

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**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)
LINCOLN, TORRANCE AND GUADALUPE)
COUNTIES PURSUANT TO THE PUBLIC UTILITY)
ACT, NMSA 1978, §62-9-3)**

Case No. 18-_____

**ANCHO WIND LLC, COWBOY MESA LLC, DURAN)
MESA LLC, RED CLOUD WIND LLC, TECOLOTE)
WIND LLC, VIENTO LOCO LLC,)**

JOINT APPLICANTS.)

DIRECT TESTIMONY OF

STANLEY GRAY

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

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JOINT APPLICANTS.)

Case No. 00065-LIT

DIRECT TESTIMONY OF

STANLEY GRAY

ON BEHALF OF THE CORONA WIND COMPANIES

Case No. 18 - _____ - UT
Before the New Mexico Public Regulation Commission
Direct Testimony of Stanley Gray
on Behalf of the Corona Wind Companies

1 **I. INTRODUCTION AND QUALIFICATIONS.**

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

3 A. My name is Stanley Gray. My business address is 13600 NW 36th Avenue, Vancouver,
4 WA 98685.

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 Development”) as Director, Transmission in Business Development.

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

9 A. I am testifying on behalf of the joint applicants, Ancho Wind LLC, Cowboy Mesa LLC,
10 Duran Mesa LLC, Red Cloud Wind LLC, Tecolote Wind LLC, and Viento Loco LLC,
11 (collectively, the “Corona Wind Companies” or the “Joint Applicants”) in support of their
12 joint application for location control approval of the proposed 2200 megawatt of wind
13 generation of the Joint Applicants’ wind energy facilities (“Corona Wind Projects”) and
14 the 345-kilovolt (“kV”) transmission system and associated transmission facilities,
15 including a 180-foot right of way located within a 1-mile-wide corridor (“Corona Gen-Tie
16 System” or Gen-Tie System) before the New Mexico Public Regulation Commission
17 (“Commission”) pursuant to NMSA 1978, §§62-9-3, 62-9-3.2 and Commission Rule
18 17.9.592 NMAC.

19 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

20 A. I have a Bachelor of Science in Electrical Engineering from Portland State University. I
21 was also a registered professional engineer for approximately forty years in the State of
22 Oregon.

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

2 A. I work on project development teams early in the development process by providing
3 interconnection support and technical support for all aspects of project performance,
4 delivery and development up to construction of the project. After construction is complete,
5 I provide technical support as needed and as requested by the construction team. Projects
6 that I regularly work on include renewable generation and both alternate current and direct
7 current transmission lines and associated facilities. In this case, I will provide technical
8 support for the Corona Wind Projects and Corona Gen-Tie System.

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

10 A. To describe the Corona Gen-Tie System and Corona Wind Projects at a macro-level and
11 discuss how studies will be performed and mitigation measures implemented to ensure that
12 the existing grid is not negatively impacted by these projects.

13 **Q. HAVE YOU TESTIFIED BEFORE ANY REGULATORY AUTHORITIES BEFORE?**

14 A. Yes. I have previously testified before the Texas Public Utility Commission and an
15 administrative law judge in Ontario, Canada. My previous experiences involved testifying
16 as to the capabilities of a proponent seeking to own transmission projects offered in the
17 process of establishing the Competitive Renewable Energy Zones; supporting the
18 proponent of the high-voltage direct current ("HVDC") Southern Cross Project, as well
19 as testifying about the capabilities available in the HVDC facility and testifying in a
20 contested case associated with the connection point for the Henvey Inlet Wind Project.

21 **II. THE CORONA WIND PROJECTS AND THE CORONA GEN-TIE SYSTEM**

22 **Q. HOW WILL THE CORONA WIND PROJECTS CONNECT TO THE GRID?**

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1 A. Each of the Corona Wind Projects will construct new substations to be located within each
2 project area. Approximately 80 miles of 345-kV transmission line will connect the Corona
3 Wind Project's substations to the Eastern terminus of one of the SunZia Transmission
4 LLC's two 500-kV alternative current transmission lines ("SunZia Project"). The technical
5 specifics of the Corona Gen-Tie System (e.g., alignment, structure types) are discussed in
6 detail in the Direct Testimony of Derek Price. Each of the Corona Wind Projects will enter
7 into an Interconnection Agreement with the SunZia Project to transmit the electricity
8 generated by the Corona Wind Projects through the SunZia Project to be sold to out-of-
9 state purchasers located in Arizona, California, and/or Utah under Power Purchase
10 Agreements.

11 **Q. DOES THE SUNZIA PROJECT CONNECT DIRECTLY TO NEW MEXICO'S GRID?**

12 A. No.

13 **Q. ARE THERE CURRENT PLANS TO SELL THE ENERGY GENERATED BY THE CORONA WIND**
14 **COMPANIES TO THE STATE OF NEW MEXICO?**

15 A. No. At the present time there are no plans to sell any of the generation to purchasers within
16 the State of New Mexico. However, as a company, we are always looking for potential
17 markets.

18 **Q. WILL THE CORONA WIND PROJECTS IMPAIR RELIABILITY OF THE CORONA GEN-TIE**
19 **SYSTEM?**

20 A. No. The operators of the SunZia Project will perform interconnection studies following the
21 individual Corona Wind Projects interconnection requests referenced above. These studies

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1 include System Impact Studies which will analyze the possibility of any grid impacts and
2 describe facilities and other measures that can be implemented to mitigate these impacts.
3 The Salt River Project has conducted similar Interconnection Impact Studies associated
4 with the SunZia Project interconnection to the larger grid. The SunZia Project and the
5 Corona Wind Projects will also be added to the Western Electricity Coordinating Council
6 (“WECC”) planning system models, so the grid behavior can be studied into the future. In
7 addition to the System Impact Studies, a qualified engineering firm, will design the Corona
8 Wind Projects and the Gen-Tie System and perform detailed studies of their performance
9 as part of the design process.

10 **Q. WHAT IS THE STATUS OF THE INTERCONNECTION PROCESS WITH THE SUNZIA PROJECT?**

11 A. The SunZia Project is awaiting Federal Energy Regulatory Commission (“FERC”) approval of a designation of the Anchor Tenant. When Anchor Tenant approval is
12 completed, the SunZia Project can accept interconnection requests. At that time, the
13 Corona Wind Projects will submit interconnection applications. The SunZia Project is also
14 awaiting FERC approval of its transmission tariff which will describe the SunZia Large
15 Generation Interconnection Process.
16

17 **III. CONCLUSION**

18 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

19 A. The Corona Wind Projects will be competently designed, and grid impacts thoroughly
20 studied and mitigated as part of the design and interconnection process. The
21 interconnection studies will be completed, and these studies will identify impacts on the
22 grid that will have to be mitigated prior to energizing the Corona Wind Projects. The

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1 Corona Wind Projects will be submitted to WECC for inclusion in the WECC transmission
2 system to be used in future grid planning studies.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?**

4 **A. Yes, it does.**

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AFFIDAVIT OF STAN GRAY

STATE OF WA)
) ss.
COUNTY OF Clark)

I have read the foregoing Direct Testimony, and it is true and accurate based on my own knowledge and belief.

Stan Gray

SUBSCRIBED and sworn to before me this 13 day of March 2018.

Megan K. Meeks
NOTARY PUBLIC

02/15/2020
My Commission Expires

