

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	254905
<b>Document Title:</b>	WRESC Supplemental AFC Repeated Application for Confidential Designation of Cultural Resources Information
<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>	3/7/2024 2:16:28 PM
<b>Docketed Date:</b>	3/7/2024



March 7, 2024

Mr. Drew Bohan  
Executive Director  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: Willow Rock Energy Storage Center (21-AFC-02): Repeated Application for Confidential Designation of Cultural Resources Information**

Dear Mr. Bohan:

Pursuant to Title 20, section 2505(a)(4), of the California Code of Regulations, GEM A-CAES, LLC (the “Applicant”) hereby submits this Repeated Application for Confidential Designation for the following cultural resources information, submitted in support of the Supplemental Application for Certification that incorporates the revised Project Description for the Willow Rock Energy Storage Center (21-AFC-02):

- Cultural Resources Assessment of Willow Rock Energy Storage Center (“WRESC”) Advanced Compressed Air Energy System (A-CAES) Project
- Appendix A: Records Search Results
- Appendix B: Native American Consultation
- Appendix C: Survey Results Figures
- Appendix D: DPR 523-Series Forms
- Appendix E: Previous Studies

By letter dated December 13, 2021, pursuant to Title 20, section 2505(a)(3)(A), of the California Code of Regulations, the Executive Director approved the initial request for confidential designation of certain documents relating to cultural resources within the WRESC area, including confidential literature and archival research submitted by the Applicant.<sup>1</sup>

The documents listed above contain cultural resources information that is substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged. Out of an abundance of caution, the Applicant is also including within this repeated application documents relating to the Native American consultations that have been conducted on behalf of the Applicant to date. The

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<sup>1</sup> TN#: 241005.

Applicant seeks confidential designation for the cultural resources information described above on the same basis for the prior approval made by the Executive Director.

The Applicant notes that portions of the documents above may contain general or other information that can be made publicly available or provided in a redacted version. If needed, the Applicant requests that CEC Staff work with the Applicant to prepare redacted versions of the documents identified above that can be made available for public disclosure.

*I certify under penalty of perjury of the laws of the State of California the information described above is substantially similar to the previously submitted information and that all the facts and circumstances relevant to confidentiality remain unchanged. I am authorized to make this repeated application and certification on behalf of the Applicant, GEM A-CAES LLC, a Limited Liability Company.*

Please contact us at (916) 447-2166 should you have any questions or require additional information. Thank you.

Dated: March 7, 2024

ELLISON SCHNEIDER HARRIS & DONLAN LLP

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/s/

Jessica L. Melms  
Samantha G. Neumyer

Attorneys for Applicant