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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

**Joint Statement by California Energy Commission staff (CEC Staff), Gem
A-CAES LLC (Applicant) and California Unions for Reliable Energy
(Intervenor) Re: Data Requests**

CEC Staff and Intervenor are currently engaged in discovery efforts as part of their analysis of the Application for Certification for the Willow Rock Energy Storage Center. Further data requests are anticipated by the parties. Regarding the requirement in California Code of Regulations, title 20, section 1716(e) that all requests for information be submitted no later than 180 days from the date the commission determines an application is complete, the parties have agreed that requests for information regarding all topic areas may be made up to May 1, 2023, or 90 days after the Applicant files any updated project description, whichever is later, and still be considered timely. In addition, for geology and biological resources, any party may request additional information up to 30 days beyond the date Applicant submits final reports associated with the geological evaluation effort and necessary biological surveys.

On Behalf of Gem A-CAES LLC



Samantha Neumyer
Ellison Schneider Harris & Donlan LLP

On Behalf of California Energy
Commission Staff



Kari Anderson
Senior Staff Counsel
California Energy Commission

On Behalf of California Unions for Reliable
Energy



Richard M. Franco
Adams Broadwell Joseph & Cardozo