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STATE OF CALIFORNIA

**State Energy Resources Conservation
and Development Commission**

In the Matter of:

**WILLOW ROCK ENERGY STORAGE
CENTER**

Docket No. 21-AFC-02

**CALIFORNIA UNIONS FOR RELIABLE ENERGY
STATUS REPORT NO. 1**

August 26, 2024

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California Unions for Reliable Energy (“CURE”) submits this Status Report No. 1¹ pursuant to the *Order Terminating the Suspension of the Willow Rock Energy Storage Center Proceeding 21-AFC-02* (“Order”) submitted to the docket on July 26, 2024.² The Committee ordered the parties to file and serve a Status Report on or before the 26th of each month.³ The Status Report must inform the Committee about whether the case is progressing satisfactorily and identify potential delays and other relevant matters for the Committee.⁴

I. Progress of the Proceeding

Discovery is ongoing and CURE is working with the assistance of technical experts in air quality, public health, greenhouse gas (“GHG”) emissions, biology, hazards, geology, noise, and hydrology. CURE is reviewing the Supplemental Application for Certification (“SAFC”) materials, as well as California Energy Commission Staff’s data requests and responses by GEM A-CAES, LLC (“Applicant”). CURE submitted its first set of data requests to the Applicant on August 22, 2024.⁵ The requests pertain to project description, biological resources, geology, hydrology, hazards and hazardous materials, and GHG emissions.⁶

¹ While CURE submitted several Status Reports under the Committee’s initial Scheduling Order (TN 245754), this is the first Status Report submitted pursuant to the July 26, 2024 Order (TN 258022).

² TN 258022.

³ *Ibid.*

⁴ *Ibid.*

⁵ TN 258660.

⁶ *Ibid.*

CURE submitted its Issues Identification Statement and Proposed Schedule pursuant to the Committee’s Order on August 9, 2024.⁷ The Applicant subsequently filed a Motion for Committee Scheduling Conference on August 12, 2024.⁸ CURE will submit a response to Applicant’s motion on August 26, 2024.

II. Potential Delays and Other Relevant Matters

At this time, CURE is not aware of any potential delays or other relevant matters to bring to the Committee’s attention.

Dated: August 26, 2024

Respectfully submitted,

/s/ Tara C. Rengifo

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⁷ TN 258444.

⁸ TN 258454.