

DOCKETED	
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Project Title:	Willow Rock Energy Storage Center
TN #:	261389
Document Title:	Willow Rock Energy Storage Center Repeated Application for Confidential Designation of Biological Resources Information
Description:	N/A
Filer:	Amanda Cooley
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant Representative
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January 28, 2025

Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Willow Rock Energy Storage Center (21-AFC-02): Repeated Application for Confidential Designation of Biological Resources Information

Dear Mr. Bohan:

Pursuant to Title 20, section 2505(a)(4), of the California Code of Regulations, GEM A-CAES LLC (the “Applicant”) hereby submits this Repeated Application for Confidential Designation for the following document, provided as part of the Applicant’s Response to the California Energy Commission’s (“CEC”) *Data Requests Set 6 for Willow Rock Energy Storage Center*¹ in the Supplemental Application for Certification for the Willow Rock Energy Storage Center:

- Attachment 126-1 – Confidential Mapbook Figure 4

By letter dated June 1, 2022, pursuant to Title 20, section 2505(a)(3)(A), of the California Code of Regulations, the Executive Director approved the initial request for confidential designation of certain information relating to biological resources for the Willow Rock Energy Storage Center.² The Applicant requested confidential designation for information relating to biological resources via a repeated application for confidential designation on March 4, 2024.³ This request was granted by the Executive Director by letter dated May 21, 2024.⁴ The Applicant again requested confidential designation for biological resources information via repeated applications for confidential designation on September 27, 2024,⁵ for which the Executive Director granted confidentiality by letter dated October 9, 2024,⁶ and on October 28, 2024,⁷ for which the Executive Director granted confidentiality by letter dated November 22, 2024.⁸ The biological resources information listed above contains information that is substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged. The Applicant is submitting this repeated application out

¹ TN#: 261072.

² TN#: 243369.

³ TN#: 254789.

⁴ TN#: 256496.

⁵ TN#: 259339.

⁶ TN#: 259494.

⁷ TN#: 259737.

⁸ TN#: 260232.

of an abundance of caution should CEC Staff determine that this information should be maintained as confidential.

I certify under penalty of perjury of the laws of the State of California the information described above is substantially similar to the previously submitted information and that all the facts and circumstances relevant to confidentiality remain unchanged. I am authorized to make this repeated application and certification on behalf of the Applicant, GEM A-CAES LLC, a Limited Liability Company.

Please contact us at (916) 447-2166 should you have any questions. Thank you.

Dated: January 28, 2025

ELLISON SCHNEIDER HARRIS & DONLAN LLP

By: /s/

Samantha G. Neumyer

Attorneys for the Applicant