

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE JOINT APPLICATION)
FOR THE LOCATION APPROVAL OF THE)
CORONA WIND NORTH PROJECT AND)
FOR THE RIGHT-OF-WAY WIDTH APPROVAL)
PURSUANT TO THE PUBLIC UTILITY ACT,)
NMSA 1978, §62-9- 3)
)
)
**DAHLIA WIND LLC, GALLINAS MOUNTAIN)
WIND LLC, PASTURA WIND LLC, AND PATTERN)
SC HOLDINGS LLC,)
)
)
)
**JOINT APPLICANTS.)
)******

Case No. 22-000___-UT

DIRECT TESTIMONY OF CRYSTAL COFFMAN

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Crystal Coffman. My business address is 1201 Louisiana St. Suite 3200
4 Houston, Texas.

5 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

6 A. I am employed by Pattern Energy Group LP (together with Pattern Energy Group 2 LP,
7 ("Pattern Energy") as the Execution Director, Business Development.

8 **Q. PLEASE DESCRIBE YOUR EDUCATION BACKGROUND AND EXPERIENCE.**

9 A. I have a Bachelor of Science degree in both Architecture and Civil Engineering from Texas
10 Tech University and a Master of Business Administration degree from Rice University. I
11 have worked in the renewables industry for Pattern Energy or its predecessor, Babcock &
12 Brown, since 2007 and have experience in both Project Finance and Development. I played
13 a direct role in the financing and development of over 2,800 megawatts ("MW") of wind
14 farms in operation to date.

15 **Q. PLEASE DESCRIBE THE DUTIES AND RESPONSIBILITIES FOR YOUR
16 CURRENT POSITION.**

17 A. As Execution Director, Business Development, my duties include the following:

18 • Ensuring timely decisions are made in collaboration with other stakeholders of the
19 development.

20 • Regularly reviewing the risks, schedule, and budget progress of Pattern projects.

- 1 • Supporting Project Developers in Corporate Approval Process to ensure Project
2 conformity to Pattern Values.

3 **Q. ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

4 A. I am testifying on behalf of the Joint Applicants, Dahlia Wind LLC, El Corazon Wind LLC,
5 Gallinas Mountain Wind LLC, Pastura Wind LLC, and Pattern SC Holdings LLC
6 (collectively, the “Corona North Wind Companies” or the “Joint Applicants”) in support
7 of this Joint Application for location control approval before the New Mexico Public
8 Regulation Commission (“Commission”) pursuant to NMSA 1978, §§62-9-3, 62-9-3 and
9 Commission Rule 17.9.592 NMAC (“Joint Application”).

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

11 A. I am submitting testimony in support of this Joint Application for location approval to
12 authorize the Joint Applicants to: a) locate wind turbines and related generation facilities
13 in the area identified in Exhibit JA-1; b) locate the associated Corona Wind North Gen-Tie
14 System along the route generally identified in Exhibit JA-2 of the Joint Application; and
15 c) provide the necessary approval to the extent required by law for the right-of-way
16 (“ROW”) for the Corona Wind North Gen-Tie System. The area for wind turbines for
17 which Commission approval is sought in this Joint Application is hereafter referred to as
18 the “Corona Wind North Generation.” Collectively, I refer to the Corona Wind North
19 Generation and the Corona Wind North Gen-Tie System in my testimony (and the Joint
20 Application) as the “Corona Wind North Project”.

21 **Q. HOW IS YOUR TESTIMONY ORGANIZED?**

1 A. First, I will provide an overview of Pattern Energy and the Joint Applicants. and their
2 relationship with the 345-kilovolt (“kV”) transmission system and associated transmission
3 facilities, including a 180-foot right-of-way (“ROW”) width.

4 **Q. WHAT SUBJECTS WILL OTHER WITNESSES ADDRESS?**

5 A. The Joint Application will have the supporting testimony of the following witnesses:

- 6 • Adam Cernea Clark, Senior Environmental and Natural Resources Manager of Pattern
7 Energy, will provide more detailed testimony about the environmental values which
8 are incorporated into the planning, design, construction, and operation of our projects.
9 He will also describe the Corona Wind North Project and the Joint Applicants’
10 commitment to comply with federal, state, and local law. He provides detailed
11 testimony regarding the environmental report prepared by Burns & McDonnell
12 Engineering Company, Inc. (“Burns & McDonnell”), hereafter referred to as the
13 “Environmental Report.” His testimony will address the environmental, biological,
14 cultural, and archeological studies performed at the location of the Corona Wind North
15 Gen-Tie System. Finally, Mr. Cernea Clark will again commit the Joint Applicants to
16 comply with all the same conditions and best management practices that were advanced
17 by Pattern Energy and approved by the Commission in the Joint Applicants’ filing in
18 NMPRC Case No. 20-00008-UT.
- 19 • Greg Parent of Ulteig Engineers, Inc. will describe the technical design of the Corona
20 Wind North Gen-Tie System, including design conditions, ROW width determination,
21 structure spans and footprints, and transmission structure design.
- 22 • Jeremy Turner, Director, New Mexico Project Development of Pattern Energy will
23 testify as to the Joint Applicants’ efforts to secure all required approvals and consents

1 from local government entities and impacted landowners in connection with this
2 proceeding. He will also discuss the support that the Joint Applicants have received for
3 this project from various interest groups.

4 • Nathan Olday, the Department Manager within the Houston Environmental Services
5 Group of Burns and McDonnell, will discuss in detail the Environmental Report which
6 provides the analysis performed in connection with the Corona Wind North Project and
7 the protective measures and best management practices recommended therein.

8 **Q. HAVE YOU PREVIOUSLY TESTIFIED ANY REGULATORY AUTHORITIES**
9 **BEFORE?**

10 A. Yes. I provided testimony before the Commission in NMPRC Case No. 18-00065-UT,
11 NMPRC Case No. 20-00008-UT and NMPRC Case No. 21-00281-UT.

12 **II. OVERVIEW OF PATTERN ENERGY AND THE JOINT APPLICANTS**

13 **Q. PLEASE PROVIDE SOME BACKGROUND OF PATTERN ENERGY.**

14 A. Pattern Energy is a leading developer of renewable energy and transmission assets
15 throughout the world. With a global footprint spanning all over the United States, Canada,
16 Mexico, Chile and Japan, the highly experienced Pattern Energy team has brought more
17 than 6,000 MW of renewable power projects to market. Pattern Energy's headquarters are
18 in San Francisco, California.

19 **Q. PLEASE PROVIDE AN OVERVIEW OF THE JOINT APPLICANTS.**

20 A. The Joint Applicants are limited liability companies, organized under the laws of the State
21 of Delaware. These companies will obtain the land rights and permits needed for the
22 development and construction of the Corona Wind North Project, including the Corona

1 Wind North Gen-Tie System. An organization chart showing the relationship of the Joint
2 Applicants with Pattern Energy is attached to my testimony as Exhibit CC-1.

3 **Q. WILL PATTERN ENERGY IMPLEMENT COMPANY ENVIRONMENTAL**
4 **POLICIES OR PRACTICES REGARDING THE CORONA WIND NORTH**
5 **PROJECT?**

6 A. Yes. As discussed in more detail in the testimony of Adam Cernea Clark, Pattern Energy
7 actively participates in wind industry efforts to understand, study, and minimize the
8 environmental impacts of wind energy and to advance the development of technology and
9 best practices. Pattern Energy also routinely implements voluntary best management
10 practices (“BMPs”) and mitigation strategies that further its environmental values. In this
11 regard, Pattern Energy has included this same commitment in each filing it has made before
12 the Commission.

13 **Q. WHO WILL CONSTRUCT THE EXTENDED CORONA GEN-TIE SYSTEM?**

14 A. Construction will be managed by Pattern Energy’s in-house construction group, which has
15 successfully overseen the development of 6,262 MW of wind projects, including the Clines
16 Corners, Duran Mesa, Red Cloud Wind, and Tecolote Wind Projects (of which the latter
17 three are parts of the Corona Wind Project) near Corona, New Mexico. Construction of the
18 Corona Wind North Project will be performed under one or more balance of plant
19 agreements by one or more qualified third-party contractors.

20 **Q. WHAT COMMISSION APPROVALS ARE THE JOINT APPLICANTS**
21 **REQUESTING?**

1 A. The Joint Applicants request that the Commission approve the location of the Corona Wind
2 North Project. Joint Applicants are also requesting approval by the Commission of the
3 proposed right-of-way (“ROW”) width for the entire Corona Wind North Gen-Tie System.

4 **Q. ARE THE CORONA WIND COMPANIES REQUESTING THE COMMISSION**
5 **ISSUE A PUBLIC CERTIFICATE OF CONVENIENCE AND NECESSITY?**

6 A. No. Neither the Joint Applicants, Pattern Energy nor any affiliates of Pattern Energy are or
7 will be public utilities if the proposed location permits are granted and the Corona Wind
8 North Project and associated Corona Wind North Gen-Tie System constructed.

9 **III. THE CORONA WIND NORTH PROJECT**

10 **Q. PLEASE DESCRIBE THE CORONA WIND NORTH PROJECT.**

11 A. The Corona Wind North Project will consist of approximately 1,500 MW of wind power
12 facilities. The Corona Wind North Project will be located in Guadalupe, San Miguel and
13 Torrance Counties in New Mexico and will encompass approximately 327,895 acres of
14 private and state land within these counties. The intention remains to interconnect the
15 Corona Wind North Project to the SunZia Transmission Project (“SunZia Project”). To
16 produce the desired energy, it is anticipated that the Corona Wind North Project will consist
17 of up to 919 wind turbines with a nameplate capacity ranging from 2.6MW to 4.5MW.
18 Each of the turbines in the Corona Wind North Project will be connected by 34.5-kV
19 collection lines to new substations (“Generation Project Substations”). Exhibits JA-1, JA-
20 2, and JA-3, attached to the Joint Application provide maps showing the location of the
21 Corona Wind North Project. Of course, the proposed route for the Corona Wind North
22 Gen-Tie System is subject to change as further onsite studies are performed and more

1 information becomes available about the proposed route prior to and during the
2 construction phase. As in the past, the Commission will be notified of these changes to the
3 extent it involves movement of a turbine or segment of the Corona Wind North Gen-Tie
4 System outside of the area for which the required environmental analyses were conducted.

5 **Q. WHAT IS THE TIMEFRAME FOR THE CONSTRUCTION OF THE CORONA**
6 **WIND NORTH PROJECT?**

7 A. Construction of a portion of the Corona Wind North Project is expected to begin once all
8 the necessary permits to begin construction are in hand. The in-service date for the Corona
9 Wind North Project is by the end of 2026.

10 **IV. THE CORONA WIND NORTH CORONA GEN-TIE SYSTEM**

11 **Q. PLEASE DESCRIBE THE 2021 REVISED CORONA GEN-TIE SYSTEM.**

12 A. The Corona Wind North Gen-Tie System is a 345-kV transmission system and associated
13 transmission facilities, including a 180-foot ROW, as depicted in detail in Exhibits JA-2
14 and JA-3 to the Joint Application. The Corona Wind North Gen-Tie System will be located
15 within the Corona Wind North Project area.

16 **Q. WHAT IS THE TIMEFRAME FOR CONSTRUCTION OF THE 2021 REVISED**
17 **CORONA GEN-TIE SYSTEM?**

18 A. The Corona Wind North Gen-Tie System is expected to be in service by the end of 2026.

19 **Q. HOW WILL THE CORONA WIND NORTH GEN-TIE SYSTEM FACILITATE**
20 **THE DEVELOPMENT OF THE CORONA WIND NORTH PROJECT?**

1 A. The addition of the Corona Wind North Gen-Tie System provides an interconnection route
2 to the SunZia Transmission Project for the Corona Wind North Project.

3 **Q. ARE YOU FAMILIAR WITH THE CONDITIONS PLACED UPON THE JOINT**
4 **APPLICANTS AS PART OF THE COMMISSION'S FINAL ORDER IN NMPRC**
5 **CASE NOS. 18-00065-UT AND 20-00008-UT?**

6 A. Yes. I was intimately involved in those proceedings and agreed to those conditions at that
7 time.

8 **Q. ARE YOU AUTHORIZED TO AGREE TO THE SAME CONDITIONS AS PART**
9 **OF THIS JOINT APPLICATION AS WERE IMPOSED UPON JOINT**
10 **APPLICANTS IN THOSE PROCEEDINGS?**

11 A. Yes, I am. I do agree to the numerous conditions and environmental protections that were
12 included as conditions of the Final Order in NMPRC Case Nos. 18-00065-UT and 20-
13 00008-UT and that have been agreed to and proposed by Pattern Energy in NMPRC Case
14 No. 21-00281-UT.

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

16 A. Yes.

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RIGHT-OF-WAY WIDTH APPROVAL PURSUANT)
TO THE PUBLIC UTILITY ACT, NMSA 1978, §62-9-)
3)

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DAHLIA WIND LLC, GALLINAS MOUNTAIN)
WIND LLC, PASTURA WIND LLC, AND PATTERN)
SC HOLDINGS LLC,)

JOINT APPLICANTS.)

AFFIDAVIT OF CRYSTAL COFFMAN

STATE OF Texas)
COUNTY OF Harris) ss.

I have read the foregoing Direct Testimony and under penalty of perjury under the laws of the State of New Mexico the statements therein are true and correct based on my own knowledge and belief.

Crystal Coffman
Crystal Coffman

SWORN on this 8th day of April 2022.

Emily McClary-Davis
Notary Public

3-15-2025
My Commission Expires



