

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. 10**

June 26, 2023

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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 filed Data Requests Set 2 (TN 249932) on May 1, 2023, for technical information related to the following environmental topics: Geology, Air Quality, Public Health, Noise, and Biological Resources. On May 22, 2023, GEM A-CAES LLC (“Applicant”) filed a notice pursuant to California Code of Regulations, title 20, sections 1003 and 1716(f) (TN 250259) stating that it would require additional time beyond the usual 30 days from the date that the request is made for CURE’s Data Requests 83-85, 87, 92-93, 96-98, 101-105, 110-117, 119-120, 122-123, 125, 127-130, and 132. The Applicant’s notice proposed new deadlines of 30-60 days following the project optimization filing for Data Requests 83-85, 87, 92-93, 96-98, 125, 127-130 and within 30 days following the docketing of the final reports for the ongoing biological resources surveys for Data Requests 101-105, 110-117, 119-120, 122-123, 132.

Responses to all other data requests not referenced in the Applicant’s request for additional time were provided by the Applicant on May 31, 2023 (TN 250418). On June 5, 2023, counsel for CURE and counsel for Applicant had a meet and confer about Applicant’s request for additional time to respond to Data Requests 119-120 and response to Data Request 53, as well

as the “project optimization filing” referenced in Applicant’s notice pursuant to California Code of Regulations, title 20, sections 1003 and 1716(f) (TN 250259). The issues were resolved during this meet and confer.

CURE and its consultants will evaluate the Applicant’s responses to CURE’s Data Requests Set 2, once filed, and assess new information docketed by the Applicant related to surveys of sensitive plants and other biological resources, geotechnical investigation, and project optimization. Based on the Applicant’s responses to CURE’s Data Requests Set 2 and any new information, CURE may submit additional data requests for information pertaining to biological resources, geologic resources, and/or project optimization.

Dated: June 26, 2023

Respectfully submitted,

/s/ Tara C. Rengifo

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