

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	261279
<b>Document Title:</b>	Willow Rock Energy Storage - CURE Status Report 6
<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>	1/24/2025 2:21:26 PM
<b>Docketed Date:</b>	1/24/2025

**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. 6**

January 24, 2025

Richard M. Franco  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, CA 94080  
(650) 589-1660 Voice  
(650) 589-5062 Facsimile  
[rfranco@adamsbroadwell.com](mailto:rfranco@adamsbroadwell.com)

Attorneys for California Unions for  
Reliable Energy

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.<sup>1</sup> The Committee ordered the parties to file and serve a Status Report on or before the 26th of each month.<sup>2</sup> 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.<sup>3</sup>

## **I. Progress of the Proceeding**

Prior to the close of discovery, CURE submitted a second set of data requests with the assistance of its technical experts related to air quality, electric transmission, geologic hazards, biological resources, water resources, noise, and alternatives. Pursuant to the Second Revised Scheduling Order, GEM A-CAES LLC (“Applicant”) must respond on or before January 27, 2025.<sup>4</sup> 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.

## **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.

---

<sup>1</sup> TN 260601.

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

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.*

Dated: January 24, 2025

Respectfully submitted,

/s/ Richard Franco

---

Richard Franco  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, CA 94080  
(650) 589-1660 Voice  
(650) 589-5062 Facsimile  
[rfranco@adamsbroadwell.com](mailto:rfranco@adamsbroadwell.com)

Attorneys for California Unions for  
Reliable Energy