

DOCKETED	
Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	260308
Document Title:	Center for Biological Diversity Status Report No 3
Description:	N/A
Filer:	Zeynep J. Graves
Organization:	Center for Biological Diversity
Submitter Role:	Intervenor Representative
Submission Date:	11/26/2024 2:16:54 PM
Docketed Date:	11/26/2024

STATE OF CALIFORNIA

State Energy Resources Conservation and
Development Commission

In the Matter of:

WILLOW ROCK ENERGY
STORAGE CENTER

Docket No. 21-AFC-02

INTERVENOR CENTER FOR BIOLOGICAL DIVERSITY
STATUS REPORT NO. 3

Zeynep J. Graves
Lisa T. Belenky
Center for Biological Diversity
1212 Broadway, Suite 800
Oakland, CA 94612
510.844.7160
zgraves@biologicaldiversity.org
lbelenky@biologicaldiversity.org

Attorneys for Intervenor,
Center for Biological Diversity

**INTERVENOR CENTER FOR BIOLOGICAL DIVERSITY
STATUS REPORT NO. 3**

Pursuant to the California Energy Commission’s (“CEC”) Order Terminating the Suspension of the Willow Rock Energy Storage Center Proceeding 21-AFC-02 (TN 258022) and the Revised Committee Scheduling Order (TN 259084), the Intervenor Center for Biological Diversity (the “Center”) submits this Status Report.

I. Progress of the Proceeding

On November 6, 2024, the Center participated in the informational hearing on the Supplemental AFC and attended the site visit to the proposed project location.

On November 8, 2024, in response to a request from the Center, the Applicant provided the Center with certain confidential documents pertaining to biological resources, jurisdictional drainage, and utility pole locations, which the Center has since reviewed.

On November 19, 2024, biologists Jamison Miner and Chris Huntley, along with California Regional Water Quality Control Board representative Tiffany Steinert, Intervenor CURE, and the Center, met with the Applicant for an information exchange session focusing primarily on jurisdictional drainages.

On November 25, 2024, the Center’s attorney, Zeynep Graves, met and conferred with the Applicant’s attorney, Jeffery Harris, to discuss the Applicant’s proposed revisions to the Scheduling Order. Based on the information provided to date, the Center declined to stipulate to the milestones in the Applicant’s Proposed Schedule at this time. However, the Center remains open to further discussions with all parties to explore whether a resolution can be reached.

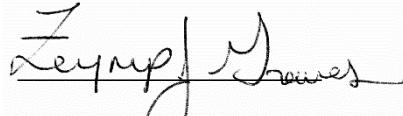
On November 26, 2024, the Center submitted its first set of data requests to the Applicant. The requests pertain to biological and water resources.

The Center's review of the Supplemental AFC and other docketed discovery materials remains ongoing. As this review progresses, additional issues may arise regarding biocultural resources, water resources, cultural resources, and other areas. If further data is needed, the Center will submit appropriate data requests before the close of discovery on January 13, 2025.

II. Potential Delays and Other Relevant Matters

The Center does not anticipate any potential delays at this time. Additionally, the Center is also not currently aware of any other relevant matters that require the Committee's attention.

November 26, 2024



Zeynep J. Graves
Lisa T. Belenky
Center for Biological Diversity
1212 Broadway, Suite 800
Oakland, CA 94612
T: 510.844.7160
zgraves@biologicaldiversity.org
lbelenky@biologicaldiversity.org

Attorneys for Intervenor,
Center for Biological Diversity