

DOCKETED	
Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	262220
Document Title:	Repeated Application for Confidential Designation Phase II Cultural Resources Testing and Evaluation Report
Description:	N/A
Filer:	Samantha G. Neumyer
Organization:	Climate Edge Law Group
Submitter Role:	Applicant Representative
Submission Date:	3/17/2025 4:56:39 PM
Docketed Date:	3/17/2025

March 17, 2025

Mr. 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 Cultural 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 cultural resources information, submitted in support of the Supplemental Application for Certification for the Willow Rock Energy Storage Center (“WRESC”):

- *Phase II Cultural Resources Testing and Evaluation for Willow Rock Energy Storage Center Project*

By letter dated December 13, 2021, 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 documents relating to cultural resources within the WRESC area, including confidential literature and archival research submitted by the Applicant.¹ By letters dated December 13, 2021, May 21, 2024, July 16, 2024, and December 13, 2024, pursuant to the same regulations, the Executive Director also approved subsequent repeated applications for confidential designation for cultural resources information pertaining to the WRESC.²

The document listed above contains cultural resources 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 seeks confidential designation for the cultural resources information described above on the same basis as the prior approval made by the Executive Director.

The Applicant notes that portions of the documents above may contain general or other information that can be made publicly available or provided in a redacted version. If needed, the

¹ TN#: 241005.

² TN#s: 241005, 256496, 257761, and 260663, respectively.

Applicant requests that California Energy Commission Staff work with the Applicant to prepare redacted versions of the documents identified above that can be made available for public disclosure.

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) 629-4141 should you have any questions or require additional information. Thank you.

Dated: March 17, 2025

CLIMATE EDGE LAW GROUP

/s/

Jeffery D. Harris
Samantha G. Neumyer
Attorneys for Applicant