

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE JOINT APPLICATION)	
FOR THE LOCATION APPROVAL OF THE)	
EXPANDED CORONA WIND PROJECTS AND THE)	
REVISED CORONA GEN-TIE SYSTEM AND FOR)	
RIGHT-OF-WAY WIDTH APPROVAL PURSUANT)	Case No. 22-00 ____-UT
TO THE PUBLIC UTILITY ACT, NMSA 1978, §62-9-)	
3)	
)	
ANCHO WIND LLC, COWBOY MESA LLC, ,)	
GALLINAS MOUNTAIN WIND LLC, MESA)	
CANYONS WIND, LLC, PATTERN SC HOLDINGS)	
LLC, VIENTO LOCO LLC,)	
)	
)	
JOINT APPLICANTS.)	

DIRECT TESTIMONY OF JEREMY TURNER

1 **I. INTRODUCTION**

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

3 **A.** Jeremy Turner. My business address is 317 Commercial St. NE, Suite 100, Albuquerque,
4 New Mexico 87102.

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 Director, New Mexico Project Development.

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

9 **A.** I have a Bachelor of Science in Agricultural Economics/Agricultural Business and a
10 Master of Business Administration from New Mexico State University. Prior to joining
11 Pattern Energy, I served as the Chief Financial Advisor for the New Mexico Finance
12 Authority, the Executive Director for the New Mexico Renewable Energy Transmission
13 Authority and a Managing Partner for Forever Energy Consulting, LLC. Since joining the
14 New Mexico Renewable Energy Transmission Authority in 2009 and Forever Energy
15 Consulting, LLC in 2015, I have focused my career on the development of electric
16 transmission infrastructure to interconnect renewable energy to the grid. In my capacity as
17 Executive Director of the New Mexico Renewable Energy Transmission Authority, I
18 worked with the Board of Directors to issue \$50 million in bond financing for the
19 transmission line upgrade to connect the High Lonesome Mesa windfarm to the Public
20 Service Company of New Mexico transmission system. I also worked on the development
21 and original lease agreement for the Western Spirit Transmission Line. While at Forever
22 Energy Consulting, LLC I served as Project Manager for the proposed Verde Transmission
23 Project.

1 **Q. PLEASE DESCRIBE THE DUTIES AND RESPONSIBILITIES FOR YOUR**
2 **CURRENT POSITION.**

3 **A.** I serve on the Development and External Affairs teams focused on the development and
4 construction of Pattern Energy's New Mexico Projects, including the proposed 2022
5 Corona Wind Update which is the subject of this proceeding. In this capacity, I assist with
6 the coordination of activities and communication of project objectives among the Pattern
7 "teams" involved in the Corona Wind Project, including the Permitting, Land, Power
8 Marketing, Transmission, Meteorology, Engineering and Construction, Legal, Finance
9 and Accounting teams. I am responsible for ensuring and facilitating communication with
10 all the stakeholders in the development project. I am also active in negotiations with the
11 various local and state permitting agencies and landowners. Lastly, I actively engage in
12 external public affairs and community relations and serve as a public interface for Pattern
13 Energy in New Mexico.

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

15 **A.** I am testifying on behalf of Ancho Wind LLC, Cowboy Mesa LLC, Gallinas Mountain
16 Wind LLC, Mesa Canyons Wind, LLC, Pattern SC Holdings LLC, and Viento Loco LLC,
17 (collectively, the "Corona Wind Companies" or the "Joint Applicants") in support of this
18 Joint Application for location control approval before the New Mexico Public Regulation
19 Commission ("Commission") pursuant to NMSA 1978, §§62-9-3, 62-9-3.2 and
20 Commission Rule 17.9.592 NMAC ("Joint Application").

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

22 **A.** I am submitting testimony in support of this Joint Application for location approval to
23 authorize the Joint Applicants to expand the area for the wind turbines beyond that

1 previously approved by the Commission in NMPRC Case Nos. 17-00221-UT, 18-00065-
2 UT and 21-00281-UT. The expanded area for wind turbines for which Commission
3 approval is sought in this Joint Application is hereafter referred to as the “2022 Corona
4 Generation Expansion” and is more specifically described in Exhibit JA-1 attached to the
5 Joint Application. I am co-sponsoring this Exhibit JA-1.

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

7 **A.** First, I will provide an overview of Pattern Energy and the Joint Applicants. Then, I will
8 review the Joint Applicants’ currently approved wind energy facilities and the associated
9 Gen-Tie System. Collectively, the wind generation and associated Gen-Tie System and
10 facilities that were approved in the proceedings in NMPRC Case Nos. 17-00221-UT, 18-
11 00065-UT, 20-00008-UT, and 21-00281-UT, comprise the Corona Wind Project. In my
12 testimony, I discuss the reason for the changes contemplated in the 2022 Corona
13 Generation Expansion.

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

15 **A.** Adam Cernea Clark, Senior Environmental and Natural Resources Manager of Pattern
16 Development, will provide more detailed testimony about the environmental values
17 which are incorporated into the planning, design, construction, and operation of our
18 projects. He will also describe the 2022 Corona Generation Expansion and the Joint
19 Applicants’ commitment to comply with federal, state, and local law. Mr. Cernea Clark
20 will provide testimony regarding the update to the environmental report prepared by Burns
21 & McDonnell Engineering Company, Inc. (“Burns & McDonnell”) and submitted to the
22 Commission in NMPRC Case No. 20-00008-UT, hereafter referred to as the
23 “Environmental Report.” Finally, Mr. Cernea Clark will again commit the Joint

1 Applicants to comply with all the same conditions and best management practices that were
2 advanced by Pattern Energy and approved by the Commission in the Joint Applicants' last
3 filing in NMPRC Case No. 21-00281-UT.

4 Makena Caruso, Business Development Analyst of Pattern Energy will testify as to the
5 Joint Applicants' efforts to secure all required approvals and consents from local
6 government entities and impacted landowners in connection with this proceeding.

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

9 **A.** Yes. I provided testimony before the Commission in NMPRC Case Nos. 18-00065-UT, 20-
10 00008-UT, and 21-00281-UT.

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

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

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

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

19 **A.** The Joint Applicants are limited liability companies, organized under the laws of the State
20 of Delaware. These companies will obtain the land rights and permits needed for the
21 development and construction of the Corona Wind Project. An organization chart showing
22 the relationship of the Joint Applicants with Pattern Energy is attached to my testimony as
23 Exhibit JT-1.

1 **Q. WILL PATTERN ENERGY IMPLEMENT COMPANY ENVIRONMENTAL**
2 **POLICIES OR PRACTICES REGARDING THE 2022 CORONA GENERATION**
3 **EXPANSION?**

4 **A.** Yes. As discussed in more detail in the testimony of Adam Cernea Clark, Pattern Energy
5 actively participates in wind industry efforts to understand, study, and minimize the
6 environmental impacts of wind energy and to advance the development of technology and
7 best practices. Pattern Energy also routinely implements voluntary best management
8 practices (“BMPs”) and mitigation strategies that further its environmental values. As
9 evidence of our commitment to implementing environmental best practices with all of our
10 projects, when Pattern Energy acquired the Mesa Canyons Wind Project in 2018, a wind
11 farm located in Lincoln County, New Mexico, which was previously approved by the
12 Commission in its Final Order in NMPRC Case No. 17-00221-UT, we voluntarily elected
13 to implement the same BMPs and Protective Measures that we proposed, and which were
14 accepted by the Commission for the Corona Wind Project in Case No. 18-00065-UT. These
15 additional BMPs and Protective Measures were not a requirement of the Commission’s
16 Final Order in NMPRC Case 17-00221-UT. Subsequently we incorporated all the same
17 BMPs in our Joint Application in NMPRC Case Nos. 20-00008-UT and 21-00281-UT,
18 both of which the Commission approved. In each instance we applied the same BMPs and
19 Protective Measures to the entire Corona Wind Project and not just the portions involving
20 transmission, notwithstanding the different standards for approval of the location of
21 generation and transmission assets set forth in Section 62-9-3 NMSA 1978.

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

23 **A.** Construction will be managed by Pattern Energy’s in-house construction group, which has

1 successfully overseen the development of more than 6,000 MW of wind projects, including
2 the Clines Corners, Duran Mesa, Red Cloud Wind, and Tecolote Wind Projects (of which
3 the latter three are parts of the Corona Wind Project) near Corona, New Mexico.
4 Construction of the 2022 Corona Generation Expansion will likely be performed by one
5 or more third party contractors under a balance of plant agreement.

6 **Q. WHAT COMMISSION APPROVALS ARE THE JOINT APPLICANTS**
7 **REQUESTING?**

8 **A.** The Joint Applicants request that the Commission approve the location of the 2022 Corona
9 Generation Expansion.

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

12 **A.** No. Neither the Joint Applicants, Pattern Energy nor any affiliates of Pattern Energy are or
13 will be public utilities if the proposed location permits are granted and the Corona Wind
14 Project is constructed.

15 **III. THE 2022 CORONA GENERATION EXPANSION**

16 **Q. PLEASE DESCRIBE THE 2022 CORONA GENERATION EXPANSION.**

17 **A.** The 2022 Corona Generation Expansion will consist of approximately 65 wind turbines,
18 which is part of the overall 950 turbines that have already been approved by the Commission
19 in related proceedings. These 65 turbines will be moved from prior approved areas to aid in the
20 optimization of the layout of the Corona Wind Project. The Corona Wind Project will still be
21 located in Lincoln and Torrance Counties in New Mexico and will encompass approximately
22 543,549 acres of private and state land within the two counties, of which approximately
23 457,241 acres will be private land and 86,308 acres will be state land. To produce the

1 desired energy, it is anticipated that the 2022 Corona Generation Expansion will consist of
2 approximately 65 wind turbines with a nameplate capacity ranging from 2.3 MW to 4.5
3 MW. Exhibit JA-1, attached to the Joint Application, provides a map showing the location
4 of the 2022 Corona Generation Expansion. Of course, as noted in each of our prior filings,
5 the proposed location of the turbines in the 2022 Corona Generation Expansion is subject
6 to change as further onsite studies are performed and more information becomes available.
7 As in the past, the Commission will be notified of these changes to the extent it involves
8 movement of a turbine.

9 **Q. IS THE PROPOSED LOCATION WELL-SUITED FOR WIND ENERGY**
10 **GENERATION?**

11 **A.** Yes. In this regard there is no change to the suitability of the site from the initial information
12 filed in prior Commission cases. Exhibit JT-2 shows the average wind speed across New
13 Mexico at 80 meters above ground level (the approximate height of an average wind
14 turbine). Pattern Energy expects to pair industry leading wind turbine equipment with the
15 strong wind resource in the Corona Wind Project area to maximize energy generation.

16 **Q. HOW WAS THE LOCATION CHOSEN FOR THE CORONA WIND PROJECT?**

17 **A.** As discussed previously, the 2022 Corona Generation Expansion is in an area with a wind
18 resource superior to much of the rest of the State of New Mexico. After starting
19 development for its Broadview and Grady projects in Curry County, New Mexico, Pattern
20 Energy began looking for more opportunities to leverage its experience elsewhere in the
21 state. Once Pattern Energy recognized the favorable resource at the location for the Corona
22 Wind Project, it also recognized that this site has relatively low numbers of sensitive
23 species and natural resources, broad support from private landowners for wind

development, large areas of buildable terrain, and close proximity to the eastern terminus of the proposed SunZia Project.

Q. WHAT IS THE TIMEFRAME FOR CONSTRUCTION OF THE CORONA WIND PROJECTS?

A. Construction of a portion of the 2022 Corona Generation Expansion is expected to begin once all the necessary permits to begin construction are in hand. The in-service date for the 2022 Corona Generation Expansion is by the end of 2026.

Q. HAS THE TIMEFRAME FOR THE CONSTRUCTION OF THE CORONA ENERTAION EXPANSION BEEN DELAYED BECAUSE OF THE CHANGES DESCRIBED IN THIS FILING?

A. No. The changes in this filing are the product of ongoing diligence and development by Pattern Energy.

Q. WILL THE CORONA 2022 CORONA GENERTAION EXPANSION HAVE AN INCREASED NAMEPLATE THAN WAS PREVIOUSLY ESTIMATED IN NMPRC CASE NO. 21-00281-UT?

A. The addition of private lands to the 2022 Corona Generation Expansion will offer increased flexibility for siting wind turbines and potentially for additional MW. This has not been finalized yet.

Q. HOW MANY ADDITIONAL TURBINES WILL THERE BE COMPARED TO THE NUMBER ESTIMATED IN NMPRC CASE NO. 21-00281-UT?

A. Although the overall nameplate capacity of the wind farm may increase, the number of turbines is still expected to be approximately 950. The properties subject to this proceeding will add additional land and aid in the optimization of the windfarm layout currently

1 underway.

2 **Q. WHY WAS THE ADDITIONAL LAND NEEDED FOR GENERATION THAT IS**
3 **THE SUBJECT OF THIS APPLICATION NOT PREVIOUSLY INCLUDED IN**
4 **CASE NO. 21-00281-UT, CASE NO. 20-00008-UT OR CASE NO. 18-00065-UT?**

5 **A.** Portions of the land included in this Joint Application were previously included in the initial
6 filing in NMPRC Case No. 20-00008-UT but were later retracted at the request of the
7 landowner. An Errata was filed removing this proposed generation from that filing. This
8 land has since been acquired by a new landowner who is in full support of the project and
9 wants to include wind generation on these newly acquired lands. The remaining additional
10 land for generation that is part of this filing is included as a “clean up” effort to capture all
11 remaining land needed to efficiently complete the Corona Wind Project and optimize the
12 layout.

13 **Q. ARE YOU FAMILIAR WITH THE CONDITIONS PLACED UPON THE JOINT**
14 **APPLICANTS AS PART OF THE COMMISSION’S FINAL ORDER IN NMPRC**
15 **CASE NOS. 18-00065-UT, 20-00008-UT and 21-00281-UT?**

16 **A.** Yes. I was intimately involved in those proceedings and agreed to those conditions at that
17 time.

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

21 **A.** Yes, I am. I do agree to the numerous conditions and environmental protections that were
22 included as conditions of the Final Order in NMPRC Case Nos. 18-00065-UT, 20-00008-
23 UT, and 21-00281-UT.

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

2 **A. Yes.**

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE JOINT APPLICATION FOR)
THE LOCATION APPROVAL OF THE 2022 CORONA)
GENERATION EXPANSION PURSUANT TO THE)
PUBLIC UTILITY ACT, NMSA 1978, §62-9-3)

Case No. 22-00__-UT

ANCHO WIND LLC, COWBOY MESA LLC, GALLINAS)
MOUNTAIN WIND LLC, MESA CANYONS WIND, LLC,)
PATTERN SC HOLDINGS LLC, VIENTO LOCO LLC,)

JOINT APPLICANTS.)
)
)
)
)

AFFIDAVIT OF JEREMY TURNER

THE STATE OF New Mexico)

COUNTY OF Santa Fe)

Jeremy Turner hereby deposes and states under oath that the foregoing Direct Testimony of Jeremy Turner and supporting Exhibits were prepared under my direct supervision and the statements therein are true and accurate based on my personal knowledge and belief.

Jeremy Turner
Jeremy Turner

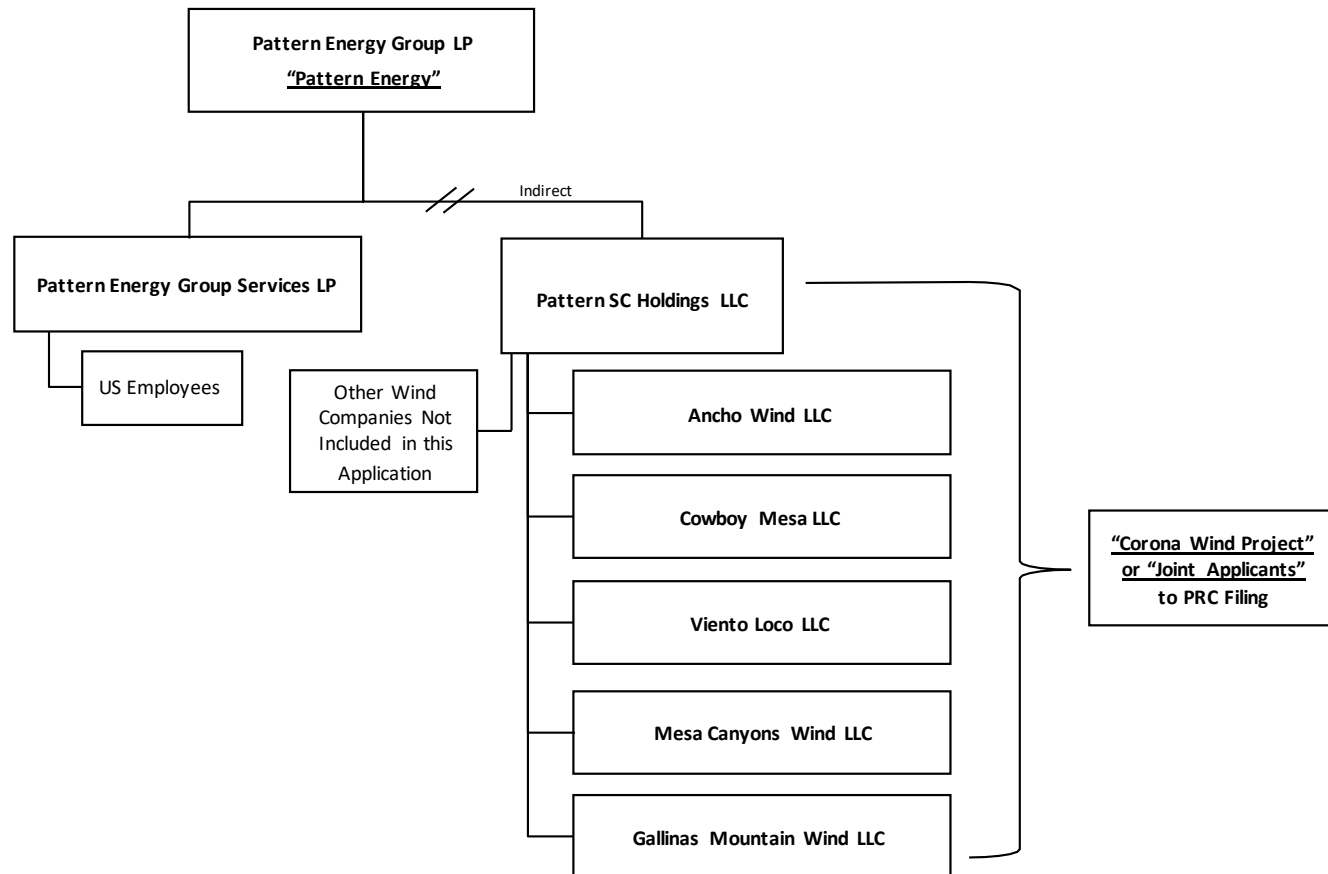
SUBSCRIBED AND SWORN TO BEFORE ME, notary public, on this the 15 day of July,
2022.

My Commission expires: 11/15/2024

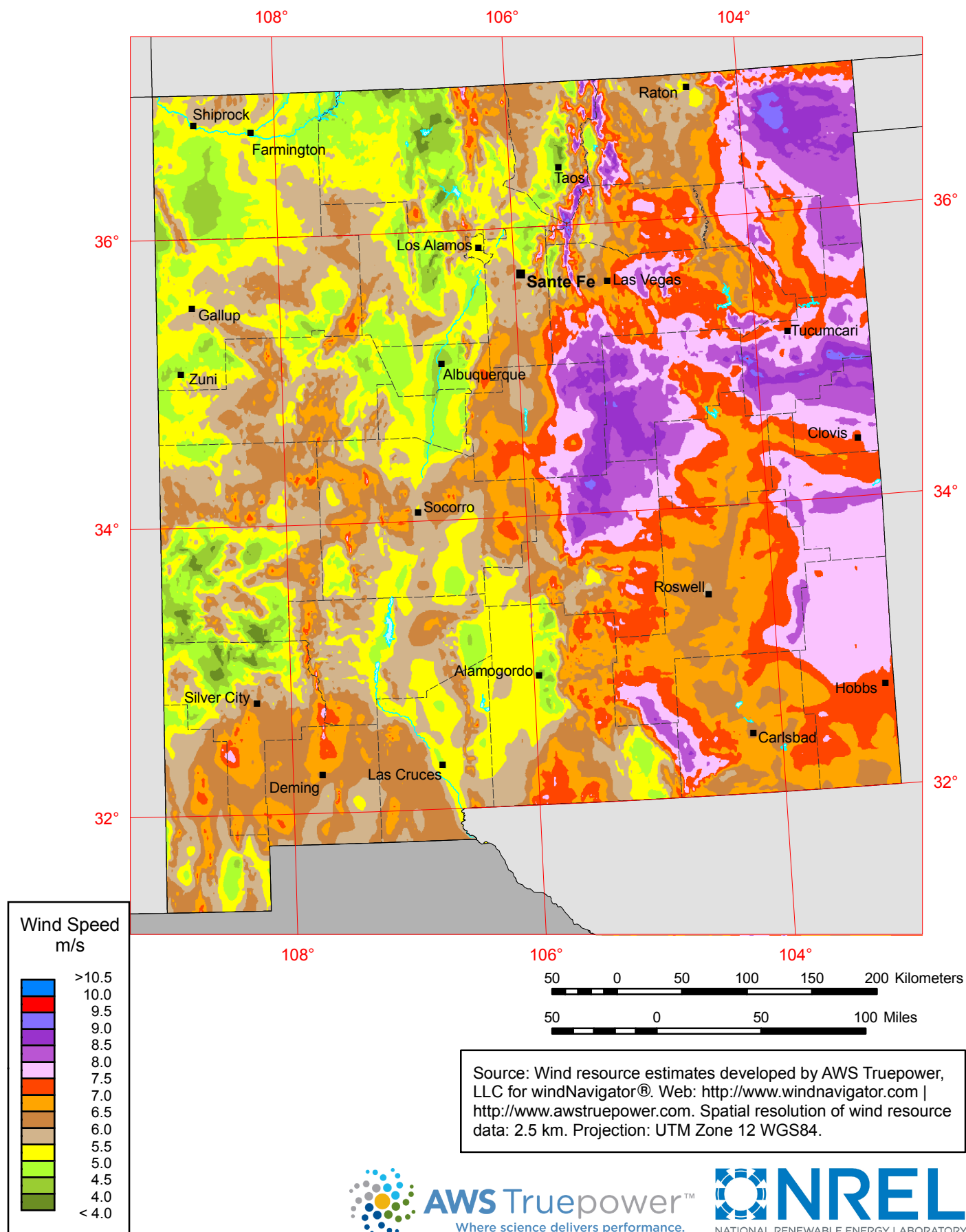
Notary Public, State of: New Mexico
Elizabeth A. Lucero

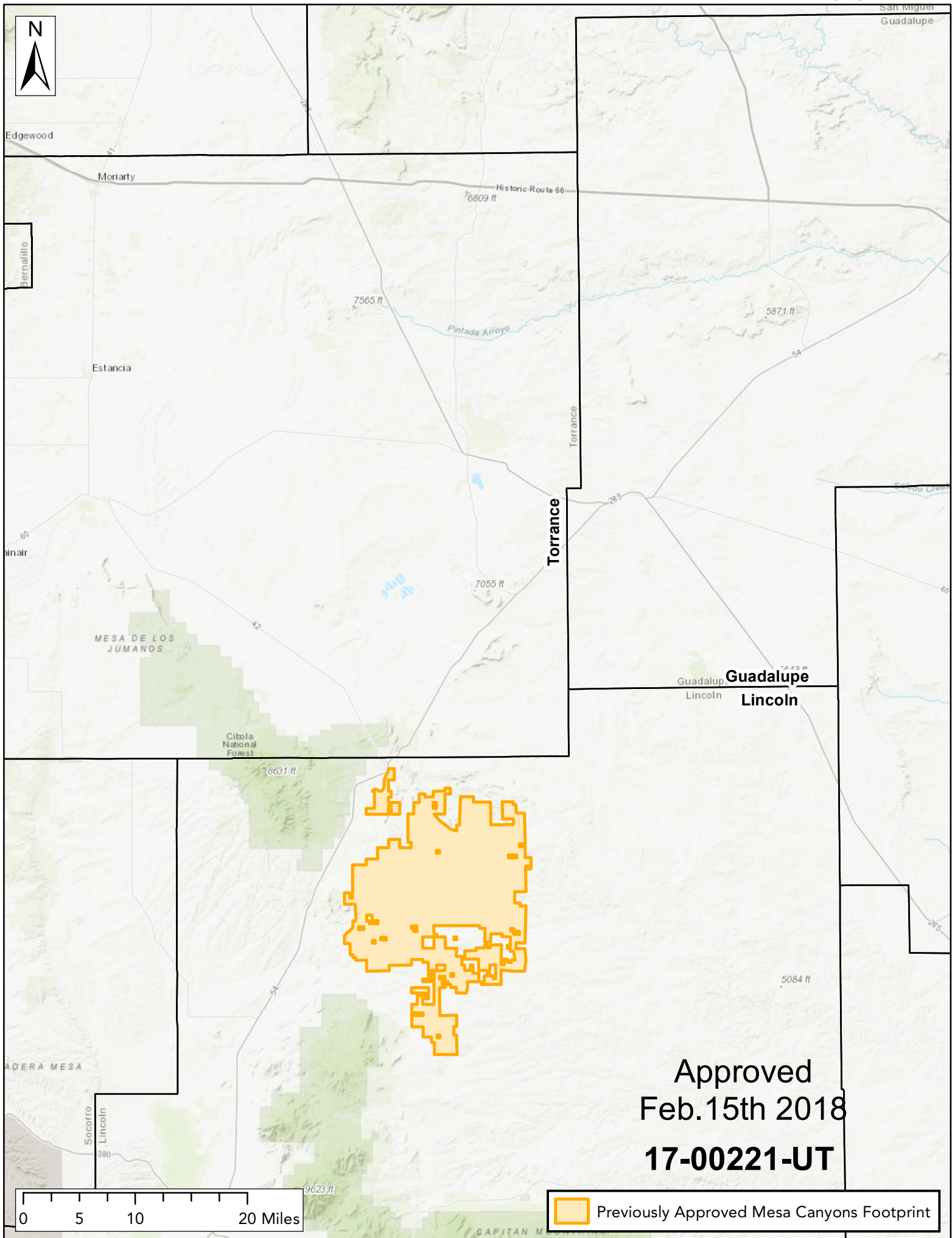
STATE OF NEW MEXICO
NOTARY PUBLIC
ELIZABETH A. LUCERO
COMMISSION # 1082135
COMMISSION EXPIRES 11/15/2024

EXHIBIT JT-1



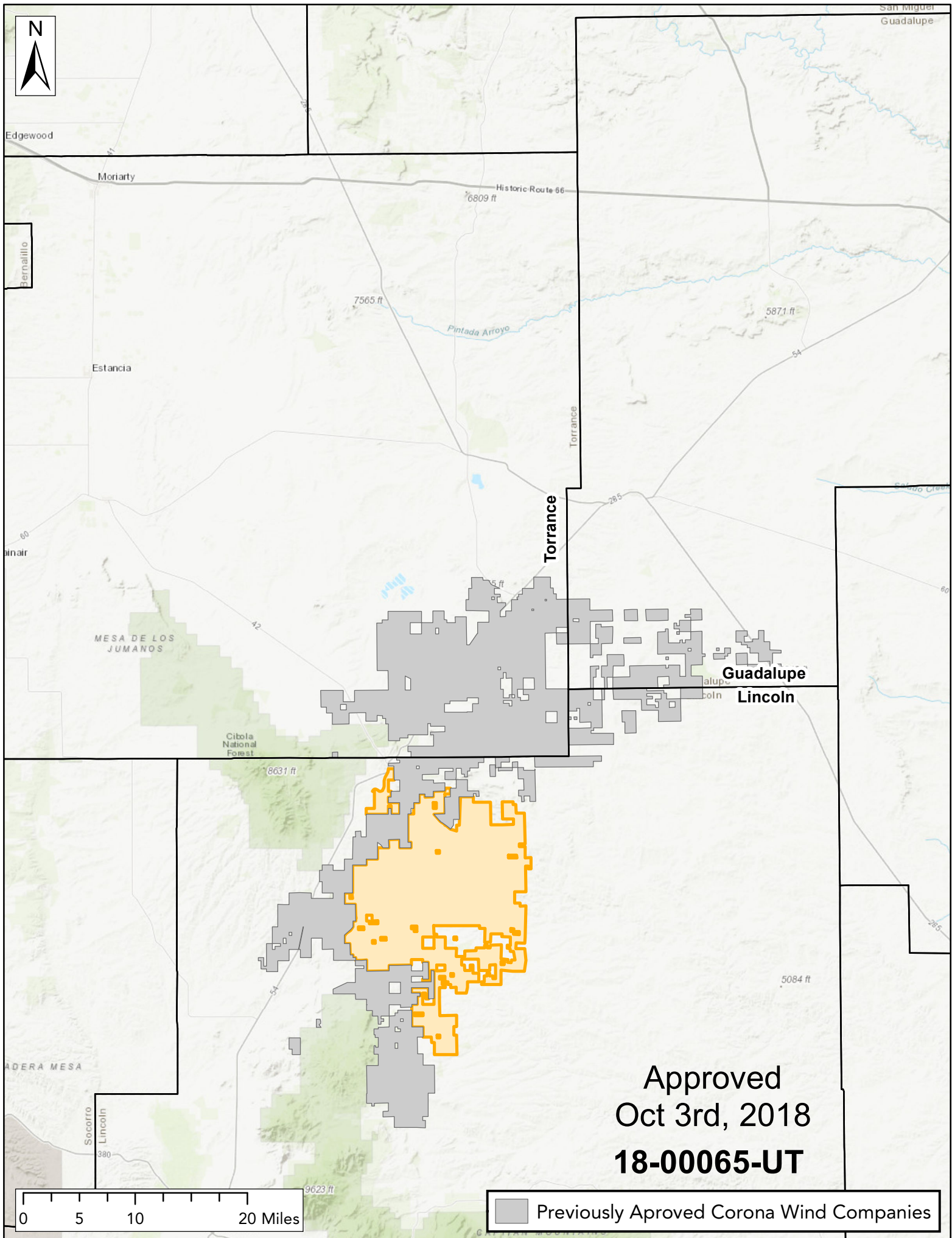
New Mexico - Annual Average Wind Speed at 80 m





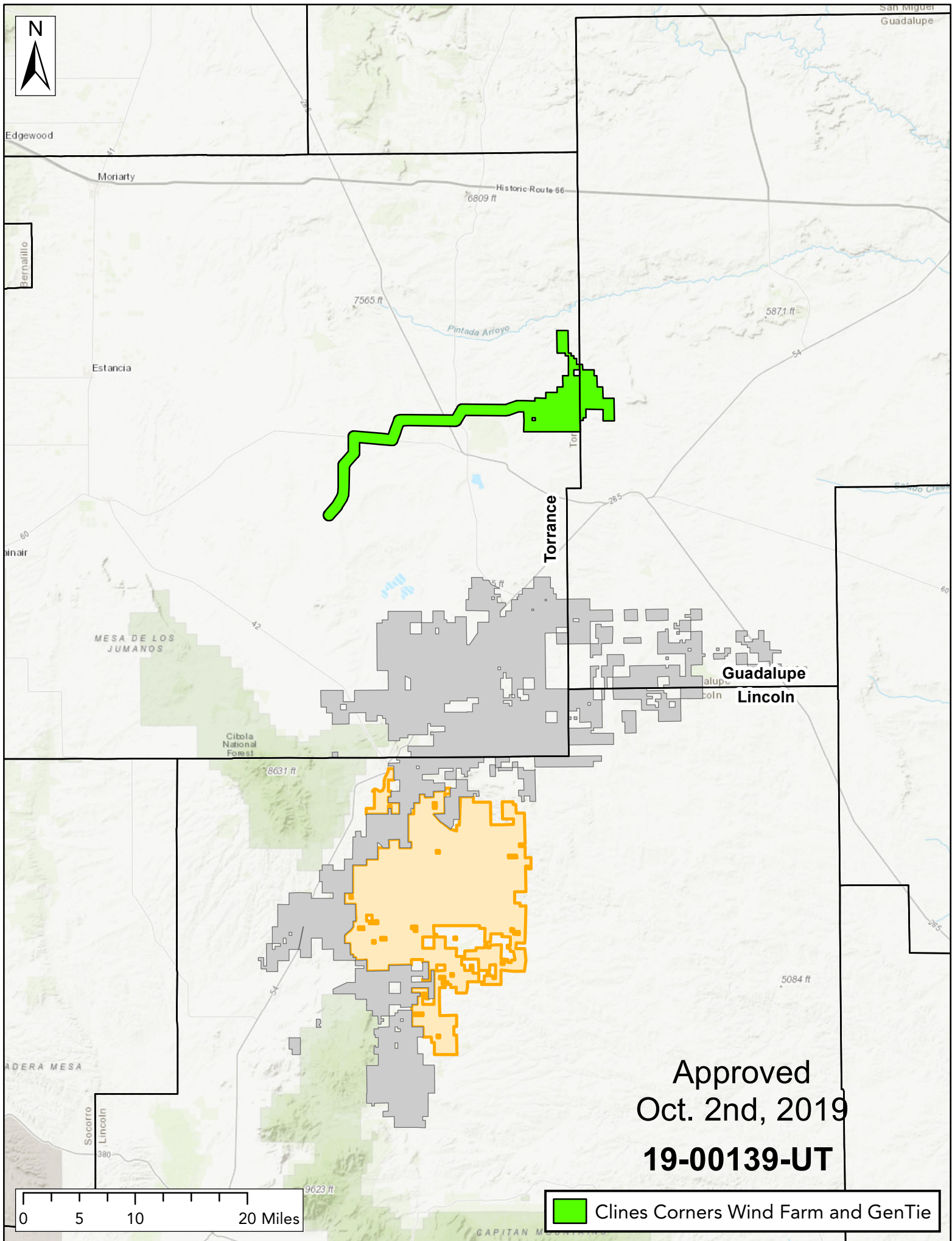
Approved
Feb.15th 2018
17-00221-UT

 Previously Approved Mesa Canyons Footprint



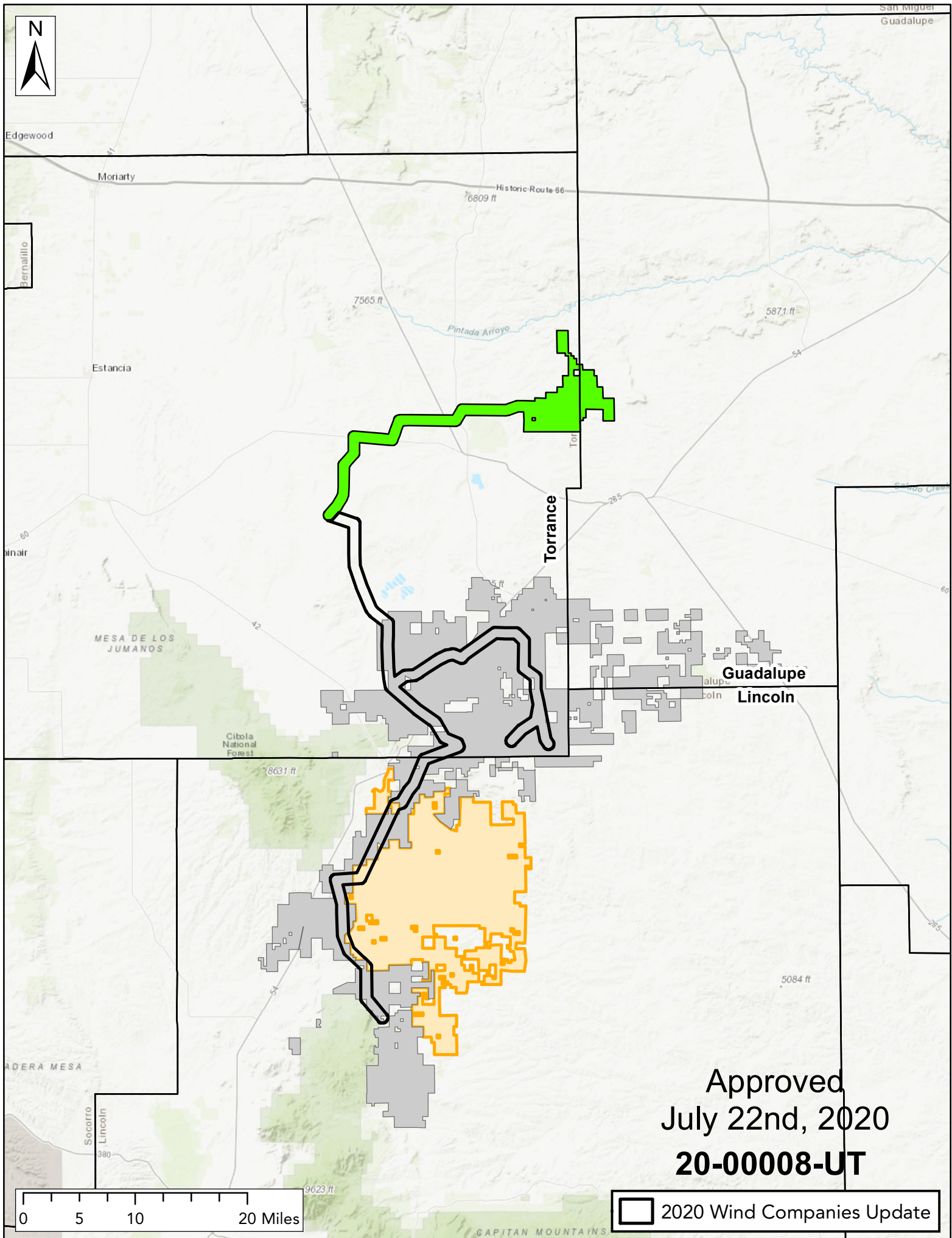
Approved
Oct 3rd, 2018
18-00065-UT

Previously Approved Corona Wind Companies




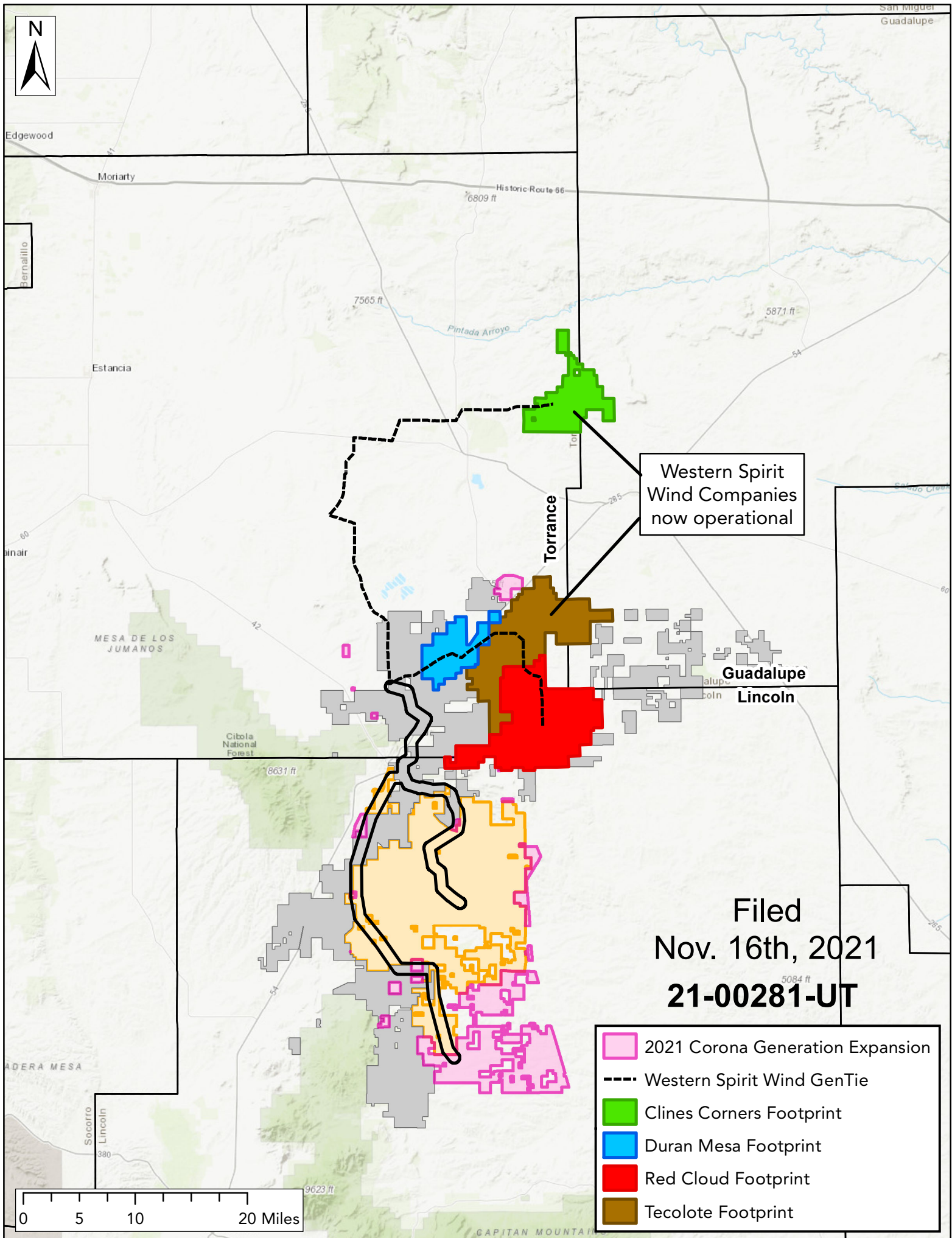
Approved
Oct. 2nd, 2019
19-00139-UT

 Clines Corners Wind Farm and GenTie



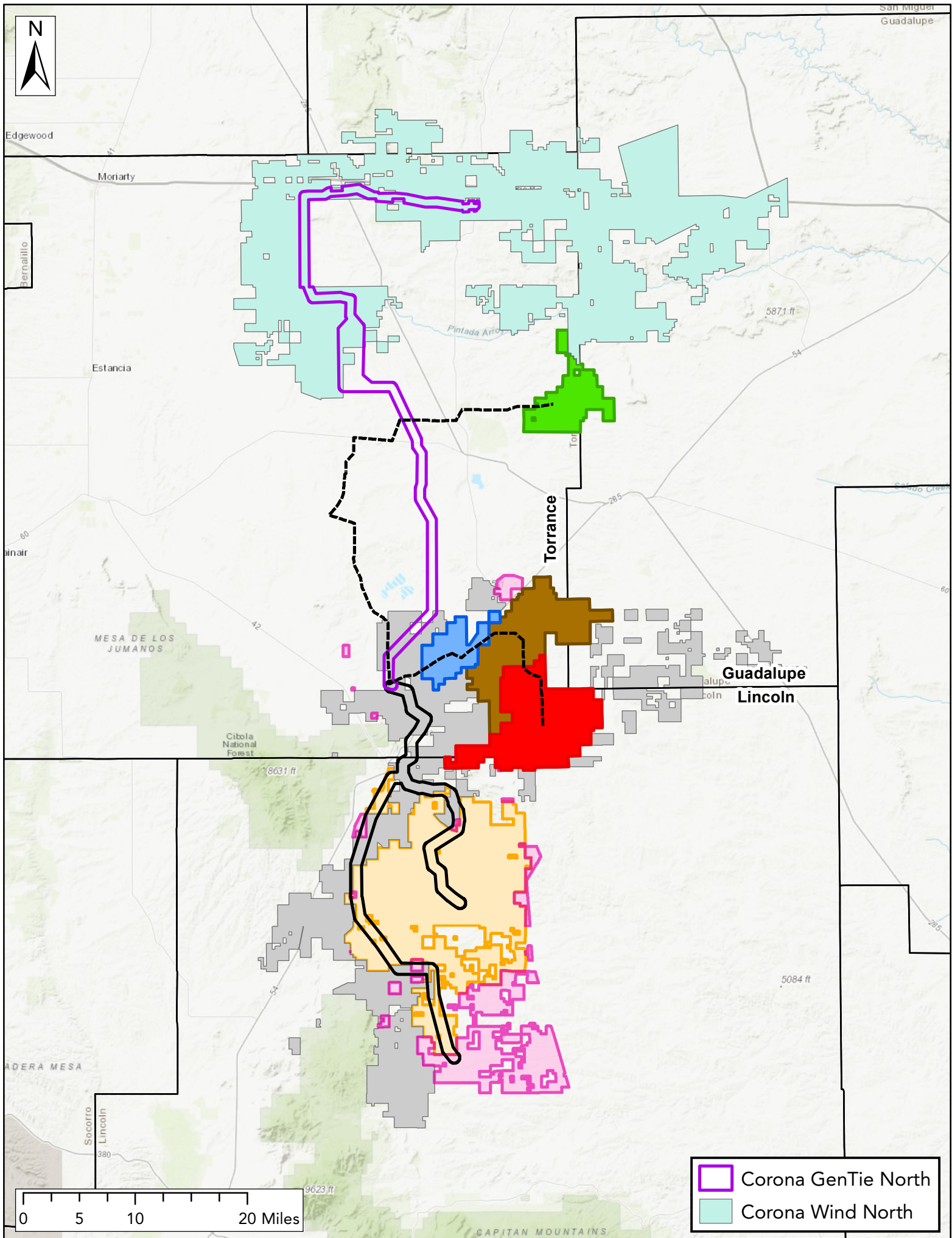
Approved
July 22nd, 2020
20-00008-UT

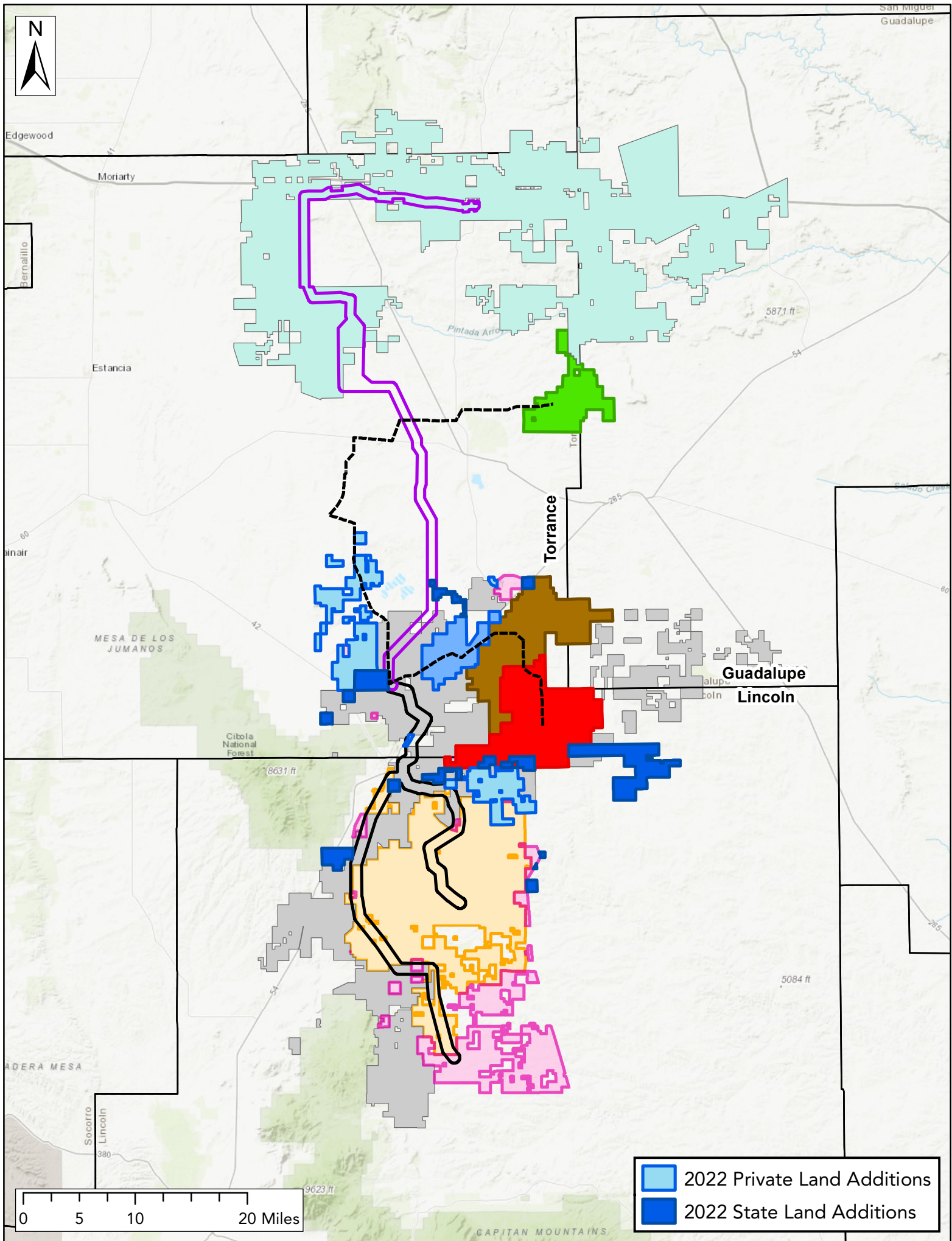
 2020 Wind Companies Update



Filed
Nov. 16th, 2021
21-00281-UT

- 2021 Corona Generation Expansion
- Western Spirit Wind GenTie
- Clines Corners Footprint
- Duran Mesa Footprint
- Red Cloud Footprint
- Tecolote Footprint







Project	Turbine Model	MW Rating	HH	Qty.	MW Subtotal
Red Cloud	2.82-127	2.82	114	124	349.68
Duran Mesa	2.3-116	2.3	80	4	105.08
	2.82-127	2.82	89	34	
Tecolote	2.3-116	2.3	80	9	271.68
	2.82-127	2.82	89	89	
Clines Corners	2.3-116	2.3	80	11	324.22
	2.82-127	2.82	80	58	
	2.82.127	2.82	89	48	
				377	1050.66

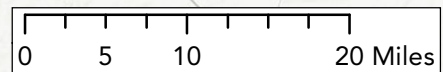
19-00139-UT

20-00008-UT

17-00221-UT

18-00065-UT

21-00281-UT



- 2022 Private Land Additions
- 2022 State Land Additions
- Corona GenTie North
- Corona Wind North
- 2021 Corona Generation Expansion
- Previously Approved Mesa Canyons Footprint
- Previously Aproved Corona Wind Companies
- Western Spirit Wind GenTie
- Clines Corners Footprint
- Duran Mesa Footprint
- Red Cloud Footprint
- Tecolote Footprint

AZ

TX