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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. 4**

November 26, 2024

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Attorneys for California Unions for
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California Unions for Reliable Energy (“CURE”) submits this Status Report pursuant to the *Revised Committee Scheduling Order* (“Revised Scheduling 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

On November 6, 2024, CURE attended the Project’s site visit and presented its interests in the Supplemental Application for Certification (“SAFC”) and the issues identified in CURE’s Issues Identification Report⁴ at the informational hearing.⁵ The following day, CURE and its expert biologist participated in a site visit hosted by Gem A-CAES LLC (“Applicant”) that focused on biological resources. CURE also remotely attended a meeting on November 19, 2024 that involved an exchange between California Energy Commission (“CEC”) staff and representatives for the Applicant about data gaps related to biological resources and water resources. It is CURE’s understanding that another site visit concerning biological resources and water resources may be scheduled for November 27, 2024.

¹ TN 259084.

² *Ibid.*

³ *Ibid.*

⁴ TN 259671.

⁵ CURE’s presentation satisfied the requirements set forth by the Committee in its *Notice of Site Visit and Informational Hearing, and Committee Order* dated October 2, 2024. TN 259528.

CURE reviewed the Applicant's September 27, 2024 responses to CURE's Data Requests Set 1 and has been engaged in meet and confer efforts with the Applicant regarding its responses to Data Request Nos. 18 and 104.⁶ CURE has had several communications with the Applicant about these responses but has not received a substantive response. CURE is potentially preparing a second set of data requests with the assistance of its technical experts. CURE has also submitted Public Records Act requests and Freedom of Information Act requests to state and federal agencies regarding the Project.

Counsel for CURE participated in a meet and confer with Applicant's counsel on November 26, 2024 regarding the Applicant's responses to Data Request Nos. 18 and 104, and its proposed modifications to the Revised Scheduling Order.

II. Potential Delays and Other Relevant Matters

CURE is not aware of any potential delays or other relevant matters to bring to the Committee's attention.

Dated: November 26, 2024

Respectfully submitted,

/s/ Tara C. Rengifo

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⁶ TN 259338.

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