

DOCKETED

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June 30, 2023

Commissioner Andrew McAllister, Presiding Member
Commissioner Noemi Gallardo, Associate Member
Hearing Officer Rene Webster-Hawkins
Hearing Officer Ralph Lee
California Energy Commission
715 P Street Project
Sacramento, CA 95814-5512

RE: Willow Rock Energy Storage Center (21-AFC-02)

Dear Commissioner McAllister, Commissioner Gallardo, and Hearing Officers:

On behalf of GEM A-CAES, LLC (the “Applicant”), we thank the California Energy Commission (“CEC”) Staff for their professionalism and clear statement of their recommendations for next steps in this proceeding set forth in the Status Report #10 filed on June 23, 2023.¹

As the Applicant continues to expend considerable resources on Project Optimization, we agree with the Staff’s request in their June 23, 2023 Status Report to pause their work on the Willow Rock Energy Storage Center Application for Certification until the Applicant files the Project Optimization information, including geological and engineering reports. Staff’s proposal is reasonable and efficient. Moreover, all Parties to this proceeding are protected as to discovery and related procedural matters through the *Joint Statement by California Energy Commission staff (CEC Staff), Gem A-CAES LLC (Applicant) and California Unions for Reliable Energy (Intervenor) Re: Data Requests* docketed on January 6, 2023.² Accordingly, a Staff motion and a Committee order are not necessary.

We understand and appreciate that the Applicant’s substantial, continuing data collection and engineering efforts are not entirely visible to the Staff, the Intervenor, Kern County, and other interested entities. While we are not yet ready to present the Project Optimization resulting from this ongoing work, we are encouraged by our findings and conclusions to date. In that connection, the Project Applicant wants to confirm that the Project continues to expend considerable time, money, and resources on Project Optimization to advance this important

¹ TN#: 250720.

² TN#: 248337.

project. As just one example, the Applicant has spent over two thousand hours on the ground in various locations in Kern County this spring with its trained professionals documenting and affirming biological resources, cultural resources and other baseline conditions. While not visible yet, the data collection and supporting analyses continue in earnest.

While this substantial work is still subject to due diligence and compilation for presentation, we are encouraged by our findings and conclusions to date. In particular, recent geological investigations at a location outside the Application For Certification project site are demonstrating superior geological conditions for the compressed air cavern. Once we have finished evaluating the results, we will be in a position to complete Project Optimization and docket these results.

Once the data has been processed and compiled for docketing, we will wish to convene the Committee, the Staff, the Intervenor, and the public to discuss our vision for the Willow Rock Project and the permitting path forward. We would, of course, like to pursue the most expeditious path forward that satisfies the Governor, Legislature, and Commission's collective vision for public participation, environmental protection, a decarbonized and reliable electric grid, and the satisfaction of all applicable laws, ordinances, regulations, and standards.

Given these facts and protections of interest, we affirm that a Staff motion and Committee Order are not required as we advance this important long duration energy storage project forward through Project Optimization. The Applicant also agrees to continue to provide monthly Status Reports and does not object if Staff or the Intervenor discontinue until after the filing of the Project Optimization.

Thank you for your attention to these important matters.



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