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Project Title:	Willow Rock Energy Storage Center – Compliance
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Organization:	Climate Edge Law Group
Submitter Role:	Applicant Representative
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October 12, 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 and Tribal Cultural Resources Monthly Compliance Report – September 2026 Construction Monitoring

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.[1] Subsequent repeated applications for confidential designation of additional information relating to cultural resources were approved by the Executive Director on June 22, 2022,[2] July 6, 2022,[3] May 21, 2024,[4] July 16, 2024,[5] December 13, 2024,[6] April 14, 2025,[7]

[1] TN#: 241005.
[2] TN#: 243633.
[3] TN#: 243853.
[4] TN#: 256496.
[5] TN#: 257761.
[6] TN#: 260663.
[7] TN#: 262671.

August 6, 2025,[8] July 6, 2026,[9] and September 8, 2026.[10] Please note that portions of the document may be able to be made public. The Applicant requests that the Commission coordinate with the Applicant to determine which portions are disclosable.

Please contact me at the email below should you have any questions or require additional information.

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: October 12, 2026

CLIMATE EDGE LAW GROUP

/s/

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[8] TN#: 265360.

[9] TN#: 271264.

[10] TN#: 272345.