

DOCKETED

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Project Title:	Willow Rock Energy Storage Center
TN #:	259339
Document Title:	Willow Rock Energy Storage Center Repeated Application for Confidential Designation of Biological Resources Information
Description:	N/A
Filer:	Amanda Cooley
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant Representative
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September 27, 2024

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 Biological 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 documents responsive to the Biological Resources Data Requests of California Unions for Reliable Energy (“CURE”). Specifically, these documents are provided as part of the Applicant’s Response to *CURE Data Requests Set 1 for Willow Rock Energy Storage Center*¹ in the Supplemental Application for Certification for the Willow Rock Energy Storage Center:

- Attachment DR26-1 – Utility Pole Locations Map Book
- Attachment DR33-1 – Survey Area and Drainages Map Book
- Attachment DR74-1 – 2023 and 2024 Swainson’s Hawk Survey Nest Locations Map Book
- Attachment DR75-1 – 2023 and 2024 Swainson’s Hawk Survey Hawk Locations Map Book

By letter dated June 1, 2022, 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 information relating to biological resources for the Willow Rock Energy Storage Center.² The Applicant also requested confidential designation for information relating to biological resources via a repeated application for confidential designation on March 4, 2024.³ This request was granted by the Executive Director by letter dated May 21, 2024.⁴ The biological resources information listed above contain information that is substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

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

¹ TN#: 258660.

² TN#: 243369.

³ TN#: 254789.

⁴ TN#: 256496.

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. Thank you.

Dated: September 27, 2024

ELLISON SCHNEIDER HARRIS & DONLAN LLP

By: /s/ _____

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