

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	259534
<b>Document Title:</b>	Applicant's Notice Pursuant to 20 CCR § 1716(f) for CEC Staff's Data Requests Set 3
<b>Description:</b>	N/A
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<b>Organization:</b>	Ellison Schneider Harris & Donlan LLP
<b>Submitter Role:</b>	Applicant Representative
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<b>Docketed Date:</b>	10/14/2024

**STATE OF CALIFORNIA**

**Energy Resources Conservation  
and Development Commission**

In the Matter of: )  
 )  
Application for Certification for the )  
Willow Rock Energy Storage Center )  
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Docket No. 21-AFC-02

**APPLICANT’S NOTICE PURSUANT TO 20 C.C.R. § 1716(f)  
FOR CEC STAFF’S DATA REQUESTS SET 3**

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**APPLICANT’S NOTICE PURSUANT TO 20 C.C.R. § 1716(f)  
REGARDING STAFF’S DATA REQUESTS SET 3**


Pursuant to Section 1716(f) of the California Energy Commission’s (“CEC”) regulations, GEM A-CAES LLC hereby provides this notice of objection to CEC Staff’s Data Requests Set 3, Data Request 66, which was issued on September 23, 2024. Data Request 66 requests “a detailed Whirlwind Substation one-line diagram,” in addition to “equipment ratings, including bay arrangement of the breakers, disconnect switches, buses, and other equipment that would be required for interconnection of the project.” As stated in *Data Adequacy Supplemental No. 1*, Southern California Edison previously indicated that the one-line diagram of the Whirlwind Substation is confidential Critical Energy Infrastructure Information and declined to provide the Applicant with the information.<sup>1</sup> Therefore, the Applicant objects to Data Request 66 as requesting information that is not reasonably available to the Applicant.

Without waiving this objection, the Applicant reserves the right to provide, to the extent the information is reasonably available, a response in part to Data Request 66.

Dated: October 14, 2024

Respectfully submitted,

ELLISON SCHNEIDER HARRIS & DONLAN LLP

By  \_\_\_\_\_

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<sup>1</sup> TN#: 242776, p. 4.