

VIRTUE & NAJJAR, PC

LAWYERS

RICHARD L. C. VIRTUE  
DANIEL A. NAJJAR  
CARLA R. NAJJAR

OF COUNSEL  
BOB D. BARBEROUSSE  
MARK E. CHAIKEN

2200 BROTHERS ROAD  
P.O. BOX 22249  
SANTA FE, NEW MEXICO  
87502-2249  
PHONE: (505) 983-6101  
FAX: (505) 983-8304

May 18, 2018

**HAND – DELIVERED**

Melanie Sandoval  
Record Bureau Chief  
New Mexico Public Regulations Commission  
1120 Paseo de Peralta  
Santa Fe, NM 87501

FILED IN OFFICE OF

MAY 18 2018

NM PUBLIC REGULATION COMM  
RECORDS MANAGEMENT BUREAU

The Corona Wind Companies Case No. 18-00065-UT.  
Supplemental Testimony of Greg Parent.

Dear Ms. Sandoval:

Enclosed for filing, please find an original and five copies (plus a sixth copy for conforming for our records) of the *Supplemental Testimony of Greg Parent* pursuant to the Hearing Examiners' Order Granting Joint Applicants' Expedited Motion to Submit Supplemental Testimony of Greg Parent dated May 18, 2018.

Please contact me at your earliest convenience with any questions or comments.

Sincerely,

  
Daniel A. Najjar  
Carla R. Najjar  
2200 Brothers Road  
P.O. Box 22249  
Santa Fe, NM 87502-2249  
(505) 983-6101  
dnajjar@virtuelaw.com  
csnajjar@virtuelaw.com

*Attorneys for the Corona Wind Companies*

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

IN THE MATTER OF THE CORONA WIND )  
COMPANIES' JOINT APPLICATION FOR THE )  
LOCATION OF THE CORONA WIND PROJECTS )  
AND THE CORONA GEN-TIE SYSTEM IN )  
LINCOLN, TORRANCE AND GUADALUPE )  
COUNTIES PURSUANT TO THE PUBLIC UTILITY )  
ACT, NMSA 1978, §62-9-3 )

ANCHO WIND LLC, COWBOY MESA LLC, DURAN )  
MESA LLC, RED CLOUD WIND LLC, TECOLOTE )  
WIND LLC, VIENTO LOCO LLC, )

JOINT APPLICANTS. )

---

Case No. 18-00065-UT

FILED IN OFFICE OF

MAY 18 2018

NM PUBLIC REGULATION COMM  
RECORDS MANAGEMENT BUREAU

**DIRECT TESTIMONY OF**

**GREG PARENT**

**ON BEHALF OF THE CORONA WIND COMPANIES**

1   **Q     PLEASE STATE YOUR NAME.**

2   A.    Greg Parent, P.E., S.E. The P.E. stands for licensed Professional Engineer and the S.E.  
3       stands for licensed Structural Engineer.

4   **Q.    BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?**

5   A.    I am employed by Ulteig Engineers, Inc. as a Senior Engineer in the Transmission and  
6       Distribution Department. My business address is 5575 DTC Parkway, Suite 200,  
7       Greenwood Village, CO 80111.

8   **Q.    WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

9   A.    I am providing supplemental testimony on behalf of the Corona Wind Companies, who  
10       are the Joint Applicants in this proceeding. I understand from my clients that after the  
11       initial testimony was filed by Mr. Derek Price, Senior Pre-Construction Manager for the  
12       Pattern Energy Group, LP, ("Pattern") the Commission staff expressed some concerns  
13       that Pattern had not utilized a licensed professional engineer ("P.E.") to support the  
14       calculation of the requested right-of-way width ("ROW") for the proposed Corona Gen-  
15       Tie System. As the lead P.E. for Ulteig Engineers, Inc. assigned to this project, I was  
16       asked to provide this supplemental testimony to address some of the issues identified by  
17       the Commission Staff in the initial filing.

18   **Q.    PLEASE DESCRIBE YOUR EDUCATIONAL AND WORK EXPERIENCE.**

19   A.    I have a Master of Science in Structural Engineering from Lehigh University. I am a  
20       licensed P.E. in 17 states and am also a licensed Structural Engineer in Illinois, Hawaii,  
21       Nevada and Utah. My application for licensure in New Mexico is currently being  
22       processed in this state and I expect it to be approved shortly. I have 9 years of

1 transmission line design experience and have designed approximately 650 miles of  
2 transmission line.

3 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN ANY OTHER**  
4 **PROCEEDING?**

5 A. No. However, before I designed transmission lines I designed building structures. My  
6 specialty was in foundation design. I was hired a few years back to analyze an existing  
7 retaining wall to determine if it had adequate structural capacity. The intent was to use  
8 the report and the corresponding calculations as expert testimony in a legal case, but I  
9 understand the case was settled before it went to trial.

10 **Q. ARE YOU FAMILIAR WITH THE PROPOSED TRANSMISSION LINE**  
11 **FACILITIES WHICH ARE THE SUBJECT OF THIS JOINT APPLICATION?**

12 A. Yes. I have worked closely with Pattern personnel, including Derek Price, in the design  
13 of this project. More specifically, the ROW width requirement calculation for the Corona  
14 Wind 345 kV transmission line ("Corona Gen-Tie Transmission System") was performed  
15 by Ulteig Engineers, Inc. I have also reviewed the testimony filed by Derek Price on  
16 behalf of the Joint Applicants and understand his conclusion that a ROW width for the  
17 proposed transmission line needs to be 180 feet.

18 **Q. DO YOU AGREE WITH MR. PRICE'S TESTIMONY AND CONCLUSIONS?**

19 A. Yes. As indicated above, I have worked closely with Mr. Price and Pattern on this  
20 proposed project and am able to provide some more detail to his testimony to address  
21 some of the concerns raised by the Commission Staff.

22 **Q. PLEASE ELABORATE.**

1 A. Mr. Price states on page 6, lines 11-13 of his testimony an explanation for how ROW  
2 width is determined. He states that generally the ROW width required for an electric high  
3 voltage transmission line is determined by required access for the construction, operation,  
4 and maintenance of the line and for National Electric Safety Code ("NESC") compliance.  
5 I agree with this testimony but would also add compliance with the requirements of the  
6 Environmental Protection Agency ("EPA") as an additional factor in determining the  
7 width of a transmission facility. Additionally, on page 7, Mr. Price explains the need for  
8 the 180-foot ROW for the proposed Corona Gen-Tie Transmission System. I agree with  
9 his statements completely but add as an additional factor in warranting the 180-foot  
10 ROW width the need for compliance with the recommended audible noise restrictions.  
11 EPA requirements for audible noise levels at the edge of the ROW are in the interest of  
12 the landowners and intended to reduce the audible noise impact off the approved  
13 transmission ROW.

14 **Q. CAN YOU ELABORATE ON THE BASIC DESIGN CONDITIONS YOU**  
15 **EVALUATED IN DETERMINING THAT A 180-FOOT ROW WAS REQUIRED**  
16 **FOR THESE PROJECTS?**

17 A. Yes. Preliminary design considerations include geotechnical soil studies, topographical  
18 surveys and wind and weather conditions to determine a range of preliminary  
19 specifications for equipment and infrastructure for the proposed location for the proposed  
20 transmission and interconnection facilities. The loading conditions for the transmission  
21 lines follow the requirements stated in the National Electric Safety Code (NESC-2017).  
22 We analyzed the required ROW width for the following load cases:

23 1. NESC 234.C.1.a (At Rest)

24 a. 0 psf wind pressure acting perpendicular to the conductor

- 1                   b. 60 deg Fahrenheit ambient temperature.
- 2       2. NESC 234.C.1.b (6 psf Wind)
- 3                   a. 6 psf wind pressure acting perpendicular to the conductor
- 4                   b. 60 deg Fahrenheit ambient temperature
- 5       3. NESC 250B – Heavy Loading District Loading without load factors
- 6                   a. 4 psf wind pressure acting perpendicular to the conductor
- 7                   b. ½” of radial ice
- 8                   c. 0 deg Fahrenheit ambient temperature
- 9       4. NESC 250C – Extreme Wind. The wind load map in NESC 250C matches the basic wind
- 10           speed map in the American Society of Civil Engineers – Minimum Design Loads for
- 11           Building and Other Structures - ASCE 7-05. The Corona Wind Project extends over a large
- 12           region. The extreme wind speed varies over this region. Part of the Corona Wind project is in
- 13           the 90-mph wind speed region but also extends into a “Special Wind Region”. These special
- 14           wind regions experience higher wind speeds than 90mph. Pattern has determined that the
- 15           extreme wind speed for these special wind regions should be set at 100mph. For consistency
- 16           the extreme wind speed for the entire project has been set to 100mph whether it is inside or
- 17           outside the special wind regions.
- 18                   a. 100 mph wind speed (25.6psf) acting perpendicular to the conductor
- 19                   b. 60 deg Fahrenheit ambient temperature

20       Under these conditions, and the aforementioned considerations, we evaluate the clearances,  
21       conductor movement, and structure deflection to calculate span lengths and structure types and  
22       configurations.

23   **Q.     DO YOU BELIEVE THAT THE CRITERIA YOU RELIED UPON IN**  
24   **DETERMINING THE NECESSITY FOR A 180-FOOT ROW REASONABLE?**

1 A. Yes. These criteria are appropriate and consistent with the accepted practice within the  
2 industry. I have designed approximately a dozen 345kV transmission lines and the right  
3 of way widths for those projects ranged between 150ft – 200ft. The variations in right of  
4 way width for these projects depended on design spans, structure types and audible noise  
5 requirements that were used on each line.

6 **Q. DO YOU HAVE EXHIBITS SUPPORTING YOUR CALCULATIONS THAT**  
7 **WARRANT THE 180-FOOT ROW WIDTH THAT THE JOINT APPLICANTS'**  
8 **REQUEST IN THIS PROCEEDING?**

9 A. Yes. Please see the attached exhibit titled GP-1.

10 **Q. PLEASE EXPLAIN THE INFORMATION CONTAINED IN EXHIBIT GP-1.**

11 A. Page 1 of this exhibit provides the calculations for the NESC required horizontal  
12 clearances from the transmission line conductor to building structures for NESC Rules  
13 234B1a, 234B1b. Also provided is the recommended horizontal clearance when the  
14 transmission line is subject to 100mph wind speed. The above clearances have been  
15 adjusted for an altitude of 7100ft. The following pages of this Exhibit GP-1 illustrate the  
16 results of the blowout analysis for three different structure types. The three structure  
17 types are as follows:

- 18 • Double Circuit Steel Monopole,
- 19 • Single Circuit Steel Monopole
- 20 • Single Circuit Wood H-Frame.

21 The actual structure types that will be used on this project have not yet been determined  
22 and will depend on material lead times, material costs and construction cost of the



different structure types. It is critical that the ROW be wide enough to accommodate any of the above structure types.

To determine conductor blowouts and pole deflections each structure type was modeled using a bundled (2) 954kcmil ASCR "Cardinal" conductor per phase. A 1300 ft design span between structures was assumed. Actual design spans could vary depending on the topography. A design span of 1300ft would likely be a maximum design span. Pole heights were determined to provide adequate vertical clearance under the conductor during maximum operating temperature at mid-span assuming flat terrain.

Each structure type was analyzed under the following four different load cases:

1. NESC Rule 234B1a – [At Rest Condition, 0 psf wind, 60 degF]
2. NESC Rule 234B1b – [6psf Condition, 6 psf wind, 60 degF]
3. NESC Rule 250B – Heavy Region [4psf wind, ½" Radial Ice, 0 degF]
4. NESC Rule 250C – Extreme Wind [100 mph (25.6 psf), 60 degF]

To determine the conductor blowouts and pole deflections, each structure type and each load case was modeled in the transmission line design software PLS-CADD. The results of the required right of way width are illustrated in Exhibit GP-1. The controlling structure type and load case were the single circuit wood H-Frame under NESC Rule 250C – Extreme Wind [100 mph (25.6 psf), 60 degF]. This structure type and load case would require a minimum right of way width approximately 177'-5" wide, which is just shy of the requested 180'-0" Right of Way width. A detailed analysis of the H-Frame structure under the 250C – Extreme Wind case is provided in the last (4) pages of Exhibit GP-1. This structure and load case control the Right of Way width.



1 Another calculation that was performed was the audible noise volume that would be  
2 heard at the edge of the right of way. In 1974, the Environmental Protection Agency  
3 (EPA) published *Information on Levels of Environmental Noise Requisite to Protect*  
4 *Public Health and Welfare with an Adequate Margin of Safety* in which the EPA set  
5 55dBA as the outdoor noise threshold that would prevent activity interference or  
6 annoyance. Many utilities I have worked with have a 50dBA noise threshold limit at the  
7 edge of the right of way. Page 14 of Exhibit GP-1 shows the calculations of the audible  
8 noise for the Single Circuit Wood H-Frame structure. In this analysis the audible noise  
9 produced by the transmission line would be 49.61 dBA 90ft from the transmission line  
10 center line (90ft x 2 = 180ft ROW). With the transmission line centered in a right of way  
11 width of 180ft the audible noise produced is just under the recommended 50dBA limit.  
12 From the analysis performed to determine required ROW widths, it is my opinion that a  
13 right of way of 180ft is appropriate for this line.

14 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

15 **A. Yes.**

Ulteig Engineering  
 Project Name: Corona Wind Farm Project  
 Required NESC Horizontal Clearances - Rule 234B1a & 234B1b  
 Engineer: Greg Parent  
 Date: 04-19-18



(VN) = Nominal Operating Voltage Phase-Phase (kV)

$$V_N := 345 \text{ kV}$$

(VM) = Max Transient Overvoltage Phase-Phase (kV)

$$V_M := 1.05 \cdot V_N = 362.25 \text{ kV}$$

(Elev) = Design Elevation (ft)

$$Elev := 7100 \text{ ft}$$

(CHAR) = Required Horizontal Clearance At Rest (ft) NESC RULE 234B1a

(CH@6psf) = Required Horizontal Clearance under 6psf (ft) NESC RULE 234B1b

(CH@100mph) = Recommended Horizontal Clearance under 100mph

$$CH_{AR} := 7.5 \text{ ft} + ((50 \text{ kV} - 22 \text{ kV})) \cdot \left( \frac{0.4 \frac{\text{in}}{\text{kV}}}{12 \frac{\text{in}}{\text{ft}}} \right) + \left( \left( \frac{V_M}{\sqrt{3}} - 50 \text{ kV} \right) \cdot \left( \frac{0.4 \frac{\text{in}}{\text{kV}}}{12 \frac{\text{in}}{\text{ft}}} \right) \cdot 1.03 \frac{Elev - 3300 \text{ ft}}{1000 \text{ ft}} \right)$$

$$CH_{AR} = 14.369 \text{ ft}$$

$$CH_{@6psf} := 4.5 \text{ ft} + ((50 \text{ kV} - 22 \text{ kV})) \cdot \left( \frac{0.4 \frac{\text{in}}{\text{kV}}}{12 \frac{\text{in}}{\text{ft}}} \right) + \left( \left( \frac{V_M}{\sqrt{3}} - 50 \text{ kV} \right) \cdot \left( \frac{0.4 \frac{\text{in}}{\text{kV}}}{12 \frac{\text{in}}{\text{ft}}} \right) \cdot 1.03 \frac{Elev - 3300 \text{ ft}}{1000 \text{ ft}} \right)$$

$$CH_{@6psf} = 11.369 \text{ ft}$$

$$CH_{@100mph} := 345 \text{ kV} \cdot \frac{0.1 \frac{\text{in}}{\text{kV}}}{12 \frac{\text{in}}{\text{ft}}} \cdot 1.03 \frac{Elev - 3300 \text{ ft}}{1000 \text{ ft}}$$

$$CH_{@100mph} = 3.217 \text{ ft}$$

Assuming 10kV per inch dielectric constant for air



*Joshua E. Potts*  
 5-17-2018

# CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

Rev. Date Description By

1 04-15-2014 ROW EXHIBITS

UB

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037

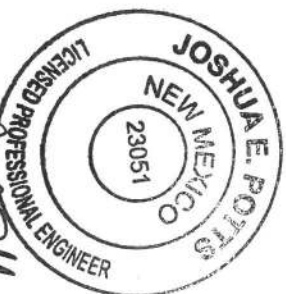
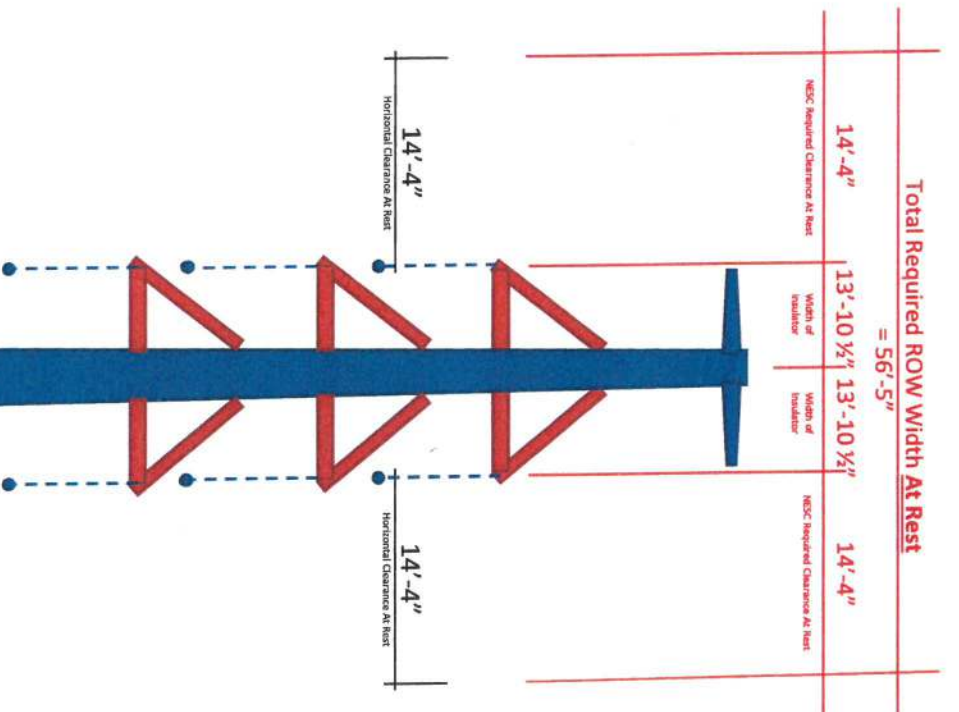


Exhibit GP-1  
Page 2 of 18

3550 3600 Avenida Santa Fe  
Santa Fe, NM 87505-5814  
Phone 701.237.3191  
Fax 701.237.3191  
www.ateeg.com  
Batteries: Denver, Colorado; 1-seg; Size: 16 - 18 ft  
Design By: ATEEG  
Drawn By: ATEEG  
Project Number: A

ROW WIDTH  
EXHIBITS  
DC STEEL MONOPOLE

COR-TLO-E-ROW-00



*JP*  
5-17-2016

## STRUCTURE AND CONDUCTOR INFORMATION

Operational Voltage: 345kV  
Structure Type = Double Circuit Steel Monopole  
Insulator Type = Brace-Post Insulator  
Typical Design Span = 1300ft  
Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"  
NESC Rule Analyzed: 234B1a  
Weather Condition Displayed = 0 PSF - 60 deg F

SCALE: NTS

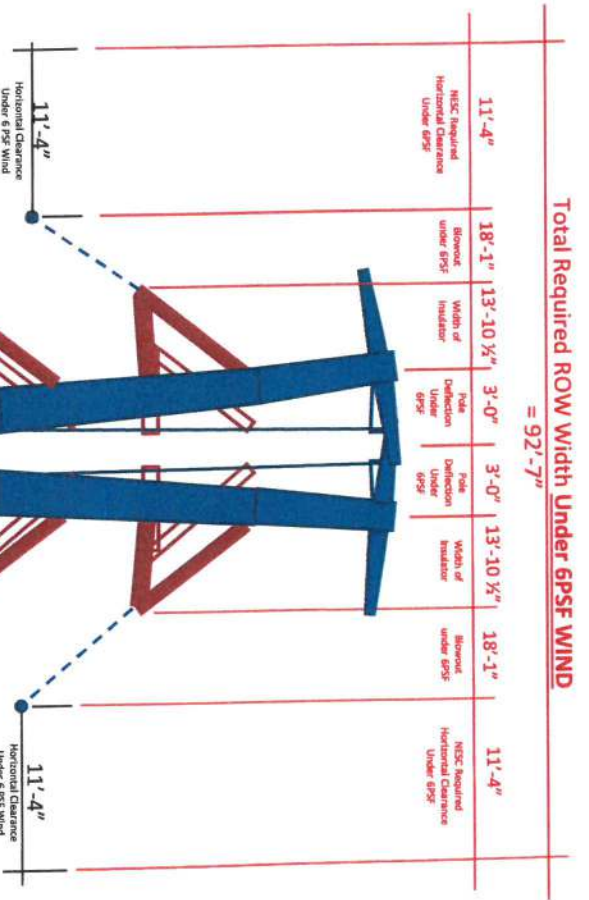
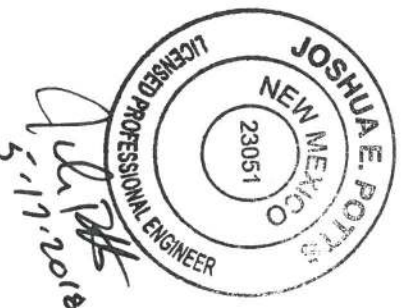
# CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

Scale: 1/8" = 1'-0"  
A 3/4" x 3/4" ROW EXHIBITS 1/8"

DATE: 10/1/2018  
BY: JEP  
CHECKED BY: JEP  
APPROVED BY: JEP  
PROJECT NUMBER: 1801

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037



## STRUCTURE AND CONDUCTOR INFORMATION

Operational Voltage: 345kV  
Structure Type = Double Circuit Steel Monopole  
Insulator Type = Brace-Post Insulator  
Typical Design Span = 1300ft  
Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"  
NESC Rule Analyzed: 234B1b  
Weather Condition Displayed = 6 psf (48.4mph) @ 60 deg F  
Pole Deflections and Conductor Blowouts calculated from analysis of pole models in PLS-CADD.

SCALE: NTS

Exhibit GP-1  
Page 3 of 18

3150 34th Avenue South  
Fargo, North Dakota 58104  
Phone: 701.282.0500  
Fax: 701.237.2191  
www.ureg.com

### ROW WIDTH EXHIBITS

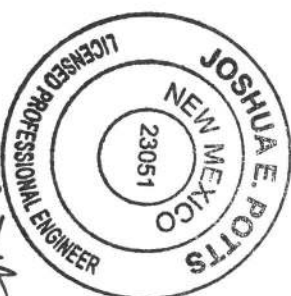
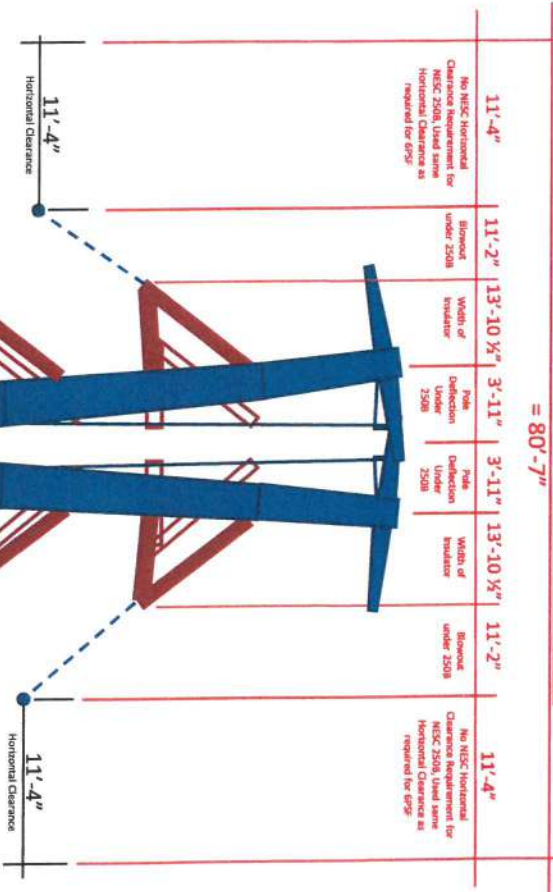
DC STEEL MONOPOLE

REVISION:

COR-TLO-E-ROW-00



Total Required ROW Width Under 2508 W/O OLF = 80'-7"



*Jul 17th*  
*5.17.2018*

# **STRUCTURE AND CONDUCTOR INFORMATION**

Operational Voltage: 345kV  
 Structure Type = Double Circuit Steel Monopole  
 Insulator Type = Brace-Post Insulator  
 Typical Design Span = 1300ft  
 Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"  
 NESC Rule Analyzed: 2508 W/O OLF  
 Weather Condition Displayed = 4 PSF (40mph) with 1/2" Radial Ice, 0 deg F  
 Pole Deflections and Conductor Blowouts calculated from analysis of pole models in PLS-CADD.

SCALE: NTS

## **CORONA WIND PROJECT**

LINCOLN AND TORRANCE  
 COUNTIES, NEW MEXICO

Rev. Date Description By

A 04-10-2018 ROW EX-08123 JES

PATTERN ENERGY GROUP  
 4226 EXECUTIVE SQUARE  
 LA JOLLA, CA 92037



3350 38th Avenue South  
 Flagstaff, Arizona 86001  
 Phone: 928.779.2200  
 Fax: 928.779.2100  
 www.alfing.com

Designed By: [Signature]  
 Drawn By: [Signature]  
 Approved By: [Signature]  
 Project Number:

## **ROW WIDTH EXHIBITS**

DC STEEL MONOPOLE

REVISION: A

COR-TLO-E-ROW-00:

Exhibit GP-1  
 Page 4 of 18

# CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

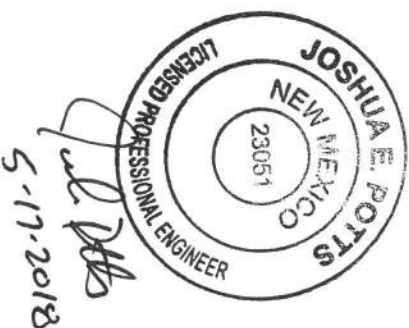
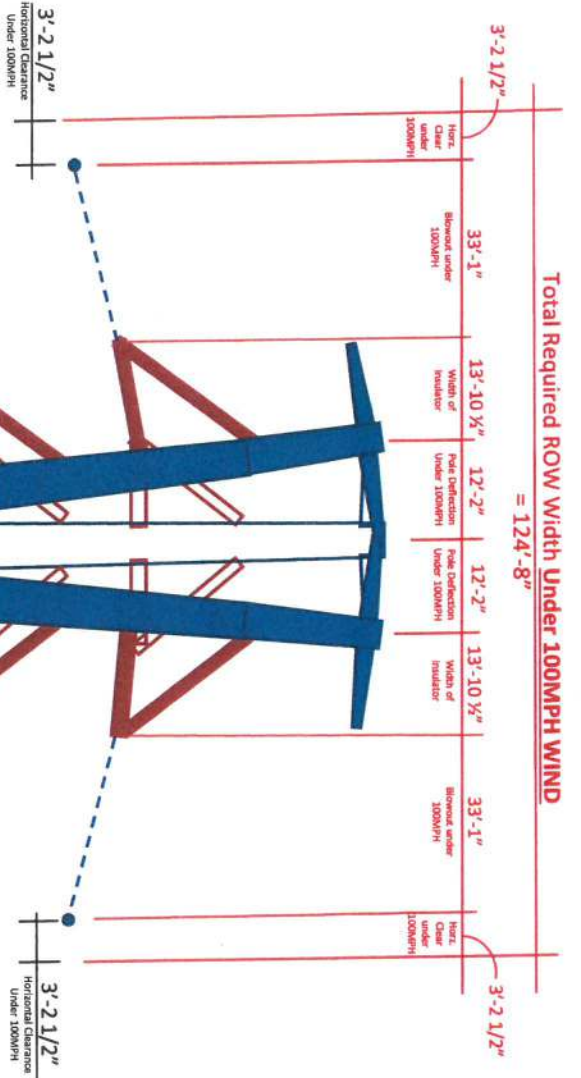
Per: Date: Description: By: 04-18-2018 ROW EXHIBITS (S)

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037



**STRUCTURE AND CONDUCTOR INFORMATION**  
Operational Voltage: 345KV  
Structure Type = Double Circuit Steel Monopole  
Insulator Type = Brace-Post Insulator  
Typical Design Span = 1300ft  
Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"  
NESC Rule Analyzed: 250C  
Weather Condition Displayed = 100 MPH @ 60 deg F  
Pole Deflections and Conductor Blowouts calculated from analysis of pole models in PLS-CADD.

SCALE: NTS



**NOT FOR  
CONSTRUCTION**

# CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

Rev. Date Description By

1 04-16-2018 ROW EXHIBITS JES

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037



Exhibit GP-1  
Page 6 of 18

2350 Santa Ana Road South  
Piquito, New Mexico 87114  
Phone: 703.290.6500  
Fax: 703.237.3191  
www.uleap.com  
Design By: Uleap  
Drawn By: [Signature]  
Checked By: [Signature]  
Reviewed By: [Signature]  
Status: Owner - Detail Later - [Signature] - [Signature] - [Signature]  
Project Number:

## ROW WIDTH

### EXHIBITS

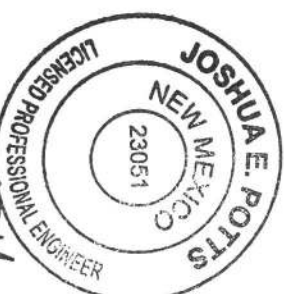
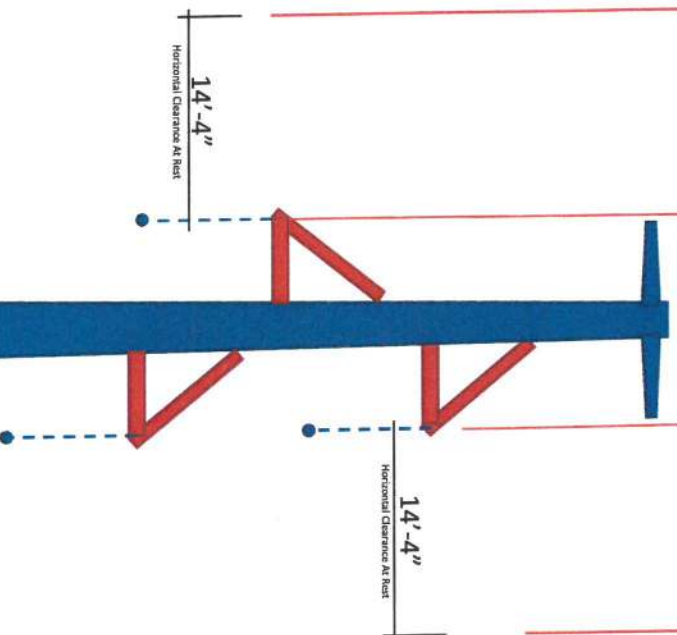
SC STEEL MONOPOLE

REVISION:

A

COR-TLO-E-ROW-001

Total Required ROW Width At Rest			
= 56'-5"			
NESC Required Clearance At Rest	14'-4"	Width of Insulator	13'-10 1/2"
NESC Required Clearance At Rest	14'-4"	Width of Insulator	13'-10 1/2"
NESC Required Clearance At Rest	14'-4"		



*JEP*  
5-17-2018

## STRUCTURE AND CONDUCTOR INFORMATION

Operational Voltage: 345kV

Structure Type = Single Circuit Steel Monopole

Insulator Type = Brace-Post Insulator

Typical Design Span = 1300ft

Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"

NESC Rule Analyzed: 234B1a

Weather Condition Displayed = 0 PSF @ 60 deg F

SCALE: NTS

**NOT FOR  
CONSTRUCTION**



# CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

Rev. Date Description By  
A 04-15-2018 NEW EXHIBITS LK

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037

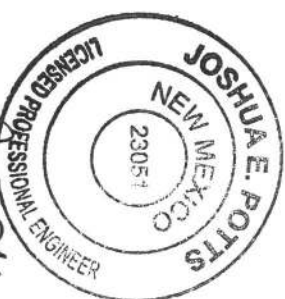
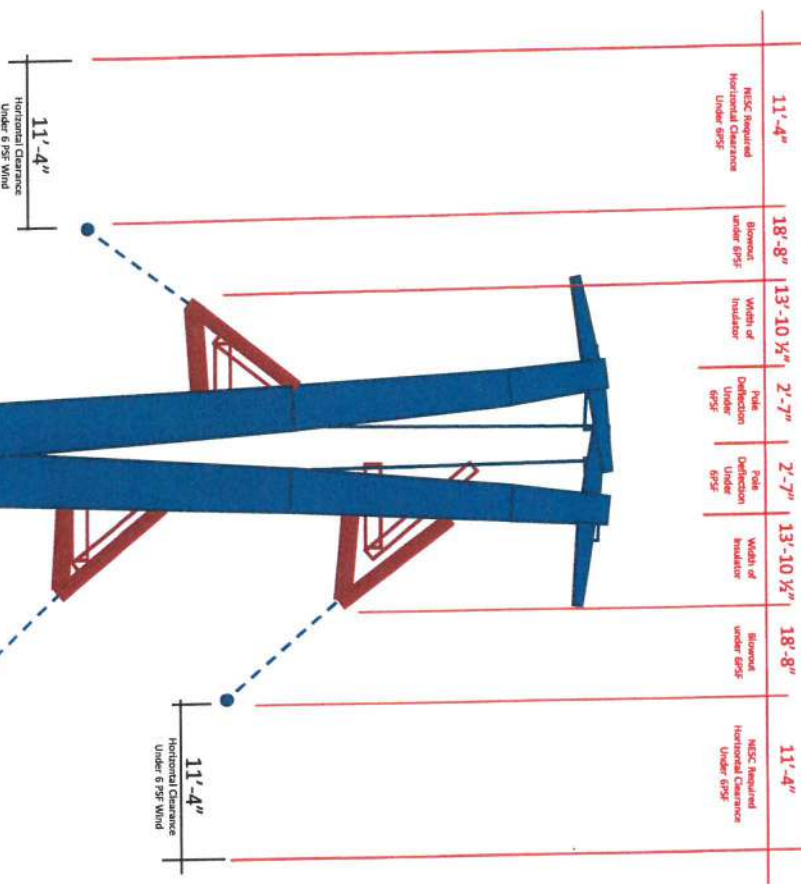


Exhibit GP-1  
Page 7 of 18

3350 36th Avenue South  
Flagg, Utah, Colorado 81104  
Phone: 719.590.6500  
Fax: 719.227.2781  
www.uleap.com  
Design By:  
Approved By:  
Checked By:  
Project Number:

ROW WIDTH  
EXHIBITS  
SC STEEL MONOPOLE  
REVISION:  
A  
COR-TLO-E-ROW-001

Total Required ROW Width Under 6PSF WIND  
= 92'-11"



## STRUCTURE AND CONDUCTOR INFORMATION

Operational Voltage: 345kV

Structure Type = Single Circuit Steel Monopole

Insulator Type = Brace-Post Insulator

Typical Design Span = 1300ft

Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"

NESC Rule Analyzed: 234B1b

Weather Condition Displayed = 6 psf (48.4mph) @ 60 deg F

Pole Deflections and Conductor Blowouts calculated from

analysis of pole models in PLS-CADD.

SCALE: NTS

NOT FOR  
CONSTRUCTION

# CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

Rev	Date	Description	By
A	04-19-2018	NON EXHIBITS	LEI

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037



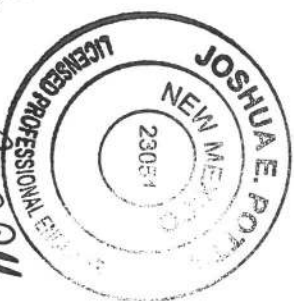
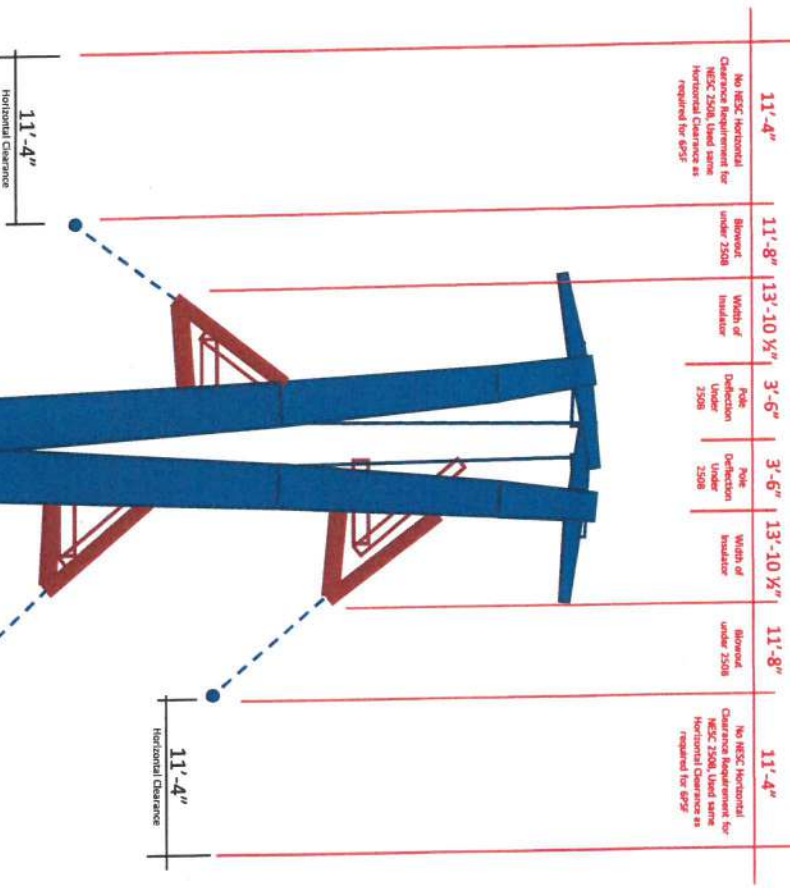
## Exhibit GP-1 Page 8 of 18

3150 34th Avenue South  
Flagstaff, AZ 86001  
Phone: 701.232.0500  
Fax: 701.232.2191  
www.ullrich.com

Designed By:  
Checked By:  
Reviewed By:  
Drawn By:  
Project Number:

ROW WIDTH  
EXHIBITS  
SC STEEL MONOPOLE  
REVISION:  
A  
COR-TLO-E-ROW-00

Total Required ROW Width Under 250B W/O OLF  
= 80'-9"



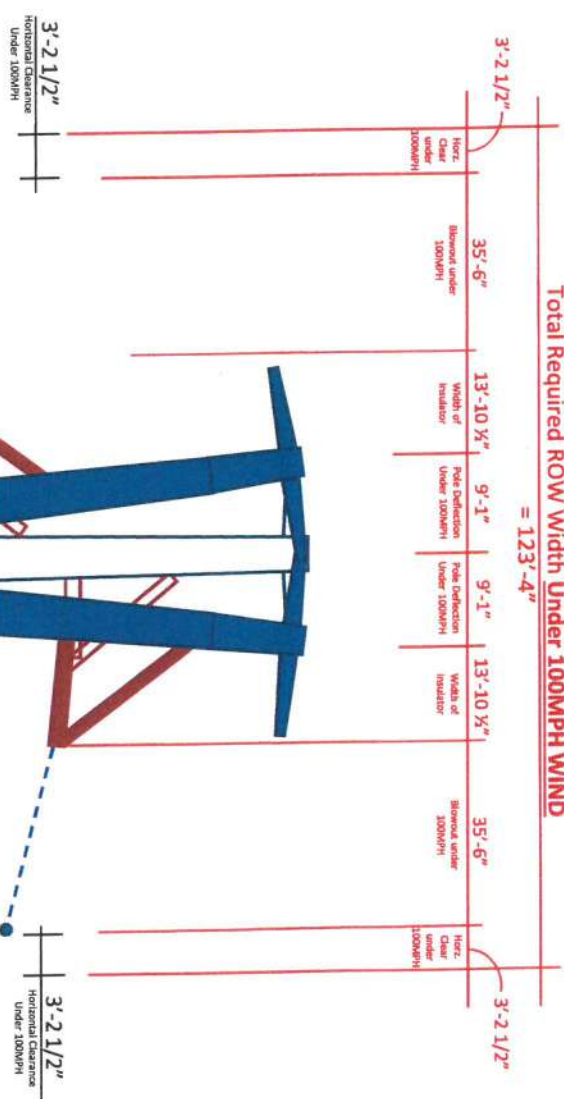
5-17-2018  
J.E. Potts

NOT FOR  
CONSTRUCTION

**STRUCTURE AND CONDUCTOR INFORMATION**  
Operational Voltage: 345kV  
Structure Type = Single Circuit Steel Monopole  
Insulator Type = Brace-Post Insulator  
Typical Design Span = 1300ft  
Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"  
NESC Rule Analyzed: 250B W/O OLF  
Weather Condition Displayed = 4 PSF (40mph) with 1/2" Radial Ice, 0 deg F.  
Pole Deflections and Conductor Blowouts calculated from analysis of pole models in PLS-CADD.

SCALE: NTS

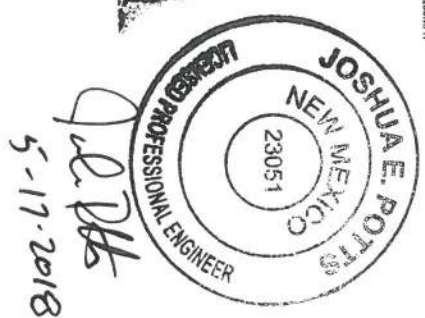
**Total Required ROW Width Under 100MPH WIND**  
= 123'-4"



**STRUCTURE AND CONDUCTOR INFORMATION**

Operational Voltage: 345kV  
 Structure Type = Single Circuit Steel Monopole  
 Insulator Type = Brace-Post Insulator  
 Typical Design Span = 1300ft  
 Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"  
 NESC Rule Analyzed: 250C  
 Weather Condition Displayed = 100 MPH @ 60 deg F  
 Pole Deflections and Conductor Blowouts calculated from analysis of pole models in PLS-CADD.

SCALE: NTS



**NOT FOR  
CONSTRUCTION**

CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

Rev. Date Description By  
 1 04-18-2018 ROW EXHIBITS JED

PATTERN ENERGY GROUP  
 4225 EXECUTIVE SQUARE  
 LA JOLLA, CA 92037



Exhibit GP-1  
 Page 9 of 18

Utility  
 3150 Main Avenue South  
 Phoenix, Arizona 85004  
 Phone: 710.280.0500  
 Fax: 710.237.3191  
 www.utility.com  
 Drawn By: [Signature]  
 Checked By: [Signature]  
 Design By: [Signature]  
 Issues - Owner: [Signature]  
 Project Number:

ROW WIDTH  
 EXHIBITS

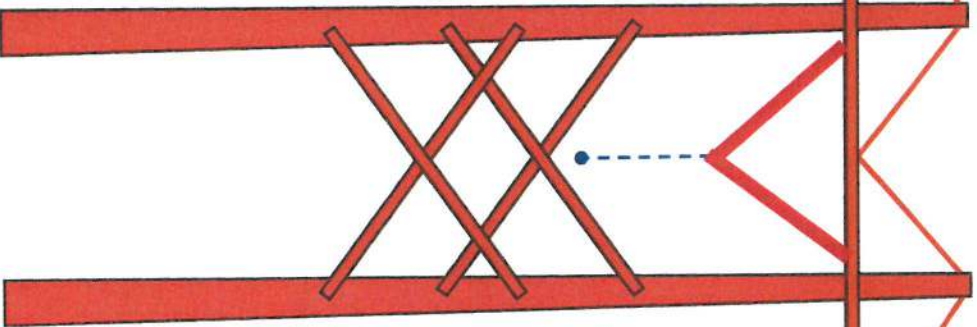
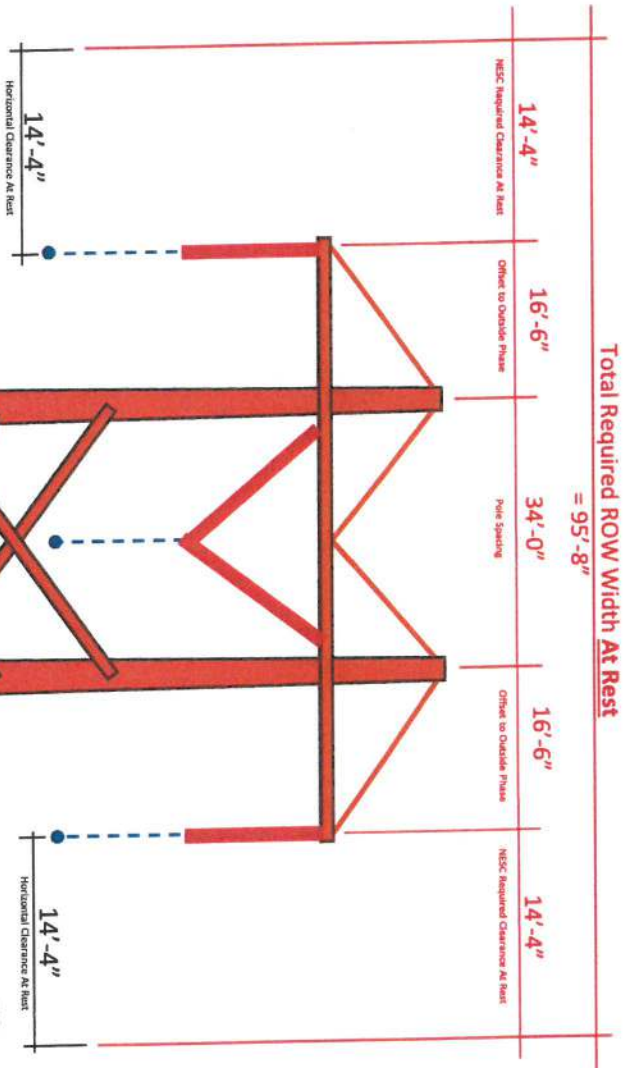
SC STEEL MONOPOLE

REVISION  
 A

COR-TLO-E-ROW-001

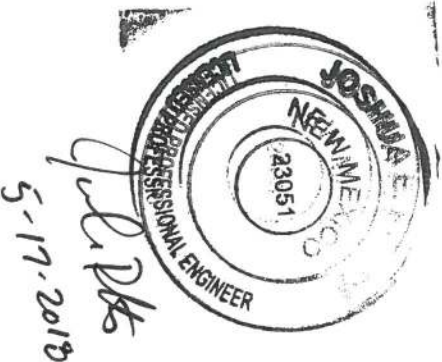


Total Required ROW Width At Rest  
= 95'-8"



SCALE: NTS

NOT FOR  
CONSTRUCTION



## STRUCTURE AND CONDUCTOR INFORMATION

Operational Voltage: 345kV  
Structure Type = Single Circuit Wood H-Frame  
Insulator Type = Suspension Insulators, I & V Type  
Typical Design Span = 1300ft  
Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"  
NESC Rule Analyzed: 234B1a  
Weather Condition Displayed = 0 PSF @ 60 deg F

## CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

Rev. Date Description By LBL

A 04-13-2018 ROW EXHIBITS

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037



Exhibit GP-1  
Page 10 of 18

3350 36th Avenue South  
Flagstaff, New Mexico 86104  
Phone: 701.590.0500  
Fax: 701.221.2100  
Email: info@patternenergy.com  
Design By:  
Reviewed By:  
Approved By:  
Project Number:

## ROW WIDTH

### EXHIBITS

SC WOOD H-FRAME

NEWBORN

COR-TLO-E-ROW-001

# CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

DATE: 05-17-2013  
BY: J.E.P.

PROJECT NUMBER: 101

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037



Exhibit GP-1  
Page 11 of 18

3150 36th Avenue South  
Flagstaff, AZ 86001  
Phone: 719.227.2101  
Fax: 719.227.2101  
www.ullrich.com

Designed By: Ullrich  
Checked By: Ullrich  
Project Number: 101

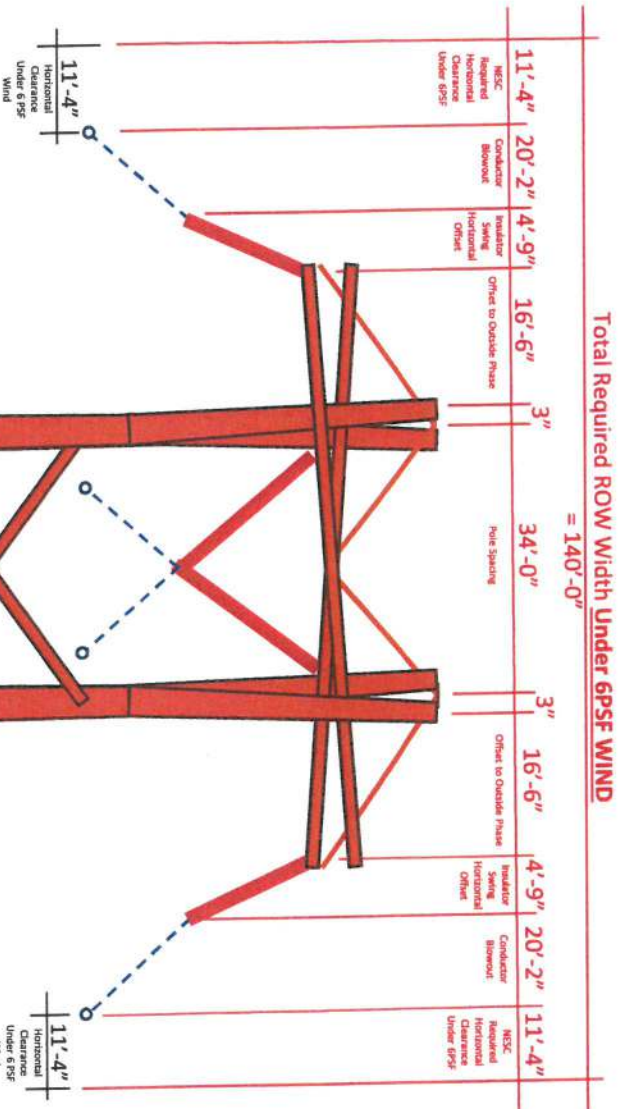
ROW WIDTH

EXHIBITS

SC WOOD H-FRAME

REVISION:

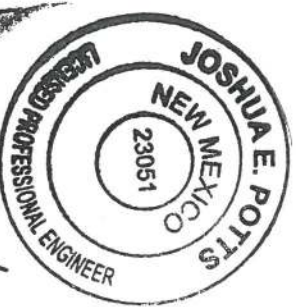
COR-TLO-E-ROW-01



SCALE: NTS

## STRUCTURE AND CONDUCTOR INFORMATION

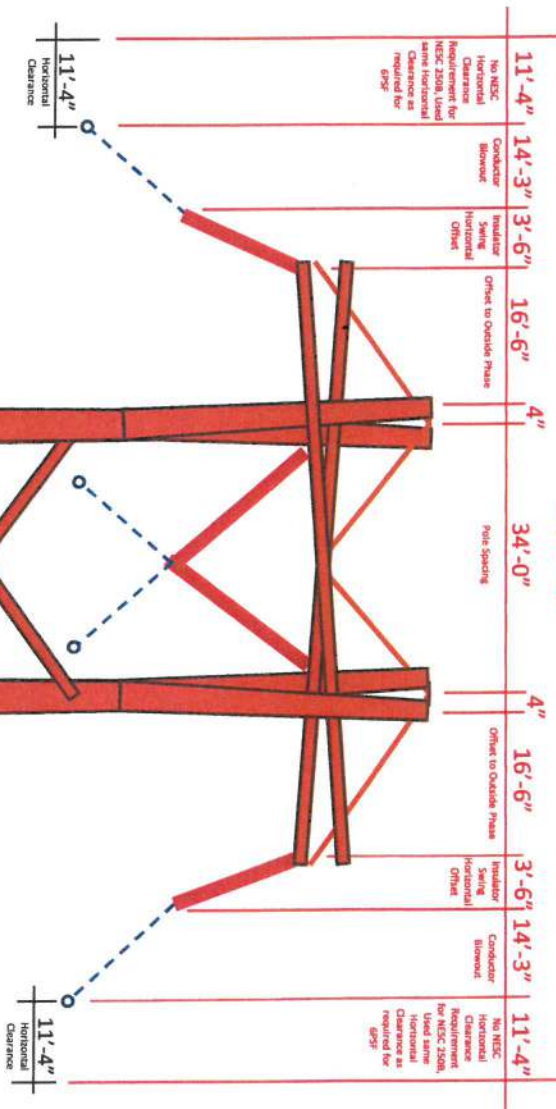
Operational Voltage: 345KV  
Structure Type = Single Circuit Wood H-Frame  
Insulator Type = Suspension Insulators, I & V Type  
Typical Design Span = 1300ft  
Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"  
- NESC Rule Analyzed: 234B1b  
Weather Condition Displayed = 6 psf (48.4mph) @ 60 deg F  
Pole Deflections, Insulator Swings and Conductor Blowouts  
calculated from analysis of pole models in PLS-CADD.



*Joshua E. Potts*  
5-17-2013

**NOT FOR  
CONSTRUCTION**

Total Required ROW Width Under 2508 W/O OLF  
= 125'-10"



## STRUCTURE AND CONDUCTOR INFORMATION

Operational Voltage: 345KV

Structure Type = Single Circuit Wood H-Frame

Insulator Type = Suspension Insulators, I & V Type

Typical Design Span = 1000ft

Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"

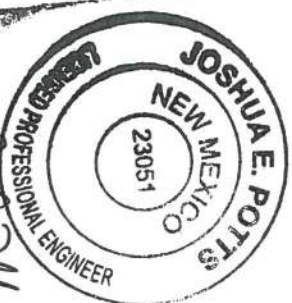
NESC Rule Analyzed: 2508 W/O OLF

Weather Condition Displayed = 4 PSF (40mph) with 1/2" Radial Ice, 0 deg F

Pole Deflections, Insulator Swings and Conductor Blowouts calculated

from analysis of pole models in PLS-CADD.

SCALE: NTS



*JEP*  
5-17-2018

**NOT FOR  
CONSTRUCTION**

CORONA WIND PROJECT

LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

Rev. Date Description By  
A 04-19-2018 ROW EXHIBITS LFL

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037



Exhibit GP-1  
Page 12 of 18

3250 38th Avenue South  
Flagstaff, AZ 86001  
Phone: 713.202.0600  
Fax: 713.202.0601  
www.ulfeng.com

Business Office: 3250 38th Avenue South  
Flagstaff, AZ 86001  
Phone: 713.202.0600  
Fax: 713.202.0601  
www.ulfeng.com

ROW WIDTH  
EXHIBITS

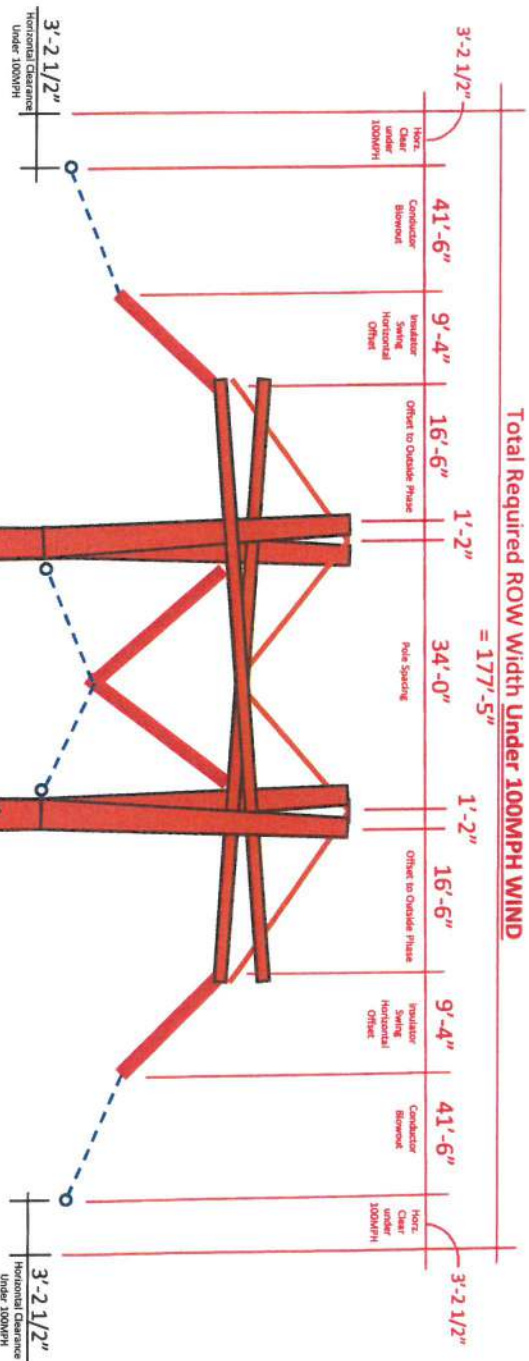
SC WOOD H-FRAME

REVISION:  
A

COR-TLO-E-ROW-01



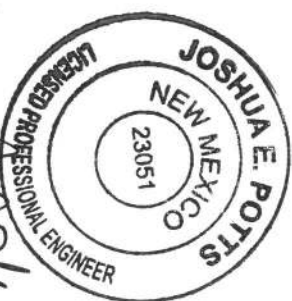
Total Required ROW Width Under 100MPH WIND  
= 177'-5"



# STRUCTURE AND CONDUCTOR INFORMATION

- Operational Voltage: 345KV
- Structure Type = Single Circuit Wood H-Frame
- Insulator Type = Suspension Insulators, I & V Type
- Typical Design Span = 1300ft
- Conductor Type = Bundled (2) 954kcmil ACSR "CARDINAL"
- NESC Rule Analyzed: 250C
- Weather Condition Displayed = 100 MPH @ 60 deg F
- Pole Deflections, Insulator Swings and Conductor Blowouts calculated from analysis of pole models in PLS-CADD.

SCALE: NTS



*JEP*  
5-17-2018

**NOT FOR  
CONSTRUCTION**

CORONA WIND PROJECT  
LINCOLN AND TORRANCE  
COUNTIES, NEW MEXICO

PATTERN ENERGY GROUP  
4225 EXECUTIVE SQUARE  
LA JOLLA, CA 92037



3050 36th Avenue South  
Tulsa, Oklahoma 74114  
Phone: 701.227.3151  
Fax: 701.227.3151  
www.aleg.com

Design By:  
Checked By:  
Approved By:  
Project Number:

ROW WIDTH

EXHIBITS

SC WOOD H-FRAME

REVISION

A

COR-TLO-E-ROW-01;

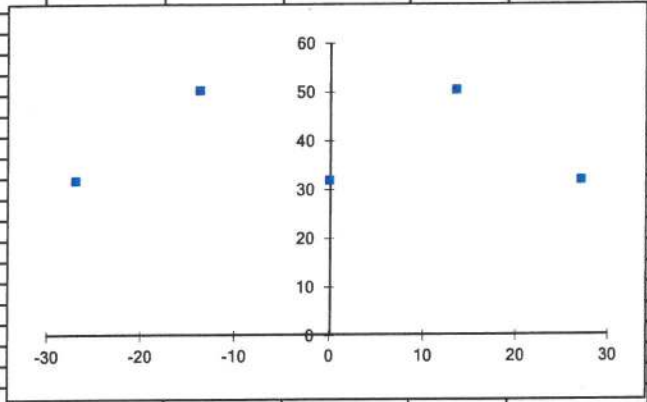
Exhibit GP-1  
Page 13 of 18



Audible Noise Calculation										
Project Name: Corona Wind Project										
Engineer: Greg Parent										
Bundle	x-feet	y-feet	n cond	cond dia	spacing	I-n voltage	phase	Kv/cm		
1	27	32	2	1.196	18	205	0	15.1994		
2	0	32	2	1.196	18	205	120	16.3518		
3	-27	32	2	1.196	18	205	240	15.2031		
4	13.5	50.5	1	0.6		0	0	4.1242		
5	-13.7	50.5	1	0.6		0	0	4.1462		
6								0.0000		
7								0.0000		
8								0.0000		
NPH=	5.00	Calculated	Altitude ft=	7100						
(Inverse	8343.59	Dummy Output)	Note: Use "Paste Special" and "values" to copy data							
Dist		L50 rain								
Away from Center Line (ft)	Vert	Decibels at distance away from centerline [db]								
-300	5	43.66	O.K.							
-280	5	44.00	O.K.							
-260	5	44.37	O.K.	Goal: output in C column < 50 DB						
-240	5	44.76	O.K.							
-220	5	45.19	O.K.							
-200	5	45.66	O.K.							
-180	5	46.18	O.K.							
-160	5	46.77	O.K.							
-140	5	47.43	O.K.							
-120	5	48.18	O.K.							
-100	5	49.08	O.K.							
-90	6	49.61	O.K.							
-80	5	50.16	N.G.							
-60	5	51.49	N.G.							
-40	5	53.04	N.G.							
-20	5	54.31	N.G.							
0	5	54.88	N.G.							
20	5	54.31	N.G.							
40	5	53.04	N.G.							
60	5	51.48	N.G.							
80	5	50.15	N.G.							
90	6	49.61	O.K.							
100	5	49.08	O.K.							
120	5	48.18	O.K.							
140	5	47.42	O.K.							
160	5	46.77	O.K.							
180	5	46.18	O.K.							
200	5	45.66	O.K.							
220	5	45.19	O.K.							
240	5	44.76	O.K.							
260	5	44.37	O.K.							
280	5	44.00	O.K.							
300	5	43.66	O.K.							
Max Decibels =		54.88								

Ulteig

We listen. We solve.



Joshua E. Potts
   
 5.17.2018

The table below is a screen shot of a report from PLS CADD which shows the structure deflections for each load case. The controlling case is highlighted below:

Summary of Tip Deflections For All Load Cases:

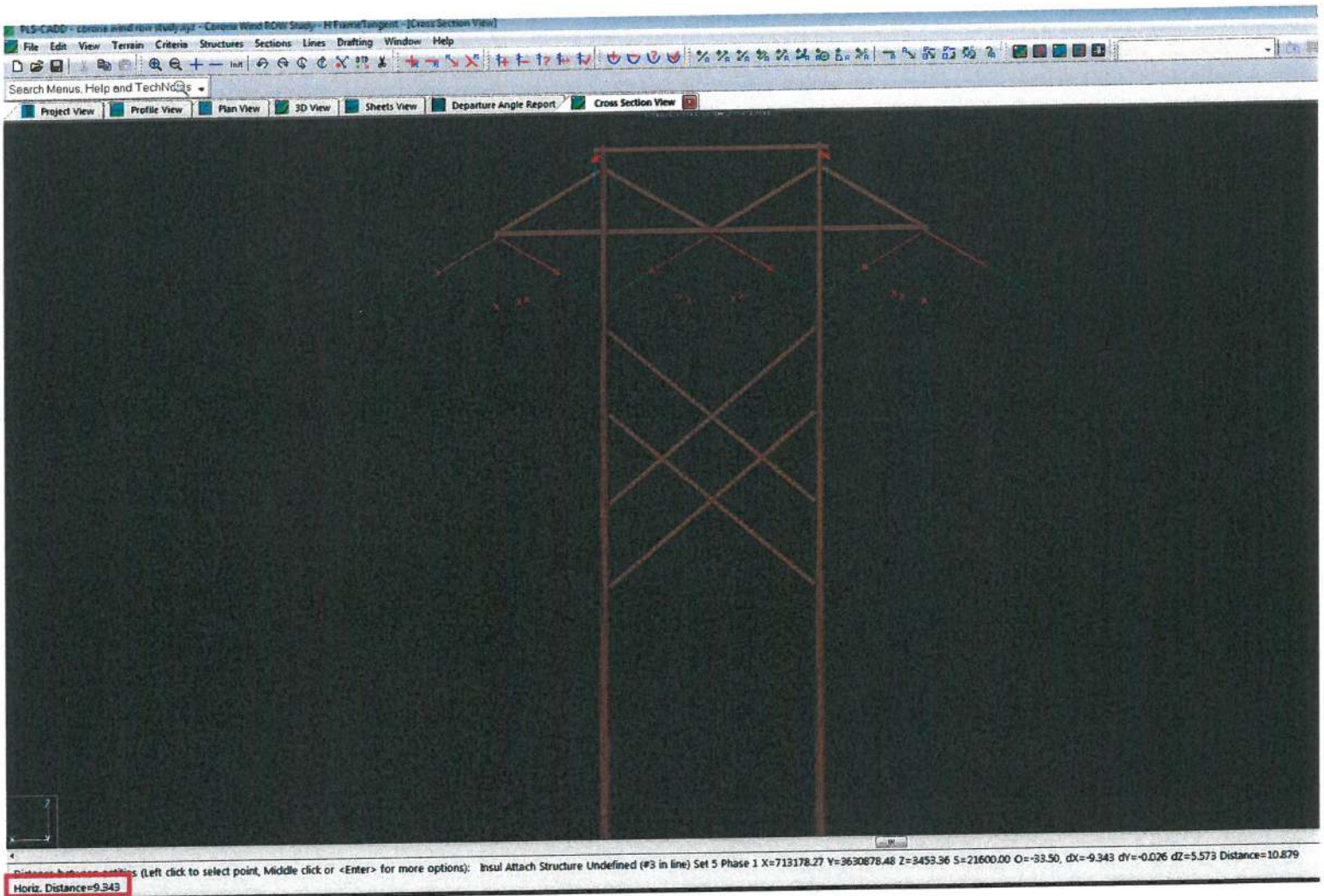
Note: positive tip load results in positive deflection

Load Case	Joint Label	Long. Defl. (in)	Tran. Defl. (in)	Vert. Defl. (in)	Resultant Defl. (in)	Long. Rot. (deg)	Tran. Rot. (deg)	Twist (deg)
NESC 250C EXTREME WIND, NA+,I NA+	L:t	0.25	14.07	-0.12	14.07	0.01	0.21	0.00
NESC 250C EXTREME WIND, NA+,I NA+	R:t	0.24	14.05	-0.24	14.05	0.01	0.33	0.00
NESC 250C EXTREME WIND, NA-,I NA-	L:t	0.24	-14.05	-0.24	14.05	0.01	-0.33	-0.00
NESC 250C EXTREME WIND, NA-,I NA-	R:t	0.25	-14.07	-0.12	14.07	0.01	-0.21	-0.00
NESC 250D ICE W/ WIND, NA+,I NA+	L:t	0.25	3.58	-0.03	3.59	0.01	-0.01	0.00
NESC 250D ICE W/ WIND, NA+,I NA+	R:t	0.24	3.56	-0.06	3.57	0.01	0.14	0.00
NESC 250D ICE W/ WIND, NA-,I NA-	L:t	0.24	-3.56	-0.06	3.57	0.01	-0.14	-0.00
NESC 250D ICE W/ WIND, NA-,I NA-	R:t	0.25	-3.58	-0.03	3.59	0.01	0.01	-0.00
HEAVY ICE,I NA+	L:t	0.48	0.03	-0.06	0.49	0.03	-0.18	0.00
HEAVY ICE,I NA+	R:t	0.48	-0.01	-0.06	0.49	0.03	0.18	-0.00
UPLIFT,I NA+	L:t	0.34	0.02	-0.03	0.34	0.02	-0.05	0.00
UPLIFT,I NA+	R:t	0.34	0.01	-0.03	0.34	0.02	0.05	-0.00
NESC RULE 261A (wind towards 181),I Max	L:t	-56.00	0.08	-1.39	56.02	-2.33	-0.02	-0.01
NESC RULE 261A (wind towards 181),I Max	R:t	-56.00	0.06	-1.39	56.02	-2.33	0.03	0.01
DEFLECTION, NA+,I NA+	L:t	0.23	3.51	-0.02	3.52	0.01	0.02	0.00
DEFLECTION, NA+,I NA+	R:t	0.23	3.50	-0.05	3.51	0.01	0.12	0.00
DEFLECTION, NA-,I NA-	L:t	0.23	-3.50	-0.05	3.51	0.01	-0.12	-0.00
DEFLECTION, NA-,I NA-	R:t	0.23	-3.51	-0.02	3.52	0.01	-0.02	-0.00
NO WIND, DEFLECTION,I NA+	L:t	0.34	0.02	-0.03	0.34	0.02	-0.05	0.00
NO WIND, DEFLECTION,I NA+	R:t	0.34	0.01	-0.03	0.34	0.02	0.05	-0.00
HEAVY ICE (NO OLF),I NA+	L:t	0.45	0.03	-0.06	0.46	0.03	-0.16	0.00
HEAVY ICE (NO OLF),I NA+	R:t	0.45	-0.01	-0.06	0.46	0.03	0.16	-0.00
NESC 250B HEAVY W/K, NA+,I NA+	L:t	0.31	10.55	-0.10	10.56	0.02	0.06	0.00
NESC 250B HEAVY W/K, NA+,I NA+	R:t	0.30	10.51	-0.19	10.52	0.02	0.34	0.00
NESC 250B HEAVY W/K, NA-,I NA-	L:t	0.30	-10.51	-0.19	10.52	0.02	-0.34	-0.00
NESC 250B HEAVY W/K, NA-,I NA-	R:t	0.31	-10.55	-0.10	10.56	0.02	-0.06	-0.00
NESC RULE 277 INSULATORS, NA+,I NA+	L:t	0.24	3.25	-0.02	3.26	0.01	-0.01	0.00
NESC RULE 277 INSULATORS, NA+,I NA+	R:t	0.24	3.23	-0.05	3.24	0.01	0.13	0.00
NESC RULE 277 INSULATORS, NA-,I NA-	L:t	0.24	-3.23	-0.05	3.24	0.01	-0.13	-0.00
NESC RULE 277 INSULATORS, NA-,I NA-	R:t	0.24	-3.25	-0.02	3.26	0.01	0.01	-0.00
NESC RULE 277 INSULATORS, NA-,I NA-	L:t	0.24	12.69	-0.10	12.69	0.01	0.19	0.00
NESC RULE 277 INSULATORS, NA+,I NA+ 1	R:t	0.23	12.67	-0.20	12.68	0.01	0.30	0.00
NESC RULE 277 INSULATORS, NA-,I NA- 1	L:t	0.23	-12.67	-0.20	12.68	0.01	-0.30	-0.00
NESC RULE 277 INSULATORS, NA-,I NA- 1	R:t	0.24	-12.69	-0.10	12.69	0.01	-0.19	-0.00
NESC RULE 277 INSULATORS, NA+,I NA+ 2	L:t	0.24	3.25	-0.02	3.26	0.01	-0.01	0.00
NESC RULE 277 INSULATORS, NA+,I NA+ 2	R:t	0.24	3.23	-0.05	3.24	0.01	0.13	0.00
NESC RULE 277 INSULATORS, NA-,I NA- 2	L:t	0.24	-3.23	-0.05	3.24	0.01	-0.13	-0.00
NESC RULE 277 INSULATORS, NA-,I NA- 2	R:t	0.24	-3.25	-0.02	3.26	0.01	0.01	-0.00
NESC 250B HEAVY NO OLF W/K, NA+,I NA+	L:t	0.26	4.16	-0.03	4.17	0.01	-0.01	0.00
NESC 250B HEAVY NO OLF W/K, NA+,I NA+	R:t	0.25	4.14	-0.07	4.15	0.01	0.17	0.00
NESC 250B HEAVY NO OLF W/K, NA-,I NA-	L:t	0.25	-4.14	-0.07	4.15	0.01	-0.17	-0.00
NESC 250B HEAVY NO OLF W/K, NA-,I NA-	R:t	0.26	-4.16	-0.03	4.17	0.01	0.01	-0.00

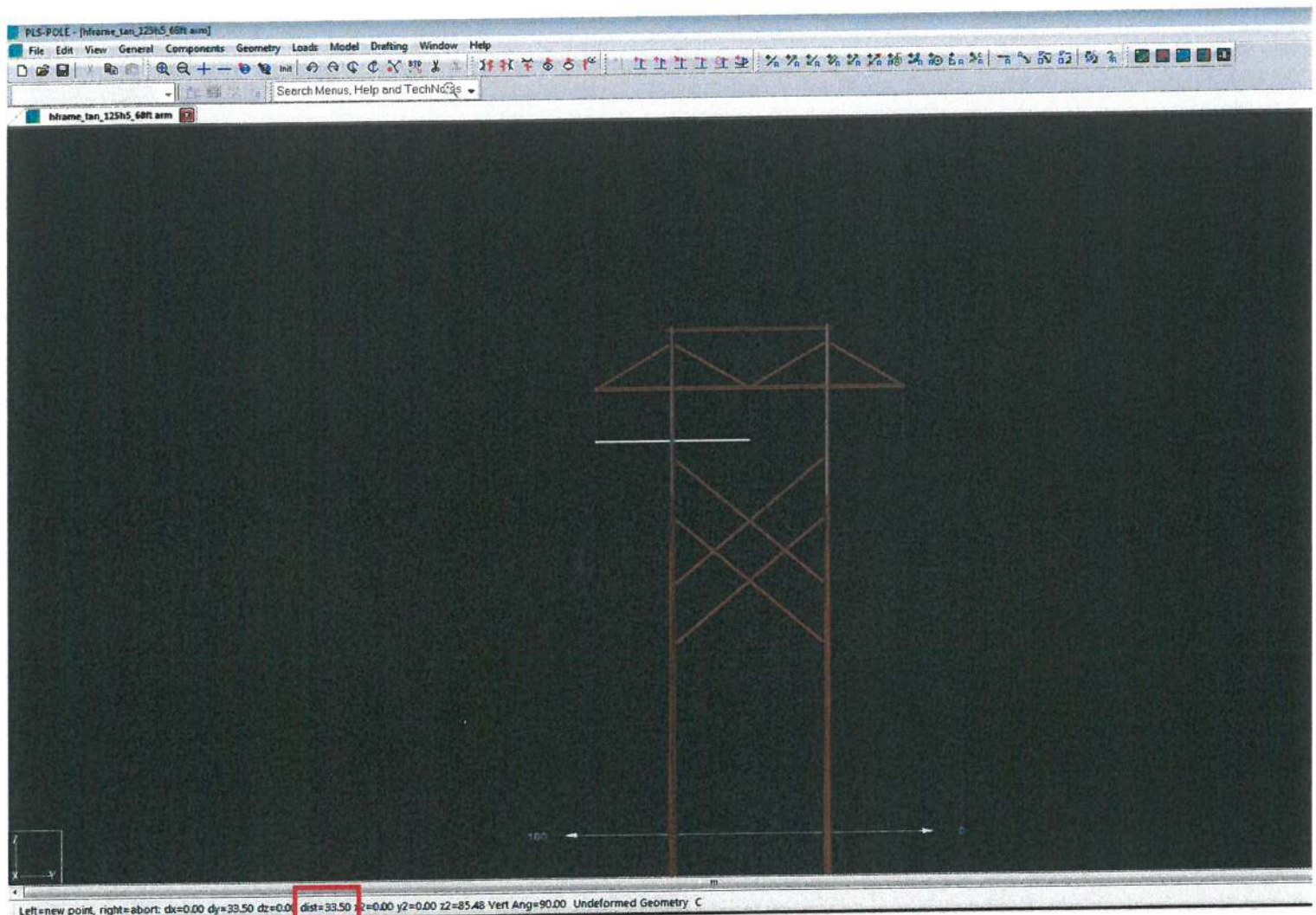
JOSHUA E. POTTS  
NEW MEXICO  
23051  
LICENSED PROFESSIONAL ENGINEER  
*Josh Potts*  
5-17-2018



The image below is a screen shot of the cross sectional view of the structure. The insulator swing shown is at the 100 MPH Wind load case. The horizontal distance of the insulator swing (9.43 ft) is shown in the red box in the image:



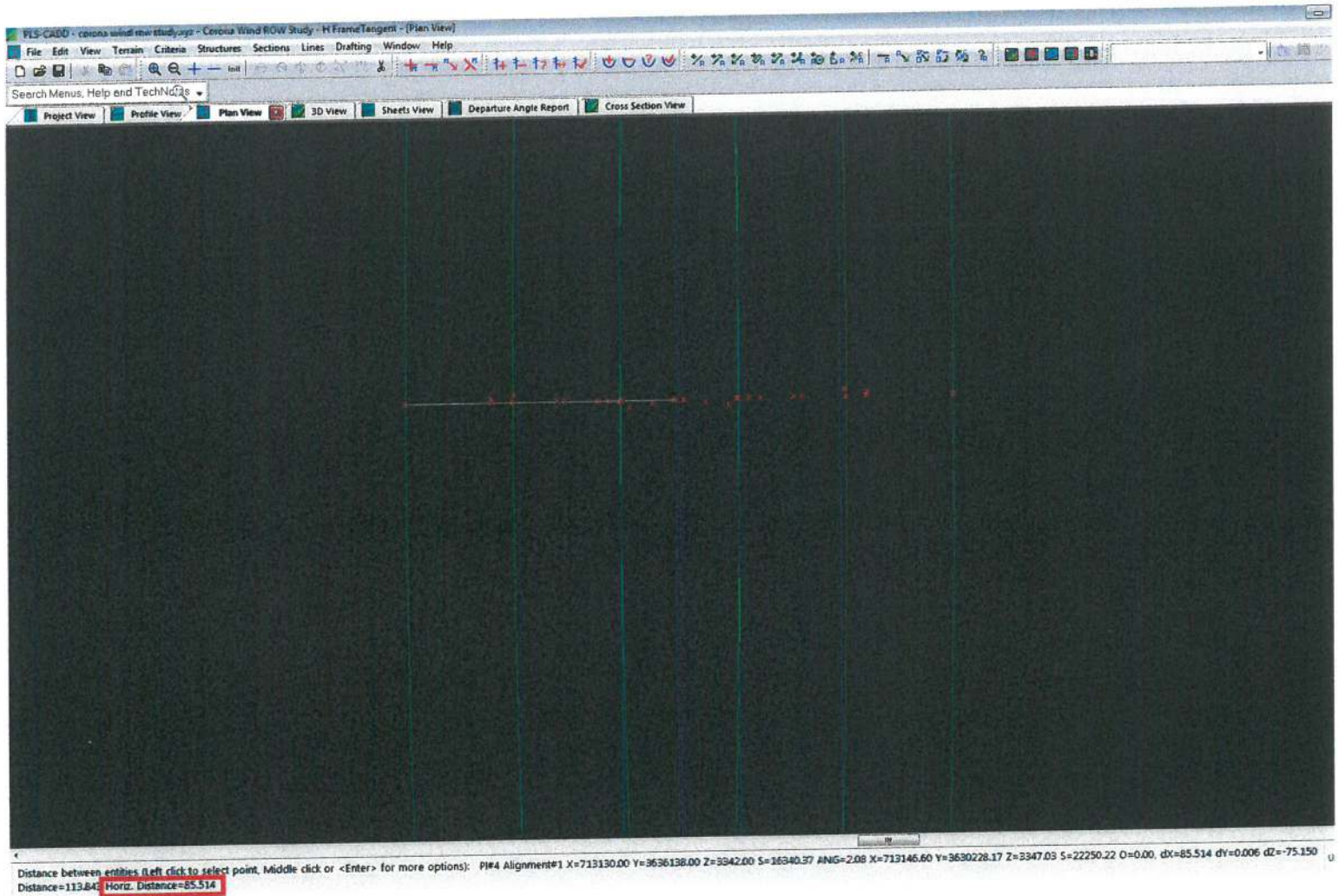
The image below shows the measurement of the outer phase attachment point to the center of the structure (33.5 ft):



*Josh Potts*  
5-17-2018



The image below shows the measurement of the total conductor blowout from the center line of the alignment. The distance shown below includes insulator swing, structure deflection and the offset of the outer phase from the center.



The conductor blowout can be calculated by subtracting the structure deflection, horizontal insulator swing length, and attachment point offset from the total blowout value shown above.

$(B_c)$  = Conductor Blowout (ft)

$(D_s)$  = Structure Deflection (ft)

$(D_i)$  = Insulator Swing Horizontal Distance (ft)

$(D_o)$  = Outer Phase Attachment Offset From Structure Center (ft)

$(B_T)$  = Total Blowout

$$\begin{aligned} B_c &= B_T - D_s - D_i - D_o \\ &= 85.5 \text{ ft} - 1.17 \text{ ft} - 9.34 \text{ ft} - 33.5 \text{ ft} \\ &= 41.49 \text{ ft} \end{aligned}$$



*Josh Potts*  
5-17-2018

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

IN THE MATTER OF THE CORONA WIND )  
COMPANIES' JOINT APPLICATION FOR THE )  
LOCATION OF THE CORONA WIND PROJECTS )  
AND THE CORONA GEN-TIE SYSTEM IN )  
LINCOLN, TORRANCE AND GUADALUPE )  
COUNTIES PURSUANT TO THE PUBLIC UTILITY )  
ACT, NMSA 1978, §62-9-3 )

Case No. 18-00065-UT

ANCHO WIND LLC, COWBOY MESA LLC, DURAN )  
MESA LLC, RED CLOUD WIND LLC, TECOLOTE )  
WIND LLC, VIENTO LOCO LLC, )

FILED IN OFFICE OF

MAY 18 2018

JOINT APPLICANTS. )

NM PUBLIC REGULATION COMM  
RECORDS MANAGEMENT BUREAU

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the *Supplemental Testimony of Greg Parent* was sent on this 18th day of May 2018 by electronic mail and/or by first class postage pre-paid mail and hand delivery to the companies and individuals listed below:

**Via Email:**

Cydney Beadles  
Milo Chavez  
Jack Sidler  
John Reynolds  
John Bogatko  
Dhiraj Solomon  
Travis Blecha  
Michael C. Smith  
Joseph Yar  
Ward Marshall  
Adam Cernea Clark  
Crystal Coffman  
Alicia Armijo  
Greg Ridgley-OSE  
Michaelene Kyrala-NMENV  
Lisa Henne-SLO  
Craig Johnson  
Daniel A. Najjar  
Carla R. Najjar  
Belinda Garland (Torrance County)  
Leann Weibrecht (Town of Carrizozo)  
Michelle Jones (Town of Estancia)  
Nita Taylor (Lincoln County Manager)  
Yolanda M. Garcia (City of Santa Rosa)

Cydney.beadles@state.nm.us;  
milo.chavez@state.nm.us;  
Jack.sidler@state.nm.us;  
john.reynolds@state.nm.us;  
John.bogatko@state.nm.us;  
Dhiraj.solomon@state.nm.us;  
Travis.blecha@state.nm.us;  
Michaelc.smith@state.nm.us;  
Jyar@nmag.gov;  
ward.marshall@patternenergy.com  
adam.cerneaclark@patternenergy.com;  
crystal.coffman@patternenergy.com  
Aarmijo@nmag.gov  
Greg.Ridgley@state.nm.us  
Michaelene.Kyrala@state.nm.us  
lhenne@slo.state.nm.us  
Cjohnson@slo.state.nm.us  
dnajjar@virtuelaw.com  
csnajjar@virtuelaw.com  
bgarland@tcnm.us  
zozocityhall@tularosa.net  
mjones@townofestancia.com  
Ntaylor@lincolncountynm.gov  
Ygarcia@srm.org



Angela Creamer (Head Librarian Estancia)  
Terri Racher (Clerk Village of Corona)  
Irma Devine (Ruidoso Municipal Clerk)  
Carol Virden (Clerk Ruidoso Downs)  
Loretta Chavez (Clerk Village of Encino)  
Sheila Larranga-Murphy (Clerk Moriarty)  
Dennis Fulfer (Clerk Town of Mountainair)

estanciapbplib@townofestancia.com  
villageofcorona@plateautel.net  
IrmaDevine@ruidosodowns.us  
cvirden@ruidosodowns.us  
oakvillage@plateautel.net  
clerk@moriartynm.gov  
townclerk@mountainairnm.gov

**Via Hand Delivery:**

John Bogatko  
NMPRC  
1120 Paseo de Peralta  
Santa Fe, New Mexico 87504

**Via US Mail**

Town of Carrizozo  
c/o Leann Weibrecht - Clerk-Treasurer  
400 9<sup>th</sup> St.  
P.O. Box 247  
Carrizozo, NM 88301-0247

City of Santa Rosa  
c/o Yolanda M. Garcia - City Clerk  
244 S 4<sup>th</sup> St.  
PO Box 429  
Santa Rosa, NM 88435-0429

Town of Estancia, Public Library  
c/o Angela Creamer - Head Librarian  
601 South Tenth Street  
PO Box 166 Estancia, NM 87016

Lincoln County  
c/o Nita Taylor, County Manager  
300 Central Avenue  
Carrizozo, NM 88301

Guadalupe County  
c/o George Dodge, Jr., County Manager  
130 S. 4th Street  
Santa Rosa, NM 88435

Village of Corona  
c/o Terri Racher - Village Clerk-Treasurer  
461 Corona Main St.  
P.O. Box 37  
Corona, NM 88318-0037

Town of Estancia  
c/o Michelle Jones – Clerk  
513 Williams Ave  
P.O. Box 166  
Estancia, NM 87016-0166

Town of Carrizozo, Public Library  
c/o Head Librarian  
406 Central Avenue (Hwy 54)  
Carrizozo, NM 88301

Moise Memorial Library  
c/o Mary Martinez - Library Director  
208 S. 5th St.  
Santa Rosa, NM 88435

Torrance County  
c/o Belinda Garland, County Manager  
205 9<sup>th</sup> Street  
Estancia, NM 87016

Village of Capitan  
c/o Laura McInnes - Clerk-Treasurer  
114 Lincoln Ave.  
P.O. Box 1380,  
Capitan, NM 88316

Village of Ruidoso  
c/o Irma Devine - Village Clerk  
313 Cree Meadows Dr.  
Ruidoso, NM 88345



City of Ruidoso Downs  
c/o Carol Virden -Clerk-Treasurer  
123 Downs Drive  
P.O. Box 348  
Ruidoso Downs, NM 88346

City of Moriarty  
c/o Sheila Larranaga-Murphy - Clerk  
201 Broadway Street  
P.O. Box 130  
Moriarty, NM 87035

Village of Willard  
c/o Angela Halbert – Clerk/Treasurer  
720 N Dunlavy St  
PO Box 204  
Willard, NM 87063

Village of Encino  
c/o Loretta Chavez - Clerk-Treasurer  
427A N Main  
P.O. Box 163  
Encino, NM 88321-0163

Town of Mountainair  
c/o Dennis Fulfer - Town Clerk  
105 E Broadway  
PO Box 115  
Mountainair, New Mexico 87036

Town of Vaughn  
c/o Fronia Jaramillo – Clerk  
322 8th St  
P.O. Box 278  
Vaughn, NM 88353-0278

**DATED** this 18th day of May 2018.

Sincerely,

VIRTUE & NAJJAR, PC

  
Daniel A. Najjar  
Carla R. Najjar  
2200 Brothers Road  
P.O. Box 22249  
Santa Fe, NM 87502-2249  
(505) 983-6101  
dnajjar@virtuelaw.com  
csnajjar@virtuelaw.com

*Attorneys for the Corona Wind Companies*