

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

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|---|---|-------------------------------|
| 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 MAKENA CARUSO

1 **INTRODUCTION**

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

3 A. My name is Makena Caruso. My business address is Total Plaza, 1201 Louisiana St #3200,
4 Houston, TX 77002.

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

6 A. I am a Business Development Analyst for Pattern Energy Group LP (together, with Pattern
7 Energy Group 2 LP, (“Pattern Energy”).

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

10 A. I have a Bachelor of Science in Industrial Engineering from Texas Tech University. I have
11 worked at Pattern Energy for two years on the development of various projects including
12 the Western Spirit Wind Project and Western Spirit Transmission Line.

13 **Q. PLEASE DESCRIBE THE DUTIES AND RESPONSIBILITIES FOR YOUR**
14 **CURRENT POSITION.**

15 A. I serve on the Development team focused on the development and construction of Pattern
16 Energy’s projects in New Mexico, including the proposed 2022 Corona Generation
17 Expansion which is the subject of this proceeding. I currently coordinate work streams
18 between the various departments working on the Corona Wind Project. I primarily assist
19 with matters involving permitting, land, engineering and construction, finance, and
20 accounting.

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

1 A. I am appearing on behalf of the Joint Applicants in this proceeding.

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

3 A. In my testimony, I will provide background on the project development with respect to the
4 location approvals sought in this proceeding. In this regard, I will discuss the efforts of the
5 Joint Applicants to identify additional areas to expand to and locate wind generation, which
6 I refer to in my testimony as the “2022 Corona Generation Expansion”. I will also describe
7 the efforts undertaken to date by the Joint Applicants to secure approvals from the state
8 and private landowners to locate wind turbines in the 2022 Corona Generation Expansion
9 area.

10 **Q. WILL THE 2022 CORONA GENERATION EXPANSION BE LOCATED ON**
11 **PRIVATE LANDS OR STATE LANDS?**

12 A. Both. The majority of the 2022 Corona Generation Expansion will be located on private
13 lands. The total additional acreage is approximately 63,547 acres with 32,730 acres of
14 private land and 30,817 acres of state lands.

15 **Q. PLEASE PROVIDE THE STATUS OF THE JOINT APPLICANTS’ EFFORTS TO**
16 **SECURE NECESSARY APPROVALS FROM PRIVATE LANDOWNERS FOR**
17 **THE 2022 CORONA GENERATION EXPANSION.**

18 A. All land rights necessary for the 2022 Corona Generation Expansion have or will be
19 secured prior to the commencement of any construction.

20 **Q. PLEASE DESCRIBE THE STATUS OF THE JOINT APPLICANTS’ EFFORTS**
21 **TO SECURE APPROVALS FOR LOCATING FACILITIES ON STATE LANDS.**

1 A. Pattern has leased 28,499 acres of the 30,817 acres of State Trust Land that is the subject
2 of this proceeding and has submitted an application with the New Mexico State Land
3 Office for the remaining 2,318 acres.

4 **Q. DO THE JOINT APPLICANTS ANTICIPATE ANY DELAYS IN OBTAINING**
5 **NECESSARY STATE AND PRIVATE LANDOWNER APPROVALS?**

6 A. No. We do not anticipate any significant obstacles to obtaining the necessary approvals to
7 proceed with the 2022 Corona Generation Expansion.

8 **Q. WHAT LAND USE STATUTES AND ADMINISTRATIVE REGULATIONS**
9 **APPLY TO THE 2022 CORONA GENERATION EXPANSION?**

10 A. The 2022 Corona Generation Expansion is subject to the zoning ordinances of the
11 Lincoln County Wind Energy Conversion System and the Torrance County Special Use
12 District for which approval will be sought. The Corona Wind Project
13 will comply with both county ordinances.

14 **Q. WHAT IS THE STATUS OF OBTAINING THE VARIOUS REQUIRED LOCAL**
15 **GOVERNMENTAL APPROVALS FOR THE 2022 CORONA GENERATION**
16 **EXPANSION?**

17 A. We anticipate applying for the Lincoln County Wind Energy Conversion System approval
18 and the Torrance County Special Use District in the third quarter of 2022.

19 **Q. WERE LOCAL COMMUNITIES AND PUBLIC OFFICIALS INFORMED ABOUT**
20 **THE APPROVALS REQUESTED AS PART OF THE 2022 CORONA**
21 **GENERATION EXPANSION?**

1 A. Yes. I, along with other Pattern Energy representatives and representatives of the Joint
2 Applicants, have presented to both the Lincoln County Commission and Torrance County
3 Commission as well as staff for both Counties regarding the proposed project expansion.
4 We have sent updates to the participating landowners, regarding our development efforts
5 which are the subject of this proceeding. The private landowners whose lands are going to
6 be the site of facilities included in the 2022 Corona Generation Expansion have leased their
7 property for the planned construction. Additionally, as noted previously, we have the
8 majority of State Land leased and have submitted an application with the New Mexico
9 State Land Office for the remaining unleased portions of the 2022 Corona Generation
10 Expansion that will be located on State Land.

11 **Q. HAVE THE JOINT APPLICANTS INFORMED THE PUBLIC ABOUT THE 2022**
12 **CORONA GENERATION EXPANSION?**

13 A. Yes. We held a community meeting in December 2021 to update the public about the
14 overall project development and remaining regulatory needs and have sent numerous
15 written landowner updates to landowners and other interested parties about the
16 development planned as part of the 2022 Corona Generation Expansion.

17 **Q. DO THE JOINT APPLICANTS HAVE THE SUPPORT OF THE PRIVATE**
18 **LANDOWNERS AND THE STATE OF NEW MEXICO?**

19 A. Yes. I have attached as Exhibit MC-1 to this testimony, a statement of support from private
20 landowners impacted by the 2022 Corona Generation Expansion.

21 **Q. HAVE YOU EXPERIENCED ANY OPPOSITION TO THE PROPOSED 2022**
22 **CORONA GENERATION EXPANSION?**

1 A. No. As is typical with any project of the scope and size of the Corona Wind Project, it is
2 necessary to provide detailed information to interested persons to enable them to
3 understand the proposed development and avoid any misunderstandings as to the intent of
4 the Joint Applicants. The Joint Applicants have found the interaction with members of the
5 public and local officials invaluable in the planning and implementation of our various
6 projects in terms of being able to identify and resolve potential issues. My particular
7 experience has been that the response to these briefings has been very positive, with many
8 landowners wanting to participate and local government officials satisfied with the
9 information provided and the potential benefits to be realized for their communities.

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

11 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.)
)
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)

AFFIDAVIT OF MAKENA CARUSO

THE STATE OF

Texas

COUNTY OF

Harris

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

Makena Caruso

Makena Caruso

SUBSCRIBED AND SWORN TO BEFORE ME, notary public, on this the 13 day of July 2022.

My Commission expires:

3-15-2025

Notary Public, State of:

Texas



Emily McClary-Davis

May 17, 2022

New Mexico Public Regulation Commission
1120 Paseo De Peralta
Santa Fe, NM 87501

To Whom it May Concern,

My name is Leon Porter and I represent Rocking A Ranch, LLC. We own land in Lincoln County, New Mexico that is affected by Pattern Energy's SunZia Wind project and its development. We are in full support of the project and welcome its development.

Wind power is increasing in popularity across the nation as a form of renewable energy. We have witnessed all the good Pattern Energy has brought to nearby communities through their investment in the Western Spirit Wind Projects which provide financial support to the local schools and counties. During the construction of the Western Spirit Projects, local businesses have seen increased sales and increased tax revenue which has provided much needed help to the economy of the surrounding area. The lease revenues resulting from the SunZia Wind Farm will help local families, farms and ranches.

Thank you for your consideration of the SunZia Wind project. We appreciate your support.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Leon Porter', with a stylized, flowing script.

Leon Porter – Rocking A Ranch, LLC

July 13, 2022

New Mexico Public Regulation Commission
1120 Paseo De Peralta
Santa Fe, NM 87501

To Whom it May Concern,

MYLA POUNDS
My name is *STEVE POUNDS* and I represent *our ranch*. We own land in Torrance County, New Mexico that is affected by Pattern Energy's SunZia Wind project and its development. We are in full support of the project and welcome its development.

Wind power is increasing in popularity across the nation as a form of renewable energy. We have witnessed all the good Pattern Energy has brought to nearby communities through their investment in the Western Spirit Wind Projects which provide financial support to the local schools and counties. During the construction of the Western Spirit Projects, local businesses have seen increased sales and increased tax revenue which has provided much needed help to the economy of the surrounding area. The lease revenues resulting from the SunZia Wind Farm will help local families, farms and ranches.

Thank you for your consideration of the SunZia Wind project. We appreciate your support.

Sincerely,

Steve Pounds
Myla Pounds

July 13, 2022

New Mexico Public Regulation Commission
1120 Paseo De Peralta
Santa Fe, NM 87501

To Whom it May Concern,

Kelley Pounds
My name is *Monty Pounds* and I represent *our ranch*. We own land in Torrance County, New Mexico that is affected by Pattern Energy's SunZia Wind project and its development. We are in full support of the project and welcome its development.

Wind power is increasing in popularity across the nation as a form of renewable energy. We have witnessed all the good Pattern Energy has brought to nearby communities through their investment in the Western Spirit Wind Projects which provide financial support to the local schools and counties. During the construction of the Western Spirit Projects, local businesses have seen increased sales and increased tax revenue which has provided much needed help to the economy of the surrounding area. The lease revenues resulting from the SunZia Wind Farm will help local families, farms and ranches.

Thank you for your consideration of the SunZia Wind project. We appreciate your support.

Sincerely,

Monty Pounds
Kelley Pounds

July 13, 2022

New Mexico Public Regulation Commission
1120 Paseo De Peralta
Santa Fe, NM 87501

To Whom it May Concern,

My name is *Marrin Pounds* and I represent *our ranch*. We own land in Torrance County, New Mexico that is affected by Pattern Energy's SunZia Wind project and its development. We are in full support of the project and welcome its development.

Wind power is increasing in popularity across the nation as a form of renewable energy. We have witnessed all the good Pattern Energy has brought to nearby communities through their investment in the Western Spirit Wind Projects which provide financial support to the local schools and counties. During the construction of the Western Spirit Projects, local businesses have seen increased sales and increased tax revenue which has provided much needed help to the economy of the surrounding area. The lease revenues resulting from the SunZia Wind Farm will help local families, farms and ranches.

Thank you for your consideration of the SunZia Wind project. We appreciate your support.

Sincerely,

Marrin Pounds