

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
<b>TN #:</b>	262631
<b>Document Title:</b>	Center for Biological Diversity's Response to CEC Staff's Motion Seeking a New Scheduling Order
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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**

**INTERVENOR CENTER FOR BIOLOGICAL DIVERSITY'S  
RESPONSE TO CALIFORNIA ENERGY COMMISSION STAFF'S  
MOTION SEEKING A NEW SCHEDULING ORDER**

Zeynep J. Graves  
Lisa T. Belenky  
Center for Biological Diversity  
2100 Franklin St., Suite 375  
Oakland, CA 94612  
510.844.7160  
[zgraves@biologicaldiversity.org](mailto:zgraves@biologicaldiversity.org)  
[lbelenky@biologicaldiversity.org](mailto:lbelenky@biologicaldiversity.org)

Attorneys for Intervenor,  
Center for Biological Diversity

**INTERVENOR CENTER FOR BIOLOGICAL DIVERSITY'S  
RESPONSE TO CALIFORNIA ENERGY COMMISSION STAFF'S  
MOTION SEEKING A NEW SCHEDULING ORDER**

In accordance with the Committee's Third Revised Committee Scheduling Order (the "Revised Scheduling Order") (TN 262562) for the Willow Rock Energy Storage Center proceeding (21-AFC-02), the Center for Biological Diversity (the "Center") submits this response to the California Energy Commission ("CEC") Staff's Motion Seeking a New Scheduling Order (TN 262571).

As noted in the Center's March 26, 2025 Status Report (TN 262422 at 4)<sup>1</sup> and reflected in CEC Staff's Motion (TN 262571 at 6), the Center does not object to the requested revisions to the Committee's scheduling order. However, CEC Staff's Motion does not address the Committee's operative scheduling order issued on April 2, 2025—including the Committee's decision in the Revised Scheduling Order to shorten the public comment period from 45 to 30 days following the release of the Preliminary Staff Assessment. (*Compare* TN 262571 at 7 *with* TN 262562 at 8.)

The Center respectfully urges the Committee to reconsider that change as it assesses CEC Staff's Motion and to restore a 45-day public comment period to ensure adequate time for meaningful public participation. The Preliminary Staff Assessment includes a voluminous record with many detailed appendices, and the Committee has consistently indicated its intent to provide a 45-day comment period, as evidenced by repeated references throughout the docket.

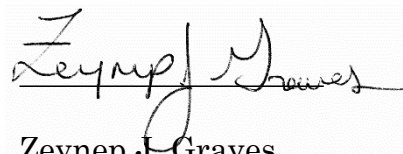
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<sup>1</sup> Pinpoint citations refer to the page numbers of the docketed PDF.

CEC Staff's filing of the *Partial* Preliminary Staff Assessment on March 13, 2025 (TN 262184)—which was incomplete regarding several project components and potential impacts, including the evaporation pond, compensation reservoir, and cultural and tribal cultural resources—is not a substitute for the complete Preliminary Staff Assessment being made available to the public for comment. Moreover, the delay in releasing the full Preliminary Staff Assessment does not justify shortening the previously promised 45-day public comment period.

Accordingly, the Center respectfully requests that the Committee restore the 45-day public comment period, as originally contemplated and as reflected in CEC Staff's Motion (TN 262571 at 7).

April 9, 2025



Zeynep J. Graves  
Lisa T. Belenky  
Center for Biological Diversity  
2100 Franklin St., Suite 375  
Oakland, CA 94612  
T: 510.844.7160  
[zgraves@biologicaldiversity.org](mailto:zgraves@biologicaldiversity.org)  
[lbelenky@biologicaldiversity.org](mailto:lbelenky@biologicaldiversity.org)

Attorneys for Intervenor,  
Center for Biological Diversity