

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	259315
<b>Document Title:</b>	Willow Rock Energy Storage Center Supplemental Application for Certification Status Report No 2
<b>Description:</b>	N/A
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<b>Submitter Role:</b>	Applicant Representative
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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  
SUPPLEMENTAL APPLICATION FOR CERTIFICATION  
STATUS REPORT NO. 2**

Pursuant to the *Revised Committee Scheduling Order* issued on September 9, 2024,<sup>1</sup> GEM A-CAES LLC (the “Applicant”) submits this Supplemental Application for Certification Status Report No. 2 to inform the Committee of the progress of the Application for Certification proceeding for the Willow Rock Energy Storage Center (the “WRESC”).

**ACTIONS TAKEN TO ADVANCE THE WILLOW ROCK ENERGY STORAGE  
CENTER SINCE THE LAST STATUS REPORT**

On September 19, 2024, the Applicant filed its responses to California Energy Commission (“CEC”) Staff’s Data Requests Set 2.<sup>2</sup> On September 23, 2024, CEC Staff issued Data Requests Set 3.<sup>3</sup> The Applicant is reviewing the data requests and will respond within the timeframe provided for in Section 1716 of the CEC’s regulations.

On September 23, 2024, the Applicant also contacted Intervenor California Unions for Reliable Energy (“CURE”) seeking an extension to provide responses to CURE’s Data Requests Set 1. The parties agreed to an extension of the timeframes set forth in Section 1716 of the CEC’s regulations. The Applicant will be submitting responses to CURE’s Data Requests Set 1 on or before September 27, 2024. The Applicant is also reviewing the comments submitted by the California Department of Fish and Wildlife (“CDFW”).<sup>4</sup> The Applicant anticipates these comments will be incorporated into the forthcoming CEC Data Requests Set 4.

At the request of the Hearing Office, the Applicant has also been coordinating on logistics for the Site Visit and Informational Hearing that the Applicant understands will be scheduled for the Rosamond Community Services District boardroom on November 6, 2024.

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<sup>1</sup> TN #: 259084.

<sup>2</sup> TN #: 259220.

<sup>3</sup> TN #: 259256.

<sup>4</sup> TN #: 259159

The Committee granted the Petition to Intervene filed by the Center for Biological Diversity (“CBD”).<sup>5</sup> The Applicant and CBD have been in communications about providing CBD and its agents access to certain materials filed consistent with the CEC’s regulations related to confidential designation.

In addition to the items identified above, the Applicant continues to engage stakeholders including Congressman Vince Fong’s office and Kern County Planning and Natural Resources Department as well as community stakeholders such as the Rosamond Chamber of Commerce, Kern Economic Development Corporation, Tehachapi Economic Development Corporation, Mojave Chamber of Commerce, California City Chamber of Commerce, Bakersfield Chamber of Commerce, Rosamond Armed Forces Parade group, Antelope Valley College Foundation, Southern Kern Unified School District, Kern Hispanic Chamber, Black Chamber of Commerce, Antelope Valley Economic Development & Growth Enterprise, Asian Chamber of Commerce, Adventist Health, and Safe Haven Kids League, among other groups that stand to benefit from the WRESC project.

The Applicant also has the following updates to report:

- The Applicant has exchanged information with CEC Staff and Lahontan Regional Water Quality Control Board in two collaborative sessions to walk through the Advanced Compressed Air Energy Storage (“A-CAES”) technology and engineering, closed-loop systems for process water, jurisdictional delineation, stormwater management, and other related items in anticipation of responding to CEC Data Requests Set 3.
- The Applicant has continued to collaborate with CEC Staff and the interested tribal entities to advance the Cultural Resources Phase II Testing Plan including field work with tribal monitors in the coming weeks.
- The Applicant is meeting with CEC Staff, CDFW, CBD, and CURE to exchange information on compliance with the Western Joshua Tree Conservation Act in early October.
- The Applicant is scheduling an information exchange with CEC Staff engineering subject matter experts regarding A-CAES technology and design in early October.
- The Applicant has met with the California Division of Safety of Dams regarding non-jurisdiction of the compensating surface water reservoir and anticipates updating the CEC upon receipt of more information.

The Applicant has secured site control over 100% of the facility location and more than 90% of the areas planned for the optional architectural berm and/or temporary construction and laydown areas, which is enough acreage to construct and operate the facility.

- The Applicant continues to work with Kern County on confirming the Transmission Line siting within County Right-of-Way and the associated Franchise Agreement.

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<sup>5</sup> TN #: 258781.

- The Applicant continues to work with Southern California Edison on implementing the existing contracted Load Generating Interconnection Agreement at Whirlwind Substation.
- The Applicant continues work to meet its commitments under its existing contracted commercial agreement with Central Coast Community Energy.

In closing, the Applicant appreciates and agrees with the Committee’s Order finding that “...simultaneous [status] reports satisfactorily provides the Committee with the information it needs to independently assess the status of the proceeding from each party’s perspective.”<sup>6</sup>

Finally, the Applicant reiterates: the WRESC project is key to meeting California’s climate goals while maintaining reliability of the grid; the Applicant is committed to ensuring the construction and operation of the project brings benefits to Kern County; and that the Applicant is working closely with the CEC, Kern County Board of Supervisors, the Governor’s Office, and the local community to get construction started in 2025.

Dated: September 26, 2024

Respectfully Submitted,

ELLISON SCHNEIDER HARRIS & DONLAN LLP

By  \_\_\_\_\_

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<sup>6</sup> TN #: 259084 at p. 5.