

**DOCKETED**

<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	259672
<b>Document Title:</b>	CURE Issues ID Report
<b>Description:</b>	N/A
<b>Filer:</b>	Alisha Pember
<b>Organization:</b>	California Unions for Reliable Energy
<b>Submitter Role:</b>	Intervenor
<b>Submission Date:</b>	10/23/2024 3:58:20 PM
<b>Docketed Date:</b>	10/23/2024

**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'S  
ISSUES IDENTIFICATION REPORT**

October 23, 2024

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## INTRODUCTION

California Unions for Reliable Energy (“CURE”) submits this Issues Identification Report pursuant to the Committee’s *Notice of Site Visit and Informational Hearing, and Committee Order* (“Order”) dated October 2, 2024.<sup>1</sup> In its Order, the Committee directed the California Energy Commission (“CEC”) Staff, CURE, and Center for Biological Diversity to each file a separate concise Issues Identification Report summarizing the major issues that each party believes are presented in the Supplemental Application for Certification (“SAFC”) for the reconfigured and relocated Willow Rock Energy Storage Center Project (“WRESC” or “Project”).<sup>2</sup>

## DISCUSSION

CURE is actively engaged in the discovery phase of this proceeding along with the assistance of its technical experts in air quality, greenhouse gas (“GHG”) emissions, public health, hazards, biology, noise, geology, and water and hydrology. CURE’s experts have identified several issues that warrant further evaluation and additional information from GEM A-CAES LLC (“Applicant”).

First, CURE’s air quality expert is evaluating the SAFC’s air quality and GHG emissions modeling analysis and calculations, particularly during the Project’s construction phase. The Applicant also performed a refined 1-hour NO<sub>2</sub> modeling for the construction phase for both the berm and no-berm

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<sup>1</sup> TN 259528.

<sup>2</sup> *Ibid.*

options in its response to CEC Staff's data request.<sup>3</sup> CURE's expert is reviewing this modeling. CURE's expert is also assessing whether the Project's emissions will exceed the relevant standards as well as additional mitigation measures to reduce the air quality impacts to less than significant levels.

Second, CURE's public health expert is analyzing the risks from exposure to contaminated soils impacted by spores of Valley Fever and impacts on worker health from the potential presence of underground gases during cavern construction.

Third, CURE's biologist is evaluating gaps in the baseline data for biological resources that may skew the impacts analysis and identification of mitigation measures. CURE's biologist also participated in meetings with the parties and California Department of Fish and Wildlife ("CDFW") concerning the Applicant's proposed Western Joshua Tree Relocation Plan.<sup>4</sup> CURE's expert will evaluate the adequacy of the draft plan, once released. CURE's expert biologist has also identified potential issues related to avian collision and electrocution hazards, noise, night lighting, and construction of access roads and improvements to existing roads for the Project's generation tie-line ("gen-tie line").

Fourth, CURE's noise consultant is evaluating issues related to potentially significant noise levels during nighttime construction activities.

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<sup>3</sup> TN 259220.

<sup>4</sup> TN 259315.

Finally, CURE's expert in hydrogeology reviewed the packer testing data for the Project provided in response to CURE's data requests and identified several issues related to the adequacy of that testing that will be further examined in subsequent data requests.<sup>5</sup> In response to CURE's data requests, the Applicant also provided a summary of the framework for the Project's hydrogeological study to assess the cavern's water and gas containment properties, i.e., the leakage analysis.<sup>6</sup> CURE's expert is assessing potential issues with certain assumptions that support the Project's leakage analysis.

Discovery is ongoing and CURE continues to analyze existing and new information, data, and analysis related to the Project's land use, environmental, and public health impacts. Additional issues may arise as the proceeding continues and new information is provided during the discovery phase. CURE reserves the right to comment on any additional issues that may arise in these and other resource areas later in the proceeding.

Dated: October 23, 2024

Respectfully submitted,

/s/ Tara C. Rengifo

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<sup>5</sup> TN 259338.

<sup>6</sup> *Ibid.*

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