

DOCKETED

Docket Number:	21-AFC-02
Project Title:	Willow Rock Energy Storage Center
TN #:	246832
Document Title:	Willow Rock Energy Storage - Status Report 2
Description:	N/A
Filer:	Alisha Pember
Organization:	California Unions for Reliable Energy
Submitter Role:	Intervenor
Submission Date:	10/26/2022 12:22:13 PM
Docketed Date:	10/26/2022

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
STATUS REPORT NO. 2**

October 26, 2022

Tanya A. Gulesserian
Tara C. Rengifo
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Voice
(650) 589-5062 Facsimile
TRengifo@admamsbroadwell.com

Attorneys for California Unions for
Reliable Energy

INTRODUCTION

California Unions for Reliable Energy (“CURE”) submits this status report pursuant to the Committee Scheduling Order issued on August 31, 2022. In its Scheduling Order, the Committee ordered the parties to file and serve a Status Report on or before the 26th of each month.

DISCUSSION

CURE attended the workshop held on October 11, 2022, which addressed the Applicant’s objections to certain data requests in set 1 submitted by California Energy Commission (“CEC”) Staff (“Staff”) on July 26, 2022. The purpose of the workshop was to clarify the Applicant’s objections and limit the number and scope of issues to be presented to the Committee in a potential Motion to Compel by Staff. CURE will review the joint statement describing the outcome of the workshop, including the agreements reached at the workshop to resolve the objections, once filed.

Discovery is ongoing and CURE is currently working with the assistance of technical experts in air quality, public health, greenhouse gas emissions, biology, noise, geology, and hydrology to identify potential data requests to the Applicant.

Dated: October 26, 2022

Respectfully submitted,

Original Signed by:

Tanya A. Gulesserian

Tara C. Rengifo
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Voice
(650) 589-5062 Facsimile
TRengifo@admamsbroadwell.com

Attorneys for California Unions for
Reliable Energy