26/2026 | | 5/26/26 Letter from Noah Eckert to CPM |
| Kern County WDRs (p. A.A-5) | Section E. Requirements for Stormwater Discharges: Stormwater must be managed throughout construction to minimize erosion and the discharge of BMPs must be implemented until permanent soil stabilization is in place and good housekeeping practices must be implemented to minimize the potential for non-stormwater discharges to degrade water quality. | The Applicant must develop a BMP implementation plan (BMP Plan) and install temporary erosion control facilities to prevent transport of earthen materials and other wastes off the property. Guidance for developing the BMP Plan is provided in Appendix 1. | Prior to the initiation of any construction related activities | WSP | 7/15/2026 | | | |
| WATER-05(a) | The project owner shall obtain CEC approval in consultation with DWR-DSOD of dam plans and specifications prior to commencing construction of the HC-reservoir embankment in accordance with Water Code section 6200. The project owner shall provide the CEC in consultation with DWR-DSOD with information to achieve the milestones of the design approval process as set forth in Items 1-6. | Any documents submitted to the DWR-DSOD including but not limited to application materials, geotechnical reports, design drawings, pictures, soil studies, or hazards analysis, shall be provided contemporaneously to the CPM and DWR-DSOD for review. | As required | | | 4/27/2026 | | 4/27/26: Application for Dam Construction Permit, 30% Plan Set, and 30% Design Criteria submitted to DWR-DSOD and copied to CPM |
| WATER-05(b) | The project owner shall provide evidence of payment to DWR-DSOD of all fees required under the Dam Safety Program Requirements within 10 days of payment or any alternate funding agreement executed between the project owner and DWR-DSOD. | Provide evidence of payment to the CPM | within 10 days of payment | | | 6/10/2026 | | 6/10/26: Strachan Consulting submitted proof of payment to CPM |

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|--|--|---|---|------------------|---|---|--------------------------------|---|
| WATER-06 | Delegation to Department of Water Resources Division of Safety of Dams. The CEC delegates compliance and design verification for the dam safety related construction inspection of the HC-reservoir embankment and related dam safety components approved by the CEC, to the DWR-DSOD, with ongoing guidance from the CPM. Such delegation will be memorialized in a memorandum of understanding between the CEC and DWR-DSOD to detail the responsibilities of the agencies and project owner pursuant to WATER-5, WATER-6, and the Dam Safety Program. | Compliance and design verification for the hydrostatic compensation reservoir system is delegated to the DWR-DSOD inspection team with guidance from the CPM, who will be communicating approvals to the project owner. | Ongoing during design and construction | | Complete | 4/27/2026 | | 4/27/26: Application for Dam Construction Permit, 30% Plan Set, and 30% Design Criteria submitted to DWR-DSOD and copied to CPM |
| WATER-07 | The project owner shall enter into a water agreement with AVEK. Total water use during the 5-year construction period shall not exceed 1,400 acre-feet (AF). During project construction, the MCR shall include a summary of monthly water use. | The project owner shall submit to the CPM any correspondence with the AVEK concerning construction and operations water supply. This shall include the water agreement with AVEK. | Within 10 days or its mailing or receipt | Hydrostor | Submitted | 2/20/2026 | | 2/20/26: LL email to CPM provided AVEK Water Services Agreement. |
| WORKER SAFETY-01 | 1. Construction Personal Protective Equipment Program | Submit the Project Construction & Safety Plan to the CPM for review and approval. | At least 90 days prior to the start of construction | WSP | Submitted | 3/25/2026 Rev0 6/9/2026 Rev1 Final | | 3/25/26 Submitted by WSP to the CEC. 5/4/26: Comments provided by DCBO 6/9/226: Rev1 Final submitted by WSP to CPM |
| WORKER SAFETY-01 | 2. Construction Exposure Monitoring Plan | Submit the Project Construction & Safety Plan to the CPM for review and approval. | At least 90 days prior to the start of construction | | | | | |

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|--|--|---|---|------------------|---|--|--------------------------------|---|
| WORKER SAFETY-01 | 3. Construction Injury & Illness Prevention Program | Submit the Project Construction & Safety Plan to the CPM for review and approval. | At least 90 days prior to the start of construction | WSP | Submitted | 4/15/2026 Rev 0 6/9/2026 Rev1 Final | | 4/15/26 Submitted by WSP to the CEC. 5/4/26: Comments provided by DCBO 6/9/226: Rev1 Final submitted by WSP to CPM |
| WORKER SAFETY-01 | 6. Construction Emergency Action Plan | Submit to the KCFD for review and comment, then submit to the CPM for approval. | At least 90 days prior to the start of construction | WSP | Submitted | 4/15/2026 Rev0 6/9/26 Rev1 Final | | 4/15/26 submitted by WSP to Co. Fire; 4/15/26 submitted by WSP to CEC 5/4/26: Comments provided by DCBO 5/5/26: KCFD provides written comments 6/9/26: Rev1Final submitted by WSP to CPM |
| WORKER SAFETY-01 | 7. Construction Emergency Response Plan | Submit to the KCFD for review and comment, then submit to the CPM for approval | At least 90 days prior to the start of construction | WSP | Submitted | 4/15/2026 | | 4/15/26 submitted by WSP to CEC and KCFD; 5/4/26: Comments provided by DCBO and documented in NV5 Weekly Status Report of 5/7/2026 5/5/26: KCFD provides written comments |
| WORKER SAFETY-01 | 8. Haz. Material Business Plan | Submit to the KCFD for review and comment, then submit to the CPM for approval. | At least 60 days prior to the start of construction (HAZ-1) | WSP | 5/23/2026 | | | 3/27/26: CPM email approving compliance verification for this plan to be under HAZ-1 |
| WORKER SAFETY-01 | 9. Spill Prevention, Control and Countermeasure Plan | Submit the Project Construction & Safety Plan to the CPM for review and approval. | At least 60 days prior to the start of construction (HAZ-1) | WSP | 5/23/2026 | | | 3/27/26: CPM email approving compliance verification for this plan to be under HAZ-1 |

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|--|--|--|--|------------------|---|---------------------------------------|--------------------------------|--|
| WORKER SAFETY-01 | 11. Construction Fire Prevention Plan that includes thoroughly detailed Fire Detection and Suppression Plans for surface construction activities, Emergency Rescue Plans for surface construction, and methods of access for emergency responders through locked gates at the surface. | Submit to the KCFD for review and comment, then submit to the CPM for approval | At least 90 days prior to the start of construction | WSP | Submitted | 4/15/2026 | | 4/15/26 submitted by WSP to CEC. and KCFD 3/16/26: CPM email approves construction phasing for this condition 5/5/26: KCFD provides written comments 5/4/26: Comments provided by DCBO and documented in NV5 Weekly Status Report of 5/7/2026 |
| WORKER SAFETY-01 | Request comments on the Project Construction and Safety Plan from KCFD and KCSO. | Provide the CPM with a copy of letters requesting comments from KCFD and KCSO. | At least 90 days prior to the start of construction | WSP | 4/23/2026 | | | |
| WORKER SAFETY-01 | Submit to the CPM any written responses sent to KCFD and KCSO | Provide to the CPM copies of written responses. | Within 30 days of receipt | WSP | TBD | | | |
| WORKER SAFETY-03 | Provide the name and contact info for the Construction Safety Supervisor. | Submit the CSS info to the CPM. | At least 30 days prior to the start of site mobilization | Hatch | 6/1/2026 | | | |
| WORKER SAFETY-04 | Provide for the services of a Safety Monitor from an independent company not affiliated with the DCBO. | Provide to the CPM proof of the agreement to fund the Safety Monitor services. | At least 60 days prior to the start of construction | Hydrostor | 6/22/2026 | | 3/16/2026 | Approval documented in 5/7/26 DCBO Weekly Status Report to HDS Project Management Team |
| WORKER SAFETY-06 | Prepare and submit a Sampling and Analysis Plan | Submit the plan to the CPM for review and approval. | At least 60 days prior to the start of construction | WSP | 5/23/2026 | | | |
| WORKER SAFETY-07 | Develop and implement a Valley Fever Prevention and Response Plan that includes an enhanced Dust Control Plan per AQ-SC3. | Provide the plan to the CPM for review and approval. | At least 60 days prior to the start of site mobilization | WSP | Submitted | 3/24/2026 Rev0 6/9/2026 Rev1 | | Rev0 to CPM on 3/24/26. 5/4/26: Comments provided by DCBO Status Report of 5/7/2026 Rev1 to CPM on 6/9/26 |

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|---|---|--|--|------------------|---|-----------------------------------|--------------------------------|--------------|
| WORKER SAFETY-10 | Ensure that a portable AED is on site during construction and implement a program to ensure workers are properly trained in its use | Provide proof that a portable AED is on site with a copy of training and maintenance program for review and approval. | At least 30 days prior to start of site mobilization | Hatch | 6/1/2026 | | | |
| WORKER SAFETY-12 | Reach an agreement with KCFD regarding funding to mitigate for direct and cumulative project-related impacts or fund a fully equipped Urban Search & Rescue Unit. | Provide a copy of the agreement to the CPM for review and approval OR documentation that a letter of credit has been provided to KCFD. | At least 30 days prior to start of site mobilization | Hydrostor | 9/8/2026 | | | |

ATTACHMENT B:
Condition Verification Language Changes

WORKER SAFETY-1:

Verification: At least 90 days prior to the start of construction, the project owner shall submit to the CPM for review and approval a copy of the following plans as part of the Project Construction and Safety and Health Program: a Construction Personal Protective Equipment Program; a Construction Injury and Illness Prevention Program; a Construction Emergency Action Plan; an Emergency Response Plan; and a Construction Fire Prevention Plan for aboveground activities. The Hazardous Material Business Plan (HMBP) and Spill Prevention, Control and Countermeasure Plan (SPCC) will be submitted pursuant to Condition HAZ-1

At least 90 days prior to the start of cavern construction, the project owner shall submit to the CPM for review and approval: the Construction Exposure Monitoring Plan, Mining Safety & Health Plan, a Rock Crusher Safety Program; a Concrete Batch Plan Safety Program; and a Construction Fire Protection Plan for underground activities.

At the same time the plans are submitted to the CPM, the project owner shall also provide to the CPM a copy of the letters requesting comments submitted to KCFD and Kern County Sheriff's Office (KCSO). Written responses from the KCFD and KCSO, if any, detailing resolved comments shall be submitted to the CPM within 30 days of receipt

WORKER SAFETY-11:

Verification: At least 60 days prior to the starting of construction, the project owner shall provide all the information required for Items 3, 5, and 7 above to the KCFD for review and comment, to the CPM for review and approval, and to the DCBO for plan check approval and construction inspection.

At least 60 days prior to the starting of cavern construction, the project owner shall provide all the information required for Items 6, 8 and 9 above to the KCFD for review and comment, to the CPM for review and approval, and to the DCBO for plan check approval and construction inspection. The project owner shall also schedule, after consultation and agreement of all parties involved, the pre-cavern construction and excavation conference at least 60 days prior to the start of cavern excavation and shall give the CPM at least 30 days written notice of the meeting.

At least 60 days prior to commissioning, the project owner shall provide documentation demonstrating that the remote fire or heat sensors at sufficient locations to cover the entire facility (Item 2) have been installed.

At least 60 days prior to project operations, the project owner shall also provide a letter to the CPM stating that the KCFD, CHP, and KCSO have been given access to the Knox boxes (Item 1) and affirming that the closed-circuit television cameras (Item 4) have been installed.