

DOCKETED

Docket Number:	21-AFC-02C
Project Title:	Willow Rock Energy Storage Center – Compliance
TN #:	271976
Document Title:	WRESC Request (#2) for Limited Notice to Proceed
Description:	N/A
Filer:	Chase Maxwell
Organization:	Climate Edge Law Group
Submitter Role:	Applicant Representative
Submission Date:	8/12/2026 1:51:51 PM
Docketed Date:	8/12/2026

August 12, 2026

Ms. Hurshbir Shahi
Program and Project Supervisor
California Energy Commission
Safety and Reliability Branch
Siting, Transmission, and Environmental Protection Division
715 P Street
Sacramento, CA

SUBJECT: WRESC (21-AFC-2C); LIMITED NOTICE TO PROCEED #2 REQUEST

Dear Ms. Shahi:

GEM A-CAES LLC ("GEM") is requesting the issuance of a Limited Notice to Proceed #2 ("LNT#2") for the Willow Rock Energy Storage Center for work in the Early Works area depicted in Figure 1. GEM is seeking approval of this LNT#2 by August 14, 2026. Work in the Early Works area under this LNT#2 would be restricted to the area that was approved previously with the California Energy Commission under the first Limited Notice to Proceed (NTP) executed July 17, 2026 (Attachment A). For ease of reference, the Early Works area is solely comprised of the project footprint located within the Desert Tortoise fencing and Dawn Road between Sierra Highway and SR-14. Activities to be conducted in this area under LNT#2 include:

- Site Mobilization
- Clearing and Grubbing
- Dawn Road Improvements
- Develop Early Works Area Stormwater Ponds
- Grade Early Works Area (subsurface area, laydown, parking, internal roads, Haul truck access and turnaround)
- Start Site Mobilization for Subsurface Construction (Air Shaft)

For LNT#2, GEM will have satisfied the Conditions of Certification (CoC's) requiring compliance prior to the initiation of construction, as specified in the Conditions. However, regarding the Drainage, Erosion, Sedimentation, and Control Plan (DESCP) pursuant to Conditions CIVIL-1 and WATER-1, the verification language timing for those conditions was modified as follows:

CIVIL-1

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.

WATER-1

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 DESC 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 DESC. The DESC shall be consistent with the grading and drainage plan as required by Condition of Certification **CIVIL-1**, and relevant portions of the DESC 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 DESC 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 DESC 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).

The DESC for the Early Works area was submitted on August 11, 2026. The Stormwater Management Report, which accompanies the DESC was submitted on July 17, 2026, with the full report responding to CEC comments submitted on August 7, 2026. The DESC will be updated to incorporate the Later Works area (the northern half of the site and the P1 and P2 construction laydown areas depicted in Figure 1) and submitted in September 2026. Given the site drainage (see Figure 2), GEM understands that the final NTP will not be issued until the DESC for the Later Works area is approved.

Please let me know if you have any questions.

Sincerely,



Noah Eckert
VP, Project Development
Interim Project Director, WRESC

Attachments:

Attachment A: WRESC Limited Notice to Proceed, July 17, 2026

Figure 1: Early Works and Later Works Areas

Figure 2: WRESC Site Drainage

ATTACHMENT A
LIMITED NOTICE TO PROCEED
JULY 17, 2026



July 17, 2026

Mr. Noah Eckert
VP, Project Development and
Interim Project Director of Willow Rock Energy Storage Center
1125 17th Street, Suite 700,
Denver, CO 80222

WILLOW ROCK ENERGY STORAGE CENTER (21-AFC-02C) LIMITED NOTICE TO PROCEED WITH CONSTRUCTION ACTIVITIES

On December 19, 2025, the California Energy Commission (CEC) approved a certification for the Willow Rock Energy Storage Center (21-AFC-02). On June 30, 2026, CEC staff received a request for a Limited Notice to Proceed (LNTP) to be issued for a portion of the Willow Rock Energy Storage Center.

The proposed activities include:

- Trash Removal
- Western Joshua Tree (WJT) Relocation
- Installation of Desert Tortoise Fencing
- Temporary Placement of Trailers

CEC staff has determined that the proposed activities may commence as of July 20, 2026, within the approved boundaries and in accordance with the applicable Conditions of Certification (COCs) from the Willow Rock Energy Storage Center Final Decision (Final Decision).

No other ground disturbing or construction activities are authorized at this time. Willow Rock Energy Storage Center will be given a full notice to proceed for all construction activities after all pre-construction COC submittals are received and approved as required by the CEC's Final Decision. CEC staff will continue to work closely with Hydrostor to ensure conformance with all COCs as written in the Final Decision.

If you have questions or concerns, please contact Compliance Project Manager Anwar Ali, Compliance Monitoring and Enforcement Unit, Safety and Reliability Branch, at (916) 839-0392 or e-mail at anwar.ali@energy.ca.gov.

Sincerely,

Brett Fooks

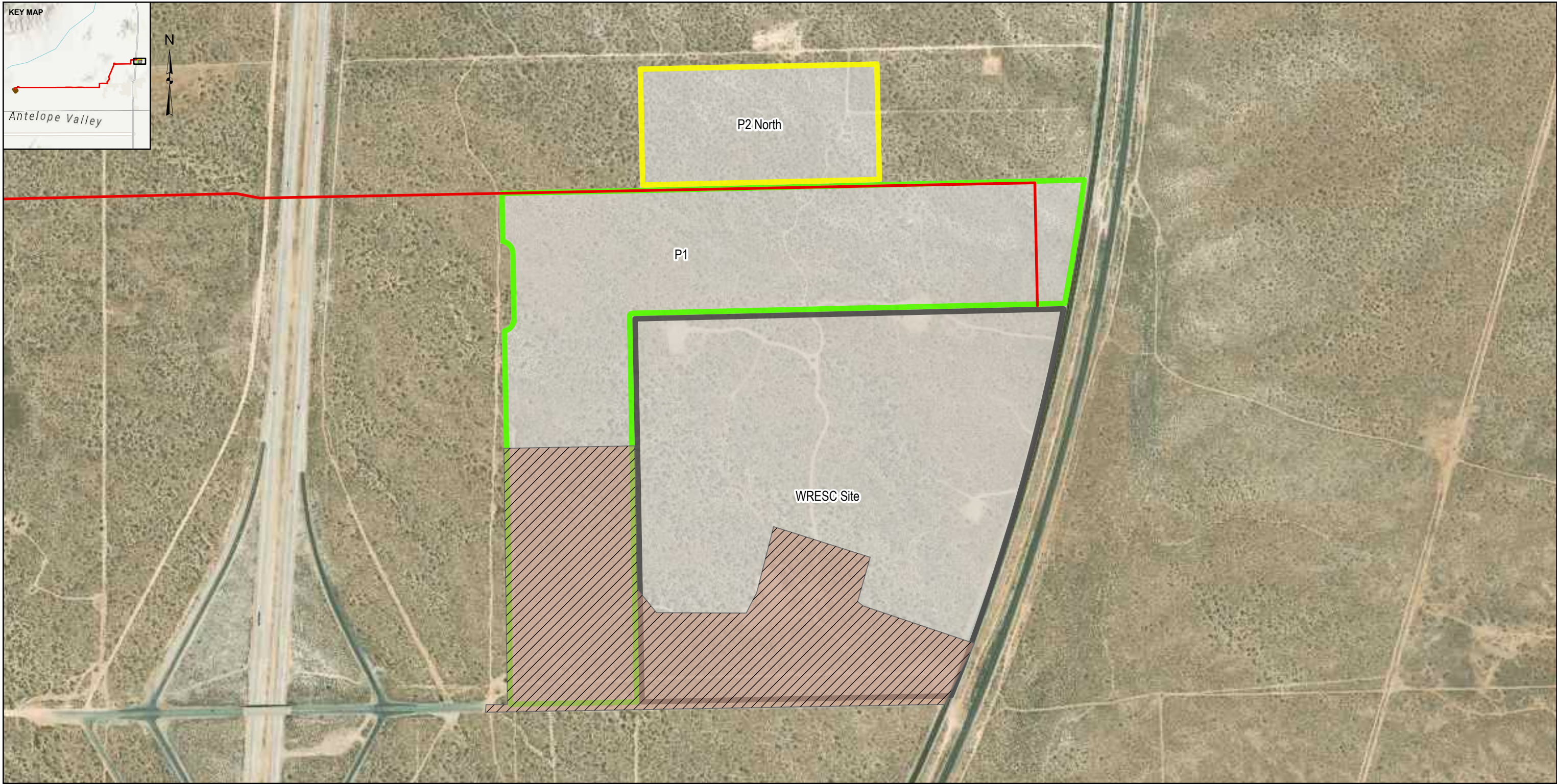
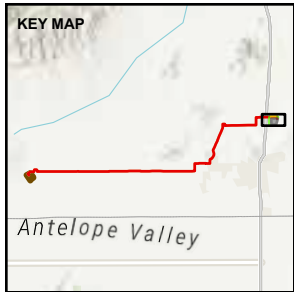
Brett Fooks, Manager
Compliance Monitoring and Enforcement Unit
Safety and Reliability Branch
Siting, Transmission and Environmental
Protection Division

cc: Dian Vorters
Deputy Director
Siting Transmission and Environmental
Protection Division

FIGURE 1

EARLY WORKS AND LATER WORKS AREAS

PATH: G:\Hydro\Aerial\09_PROJECTS\US0029687_5781_Hydro\Construction\Plans\08_Bldg_Construction_Plans_2026\02_PRODUCT\ONAPR\FIGURES\WJT_Relocation_Plan.aprx PRINTED: 4/29/2026 at 2:43 PM BY: USKO127008



LEGEND

 PROPOSED EARLY WORKS AREA

PROJECT AREA

 GEN-TIE LINE

PROJECT BOUNDARY

PERMANENT DISTURBANCE

 WRESC SITE

TEMPORARY DISTURBANCE

 P1 - TEMPORARY CONSTRUCTION LAYDOWN

 P2 NORTH - TEMPORARY CONSTRUCTION LAYDOWN



CLIENT
GEM A-CAES LLC

CONSULTANT



YYYY-MM-DD	2026-04-29
DESIGNED	MK
PREPARED	KO
REVIEWED	JP
APPROVED	JP

REFERENCE(S)
1. COORDINATE SYSTEM: NAD 1983 STATEPLANE CALIFORNIA V FIPS 0405 FEET
2. MAP SERVICE LAYER CREDITS: WORLD IMAGERY: VANTOR
WORLD TOPOGRAPHIC MAP: SOURCES: ESRI, TOMTOM, GARMIN, FAO, NOAA, USGS, © OPENSTREETMAP CONTRIBUTORS, AND THE
GIS USER COMMUNITY
WORLD HILLSHADE: ESRI, CGIAR, USGS

PROJECT
WILLOW ROCK ENERGY STORAGE CENTER

TITLE
**WILLOW ROCK ENERGY STORAGE CENTER PROJECT AND
PROPOSED EARLY WORKS AREA**

PROJECT NO.
US0029687.5781

REV.
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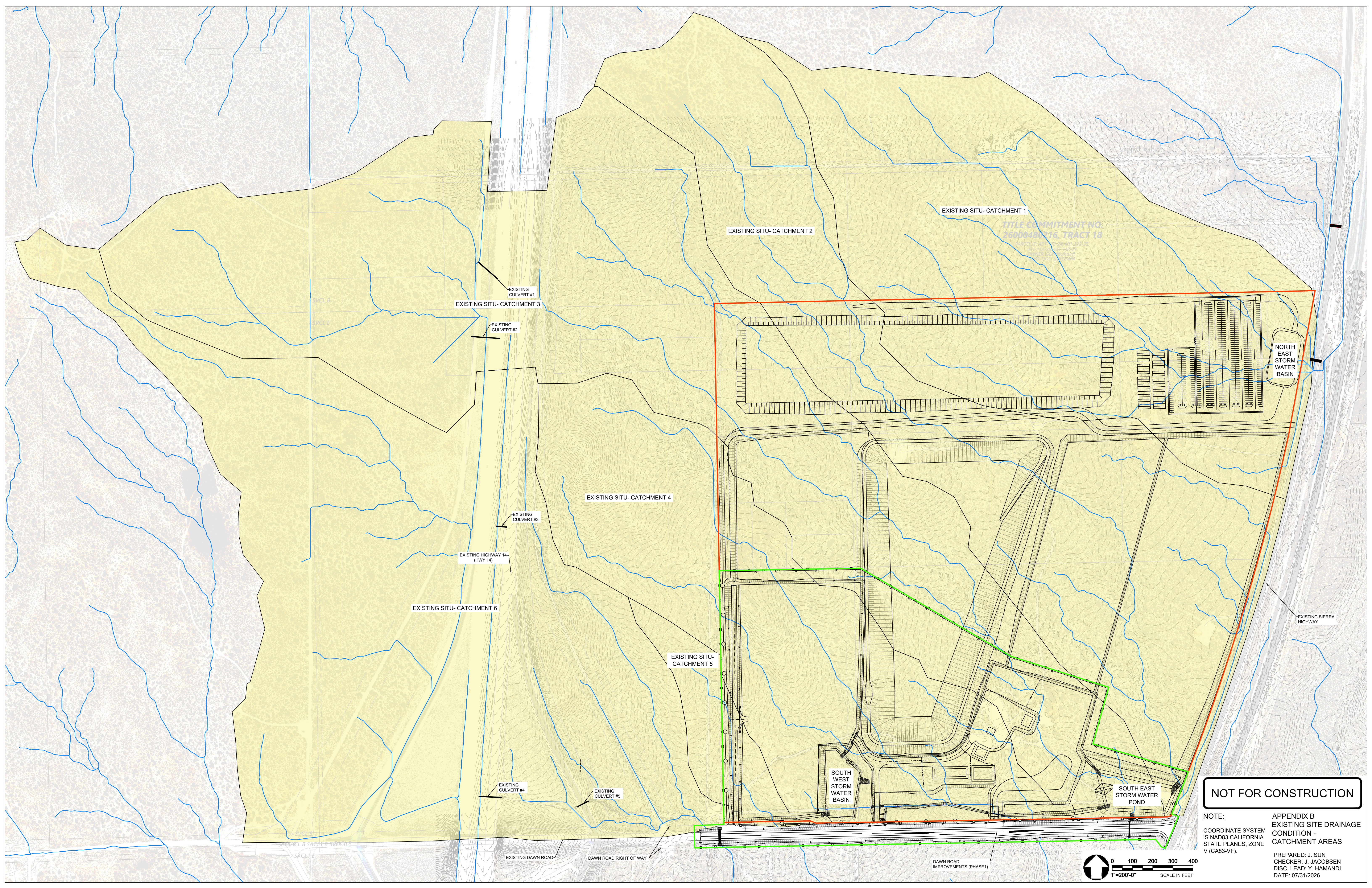
FIGURE
1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B

1 in

FIGURE 2

WRESC SITE DRAINAGE



NOT FOR CONSTRUCTION

NOTE:
COORDINATE SYSTEM
IS NAD83 CALIFORNIA
STATE PLANES, ZONE
V (CA83-VF).

APPENDIX B
EXISTING SITE DRAINAGE
CONDITION -
CATCHMENT AREAS

PREPARED: J. SUN
CHECKER: J. JACOBSEN
DISC. LEAD: Y. HAMANDI
DATE: 07/31/2026