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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. 7

February 26, 2025

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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. The Committee ordered the
parties to file and serve a Status Report on or before the 26th of each month. 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

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. GEM A-CAES LLC ("Applicant") responded to these data requests on January 27, 2025. CURE continues to review Applicant's responses, the documents produced in connection with those responses, Applicant's responses to CEC staff's data requests, and records received in response to CURE's Public Records Act requests and Freedom of Information Act requests from state and federal agencies.

¹ TN 260601.

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² Ibid.

³ *Ibid*.

⁴ TN 261315.

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: February 26, 2025 Respectfully submitted,

/s/ Richard Franco

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