

**DOCKETED**

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

In the Matter of:

**WILLOW ROCK ENERGY STORAGE  
CENTER**

Docket No. 21-AFC-02

**CALIFORNIA UNIONS FOR RELIABLE ENERGY  
STATUS REPORT NO. 4**

December 23, 2022

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Attorney for California Unions for  
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California Unions for Reliable Energy (“CURE”) submits this status report pursuant to the Committee Scheduling Order issued on August 31, 2022. In its Scheduling Order, the Committee ordered the parties to file and serve a Status Report on or before the 26th of each month.

CURE is reviewing the AFC, the Applicant’s responses to CEC Staff’s data requests and other documents docketed in the proceeding. CURE is currently engaged in discovery. On December 12, 2022, CURE entered a nondisclosure agreement with the Applicant that will govern CURE’s access to records designated confidential by the Commission. In addition, on December 7, 2022, CURE filed its Data Requests Set 1. The Applicant’s responses are due on January 6, 2023. CURE anticipated reviewing those responses and identifying whether additional data requests are needed prior to the January 9, 2023 discovery deadline. However, the Applicant filed a notice pursuant to 20 C.C.R. section 1716(f) that additional time is required to respond to the data requests and that it anticipates responding to the data requests on or before January 23, 2023. In addition, the Applicant anticipates responding to some of Staff’s data requests after the current discovery deadline and providing other responsive materials and surveys in summer 2023. Therefore, discovery is ongoing.

Based on previous status reports filed by CEC Staff, CURE understood that that CEC Staff intended to file a motion to extend the discovery deadline. Staff’s Status Report #4 dated December 23, 2022 states that it

expects to file “a joint stipulation to extend discovery beyond the 180 days described in the applicable regulations.” CURE supports an extension of the discovery deadline for all parties. The undersigned contacted the parties to propose that CURE be a party to any stipulation extending the discovery deadline. The Applicant stated that they have no objection to CURE’s participation in the stipulation. CURE seeks to review the proposed stipulation and reach an agreement regarding extending the discovery period. Alternatively, CURE intends to file a motion to extend the discovery period.

Dated: December 23, 2022

Respectfully submitted,

/s/ Richard M. Franco

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