

**DOCKETED**

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<b>Project Title:</b>	Willow Rock Energy Storage Center
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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. 13**

Pursuant to the *Order Suspending the Application For Certification Proceeding And Further 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 (“Project”).

**PROJECT OPTIMIZATION**

As reported in *Status Report No. 12*, the Applicant is continuing project optimization efforts, including an updated Project Description. The Applicant is in the process of preparing a supplemental AFC and is targeting filing in the fourth quarter this year<sup>2</sup>, which will include the results of biological and cultural resources surveys that were recently completed and described in the previous Status Report. Significant progress continues to be made on the Project, including the following recent development milestones:

- Coordinating with local stakeholders regarding compliance with new Western Joshua Tree Conservation Act requirements, including the establishment of a mitigation plan to meet these requirements;
- Revising technical impact analyses for air quality, transportation, visual resources, waste management and other resource areas based on the optimized site layout and positioning;
- Negotiating site control agreements for adjacent land parcels to provide laydown and staging optionality;
- Finalizing land survey work, and conducting initial design basis for a transmission line preferred route, in consultation with Kern County, as well as definition of alternative routes;

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

<sup>2</sup> The Applicant is also closely monitoring the California Public Utilities Commission *Order Instituting Rulemaking to Continue Electric Integrated Resource Planning and Related Procurement Processes* (docket# R.20-05-003), in conjunction with the storage development industry, which could enable compliance flexibility on Long Lead-Time projects, which would include the Willow Rock Energy Storage Center. The timing of the AFC submission will be assessed on the basis of the optimized Project Description milestones relative to the amount of compliance flexibility granted.

- Entering final stages of Front End Engineering Design work to advance engineering, procurement, and construction contract negotiations, including union labor considerations associated with Project Labor Agreement discussions; and
- Advancing commercial agreements for adaptive reuse of cavern rock.

These activities are in addition to significant ongoing progress on commercial offtake agreements beyond the 200 MW energy storage agreement announced earlier this year, efforts to advance shortlisting in procurement processes, and bilateral discussions for the balance of the offtake. The Project is also in negotiations with Southern California Edison and the California Independent System Operator (“CAISO”) on the near-term execution of its Large Generator Interconnection Agreement that includes the Deliverability of the full 500 MW project output to the CAISO grid.

The Applicant will continue to file Status Reports on or before the 26<sup>th</sup> of each month with an update regarding the Project’s status.

Dated: September 26, 2023

Respectfully Submitted,

ELLISON, SCHNEIDER HARRIS & DONLAN LLP

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