

DOCKETED

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Project Title:	Willow Rock Energy Storage Center
TN #:	247218
Document Title:	CEC Response Letter to Willow Rock's Repeated Application for Confidentiality 10-13-22; TN 246530
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November 1, 2022

Via Email

Samantha Neumyer
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**Repeated Application for Confidential Designation for Phase II
Interconnection Study Document TN 246530
Docket No.: 21-AFC-02**

Dear Samantha Neumyer:

The California Energy Commission (CEC) has received WILLOW ROCK ENERGY STORAGE CENTER's (WRESC) (formerly GEM A-CAES, LLC's (GEM)) repeated application for confidential designation, dated October 13, 2022, (TN 246530) for documents submitted with the application described as Phase II Interconnection Study Documents. Documents submitted with the application are described in the docket as follows:

1. Attachment 3
2. Queue Cluster 13 Phase II – Attachment 1
3. Appendix A – Q1782
4. Queue Cluster 13 Phase 2 Attachment 2
5. Appendix H – SCD Results
6. Appendix G – Generation Sequencing Implementation (GSI)
7. SCE's Northern Hemisphere Import Nomogram Study
8. Area Report Appendix K
9. QC13 Phase 2 Area Report Appendix E
10. Queue Cluster 13 Phase II – Appendix B
11. Queue Cluster 13 Phase II – Appendix C
12. Queue Cluster 13 Phase II – Appendix D
13. Queue Cluster 13 Phase II – Appendix F
14. QC13 Phase II Appendix L-Subsynchronous Control Interaction Screening Assessment Report
15. Queue Cluster 13 Phase II Interconnection Study Report

The application states that confidential designation was granted on January 26, 2022, regarding information relating to the Phase I Interconnection Study, which is substantially similar to the information contained in the listed documents, and that all facts and circumstances relating to the prior determination of confidentiality remain unchanged. This assertion is made under penalty of perjury.

CEC regulations permit information be designated as confidential on these grounds. Specifically, California Code of Regulations, title 20, section 2505(a)(4) provides:

Repeated Applications for Confidential Designation. If an applicant is seeking a confidential designation for information that is substantially similar to information that was previously deemed confidential by the Commission pursuant to Section 2508, or for which an application for confidential designation was granted by the Executive Director pursuant to subdivision (a)(3)(A) of this section, the new application need contain only a certification, executed under penalty of perjury, stating that the information submitted is substantially similar to the previously submitted information and that all the facts and circumstances relevant to confidentiality remain unchanged. An application meeting these criteria will be approved.

The application for confidentiality previously submitted by Applicant regarding Phase I Interconnection Study documents was granted by letter dated January 26, 2022, based on California Code of Regulations, title 20, section 2505(a)(3)(A).

Therefore, Applicant has established the identified records qualify for confidential designation pursuant to California Code of Regulations, title 20, section 2505(a)(4).

Conclusion

Be advised that under the California Code of Regulations, title 20, section 2506, one may petition to inspect or copy records that the CEC has designated as confidential. A decision on a petition to inspect or copy records is issued by the CEC's chief counsel. Under the California Code of Regulations, title 20, section 2507, the executive director may disclose, or release records previously designated as confidential in certain circumstances. The procedures for acting on a petition and criteria for disclosing or releasing records previously designated as

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confidential are set in the California Code of Regulations, title 20, sections 2506 to 2507.

If you have any procedural questions regarding this application for confidential designation, please contact Kari Anderson, senior attorney, at kari.anderson@energy.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Drew Bohan', with a long horizontal flourish extending to the right.

Drew Bohan
Executive Director