



SunZia Wind and Transmission  
c/o Pattern Energy Group LP  
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Attn: Carlyne Mickle

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8 September 2023	10363847-HOU-L-01-A	SunZia	Customer's Discretion

**Subject:** SunZia Wind and Transmission – Environmental and Social Impact Assessment

Dear Carlyne Mickle:

This letter presents the opinion of DNV Energy USA Inc. ("DNV") on the equivalency of environmental and social assessment documentation provided by Pattern Energy Group LP (the "Sponsor") with an Environmental and Social Impact Assessments (ESIA). Environmental and social assessment documentation was prepared for the high-voltage direct current (HVDC) transmission line portion of SunZia Transmission (the "HVDC T-Line"), SunZia Wind South ("SZW South") and SunZia Wind North ("SZW North") being developed by the Sponsor.

The HVDC T-Line is an approximately 550-mile long 525 kV DC transmission line which will extend from the eastern SunZia HVDC converter station ("East HVDC Station") located near SunZia Wind South in central New Mexico to the western SunZia HVDC converter station ("West HVDC Station") near the point of interconnection (POI) at the existing Pinal Central switchyard in central Arizona.

SZW South is the southern wind project within SunZia Wind and Transmission. SZW South is located in Torrance and Lincoln Counties, NM, and consists of seven zones and a total of 674 GE3.6-154 wind turbines for a total rated output of approximately 2,426 MW.

SZW North is the northern wind project within SunZia Wind and Transmission. SZW North is located in Torrance and San Miguel Counties, NM, and consists of three zones and a total of 242 Vestas V163-4.5 wind turbines for a total rated output of 1,089 MW, and a combined SZW South and SZW North total rated output of approximately 3,515 MW. Each zone includes wind turbines, an underground collection system, a substation, a 345 kV overhead transmission line, and associated infrastructure.

DNV has reviewed the environmental and permitting requirements and environmental and social assessment documentation for the HVDC T-Line, SZW South and SZW North. The HVDC T-Line was subject to a review under the National Environmental Policy Act (NEPA; 42 U.S. Code §4321 *et. seq.*) and was required to prepare an Environmental Impact Statement (EIS). An EIS provides a full and fair discussion of significant environmental and social impacts and informs decision makers and the general public of reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. DNV notes that the EIS for the HVDC T-Line has been approved through the appropriate regulatory channels. The EIS, its appendices, and other plans prepared for the HVDC T-Line also contain content that is equivalent to an Environmental and Social Management Plan (ESMP). DNV considers that the EIS is equivalent to an ESIA given that it provides an overview of environmental and social resources, stakeholder engagement, impacts, and avoidance, minimization, and mitigation measures within the study area.



Page 2 of 2

SZW South and North were required to obtain approval from the New Mexico Public Regulation Commission (PRC), who has siting jurisdiction over renewable energy projects in New Mexico. Environmental and social assessment documentation prepared for SZW South and North consisted of two Environmental Reports, which were completed and submitted to the PRC for approval. The Environmental Reports were required to conform with New Mexico Administrative Code 17.9.592.10, which states that, in the event that an EIS is not required under NEPA, these reports must be comparable to an EIS in the format prescribed in 40 CFR Section 1502.10. DNV notes that an EIS was not required for SZW South and North. In addition, the Environmental Reports provide detailed analysis of potential impacts of the SZW South and North and describe detailed environmental and social protection measures. These measures address potential natural resource or social issues and have been incorporated into the design. DNV notes that the PRC provided unanimous approval for all PRC public siting proceedings and included the implementation of the environmental and social protection measures described in the Environmental Reports as a condition of siting approval. In addition, PRC Dockets (PRC Docket Numbers: 18-00065-UT, 20-00008-UT, 21-00281-UT, and 22-00101-UT) include information on stakeholder engagement and mitigation in addition to the content included in the Environmental Reports. DNV notes that the information included in the PRC Dockets has also been incorporated as conditions of approval by the PRC. Environmental Reports and PRC Dockets and other plans prepared for the SZW South and North also contain content that is equivalent to an Environmental and Social Management Plan (ESMP). DNV considers that both Environmental Reports are equivalent to an EIS and an ESIA given that they provide an overview of environmental and social resources, stakeholder engagement, impacts, and avoidance, minimization, and mitigation measures within the study area.

Based on the aforementioned descriptions of environmental and social assessment documentation provided by the Sponsor, it is DNV's opinion that this documentation for the HVDC T-Line, SZW South and SZW North constitutes the equivalent of an ESIA. DNV trusts that the above letter are satisfactory and complete. Please do not hesitate to contact us if you have any additional questions.

Best regards,

For DNV Energy USA Inc.

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