

DOCKETED

Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	248215
Document Title:	Applicant's Notice Pursuant to CCR 1716(f) Regarding CURE Data Requests Set 1
Description:	N/A
Filer:	Amanda Cooley
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant Representative
Submission Date:	12/22/2022 2:53:35 PM
Docketed Date:	12/22/2022

STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:)
)
Application for Certification for the)
Willow Rock Energy Storage Center)
_____)

Docket No. 21-AFC-02

**APPLICANT’S NOTICE PURSUANT TO 20 C.C.R. § 1716(f) REGARDING
CALIFORNIA UNIONS FOR RELIABLE ENERGY DATA REQUESTS SET 1**

Jeffery D. Harris
Samantha G. Neumyer
Ellison, Schneider Harris & Donlan LLP
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
(916) 447-2166 (Phone)
(916) 447-3512 (Fax)

Attorneys for Applicant

**STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission**

In the Matter of:)
)
Application for Certification for the) Docket No. 21-AFC-02
Willow Rock Energy Storage Center)
)
_____)

**APPLICANT’S NOTICE PURSUANT TO 20 C.C.R. § 1716(f) REGARDING
CALIFORNIA UNIONS FOR RELIABLE ENERGY DATA REQUESTS SET 1**

Pursuant to Section 1716(f) of the California Energy Commission (“CEC”) regulations, GEM A-CAES LLC (“the Applicant”) hereby provides this notice that additional time is required to respond to certain data requests set forth in California Unions for Reliable Energy (“CURE”) Data Requests Set 1 issued on December 7, 2022 (TN#: 247982).

Because several of CURE’s data requests involve information specific to the configuration of Willow Rock undergoing refinement as part of project optimization, additional time is needed to respond to these requests. Other data requests require additional survey information or the preparation of new reports based on information already available to the Applicant. Moreover, it is increasingly clear that the unavailability of multiple key personnel in December due to the holidays necessitates that we provide notice of need for additional time.

The Applicant anticipates that a response to these data requests will be provided on or before Monday, January 23, 2023.

Dated: December 22, 2022

Respectfully submitted,

ELLISON SCHNEIDER HARRIS & DONLAN LLP

By 

Jeffery D. Harris
Samantha G. Neumyer
2600 Capitol Avenue, Suite 400
Sacramento, California 95816
Telephone: (916) 447-2166
Facsimile: (916) 447-3512

Attorneys for Applicant