

| <b>DOCKETED</b>         |                                                                                  |
|-------------------------|----------------------------------------------------------------------------------|
| <b>Docket Number:</b>   | 21-AFC-02C                                                                       |
| <b>Project Title:</b>   | Willow Rock Energy Storage Center – Compliance                                   |
| <b>TN #:</b>            | 272013                                                                           |
| <b>Document Title:</b>  | Repeated Application for Confidential Designation_Cultural Resource Sites Figure |
| <b>Description:</b>     | N/A                                                                              |
| <b>Filer:</b>           | Chase Maxwell                                                                    |
| <b>Organization:</b>    | Climate Edge Law Group                                                           |
| <b>Submitter Role:</b>  | Applicant Representative                                                         |
| <b>Submission Date:</b> | 8/17/2026 1:07:22 PM                                                             |
| <b>Docketed Date:</b>   | 8/17/2026                                                                        |

August 17, 2026

**E-Filed**

Mr. Drew Bohan  
Executive Director  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: Willow Rock Energy Storage Center (21-AFC-02C): Repeated Application for Confidential Designation of Cultural Resources Information**

Dear Mr. Bohan:

Pursuant to Title 20, section 2505(a)(4), of the California Code of Regulations, GEM A-CAES, LLC (the “Applicant”) hereby submits this Repeated Application for Confidential Designation for the following cultural resources information in support of the Willow Rock Energy Storage Center (“WRESC”):

- Cultural/Tribal Resources Prescribed Treatment Letter with WRESC Known Cultural Resource Sites Figure

The information will be submitted through the Commission’s confidential filings portal, concurrently with the docketing of this Application.

By letter dated December 13, 2021 the Executive Director approved the initial request for confidential designation of certain information relating to cultural resources for the Willow Rock Energy Storage Center pursuant to Title 20, section 2505(a)(3)(A), of the California Code of Regulations.<sup>1</sup> Subsequent repeated applications for confidential designation of additional information relating to cultural resources were approved by the Executive Director on June 22,

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<sup>1</sup> TN#: 241005.

2022,<sup>2</sup> July 6, 2022,<sup>3</sup> May 21, 2024,<sup>4</sup> July 16, 2024,<sup>5</sup> December 13, 2024,<sup>6</sup> April 14, 2025,<sup>7</sup> August 6, 2025,<sup>8</sup> and July 6, 2026.<sup>9</sup>

Please contact me at the email below should you have any questions or require additional information. Thank you for your attention to this important matter.

*I certify under penalty of perjury of the laws of the State of California the information described above is substantially similar to the previously submitted information and that all the facts and circumstances relevant to confidentiality remain unchanged to the best of my knowledge and belief after diligent review. I am authorized to make this repeated application and certification on behalf of the Applicant, GEM A-CAES LLC, a Limited Liability Company.*

Dated: August 17, 2026

CLIMATE EDGE LAW GROUP

/s/

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*Attorneys for GEM A-CAES, LLC*

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<sup>2</sup> TN#: 243633.

<sup>3</sup> TN#: 243853.

<sup>4</sup> TN#: 256496.

<sup>5</sup> TN#: 257761.

<sup>6</sup> TN#: 260663.

<sup>7</sup> TN#: 262671.

<sup>8</sup> TN#: 265360.

<sup>9</sup> TN#: 271264.