

**DOCKETED**

<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	253300
<b>Document Title:</b>	Willow Rock Energy Storage Center Status Report No 15
<b>Description:</b>	N/A
<b>Filer:</b>	Amanda Cooley
<b>Organization:</b>	Ellison Schneider Harris & Donlan LLP
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	11/22/2023 2:15:14 PM
<b>Docketed Date:</b>	11/22/2023

**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 )  
\_\_\_\_\_ )

**WILLOW ROCK ENERGY STORAGE CENTER  
STATUS REPORT NO. 15**

Pursuant to the *Committee Scheduling Order* (“Scheduling Order”) 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**

The Applicant is in the process of preparing a supplemental AFC that incorporates the revised Project Description for the Project and is targeting a filing in the fourth quarter of this year or the first quarter of next year.

Of particular note, the Applicant has continued its engagement with stakeholders regarding the revised Project Description, with significant progress on confirming key aspects of project optimization. Notably, this includes control of a geologically-optimized site capable of interconnection at the Whirlwind substation. This includes:

- Strong geological characterization of the optimized site, with confirmation as to cavern suitability.
- Suitable assessment of transmission pathways, adaptive reuse of waste rock, and establishment of necessary site control specific to the local characteristics, as well as building on the work of the AFC submitted and meeting plant characteristics required for the delivery of storage to the California Independent System Operator (“CAISO”) grid.

The Applicant expects to announce further locational details in the coming weeks, and is currently targeting to file in Q1-2024, per the Committee’s direction, “...a single supplemental AFC when it is prepared to update the 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>2</sup> The anticipated timing of the Supplemental AFC corresponds with expected timelines clarifying compliance flexibility of Long-Lead Time resources (which would include

---

<sup>1</sup> *Order Suspending The Application For Certification Proceeding And Further Orders*, TN#: 251599.

<sup>2</sup> *Id.*, p. 3.

the Willow Rock Energy Storage Center) as highlighted through recent filings in California Public Utilities Commission proceeding R.20-05-003.

As described in *Willow Rock Energy Storage Center Status Report No. 14*,<sup>3</sup> significant progress continues to be made on all aspects the Project and supplemental AFC. Recent additional milestones include:

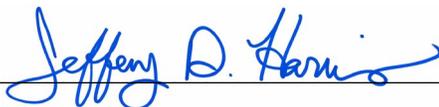
- Continued participation of Project in additional offtake contracting initiatives, including ongoing discussions through shortlisting in procurement processes with load-serving entities.
- Continued negotiations for water supply arrangements for both construction and operation.
- Continued commercial progress on adaptive reuse of cavern rock regionally. Inclusion of alternate layouts based on adaptive reuse of cavern rock as well as consideration of beneficial reuse to meet regional demand.
- Participation in the Kern County Energy Summit, and ongoing stakeholder and community engagement.
- Anticipated execution of Large Generator Interconnection Agreement by December 2023.

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: November 22, 2023

Respectfully Submitted,

ELLISON, SCHNEIDER HARRIS & DONLAN LLP

By  \_\_\_\_\_

Jeffery D. Harris

Samantha G. Neumyer

[jdh@eslawfirm.com](mailto:jdh@eslawfirm.com)

[sgn@eslawfirm.com](mailto:sgn@eslawfirm.com)

Attorneys for Applicant

---

<sup>3</sup> TN#: 252786.