Case No. 18

DIRECT TESTIMONY OF

DEREK PRICE

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) Across IT
LINCOLN, TORRANCE AND GUADALUPE) Case No. 18- <u>DODUS-UT</u>
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.)
	,

DIRECT TESTIMONY OF

DEREK PRICE

ON BEHALF OF THE CORONA WIND COMPANIES

1 I. WITNESS INTRODUCTION AND QUALIFICATIONS

- 2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- 3 A. My name is Derek Price. My business address is 4225 Executive Sq., Ste. 260; La Jolla,
- 4 CA 92037.
- 5 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?
- 6 A. I am employed by Pattern Energy Group, LP (together with Pattern Energy Group 2 LP,
- 7 "Pattern Development"). I hold the position of Senior Pre-Construction Manager. I serve
- 8 as the Engineering Manager for Transmission and provide technical support for routing
- and permitting the 345-kilovolt ("kV") transmission system and associated transmission
- facilities, including the 180-foot right of way ("ROW") located within a 1-mile-wide
- 11 corridor ("Corona Gen-Tie System" or the "Gen-Tie System"). The Gen-Tie System is
- being built in association with proposed 2200 megawatt ("MW") of wind generation under
- development by Pattern Development in Guadalupe, Lincoln, and Torrance Counties
- 14 ("Corona Wind Projects"). This work was performed in support of the application for
- location control approval before the New Mexico Public Regulation Commission
- 16 ("Commission") pursuant to NMSA 1978, §§62-9-3, 62-9-3.2 and Commission Rule
- 17 17.9.592 NMAC.
- 18 Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND WORK BACKGROUND.
- 19 A. I have a Bachelor of Science in Construction Management from Minnesota State
- University. I have worked in the renewable energy industry since 2008 leading
- engineering, procurement, and construction of wind and transmission projects. In those

1		years, I worked as a field engineer, project engineer, construction manager, and project
2		manager.
3	Q.	DO YOU HOLD ANY PROFESSIONAL LICENSES?
4	A.	No.
5	Q.	ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?
6	A.	I am testifying on behalf of the joint applicants, Ancho Wind LLC, Cowboy Mesa LLC,
7		Duran Mesa LLC, Red Cloud Wind LLC, Tecolote Wind LLC, and Viento Loco LLC,
8		(collectively the "Corona Wind Companies" or the "Joint Applicants").
9	Q.	HAVE YOU PREVIOUSLY TESTIFIED IN ANY ADMINISTRATIVE OR JUDICIAL PROCEEDING?
10	A.	No.
11	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY.
12	A.	My testimony provides an overview of the technical aspects of the Gen-Tie System and the
13		need for a ROW width of 180 feet.
14	Q.	PLEASE PROVIDE A SUMMARY OF YOUR TESTIMONY.
15	A.	I will describe the technical aspects of the Corona Gen-Tie System, including substations,
16		the proposed structure configurations, typical structure heights, typical span lengths and
17		required equipment as well as the anticipated level of ground disturbance. I will also
18		address the need for a 180-foot ROW width which ensures the Gen-Tie System meets all
19		National Electrical Safety Codes ("NESC"), minimizes landowner impact, ensures
20		adequate space for construction workers and equipment, and allows for flexibility during
21		the detailed design phase.

TECHNICAL ASPECTS OF THE CORONA GEN-TIE SYSTEM II. 1

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- PLEASE DESCRIBE THE CORONA GEN-TIE SYSTEMIN GENERAL TERMS. 2 Q.
- The Gen-Tie System will include above-ground single-circuit and double-circuit 345-kV A. high-voltage transmission lines, substations and switchyards. The substations and switchyards are located and optimized in such a manner to accommodate a large subset group of wind turbines to maximize design efficiency and minimize unnecessary underground and above ground electrical infrastructure. The Corona Gen-Tie System will consist of approximately 80 miles of high-voltage transmission lines that act as a collector system in between each of the proposed seven 345-kV substations of the Corona Wind Projects. This collector system will transmit the electricity generated by the wind turbines 10 to the 345-kV substations. Then, the electricity located in the 345-kV substations will be transmitted via the high-voltage transmission lines to the Eastern terminus of one of SunZia 12 Transmission LLC's 500-kV step-up substations ("SunZia Project"). The Eastern terminus 13 of the SunZia Project ("SunZia East") represents the point of interconnection for the 14 Corona Gen-Tie System and the Corona Wind Projects. Steel monopoles or wooden h-15 frames are expected to be the primary transmission line structures utilized to support the 16 transmission line conductors and overhead optical ground wire ("OPGW"). Typical 17 structure configurations are provided in Exhibit DP-1. 18
- DOES THE CORONA GEN-TIE SYSTEM INCLUDE AN ELECTRIC GENERATING PLANT? 19 Q.
- No. The Corona Wind Projects are separate from the Gen-Tie System. 20 A.

1	Q.	PLEASE DESCRIBE THE TRANSMISSION LINES THAT WILL COMPRISE THE CORONA GEN-
2		TIE SYSTEM.
3	A.	As previously mentioned, the Corona Gen-Tie System will transfer the energy generated
4		by the Corona Wind Projects (up to 2200 MW) to the SunZia Project, a 515-mile-long
5		transmission corridor with possible configurations of two 500-kV alternative current
6		transmission ("AC") lines, or one AC and one direct current 500-kV line in New Mexico
7		and Arizona. There will be approximately 80 miles (427,680 feet) of high-voltage
8		transmission lines that will transfer the electricity generated by the Corona Wind Projects
9		to the 345-kV substations and then, to the 500- kV step-up substation adjacent to SunZia
10		East. See Exhibit DP-2 for substation general arrangements and Exhibit DP-3 for
11		substation one-line diagrams.
12	Q.	PLEASE DESCRIBE THE TRANSMISSION LINE STRUCTURES THAT WILL BE USED.
12 13	Q. A.	PLEASE DESCRIBE THE TRANSMISSION LINE STRUCTURES THAT WILL BE USED. It is anticipated that the primary structure will be steel monopole used to support the
13		It is anticipated that the primary structure will be steel monopole used to support the
13 14		It is anticipated that the primary structure will be steel monopole used to support the transmission line conductor and the OPGW. It is also expected that the conductor will be
13 14 15		It is anticipated that the primary structure will be steel monopole used to support the transmission line conductor and the OPGW. It is also expected that the conductor will be Aluminum Conductor Steel-Reinforced. However, given the uncertain availability of
13141516		It is anticipated that the primary structure will be steel monopole used to support the transmission line conductor and the OPGW. It is also expected that the conductor will be Aluminum Conductor Steel-Reinforced. However, given the uncertain availability of resources during the time of the Gen-Tie System, the Gen-Tie System keeps flexibility in
1314151617		It is anticipated that the primary structure will be steel monopole used to support the transmission line conductor and the OPGW. It is also expected that the conductor will be Aluminum Conductor Steel-Reinforced. However, given the uncertain availability of resources during the time of the Gen-Tie System, the Gen-Tie System keeps flexibility in case one of the primary materials for construction is not economically viable or readily
13 14 15 16 17 18	A.	It is anticipated that the primary structure will be steel monopole used to support the transmission line conductor and the OPGW. It is also expected that the conductor will be Aluminum Conductor Steel-Reinforced. However, given the uncertain availability of resources during the time of the Gen-Tie System, the Gen-Tie System keeps flexibility in case one of the primary materials for construction is not economically viable or readily available.
13 14 15 16 17 18	A.	It is anticipated that the primary structure will be steel monopole used to support the transmission line conductor and the OPGW. It is also expected that the conductor will be Aluminum Conductor Steel-Reinforced. However, given the uncertain availability of resources during the time of the Gen-Tie System, the Gen-Tie System keeps flexibility in case one of the primary materials for construction is not economically viable or readily available. Why were the steel monopoles or wooden h-frames chosen for the Corona

1		Corona Gen-Tie System. They also have a shorter procurement timeframe and have a
2		proven history of being reliable and safe to build and operate.
3	Q.	PLEASE DESCRIBE THE DISTANCE BETWEEN STRUCTURES THAT WILL BE USED IN THE
4		CORONA GEN-TIE SYSTEM.
5	A.	The anticipated distance between each structure will vary depending on structure type,
6		conductor, configuration, terrain, avoidance of sensitive areas, existing infrastructure, and
7		landowner preferences, just to name a few. It is anticipated that the average ruling span
8		between each structure will be between 500 and 1,000 feet. For example, flat ground with
9		no extreme turns will result in span lengths generally around 800 to 1,000 feet.
10	Q.	PLEASE DESCRIBE THE INTERCONNECTION FACILITIES.
11	A.	The interconnection facilities proposed for the Corona Gen-Tie System will consist of
12		approximately seven 34.5/345-kV step-up substations, approximately 80 miles of single-
13		circuit and double-circuit 345-kV and 500-kV transmission lines, and one 345/500-kV
14		step-up substation. The substations will also include main-power transformers, breakers,
15		control buildings, and other miscellaneous voltage support equipment necessary for the
16		operation and maintenance of the facilities. See Exhibit DP-2.
17	Q.	HOW WILL THE GEN-TIE SYSTEM INTERCONNECT WITH THE CORONA WIND PROJECTS?
18	A.	Exhibit DP-4 shows a schematic diagram showing how the Corona Gen-Tie System will
19		interconnect with the Corona Wind Projects.
20	Q.	WHERE WILL THE TRANSMISSION LINES BE LOCATED?
21	A.	The transmission lines will be located in Lincoln, Torrance, and Guadalupe Counties in
22		New Mexico. See the Direct Testimony of Adam Cernea Clark and the corresponding

exhibit for a map showing approximately where the transmission lines will be located.

2	III.	ROW WIDTH EVALUATION
3	Q.	PLEASE EXPLAIN THE PURPOSE OF YOUR ROW WIDTH EVALUATION?
4	A.	The purpose of the ROW width evaluation was to determine the range of ROW widths that
5		would ensure safety, minimize landowner impact, provide adequate space in which to
6		work, and allow flexibility during detailed design of the 345-kV transmission lines
7		proposed by the Gen-Tie System. The NESC and standard industry practice were also used
8		as the basis for determining the necessary ROW width.
9	Q.	How is the ROW width determined?
10	A.	The ROW for an electric transmission line is the corridor under and to either side of the
11		transmission line needed to build, maintain, and operate the line. In general, the width
12		required for an electric high voltage transmission line is access for construction, operations,
13		and maintenance and NESC compliance.
14	Q.	HAVE THE JOINT APPLICANTS DETERMINED THE ROW WIDTH REQUIRED FOR THE
15		PROPOSED GEN-TIE SYSTEM?
16	A.	Yes. The Corona Gen-Tie System will require a 180-foot ROW width.
17	Q.	ARE YOU AWARE OF THE NEW MEXICO STATUTORY REQUIREMENTS REGARDING ROW
18		WIDTH IN RELATION THE A 345-KV TRANSMISSION LINE?
19	A.	My understanding is that under NMSA 1987, §62-9-3.2 no person or entity can begin
20		construction of a transmission line that requires a ROW width greater than 100 feet without
21		first obtaining approval by the Commission, unless the parties agree otherwise.

1 Q. WHY DOES THE GEN-TIE SYSTEM REQUIRE A 180-FOOT ROW WIDTH?

As mentioned above, a nominal 180-foot ROW width, 90 feet on either side of construction is necessary to ensure compliance with NESC, provide adequate space for construction, and for the operations and maintenance of the transmission line. A 180-foot ROW width also allows for project flexibility in span lengths to reduce impacts to private landowners and sensitive resources. As the span length increases, the ROW width also needs to increase to compensate for increased conductor blowout. There are areas where a 180-foot ROW width may not be necessary depending on structure type and site terrain.

9 Q. PLEASE EXPLAIN THE BASIC DESIGN CONDITIONS YOU EVALUATED.

A.

Preliminary design considerations include geotechnical soils studies, topographical surveys, and annual wind and weather conditions to determine a range of preliminary specifications for equipment and infrastructure for the proposed location of the transmission and interconnection facilities. The primary conditions studied for conductor loading was in compliance with local utilities, NESC and the Associated Criteria for Buildings and other Structures ("ASCE"). Under conditions in NESC ASCE 7, we analyze a maximum wind gust of 100mph (160km/hr) at 60 degrees Fahrenheit (15 degrees Celsius) at a horizontal wind pressure (lb/ft2) of 4 lb/ft2. We also evaluate the loading criterial for a ½ inch of radial ice around the conductor since we are located in NESC Zone 1. Under these conditions, and the aforementioned considerations, we evaluate the clearances, conductor movement, and structure deflection to calculate span lengths and structure types and configurations.

1	Q.	HOW DO SPAN LENGTH AND STRUCTURE CONFIGURATION AFFECT ROW WIDTH?
2	A.	Structure height, configuration, and spacing determine transmission line ROW width.
3		Longer span lengths and higher structures result in an increase of conductor movement
4		which requires additional ROW width.
5	Q.	How will a 180-foot ROW width minimize landowner impact?
6	A.	A 180-foot ROW width allows for greater flexibility in transmission line design, such as
7		longer span lengths, to reduce the number of structures required per mile of line. Narrower
8		ROW width reduces design efficiency and would require structures that are closer together
9		to keep the conductor movement within the designated ROW. Longer spans reduce
10		structure inference with farming, grazing, or any other future use of the landowners'
11		property. Longer spans also reduce visual impact due to less structures and thus
12		minimizing the appearance of a 'picket fence'.
13	Q.	DID YOU TAKE OTHER CONSIDERATIONS INTO ACCOUNT?
14	A.	Yes, other considerations where taken into account such as constructability, operations and
15		maintenance of the line. Visual and noise impacts also affect ROW width. These
16		considerations also consider NESC, prudent industry standards and best practices.
17	Q.	HOW DO CONSTRUCTION, OPERATIONS AND MAINTENANCE AFFECT THE NECESSARY
18		ROW WIDTH?
19	A.	The ROW width must be large enough to move equipment along the transmission corridor.
20		Large cranes used to erect the transmission structures are typically the controlling factor.
21		In this case we determined 90 feet from the centerline of the structure (total of 180 feet) is
22		the minimum for access and operations purposes. Considering the level terrain of the

1	transmission corridor, we did not identify any extraordinary issues for construction,
2	maintenance, or operations. However, the Joint Applicants request the Commission 90
3	feet on either side of the structure—a total of 180 feet—to further ensure safety, have
4	minimize landowner impact, allow for enough flexibility to design the transmission lines
5	and provide adequate space to work.

6 Q. WERE THERE ANY OTHER IMPORTANT CONSIDERATIONS?

- 7 A. Yes. We analyzed setback distances from public roads, proposed wind turbine locations,
- 8 and worked with landowners to ensure proper alignment and setback distances from any
- 9 existing infrastructure.

10 IV. <u>Conclusion</u>

11 Q. PLEASE SUMMARIZE YOUR CONCLUSION.

- The Corona Gen-Tie System will transmit the electricity generated by the Corona Wind 12 A. Projects to the generation substations and ultimately to the SunZia Project. The high-13 voltage transmission lines and substations will be built to maximize design efficiency and 14 minimize unnecessary underground and above ground electrical infrastructure. A 180-foot 15 ROW width is necessary for the Corona Gen-Tie System since this range will provide 16 sufficient ROW width for variations in design while addressing electrical safety code 17 requirements, construction and operational considerations according to industry standard 18 practice. 19
- 20 Q. Does this include your testimony?
- 21 A. Yes, it does.

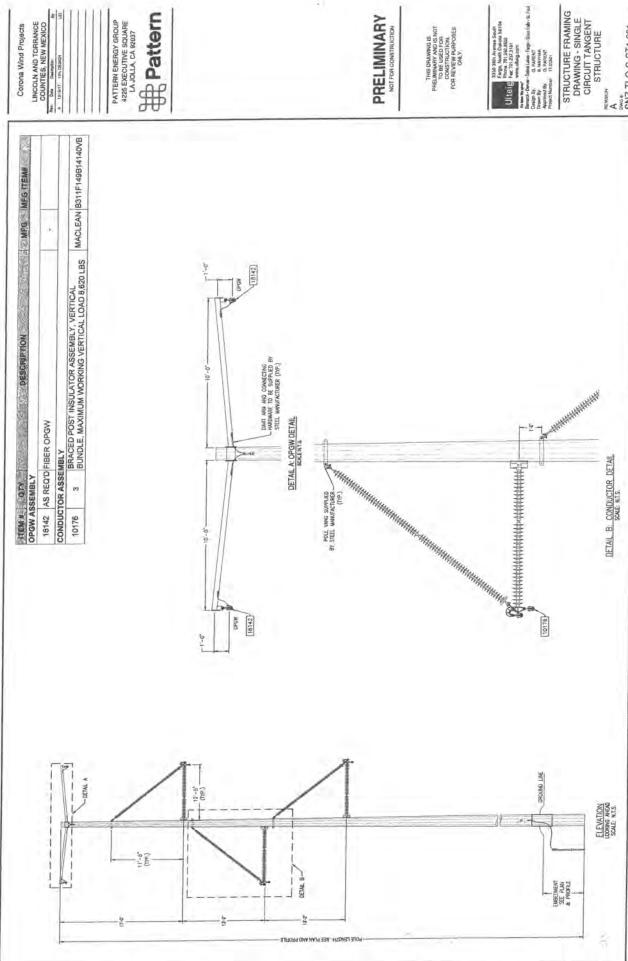
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EXHIBIT DP-1

STRUCTURE
A STRUCTURE
SMZ-TLO-C-ST1-001

Exhibit DP-1

Page 1 of 4



STRUCTURE FRAMING
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Exhibit DP-1 Page 2 of 4

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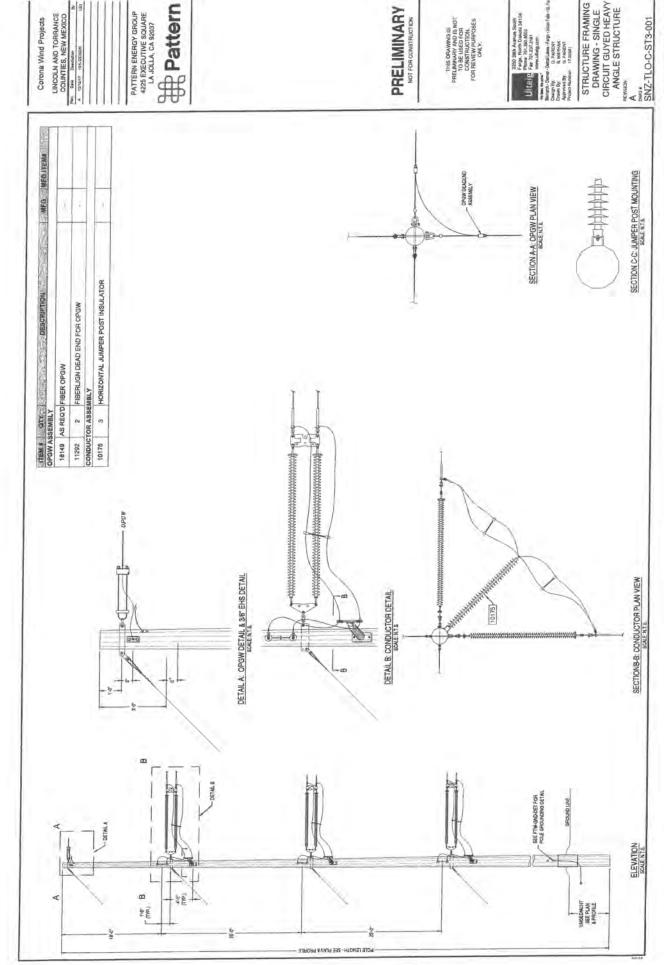


Exhibit DP-1 Page 4 of 4

IN THE MATTER OF THE CORONA WIND	
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EXHIBIT DP-2

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Exhibit DP-2 Page 1 of 5

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Corona Wind Projects

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Exhibit DP-2 Page 4 of 5

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Exhibit DP-2 Page 5 of 5

IN THE MATTER OF THE CORONA WIND	
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EXHIBIT DP-3

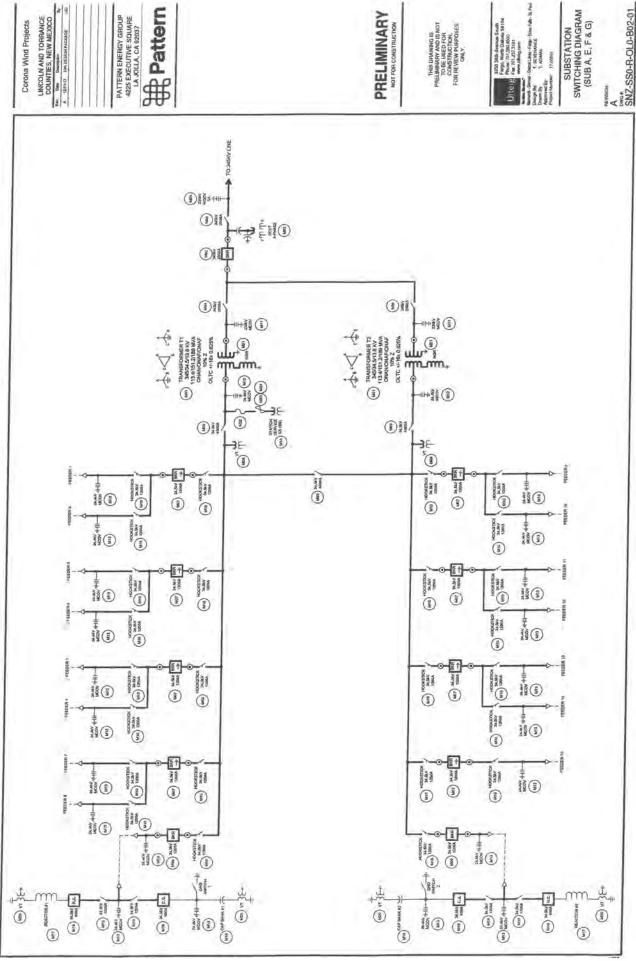


Exhibit DP-3

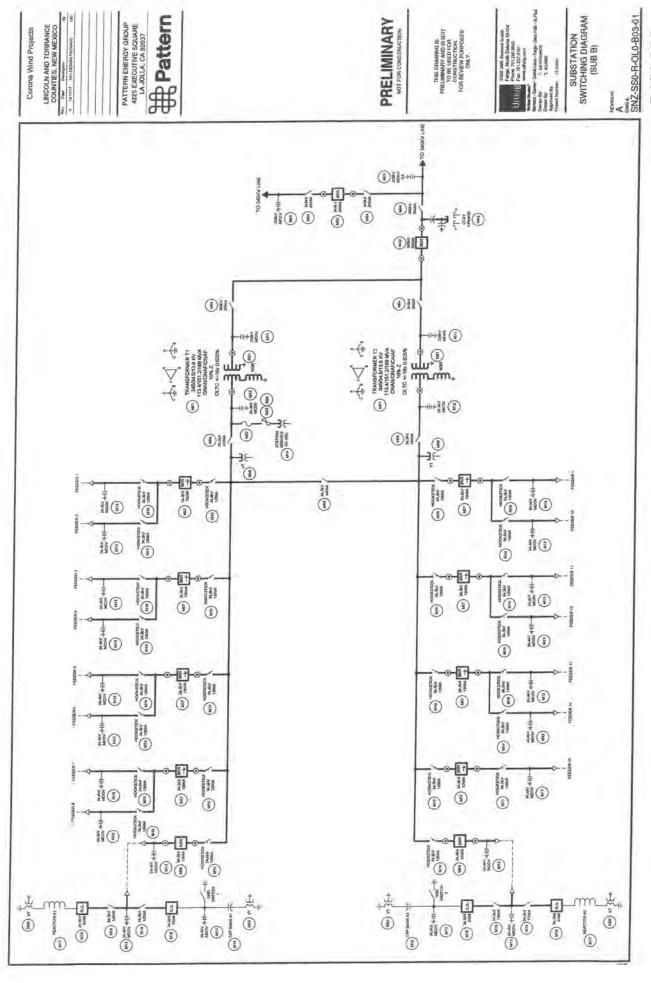


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Exhibit DP-3 Page 3 of 5

Exhibit DP-3
Page 4 of 5

Exhibit DP-3 Page 5 of 5

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EXHIBIT DP-4

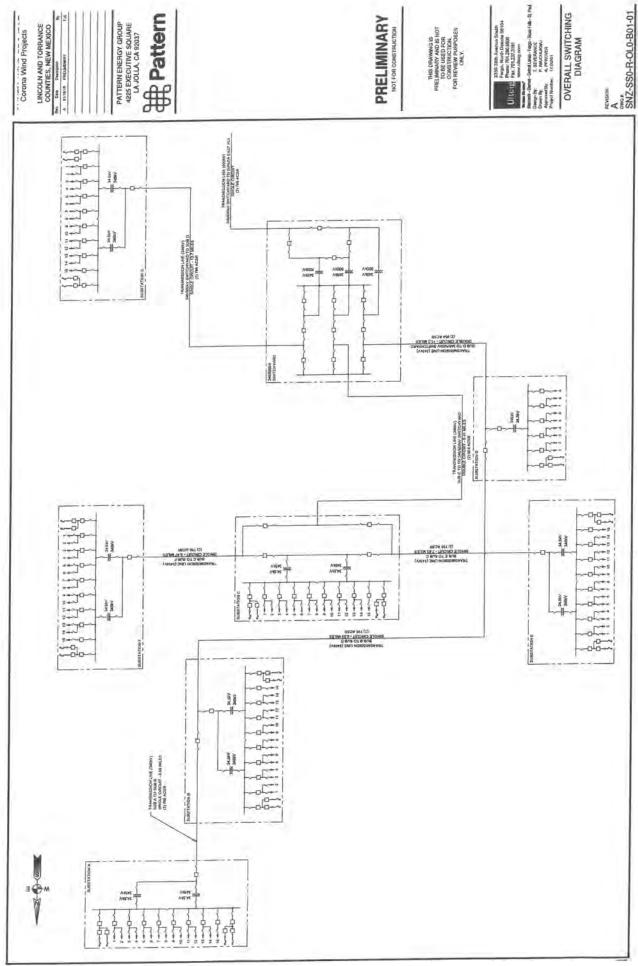


Exhibit DP-4

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AFFIDAVIT OF DEREK PRICE

IN THE MATTER OF CORONA WIND COMPANIES' JOINT APPLICATION FOR THE LOCATION OF THE CORONA WIND PROJECTS AND CORONA GEN-TIE SYSTEM 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. 18UT))))))))))))))))
AFFIDAVIT OF DI	EREK PRICE
STATE OF CALIFORNIA) ss. COUNTY OF San Diego I have read the foregoing Direct Testimony,	and it is true and accurate based on my own
knowledge and belief.	D-0.R.
SUBSCRIBED and sworn to before me this 12 da	ay of March 2018. Camba for Mets NOTARY PUBLIC
May 19, 2019 My Commission Expires	PAMELA KIEFER METZ Commission # 2112324 Notary Public - California San Diego County My Oomm. Expires May 19, 2019