

**DOCKETED**

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**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 )  
 )  
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**WILLOW ROCK ENERGY STORAGE CENTER  
STATUS REPORT NO. 12**

Pursuant to the *Order Suspending the Application for Certification Proceeding and Further Orders* (the “Orders”) docketed August 11, 2023,<sup>1</sup> GEM A-CAES LLC (“the Applicant”) hereby submits this status report to inform the Committee regarding the progress of the Application for Certification (“AFC”) proceeding for the Willow Rock Energy Storage Center (“Willow Rock”).

As directed by the Committee in the Orders, the deadlines set in the August 26, 2022, Scheduling Order are stayed, and the parties are to refrain from submitting any further data requests.<sup>2</sup> In addition, the parties are relieved of the requirement to respond to any outstanding data requests.<sup>3</sup> Nevertheless, the Applicant will use the data requests as informational guides in preparing the supplemental AFC.

As indicated in the Orders, the Applicant will file a single supplemental AFC with the updated project description “...and all required elements of the application reflecting any and all project modifications to satisfy the information requirements for an application as detailed in Appendix B to Article 6 of Title 20 in the California Code of Regulations.”<sup>4</sup>

Project optimization efforts remain ongoing and are being diligently pursued by the Applicant, as reflected in the Applicant’s past Status Reports, as well as the Applicant’s *Response to Motion to Suspend the Application for Certification Proceeding*.<sup>5</sup> As summarized in the Orders and reported in the Applicant’s Status Report No. 11,<sup>6</sup> the Applicant is actively considering alternative surface facility configurations, cavern engineering options given the site geotechnical results, and alternate sites that may better support the cavern design. Alternative

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<sup>1</sup> TN #: 251599.

<sup>2</sup> Orders, Ordering Paragraph 2, p. 3.

<sup>3</sup> Id.

<sup>4</sup> Orders, Ordering Paragraph 3, p. 3.

<sup>5</sup> TN #: 251186.

<sup>6</sup> TN#: 251175; TN #: 251599, p. 2.

sites include adjacent and offsite properties in the area with potentially more favorable geologic conditions. As reported in its most recent Status Report, the Applicant anticipates that it will file a supplemental AFC in accordance with the Orders by the fourth quarter of this year.

The Applicant appreciates the Committee's leadership in advancing this important long duration energy storage project and doing so in a way that will optimize the project and the benefits it will bring to the State of California. The Applicant also appreciate the professionalism of CEC Staff and the California Unions for Reliable Energy as the Applicant works to optimize the project.

Dated: August 25, 2023

Respectfully Submitted,

ELLISON SCHNEIDER HARRIS & DONLAN LLP

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