

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

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**Case No. 18-\_\_\_\_\_**

**DIRECT TESTIMONY OF  
WARD MARSHALL**

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

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Case No. 18-00065-LIT

DIRECT TESTIMONY OF

WARD MARSHALL

ON BEHALF OF THE CORONA WIND COMPANIES

Case No. 18 - \_\_\_\_\_ - UT  
Before the New Mexico Public Regulation Commission  
Direct Testimony of Ward Marshall  
on Behalf of the Corona Wind Companies

1 **Q. PLEASE STATE YOUR NAME, JOB TITLE, EMPLOYER AND BUSINESS ADDRESS.**

2 A. My name is Ward Marshall, Director of Business Development for Pattern Energy Group  
3 LP (together with Pattern Energy Group 2 LP, "Pattern Development"). My business  
4 address is 1201 Louisiana St, #3200, Houston, TX 77002.

5 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL BACKGROUND, EXPERIENCE AND EDUCATION.**

6 A. I oversee all aspects of renewable energy project development for Pattern Development in  
7 North America, including site identification and acquisition, the securing of  
8 interconnection and transmission rights, land lease negotiations, permitting, technology  
9 selection and contracting. Throughout my career I have developed and placed into service  
10 over 1,400 megawatts ("MW") of wind energy in British Columbia, Illinois, Texas,  
11 Wisconsin and New Mexico, including the 324 MW Broadview Wind project in Curry  
12 County, New Mexico, which was placed in service in 2017. I have also served as a  
13 President of the American Wind Energy Association and of the Wind Coalition, a non-  
14 profit organization created to promote the development of wind energy resources in the  
15 south-central region of the United States. Prior to joining Pattern Development in 2009, I  
16 was a Senior Developer at Babcock & Brown where I was responsible for wind project  
17 development in North America, and Senior Vice President for wind project development  
18 at G3 Energy. I was also Regional Sales Manager at GE Energy for the wind energy  
19 platform product line. I hold Bachelor of Science in Civil Engineering from the University  
20 of Texas at Austin.

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

22 A. I am testifying on behalf of Ancho Wind LLC, Cowboy Mesa LLC, Duran Mesa LLC,

Case No. 18 - \_\_\_\_\_ - UT  
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1 Red Cloud Wind LLC, Tecolote Wind LLC, and Viento Loco LLC (collectively, the  
2 “Corona Wind Companies” or the “Joint Applicants”) regarding the proposed 2200 MW  
3 of wind generation of the Joint Applicants’ wind energy facilities (“Corona Wind  
4 Projects”) and associated 345-kilovolt (“kV”) transmission system and associated  
5 transmission facilities, including a 180-right-of-way located within a 1-mile-wide corridor  
6 (“Corona Gen-Tie System” or “Gen-Tie System”). The Corona Gen-Tie System represents  
7 approximately 80 miles of wind generation tie-in transmission lines linking the Corona  
8 Wind Projects’ substations to the Eastern terminus to one of SunZia Transmission LLC’s  
9 two 500-kV alternative current transmission lines.

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

11 A. I will provide an overview of the long-term benefits that the Corona Wind Projects can  
12 bring to New Mexico and other power markets throughout the Southwestern region in the  
13 United States, as well as the state of the wind industry and the strong commercial case for  
14 the Corona Wind Projects. In addition, I will describe the public outreach and engagement  
15 we have undertaken with local landowners, stakeholders, environmental organizations,  
16 public officials, and businesses, and the strong community support enjoyed by the Corona  
17 Wind Projects and Gen-Tie System.

18 **Q. WILL THE CORONA WIND PROJECTS AND GEN-TIE SYSTEM BRING BENEFIT TO THE**  
19 **STATE OF NEW MEXICO?**

20 A. Yes. The Direct Testimony from John Tysseling of Moss Adams and the Corona Fiscal  
21 and Economic Impact Report attached as an exhibit thereto discusses in detail the  
22 significant fiscal and economic benefits to the State of New Mexico associated with the

Case No. 18 - \_\_\_\_\_ - UT  
Before the New Mexico Public Regulation Commission  
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1 proposed Corona Wind Projects and Gen-Tie System. The economic benefit includes over  
2 1,450 jobs, more than \$4.6 billion of direct and indirect economic benefits, and over \$72.6  
3 million of additional state and local tax revenue that will result from the construction and  
4 operation of the Corona Wind Projects and Gen-Tie System.

5 The Corona Wind Projects and Gen-Tie System bring direct benefits to the local  
6 communities through increased tax revenue, economic development, job creation, and  
7 contributions to local causes. Initially, the Corona Wind Projects and the Corona Gen-Tie  
8 System will have hundreds of workers on-site during construction and will ramp up to  
9 thousands of workers at the peak of on-site construction. In previous projects in New  
10 Mexico, we had success having our contractors hire qualified local subcontractors and  
11 workers and we encourage them to do so whenever possible. In addition, our presence  
12 brings significant indirect economic benefits to the region through increased revenues for  
13 service industries, such as local restaurants and hotels, and the purchase of goods and  
14 services during both development and construction. We also take great pride in getting to  
15 know the unique needs and aspirations of each local community so that we can support  
16 local organizations and initiatives that help the community achieve its goals.

17 Lastly, as part of our commitment to environmental stewardship, we work closely with our  
18 local communities and regulators to understand their concerns about environmental  
19 impacts. We incorporate what we learn into our avoidance and mitigation measures, often  
20 collaborating with local officials and regulatory entities and strive to develop plans that  
21 exceed permitting requirements.

Case No. 18 - \_\_\_\_\_ - UT  
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1 **Q. WILL THE CORONA WIND PROJECTS SERVE ELECTRIC UTILITY CUSTOMERS IN NEW**  
2 **MEXICO?**

3 A. Potentially, depending on interest from New Mexico utilities. While our principal plan has  
4 been and continues to be centered on delivering power to the Southwest region of the  
5 United States via the SunZia Project, we continue to seek potential opportunities for in-  
6 state sale and believe that there are potential transmission solutions for such sales.

7 The Corona Wind Projects will tap into some of the strongest, best wind in the United  
8 States, and will be able to market that power throughout electricity markets in the  
9 Southwest region of the United States, including New Mexico. Furthermore, power  
10 contracts can be structured such that the actual delivery of wind energy occurs in alignment  
11 with a given utility's demonstrated need. For instance, if a New Mexico utility plans to  
12 retire an operating facility in the early 2020s and anticipates a need for replacement power,  
13 the Corona Wind Projects will be in a highly competitive position to offer a portion of the  
14 wind project at reliable, long-term, affordable pricing to New Mexico retail customers.  
15 The entirety of the Corona Wind Projects is almost certainly more power than New Mexico  
16 utilities will have an appetite to consume, but the economy of such a large wind project  
17 means that, in the event that a commercially sensible opportunity to deliver power to  
18 domestic consumers of electricity emerges, New Mexicans would benefit from the lower  
19 overall pricing of a project that has shared offtake from other customers throughout the  
20 Southwest, including those in Arizona and California.

21 **Q. WILL THE CORONA WIND PROJECTS BE ELIGIBLE FOR ANY FEDERAL TAX CREDITS?**

22 A. Yes. When the Corona Wind Projects are placed into service in 2020, they will collectively

Case No. 18 - \_\_\_\_\_ - UT  
Before the New Mexico Public Regulation Commission  
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1 be one of the largest wind projects in the United States, as well as one of the last wind  
2 projects able to offer customers the historically low energy prices enabled by the Federal  
3 Production Tax Credit (“PTC”). The permanent phase out of the PTC began in 2016 and  
4 will end in 2020. It was implemented intentionally by bi-partisan lawmakers, in close  
5 coordination with the wind industry, because the long-term future of wind energy is now  
6 highly competitive with the lowest cost conventional generation and is not anticipated to  
7 be renewed or re-instated. However, to achieve a business-friendly transition to phase out  
8 the PTC, the federal government allowed provisions for wind projects to qualify for the  
9 PTC several years in advance of commercial operations, which created the long-term  
10 market certainty necessary for projects like the Corona Wind Projects to succeed. Pattern  
11 Development has taken those necessary steps to qualify the Corona Wind Projects for the  
12 PTC, which means that the they can still offer historically low prices to utility customers.

13 **Q. WILL POWER OUTPUT FROM THE CORONA WIND PROJECTS BE COST COMPETITIVE WITH**  
14 **CONVENTIONAL ELECTRICITY GENERATION?**

15 A. Yes. The Corona Wind Projects will be one of the last and largest power plants in the  
16 United States eligible to deliver full value PTC wind to customers, at a time when the  
17 projected levelized cost of wind is already much lower than the levelized cost of  
18 conventional generation like nuclear and coal, and highly competitive with the projected  
19 levelized cost of both new and existing natural gas plants.

20 **Q. HAVE THE CORONA WIND PROJECTS AND GEN-TIE SYSTEM RECEIVED ANY LETTERS OF**  
21 **SUPPORT FROM COMMUNITY MEMBERS OR STAKEHOLDERS?**

Case No. 18 - \_\_\_\_\_ - UT  
Before the New Mexico Public Regulation Commission  
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1 A. Yes. The Direct Testimony from Crystal Coffman includes the numerous letters of support  
2 we have received from landowners, business leaders, and local officials and shows how  
3 Pattern Development has conducted significant community outreach activities in the due  
4 course of developing the Corona Gen-Tie System and Corona Wind Projects.

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

6 A. Yes, it does.



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COMPANIES' JOINT APPLICATION FOR )  
THE LOCATION OF THE CORONA WIND )  
PROJECTS AND CORONA GEN-TIE )  
SYSTEM PURSUANT TO THE PUBLIC )  
UTILITY ACT, NMSA 1978, § 62-9-3 )

Case No. 18-\_\_\_\_-UT

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

JOINT APPLICANTS )  
\_\_\_\_\_ )

**AFFIDAVIT OF WARD MARSHALL**

STATE OF TEXAS )  
 ) ss.  
COUNTY OF HARRIS )

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

*[Handwritten Signature]*

SUBSCRIBED and sworn to before me this 5th day of March 2018.

*[Handwritten Signature]*  
NOTARY PUBLIC

11-21-2020  
My Commission Expires

