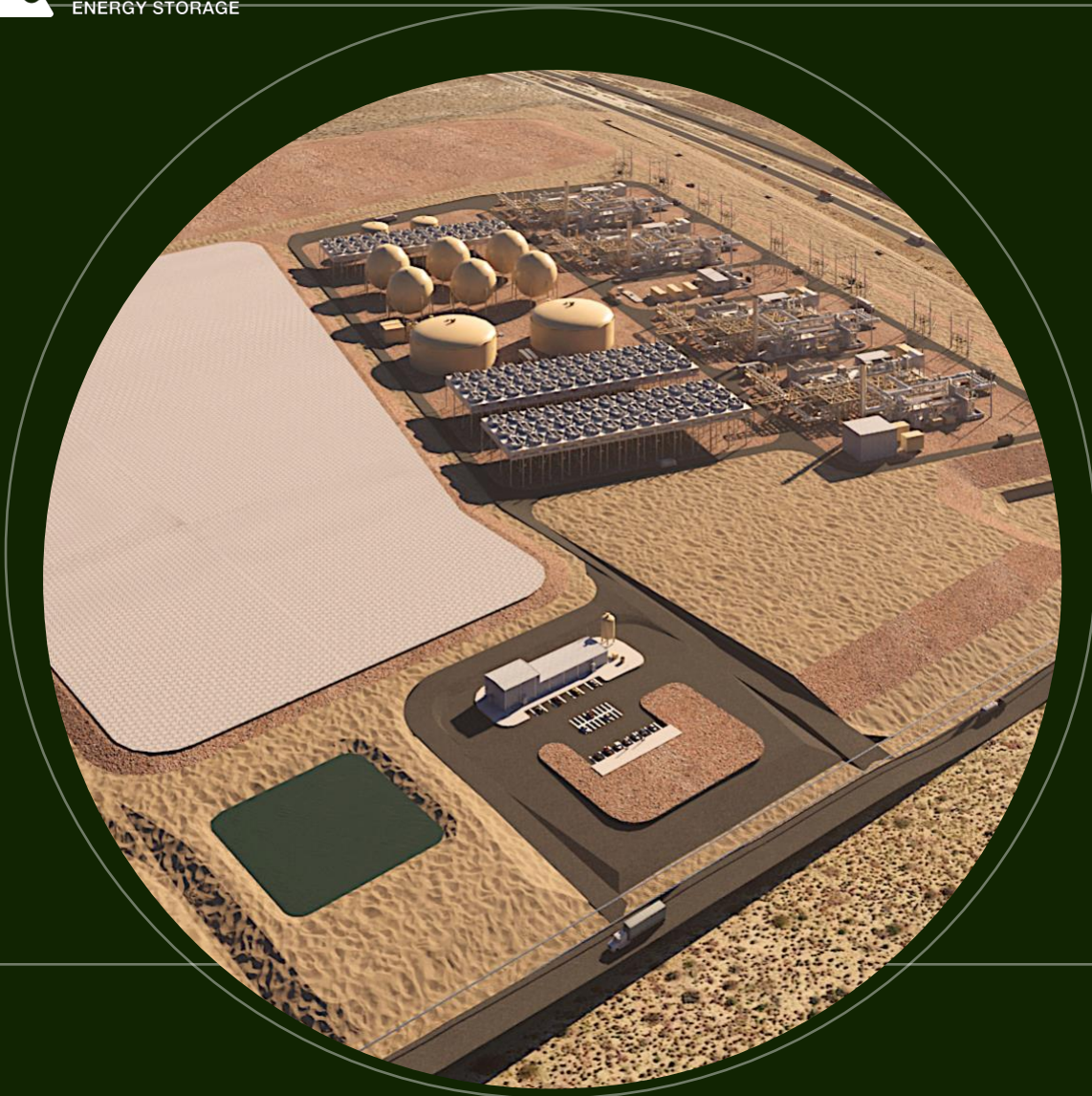


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WILLOW ROCK
ENERGY STORAGE



July 2026

Monthly Compliance Report #5

Willow Rock Energy Storage Center 21-AFC-02C

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

Monthly Compliance Report #5

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 fifth MCR for the WRESC Project. It covers Project activities from June 1 – 30, 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 B)
- 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 A);
- 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. Contract negotiations with the contractor for the construction of the gen-tie line are in the final stages, with a target to award in mid-July.

Environmental Compliance Update. 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. Biological clearance surveys are scheduled to begin in early July.

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 the "Early Works" area site activities and are identified in Table 1, Key Events Schedule. Activities in other areas of the site which will begin after the initiation of the Early Works activities, are referred to as the "Later Works" area and are also identified in Table 1.

On June 30, 2026, GEM LLC provided the CEC with a description of Pre-Construction Activities it intends to conduct in mid-July. These activities include trash removal, Western Joshua Tree (WJT) relocation; installation of Desert Tortoise fencing in the Early Works Area, and temporary placement of trailers. These activities are identified as Pre-Construction Activities since they do not meet the definition of "Construction" pursuant to Public Resources Code Section 25105 because they do not involve the installation of permanent equipment or structures.¹ The ground disturbing activities are limited as described in the June 20 documentation submitted to the CEC, do not involve heavy earthmoving equipment, and are not made in preparation for installation of permanent equipment or structures associated with the WRESC as certified. Completion of the Pre-Construction Activities would take approximately three weeks.

¹ **Section 25105. Construction** "Construction" means onsite work to install permanent equipment or structure for any facility. * * *"
(Emphasis added.)

Conducting the Pre-Construction Activities beginning in July 20, enables the need for the Notice to Proceed to be pushed back to August 14, 2026. This additional time will enable GEM LLC to complete all the required pre-construction condition compliance requirements prior to that date.

Engineering, Procurement, and Construction Update. Engineering activities during the reporting period focused on the Early Works scope. Bids were received from contractors for the Early Works contract and are being evaluated. The Project is looking to award the Early Works contract in July 2026. Initial technical engagement meetings were held with the Delegate Chief Building Official (“DCBO”) for the Early Works scope. Hatch continued development of detailed engineering for the Early Works and has submitted further packages for review by the Delegate DCBO. During a meeting with the DCBO on June 24, Hatch and WSP familiarized the DCBO team with the current state of the design along with upcoming submissions. The following engineering activities occurred during the reporting period:

- Finalized the site layout for the Early Works scope.
- Issued Civil Specifications package for DCBO review
- Issued DT fencing details for construction and DCBO review
- Site clearing and grubbing drawings are under preparation
- Progressed Dawn Road design (plans and profiles)
- Progressed stormwater management design, including hydrologic assessment, external open-channel sizing, Dawn Road culvert sizing, and stormwater pond sizing.
- Issued Rev 1 of Civil Design Criteria
- Progressed development of the Early Works drainage erosion and sediment control plan (DESCP).
- Issued updated Yeh Geotechnical report to address comments by DCBO

During the reporting period, Hydrostor hosted two open house events in Kern County (one in Rosamund and one in Bakersfield) to engage with local suppliers and contractors to support construction of the WRESC. Event participants included heavy civil and generator contractors, electrical and mechanical trades, and engineering and EPC firms that support the delivery of large-scale infrastructure projects. Further information on the open house events can be found [here](#).

4. Key Events Schedule

An updated 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 & PREC-CONSTRUCTION ACTIVITIES	
Start Preliminary Site Assessments (ALTA Survey)	March 2026
Start Biological Surveys	April 2026
Start Trash Removal, WJT Relocation, Desert Tortoise Fencing, Temporary Trailer Placement	July 20, 2026
SITE MOBILIZATION & CONSTRUCTION: EARLY WORKS	
Obtain NTP from CEC CPM	August 14, 2026
Start Site Mobilization	August 17, 2026
Start Dawn Road Improvements	August 24, 2026
Start Grading (subsurface area, laydown, parking, internal roads)	August 24, 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

Event Description	Date
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 August 14, 2026, so that site mobilization can begin on August 20, 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 June 30 meeting was held in person at the CEC’s office in Sacramento. 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 are now being held between the DCBO and GEM LLC during intervening weeks between the CPM coordination meetings. During the reporting period there were several meetings held with the DCBO, including in-person meetings in San Diego on June 23 and 24. GEM LLC appreciates the CPM and CEC Staff willingness and ability to communicate more frequently and in person as the Project moves forward.

Compliance. The pre-construction compliance matrix was updated during the reporting period to reflect the updated Key Events Schedule discussed in Section 4 above. In addition, 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 B. 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 July 10th, 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
AQ-SC1	AQCMM Resume	June 26, 2026		July 3, 2026
AQ-SC2	AQCMP	June 29, 2026		July 3, 2026
AQ-SC3	Item 17: Project Sign	July 7, 2026		July 9, 2026
BIO-1	Resume of Glen Kinoshita, Desert Biologist	July 9, 2026		
BIO-3	Training Notification from Designated Biologist	July 8, 2026		
BIO-5	WEAP Revised WEAP	May 29, 2026; July 2, 2026	June 12, 2026; July 8, 2026	
BIO-5	Sticker for WEAP	June 3, 2026	June 12, 2026	
BIO-6	BRMIMP Pre-Construction Aerial Photos	May 28, 2026; July 1, 2026	June 17, 2026	
BIO-7	Wildlife Protection and Relocation Plan Revised Wildlife Protection and Relocation Plan Revised Wildlife Protection and Relocation Plan #2	June 25, 2026; July 1, 2026 July 9, 2026	June 29, 2026; July 6, 2026	July 10, 2026

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
BIO-8	Vegetation Management Plan	June 22, 2026	July 1, 2026	
BIO-9	Integrated Weed Management Plan	May 28, 2026	June 12, 2026	
BIO-10	Invasive Species Management Plan	May 20, 2026	June 19, 2026 & June 24, 2026	
BIO-11	Special Status Plants Annual Survey Plan	May 6, 2026;	May 22 & June 19, 2026	June 26, 2026
	Special Status Plants Annual Survey Plan	June 23, 2026		
BIO-12	Western Joshua Tree Relocation Plan	May 1, 2026, with site visits on May 7 and May 8;	CEC & CDFW comments May 22	
	Revised WJT Relocation Plan	June 22, 2026	July 6, 2026	
	Revised WJT Relocation Plan #2	July 10, 2026		
BIO-13	Crotch's Bumble Bee Mortality Reduction and Relocation Plan;	May 13, 2026	June 19, 2026	
	Request for Variation to Survey Timing	July 7, 2026	July 8, 2026	
	Revised Crotch's Bumble Bee Mortality Reduction and Relocation Plan	July 8, 2026		
BIO-16	Raven Management Plan	May 20, 2026	June 2, 2026	
	Revised Raven Management Plan	June 24, 2026	June 26, 2026	
	Revised Raven Management Plan #2	July 10, 2026		

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
BIO-16	Desert Tortoise Fencing Specification	June 25, 2026		
BIO-17	Nesting Bird Survey Plan Revised Nesting Bird Plan	May 21, 2026 June 30, 2026	June 16, 2026 July 9, 2026	
BIO-19(a)	Burrowing Owl Mortality Reduction and Replacement Plan	June 30, 2026	July 8, 2026	
BIO-19(b)	BUWO Observation Notice follow-up	June 9, 2026		June 10, 2026
CIV-1	Drainage spec pkg to DCBO	June 26, 2026	July 10, 2026	
COM-4	MCR #4	June 10, 2026		Ongoing
COM-13	Emergency Response Site Contingency Plan	June 2, 2026	June 22, 2026	
CUL/TRI-1	CRS/CRM/Tech. Specialist Qualifications Correspondence with Tribes	Additional CRS (Clint Helton) Qualifications submitted May 31, 2026; Letter confirming CRS Available submitted June 30, 2026 July 6, 2026	April 22, 2026,	May 4, 2026 (Approval for all but two CRMs)
CUL/TRI-4	WEAP Revised WEAP	May 29, 2026; July 2, 2026	June 22, 2026	
CUL/TRI-4	Sticker for WEAP	June 3, 2026		
CUL/TRI-5	Notification to CPM and Tribes of Construction Start Date	July 6, 2026		
GEN-2	Master Drawing List and Schedule	June 30, 2026		July 1, 2026 by DCBO

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
GEN-5	Design Engineer	June 9, 2026		June 10, 2026 by DCBO
GEO-1	Final GeoTech Report	6/24/26 to DCBO and CPM	DCBO July 10, 2026	
HAZ-1	Construct HMBP	6/24/26 to DCBO and CPM		
HAZ-1	SPCC	6/30/26 to DCBO and CPM	July 2, 2026 minor edit	July 2, 2026 conditionally approved
HAZ-6	Soils Management Plan	To CPM on May 26, 2026 To Kern County on May 27, 2026;	June 2, 2026	
	Revised Soil Mgmt Plan	June 23, 2026	June 26, 2026	
HAZ-7	Resume of Qualified Environmental Professional	July 6, 2026		
LAND-1	Laydown/Parking Info for Kern County	June 29, 2026 submitted to Kern County		
LAND-2	Construction Site Plan	June 16, 2026 to CEC; June 19, 2026 to Kern Co.		
NOISE-1	Letter to Residents w/in mile of site	July 10, 2026		
NOISE-3	Construction Employee Noise Program	June 25, 2026		June 26, 2026
NOISE-6	Construction Noise Restriction Letter	June 28, 2026		
PAL-2	Maps & Drawings for PRS	July 10, 2026		
PAL-3	PRMIMP	June 30, 2026	July 8, 2026	
PAL-4	WEAP	May 29, 2026;		June 29, 2026
	Revised WEAP	July 2, 2026		

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
PAL-4	Sticker for Worker Environmental Awareness Plan	June 3, 2026		June 29, 2026
PB-1	Construction Sales and Use Taxes	June 25, 2026		
PH-1	Valley Fever Mgmt Plan	June 24, 2026		
SOCIO-1	Letter re: Contractors hiring locally	May 26, 2026		June 22, 2026
SW-1	Construction Waste Mgmt Plan	June 25, 2026	July 1, 2026 minor edit	July 3, 2026 conditionally approved
TRANS-1	Construction Traffic Management Plan	June 24, 2026 June 28, 2026 to Kern Co., CALTRANS		July 8, 2026 conditionally approved
VIS-2	Project Sign	July 7, 2026		July 9, 2026
WATER-2	WDRs, Submittal of Information and Applicable Fees	May 26, 2026		June 29, 2026
	Correspondence with RWQCB	July 6, 2026		N/A
WATER-5	Payment to DWR-DSOD	June 10, 2026		
WATER-7	AVEK Agreement	Provided February 20, 2026; Formally filed June 26, 2026		
WORKER SAFETY-1	Construction PPE Program	March 25, 2026;	CEC & DCBO Comments received 5/5/2026	DCBO approved 6/29/26
	Revised Construction PPE Program	June 9 2026		
WORKER SAFETY-1	Construction Injury and Illness Prevention Program	April 15, 2026;	CEC & DCBO Comments received 5/5/26	DCBO approved 6/29/26
	Revised I&IPP	June 9, 2026		

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
WORKER SAFETY-1	Construction Emergency Action Plan	April 15, 2026;	County Fire, CEC & DCBO Comments 5/5/26	
	Revised EAP	June 9, 2026;	DCBO June 29, 2026	
WORKER SAFETY-1	Construction Emergency Response Plan	April 15, 2026	County Fire, CEC & DCBO Comments received 5/5/26	DCBO approved June 23, 2026
	Revised ERP	June 9, 2026		
WORKER SAFETY-1	Construction Fire Protection Plan	April 15, 2026	County Fire, CEC & DCBO Comments received 5/5/26	Conditional DCBO approved June 22, 2026
	Revised FPP	June 22, 2026		
WORKER SAFETY-3	Construction Safety Supervisor	June 25, 2026		
WORKER SAFETY-6	Sampling and Analysis Plan	June 24, 2026	6/29/26	
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	June 26, 2026
WORKER SAFETY-10	AED	JULY 10, 2026		
WORKER SAFETY-12	Funding Mitigation for Kern County Fire Department	July 7, 2026		July 8, 2026

6. Status of Delayed Submittals

Conducting the Pre-Construction Activities beginning July 20, 2026, enables the need for the Notice to Proceed to be pushed back to August 14, 2026. This additional time will enable GEM LLC to complete all the pre-construction compliance requirements prior to that date.

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 A of this MCR.

During the reporting period, the DCBO agreed to the following Verification timing modifications for the following the Facility Design conditions:

- Civil-1: The Verification timing was modified from prior to site grading to prior to the start of the October 1, 2026 rainy season for the Early Works area and 15 days prior to start of site grading for the Later Works area.
- GEN-2: The Verification timing was modified to add the timing for when Later Works area packages should be submitted.
- GEN-4: The Verification timing was modified to better reflect when the resume for the Resident Engineer is needed.
- GEN-5: The Verification timing was modified to better reflect when the resumes for the engineers are needed.

The full text of the CoCs with the Verification language changes consistent with the DCBO's verification approvals are included in Attachment A 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-14: Disturbance Acreage for the Project	June 10, 2026
	BIO-14: CPM Issued Memo Summarizing CPM Revision of Required Security Deposit based on Reduced Acreage	June 29, 2026

Government Agency	File/Permit/Engagement	Date
	BIO-14: Joint CEC/CDFW/GEM LLC Virtual Meeting to Review Basis for Revised Security Deposit	July 7, 2026
	BIO-16 Revised Raven Management Plan	June 24, 2026
Kern County Department of Planning and Natural Resources	The Kern County Department of Planning and Natural Resources requested that GEM LLC prepare a compliance binder which includes submittals to the Planning and Natural Resources Department, as well as other County departments to which compliance submittals are sent. During the reporting period, the compliance binder was updated with compliance submittals provided to the Kern County Fire Department, and Public Health Services Department – Hazardous Materials. In addition, information on WRESC laydown areas, parking, and the entity which will accept the excavated rock (LAND-1) and the Construction Site Plan (LAND-2) were submitted to the Planning and Natural Resources Department for review and comment. Lastly the Planning and Natural Resources Department determined that the sign required by Conditions AQ-SC3 and VIS-2 is exemption from Kern County Zoning Ordinance Section 19.84.140.	June 4, 2026; June 19, 2026; June 29, 2026 July 9, 2026
California Environmental Reporting System (Kern County CUPA)	HAZ-1 Hazardous Materials Business Plan information was uploaded to the California Environmental Reporting System SPCC Plan submitted to Department of Public Health Services – Hazardous Materials	June 22, 2026 June 30, 2026
Kern County Public Works Department	The Trans-1 Traffic Management Plan was submitted to the County for review and comment. The Trans-2 Encroachment Permit Application was submitted for approval.	June 26, 2026 July 6, 2026
CalTrans	The Trans-1 Traffic Management Plan was submitted to the County for review and comment.	June 26, 2026
California Highway Patrol	The Trans-1 Traffic Management Plan was submitted to the County for review and comment.	June 26, 2026
Kern County Public Health Services Department – Hazardous Materials	Email sent to Waqar Rustam with the Kern County Public Health Services Department – Hazardous Materials providing project information and asking for written documentation if they Department is not going to review the Soil Management Plan provided on May 27, 2026.	June 28, 2026

Government Agency	File/Permit/Engagement	Date
Kern County Fire Department	The KFCDD provided email correspondence stating that is had not further comments on the ERP, EAP, FPP, and no comments on the Hazardous Materials Business Plan	7/8/26

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 July 2026.

- BIO-5 Revised WEAP
- BIO-6 BRMIMP
- BIO-8 Final Vegetation Management Plan
- BIO-14 Security/Letter of Credit
- BIO-16 Proof of Payment, Raven Fund
- BIO-24 Updated JD Waters Report/Grading Plans
- CUL/TRI-3 CTRMMP
- CUL/TRI-4 Revised WEAP
- HAZ-6 Revised Soil Management Plan
- WATER-1 DESCP
- BIO-9: Final Integrated Weed Management Plan
- BIO-10: Final Invasive Species Management Plan

In addition, pre-construction activities will be conducted on site, including removal of trash, relocation of Western Joshua trees, installation of Desert Tortoise Fencing, and placement of project trailers in their temporary locations. Early Works construction activities are also scheduled to begin which includes Dawn Road improvements and grading of the subsurface area, laydown area, parking area, and internal roads

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:

Approved Condition Verification Language Changes

Worker Safety CEC Staff Approved Verification 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.

Facility Design Conditions DCBO Approved Verification Changes

CIVIL-1

The project owner shall submit to the DCBO for review and approval the following:

1. Design of the proposed drainage structures and the grading plan;
2. An erosion and sedimentation control plan;
3. Related calculations and specifications, signed and stamped by the responsible civil engineer; and
4. Soils, geotechnical, or foundation investigations reports required by the 2022 Building Code.

Verification: At least ~~45~~15 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of the October 1, 2026 rainy season for the Early Works area as defined in Table 1 of MCR No. 4, site grading and 15 days prior to start of site grading for the Later Works area, as defined in Table 1 of MCR No. 4, the project owner shall submit the documents described above to the DCBO for design review and approval. In the next MCR following the DCBO's approval, the project owner shall submit a written statement certifying that the documents have been approved by the DCBO.

GEN-2

Before submitting the initial engineering designs for DCBO review, the project owner shall furnish the CPM and the DCBO with a schedule of facility design submittals, and master drawings and master specifications list. The master drawings and master specifications list shall contain a list of proposed submittal packages of designs, calculations, and specifications for major structures, systems, and equipment. Major structures, systems, and equipment are structures and their associated components or equipment that are necessary for energy storage and/or power production, costly or time consuming to repair or replace, are used for the storage, containment, or handling of hazardous or toxic materials, or could become potential health and safety hazards if not constructed according to applicable engineering LORS. The schedule shall contain the date of each submittal to the DCBO. To facilitate audits by the CEC staff, the project owner shall provide specific packages to the CPM upon request.

Verification: At least 60 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of Early Works rough grading for the Early Works packages and 60 days prior to rough grading for the Later Works packages (or a project owner and DCBO mutually agreed upon alternative time frame), the project owner shall submit to the DCBO and to the CPM the schedule, and the master drawings and master specifications list of documents to be submitted to the DCBO, for review and approval. These documents shall be the pertinent design documents for the major structures, systems, and equipment defined above in Condition of Certification **GEN-2**. Major structures, systems, and equipment shall be added to or deleted from the list only with CPM approval. The project owner shall provide schedule updates in the monthly compliance report (MCR).

GEN-4

Prior to the start of rough grading, the project owner shall assign a California-registered architect, or a structural or civil engineer, as the resident engineer in charge of the project.

The resident engineer may delegate responsibility for portions of the project to other registered engineers. Registered mechanical and electrical engine may be delegated responsibility for mechanical and electrical portions of t project, respectively. A project may be divided into parts, provided that each part is clearly defined as a distinct unit. Separate assignments of general responsibility may be made for each designated part.

The resident engineer shall:

1. Monitor progress of construction work requiring DCBO design revie and inspection to ensure compliance with LORS;
2. Ensure that construction of all facilities subject to DCBO design review and inspection conforms in every material respect to applicable LOR these Conditions of Certification, approved plans, and specifications
3. Prepare documents to initiate changes in approved drawings and specifications when either directed by the project owner or as required by the conditions of the project;
4. Be responsible for providing project inspectors and testing agencies with complete and up-to-date sets of stamped drawings, plans, specifications, and any other required documents;
5. Be responsible for the timely submittal of construction progress rep to the DCBO from the project inspectors, the contractor, and other engineers who have been delegated responsibility for portions of the project; and
6. Be responsible for notifying the DCBO of corrective action or the disposition of items noted on laboratory reports or other tests when they do not conform to approved plans and specifications.

The resident engineer (or their delegate) must be located at the project site or be available at the project site within a reasonable time, during any hours in which construction takes place.

The resident engineer shall have the authority to halt construction and to require changes or remedial work if the work does not meet requirements.

If the resident engineer or the delegated engineers are reassigned or replaced, the project owner shall submit the name, qualifications, and registration number of the newly assigned engineer to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer.

Verification: At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of Later Works rough grading, the project owner shall 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. The project owner shall notify the CPM of the DCBO's approvals of the RE and other delegated engineer(s) within five days of the approval.

If the resident engineer or the delegated engineer(s) is subsequently reassigned or replaced, the project owner shall within five days submit the name, qualifications, and registration number of the newly assigned engineer to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer within five days of the approval.

GEN-5

Prior to the start of rough grading, the project owner shall 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. Prior to the start of construction, the project owner shall 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. (California Business and Professions Code, sections 6704, 6730, 6731, and 6736 require state registration to practice as a civil engineer or structural engineer in California.)

The tasks performed by the civil, mechanical, electrical, or design engineers may be divided between two or more engineers, as long as each engineer is responsible for a particular segment of the project (for example, proposed earthwork, civil structures, project structures, equipment support). No segment of the project shall have more than one responsible engineer. The transmission line may be the responsibility of a separate California registered electrical engineer.

The project owner shall submit to the DCBO for review and approval, the names, qualifications, and registration numbers of all responsible engineers assigned to the project.

If any one of the designated responsible engineers is subsequently reassigned or replaced, the project owner shall submit the name, qualifications and registration number of the newly assigned responsible engineer to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer.

1. The civil engineer shall:
 - a. Review the foundation investigations, geotechnical, or soils reports prepared by the soils engineer, the geotechnical engineer, or by a civil engineer experienced and knowledgeable in the practice of soils engineering;

- b. Design (or be responsible for the design of), stamp, and sign all plans, calculations, and specifications for proposed site work, civil works, and related facilities requiring design review and inspection by the DCBO. These include, but may not be limited to grading, site preparation, excavation, compaction, construction of secondary containment, foundations, erosion and sedimentation control structures, drainage facilities, underground utilities, culverts, site access roads, and sanitary sewer systems; and
 - c. Provide consultation to the resident engineer during the construction phase of the project and recommend changes in the design of the civil works facilities and changes to the construction procedures.
- 2. The soils engineer, geotechnical engineer, or civil engineer experienced and knowledgeable in the practice of soils engineering, shall:
 - a. Review all the engineering geology reports;
 - b. Prepare the foundation investigations, geotechnical, or soils reports containing field exploration reports, laboratory tests, and engineering analysis detailing the nature and extent of the soils that could be susceptible to liquefaction, rapid settlement, or collapse when saturated under load;
 - c. Be present, as required, during site grading and earthwork to provide consultation and monitor compliance with requirements set forth in the 2022 Building Code (depending on the site conditions, this may be the responsibility of either the soils engineer, the engineering geologist, or both); and
 - d. Recommend field changes to the civil engineer and resident engineer.
 - e. This engineer shall be authorized to halt earthwork and to require changes if site conditions are unsafe or do not conform to the predicted conditions used as the basis for design of earthwork or foundations.
- 3. The engineering geologist shall:
 - a. Review all the engineering geology reports and prepare a final soils grading report; and
 - b. Be present, as required, during site grading and earthwork to provide consultation and monitor compliance with the requirements set forth in the 2022 Building Code (depending on the site conditions, this may be the responsibility of either the soils engineer, the engineering geologist, or both).
- 4. The design engineer shall:
 - a. Be directly responsible for the design of the proposed structures and equipment supports;
 - b. Provide consultation to the RE during design and construction of the project;
 - c. Monitor construction progress to ensure compliance with engineering LORS;

- d. Evaluate and recommend necessary changes in design; and
 - e. Prepare and sign all major building plans, specifications, and calculations.
5. The mechanical engineer shall be responsible for, and sign and stamp a statement with, each mechanical submittal to the DCBO, stating that the proposed final design plans, specifications, and calculations conform to all of the mechanical engineering design requirements set forth in the CEC's decision.
6. The electrical engineer shall:
- a. Be responsible for the electrical design of the project; and
 - b. Sign and stamp electrical design drawings, plans, specifications, and calculations.

Verification: At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of Later Works rough grading, the project owner shall submit to the DCBO for review and approval, resumes and registration numbers of the responsible civil engineer, soils (geotechnical) engineer, and engineering geologist assigned to the project.

At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of Later Works construction, the project owner shall submit to the DCBO for review and approval, resumes and registration numbers of the responsible design engineer, mechanical engineer, and electrical engineer assigned to the project.

The project owner shall notify the CPM of the DCBO's approvals of the responsible engineers within five days of the approval.

If any one of the designated responsible engineers is subsequently reassigned or replaced, the project owner shall within five days submit the name, qualifications, and registration number of the newly assigned responsible engineer to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer within five days of the approval.

ATTACHMENT B: WRESC PRE-CONSTRUCTION COMPLIANCE MATRIX

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

KEY

MILESTONES:	Start of special status bio surveys	4/13/2026
	Start pre-construction activities	7/20/2026
	Obtain NTP for Early Works construction activities	8/14/2026
	Start Early Works site mobilization	8/17/2026
	Start grading of Dawn Rd, subsurface pad, laydown area, internal roads, and parking	8/24/2026
	Start Later Works site mobilization	10/8/2026
	Start Later Works site grading: reservoir excavation	3/1/2027
	Start of cavern construction at depth	12/1/2028

Color Codes:
Submitted to CPM
Conditional approval by CPM
Approved by 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/ 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	Complete	6/26/2026	7/3/2026	6/26/26: WSP submitted to CPM 7/3/26: CPM email approval
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	Complete	6/29/2026	7/3/2026	6/29/26: WSP submitted plan to CPM 7/3/26: CPM email approval
AQ-SC3	Item 17: Signs shall be posted at the project site entrance and written notifications shall be provided to residential land uses within 1,000 feet of the project site. The signs and written notifications shall include the following information: (a) Project Name; (b) Anticipated Construction Schedule(s); and (c) Telephone Number(s) for designated construction activity monitor(s) or, if established, a complaint hotline.	The signs and written notifications shall include the following information: (a) Project Name; (b) Anticipated Construction Schedule(s); and (c) Telephone Number(s) for designated construction activity monitor(s) or, if established, a complaint hotline.	a minimum of 30 days prior to initiation of project construction to residential land uses within 1,000 feet of the project site.	Hydrostor	Complete	7/7/2026	7/9/2026	7/7/26: Strachan Consulting emailed sign design to CPM. 7/9/26: CEC email approval
BIO-1	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	Complete	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. 4/28/26: CPM email approval

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/ Agency	Notes/Status
BIO-3(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	Complete	2/27/2026 4/22/2026	4/28/2026 for only Urquidi, West, Moreno, Williams, Bukovac, Oki 5/27/26: Bend	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.
BIO-3(b)	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	Complete	7/8/2026		7/8/26: Strachan Consulting emailed WSP letter to CPM
BIO-5	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	Complete	5/29/2026		5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed from SS to CPM 6/12/26: CPM email requesting additional information in a red-line 7/2/26: WSP emailed updated plan to CPM
BIO-6(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	Complete	5/28/2026		5/28/26 WSP emailed to CPM and CDFW 6/17/26: CPM provided email requesting additional information in a red-line version.
BIO-6(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	7/10/2026			

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/ Agency	Notes/Status
BIO-6(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	Hydostor	Complete	7/1/2026		7/1/26: WSP provided link to CPM to download photo file
BIO-6(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	8/7/2026			
BIO-7	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	Complete	6/25/2026		6/25/26: WSP emailed plan to CPM 6/29/26: CPM provided email requesting additional information 7/2/26: WSP submitted revised/red-lined plan to CPM 7/6/26: CPM provided comments and requested red-line version 7/9/26: WSP provided revised version to CPM 7/10/26: CPM email approval
BIO-8(a)	Develop a Draft Vegetation Management Plan	Provide draft VMP to the CPM for approval.	At least 45 days prior to start of site	WSP	Complete	6/22/2026		6/22/26: WSP emailed plan to CPM 7/1/26 CPM emailed comments
BIO-8(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	7/13/2026			
BIO-9(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	Complete	5/28/2026		5/28/26 WSP emailed plan to CPM 6/12/26: CPM provided email requesting additional information be provided in a red-line version
BIO-9(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	7/13/2026			

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/ Agency	Notes/Status
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	Complete	5/20/2026		5/20/26: Submitted by WSP to CPM 6/19/26: Email from A. Gutierrez requesting additional information for BIO-10 with note that CEC is requesting clarification from CDFW on Item 5. 6/24/26: CPM emailed comments
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	7/13/2026			
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	Complete	5/6/2026	6/25/2026	5/6/26: Submitted by WSP;--no speical status plants found 5/22/26: CPM provided comments 6/19/26: Email from A. Gutierrez requesting additional information for BIO-11 6/23/26: WSP submitted revied plan to CPM 6/26/26: CPM email approval.
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	WSP	Complete	5/1/2026		5/1/26: Submitted by SS 5/22/26: CPM provided comments, including those by CDFW
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	Complete	6/22/2026		6/22/26: WSP emailed updated Final Plan to CPM 7/6/26: CPM returned additional comments and requested a red-line version be returned. 7/9/26: WSP provided resume of Senior Desert Botanist 7/10/26: WSP emailed final plan 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/ Agency	Notes/Status
BIO-12(c)	Pay the WJTCA mitigation fees.	Submit the fee payment to CDFW Region 4.	Prior to any project activities that will	Hydrostor	In progress	In progress		CEC will invoice HDS upon approval of final WJT Relocation Plan
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	Complete	5/13/2026		5/13/26: Submitted by WSP 6/19/26: Email from A. Gutierrez requesting additional information for BIO-13
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	Complete	7/8/2026		7/8/26: WSP submitted final plan to CPM
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	7/1/2026			
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	8/15/2026			
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	7/5/2026			6/7/26: Meeting held with CPM
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 Protecton 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	7/15/2026			

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/ Agency	Notes/Status
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	Complete		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	7/13/2026			
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	7/20/2026			
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 take 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 CPM email approval
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	7/1/2026			
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	7/19/2026			
BIO-16(e)	If DT or active burrows are detected during pre-clearance surveys, stop work within 200 feet of	DB to contact the CPM, CDFW, and USFWS immediately for guidance.	As required	WSP	As required			

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/ Agency	Notes/Status
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	Complete	6/17/2026 6/25/26		6/3/26: Email from CEC Staff Alex Single confirmed 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. 6/25/26: Fencing specs sent to CPM 6/27/26: DT fencing specs sent to DCBO
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	Complete	5/20/2026: Draft Plan 6/24/26: Final Plan		5/20/2025: WSP emailed plan to CPM 6/2/16: Request for Additional Information received from CPM 6/24/26: WSP emailed final plan to CPM 6/26/26: CPM provided additional comments from CEC/CDFW 7/10/26: WSP emailed final 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	Complete	6/23/2026		6/23/26: CPM submitted REAT Deposit document to CDFW 6/26/26: CDFW requested revisions and resubmittal by CEC
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	8/2/2026			

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/ Agency	Notes/Status
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	Complete	5/21/2026		5/21/26: WSP emailed plan to CPM 6/16/26: CPM provided email detailing additional info in red-line format 6/30/26: WSP emailed CPM the red-line version. 7/9/26: CPM requested additional information
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	In progress			
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	8/15/2026			
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	Complete	6/30/2026		6/30/26: WSP emailed plan to CPM 7/8/26: CPM emailed comments
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	7/30/2026			

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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	7/10/2026	5/1/2026	6/10/2026	5/1/26: BUOW observation notice provided to CPM. 6/9/26: Observation Notice Followup sent to CPM from WSP. 6/10/26: CPM approval of memo and buffer reduction to 50 feet.
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	7/30/2026			
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	7/1/2026			
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	7/1/2026			
BIO-21(a)	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	7/20/2026			
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	7/30/2026			
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 reivew 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 CPM email approval

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BIO-23(b)	Prepare the pre-construction survey reports	Submit prptocol surveys and submit wrtten reports to CPM and CDFW	No more than 21 days after the survey effort is completed	WSP	7/30/2026			
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	8/10/2026			
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	WSP	TBD			
BIO-24(c)	Updated Jurisdictional Waters Report, the proposed engineering drawings for each crossing, and the hydrologic studies used to inform the	Provide to the CPM for review and approval	No less than 45 days prior to site mobilization.	WSP	7/3/2026			
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	8/10/2026			
CIVIL-1(a)	Prepare a drainage structure design and grading plan	Submit required plan to DCBO for design review and approval	At least 45 days prior to the start of Oct 1, 2026 rainy season for Early Works and 15 days prior to start of site grading for Later Works area	Hatch	Complete	4/21/2026		4/21/26: Hatch submitted partial spec pkg to DCBO 6/26/26: Hatch submitted spec package to DCBO 7/6/26: DCBO provided comments
CIVIL-1(b)	Prepare a erosion & sedimentation control plan	Submit required plan to DCBO for design review and approval	At least 45 days prior to the start of Oct 1, 2026 rainy season for Early Works and 15 days prior to start of site grading for Later Works area	WSP	8/15/2026			

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CIVIL-1(c)	Provide calcs and specs signed by Civil Engineer	Provide required plan to DCBO for design review and approval	At least 45 days prior to the start of Oct 1, 2026 rainy season for Early Works and 15 days prior to start of site grading for Later Works area	Hatch	Complete	6/26/2026		6/26/26: Hatch submitted package to DCBO
CIVIL-1(d)	Provide soils, geotech, and foundation investigation reports required by 2025 CBC.	Submit required reports to DCBO for design review and approval	At least 45 days prior to the start of Oct 1, 2026 rainy season for Early Works and 15 days prior to start of site grading for Later Works area	Hatch	8/15/2026			
COM-3	Compliance Verification Submittals	Follow submittal protocol set forth in Condition	Ongoing	Strachan	Ongoing	Ongoing		
COM-4	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 NTP 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	Ongoing		
COM-5	Prepare a Compliance Matrix that meets the specifications listed in the condition	Submit a compliance matrix with each MCR.	Monthly	Strachan	Monthly in MCR	Monthly in MCR		Updated matrix is included in each MCR.
COM-6	Prepare a Monthly Compliance Report	Submit to the CPM	Monthly	Strachan	Due by 10th of each month	7/10/2026		7/10/26: MCR#5 submitted to CPM
COM-7	Conduct a compliance kickoff meeting with Kern County Planning and Natural Resources, Fire Department, and Public Works	Submit to the CPM	Held 3/2/26 and ongoing	Hydrostor	Complete	6/26/2026		6/26/26: Strachan Consulting emailed verification to CPM

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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	6/15/2026	6/2/2026		6/2/26: WSP emailed plan to CPM
CUL/TRI-1(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	Complete	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
CUL/TRI-1(a)					Complete	5/29/2026		5/29/26: Submitted updated resume for Clint Helton
CUL/TRI-1(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	Complete	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-1(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	Complete	7/6/2026		This item is satisfied by the CUL/TRI-5 submittal made to the CPM on July 6, 2026
CUL/TRI-1(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	Complete	6/30/2026		6/30/26: Strachan Consulting submitted resumes to CPM
CUL/TRI-1(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	Complete	6/29/2026		6/29/26: Strachan Consulting submitted resumes to CPM

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CUL/TRI-2(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	Complete	7/9/2026		7/9/26: Strachan Consulting submitted Owner's letter to CPM
CUL/TRI-2(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	As required			
CUL/TRI-3(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	6/20/2026			
CUL/TRI-3(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	Complete	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-4(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	Complete	5/29/2026		5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed from SS to CPM 6/22/26: CPM provided Staff memo with comments
CUL/TRI-4(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	Complete	6/3/2026	6/3/2026	6/3/26: WEAP Training form received from CPM

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CUL/TRI-5(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	Complete			7/6/26: WSP emailed Tribal notifications to the CPM
CUL/TRI-6	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	Complete	2/27/2026	3/18/2026	3/18/26: CPM email confirmed receipt of Project Owner's letter as an approval of this condition..
GEN-2 EARLY WORKS	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 EW rough grading for the EW packages	Hatch and CMT	Complete	6/20/2026	7/1/2026	6/30/26: Strachan Consulting emailed Master Drawing & Spec Submittal List and Schedule to CPM and DCBO 7/1/26: DCBO approval.
GEN-2 LATER WORKS	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 rough grading for the LW packages	Hatch	12/31/2026			

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GEN-3	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	Complete		5/7/2026	Approval received via DCBO Weekly Status Report to HDS Project Management Team
GEN-4(a) LATER WORKS	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 the start of LW rough garding	Hatch	7/25/2026			DCBO has concurred that RE does not need to be on-site for Early Works activities
GEN-5(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 LW rough grading	Hatch/CMT	Complete	6/9/2026	6/10/2026 by DCBO	6/9/26: Strachan Consulting submitted resume of Evan Hsaio to CPM and DCBO 6/10/26: DCBO approved Mr. Hsaio; 7/10/26: DCBO confirmed Mr. Hsaio can fullfill all roles until additional staff are hired.
GEN-5(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 design engineer, mechanical engineer, and electrical engineer assigned to the project	At least 30 days prior to the start of LW construction	Hatch/CMT	7/25/2026			6/10/26: DCBO approved Mr. Hsaio as the Design Engineer
GEN-5(c)	Obtain the DCBO's approval of the assigned mechanical, electric, structural and remaining civil engineers.	Notify the CPM of the DCBO's approvals of of the responsible engineers.	Within 5 days of DCBO approval	Hatch/CMT	8/1/2026			6/10/26: DCBO concurred that mechanical, electrical, and structural engineers resumes can be tied to LW

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GEO-1	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	Complete	5/5/2026		5/7/26: DCBO provided comments 6/24/26: Final Geotech Report submitted to DCBO 6/24/26: WSP submitted final plan to CPM and DCBO 7/9/26: DCBO provided comments
HAZ-1(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	Complete	6/22/2026		6/22/26: Hydrostor uploaded plan to CERS 6/24/26 Strachan Consulting emailed to CPM and DCBO 7/7/26: Strachan Consulting submitted plan to County Fire
HAZ-1(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	Complete	6/30/2026	7/2/2026	6/30/26: WSP emailed the plan to the CPM and DCBO 6/30/36: Hydrostor emailed the Plan to KCPHSD 7/2/26 CPM conditional approval
HAZ-4	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	Complete	5/21/2026	5/23/2026	5/23/26 CPM approved plan 6/4/26: Strachan Consulting provided hard copy plan to DCBO
HAZ-6(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	Complete	5/26/2026		5/26/26 WSP emailed plan to CPM 5/26/26 Strachan Consulting emailed to Kern Co. Public Health Services. 6/2/26 CPM returned plan with comments 6/18/26: Follow-up email sent to Kern County 6/23/26: WSP submitted final plan to CPM and DCBO
HAZ-6(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	6/5/2026	5/27/2026		5/23/26: WSP submitted to CPM 6/23/26: CPM provided written comments (4 items)

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HAZ-7	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	Complete	7/6/2026		7/6/26: WSP submitted to CPM
LAND-1	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	7/25/2026			6/29/26: Common Sense provided to Kern Co Planning and Natural Resources Dept.
LAND-2(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 review and approval.	At least 60 days prior to any grading or development for earlu works permanent project facilities	Hatch/ Hydrostor	Complete	6/16/2026		6/16/26: Emailed to CPM by Strachan Consulting 6/23/26: Submittal provided to Esther Villa with Kern Co Planning & Natrual Resources Dept. 6/24/26: Strachan Consulting informed CPM that site plan was hand delivered to KC on 6/23/26.
LAND-2(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	7/25/2026			

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NOISE-1	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	Complete	7/10/2026		7/10/26: Strachan Consulting emailed to the CPM
NOISE-3	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	Complete	6/25/2026	6/26/2026	6/25/26: WSP submitted plan to CPM 6/26/26 CPM email approving plan
NOISE-6	Limit the use of heavy equipment operations and noisy construction work to the hours specified in the Condition. NOTE: on 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.	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	Complete	6/28/2026		6/28/26: Strachan Consulting emailed letter to CPM
PAL-1(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	Complete	2/27/2026	3/19/2026	3/19/26: CPM email approval
PAL-1(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	Complete	2/27/2026	3/19/2026	3/19/26: CPM email approval

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PAL-2	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	Complete	7/10/2026		3/5/26 CEC agreed that plans can be submitted sequentially with construction phasing. (See Laurel Lees 3/5/26 meeting summary email). 7/10/26: CEC emailed submittal to CPM and PRS for review & approval
PAL-3	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	Complete	6/30/2026		6/30/26: WSP submitted to CPM
PAL-4	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 3 days prior to ground disturbance	WSP	Complete	5/29/2026	6/29/2026	5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed from Strachan to CPM 6/29/26 CPM emailed approval
PUBLIC BENEFITS-1	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	Complete	6/25/2026		6/25/26 Strachan Consulting emailed letter to CPM
PUBLIC HEALTH-1	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	Complete			6/24/26: WSP emailed plan to CPM

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SOCIO-1	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	6/22/2026	5/26/26: Letter from Noah Eckert to CPM 6/22/26: CPM email approval
SOCIO-2	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	7/15/2026			
SOLID WASTE-1	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	Complete	6/25/2026		6/25/26: WSP emailed plan to CPM 7/3/26 Condition approval received
TRANS-1(a)	Prepare a Construction Traffic Management Plan	Submit the plan to the CPM along with copies of the transmittal letters sent to Kern County, Caltrans, and CHP for review and comment	At least 60 days prior to the start of construction	WSP	Complete	6/24/2026		6/24/26: WSP emailed plan to CPM 6/26/26: WSP emailed plan to Kern County, Caltrans, and the CHP; copies of letters emailed to CPM
TRANS-1(b)	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	Complete	6/28/2026		6/28/26: Strachan Consulting emailed copies of agency transmittal letters to CPM.
TRANS-2(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	8/4/2026			

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TRANS-2(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	8/14/26			
TRANS-2(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	7/30/2026			
VIS-2	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	Complete	7/7/2026	7/9/2026	7/6/26: Strachan Consulting has inquired with Esther Villa if sign is exempt from County Zoning Ordinance sign requirements. 7/7/26: Strachan Consulting emailed design to CPM 7/9/26 KC Planning confirmed sign is exempt from County ordinance 7/9/26: CPM email approval
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	8/17/2026			
WATER-1	Prepare a Drainage Erosion and Sedimentation Control Plan (DESCP) for managing stormwater during Project construction	Submit the DESCP 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	7/25/2026			

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WATER-2	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	Complete	5/26/2026	6/29/2026	5/26/26 Letter from Noah Eckert to CPM 6/29/26 CPM email approval 6/6/26 Strachan Consulting emailed additional correspondence to CPM
WATER-5(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-5(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	Hydrostor	Complete	6/10/2026		
WATER-6	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	Hydrostor	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

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WATER-7	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	Complete	2/20/2026		2/20/26: LL email to CPM provided agreement; 6/26/26: Strachan Consulting submitted formally for compliance record.
WORKER SAFETY-1	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	Complete	3/25/2026 Rev0 6/9/2026 Rev1 Final	6/29/2026	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 6/19: Rev1 Final submitted to CBO by Strachan Consulting 6/29/26 DCBO approved
WORKER SAFETY-1	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	Complete	4/15/2026 Rev 0 6/9/2026 Rev1 Final	6/29/2026	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 6/19: Rev1 Final submitted to DCBO by Strachan 6/29/26: DCBO approved

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WORKER SAFETY-1	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	Complete	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 and KCFD 6/29/26: DCBO provided comments
WORKER SAFETY-1	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	Complete	4/15/2026	6/23/2026	4/15/26 submitted by WSP to CEC and KCFD; 5/4/26: Comments provided by DCBO 5/5/26: KCFD provides written comments 6/11/26: WSP submitted Rev 1 Final ERP to CPM & Co. Fire 6/19: Rev1 Final submitted to CBO by Strachan Consulting 6/23/26 DCBO approved
WORKER SAFETY-1	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	WSP	Complete			6/22/26: Zack Stanton uploaded plan to CERS 6/24/26: Strachan Consulting submitted to CEC 7/7: Strachan Consulting submitted to Co. Fire
WORKER SAFETY-1	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	WSP	Complete			6/30/26 Submitted by Zack Stanton to Co Public Health Services Dept. 6/30/26 Submitted by WSP to the CEC. 7/2/26: CPM approval email: PE signed hard copy be maintained at Construction Office

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WORKER SAFETY-1	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	Complete	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 6/22/26: DCBO provided written comments 6/22/26 WSP Submitted Rev. 1 Final Plan to CPM and KCFD
WORKER SAFETY-1	Request comments on the Project Construction and Safety Plan from KCFD and KCSO.(note: KCSO review is related to controlled detonations plan and will occur during construction phase of project).	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	Complete	6/11/2026		6/11/2026: Strachan Consulting submitted copies of correspondence to CPM
WORKER SAFETY-1	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	Complete	6/10/2026		6/10/26: Provided copy of KCFD comments to CPM
WORKER SAFETY-3	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	Complete	6/25/2026		6/25/26 Strachan Consulting emailed information to CPM and copied DCBO.
WORKER SAFETY-4	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	Complete		3/16/2026	Approval documented in 5/7/26 DCBO Weekly Status Report to HDS Project Management Team
WORKER SAFETY-6	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	Complete			6/24/26: WSP emailed plan to CPM 6/29/26 CPM provided comments

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WORKER SAFETY-7	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	Complete	3/24/2026 Rev0 6/9/2026 Rev1	6/29/2026	Rev0 to CPM on 3/24/26. 5/4/26: Comments provided by DCBO Status Report of 5/7/2026 6/9/26 Rev1 to CPM 6/19: Rev1 Final submitted to CBO by Strachan Consulting 6/26 and 7/8/26: CPM email approval 6/29/26: DCBO approval
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	Complete	7/10/2026		7/10/26: Strachan Consulting emailed to the CPM
WORKER SAFETY-11	Provide all the information required for Items 3, 5, and 7.	Provide to 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 start of construction					
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	Complete	7/7/2026		7/7/26: Strachan Consulting emailed agreement to CPM with cc: to DCBO and KCFD