

DOCKETED	
Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	254951
Document Title:	Amended Cover Letter and Attestation of Completeness
Description:	N/A
Filer:	Amanda Cooley
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant Representative
Submission Date:	3/8/2024 4:43:49 PM
Docketed Date:	3/8/2024



March 8, 2024

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

RE: Willow Rock Energy Storage Center (21-AFC-02): Amended Cover Letter and Attestation of Completeness

Dear Mr. Bohan:

In accordance with the Committee's August 9, 2023, order¹ (the "Committee Order") and subsequent clarification and request by the Hearing Officer,² GEM A-CAES LLC ("the Applicant") hereby submits this amended cover letter and attestation of completeness for the Supplemental Application for Certification ("Supplemental AFC") for the Willow Rock Energy Storage Center. The Supplemental AFC contains the updated project description and elements of the AFC that reflect the updated project description.

The Committee Order provides, in pertinent part, that the Supplemental AFC should "satisfy the information requirements for an application as detailed in Appendix B to Article 6 of Title 20 in the California Code of Regulations."³ The Committee Order further provides that "Along with all amended sections of the application and related appendices, Applicant shall submit a cover letter attesting to the completeness of the supplemental AFC."⁴

The filing process began on March 1, 2024, with the upload of the primary volumes comprising the Supplemental AFC. I am pleased to confirm that the Applicant finished uploading the Supplemental AFC, including supporting information on March 8, 2024.⁵ If CEC Staff identifies any missing information during its 30-day review of the Supplemental AFC, the Applicant will expeditiously work to provide the missing information.

Per the Hearing Officer's request and to facilitate review by the Committee, California Energy Commission Staff, and stakeholders, provided below are tables of the filings that comprise the Supplemental AFC. Table 1a includes all Supplemental AFC filings to date that have been assigned a Transaction Number (TN #) by the Docket Office.⁶

¹ TN #: 251599.

² TN#: 254900.

³ Id., Ordering Paragraph 3.

⁴ Id.

⁵ The Applicant notes that there have been some technical issues associated with the noise modeling files and is confirming with CEC Staff that they have the appropriate software to access the files. The Applicant will continue to work with CEC Staff to resolve this, and any other potential issues with the uploaded files.

⁶ To the extent that the Committee finds it relevant, the Applicant also incorporates by reference TN# 242224 dated March 8, 2022, and TN# 241503 dated February 9, 2022.



HYDROSTOR

Table 1a: Filings that Comprise the Supplemental AFC With Assigned TN #		
TN #	Docketed Date	Document Title
254774	3/1/2024	Supplemental AFC Cover Letter and Data Adequacy Worksheets
254806	3/1/2024	Willow Rock Energy Storage Center SAFC - Volume 1, Part A
254805	3/1/2024	Willow Rock Energy Storage Center SAFC - Volume 1, Part B
254812	3/4/2024	Willow Rock Energy Storage Center SAFC Volume II-Appendix 1A-51F
254811	3/4/2024	Willow Rock Energy Storage Center SAFC Volume II-Appendix 52A-53B
254804	3/1/2024	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part I
254803	3/1/2024	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part II
254802	3/1/2024	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part III
254801	3/1/2024	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part IV
254800	3/1/2024	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part V
254799	3/1/2024	Willow Rock Energy Storage Center Supplemental AFC Volume II - Appendix 54A - Part VI
254807	3/1/2024	Willow Rock Energy Storage Center SAFC Volume II- Appendix 56A-510A
254829	3/4/2024	Willow Rock Energy Storage Center SAFC Volume II - Appendix 511A-Part I
254828	3/4/2024	Willow Rock Energy Storage Center SAFC Volume II - Appendix 511A - Part II
254810	3/1/2024	Willow Rock Energy Storage Center SAFC Volume II-Appendix 513A-514A
254809	3/1/2024	Willow Rock Energy Storage Center SAFC Volume II-Appendix 515A-Part I
254808	3/1/2024	Willow Rock Energy Storage Center SAFC Volume II-Appendix 515A-Part II
254813	3/4/2024	Hi Res Figures V1 File 1 of 2
254814	3/4/2024	High Resolution Figures WRESC SAFC 2 of 2
254815	3/4/2024	2023 DESERT TORTOISE SURVEY
254816	3/4/2024	WRESC BIOLOGICAL RESOURCES ASSESSMENT REPORT
254817	3/4/2024	WRESC Burrowing Owl Focused Survey Report
254818	3/4/2024	WRESC Mojave Ground Squirrel Report
254819	3/4/2024	WRESC Jurisdictional Delineation
254821	3/4/2024	WRESC Western Joshua Tree Report 1 of 2
254820	3/4/2024	WRESC Western Joshua Tree Report 2 of 2
254897	3/7/2024	WRESC Application to the Eastern Kern Air Pollution Control District
241428	12/2/2021	CONFIDENTIAL Appendix 3A, Interconnection Study Documents
242799	4/5/2022	Att DA20-1 A-CAES Historical Operational Summary
246751	8/25/2022	Confidential Attachment DR95-1_C132-North-Q1782-TOT 1002-Gem-Appendix A



Table 1a: Filings that Comprise the Supplemental AFC With Assigned TN #		
TN #	Docketed Date	Document Title
246752	8/25/2022	Confidential Attachment DR95-1_QC13PII-SCE-Northern-Q1782TOT 1002-Gem-Appendix A-Attachment 1
247183	10/13/2022	Confidential Queue Cluster 13 Phase II Interconnection Study Report Attachment DR95-1_C132-North-Q1782-TOT 1002-Gem-Appendix A
247182	10/13/2022	Confidential QC13 Phase II Appendix L - Subsynchronous Control Interaction Screening Assessment Report
247181	10/13/2022	Confidential Queue Cluster 13 Phase II – Appendix F
247180	10/13/2022	Confidential Queue Cluster 13 Phase II – Appendix D
247179	10/13/2022	Confidential Queue Cluster 13 Phase II – Appendix C
247178	10/13/2022	Confidential Queue Cluster 13 Phase II – Appendix B
247177	10/13/2022	Confidential QC13 Phase 2 Area Report Appendix E
247176	10/13/2022	Confidential Area Report Appendix K
247175	10/13/2022	Confidential SCE's Northern Hemisphere Import Nomogram Study
247174	10/13/2022	Confidential Appendix G - Generation Sequencing Implementation (GSI)
247173	10/13/2022	Confidential Appendix H – SCD Results
247172	10/13/2022	Confidential Queue Cluster 13 Phase 2 Attachment 2
247171	10/13/2022	Confidential Appendix A – Q1782
247170	10/13/2022	Confidential Queue Cluster 13 Phase II – Attachment 1
247169	10/13/2022	Confidential Attachment 3
240751-23	12/1/2021	AFC Volume 1, Alternatives Section ⁷

The following documents and supporting information described in Table 1b have not yet been assigned a Transaction Number (“TN #”) by the CEC’s Docket Office and were submitted either: (1) under an application for confidential designation, which are currently pending review or (2) through the CEC’s Kiteworks Secure File Transfer Protocol.

Table 1b: Filings that Comprise the Supplemental AFC Without Assigned TN #	
Submission Date	Document Title/ File Description
3/1/2024	CONFIDENTIAL_Appendix 1B Property Owner's Addresses and Map
3/1/2024	CONFIDENTIAL_Appendix 1D Site-Related Property Owners and Relationship to Project Owner
3/1/2024	Appendix 5-8A Paleo Records Search Results – CONFIDENTIAL
3/1/2024	CONFIDENTIAL_Appendix_Willow Rock Energy Storage Center Heat and Mass Balance Diagram
3/1/2024	CONFIDENTIAL_CNDDDB Forms
3/1/2024	CONFIDENTIAL_Swainson Hawk
3/1/2024	CONFIDENTIAL_Crotch BB
3/1/2024	CONFIDENTIAL_Focused Plant Survey Report
3/1/2024	CONFIDENTIAL_C05_F5_2_4a_C_CNDDDBPlants
3/1/2024	CONFIDENTIAL_C06_F5_2_4b_C_CNDDDBWildlife

⁷ The Supplemental AFC contains a new alternatives analysis, however, portions of the original alternatives analysis are referenced.



Table 1b: Filings that Comprise the Supplemental AFC Without Assigned TN #	
Submission Date	Document Title/ File Description
3/1/2024	CONFIDENTIAL_C08_F5_2_6a_C_ObservedSSPlants
3/1/2024	CONFIDENTIAL_C09_F5_2_6b_C_ObservedSSWildlife
3/1/2024	Biological Resources Shapefiles
3/1/2024, 3/6/2024	Noise Modeling Files
3/5/2024	Air Quality Modeling Files
3/7/2024	CONFIDENTIAL Cultural Resources Assessment of Willow Rock Energy Storage Center Advanced Compressed Air Energy System (A-CAES) Project
3/7/2024	CONFIDENTIAL Appendix A: Records Search Results
3/7/2024	CONFIDENTIAL Appendix B: Native American Consultation
3/7/2024	CONFIDENTIAL Appendix C: Survey Results Figures
3/7/2024	CONFIDENTIAL Appendix D: DPR 523-Series Forms
3/7/2024	CONFIDENTIAL Appendix E: Previous Studies

Table 1a lists several documents that were filed before the Committee Order that are part of the Supplemental AFC. None of these pre-existing documents have been amended for the Supplemental AFC.

Table 2 provides a list of filings that the Applicant believes are largely superseded by the Supplemental AFC; however, it is possible that the prior filings may contain information that is relevant to the Supplemental AFC. The Applicant reserves the right to utilize such prior information. If such circumstances arise, the Applicant will refile the appropriate information as a new filing in this proceeding.

Table 2: Superseded Filings		
TN #	Docketed Date	Document Title/ Description
240751-1 through 240751-22	12/1/2021	AFC Volume 1 Sections, with the exception of the Alternatives Section
240768-1 through 240768-15	12/1/2021	AFC Volume 2 Appendices
240770	12/2/2021	Section 2_Project Description_Gem Energy Storage Center
240771	12/2/2021	Appendix 5_3A and 5_3C Cultural Resources
240780	12/2/2021	Appendix 5_3B_Non-confidential CR Technical Report_Gem Energy Storage Center
240788	12/3/2021	Section 5_2_Biological_Resources_Gem Energy Storage Center
241008 through 241032	12/3/2021	Confidential cultural resources technical report and appendices
242775, 242776, 242778 through	4/5/2022	Hydrostor Gem Data Adequacy Supplement and Attachments



Table 2: Superseded Filings		
TN #	Docketed Date	Document Title/ Description
242794, 242796		
243018 243019	5/11/2022	Gem_Data Adequacy Master Response No 2 and Attachment
243639 through 243671	6/3/2022	Confidential cultural resources documents for Gem_Data Adequacy Master Response No 2 and Attachment
243731	6/27/2022	Data Adequacy Response 3_Cultural Resources_Gem Energy Storage Center
243863	6/28/2022	Confidential Cultural Resources Assessment Report for Gem Energy Storage Center Project
243971	4/25/2022	Confidential AFC Data Adequacy Supplement No 1 Attachment DA52-1 Biological Technical Report
243972	4/25/2022	Confidential Attachment DA52-3 Burrows
243973	5/19/2022	Data Adequacy Biological Resources Supplement Observed Suitable Burrows
245698	8/25/2022	Willow Rock Energy Storage Center Data Request Response Set 1
246210	9/26/2022	Willow Rock Energy Storage Center Data Request Response Set 1B
246219	9/27/2022	Attachment DR109-1 Data Response Set 1B
246604	10/17/2022	Attachment DR68-1 Willow Rock Energy Storage Center (21-AFC-02) Monthly Geotechnical Update – September 2022
247416	8/25/2022	Confidential Attachment DR9-1 Slip Sheet_Biological Resources_GIS Data
247417	8/25/2022	Confidential Attachment DR31-1_Desert Tortoise_2021
247418	8/25/2022	Confidential Attachment DR36-1_Burrow and Den Characteristics
247494	11/16/2022	Willow Rock Energy Storage Center Data Request Response 1 Workshop Responses
247529 through 247533	8/25/2022	Confidential Air Quality Spreadsheets
247661	11/22/2022	20221027_WRESC_Data Request_Responses Set 2 Final PDF_and Attachments
247906	12/2/2022	Revised Architectural History Survey Report
248213	12/22/2022	Attachment DR68-3 Willow Rock (21-AFC-02) Monthly Geotechnical Update 3 - November 2022
248273 through 248278, 248280	11/16/2022	Confidential biological resources filings
248496	1/23/2023	Willow Rock Energy Storage Center Responses to California Unions for Reliable Energy (CURE) Data Request Response Set 1
248497	1/23/2023	Willow Rock Energy Storage Center (21-AFC-02) Data Request Response Set 3



Table 2: Superseded Filings		
TN #	Docketed Date	Document Title/ Description
248518	1/25/2023	Attachment DR68-4 Willow Rock (21-AFC-02) Monthly Geotechnical Update 4 - December 2022
248856	2/17/2023	DR68-5 Monthly Geotechnical Update 5 - January 2023
248930 through 248934	2/23/2023	Mohave Ground Squirrel habitat assessment and attachments
249444	3/27/2023	Monthly Geotechnical Update 6
249495	3/29/2023	Willow Rock Energy Storage Center Data Request Set 4 Responses
249982	5/3/2023	Willow Rock AFC DR68-7 Monthly Geotechnical Update
250418	5/31/2023	CURE Data Request - Response Set 2
250724	6/23/2023	Willow Rock Monthly Geotechnical Update – April 2023

With this submission, the Applicant believes that all requirements of the Committee Order and subsequent clarification have been completed and that the 30-day clock for CEC Staff’s review should begin.

The Applicant will continue working with all interested stakeholders to move this important long duration energy storage forward.

As an officer of the Applicant, I hereby attest under penalty of perjury under the laws of the State of California that the contents of the Supplemental AFC, including supporting information, are complete, truthful, and accurate to the best of my knowledge and belief. This attestation incorporates by reference the Data Adequacy Worksheets⁸ that were submitted with the prior cover letter, which demonstrate how the Applicant believes that the Supplemental AFC meets the information requirements detailed in Appendix B to Article 6 of Title 20 in the California Code of Regulations.

Sincerely,

GEM A-CAES LLC

Jon Norman
President

⁸ TN#: 254774.