BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF SOUTHWESTERN PUBLIC SERVICE COMPANY'S APPLICATION REQUESTING A DETERMINATION ON LOCATION APPROVAL OF TWO SOLAR FACILITIES, A BATTERY ENERGY STORAGE SYSTEM, AND A 230 KV TRANSMISSION GENERATION TIE LINE IN LEA COUNTY	
AND OTHER ASSOCIATED RELIEF,))
SOUTHWESTERN PUBLIC SERVICE COMPANY,)
APPLICANT.)))

DIRECT TESTIMONY

of

MARK LYTAL

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

TABLE OF CONTENTS

GLOSSA	ARY OF ACRONYMS AND DEFINED TERMS	iii
LIST OF	ATTACHMENTS	iv
I.	WITNESS IDENTIFICATION AND QUALIFICATIONS	5
II.	PURPOSE	10
III.	CIRCUIT DESIGN AND CONSTRUCTION FOR THE PROPOSED TRANSMISSION LINE	12
IV.	INFORMATION REGARDING RIGHT-OF-WAY WIDTH FOR THE GEN-TIE LINE	14
V.	INFORMATION REGARDING THE SPS SELF-BUILD PROJECTS	16
VERIFIC	CATION	20

GLOSSARY OF ACRONYMS AND DEFINED TERMS

Acronym/Defined Term Meaning

BESS Battery Energy Storage System

Commission New Mexico Public Regulation Commission

CCN Certificate of Public Convenience and Necessity

kV Kilovolt(s)

MW Megawatt

O&M Operation and Maintenance

POI Point of Interconnection

Proposed Project Proposed 230 kV/115-kV double circuit

transmission (Gen-tie) line that will extend from SPS's Cunningham Solar Collector Substation to its Cunningham Generation Station in Lea County,

New Mexico

PUA Public Utility Act (NMSA 1978, § 62-3-1, et al.)

ROW Right-of-Way

SPS Southwestern Public Service Company, a New

Mexico corporation

SPS Self-Build Projects SPS's proposed Cunningham 1 and 2 Solar

Facilities and Cunningham 1 BESS

Transmission Facilities Proposed 230/115-kV double circuit transmission

(Gen-tie) line route and collector substation.

Xcel Energy Services Inc.

LIST OF ATTACHMENTS

Attachment	<u>Description</u>
ML-1	230-kV/115-kV double circuit transmission (Gen-tie) line structure drawings.
ML-2	Map depicting the location of the projects.

1		I. WITNESS IDENTIFICATION AND QUALIFICATIONS
2	Q.	Please state your name and business address.
3	A.	My name is Mark Lytal. My business address is 790 S. Buchanan Street,
4		Amarillo, Texas 79101.
5	Q.	On whose behalf are you testifying in this proceeding?
6	A.	I am filing testimony on behalf of Southwestern Public Service Company
7		("SPS"), a New Mexico corporation and wholly owned electric utility subsidiary
8		of Xcel Energy Inc. ("Xcel Energy").
9	Q.	By whom are you employed and in what position?
10	A.	I am employed by Xcel Energy Services Inc., the service company subsidiary of
11		Xcel Energy, as Director, Regional Capital Projects, in the Projects Department of
12		Energy Supply, which is the generation operation and maintenance ("O&M")
13		business unit of Xcel Energy.
14	Q.	Please briefly outline your responsibilities as Director, Regional Capital
15		Projects, in the Engineering and Construction Department of Energy Supply.
16	A.	I am responsible for managing the capital budget process and projects for the SPS
17		region within the Energy Supply business unit. Thus, I am responsible for the

regional capital budget, schedules, development, and construction for all SPS electric generating projects. I directly manage the major projects for SPS and supervise other managers handling smaller projects. My management duties include safety, technical design selection, engineering and contractor oversight, management of the bidding process, and negotiation of major equipment supply agreements. I work with the Environmental, Regulatory, Engineering and Technical Resources, and Resource Planning departments to assist with scoping and planning of new generation and major generation retrofit projects.

9 Q. Please describe your educational background.

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10 A. I have a Bachelor of Science in mechanical engineering from Texas Tech
11 University and a Master of Engineering in engineering management from the
12 University of Colorado.

13 Q. Please describe your professional experience.

I have over 30 years of experience in the utility industry in the design, construction, operation, and maintenance of power generation plants, including coal, combustion turbine/combined cycle facilities, and wind generation. I have worked with Xcel Energy and SPS in engineering management and production,

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supervisory, project, and plant engineering positions. I have served as Director, 2 Technical Resources and Compliance. In that position, I oversaw a multi-state, 3 multi-jurisdiction technical team of over fifty engineers, technical specialists, and compliance specialists. In that role, I developed, monitored, and adjusted the 4 5 policies, procedures, and standards needed to apply comprehensive, effective, and 6 efficient technical knowledge and support of power plant engineering, operations, and maintenance. I have also provided strategic direction and leadership of 7 Energy Supply's internal reliability standard compliance program and its 8 9 implementation. 10 Q. Have you attended or taken any special courses or seminars relating to public utilities? 12 A. Yes. Over my career, I have taken numerous courses and seminars related 13 specifically to the construction and operation of power plants. I have given technical presentations on high energy piping, general project management, 14 15 power plant operations, and maintenance. I have also completed the New Mexico 16 State University Center for Public Utilities training on rate cases.

- 1 Q. Do you hold a professional license?
- 2 A. Yes. I am a registered Professional Engineer in Texas.
- 3 Q. Are you a member of any professional organizations?
- 4 A. Yes. I am a member of the American Society of Mechanical Engineers.
- 5 Q. Have you testified before any regulatory authorities?
- 6 A. Yes. I have submitted pre-filed testimony on SPS's behalf in its three most recent 7 base rates cases before the New Mexico Public Regulation Commission ("Commission"), including Case No. 22-00286-UT. I also filed testimony in 8 9 support of SPS's application to amend its Certificate of Public Convenience and Necessity ("CCN") to convert the Harrington Generating Station from coal to 10 11 natural gas in Case No. 21-00200-UT (Texas Docket No. 52485), and in SPS's 12 current CCN proceeding involving the Cunningham and Plant X Solar Facilities, 13 Case No. 23-00252-UT (Texas Docket No. 55255) and PPA Generational 14 Facilities, Case No. 23-00384 (Texas Docket No. 55849). I also submitted pre-15 filed testimony to the Federal Energy Regulatory Commission in Docket No. 16 ER20-277. Finally, I have served as an expert witness during North American

- 1 Electric Reliability Corporation Standards audit engagements in both engineering
- 2 and leadership capacities.

II. <u>PURPOSE</u>

Q. What is the purpose of your testimony?

A.

I provide information regarding SPS's proposed 230/115-kV double circuit transmission (Gen-tie) line and collector substation (collectively "Transmission Facilities") that will connect SPS's proposed Cunningham Solar Projects and Battery Energy Storage System ("BESS") into SPS's existing Cunningham Generation Substation. The Gen-tie Line will connect SPS's Cunningham Solar Collector Substation, located approximately 10.5 miles northwest of Hobbs, New Mexico, to SPS's existing Cunningham Generation Station, which is approximately ten miles west of Hobbs, New Mexico. I also provide information regarding SPS's proposed Cunningham 1 and 2 Solar Facilities and Cunningham 1 BESS (collectively "SPS Self-Build Projects"). These Projects are located in Lea County, New Mexico.

Specifically, my testimony: (1) describes the circuit design and construction of the Gen-tie Line; (2) discusses the statutory requirements for determining right-of-way ("ROW") widths and explains why SPS is not

- 1 requesting a ROW width approval for the Proposed Project; and (3) provides
- 2 information regarding the SPS Self-Build Projects.
- 3 Q. Was Attachment ML-1 and ML-2 prepared by you or under your
- 4 supervision?
- 5 A. Yes.

1 III. CIRCUIT DESIGN AND CONSTRUCTION FOR THE PROPOSED 2 TRANSMISSION LINE 3 Please briefly describe the interconnection facilities for the Gen-tie Line. Q. 4 A. The Gen-tie Line includes the facilities at SPS's Cunningham Generation Station. 5 At the Cunningham Generation Station, modifications will be made for the 6 termination of the dual circuit transmission (Gen-tie) line that will serve the 7 Cunningham 1 Solar Plant (115-kV) and the Cunningham 2 Solar Plant (230-kV). 8 At the Cunningham Solar Collector Substation, a substation will be built 9 to serve the Cunningham 1 Solar and the Cunningham 2 Solar facilities. The 10 Cunningham 1 portion will be built at 115-kV and the Cunningham 2 portion will 11 be built at 230-kV. Additionally, SPS is planning to construct and operate a 36-12 megawatt (MW) battery energy storage system (BESS) immediately adjacent to 13 the Transmission Facilities. 14 Q. Please briefly describe the design of the circuit for the Gen-tie Line. 15 A. The Gen-tie Line will utilize self-supporting steel structures installed on concrete 16 foundations at the corners and terminations of the transmission line. 17 remaining tangent (in-line) structures will typically be single-pole steel structures 18 on concrete foundations will be installed. Examples of these structures, or

substantially similar structures, are depicted in Attachment ML-1 to my direct testimony. The new shield wires will be a combination of 3/8 inch extra high strength steel and optical ground wire. One of the two (2) shield wires will contain the fiber optic strands are used for communication between relays and other substation equipment and transmit operational information to SPS control centers. The total length of the transmission line is approximately 7 miles (37,117 feet) in length.

8 Q. What is the construction timetable for the Gen-tie Line?

A. Preliminary transmission (Gen-tie) line design began in 2022 and is ongoing. Material requests will be submitted following approval of SPS's application in this case. All material should be available approximately 12-24 months after the material requests are initiated. Construction should take approximately three months to complete, and the expected in-service date of the Proposed Project is October 2025.

1 2		IV. INFORMATION REGARDING RIGHT-OF-WAY WIDTH FOR THE GEN-TIE LINE
3	Q.	What are the statutory requirements regarding ROW widths in relation to
4		the proposed 230-kV/115-kV double circuit transmission (Gen-tie) line?
5	A.	Section 62-9-3.2(A) of the Public Utility Act ("PUA") requires utilities to obtain a
6		Commission determination that a proposed ROW width greater than 100-feet is
7		necessary before constructing a transmission line and associated facilities.
8	Q.	Has SPS determined the ROW width required for the proposed 230-kV/115-
9		kV double circuit transmission (Gen-tie) line?
10	A.	Yes. The Gen-tie Line will generally require a 100-foot ROW width that allows
11		for 50 feet on either side of the center line. The 100-foot width is calculated based
12		on SPS's determination that a typical span width will be 1,100 feet or less.
13		Although SPS will utilize a 25-foot area on each side of the transmission (Gen-
14		tie) line during construction, that use is temporary and is not part of the required
15		ROW for the Proposed Project.

- 1 Q. Is SPS requesting authorization for a ROW greater that 100-feet in this
- 2 **filing?**
- 3 A. No. SPS is not requesting approval for a ROW greater than 100 feet at this time.
- 4 Q. Will SPS notify the Commission if it determines that a ROW width greater
- 5 than 100 feet is necessary at any location of this project?
- 6 A. Yes. SPS agrees to file a notice in the record in this proceeding if it determines
- 7 that a ROW width greater than 100 feet is necessary.

1 V. INFORMATION REGARDING THE SPS SELF-BUILD PROJECTS 2 0. Where will the SPS Self-Build Projects be located? 3 A. The SPS Self-Build Projects will be located west of Hobbs, New Mexico in Lea 4 County. A map depicting the location of the projects is provided as Attachment 5 ML-2 to my direct testimony. 6 O. Please describe the Cunningham 1 Solar Project. 7 The scope of the Cunningham 1 Solar Project is to design, engineer, procure, A. 8 construct, and commission a 72 MW solar facility. 9 Q. describe Cunningham 1 Solar Please the **Project location** and 10 interconnection. 11 A. The project site consists of 6,442 acres, and SPS has land-purchase options in 12 place for all 6,442 acres. SPS will build a new collector substation as part of this project with the generation tie line spanning approximately 5.2 miles from the 13 new collector substation to the existing Cunningham Generating Station 14 15 substation point of interconnection ("POI"). The Cunningham 1 Solar Project

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utilizes the existing POI.

Q.	Please provide the Cunningham 1 Solar Project schedule and in-service date.	
A.	Construction will begin in 2025, and SPS's planned in-service date is April 1,	
	2026.	
Q.	Please describe the Cunningham 2 Solar Project.	
A.	The scope of the Cunningham 2 Solar Project is to design, engineer, procure,	
	construct, and commission a 196 MW solar facility.	
Q.	Please describe the Cunningham 2 Solar Project location and	
	interconnection.	
A.	The project site consists of the same 6,442 acres as the Cunningham 1 Solar	
	Project site. SPS will build a new collector substation as part of this project with	
	the generation tie line spanning approximately 7.0 miles from the new collector	
	substation to the existing Cunningham Generating Station substation POI. Like	
	SPS's other proposed solar facilities, the Cunningham 2 Solar Project utilizes an	
	existing POI.	
Q.	Please provide the Cunningham 2 Solar Project schedule and in-service date.	
A.	Construction will begin in 2025, and the in-service date is planned for April 1,	
	A. Q. A. Q. Q.	

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2027.

1	Q.	Please describe the Cunningham 1 Battery.
2	A.	The scope of the Cunningham 1 Battery is to design, engineer, procure, construct,
3		and commission a 36 MW, four-hour BESS system. The Cunningham 1 Battery
4		will use SPS's surplus interconnection service at the Cunningham Generating
5		Station POI as part of SPS's plan to retain accredited capacity of 72 MW at that
6		POI.
7	Q.	Please describe the Cunningham 1 Battery location and interconnection.
8	A.	The Cunningham 1 Battery will be co-located on the Cunningham 1 Solar Project
9		site's 6,442 acres. SPS has a purchase option for the Cunningham 1 Battery site.
10		The Cunningham 1 Battery will share the new collector substation and
11		approximately 5.2-mile generation tie line that SPS is building as part of the
12		Cunningham 1 Solar Project. Like the solar projects, the Cunningham 1 Battery
13		utilizes an existing POI.
14	Q.	Please provide the Cunningham 1 Battery schedule and in-service date.
15	A.	Construction will begin in 2025, and the in-service date is planned for April 1,
16		2026.

- 1 Q. Does this conclude your pre-filed direct testimony?
- 2 A. Yes.

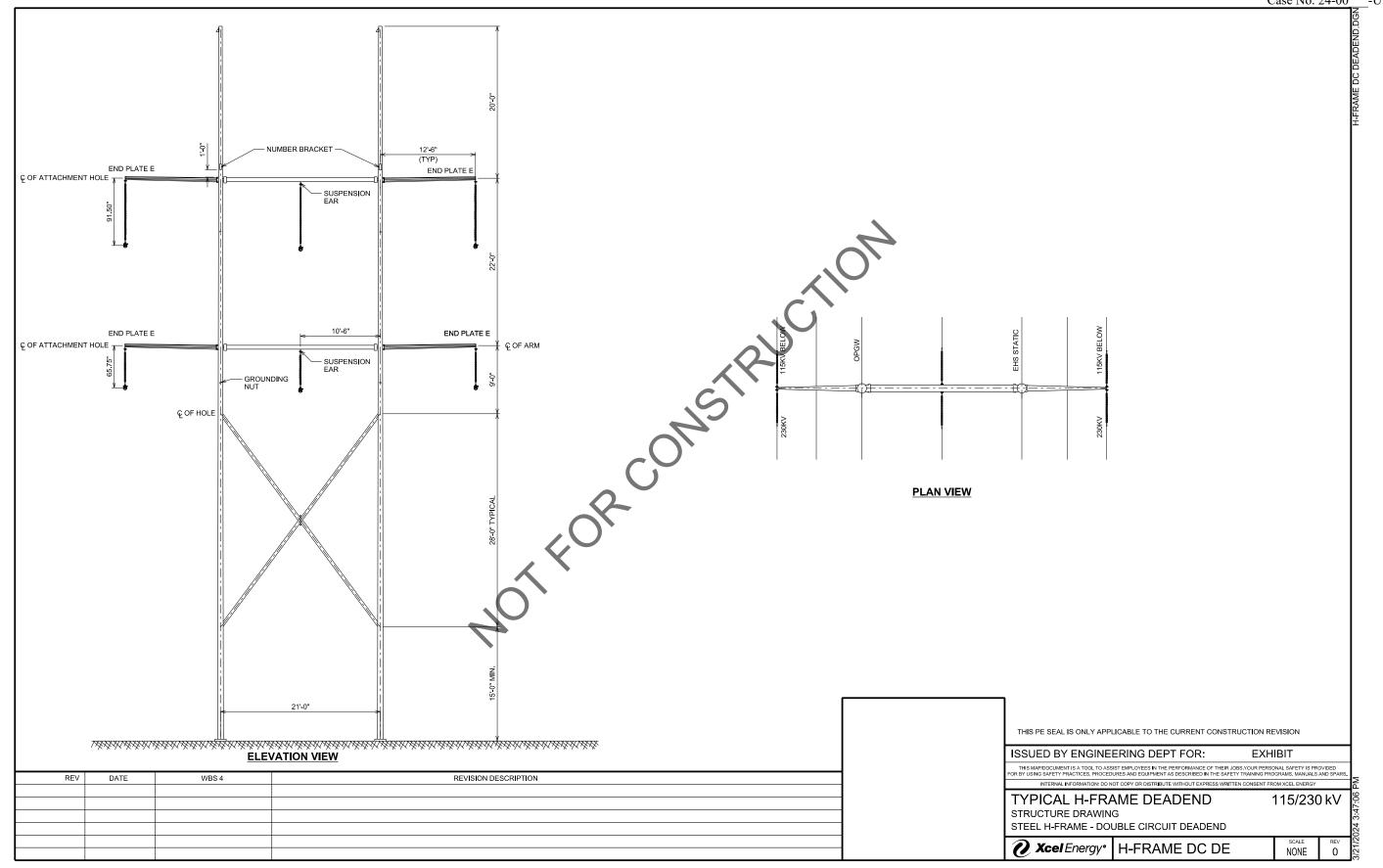
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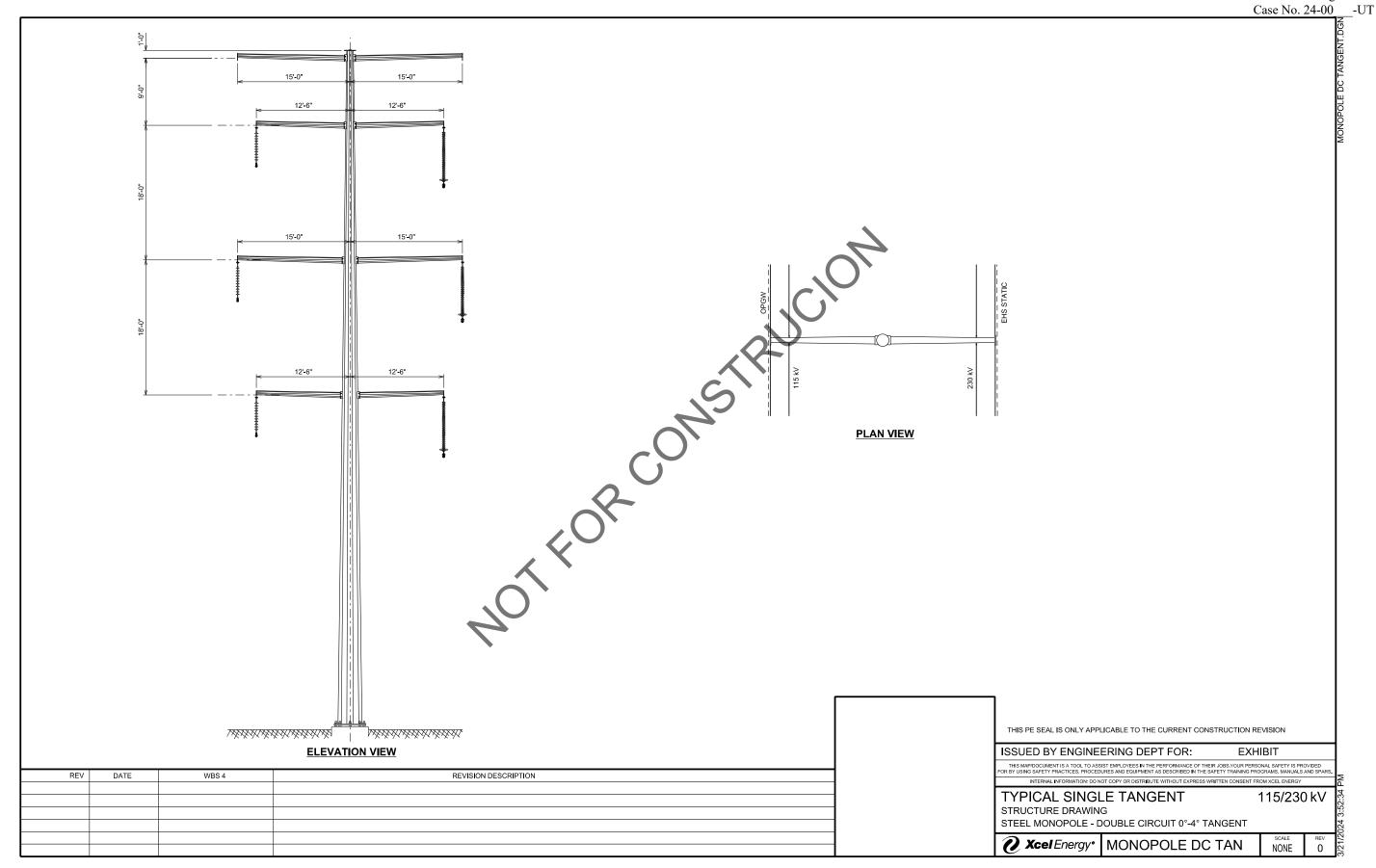
PUBLIC SERVICE COMPANY'S	
)	
APPLICATION REQUESTING A)	
DETERMINATION ON LOCATION)	
APPROVAL OF TWO SOLAR FACILITIES, A)	
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AND A 230 KV TRANSMISSION	
GENERATION TIE LINE IN LEA COUNTY)	
AND OTHER ASSOCIATED RELIEF,)	CASE NO. 24-00UT
)	
SOUTHWESTERN PUBLIC SERVICE COMPANY,	
APPLICANT.	

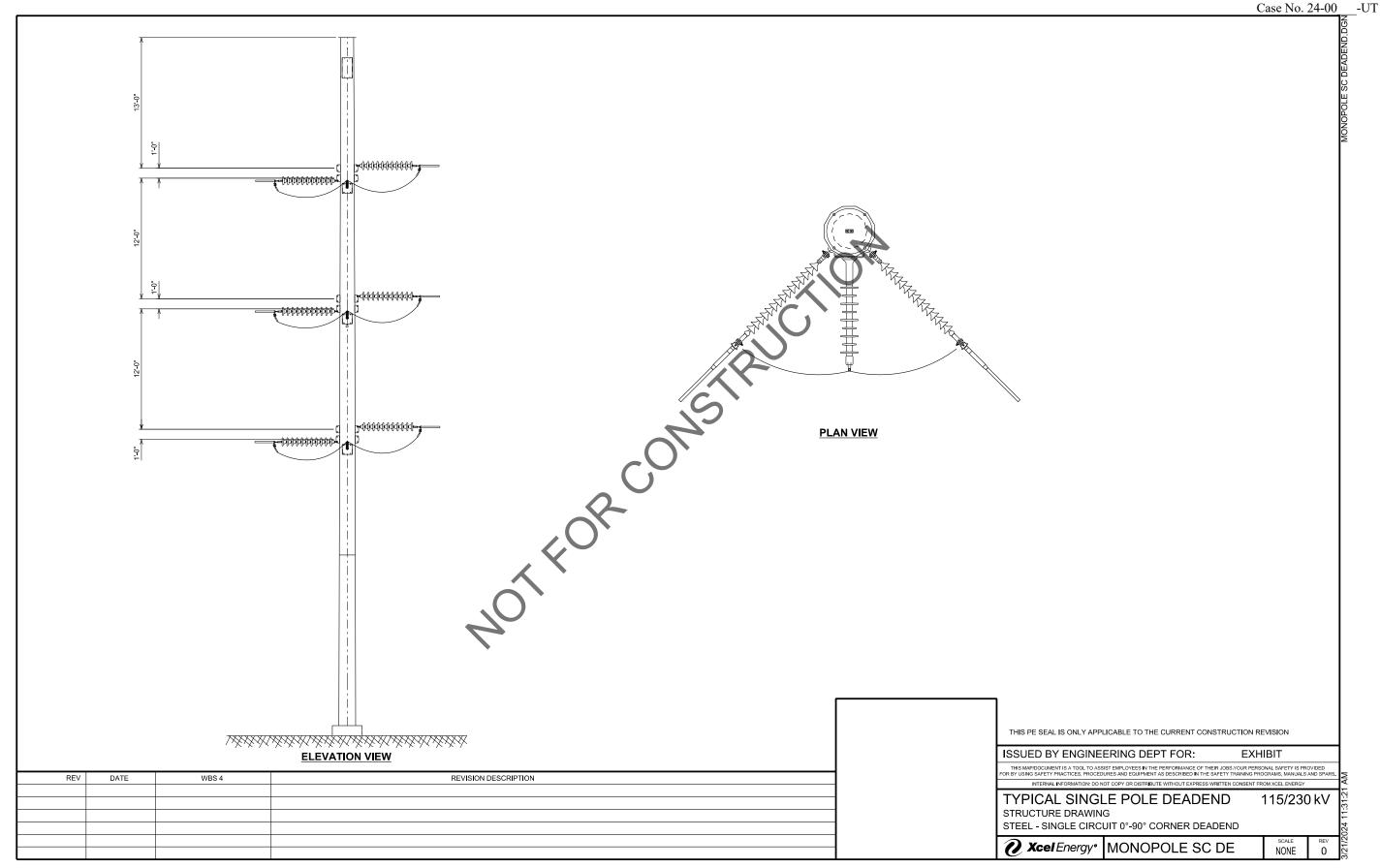
VERIFICATION

On this day, March 28, 2024, I, Mark Lytal, swear and affirm under penalty of perjury under the law of the State of New Mexico, that my testimony contained in Direct Testimony of Mark Lytal is true and correct.

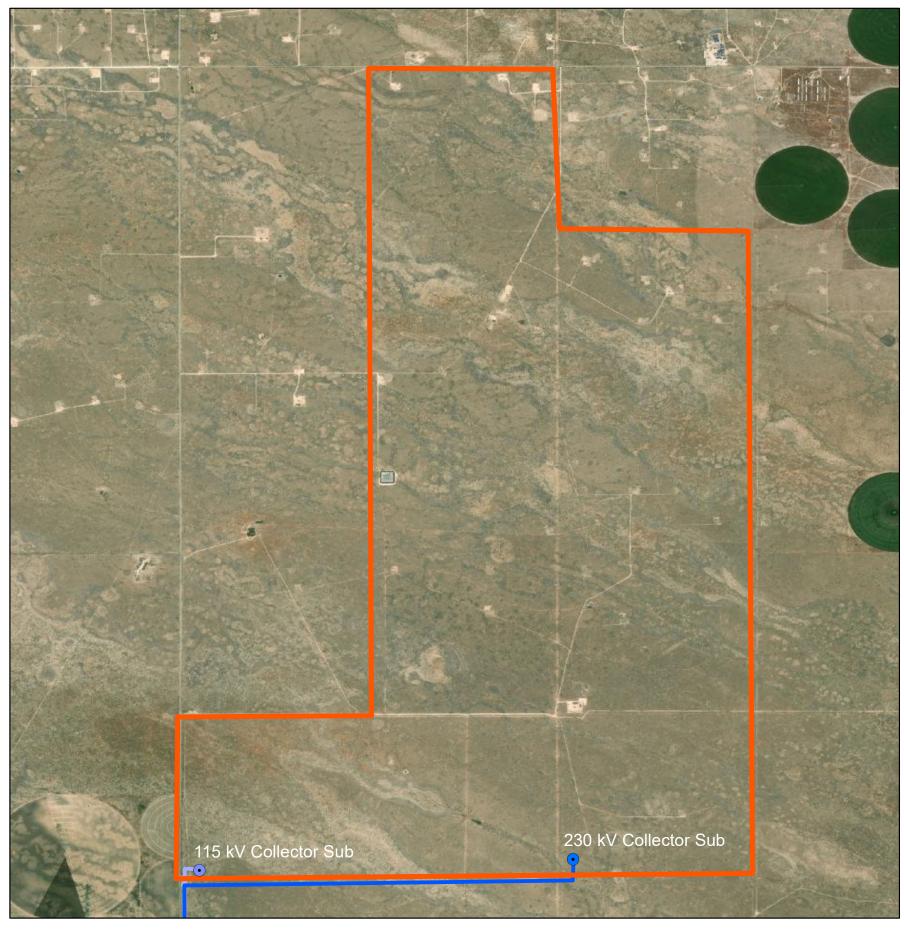
/s/ Mark Lytal	
Mark Lytal	

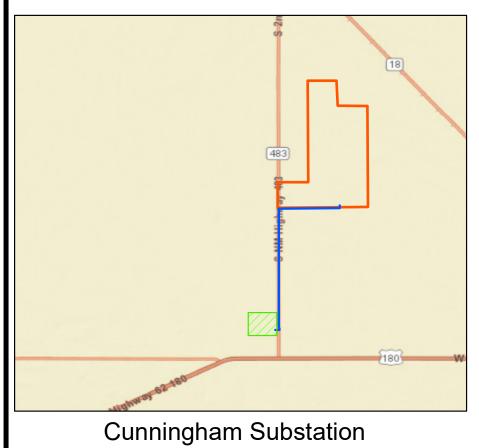


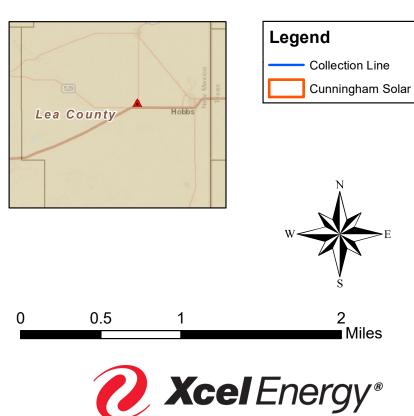




Cunningham Solar







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GENERATION TIE LINE IN LEA COUNTY)
AND OTHER ASSOCIATED RELIEF,) CASE NO. 24UT
SOUTHWESTERN PUBLIC SERVICE	<i>)</i>)
COMPANY,)
APPLICANT.)
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of *Southwestern Public Service Company's Application and the Direct Testimony of Brooke A. Trammell, Mark Lytal, Sean L. Frederiksen and Andrea R. McArdle* was electronically sent to each of the following on this 28th day of March 2024:

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