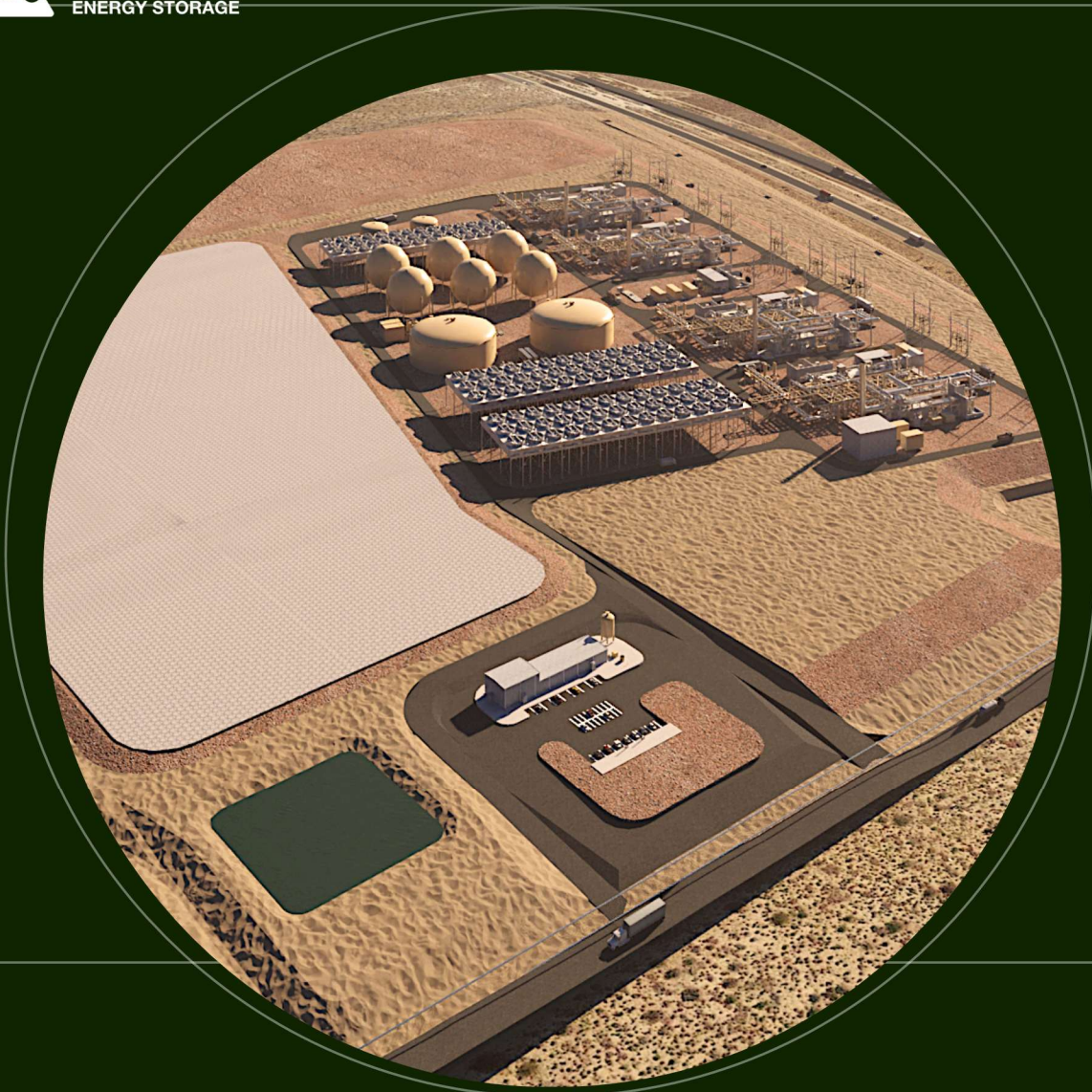


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August 2026

Monthly Compliance Report #6

Willow Rock Energy Storage Center 21-AFC-02C

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

Monthly Compliance Report #6

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” 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 sixth MCR for the WRESC Project. It covers project activities from July 1–31, 2026.

2. Summary of Monthly Compliance Report

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

- A summary of the current Project status, a revised/updated schedule if there are significant delays, and an explanation of any significant changes to the schedule (Sections 3 and 4);
- Documents required by specific CoCs to be submitted along with the MCR. Each of these items shall be identified in the transmittal letter, as well as the Conditions they satisfy, and submitted as attachments to the MCR (Section 5);
- A compliance matrix showing the status of all CoCs related to the pre-construction phase of the Project (Attachment 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 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. In addition, Quanta has been selected as the contractor for the gen-tie line.

Environmental Compliance Update. On July 17, The CEC issued GEM, a Limited Notice to Proceed for pre-construction activities. 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. Biological clearance surveys for special status reptiles, nesting birds, and Desert Tortoise are continuing. As of July 31, approximately 17 WJT have been relocated, and installation of the Desert Tortoise fencing was 90% complete. Trailer placement was 75% complete at the end of July. Trash removal began on July 20 and will continue until accomplished and inspected.

GEM continues to work with CEC staff on the review and approval of compliance submittals required for full Notice to Proceed. Based on the Project schedule and status of the remaining conditions requiring compliance prior to construction, GEM is working toward issuance of a Notice to Proceed on August 14, 2026.

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 "Later Works" and are also identified in Table 1.

Engineering, Procurement, and Construction Update. Engineering supported the Early Works contract award and onboarding during the reporting period. Engineering progress for Early Works is at 73% at the end of July. The following activities were conducted during the reporting period:

- Engineering deliverables issued for construction in July were the clearing and grubbing specification, excavation specification, fencing specification, fill materials specification, Desert Tortoise fence Phase 1 layout drawing, Desert Tortoise fence standard details drawing, geosynthetics specification, placement of fill specification, and site drainage specification.

- Engineering deliverables issued for Client Review during July were the Dawn Road plan and profile and section and detail drawings, site wide culvert civil standard details drawing, site wide erosion and sediment control standard details drawing, site wide security chain link fencing standard details.

Bids were received from contractors and evaluated. A contract was executed with Granite on July 14, 2026, and the contractor mobilized to the project site on July 20, 2026. Procurement progress for the Early Works contract is at 69%.

4. Key Events Schedule

The 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
Obtain LNTP for Pre-Construction Activities	July 17, 2026
Start Trash Removal, WJT Relocation, Desert Tortoise Fencing, Temporary Trailer Placement	July 20, 2026
SITE MOBILIZATION & CONSTRUCTION: EARLY WORKS	
Start Dawn Road Improvements	August 24, 2026
Start Grading (subsurface area, laydown, parking, internal roads)	August 24, 2026

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

5. Compliance Activities: Pre-Construction Phase

This section of the MCR focuses on the activities related to ensuring compliance with all the CoCs that relate to the pre-construction phase of the Project. Project team efforts are focused on developing the pre-construction compliance plans that must be submitted to the CEC CPM for review and approval and, where applicable, to other governmental entities for review and comment, in order to obtain Notice to Proceed by August 14, 2026, so that site mobilization for Early Works activities can begin on August 20, 2026.

Weekly coordination meetings between the CPM, CEC Staff, DCBO, and the GEM team were held to assess progress on submittals and approvals during the reporting period. These meeting are typically held virtually. However, the July 14 meeting was held both in person and virtually. In addition, during the reporting period, meetings were held with the CEC Biology staff and Cultural Resources staff to discuss their comments on the BIO-6 Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP) and the Cultural and Tribal Resources Mitigation and Monitoring Plan (CTRMMP), respectively. Lastly, bi-weekly meetings were held between the DCBO and GEM.

Compliance. The pre-construction compliance matrix was updated during the reporting period 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 August 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		July 15, 2026
BIO-3	Training Notification from Designated Biologist	July 8, 2026		July 13, 2026
BIO-5	WEAP	May 29, 2026;	June 12, 2026;	

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	WEAP Rev. 1	July 2, 2026	July 8, 2026	
	WEAP Rev. 2	July 10, 2026		July 15, 2026
	Revised WEAP Handbook	July 15, 2026		
BIO-6	BRMIMP	May 28, 2026;	June 17, 2026	
	Pre-Construction Aerial Photos	July 1, 2026	July 10, 2026	
	Revised Photos submitted with scale	July 14, 2026		July 15, 2026 (aerial photos)
	BRMIMP Rev, 1	July 16, 2026	July 17, 2026	Conditional Approval July 17, 2026
	BRMIMP Rev. 2	July 28, 2026		
BIO-7	Wildlife Protection and Relocation Plan	June 25, 2026;	June 29, 2026;	July 10, 2026
	Wildlife Protection and Relocation Plan Rev. 1	July 1, 2026	July 6, 2026	
	Wildlife Protection and Relocation Plan #2	July 9, 2026		
BIO-8	Vegetation Management Plan	June 22, 2026	July 1, 2026	
	Veg. Mgmt Plan Rev 1	July 13, 2026	July 15, 2026	
	Veg. Mgmt Plan Rev. 2	July 23, 2026	July 23, 2026	

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	Veg. Mgmt Plan Rev. 3	July 31, 2026	August 7, 2026	
BIO-9	Integrated Weed Management Plan	May 28, 2026	June 12, 2026	
	Integrated Weed Mgmt Plan Rev 1	July 15, 2026	July 16, 2026	July 17, 2026
BIO-10	Invasive Species Management Plan	May 20, 2026	June 19, 2026 & June 24, 2026	
	Invasive Species Mgmt Plan Rev 1	July 15, 2026	July 16, 2026	
	Invasive Species Mgmt Plan Rev 2	July 16, 2026		July 17, 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		
	Special Status Plants Survey Report	July 31, 2026		August 3, 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	
	WJT Relocation Plan Rev 1	June 22, 2026	July 6, 2026	
	WJT Relocation Plan #2	July 10, 2026	July 15, 2026	July 17, 2026
	Resume Desert Biologist	Resume submitted 7/9		Resume Approved 7/15
	Villa Haines Title	July 17, 2026	July 17, 2026	

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	Villa Haines Title Responses to Comments	July 17, 2026	August 6, 2026 CEC/CDFW comments for WJT Mitigation Fee Invoice	July 17, 2026
BIO-13	Crotch's Bumble Bee Mortality Reduction and Relocation Plan;	May 13, 2026	June 19, 2026	July 15, 2026
	Request for Variation to Survey Timing	July 7, 2026	July 8, 2026	
	Crotch's Bumble Bee Mortality Reduction and Relocation Plan Rev 1	July 8, 2026		
BIO-14	Mitigation Security – Letter of Credit	July 20, 2026		July 21, 2026
	WSP Memo re: Mitigation Land	July 16, 2026		July 23, 2026
	Letter of Credit	July 16, 2026		July 21, 2026
	Mitigation Memorandum			July 23, 2026
BIO-16	Raven Management Plan	May 20, 2026	June 2, 2026	
	Revised Raven Management Plan Rev. 1	June 24, 2026	June 26, 2026	
		July 10, 2026	July 10, 2026	

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	Revised Raven Management Plan Rev 2	July 14, 2026	July 16, 2026	July 15, 2026
	Revised Raven Management Plan Rev 3	July 15, 2026		July 21, 2026
	Receipt of payment to Raven Fund			
BIO-16	Desert Tortoise Fencing Specification	June 25, 2026	July 13, 2026	
	Updated DT Fencing Figure	July 28, 2026		
BIO-17	Nesting Bird Survey Plan	May 21, 2026	June 16, 2026	
	Nesting Bird Plan Rev 2	June 30, 2026	July 9, 2026	
	Nesting Bird Plan Rev 3	July 14, 2026		July 15, 2026
BIO-19(a)	Burrowing Owl Mortality Reduction and Replacement Plan	June 30, 2026	July 8, 2026	
	Revised Burrowing Owl Mortality Reduction and Replacement Plan	July 14, 2026	July 16, 2026	
	Revised Burrowing Owl Mortality Reduction and Replacement Plan	July 16, 2026		July 16, 2026
BIO-19(b)	BUOW Observation Notice follow-up	June 9, 2026		June 10, 2026

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
BIO-19	BUOW Survey Report	August 6, 2026		
	KMZ and shapefiles	August 7, 2026		
BIO-20	Swainson Hawk Survey Report	July 31, 2026		August 4, 2026
BIO-23	Mojave Ground Squirrel Survey Report	July 21, 2026		July 31, 2026
BIO-24	Updated State Jurisdictional Waters Report	August 7, 2026		
CIV-1	Drainage spec pkg to DCBO	June 26, 2026	July 10, 2026	
COM-1	Unrestricted Access Commitment	July 17, 2026	July 21, 2026	
COM-4	MCR #5	June 10, 2026		Ongoing
COM-13	Emergency Response Site Contingency Plan	June 2, 2026	June 22, 2026	August 7, 2026
	Emergency Response Site Contingency Plan, Rev 1	August 7, 2026		
CUL/TRI-1	CRS/CRM/Tech. Specialist Qualifications	Additional CRS (Clint Helton) Qualifications submitted May 31, 2026; Letter confirming CRS Available submitted June 30, 2026	April 22, 2026	May 4, 2026 (Approval for all but two CRMs)
	Correspondence with Tribes	July 6, 2026		
	Resume of Cultural Monitor	July 22, 2026		

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	Resumes Technical Specialists	June 30, 2026	July 22, 2026;	
	CRM Resume	July 22, 2026	July 30, 2026	
	Addil Info re: Technical Specialists	July 22, 2026	July 23, 2026	
	Addil Info re: Technical Specialists	July 31, 2026		
CUL-3	CTRMIMP	July 10, 2026	July 24, 2026	
CUL/TRI-4	WEAP	May 29, 2026;	June 22, 2026	
	Revised WEAP	July 2, 2026		July 15, 2026
	Revised WEAP	July 10, 2026		
	Revised WEAP Handbook	July 15, 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
GEN-4	Resident Engineer	July 13, 2026		July 16, 2026 by DCBO
	DCBO approval of Resident Engineer sent to CPM			August, 4, 2026
GEN-5	Design Engineer	June 9, 2026		June 10, 2026 by DCBO
	Civil Engineer	July 9, 2026		July 16, 2026 by DCBO

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	Soils/Geotech, Mechanical, Electrical Engineers	August 3, 2026		August 4, 2026 by DCBO
	DCBO approval of Engineers sent to CPM	August 4, 2026		
GEO-1	Final GeoTech Report	6/24/26 to DCBO	DCBO July 10, 2026	
	Final GeoTech Report – Yeh & Assoc.	July 24, 2026 to DCBO & July 28, 2026 to CEC		July 31, 2026
HAZ-1	Construct HMBP	6/24/26 to DCBO and CPM		July 14, 2026
HAZ-1	SPCC	6/30/26 to DCBO and CPM	July 2, 2026 minor edit	July 2, 2026 conditionally approved
		August 3, 2026 to DCBO and CPM		
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 Rev. 1	June 23, 2026	June 26, 2026	
	Revised Soil Mgmt. Plan Rev. 2	July 30, 2026		July 31, 2026
HAZ-7	Resume of Qualified Environmental Professional	July 6, 2026		July 15, 2026
LAND-1	Laydown/Parking Info for Kern County	June 29, 2026 submitted to Kern County		

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
LAND-2	Construction Site Plan Kern County Comments to CPM	June 16, 2026 to CEC; June 19, 2026 to Kern Co. August 7, 2026	July 30, 2026 August 3, 2026 Co. Comments Rec'd	
NOISE-1	Letter to Residents w/in mile of site	July 10, 2026		July 13, 2026
NOISE-3	Construction Employee Noise Program	June 25, 2026		June 26, 2026
NOISE-6	Construction Noise Restriction Letter	June 28, 2026		
PAL-1	Resume of Paleo Monitor (Dozie Itie)	July 22, 2026		July 23, 2026
PAL-2	Maps & Drawings for PRS	July 10, 2026		July 10, 2026
PAL-3	PRMIMP Revised PRMIMP	June 30, 2026 July 20, 2026	July 8, 2026	 July 21, 2026
PAL-4	WEAP Revised WEAP Revised WEAP Revised WEAP Handbook	May 29, 2026; July 2, 2026 July 10, 2026 July 15, 2026		 June 29, 2026
PAL-4	Sticker for Worker Environmental Awareness Plan	June 3, 2026		June 29, 2026
PAL-5	Resume of WEAP Trainer	July 16, 2026		
PB-1	Construction Sales and Use Taxes	June 25, 2026		
PH-1	Valley Fever Mgmt Plan	June 24, 2026		July 28, 2026

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
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
	Construction Waste Mgmt Plan Rev. 1	July 23, 2026		July 23, 2026
TRANS-1	Construction Traffic Management Plan	June 24, 2026 June 28, 2026 to Kern Co., CALTRANS, CHP		July 8, 2026 conditionally approved
	Const. Traffic Mgmt. Plan, Rev. 1	August 6, 2026		
	Copies of Caltrans, Kern Co Comments (included w/ Plan)	August 6, 2026		
TRANS-2	Kern County Encroachment Permit Application	July 6, 2026	July 28, 2026 Comments from Kern Co. Rec'd	
VIS-2	Project Sign	July 7, 2026		July 9, 2026
WATER-1	DESCP- Stormwater Mgmt Report	July 17, 2026	July 17, 2026	
	Stormwater Mgmt Report, Rev 1	August 7, 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		

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
WATER-7	AVEK Agreement	Provided February 20, 2026; Formally filed June 26, 2026		July 21, 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		
WORKER SAFETY-1	Construction Emergency Action Plan	April 15, 2026	County Fire, CEC & DCBO Comments 5/5/26	
	Const. Emergency Action Plan Rev.1	June 9, 2026	DCBO June 29, 2026	
	Construction Emergency Action Plan Rev. 2	August 3, 2026		
WORKER SAFETY-1	Construction Emergency Response Plan	April 15, 2026	County Fire, CEC & DCBO Comments received 5/5/26	
	Construction Emergency Response Plan Rev. 1	June 9, 2026		DCBO approved June 23, 2026
	Construction Emergency Response Plan Rev.2	August 3, 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

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	Construction Fire Protection Plan Rev. 1	June 22, 2026	DCBO Conditional Approval Comments Rec'd 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	CEC July 31, 2026 ; July 31, 2026 Conditional DCBO Approval
	Sampling and Analysis Plan Rev 1	July 21, 2026		
	Sampling and Analysis Plan Rev 2	August 6, 2026		
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		July 13, 2026
WORKER SAFETY-11	Email to CEC and DCBO items covered in Worker Safety-1	July 21, 2026		
	Email to Kern Co. Fire	August 3, 2026		
	KCFD Email – No Further Comments	August 5, 2026 August 7, 2026		

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	Submittal of KCFD Email to CPM			
WORKER SAFETY-12	Funding Mitigation for Kern County Fire Department Agreement	July 7, 2026		July 8, 2026
	Formal Agreement with Kern Co. Fire	August 3, 2026		

Required Compliance Documents Submitted with this Report. The Final Decision sets forth specific conditions, many of which include reporting requirements that must be addressed in the MCR. With the implementation of the LNTP for Pre-Construction Activities, compliance activities were initiated for the conditions listed below. Also included are the required compliance documents for these conditions.

- **AQ-SC-3, AQ-SC-4, and AQ-SC5:** The Air Quality Construction Mitigation Manager (AQCOMM) for the project is responsible for directing and documenting compliance with the air quality conditions of certification related to pre-construction. The AQCOMM's monthly report is provided in Appendix C of this MCR.
- **BIO-2:** The Designated Biologist's report is included in Attachment D.
- **BIO-5, CUL-4, PAL-4:** The Worker Environmental Awareness Program (WEAP) training certification forms are included in Attachment E. A total of 95 persons were trained during the reporting period. The WEAP Trainers were Jeremy Paris and Kate Moss (Biological Resources), David Schroeder (Paleontological Resources), and Ryan Arp (Cultural Resources).
- **CUL/TRI-4:** The Cultural Resources Specialists Monthly Report is being filed separately as a confidential filing.
- **GEN-3:** A statement from the DCBO acknowledging receipt of payment is provided by the DCBO directly to the CEC in its Weekly Status Report sent directly to the CPM.
- **PAL-6:** A summary of monitoring and paleontological activities and the daily monitoring logs of paleontological resource activities are included in Attachment F.
- **WORKER SAFETY-3:** The Construction Safety Supervisor's report is included in Attachment G.

6. Status of Delayed Submittals

The CEC compliance submittals for Conditions LAND-1 and TRANS-2 are delayed due to pending comments/approval from the Kern County Planning and Natural Resources Department and issuance of the Dawn Road encroachment permit from the Public Works Department, respectively. In addition, the submittal of Condition BIO-24 was delayed.

7. Approved Changes to Conditions of Certification or Verification Language and Condition Clarifications

Below are summaries of the Verification language changes approved to date and clarifications on specific condition. The full text of the Verification language changes for the conditions listed is included in Attachment A.

Verification Language Changes to Worker Safety-1 and 11. To support the Early Works activities, GEM 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 nox 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 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.

Verification Language Changes to Civil-1, GEN-2, GEN-4, and GEN-5: In June 2026, the DCBO agreed to the following Verification language 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.

Verification Language Changes to BIO-24, CUL/TRI-2, LAND-2, PAL-2, TRANS-1, WATER-1: On July 21, 2026, the CPM approved Verification language timing modifications to the following conditions:

- BIO-24: The Verification timing was modified so the compliance submittal was due 45 days prior to construction rather than site mobilization. In addition, additional language was added to recognize that a separate submittal will be made for the gen-tie line.
- CUL/TRI-2: The Verification timing was modified to enable the information to the CRS to be provided prior to Early Works grading rather ground disturbance.
- LAND-2: The Verification timing was modified to specify that separate construction site plans would be submitted for Early Works, Late Works, and the gen-tie line.
- PAL-2: The Verification timing was modified to enable the information to the PRS to be provided prior to Early Works grading rather ground disturbance.
- TRANS-1: The Verification timing was modified to reflect that two Traffic Management Plans will be submitted, one for the site and one for the gen-tie line.
- WATER-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.

The full text of the CoCs with the approved Verification language changes are included in Attachment A of this MCR.

Verification Language Change to SOCIO-2. On August 5, the CPM approved a Verification language change to Condition SOCIO-2 modifying when proof of payment of the school facility development fee must be submitted from “at least 30 days prior to construction” to “at least 30 days prior to at least 30 days prior to the start of construction of inhabitable offices and buildings.”

Clarifications on Controlled Detonations. Following a March 5, 2026, meeting with CEC Staff, on March 16, 2026, GEM 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.

Clarification on Worker Safety-11, Construction Water Supply. Condition Worker Safety-11 requires that a fire water flow of at least 1,500 gallons per minute be provided. On April 28, 2026, the DCBO clarified that for construction, 60,000 gallons of fire water storage is required.

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
Kern County Department of Planning and Natural Resources	The Kern County Department of Planning and Natural Resources requested that GEM 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 Planning and Natural Resources	July 27, 2026 & August 5, 2026

Government Agency	File/Permit/Engagement	Date
	Department, Fire Department, Public Health Services Department – Hazardous Materials. In addition, 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.	July 9, 2026
Kern County Public Works Department	The Trans-2 Encroachment Permit Application was submitted for approval. Comments on the Encroachment Permit Application were received. A follow-up email asking for comments on the Trans-1 Traffic Management Plan was submitted to the County	July 6, 2026 July 28, 2026 July 23, 2026
CalTrans	CalTrans comments on the Traffic Management Plan were received	July 22, 2026
California Highway Patrol	A follow-up email asking for comments on the Trans-1 Traffic Management Plan was submitted to the CHP	July 23, 2026
Kern County Public Health Services Department – Hazardous Materials	An email was received from the Kern County Public Health Services Department – Hazardous Materials providing project information stating that they do not require Soil Management Plans.	July 13, 2026
Kern County Fire Department	The KFCFD provided email correspondence stating that is had not further comments on the ERP, EAP, FPP, and no comments on the Hazardous Materials Business Plan The KCFD provided their formal agreement for USAR funding and the funding schedule	July 8, 2026 July 29, 2026
Division of Safety of Dams	A meeting was held with the DSOD, CEC, DCBO, and GEM to discuss status of reservoir design and clarification of jurisdictional boundaries.	July 13, 2026

9. Compliance Activities to Be Conducted in August/September 2026

As stated previously, the project is in the pre-construction phase and working diligently in preparation for Early Works construction activities. It is anticipated that the following compliance documents will be submitted over the next two months.

- BIO-8: Final Vegetation Management Plan
- BIO-12: Payment of WJTCA Mitigation Fees
- BIO-13: Crotch's Bumble Bee Survey Report
- BIO-15: Special Status Reptile Species Survey Report
- BIO-16: Desert Tortoise Survey Report
- BIO-17: Nesting Bird Survey Report
- BIO-22: Survey Report
- BIO-24: Streambed Impact Minimization and Compensation Measures to construction contractors
- CUL/TRI-3: Final CRMIMP
- GEN-2: Master Drawing and Specification List for Later Works activities
- TRANS-1: Final Traffic Management Plan
- TRANS-2: Offer to Dedicate, Encroachment Permit
- Worker Safety-1: Revised Construction Fire Prevention Plan

10. New Additions to the On-Site Compliance File

Once the trailers have been temporarily placed, the on-site electronic compliance files will be stored on-site.

11. Incidents and Corrective Actions

There were no incidents or corrective actions during the reporting period.

ATTACHMENT A

Approved Condition Verification Language Changes

Worker Safety CEC Staff Approved Verification Changes, March 2026

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, Tthe 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, June 2026

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 engineer may be delegated responsibility for mechanical and electrical portions of the 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 review 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.

Environmental Conditions CEC Approved Verification Changes, July 2026

BIO-24 (Full condition not included due to length and no submittal timing is specified in the Condition)

Verification: The project owner shall provide the updated Jurisdictional Report that clearly delineates all proposed permanent and temporary impacts, the proposed engineering drawings for each crossing type, and the hydrologic studies used to inform the engineering design to the CPM for review and approval no less than 45 days prior to construction site mobilization. The project owner shall provide Final Reports and Plans to the CPM and the CDFW no later than 14 days prior to the installation of any engineered crossing, bridge, or new culvert.

A separate update Jurisdictional Report shall be provided 45-days prior to construction of the gen-tie line.

CUL-2/TRI-2

INFORMATION TO BE PROVIDED TO THE CRS

Prior to the start of ground disturbance, the project owner shall provide the CRS with copies of the application for certification (AFC), data responses, confidential cultural resources reports, all supplements, the cultural and tribal cultural resources section from the CEC's Final Staff Assessment (FSA), and the **Cultural and Tribal Cultural Resources** Conditions of Certification from the CEC's Final Decision for the project, if the CRS does not already possess copies of these materials. The project owner shall also provide the CRS and the CPM with maps and drawings showing the footprints of the power plant, all linear facility routes, all access roads, and all laydown areas. Maps shall include the appropriate United States Geological Survey quadrangles and a map at an appropriate scale (e.g., 1:24,000 and 1 inch = 200 feet, respectively) for plotting cultural features or materials. If the CRS requests enlargements or strip maps for linear facility routes, the project owner shall provide copies to the CRS and CPM. The CPM shall review map submittals and, in consultation with the CRS, approve those that are appropriate for use in cultural resources planning activities. No ground disturbance shall occur prior to CPM approval of maps and drawings unless such activities are specifically approved by the CPM. Maps shall include any cultural and tribal cultural resources, including any historic built environment resources, identified in the FSA's project area of analysis (PAA). If construction of the project would proceed in phases, maps and drawings not previously provided shall be provided to the CRS and CPM prior to the start of each phase. Written notice identifying the proposed schedule of each project phase shall be provided to the CRS and CPM.

Weekly, until ground disturbance is completed, the project construction manager shall provide to the CRS and CPM a schedule of project activities for the following week, including the identification of area(s) where ground disturbance will occur during that week.

The project owner shall notify the CRS and CPM of any changes to the scheduling of the construction phases.

The project owner shall provide the documents described in the first paragraph of this condition to the new CRS if the approved CRS is terminated or resigns.

Verification: At least 15 days prior to the start of Early Works grading. (or a project owner and CPM mutually agreed upon alternative time frame) ground disturbance, the project owner shall provide the CPM notice that the AFC, data responses, confidential cultural resources documents, all supplements, FSA, and Final CEC Decision have been provided to the CRS, if needed, and the subject maps and drawings to the CRS and CPM. The CPM will review submittals in consultation with the CRS and approve maps and drawings suitable for cultural resources planning activities.

At least 515 days prior to the start of Early Works grading. (or a project owner and CPM mutually agreed upon alternative time frame) ground disturbance, if there are changes to any project-related footprint, the project owner shall provide revised maps and drawings for the changes to the CRS and CPM.

At least 15 days prior to the start of each phase of a phased project (or a project owner and CPM mutually agreed upon alternative time frame), the project owner shall submit the appropriate maps and drawings, if not previously provided, to the CRS and CPM.

Weekly, during ground disturbance, a schedule of the next week's anticipated project activity shall be provided to the CRS and CPM by letter, e-mail, or fax.

LAND-2

Prior to any grading or development for the permanent project facilities under CEC jurisdiction (including the Willow Rock Energy Storage Center, gen-tie line, and optional architectural berm) the project owner shall develop a construction site plans (including the temporary rock crushing facility and concrete batch plant) and operation site plans (including the optional architectural berm) and submit it to the Kern County Planning and Natural Resources Department for review and comment, and to the CPM for approval, to ensure compliance with local regulations, including conditions required by the ALUCP. The project owner shall adhere to CPM-approved site plans during construction and operation and ensure that local regulations are complied with during construction and operation of the permanent project facilities.

Verification: At least 60 days prior to any grading or development for permanent project facilities under CEC jurisdiction (or a project owner and CPM mutually agreed upon alternative time frame) (including the Willow Rock site, gen-tie line, and a potential architectural berm), for each project phase (Early Works, Later Works, and the gen-tie line), the project owner shall submit proposed site plans for these facilities to the Kern County Planning and Natural Resources Department for review, comment, and approval, and to the CPM for review and approval. The project owner shall provide any review comments from Kern County to the CPM at least 30 days prior to any grading or development for these permanent project facilities: (or a project owner and CPM mutually agreed upon alternative time frame).

Separate construction site plans shall be submitted for Early Works, Later Works, and the gen-tie line prior to grading or development for the permanent project facilities for each phase.

PAL-2

The project owner shall provide the PRS and the CPM, for review and approval, 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. If the PRS requests enlargements or strip maps for linear facility routes, the project owner shall provide copies to the PRS and CPM. The site grading plan and the plan and profile drawings for the utility lines would be acceptable for this purpose. The plan drawings must show the location, depth, and extent of all ground disturbances and be at a scale between 1 inch = 40 feet (1:480) and 1 inch = 100 feet (1:1,200). If the footprint of the project or its linear facilities change, the project owner shall provide maps and drawings reflecting those changes to the PRS and CPM.

If construction of the project proceeds in phases, maps and drawings may be submitted prior to the start of each phase. A letter identifying the proposed schedule of each project phase shall be provided to the PRS and CPM. Before work commences on affected phases, the Project owner shall notify the PRS and CPM of any construction phase scheduling changes.

At a minimum, the project owner shall ensure that the PRS or PRM consults weekly with the project superintendent and construction field manager to confirm area(s) to be worked the following week, until ground disturbance is completed.

Verification: At least 15-30 days prior to the start of Early Works grading. (or a project owner and CPM mutually agreed upon alternative time frame) ~~ground disturbance~~, the project owner shall provide maps and drawings to the PRS and CPM for review and approval.

If there are planned changes to the footprint of the project, revised maps and drawings shall be provided to the PRS and CPM at least 5-15 days prior to the start of grading. (or a project owner and CPM mutually agreed upon alternative time frame) ~~ground disturbance~~.

TRANS-1

Prior to the start of construction, the project owner shall prepare Construction Traffic Management Plan (CTMP). The CTMP shall address the movement of workers, vehicles, equipment, and materials, including arrival and departure schedules, carpooling, a parking/staging plan, and designated workforce and delivery routes. Traffic control plans shall be prepared as necessary to address construction staging, as well as any roadway or lane closures and shall include any signage or roadway lighting improvements deemed necessary during construction. The CTMP shall address means of access for emergency vehicles to the project site, as well as means of maintaining access to any adjacent residential and commercial property during the construction and maintenance of the project.

The CTMP shall include procedures to restore damage to existing roadways caused by project construction traffic, including corresponding traffic index calculations. The construction contractor shall work with Kern County and Caltrans to prepare a schedule and mitigation plan for the roadways along construction routes, in accordance with the procedures established by the CTMP.

The CTMP shall include measures to ensure safe ingress and egress at the project access intersections. Measures may include removal of vegetation to provide unobstructed line of sight, addition of advanced warning signs, and active work zone traffic control/traffic

management as approved by the CPM. The CTMP shall also be submitted to Kern County and Caltrans for review and comment.

Verification: At least 60 calendar days prior to the start of construction, for the project site and 60 calendar days prior to the start of construction for the gen-tie line, the project owner shall submit the each CTMP to Kern County, Caltrans, and California Highway Patrol (CHP) for review and comment and to the CPM for review and approval. The project owner shall also provide the CPM with a copy of the transmittal letters to Kern County, Caltrans, and CHP requesting review and comment.

The CTMPs shall include transportation demand management (TDM) measures to reduce project-generated VMT during construction. The CTMP shall outline VMT reduction measures, which may include, by way of example, the following:

- Provide information regarding lodging for specialized workers about lodging options close to the site.
- Create or promote existing carpooling programs to encourage employees to carpool.
- Offer a shuttle service for employees with pick-up points at nearby hotels housing specialized workers or park-and-ride lots.

At least 30 calendar days prior to the start of construction for the project site and 30 calendar days prior to the start of construction for the gen-tie line, the project owner shall provide copies of any comment letters received from Kern County, Caltrans, CHP, or any other interested agencies, along with any changes to the CTMP, for CPM review and approval. After CPM review and approval, the project owner shall provide completed copies of the final CTMPs to Kern County, Caltrans, CHP, and any other interested agencies, sending copies of the correspondence to the CPM.

WATER-1

(Condition not included due to length and no submittal timing is specified in the Condition)

Verification: No later than forty-five (45) thirty (30) days prior to start of the October 1, 2026 rainy season, (or a project owner and CPM mutually agreed upon alternative time frame) site mobilization, the Project owner shall submit a copy of the final DESCP to the CPM for review and to Kern County and the Lahontan RWQCB if required. The CPM shall consider comments if received by the county and RWQCB before approval of the DESCP. The DESCP shall be consistent with the grading and drainage plan as required by Condition of Certification **CIVIL-1**, and relevant portions of the DESCP shall clearly show approval by the chief building official. The Project owner shall provide in the Monthly Compliance Report with a narrative on the effectiveness of the drainage, erosion, and sediment-control measures and the results of monitoring and maintenance activities. Once operational, the Project owner shall update and maintain the DESCP for the life of the Project and shall provide in the annual compliance report information on the results of monitoring and maintenance activities.

A separate DESCPC shall be submitted for the Later Works area no later than thirty (30) days prior to the start of Later Works grading (and no later than thirty (30) days prior to the start of construction of the gen-tie line (or a project owner and CPM mutually agreed upon alternative time frame).

SOCIO-2

The project owner shall 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.

Verification: At least 30 days prior to the start of construction of inhabitable offices and buildings, the project owner shall provide to the CPM proof of payment to the Mojave Unified School District of the statutory development fees.

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	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 (AQCOMM) and delegate AQCOMMs.	Submit to the CPM for approval the name, resume, qualifications, and contact info for the AQCOMM and all AQCOMM delegates	At least 30 days prior to ground disturbance	WSP	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	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	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	2/27/2026 4/22/2026	4/28/2026 for Moss, Paris, Kraft, Wilcox, Moorhatch, Chumley	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
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	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.

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

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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	7/8/2026	7/13/2026	7/8/26: Strachan Consulting emailed WSP letter to CPM 7/13/26: B. Fooks email approval
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	5/29/2026	7/15/2026	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 7/8/26: Received comments from CPM 7/10/26: WSP emailed WEAP (redline, light, Spanish version, wallet card, Tribal documentation) to CPM 7/14/26: Received comments from CPM 7/15/25: WSP emailed revised version to CPM 7/15/26: CPM email approval
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	5/28/2026		7/16/26: WSP emailed final to CPM. 7/17/26: CPM provided Conditional Approval until July 28 -- requests revised version based on provided sample BRMIMP and also address operations and decommissioning
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	7/16/2026		7/16/26: WSP emailed final to CPM. 7/17/26: CPM provided Conditional Approval until July 28 7/28/26: WSP emailed Rev2 to CPM
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	Hydrostor	7/1/2026	7/5/2026	7/1/26: WSP provided link to CPM to download photo file 7/10/26: CPM provided comment 7/14/26: WSP transmitted photos with scale to CPM 7/5/26: CPM email approval

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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	6/25/2026	7/10/2026	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 sent 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 mobilization	WSP	6/22/2026		6/22/26: WSP emailed plan to CPM 7/1/26 CPM emailed comments 7/14/26: WSP transmittal of Desert Botanist resume to CPM 7/15/26 CPM approved Desert Botanist
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		7/13/26: WSP submitted Rev1 to CPM 7/15/26: CPM emailed comments 7/20/26: WSP submitted Rev2 to CPM 7/23/26: CPM emailed comments 7/31/26: WSP submitted Rev3 to CPM in both redline and final formats 8/7/26: CPM returned CEC/CDFW comments on Rev3
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	5/28/2026	7/17/2026	5/28/26 WSP emailed plan to CPM 6/12/26: CPM requested additional information 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	7/15/2026	7/17/2026	7/15/26: WSP submitted plan to CPM 7/16/26: CPM emailed CEC/CDFW comments 7/16/26: WSP emailed Rev 2 to CPM 7/17/26: CPM email approval
BIO-10(a)	Develop and a Draft Invasive Species Management Plan	Provide a draft Invasive Species Management Plan to the CPM for review and approval	At least 45 days prior to the start of site mobilization	WSP	5/20/2026	7/17/2026	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

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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	7/15/2026	7/17/2026	7/15/26: WSP submitted final plan to CPM 7/16/26: CPM emailed additional comments 7/16/26: WSP emailed Rev 2 to CPM 7/16/26: CPM emailed comment 7/16/26: WSP emailed Rev 3 to CPM 7/17/26: CPM email approval
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	5/6/2026	6/25/2026	5/6/26: Submitted by WSP:--no special status plants found 5/22/26: CPM provided comments 6/19/26: Email from A. Gutierrez requesting additional information 6/23/26: WSP emailed revised plan to CPM 6/26/26: CPM email approval.
BIO-11(a)	Prepare and submit the Special Status Plants survey report.	Submit the plan to the CPM for review and approval.	Annually	WSP			7/31/26: WSP emailed report to CPM 8/3/26: CEC 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 any project activities that will impact WJTs, including site mobilization/ construction	WSP	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	6/22/2026		6/22/26: WSP emailed Final Plan to CPM 7/6/26: CPM returned additional comments and requested a red-line version 7/9/26: WSP provided resume of Senior Desert Botanist 7/10/26: WSP emailed final plan to CPM 7/14/26: WSP re-transmittal of Plan 7/15/26: CPM provided comments 7/15/26: Title of Villa Haines and memo re: the initiation of BIO-14 mitigation efforts provided to CPM. 7/15/26: B. Fooks requested additional info re: Villa Haines title. 7/16/26: N. Eckert provided responses to B. Fooks questions and a new title. 7/17/26: WSP submitted revised final plan to CPM. 7/17/26 CPM email approval

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BIO-12(c)	Pay the WJTCA mitigation fees.	Submit the fee payment to CDFW Region 4.	Prior to any project activities that will impact WJT	Hydrostor			8/6/26: CPM email requesting more specific info needed to calculate relocation fees; sample table provided
BIO-13(a)	Prepare a draft Crotch's Bumble Bee Mortality Reduction and Relocation Plan	Submit the draft plan to the CPM for review and approval and to the CDFW/for review and comment.	No less than 45 days prior to commencing surveys	WSP	5/13/2026	7/15/2026	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	7/8/2026	7/15/2026	7/9/26: WSP submitted final plan to CPM 7/15/26: CPM email approval
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	WSP			
BIO-13(d)	Provide results of each CBB 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			Preclearance only - no preconstruction required
BIO-14	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. If the project owner elects to provide for the acquisition, permanent protection, and perpetual management of habitat management lands, the project owner may proceed with activities only after the project owner has ensured the funding (Security) to complete any activity required for Habitat Management Land Acquisition and Protection that has not been completed before the activities begin.	Provide details maps to the CPM for approval, in consultation with CDFW. The project owner may proceed with project activities only after the project owner has ensured the funding.	Prior to EW site mobilization	Hydrostor/ WSP	7/17/2021	7/21/2026	7/16/26: WSP emailed Technical Memo to CPM re: confirmation of commitment to dedicate the Villa Haines property as Permittee Responsible Mitigation Land 7/15/26: HDS provided Title of Villa Haines to CPM. 7/15/26: B. Fooks requested additional info re: Villa Haines title. 7/16/26: N. Eckert provided responses to B. Fooks questions and a new title.
BIO-14(b)	If the project owner elects to provide for the acquisition, permanent protection, and perpetual management of habitat management lands, the project owner may proceed with activities only after the project owner has ensured the funding (Security) to complete any activity required for Habitat Management Land Acquisition and Protection that has not been completed before the activities begin.	The project owner may proceed with project activities only after the project owner has ensured the funding.	Security - Prior to the start of Early Works project activities	Hydrostor			7/17/26: \$6.4M letter of credit delivered to B. Fooks 7/21/26: CPM email confirming receipt of LOC

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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		4/16/26	Rev 0 submitted 3/11/2026 Rev 1 submitted 4/6/26
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	4/6/2026	4/16/2026	4/16/26: CPM email approval
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			
BIO-15(d)	Prepare Special Status Reptile Species pre-construction survey report, including location of the microhabitats for these species and locations to place cover boards or rake soils.	Submit to the CPM and CDFW	Within 7 days of completing the surveys	WSP			
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	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	WSP			
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			
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			
BIO-16(e)	If DT or active burrows are detected during pre-clearance surveys, stop work within 200 feet of any potential burrow or DT.	DB to contact the CPM, CDFW, and USFWS immediately for guidance.	As required	WSP			
BIO-16(i)	Prepare a report documenting the DT survey results and other specific information required in the CoC	Submit report to CPM, CDFW, and USFWS	Within 14 days after completing surveys	WSP			

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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	6/17/2026 6/25/26 8/4/26 DCBO states drawing is still missing requested information		6/3/26: Email from CEC Staff Alex Single confirmed the project does not need DT fencing around the entire site just areas to be impacted by significant activity including earthmoving, WJT removal, parking, and lay-down/staging areas. 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 DT fencing around the relocation sites. 6/25/26: Fencing specs sent to CPM 6/27/26: DT fencing specs to DCBO 7/13/26: CPM emailed comments 7/16/26: Strachan Consulting emailed WRESC response to CEC comments 7/17/26: Strachan Consulting emailed CPM confirmation that permanent fencing on north side of Dawn Rd will be installed at a depth to prevent DT from entering the site. 7/28/2026: DT fencing details to CPM 8/4/2026: DT fencing to DCBO 8/5/2026: DCBO requested that DT fencing be included on Construction Site Plan.
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	5/20/2026: Draft Plan 6/24/26: Final Plan	7/15/2026	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 7/10/25: CPM provided additional comments 7/14/26: WSP forward final plan to CPM 7/15/26: CPM email approval

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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	7/15/2026	7/21/2026	6/23/26: CPM submitted REAT Deposit document to CDFW 6/26/26: CDFW requested revisions and resubmittal by CEC 7/14/26: NFWF confirmed receipt of payment of \$11,718 7/15/26: Strachan Consulting submitted receipt to CPM 7/21/26: CPM confirmed receipt of payment confirmation.
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	5/21/2026	7/15/2026	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 7/14/26: WSP submitted final plan to CPM 7/15/26: CPM email approval
BIO-17(b)	Conduct at least TWO pre-construction nesting bird 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	Report due 8/17/2026			
BIO-17(c)	Prepare the pre-construction survey reports.	Submit the pre-construction nesting bird survey reports to the CPM and CDFW	No more than 30 days after each survey effort has been completed.	Report due 8/17/2026			
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	Report due 8/17/2026			

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BIO-19(a)	Prepare a Burrowing Owl Mortality Reduction and Replacement Plan	Submit the plan for review and approval to the CPM, and to CDFW for review and comment	At least 30 days prior to initiation of site mobilization	WSP	6/30/2026	7/16/2026	6/30/26: WSP emailed plan to CPM 7/8/26: CPM emailed comments 7/14/26: WSP emailed final plan to CPM 7/16/26: CPM emailed additional comments 7/16/26: WSP emailed revised final plan 7/16/26: CPM email approval
BIO-19(b)	Conduct pre-construction nesting surveys for burrowing owls.	The DB shall provide the pre-construction survey results to the CPM.	Within 14 days of the completion of the survey	WSP			8/6/26: WSP transmitted survey report to CPM
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	5/1/2026	6/10/2026	5/1/26: BUOW observation notice provided to CPM. 6/9/26: Observation Notice Follow-up 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			8/7/26: WSP transmitted Shape files to CPM
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	7/31/2026	8/4/2026	7/31/26: WSP submitted survey report to CPM 8/3/26: CEC email approval with request to show start/end times on daily surveys and show on a map if multiple species of birds use stick nests using a symbol system.
BIO-21(a)	DB shall conduct a small mammal clearance survey of the project site and laydown areas to identify new or modified dense 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	8/6/2026		8/6/26 WSP emailed survey report to CPM
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			
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 review and comment.	No less than 45 days prior to conducting the surveys	WSP	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 Mohave Ground Squirrel pre-construction survey report	Submit protocol surveys and submit written reports to CPM and CDFW	No more than 21 days after the survey effort is completed	WSP	7/20/2026		7/20/26: WSP submitted survey report to CPM 7/31/26: CEC email approval
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			
BIO-24(b)	Prepare a Stream Diversion Plan	Provide to CPM for review and approval and CDFW for review and approval	Timeframe not provided in	WSP			
BIO-24(c)	Updated Jurisdictional Waters Report, the proposed engineering drawings for each crossing, and the hydrologic studies used to inform the designs.	Provide to the CPM for review and approval	No less than 45 days prior to site mobilization.	WSP			8/7/26: WSP emailed Updated JD Report to CPM
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			
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	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 8/5/26: Hatch provided Stormwater Management Design Report to DCBO 8/7/26: WSP emailed Stormwater Management Design Report to CPM
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			7/16/26 Strachan Consulting emailed preliminary stormwater management report and drainage layout drawing to CPM in compliance with Water-1.
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	8/7/2026		8/7/26: WSP emailed Stormwater Management Design Report to CPM

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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			7/21/26: Strachan Consulting sent email to NV5 requesting confirmation that GEO-1 report by Yeh & Associates satisfies this condition.
COM-1	Confirmation of unrestricted access to CPM, CEC staff and delegate agencies for consultants.	Provide confirmation to CPM.	Complete	Hydrostor	7/16/2026	7/21/2026	7/17/26: Noah Eckert email to CPM and DCBO confirming commitment to abide by requirements of COM-1 7/21/26: B. Fooks and CPM provided email acceptance.
COM-3	Compliance Verification Submittals	Follow submittal protocol set forth in Condition	Ongoing	Strachan	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		
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		Updated matrix is included in each MCR.
COM-6	Prepare a Monthly Compliance Report	Submit to the CPM	Monthly	Strachan	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	6/26/2026		6/26/26: Strachan Consulting emailed verification to CPM
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	6/2/2026	8/7/2026	6/2/26: WSP emailed plan to CPM 6/22/26: CPM comments rec'd 8/5/26: WSP emailed revised plan to CPM. 8/7/26: CPM email approval
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	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 5/4/26: 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	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
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	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 5/4/26: CPM email approval of CRMs
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		7/22/2026		7/22/26: WSP emailed CEC Staff additional info supporting Technical Specialists qualifications 7/22/23: WSP submitted resume of Michelle Courtney as alternate CRM for CPM review and approval 7/29/26: CPM requested additional information on Michelle Courtney's quals 7/31/26: WSP provided reference info for Kate Umlauf 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	7/6/2026	7/13/2026	This item is satisfied by the CUL/TRI-5 submittal made to the CPM on July 6, 2026 7/13/26: B. Fooks email indicates Condition is approved
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	6/30/2026	7/13/2026	6/30/26: Strachan Consulting submitted resumes to CPM 7/13/26: B. Fooks email indicates Condition is approved
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	Hydrostor	6/29/2026	7/13/2026	6/29/26: Strachan Consulting submitted resumes to CPM 7/13/26: B. Fooks email indicates Condition is approved
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	7/9/2026	7/13/2026	7/9/26: Strachan Consulting submitted Owner's letter to CPM 7/13/26: B. Fooks email indicates Condition is approved

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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	7/10/2026	Naghmeh: Ryan has updated CEC on his progress	7/10/26: WSP emailed to CPM 7/21/26: WSP/CEC Staff held working session 7/22/26: Strachan Consulting distributed comments from working session 7/23/26: CPM provided Staff's Tech Memo addressing changes that need to be made. 7/31/26: WSP working on setting up live tracker
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	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	5/29/2026	7/15/2026	5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed to CPM 6/22/26: CPM provided comments 7/2/26: WSP emailed update to CPM 7/8/26: Received comments from CPM 7/10/26: WSP emailed WEAP (redline, light, Spanish version, wallet card, Tribal documentation) to CPM 7/14/26: Received comments from CPM 7/15/25: WSP revised version to CPM 7/15/26 CPM email approval
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	6/3/2026	6/3/2026	6/3/26: WEAP Training form received from CPM
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	7/6/2026	7/13/2026	7/6/26: WSP emailed Tribal notifications to the CPM 7/13/26: B. Fooks email indicates Condition is approved

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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	2/27/2026	3/18/2026	3/18/26: CPM email confirmed receipt of Project Owner's letter 7/13/26: B. Fooks email approval
CUL/TRI-8	Conduct cultural surveys of any areas that were unable to be surveyed or sites that were not formally evaluated.	Notify the CPM of any additional surveys	Within 30 days	WSP		7/16/2026	Additional survey info provided under Confidential cover by Jeff Harris 7/16/26: CEC email approval
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	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			
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, 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		5/7/2026	Approval received via DCBO Weekly Status Report to HDS Project Management Team
GEN-4(a)	Assign a California-registered architect, or a structural or civil engineer, as the resident engineer in charge of the project.	Submit to the DCBO for review and approval, the resume and registration number of the resident engineer and any other delegated engineers assigned to the project.	At least 30 days prior to the start of LW rough grading	Hatch	7/13/2026	7/16/2026	7/13/26: Strachan Consulting submitted Evan Hsaio's resume for this role 7/16/26: DCBO approved Evan Hsaio as Resident Engineer

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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	6/9/2026	7/16/2026	7/13/26: S. Strachan submitted resume of Evan Hsaio for civil engineer, 7/16/26: DCBO approved Mr. Hsaio as Civil Engr.
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	6/9/2026	7/16/2026	6/9/26: Strachan Consulting submitted resume of Evan Hsaio to CPM and DCBO for Design Engineer. 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 the responsible engineers.	Within 5 days of DCBO approval	Hatch/CMT			8/4/26 DCBO approved electrical, mechanical, and geotech.
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	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 7/24/26: Revised plan sent to DCBO 7/28/26: WSP submitted revised plan to CPM 7/31/26: DCBO approval received
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	6/22/2026	7/14/2026	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 7/14/26: CPM email approval
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	PE and PM Signatures added to SPCC	7/2/2026 Conditional Approval	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 with requirement that physical hard copy of SPCC be maintained at site construction office and includes the PE signature on page vii of the document.

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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	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	5/26/2026	7/31/2026	5/26/26 Strachan Consulting emailed to Kern Co. Public Health Services. 6/18/26: Follow-up email sent to Kern County 7/15/16: Strachan Consulting provided email to CPM re SMP not required by KC
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	5/27/2026	7/31/2026	5/26/26 Strachan Consulting emailed to Kern Co. Public Health Services. 6/18/26: Follow-up email sent to Kern County 7/15/16: Strachan Consulting provided email to CPM re SMP not required by KC 7/26/26: CPM provided comments 7/30/26: WSP emailed revised plan to CPM 7/31/26: CPM email approval
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	7/6/2026	7/15/2026	7/6/26: WSP submitted to CPM 7/14/26: WSP retransmitted to CPM 7/15/26: CPM email approval
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			6/29/26: Common Sense provided to Kern Co Planning and Natural Resources Dept. 8/5/26: Commens Sense provided response to comments to Kern Co. Planning.

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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 Early Works permanent project facilities	Hatch/Hydrostor	6/16/2026		6/16/26: Emailed to CPM by Strachan Consulting 6/19/26: Submittal provided to Esther Villa with Kern Co Planning & Natural Resources Dept. 7/30/26: CPM provided comments and request for additional information 8/3/26: Comments received from KC
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 any grading or development for permanent project facilities	Hatch	8/7/2026		8/7/26: Strachan Consulting provided KC comments to CPM
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	7/10/2026	7/13/2026	7/10/26: Strachan Consulting emailed to the CPM 7/13/26: CPM email approval
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	6/25/2026	6/26/2026	6/25/26: WSP submitted plan to CPM 6/26/26 CPM email approval
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	8/10/2026	6/28/26: Strachan Consulting emailed letter to CPM 8/10/26: CEC email approval
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	2/27/2026	3/19/2026	3/19/26: CPM email approval

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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	2/27/2026	3/19/2026	3/19/26: CPM email approval
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	7/10/2026	7/16/2026	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 7/10/26: PRS email approval 7/16/25: CPM email 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	6/30/2026	7/21/2026	6/30/26: WSP submitted to CPM 7/8/26: CPM emailed comments 7/20/26: WSP submitted Rev.1 to CPM 7/21/26: CPM email approval
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	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
PAL-5	The resume and qualifications of the trainer shall be submitted to the CPM for review and approval prior to providing WEAP training.	Submit the resume to the CPM for review and approval.		WSP	2/6/2026	7/16/2026	7/16/26: Strachan Consulting submitted confirmation that approved PRS will conduct training 7/16/26: CEC email 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	6/25/2026		6/25/26 Strachan Consulting emailed letter to CPM 7/21/26: Requested confirmation of CPM approval email during 7/21 Teams Meeting
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			6/24/26: WSP emailed plan to CPM 7/28/26 approved by 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	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 of habitable space	Hydrostor	6/24/2026	7/8/2026	6/24/26: Strachan Consulting emailed to CPM Verification Timing Change request to 30 days prior to construction of inhabitable space. 8/5/26: CPM approved verification language timing change.
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	6/25/2026	7/23/2026	6/25/26: WSP emailed plan to CPM 7/3/26 Condition approval received--must include Mandatory Commercial Recycling Law (AB341) in Table 1. 7/22/26: WSP emailed revised plan to CPM 7/22/26: CPM email approval
TRANS-1(a)	Prepare a Construction Traffic Management Plan Provide copies of any comment letters received from Kern County, Caltrans, CHP, or any other interested agencies, along with any changes to the CTMP.	Submit the plan to the CPM along with copies of the transmittal letters sent to Kern County, Caltrans, and CHP for review and comment Provide the info to the CPM for review and approval.	At least 60 days prior to the start of construction	WSP	6/24/2026	8/6/2026	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 7/8/26: CPM conditional approval: permanent project construction will need to be expanded to include location of parking and staging, more details on ways to reduce employee trips- via carpooling, shuttles from hotels, etc., and procedures to restore damage to roadways from construction traffic. 7/22/26: Caltrans provided comments 8/6/26: WSP emailed Rev1 to CPM along with other agencies comments.
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			

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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			
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 approve/	Before construction begins	Hatch			
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	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
Lahanton RWQCB 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			
WATER-1	Prepare a Drainage Erosion and Sedimentation Control Plan (DESCP) for managing stormwater during Project construction	Submit the DESC to the CPM for review and to KC and Lahontan RWQCB, if required.	No later than 45 days prior to the October 1, 2026 rainy season for Early Works	WSP	8/7/2026		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 7/17/2026: Stormwater Management Report submitted to CPM 7/17/2026: CEC comments received 8/7/2026: Updated Stormwater Management Report submitted 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	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
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	5/26/2026	7/7/2026	2/20/26: LL email to CPM provided agreement; 6/26/26: Strachan Consulting submitted formally for compliance record. 7/21/26: CPM email confirming receipt of submittal
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	6/10/2026		6/10/26: Proof of payment of fees submitted to CPM.
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	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

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	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
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	2/20/2026	6/26/2026	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	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	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
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	4/15/2026 Rev0 6/9/26 Rev1 Final 8/3/26 Rev2 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 8/3/26: WSP emailed Rev2 to CPM
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	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 6/29/26: CPM provided comments 8/3/26: WSP submitted Rev 2

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	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
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	6/22/2026	7/14/2026	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 7/14/26: CPM email approval
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	6/30/2026	7/2/2026	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
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	4/15/2026	6/2/2026	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 6/22/26: Conditional approval received from DCBO -see NV5 memo with 3 topic areas that need to be addressed.
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	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	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	6/25/2026	7/13/2026	6/25/26 Strachan Consulting emailed information to CPM and copied DCBO 7/13/26: B. Fooks email indicates Condition is approved.
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		3/16/2026	Approval documented in 5/7/26 DCBO Weekly Status Report to HDS Project Management Team

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	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
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	With WSP to address comments	8/7/2026	6/24/26: WSP emailed plan to CPM 6/29/26 CPM provided comments 7/21/26: WSP emailed Rev1 to CPM 7/31/26: DCBO issued Conditional Approval 8/7/26: DCBO approval
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	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	7/10/2026	7/13/2026	7/10/26: Strachan Consulting emailed to the CPM 7/13/26: CPM email approval
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				7/21/26: Strachan Consulting submitted compliance filing to CPM 8/7/26: Strachan Consulting submitted letter from Kern County FD stating no further comments.
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	7/7/2026		7/7/26: Strachan Consulting emailed agreement to CPM with cc: to DCBO and KCFD 7/8/26: CPM granted conditional approval; must provide evidence of quarterly payments to KCFD in MCRs with first payment expected Jan 2027. Must also provide notification to CEC of delivery of USAR unit in next MCR after unit is delivered.

ATTACHMENT C

WRESC Air Quality Construction Mitigation Manager Monthly Report



Technical Memo

To: Hydrostor Willow Rock Environmental Compliance Manager
From: Alexa Beauchamp, AQCMM Delegate
CC: David Stein, Jeremy Paris
Project title Willow Rock Energy Storage Center
Client: Hydrostor
Project number: US0029687.5781
Subject: Air Quality Monthly Compliance Report – July 2026
Date: 08-07-2026

During July 2026, air quality compliance monitoring was conducted at the WRESC site in accordance with the Air Quality Construction Mitigation Plan. Monitoring activities included verification of fugitive dust control measures, including watering of active work areas and roadways as required, and review of onsite construction equipment to confirm compliance with applicable diesel emissions, equipment tagging, and idling requirements.

Based on site observations and compliance monitoring conducted during the reporting period, air quality control measures were effectively implemented and maintained. No air quality complaints, deviations from the Air Quality Construction Mitigation Plan, or other air quality compliance issues were identified during the reporting period.

AQ-SC3

During the reporting period, construction activities were conducted in compliance with AQ-SC3 fugitive dust control requirements. Dust suppression measures, monitoring activities, and required controls were implemented as specified in the Air Quality Construction Mitigation Plan. No unapproved deviations from AQ-SC3 requirements occurred during the reporting period.

AQ-SC3 Measure	Compliance Status	Compliance Actions / Comments
Part 1 - Active area watering	☒ Compliant ☐ N/A ☐ Corrective Action Required	Confirmed by AQCMM
Part 2 - Onsite speed limits/signage	☐ Compliant ☒ N/A ☐ Corrective Action Required	No onsite roads have been established



AQ-SC3 Measure	Compliance Status	Compliance Actions / Comments
Part 3 - Offsite access road speed limits/signage	☐ Compliant ☒ N/A ☐ Corrective Action Required	
Part 4 - Road dust suppression	☒ Compliant ☐ N/A ☐ Corrective Action Required	Confirmed by AQCM
Part 5 - Minimize disturbed areas	☒ Compliant ☐ N/A ☐ Corrective Action Required	Confirmed by AQCM
Part 6 - High wind dust controls	☐ Compliant ☒ N/A ☐ Corrective Action Required	No excessive dust or high winds noted during the period
Part 7 - Inactive area stabilization	☐ Compliant ☒ N/A ☐ Corrective Action Required	No inactive exposed areas
Part 8 - Disturbed area stabilization	☐ Compliant ☒ N/A ☐ Corrective Action Required	No disturbed areas requiring stabilization – watered localized holes dug for WJT relocation
Part 9 - Restricted vehicle access	☐ Compliant ☒ N/A ☐ Corrective Action Required	No disturbed areas
Part 10 - Permanent dust controls	☐ Compliant ☒ N/A ☐ Corrective Action Required	No disturbed areas requiring dust control
Part 11 - Stockpile stabilization	☐ Compliant ☒ N/A ☐ Corrective Action Required	No material stockpiled
Part 12 - Covered haul trucks/freeboard	☐ Compliant ☒ N/A ☐ Corrective Action Required	No material hauled
Part 13 - Track-out controls	☐ Compliant ☒ N/A ☐ Corrective Action Required	Track out controls will be installed as part of mobilization for Early Works
Part 14 - Equipment/truck cleaning	☐ Compliant ☒ N/A ☐ Corrective Action Required	No haul trucks in use. Only skid steer mounted tree spade for WJT relocation
Part 15 - Roadway cleaning	☐ Compliant ☒ N/A ☐ Corrective Action Required	No paved surfaces adjoining the site.
Part 16 - Portable equipment permits	☐ Compliant ☒ N/A ☐ Corrective Action Required	No applicable PERP equipment on site during the period
Part 17 - Notification signage	☒ Compliant ☐ N/A ☐ Corrective Action Required	Confirmed by AQCM



AQ-SC3 Measure	Compliance Status	Compliance Actions / Comments
Part 18 - Air quality complaints	☐ Compliant ☒ N/A ☐ Corrective Action Required	No complaints received
Part 19 - Stabilized access roads	☐ Compliant ☒ N/A ☐ Corrective Action Required	No site access roads installed in July
Part 20 - Runoff controls	☐ Compliant ☒ N/A ☐ Corrective Action Required	No active construction area adjacent to paved roadways.
Part 21 - Public roadway sweeping	☐ Compliant ☒ N/A ☐ Corrective Action Required	No paved public roadway within 500 feet of construction site access at this point

AQ-SC-4

No dust plumes concerns were noted during the month. No additional mitigation measures were necessary besides prescribed watering for dust suppression.

AQ-SC5

All diesel-fired construction equipment mobilized to the site were confirmed to be Tier 4 compliant, tagged and appropriately maintained. A letter from equipment owners listing onsite equipment and certifying that equipment was properly maintained is included. No additional actions were necessary to control diesel emissions.

Record Keeping FormMonth: **July****FORM D: Water Application onto Unpaved Roads & Equipment Areas**

Project Location: **WRESC** Size: _____ Miles or Acres (circle one)
Owner: **Hydrostor** Address _____ City: _____ Zip _____
Contact Person: **Alexa Beauchamp** Title: **AQCMM** Phone: **(832-387-4302**

Use this form to document daily water applications at the same or different areas. Use additional forms, as necessary.

Date	Time	Area Treated	Distance, Area, or Gallons Applied
6/28/26		Access roads: Dawn Rd (East and West of the 14), Dirt access road where trash pick up is taking place (currently the dirt road north of Dawn), Dirt access road where we are planting the trees (west of 14).	3,000 Gallons
6/28/26		Western Joshua Tree Areas	3,000 Gallons
6/29/26		Dust Control	3,000 Gallons
6/29/26		Western Joshua Tree Areas	3,000 Gallons
6/30/26		Dust Control	3,000 Gallons
6/30/26		Western Joshua Tree Areas	3,000 Gallons
6/31/26		Dust Control	3,000 Gallons
6/31/26		Western Joshua Tree Areas	3,000 Gallons

Comments:

**Bakersfield Area Office**

3005 James Road
Bakersfield, CA 93308

Phone: 661.399.3361
Estimating Fax: 661.399.3598
Main Fax: 661.399.0828

www.graniteconstruction.com

August 5, 2026
WSP
71 Stevenson Street
San Francisco, CA 94105

ATTN: David A. Stein, Senior Vice President Earth & Environment

RE: Willow Rock Hydrostor, H377059, GC Job 1910844
Monthly Compliance Report #6: Equipment On-Site

Granite mobilized the following heavy construction equipment to the Willow Rock Energy Storage Center Site in July 2026. The list below includes only construction equipment exceeding 50 hp.

Equipment Description	Greater than 50hp	Fuel
Pete 567 3AX Tractor	Yes	Diesel
Freightliner 2K Water Truck	Yes	Diesel
Freightliner 4K Water Truck	Yes	Diesel
Freightliner 4K Water Truck	Yes	Diesel
Ford F150 Supercab	Yes	Gas
Ford F250 Supercab	Yes	Gas
Ford F250 Supercab	Yes	Gas
Ford F150 Supercab 4X4	Yes	Gas
Ford F250 Crew Cab 4X4	Yes	Gas
Dodge 1500 Ram Pickup	Yes	Gas
Cat D6t Dozer Isco	Yes	Diesel
Jd 210G-EP Skiploader	Yes	Diesel
JD 317G Tracked Skid Steer	Yes	Diesel
Cat 140M3 Motor Grader	Yes	Diesel
Cat 623H Scraper	Yes	Diesel
Bobcat E88 Mini Excavator	Yes	Diesel

Granite hereby certifies that all of the above equipment was properly maintained while onsite.

All Correspondence for this project should be sent to Granite Construction Company, P.O. Box 5127 Bakersfield, CA 93308. Please do not hesitate to contact us if you have any questions or require additional information.

Sincerely,
GRANITE CONSTRUCTION COMPANY

Jeff Cox
Project Manager



August 5, 2026

RE: Willow Rock Energy Storage Center

To Whom It May concern:

J&M Land Restoration Inc. Mobilized the following heavy construction equipment to the Willow Rock Energy Storage Center Site in July 2026:

2026 Kubota Skidsteer SVL97-3HFC	Diesel 96.4 HP
2022 Kubota Skidsteer SVL97-2HFC	Diesel 96.4 HP
2022 Kubota skidsteer SVL97-2HFC	Diesel 96.4 HP

J&M Land Restoration hereby certifies that all of the above equipment was properly maintained while onsite.

You may contact me at (661) 872-7039 Should you have any questions regarding this information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Juetter', is written over a horizontal line.

John Juetter
Operations Manager

WILDLAND REVEGETATION SERVICES

1640 JAMES ROAD • BAKERSFIELD, CALIFORNIA 93308 • 661.872.7039 • 661.399.8882 FAX

WRESC EQUIPMENT ONSITE LEDGER												
Date	Number	Equipment Type	Manufacturer	Year	Equipment Number	Equipment Serial/PIN	Model Number	Motor HP	Engine Model Number	Contractor	Fuel	Checked for T4 Compliance?
07/27/2026	1	Skid Steer	John Deere	2024	448341	1P0317GJKRJ440173	317G	61.4	Yanmar 4TNV86CHT	Granite	Diesel	Y
07/27/2026	2	Tractor	Vermeer	2023	322312 (KP6Y95)	1VR4202UPP1006662	RTX450	49.0	Deutz 2.9L D Tier 4i	Granite	Diesel	Y
07/27/2026	3	Skid Steer	Kubota	2022	Unit 1	KBCZ06CKP1C76001	SVL97-2	96.4	V3800-TIEF4	J&M	Diesel	Y
07/27/2026	4	Motor Grader	John Deere	2015	6630 (DY8D99)	1DW770GXCF6666630	770G	255.0	John Deere PowerTech PSS 9.0L	Granite	Diesel	Y
07/27/2026	5	Mini Excavator	Bobcat	2023	295093	B4NM12461	E88	65.9	7245504A	Granite	Diesel	Y
07/27/2026	6	Skid Steer	Kubota	2022	GB 3080	KBCZ064CKP1C76001 - 2PE1720	SVL97-2	96.4	V3800-TIEF4	J&M	Diesel	Y
07/27/2026	7	Skipoader	John Deere	2025	508175	CH4E33B06305	210G	69.7	Yanmar 4TNV98CT-ZNJBL	Granite	Diesel	Y
07/27/2026	8	Water Truck	Freightliner (Daimler)	2019	145123	1FVHCYFC1LHLG8459	LW4000 WT	350-450	1FVHCYFC1LHLG8459	Granite	Diesel	Y
07/27/2026	9	Water Truck	Freightliner (Daimler)	2019	LDTN2VOCV04C	3ALACWFC2LDMF0972	LW4000 WT	350-450	3ALACWFC2LDMF0972	Granite	Diesel	Y
07/27/2026	10	Motor Grader	Caterpillar	2015	12-39942 (RY4535-4)	CAT0140MHN9M00577	140M3	200.0	Cat C9.3 ACERT	Granite	Diesel	Y
07/28/2026	11	Water Truck	Freightliner (Daimler)	2023	504459	3ALHCYD22RDUR4987	LW4000 WT	350-450	3ALHCYD22RDUR4987	Granite	Diesel	Y
07/30/2026	12	Dozer	Caterpillar	2025	20B	CAT000D6CSG601140	D6	215.0	Cat C9.3B	Granite	Diesel	Y
07/30/2026	13	Scraper	Caterpillar	2018	C-13	CAT0623KKWTB00259	623H	407.0	Cat C13 ACERT	Granite	Diesel	Y

ATTACHMENT D

WRESC DESIGNATED BIOLOGIST MONTHLY REPORT



Technical Memo

To: Hydrostor Willow Rock Environmental Compliance Manager
From: Kate Moss
CC: Jeremy Paris, David Stein
Project title Willow Rock Energy Storage Center
Client: Hydrostor
Project number: US0029687.5781
Subject: Designated Biologist Monthly Compliance Report - July 2026
Date: 08-10-2026

1. Introduction

WSP USA Inc. (WSP) is conducting pre-construction biological surveys and providing biological monitoring services for the Willow Rock Energy Storage Center (WRESC; 21-AFC-02) in accordance with the applicable California Energy Commission (CEC) Conditions of Certification (CoCs).

The purpose of this technical memorandum is to summarize onsite activities conducted between July 1 and July 31, 2026, including construction activities, pre-construction biological surveys and clearance sweeps, biological monitoring activities, and non-compliance issues. This technical memorandum is intended to address monthly reporting requirements outlined in CoCs BIO-2, BIO-5, BIO-6, and BIO-7.

2. Construction activities

Construction activities being undertaken at the WRESC site between July 1 and July 31 included garbage collection and removal, western Joshua tree (*Yucca brevifolia*) relocation, desert tortoise fencing installation, and office location preparation.

Garbage from illegal dumping had previously accumulated across the WRESC site. Removal of refuse was initiated on July 20, 2026, and continued through the end of July. Refuse was gathered using a skid steer and piled near Dawn Road for removal.

Desert tortoise exclusion fencing was installed by Granite Construction starting July 21, 2026, and continuing through the end of July. Fencing was installed by clearing a 10-foot-wide path along the fencing route using a bobcat excavator. Trenching for the fencing began on July 27, 2026.

The laydown area for site offices was prepared starting July 28, 2026, by clearing and grading the office site. Preparation for site offices continued through the end of July.

Western Joshua tree relocation started on July 29, 2026, and continued the rest of July. A tree spade was used to extract and remove trees.

3. Biological survey summary

Pre-construction biological surveys were conducted in accordance with the applicable CEC CoCs. These surveys were completed prior to project-related ground-disturbing activities to identify the presence or potential presence of sensitive biological resources in and adjacent to proposed work areas and to support the implementation of the applicable species-specific avoidance, minimization, and monitoring requirements. The following biological surveys and corresponding CoCs were conducted in July 2026:

- Big Mammals: BIO-22
- Crotch's Bumble Bee: BIO-13
- Desert Tortoise: BIO-16
- Nesting Birds: BIO-17
- Special-Status Reptiles: BIO-15

The results of biological surveys conducted to-date are provided in a separate report and summarized in Table 3-1.

Table 3-1 Biological Survey Summary

Survey	Dates and Timing	Results
Big Mammals	No more than 14 days prior to the start of project activities.	One potential desert kit fox den identified. Den considered unoccupied as entrance partially collapsed.
	July 6 – July 8	
	Early morning to mid-afternoon	
Crotch's Bumble Bee	Within 10 days of project site ground disturbance, with the surveys at least 4 days apart and the final survey conducted within two days of the planned vegetation or ground disturbance.	No Crotch's bumble bees observed.
	July 6 – July 8, July 15 – July 16	
	Mid-morning	
Desert Tortoise	Pre-construction surveys are completed during desert tortoise active season. Clearance surveys are conducted no more than one week prior to the initiation of ground-disturbing activities and within 24 hours of the start of construction.	No desert tortoise, tortoise sign, or burrows observed.
	July 13 – July 16, July 20	
	Sunrise to mid-afternoon	
Nesting Birds	Surveys are conducted no more than 14 days prior to the initiation of site mobilization, vegetation clearing, or ground disturbance. The second survey is conducted within three days of the start of clearing or ground disturbance activities.	Two active nests and 24 inactive nests were recorded over the two survey rounds. An active mourning dove nest was recorded in the buffer north of the active work area. The nest contained one egg. An active cactus wren nest was documented in a western Joshua tree. The nest was identified based on adult wrens carrying nesting material. Both active nests were reassessed as inactive during the second survey round.
	July 6 – July 8, July 18 – July 31	
	Early to mid-morning	
Special-Status Reptiles	Surveys occur one week prior to initiation of ground disturbance and again within 24 hours of commencing work.	No special-status reptiles observed.
	July 14 – July 15	
	N/A	

4. Biological monitoring summary

Biological Monitors were present during garbage collection, western Joshua tree relocation, desert tortoise fence installation, and office site preparation. Biological monitors conducted sweeps of areas prior to clearing and ground disturbance activities; inspected machinery mobilized to the site for soil, mud, and invasive species; and monitored work activities. Daily information was collected using Survey123 and photographs. Table 4-1 provides a summary of monitoring activities.

Table 4-1 Summary of Biological Monitoring Activity

Date	Monitor	Construction Activity	Issues recorded
July 20 2026	Tim Chumley	Garbage collection	Oil spill (See Section 5.0)
July 21 2026	Claire Bernd	Desert tortoise fence installation	NA
	Tim Chumley	Garbage collection	Oil spill (See Section 5.0)
July 22, 2026	Claire Bernd	Desert tortoise fence installation	NA
	Tim Chumley	Garbage collection	NA
July 23, 2026	Glen Kinoshita	Desert tortoise fence installation	NA
	Tim Chumley	Garbage collection	Racer observed but not removed
July 24, 2026	Glen Kinoshita	Desert tortoise fence installation	NA
	Tim Chumley	Desert tortoise fence installation	Relocated Mohave green rattlesnake (See Section 4.2)
July 27, 2026	Nathan Moorhatch	Garbage collection	NA
	Claire Bernd	Desert tortoise fence installation	NA
	Emily Urquidi	Desert tortoise fence installation	NA

Date	Monitor	Construction Activity	Issues recorded
July 28, 2026	Claire Bernd	Garbage collection	NA
	Emily Urquidi	Clearing at lay down yard and office trailers	Merriam's kangaroo rat relocated (See Section 4.2)
	Nathan Moorhatch	Desert tortoise fence installation	NA
July 29, 2026	Claire Bernd	WJT relocation	NA
	Emily Urquidi	Clearing at lay down yard and office trailers	NA
	Nathan Moorhatch	Desert tortoise fence installation	NA
July 30, 2026	Emily Urquidi	Clearing at lay down yard and office trailers	Desert spiny lizard relocated (See Section 4.2)
	Nathan Moorhatch	Desert tortoise fence installation	NA
	Tim Chumley	Garbage collection	NA
July 31, 2026	Emily Urquidi	Clearing at lay down yard and office trailers	NA
	Nathan Moorhatch	Desert tortoise fence installation and work at lay down yard and office trailers	NA

4.1 Incidental Wildlife Observations

Biological monitors incidentally observed 21 wildlife species between July 20 and July 31, including eight reptile, eight bird, and five mammal species (Table 4-2).



Table 4-2 Summary of Incidental Wildlife Observations

Common name	Scientific name	Status
Long-nosed leopard lizard	<i>Gambelia wislizenii</i>	NA
Side-blotched lizard	<i>Uta stansburiana</i>	NA
Mojave Glossy Snake	<i>Arizona elegans candida</i>	NA
Great Basin whiptail	<i>Aspidoscelis tigris tigris</i>	NA
Desert spiny lizard	<i>Sceloporus magister</i>	NA
Desert night lizard	<i>Xantusia vigilis</i>	NA
Red racer	<i>Masticophis flagellum piceus</i>	NA
Mohave green rattlesnake	<i>Crotalus scutulatus</i>	NA
Loggerhead shrike	<i>Lanius ludocivianus</i>	No federal or state listing Bird Species of Special Concern (priority 2)
Cactus wren	<i>Campylorhynchus brunneicapillus</i>	NA
Common Raven	<i>Corvus corax</i>	NA
Northern mockingbird	<i>Mimus polyglottos</i>	NA
Lesser nighthawk	<i>Chordeiles acutipennis</i>	No federal or state listing Bird Species of Special Concern (Priority 2)
Say's phoebe	<i>Sayornis saya</i>	NA
LeConte's thrasher	<i>Toxostoma lecontei</i>	Candidate species
Mourning dove	<i>Zenaida macroura</i>	NA
Desert woodrat	<i>Neotoma lepida</i>	NA
Merriam's kangaroo rat	<i>Dipodomys merriami</i>	NA
California ground squirrel	<i>Otospermophilus beecheyi</i>	NA
Desert cottontail	<i>Sylvilagus audubonii</i>	NA
White-tailed antelope squirrel	<i>Ammospermophilus leucurus</i>	NA



4.2 Wildlife Relocation

Three animals were relocated during the July 20 to July 31, 2026, period, none of which were special status species. Relocation efforts were undertaken following methods outlined in the Wildlife Protection and Relocation Plan:

- July 24 - a Mojave green rattlesnake relocated to Villa Haines.
- July 28 – a Merriam's kangaroo rat relocated to P2N
- July 30 – a Desert spiny lizard relocated to P2N

4.3 Wildlife mortality

No wildlife mortality was reported during the July 20 to 31 biological monitoring period.

5. Compliance

Table 5.1 summarizes issue compliance management for the period of July 20 to July 31, 2026

Table 5-1 Compliance Tracking

Issue	Date	Location	Description	Responsible Party	Classification of compliance	Corrective Actions	Trend
Spill	July 20	Dawn Road	During trash pickup a gallon jug of presumably used motor oil was dislodged from its roadside dumping site and spilled	NA	Notification	Spill was reported and cleaned up by J&M by removing contaminated soil and receptacles.	No
Spill	July 21	Dawn Road	An old spill involving gallons of used motor oil was detected during garbage removal. The spill was an historical occurrence and not associated with garbage removal activities.	NA	Notification	The old spill was reported and marked for cleanup	No

ATTACHMENT E

WRESC WORKER ENVIRONMENTAL AWARENESS TRAINING CERTIFICATION FORMS

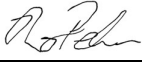
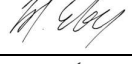
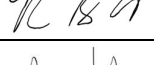
WEAP Training Acknowledgement Form

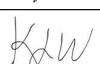
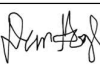
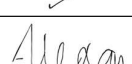


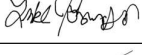
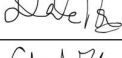
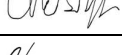
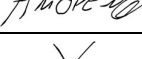
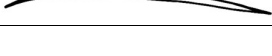
Willow Rock Energy Storage Centre Project, Kern County, California Workers Environmental Awareness Program (Biological, Paleontological and Cultural and Tribal Cultural Resources) Verification - All On-Site Employees.

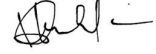
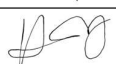
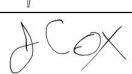
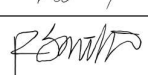
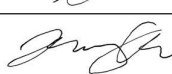
This is to certify the below-mentioned individuals have completed a mandatory California Energy Commission-approved Workers Environmental Awareness Program for Employees on site at the Willow Rock Energy Storage Centre Project. By signing below, the participants indicate that they understand and shall abide by the guidelines set forth in the Program materials. A helmet sticker will be provided to employees who have completed the WEAP training.

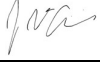
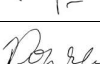
No ground disturbance shall occur prior to implementation of the WEAP program unless such activities are specifically approved by the CPM.

Date	Name (First and Last)	Company	Signature	Date
07/14/2026	Jeremy Paris	WSP		07/14/2026
07/15/2026	David Stein	WSP		07/15/2026
07/15/2026	Ray Pehrson	Cementation		07/15/2026
07/15/2026	Monika Eby	Hatch		07/15/2026
07/15/2026	Andrew Jones	Hatch		07/15/2026
07/15/2026	Jason L Sabey	Subsurface Energy Resources LLC		07/15/2026
07/15/2026	Noor Zanaid	WSP		07/15/2026
07/15/2026	Ryan Arp	WSP		07/15/2026
07/15/2026	Gabrielle Hindley	WSP		07/15/2026
07/15/2026	Glenn koester	WSP		07/15/2026
07/15/2026	Ryan smith	WSP		07/15/2026

Date	Name (First and Last)	Company	Signature	Date
07/15/2026	Zack Santen	Hydrostor		07/15/2026
07/15/2026	Christopher Singer	WSP		07/15/2026
07/15/2026	Kevin Wedman	NV5		07/15/2026
07/15/2026	Michael Wilcox	WSP		07/15/2026
07/15/2026	David Schroeder	WSP		07/15/2026
07/15/2026	Joseph Kemp	Hydrostor		07/15/2026
07/15/2026	Alan Saunders	Hatch		07/15/2026
07/15/2026	Jason Young	Hydrostor		07/15/2026
07/15/2026	Yassir Hamandi	Hatch		07/15/2026
07/15/2026	Nathan Moorhatch	WSP		07/15/2026
07/15/2026	Bernard Livet	Hatch		07/15/2026
07/15/2026	Nathan Dillon	Cementation		07/15/2026
07/15/2026	Sydney Broderick	WSP		07/15/2026
07/15/2026	Joanne Anderson	Hatch		07/15/2026
07/15/2026	Audrey Dessureault	Hydrostor		07/15/2026
07/15/2026	Dan Gonzalez	Hatch		07/15/2026
07/15/2026	Sarah Johnson	Hatch		07/15/2026
07/15/2026	Kurk Scantlin	Subsurface Energy Resources		07/15/2026
07/15/2026	Alexandra Labbate	WSP		07/15/2026
07/15/2026	Kristy Garnet	Hatch		07/15/2026
07/15/2026	Klaudio Hebibasi	Hydrostor		07/15/2026
07/15/2026	Austin Tate	SER/Cementation		07/15/2026
07/15/2026	Heather Vanderlip	Hatch		07/15/2026
07/15/2026	Spencer Withers	Cementation		07/15/2026

Date	Name (First and Last)	Company	Signature	Date
07/15/2026	Mark Van Dyken	SER		07/15/2026
07/15/2026	Eduardo Balandrano Guzman	Hatch		07/15/2026
07/15/2026	Jeffrey Porter	SER		07/15/2026
07/15/2026	Giovanni Cortolezzis	Hatch		07/15/2026
07/15/2026	Troy Melendez	NV5		07/15/2026
07/15/2026	Bruce Boyer	NV5		07/15/2026
07/15/2026	Brian Lovejoy	Hydrostor		07/15/2026
07/15/2026	Kyle smith	WSP		07/15/2026
07/15/2026	Jay Jacobsen	Hatch		07/15/2026
07/15/2026	Noah Eckert	Hydrostor		07/15/2026
07/17/2026	Eddie Figueroa	Hydrostor		07/17/2026
07/17/2026	Claire Bernd	WSP		07/17/2026
07/17/2026	Koya Oki	WSP		07/17/2026
07/17/2026	Betsy Mitton	WSP		07/17/2026
07/17/2026	Emily Urquidi	WSP		07/17/2026
07/17/2026	Alyssa Barkus	WSP		07/17/2026
07/17/2026	BENJAMIN MAILER	Hydrostor		07/17/2026
07/17/2026	Luke Johanson	WSP		07/17/2026
07/17/2026	Shannon Hunter	NV5		07/17/2026
07/17/2026	Dale Hameister	WSP		07/17/2026
07/17/2026	Charles Griffin	NV5		07/17/2026
07/17/2026	Hector Moreno Rodriguez	WSP		07/17/2026
07/17/2026	Tim Chumley	WSP		07/17/2026
07/17/2026	David King	WSP		07/17/2026

Date	Name (First and Last)	Company	Signature	Date
07/17/2026	Melanie Bukovac	WSP		07/17/2026
07/17/2026	Clayton Kraft	WSP		07/17/2026
07/17/2026	Buck Chamberlain	Subsurface Energy Resources		07/17/2026
07/17/2026	Sierra Harmening	WSP		07/17/2026
07/17/2026	Eric McElroy	Hydrostor		07/17/2026
07/16/2026	Simon Contreras	Hydrostor		07/16/2026
07/20/2026	Matthew Clements	Deluge Consulting		07/20/2026
07/20/2026	Glen Kinoshita	WSP		07/20/2026
07/20/2026	Joey pruet	Nexus		07/20/2026
07/20/2026	Heriberto Ortega	C&W construction		07/20/2026
07/20/2026	Jeff Cox	Granite		07/20/2026
07/20/2026	Gavin Horton	Granite Construction		07/20/2026
07/20/2026	Nicholas Davis	Granite Construction		07/20/2026
07/20/2026	Robert Smith	Granite		07/20/2026
07/20/2026	Garritt Palomo	Nexus		07/20/2026
07/20/2026	Gilbert Ward	C&w construction		07/20/2026
07/20/2026	Jade Jensen	Granite		07/20/2026
07/20/2026	Francisco Cano	J&M LandRestoration		07/20/2026
07/20/2026	Miguel Ceja	Hatch		07/20/2026
07/20/2026	Bradford (Andy) Nash	Granite		07/20/2026
07/20/2026	Jeremy Ogilvie	Granite Construction		07/20/2026
07/20/2026	Charles Braff	J&M land restoration		07/20/2026
07/20/2026	Emily Gonzalez	C&w		07/20/2026
07/20/2026	Clyde Burget	Granite Construction Co.		07/20/2026

Date	Name (First and Last)	Company	Signature	Date
07/20/2026	Francisco Lopez	C&W construction specialist		07/20/2026
07/20/2026	Mark Phillips	Granite construction		07/20/2026
07/20/2026	NEIL MEEKS	Deluge Consulting		07/20/2026
07/20/2026	Jose Aguiniga	C&W		07/20/2026
07/20/2026	Lisa Graham-Williams	J&M Land Restoration		07/20/2026
07/20/2026	Oscar Leon cebraeros	C&W		07/20/2026
07/20/2026	John Juette	J&M Land Restoration inc		07/20/2026
07/20/2026	Toribio Flores	J&M		07/20/2026
07/20/2026	RUSSELL ALLEN III	J&M land restoration		07/20/2026
07/23/2026	Jonathan Branoff	Hatch		07/23/2026
07/24/2026	Dozie (Preston Dozie Rukewe Willard Itie)	WSP		07/24/2026
08/02/2026	Nicholas Bizzell	WSP		08/02/2026

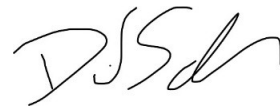
A total of 95 personnel were trained under the WEAP program during the period from July 14, 2026, through August 10, 2026.

Trainers:

WEAP Trainer – Biological Resources: Jeremy Paris

 , 8/10/2026

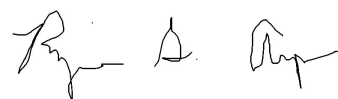
WEAP Trainer – Paleontological Resources: David Schroeder

 , 8/10/2026

WEAP Trainer – Biological Resources: Kate Moss

 , 8/10/2026

WEAP Trainer – Cultural Resources: Ryan Arp

 , 8/10/2026

ATTACHMENT F

WRESC PRS MONITORING SUMMARY AND DAILY MONITORING LOGS



Technical Memo

To: Hydrostor Willow Rock Environmental Compliance Manager
From: David Schroeder, Paleontological Resources Specialist
CC: Jeremy Paris, David Stein
Project title Willow Rock Energy Storage Center
Client: Hydrostor
Project number: US0029687.8172
Subject: Paleontological Monthly Compliance Report – July 2026 Construction Monitoring
Date: 08-10-2026

WSP USA Inc. (WSP) conducted paleontological monitoring for the WRESC Project (Project; Figure 1) in Kern County, California, for seven person days between July 23 and July 31, 2026. Paleontological monitoring was performed in compliance with the Project's approved Paleontological Resources Monitoring and Mitigation Plan (PRMMP). Monitoring efforts consisted entirely of Western Joshua Tree (WJT) relocation during the month of July. All monitoring was conducted by Dozie Itie, a California Energy Commission (CEC)-approved Paleontological Resources Monitor (PRM). A total of 45 WJT holes were excavated between July 28 and July 31, 2026 (Table 1; Figure 2). Excavated WJT holes averaged approximately 3 feet in diameter and between 3.5 and 4 feet deep. Project-related activities occurred in areas mapped as Quaternary windblown sand (Qs) and Quartz Monzonite (qm), both of which have a Potential Fossil Yield Classification (PFYC) of 2 or less but require monitoring when ground disturbance exceeds two feet in depth. No paleontological resources were observed during these activities.

Between July 23 and July 27, 2026, no ground-disturbing activities exceeding 2 feet in depth occurred in the Project area because WJTs were being prepped and watered for transport. Monitoring efforts during these dates consisted primarily of site orientation, WEAP and safety training, and standby observation. Surficial geologic observations included light brown sandy sediments that appeared generally intact, with localized surface disturbance due to modern debris.

Joshua tree relocation activities commenced on July 28, 2026, and continued through July 31, 2026, using a tree spade, skid steer, and water truck. Numerous excavations associated with tree removal and relocation were monitored, with most excavations ranging between approximately 2 and 4 feet in depth and 3 to 4 feet in width. Sediments exposed during monitoring were consistently described as light brown to light brown-orange sandy deposits with little variation across the Project area. Surface horizons exhibited disturbance from modern debris, while deeper sediments generally remained intact. On



July 31, minor caliche development was observed at the bottoms of some excavations, although caliche occurrence was limited and did not represent a substantial lithologic change.

A copy of all Daily Monitoring Logs from July 2026 are included in Appendix A.

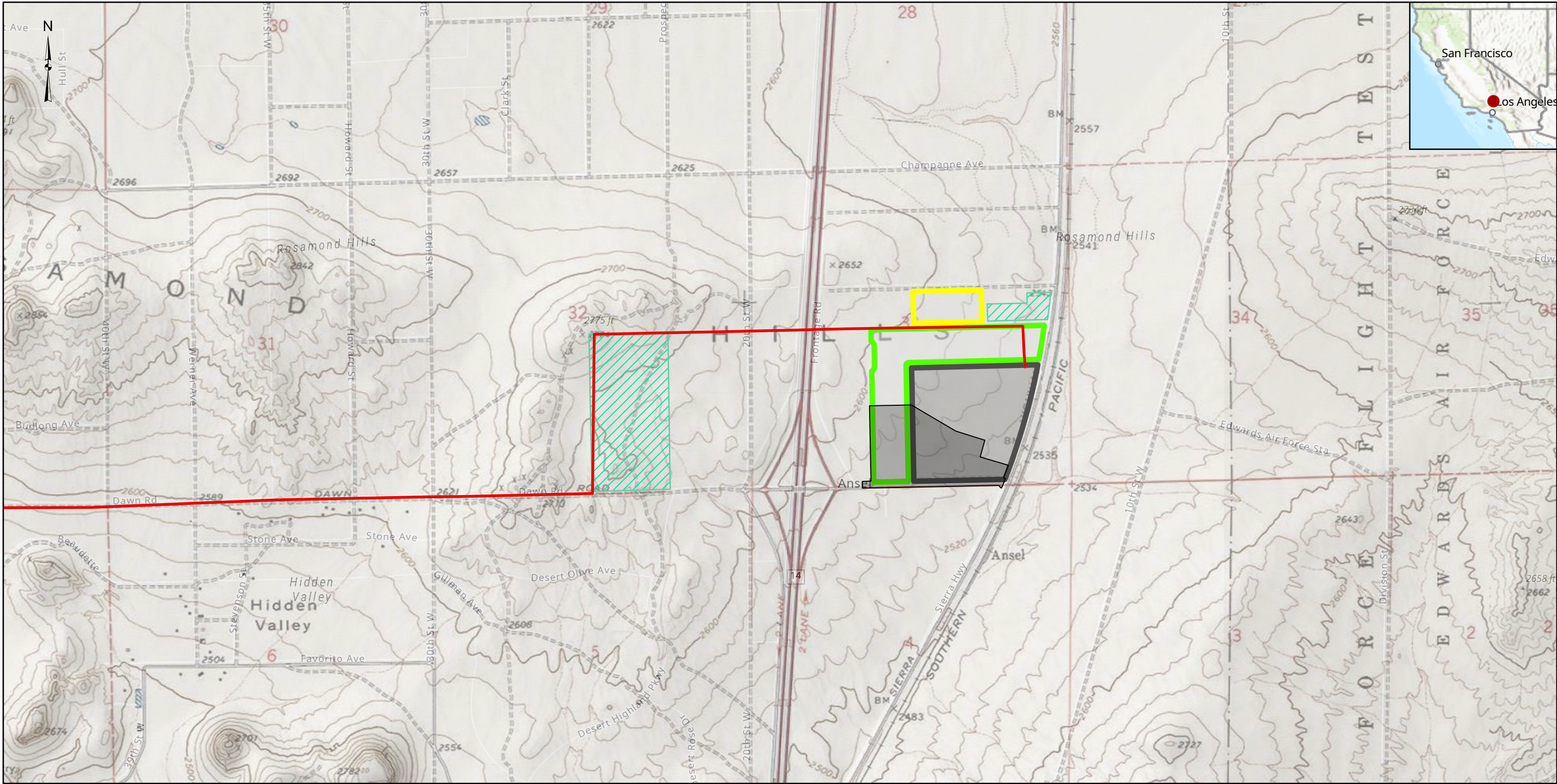
Table 1 Results of Paleontological Monitoring in July 2026

Date	Type of Ground-Disturbing Activity	Number of WJT Holes Monitored	Average Dimensions of Ground Disturbance	Geologic Unit / Geologic Description	Paleontological Resources Observed?
July 23, 2026	No excavation exceeding 2 ft; Joshua tree planting/relocation did not occur	0	No monitored disturbance >2 ft	Light brown sandy surface sediment; generally intact with minor modern debris present	No
July 24, 2026	No ground disturbance; tree relocation activities delayed	0	None	N/A	No
July 27, 2026	No earth disturbance exceeding 2 ft; Joshua tree relocation not yet initiated	0	None	N/A	No
July 28, 2026	Joshua tree relocation using tree spade, skid steer, and water truck	15	Approximately 2.7 ft deep × 3.5 ft wide	Light brown sandy sediment; generally intact below surface with minor modern debris disturbance	No
July 29, 2026	Joshua tree relocation excavations using tree spade, skid steer, and water truck	11	Approximately 3.2 ft deep × 4.1 ft wide	Light brown-orange sandy sediment; no observed sedimentary changes; surface disturbance from modern debris only	No

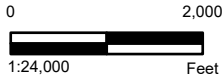


Date	Type of Ground-Disturbing Activity	Number of WJT Holes Monitored	Average Dimensions of Ground Disturbance	Geologic Unit / Geologic Description	Paleontological Resources Observed?
July 30, 2026	Joshua tree relocation excavations using tree spade, skid steer, and water truck	14	Approximately 2.8 ft deep × 4.0 ft wide	Light brown sandy sediment observed to approximately 3 ft depth; modern debris limited to surface horizons	No
July 31, 2026	Joshua tree relocation excavations using tree spade, skid steer, and water truck	15	Approximately 3.3 ft deep × 3.8 ft wide	Light brown, weakly indurated sandy sediment; minor caliche observed in some excavation bottoms; modern surface disturbance present	No

Figures



- LEGEND**
- Project Boundary**
- WRESC Site
 - P1
 - P2 North
 - Gen-Tie Line Alignment
 - Phase 1 Limits of Disturbance
 - Western Joshua Tree Relocation Sites



CLIENT
GEM A-CAES LLC

CONSULTANT



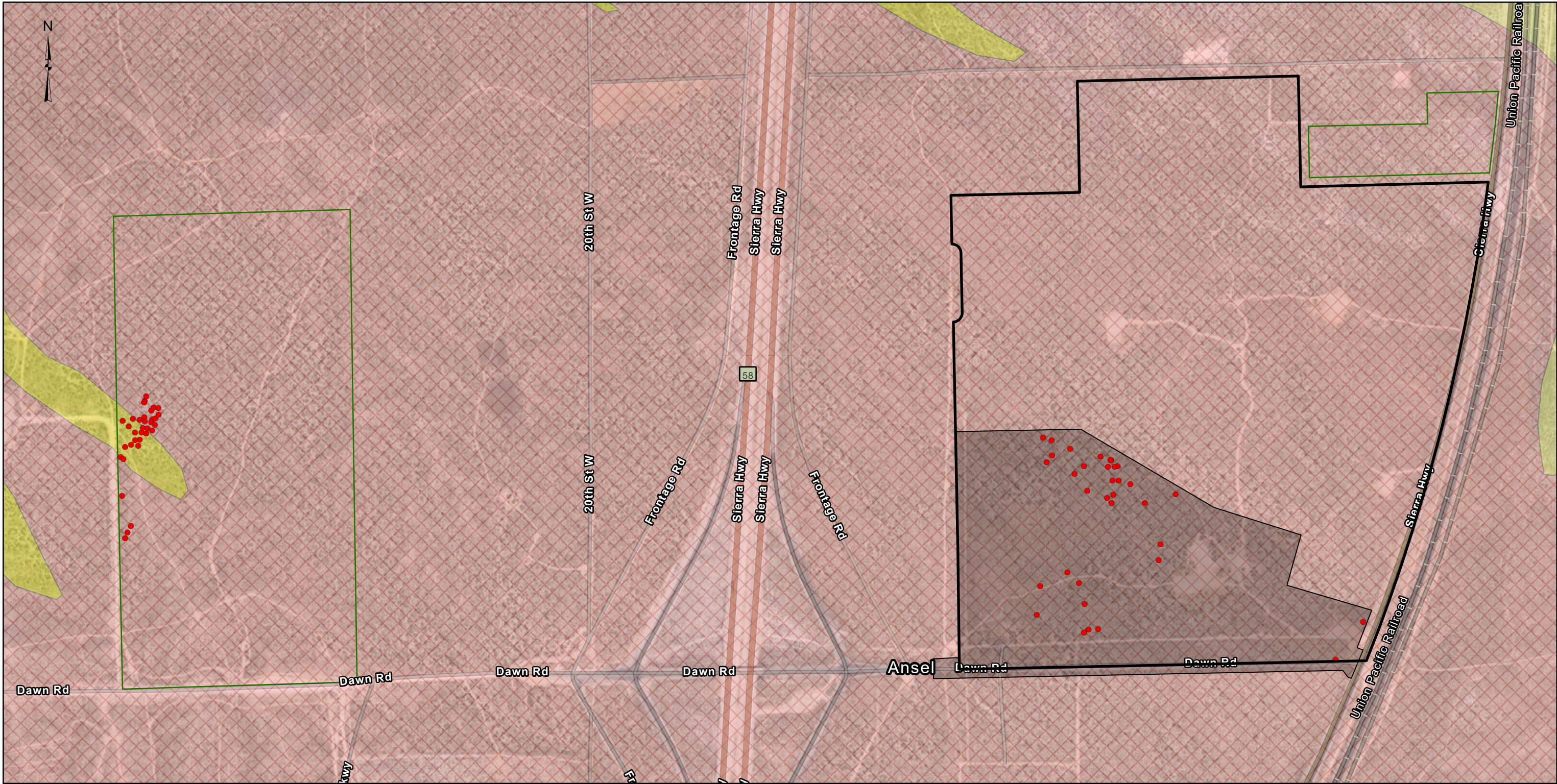
YYYY-MM-DD	2026-08-10
DESIGNED	MK
PREPARED	KO
REVIEWED	DS
APPROVED	DS

NOTE(S)

REFERENCE(S)
1. COORDINATE SYSTEM: WGS 1984 WEB MERCATOR AUXILIARY SPHERE
2. MAP SERVICE LAYER CREDITS: USA, STATE, BOUNDARIES: SOURCES: ESRI, TOMTOM, U.S. DEPARTMENT OF COMMERCE, U.S. CENSUS BUREAU
WORLD TOPOGRAPHIC MAP: SOURCES: ESRI, TOMTOM, GARMIN, FAO, NOAA, USGS, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY
WORLD HILLSHADE: ESRI, NASA, NGA, USGS, FEMA
USGS TOPO MAPS (MAP SERVICE): ESRI

PROJECT
WILLOW ROCK ENERGY STORAGE CENTER

TITLE
FIGURE 1 - PROJECT OVERVIEW MAP



LEGEND

- Project Boundary
- Phase 1 Limits of Disturbance
- Western Joshua Tree Relocation Sites

- Western Joshua Tree Relocation Holes

Geologic Units

- Qa - Alluvium
- Qs - windblown sand
- qm - Quartz monzonite

NOTE(S)



REFERENCE(S)
1. COORDINATE SYSTEM: WGS 1984 WEB MERCATOR AUXILIARY SPHERE
2. MAP SERVICE LAYER CREDITS: WORLD IMAGERY: VANTOR
HYBRID REFERENCE LAYER: SOURCES: ESRI, TOMTOM, GARMIN, FAO, NOAA, USGS, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY

CLIENT
GEM A-CAES LLC

CONSULTANT



YYYY-MM-DD	2026-08-10
DESIGNED	MK
PREPARED	KO
REVIEWED	DS
APPROVED	JP

PROJECT
WILLOW ROCK ENERGY STORAGE CENTER

TITLE
FIGURE 2 - PALEONTOLOGICAL MONITORING MAP



Appendix A Daily Monitoring Logs



WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	Company/Client:	Hydrostor
Date:	July 23, 2026	Time In:	06:00
Location:	Kern County, California	Time Out:	14:30
Prepared By:	Dozie (Preston Dozie Rukewe Willard Itie)		

Ground Disturbance Activity

No excavation went over 2ft.

Joshua Tree planing did not occur.

Geologic Description and Results

Light brown surface, appears intact, but has indication of modern debris from trash nearby.

The texture appears to be sand.

Paleontological Resource Discovery

N/A

General Impressions/Observations:

No paleontological activity.

Stayed on site just for site introduction and getting used to the area.

Photos

Photo

Attendance Record

Attendance Record

HATCH

NAME OF EVENT		
DURATION (HRS)		
FACILITATOR		
DATE	Start:	Finish:
TIMES		
VENUE		

PLEASE ENSURE THIS IS COMPLETED FOLLOWING YOUR TRAINING SESSION AND THEN FORWARDED TO THE HCLC COORDINATOR.

FULL NAME	COMPANY NAME	SIGNATURE
1. <i>Set Luce</i>	<i>Smallwood</i>	<i>Set Luce</i>
2. <i>Elizabeth Widdow-Reed</i>	<i>Ken Valley Christian Community</i>	<i>Elizabeth Widdow-Reed</i>
3. <i>Lisa Graham-Williams</i>	<i>J+M</i>	<i>Lisa Graham-Williams</i>
4. <i>Russell Allard</i>	<i>J&M</i>	<i>Russell Allard</i>
5. <i>Francisco Cano</i>	<i>J&M</i>	<i>Francisco Cano</i>
6. <i>Gustavo Pira</i>	<i>T&H</i>	<i>Gustavo Pira</i>
7. <i>Miguel Cesa</i>	<i>J&M</i>	<i>Miguel Cesa</i>
8. <i>SMARTIV Preciado</i>	<i>J&M</i>	<i>SMARTIV Preciado</i>
9. <i>Andrew Jinda</i>	<i>J&M</i>	<i>Andrew Jinda</i>
10. <i>Andy Nash</i>	<i>Granite</i>	<i>Andy Nash</i>
11. <i>Clyde Burget</i>	<i>Granite</i>	<i>Clyde Burget</i>
12. <i>Mark Phillips</i>	<i>Granite</i>	<i>Mark Phillips</i>
13. <i>Sam Rutter</i>	<i>NEXUS</i>	<i>Sam Rutter</i>
14. <i>Carrie Palmer</i>	<i>NEXUS</i>	<i>Carrie Palmer</i>
15. <i>Chris Singer</i>	<i>WSP</i>	<i>Chris Singer</i>
16. <i>Rebecca Litch</i>	<i>WSP</i>	<i>Rebecca Litch</i>
17.		
18.		
19.		
20.		

Photo Description
Sign in Sheet

Photo



Photo Description
Dozer

Monitor Signature:

[Handwritten signature]



WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	Company/Client:	Hydrostor
Date:	July 24, 2026	Time In:	06:00
Location:	Kern County, California	Time Out:	06:45
Prepared By:	Dozie (Preston Rukewe Willard)		

Ground Disturbance Activity

No ground disturbance due to Tree's still needing to be watered.,

Geologic Description and Results

N/A

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Safety Training finished

On Standby for the while day

Rattlesnake found and removes by Biological monitora

Photos

Monitor Signature:

A handwritten signature in black ink, appearing to be 'Dozie' or similar, written over a large, faint, light-gray watermark that reads 'WSP'.



WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	Company/Client:	Hydrostor
Date:	July 27, 2026	Time In:	06:00
Location:	Kern County, California	Time Out:	07:39
Prepared By:	Dozie Itie		

Ground Disturbance Activity

No Earth disturbance over 2ft and Joshua Tree's still beint wateree ane not ready for transport.

Geologic Description and Results

No sediment observation due to construction crew not ready for Joshua Tree's.

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Joshua Tree relocation expected for next week.

Photos

Monitor Signature:

A handwritten signature in black ink, appearing to be 'Dozie Itie', written over a light gray grid background.



WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	Company/Client:	Hydrostor
Date:	July 28, 2026	Time In:	06:00
Location:	Kern County, California	Time Out:	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Relocating Joshua Tree's

Equipment used- sked steer, water truck, and tree spade

#1 RA-20

2.5ft depth and 1.5ft L

2.

2.5 ft depth

3.5 ft width

3.

2.5 ft length

3.5 ft width

4. Near RA-17

3ft depth

2.5 width

5. Near Stick #10059 with orange tape

2.5 depth

3.5 width

#6

2ft deep

3ft wide

7.- Similar dimensions

8. Near RA-16

2ft deep

3ft wide



9. Similar Dimensions

10. 3ft dept
4ft 6 inches width

11. 4ft 6 inches wide
3ft 3 inches deep

10, 11, and 12 were near the same area

12. Depth 3ft 3in
Width 4ft

Geologic Description and Results

The majority of the hole were light brown sand sediment that appeared intact at 2ft or more. The sediment was only disturbed on the surface level from modern debris.

Paleontological Resource Discovery

N/A

General Impressions/Observations:

There doesn't appear to be any sediment changes or signs of Paleomaterial.

Additional Holes-

RB-1 dug out at 2pm

RA-16 take out at 2:20 pm

RA-15 dug out at 2:25 pm

RA 14- 3.5 depth, 4ft length

Photos

Photo



Photo Description
Skeed Steer

Photo



Photo Description
Removing Tree area

Photo



Photo Description
Removing Tree area

Photo



Photo Description
Measuring scale of Tree area

Photo



Photo Description
Removed Tree

Photo



Photo Description
Removed Tree

Photo



Photo Description
Example of removed Tree area

Photo



Photo Description
Skeed Steer

Monitor Signature:

[Handwritten signature]



WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	Company/Client:	Hydrostor
Date:	July 29, 2026	Time In:	06:00
Location:	Kern County, California	Time Out:	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Scraoeee was not montioered as it didn't reach 2ft in depth.

Joshua Tree Relocation

#1- Depth 3ft, Width- 4ft

#2-3ft Depth, Width- 4ft

#3- 2'9' depth , 4ft width

#4 RA-9, 3ft depth, 4.5th width

#5 RA-8, depth -4ft, width- 4'6 ft

#6 RA-8 , depth 3ft, width 3'6' ft

#7 RA-3, 3ft-depth, width-4ft

#8 3'7 ft depth, 4fr width

#9 3ft depth, 4ft width- near Sierra Highway and stick #10003

#10 3ft depth, 4ft wide

At 1pm machine fixed

#11, 3.6 depth and 4ft wide

Geologic Description and Results

Light brown orange sand sediment. Disturbance on top soil with modern debris.



No change in sediments.

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Project may take time due to lack of watering and machine breakdown

Photos

Photo



Photo Description

Skeed steer moving out the tree

Photo



Photo Description
Spade removing tree

Photo



Photo Description
Removed Joshua Tree

Photo



Photo Description
Joshua Tree

Photo



Photo Description
Removed Joshua Tree areq

Photo



Photo Description
Tree spade moving from the tree

Monitor Signature:

Doyle At



WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	Company/Client:	Hydrostor
Date:	July 30, 2026	Time In:	06:00
Location:	Kern County, California	Time Out:	14:30
Prepared By:	Preston Dozie		

Ground Disturbance Activity

Equipment used- Water Truck, Skeed Steer, , and tree spade

- 1- 3ft deep, 4ft 6 inches wide
- 2-RA-5, 3ft deeo, 4ft wide
- 3-2.5ft deep, 3ft wide
- 4.Depth 3'1 ft, 3ft 8 in.
- 5.Depth 3ft, Width 3ft 9 in
- 6.3ft depth, width 4 ft, 6 inches
- 7. 2ft 7 in.-3 ft 2 in depth, width 4ft 7 inches
- 8.Depth- 2ft 6in, Width 3ft 6inches
- 9.Depth 1ft 3in, 4ft wide
- 10.Depth- 3ft 1in, 3ft 8 inches wide
- 11.Depth-3 ft 8 inches, Width-4ft 1 inch
- 12.Depth 3ft Width 4ft 6 in
- 13.Depth 2ft 7 inches, Width 3ft 6inches
- 14.2ft 1inch- Depth, 4ft 3 inches- Width

Geologic Description and Results

Light brown sabd sediment from 3ft
Modern debris disturbance on surface level

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Trees still need to properly watered and may require more time

Consturction Managere pressuring for faster results

Photos

Photo



Photo Description
Skeed steer moving trees

Photo



Photo Description

Skeed Steer moving another tree

Photo



Photo Description

Excavated Joshua Tree area

Photo



Photo Description

Example of Excavated Joshua tree area

Photo



Photo Description

Site location

Monitor Signature:

A handwritten signature in black ink, consisting of several loops and strokes, positioned below the "Monitor Signature:" label.



WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	Company/Client:	Hydrostor
Date:	July 31, 2026	Time In:	06:00
Location:	Kern County, California	Time Out:	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Equipment- Water Truck, Skeed Steer Truck, and Tree Spade

1.Depth 3ft 1inches, Width 3ft 6inches

2.3ft 2inches, 3ft 1inch

3.3ft, 4ft

4.3 ft 2inches, 4ft 1 inches

5.3ft 1inches, 3ft 11 incges

6.3ft 2 inches, 4ft

7.3ft 1inch, 4ft 3inches

8. 3ft 1inch, 4ft

9.3ft 1 inch, 4ft

10.3ft 2inches, 4ft

11.3ft 2inches, 4ft

12.3ft 6inches, 4ft

13.4ft 1inch, 4ft

14.4ft 7 inches, 2ft 3inches

15.3ft 1 in., 3ft 7 in.

Geologic Description and Results

From 3ft from the surface, no disturbance change.

Some of the holes have caliche at the bottim, but its a low amount.

Disturbance on surface from modern debris.

The sediment appears light brown sand with low induration.

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Tree moving process slowing down to equipment issues.

Photos

Photo



Photo Description

Joshua tree

Photo



Photo Description
Skeed Steer lifting tree

Photo



Photo Description

Excavated hole

Photo



Photo Description
Excavated hole

Photo



Photo Description
Skid Steer moving trees

Monitor Signature:

Bruce Lee

ATTACHMENT G

WRESC CONSTRUCTION SAFETY SUPERVISOR MONTHLY REPORT

**Hydrostor
Willow Rock Energy Storage Centre****Monthly Construction Safety Report – July 2026**

This construction safety report records any incidents which occurred between July 20 – 31st, 2026.

Incidents and Observations		
Type	Number	Details
Recordables	0	-
First Aids	0	-
Near Misses	0	-
Vehicle	0	-
Personal Violations	0	-
Environmental	1	Environmental Observation: While grubbing and clearing for the temporary trailer access, dark soil was exposed which appeared to be dumping of oil. WSP/Deluge/J&M have contracted Clear Harbor for the clean-up and disposal efforts in accordance with our Spill Prevention, Control and Countermeasures Plan.
Other	0	-
Total Incidents	0	-

Additional comments:

Security efforts on site have been improved from 1 to 2 guards at night.