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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'S
STATUS REPORT NO. 5**

December 26, 2024

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California Unions for Reliable Energy (“CURE”) submits this Status Report pursuant to the *Order Granting In Part and Denying In Part Applicant’s Motion to Amend Revised Scheduling Order* (“Second Revised Scheduling Order”) filed on December 11, 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 December 10, 2024, CURE docketed its response to GEM A-CAES LLC’s (“Applicant”) *Motion to Amend the Revised Scheduling Order for the Willow Rock Energy Storage Center*⁴ proceeding.⁵ CURE has reviewed the Committee’s Second Revised Scheduling Order and appreciates the Committee’s inclusion of important opportunities for participation for the remaining phases of the proceeding.

Prior to the close of discovery on January 13, 2025, CURE may submit a second set of data requests with the assistance of its technical experts. CURE continues to review records received in response to its Public Records Act requests and Freedom of Information Act requests from state and federal agencies regarding the Project.

¹ TN 260601.

² *Ibid.*

³ *Ibid.*

⁴ TN 260431.

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: December 26, 2024

Respectfully submitted,

/s/ Tara C. Rengifo

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⁵ TN 260582.