

DOCKETED

Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	250259
Document Title:	Applicant's Notice Pursuant to 20 CCR § 1716(f) for CURE Data Requests Set 2
Description:	N/A
Filer:	Amanda Cooley
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant Representative
Submission Date:	5/22/2023 4:17:22 PM
Docketed Date:	5/22/2023

**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)
FOR CURE DATA REQUESTS SET 2**

Jeffery D. Harris
Samantha G. Neumyer
Ellison Schneider Harris & Donlan LLP
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
E-Mail: jd@eslawfirm.com
E-Mail: sgn@eslawfirm.com
Telephone: (916) 447-2166

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)
FOR CURE DATA REQUESTS SET 2**

Pursuant to Sections 1003 and 1716(f) of the California Energy Commission’s regulations, GEM A-CAES LLC (the “Applicant”) hereby provides this notice that additional time is required to respond to the California Unions for Reliable Energy Data Requests Set 2, Data Requests 83-85, 87, 92-93, 96-98, 101-105, 110-117, 119-120, 122-123, 125, 127-130, and 132.¹

I. NEED FOR ADDITIONAL TIME TO RESPOND

A. Data Requests 83-85, 87, 92-93, 96-98, 125, 127-130

Data Requests 83-85, 87, 92-93, 96-98, 125, 127-130 request information either regarding project optimization, or that are affected by project optimizations activities. Additional time is required to respond to these data requests because the Applicant is actively working to complete project optimization activities, including ongoing analysis and consideration of geotechnical data information obtained from the drilling program. Once the Applicant completes project optimization activities, the Applicant will provide a schedule for its responses to Data Requests 83-85, 87, 92-93, 96-98, 125, 127-130 and other data requests

¹ TN#: 249932.

relating to project optimization, which we expect will be within 30-60 days following the project optimization filing for most of these data requests.

B. Data Requests 101-105, 110-117, 119-120, 122-123, 132

The Applicant is currently in the process of completing sensitive plant and other biological resources surveys. Because Data Requests 101-105, 110-117, 119-120, 122-123, and 132 request information that will either not be available until such surveys are completed, or that will depend on the final reports that will be generated from the biological resources surveys, additional time is required to respond to these data requests. The Applicant expects to provide a response to these data requests within approximately 30 days following the docketing of the final reports for the biological resources surveys currently being conducted.

Dated: May 22, 2023

Respectfully submitted,

ELLISON SCHNEIDER HARRIS & DONLAN LLP

By  _____

Jeffery D. Harris
Samantha G. Neumyer
Attorneys for Applicant