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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. 2**

September 26, 2024

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California Unions for Reliable Energy (“CURE”) submits this Status Report pursuant to the *Revised Committee Scheduling Order* (“Order”) filed on September 9, 2024.¹ The Committee ordered the parties to file and serve a Status Report on or before the 26th of each month.² 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.³

I. Progress of the Proceeding

CURE reviewed GEM A-CAES, LLC’s (“Applicant”) responses to California Energy Commission (“CEC”) Staff’s Data Requests Set 1⁴ and Set 2⁵ as well as CEC Staff’s Data Requests Set 3.⁶ CURE submitted its first set of data requests to the Applicant on August 22, 2024.⁷ The requests pertain to project description, biological resources, geology, hydrology, hazards and hazardous materials, and greenhouse gas emissions.⁸ On September 11, 2024, Applicant submitted its *Notice Pursuant to 20 C.C.R. § 1716(f) Regarding CURE Data Requests Set 1*, which objects to requests 99-102.⁹

Applicant’s responses to CURE’s Data Requests Set 1 were due on Monday, September 23, 2024, but that day, counsel for Applicant contacted counsel for CURE to request an extension of time to Friday, September 27,

¹ TN 259084.

² *Ibid.*

³ *Ibid.*

⁴ TN 258681.

⁵ TN 259220.

⁶ TN 259256.

⁷ TN 258660.

⁸ *Ibid.*

⁹ TN 259126.

2024.¹⁰ Counsel for CURE and counsel for Applicant agreed to extend the deadline for Applicant's responses to Friday, September 27, 2024.¹¹ This agreement also extended CURE's deadline to petition the committee for an order to provide information pursuant to section 1716(g) to Monday, October 28, 2024.¹²

CURE will review Applicant's responses to its Data Requests Set 1, once docketed, and is actively preparing Data Requests Set 2 with the assistance of its technical experts.

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: September 26, 2024

Respectfully submitted,

/s/ Tara C. Rengifo

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¹⁰ Phone call between Tara Rengifo, counsel for CURE, and Samantha Neumyer, counsel for Applicant (September 23, 2024); *see also* 20 C.C.R. §§ 1003, 1716(f).

¹¹ *Id.* at § 1716(f).

¹² *Id.* at § 1716(g).