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<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	261996
<b>Document Title:</b>	WRESC Status Report No 7
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**STATE OF CALIFORNIA  
Energy Resources Conservation  
and Development Commission**

In the Matter of:	)	
	)	
Application for Certification for the	)	Docket No. 21-AFC-02
Willow Rock Energy Storage Center	)	
	)	

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**WILLOW ROCK ENERGY STORAGE CENTER  
SUPPLEMENTAL APPLICATION FOR CERTIFICATION  
STATUS REPORT NO. 7**

Pursuant to the *Order Granting In Part and Denying In Part Applicant’s Motion to Amend Revised Scheduling Order* issued on December 11, 2024,<sup>1</sup> as revised,<sup>2</sup> GEM A-CAES LLC (the “Applicant”) submits this Supplemental Application for Certification Status Report No. 7 to inform the Committee of the progress of the Application for Certification proceeding for the Willow Rock Energy Storage Center (the “WRESC”).

**THE COMMITTEE SHOULD HOLD TO ITS OWN ORDER  
REQUIRING THE PUBLICATION OF THE “PRELIMINARY”  
STAFF ASSESSMENT ON MARCH 13, 2025**

On a call on February 26, 2025, the California Energy Commission (“CEC”) Staff indicated to the Applicant that the Staff intends to recommend an eight-week (i.e., two-month) delay in the date for the Preliminary Staff Assessment (“PSA”) that this Committee has ordered to be published on March 13, 2025.<sup>3</sup>

In addition to being in direct contravention of the Committee’s issued Order, a two-month delay in these proceedings potentially frustrates California’s efforts to secure its fair share of fleeting federal incentives while substantially impeding the advancement of California renewable energy, reliability and climate policies.

The Staff declared the WRESC Data Complete on July 16, 2024, indicating the Staff had all of the information it needed to proceed with the Supplemental Application for Certification (“SAFC”).<sup>4</sup> Final Data Requests were issued on January 13, 2025, and the Applicant’s responses filed, as documented below. Today, Staff says they have certain additional informational needs that must be met. Data Completeness and close of Discovery taken together logically dictate that there should be no delays for new, additional information.

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<sup>1</sup> TN #: 260601.

<sup>2</sup> TN #: 260752.

<sup>3</sup> *Id.*, p. 6.

<sup>4</sup> TN #: 257763.

The Applicant continues producing the information requested in late 2024 and early 2025 by CEC Staff. Accordingly, equity dictates that the Applicant should not suffer scheduling delays due to these latest data requests.

To be sure, information provided between the PSA and the Final Staff Assessment will have no detrimental impact to public review and comment. The PSA is followed by multiple opportunities for public comment and participation, including, but not limited to: Public comments on the PSA; workshops on the PSA; a “Final” Staff Assessment; Testimony filed; Evidentiary Hearings; Briefings; a Proposed Decision; Public Comments; and a Final Decision. Given the preliminary nature of the PSA and all of the public process ahead, there is simply no need to delay the PSA, especially after finding of Data Completeness and the closing of Discovery.

The Commission’s own Regulations expressly contemplate the PSA is not the final word. Proceeding with a PSA on these facts is not a failure of the CEC process; *it is the CEC process*. As the name indicates, this is the “Preliminary” Staff Assessment. The Committee should recognize the substantial prejudice to the Applicant and the lack of detriment to the public process and require the publication of the “Preliminary” Staff Assessment on March 13, 2025

#### **ACTIONS TAKEN TO ADVANCE THE WILLOW ROCK ENERGY STORAGE CENTER SINCE THE LAST STATUS REPORT**

The following filings have been made since Status Report Number 6. On January 27, 2025, the Applicant filed Willow Rock Data Request 6 Response, related to Water Resources and Biological Resources.<sup>5</sup> On that same day, the Applicant filed Willow Rock California Unions for Reliable Energy (“CURE”) Data Request 2 Response, related to Alternatives, Air Quality, Electric Transmission and Reliability, Biological Resources, Geological Hazards and Resources, Water Resources, and Noise.<sup>6</sup> On January 28, 2025, the Applicant filed the Willow Rock Energy Storage Center Repeated Application for Confidential Designation of Biological Resources Information and the related materials.<sup>7</sup> On January 31, 2025, the Applicant filed a series of attachments responsive to the Parties’ last set of Data Requests.<sup>8</sup> On February 5, 2025, the Applicant filed redlined versions of SAFC Sections 1 and 2, as requested by Staff.<sup>9</sup> The Applicant appreciates the hard work and collaboration with CEC Staff and all Parties to the proceeding to advance this project through the permitting process.

The Applicant continued to meet with U.S. Representatives Vince Fong, David Valadao, George Whitesides, and other local, state, and federal stakeholders to discuss the project status and the U.S. Department of Energy Loan Programs Office announcement of the conditional commitment for a loan guarantee of up to \$1.76 billion for the WRESC.

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<sup>5</sup> TN #: 261314.

<sup>6</sup> TN #: 261315.

<sup>7</sup> TN #s: 261389 and 261844.

<sup>8</sup> TN #s: 261500, 261511, 261515, and 261516.

<sup>9</sup> TN #s: 261563 and 261564.

The Applicant is also pleased to share with stakeholders its Silver City Energy Storage Centre project in Broken Hill, Australia obtained approval of its Development Application from the New South Wales Department of Planning, Housing and Infrastructure. Construction of the 200 MW, 1,600 MWh Silver City project is set to start this year, providing vital long-duration energy storage (“LDES”) and replacing aging diesel generators. Once complete, it will form the backbone of a mini-grid, drawing on local renewable energy to power the town independently and protect against future blackouts.

The Applicant also has the following updates to report:

- Obtained approval from Kern County Board of Supervisors for Zone Change.
- Continued collaboration with CEC Staff and California Department of Fish and Wildlife on biological resources avoidance, minimization, and mitigation measures for Western Joshua Tree, Crotch’s Bumblebee, and Burrowing Owl.
- Continued collaboration with CEC Staff and Lahontan Regional Water Quality Control Board on potential Waste Discharge Requirements and jurisdictional features.
- Ongoing preparation of a Phase II Cultural Resources Report with the tribal entities’ and subject matter experts’ findings from subsurface field work completed in January, 2025.
- Collaboration with CEC Staff and the Department of Water Resources Division of Safety of Dams on potential jurisdiction of the hydrostatically compensating surface reservoir.
- Continued landowner engagement to finalize siting of the transmission line preferred pathway including collaboration with Southern California Edison, Los Angeles Department of Water and Power, California Department of Transportation, and Bureau of Land Management.
- Continued engagement with the California Public Utilities Commission on the Mid-Term Reliability and LDES procurement requirements decided as part of the Integrated Resource Planning proceeding.
- Engagement with U.S. Representative Vince Fong and Kern County stakeholders at the U.S. Chamber of Commerce and the Greater Bakersfield Chamber roundtable on tax reform.
- Continued charitable giving and community engagement including fundraising with local stakeholders for Los Angeles wildfire relief at “Concert for a Cause” hosted by the Rotary of Tehachapi and the Tehachapi Valley Recreation and Park District.

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## **CONCLUSION**

The Applicant looks forward to continued collaboration with the CEC and other Parties on the certification and initiation of construction of this important LDES project in 2025, which is key to meeting California's climate and energy goals while maintaining reliability of the grid.

Dated: February 26, 2025

Respectfully Submitted,

ELLISON SCHNEIDER HARRIS & DONLAN LLP

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