

DOCKETED

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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)
)
_____)

**WILLOW ROCK ENERGY STORAGE CENTER
STATUS REPORT NO. 2**

Pursuant to the *Committee Scheduling Order* (“Scheduling Order”) docketed August 31, 2022¹, GEM A-CAES LLC (“the Applicant”) hereby submits this status report to inform the Committee regarding the progress of the Application for Certification (“AFC”) proceeding for the Willow Rock Energy Storage Center (“Willow Rock”).²

I. STAFF’S DATA REQUEST SET 1

The Applicant submitted Data Response Set 1³ and Data Response Set 1B⁴ in response to Staff’s Data Request Set 1. Applicant initially planned on submitting Data Response Set 1C, which will include responses that are contingent upon the current project optimization activities currently underway, on October 31, 2022. The Applicant has now requested additional time from California Energy Commission (“CEC” or “Commission”) Staff to respond to these requests. Following the completion of project optimization activities, the Applicant will submit responses to Data Requests 20, 21, 22, 23, 33, 80, 88, 89, 101, 102 on or before January 31, 2023.

II. ISSUES RESOLUTION WORKSHOP JOINT WORKSHOP STATEMENT

The Applicant participated in the October 11, 2022 issues resolution workshop. The workshop was productive and collaborative. The Applicant and CEC Staff were able to reach a compromise in several issue areas, and the Applicant thanks Staff for holding the workshop. The Applicant and Staff are in the process of preparing a joint statement summarizing the outcome of the issues resolution workshop.

III. STAFF’S DATA REQUESTS SET 2

The Applicant is reviewing Staff’s Data Requests Set 2, which were docketed on October 21, 2022. The Applicant anticipates that additional time may be required for some of the responses and will provide the appropriate notice pursuant to Section 1769 of the Commission’s regulations.

¹ TN#: 245754.
² TN#: 244313.
³ TN#: 245698.
⁴ TN#: 246210, 246219.

IV. RESPONSE ON THE COMMISSION’S CULTURAL RESOURCES FILING REQUIREMENTS

One matter in Staff’s Data Requests Set 2 merits attention. The “Background” section to Data Requests 120 through 127 takes issue with the number of filings made with respect to cultural resources.⁵ However, the Applicant was directed to follow the CEC’s filing size and format guidelines. Specifically, the Commission has imposed a size restriction of 30 megabytes (“MB”) or less for documents submitted through the confidential filing portal. The CEC-required filings must also be made “readable” and “searchable” in specified formats, among other requirements.


The number of files is a direct result of the Commission’s 30 MB size limitation and related requirements. Cultural resources documents tend to be historic, meaning they are often image files when provided to the Applicant from various databases. In some cases, rendering such a historic image file “readable” and “searchable” can result in a file size larger than 30 MB, which requires the file to be divided into multiple parts. Moreover, cultural resources files also tend to be fairly large in size since the archival and literature search results tend to include scanned pages with handwritten text, large maps, and other types of information that result in large file sizes. In short, the number of filings was unavoidable.

The Applicant welcomes any solution to address the process for docketing large technical documents and files.

Dated: October 26, 2022

Respectfully Submitted,

ELLISON, SCHNEIDER HARRIS & DONLAN LLP

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⁵ TN #: 246724, p. 5.