

BEFORE THE
PUBLIC SERVICE COMMISSION
OF MARYLAND

IN THE MATTER OF THE APPLICATION *
OF LONGVIEW SOLAR, LLC FOR A *
CERTIFICATE OF PUBLIC CONVENIENCE * Case No. 9405
AND NECESSITY TO CONSTRUCT A 15.0 MW *
SOLAR PHOTOVOLTAIC GENERATING *
FACILITY IN WORCESTER COUNTY, *
MARYLAND (LS-SEABEACH) *

* * * * *

DIRECT TESTIMONY
OF
BYRON CRAWFORD
ON BEHALF OF LONGVIEW SOLAR, LLC

December 17, 2015

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

2 A. My name is Byron Crawford. I am a Principal at Longview Solar, LLC, a Joint Venture
3 of TUUSSO Energy and IW Holdings Corporation (a US affiliate of a Canada-based
4 renewable independent power producer, Elemental Energy). Our office is located at 1080
5 W. Ewing Pl - Suite B10, Seattle, WA 98119.

6 **Q. PLEASE DESCRIBE YOUR QUALIFICATIONS.**

7 A. Seven years ago, I co-founded TUUSSO Energy LLC, which develops utility-scale solar
8 photovoltaic power plants across the United States. I have earned a BA from Rutgers
9 University, an MA in Labor in Industrial Relations from Rutgers School of Management,
10 and an MBA from the University of Chicago.

11 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

12 A. Yes. I testified on behalf of LS-Egret, LLC for a CPCN to construct a 15 MW solar
13 photovoltaic project in Wicomico County (Case 9366) and on behalf of Longview Solar,
14 LLC for a CPCN to construct the 20 MW LS-Heron solar photovoltaic project in
15 Worcester County (Case 9403).

16 **Q. ARE YOU FAMILIAR WITH LONGVIEW SOLAR, LLC'S LS-SEABEACH
17 SOLAR FARM PROJECT IN WORCESTER COUNTY, MARYLAND?**

18 A. Yes, I am involved in all aspects of the development of the LS-Seabeach Solar Farm
19 Project (the "Project").

20 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

21 A. To introduce the Longview Solar, LLC and to sponsor Sections 1, 2, 3 and 4A-B of
22 Longview's Environmental Review Document (Longview Solar Exhibit ____ (BC-2)).

1 Q. **DID YOU PREPARE THESE SECTIONS OF THE ENVIRONMENTAL REVIEW**
2 **DOCUMENT, OR WERE THEY PREPARED UNDER YOUR SUPERVISION?**

3 A. Yes.

4 Q. **ARE THERE ANY ADDITIONS OR CHANGES TO THE ENVIRONMENTAL**
5 **REVIEW DOCUMENT NOW BEING SUBMITTED AS AN EXHIBIT TO YOUR**
6 **TESTIMONY SINCE IT WAS ORIGINALLY FILED AS PART OF LONGVIEW**
7 **SOLAR'S APPLICATION IN THIS PROCEEDING?**

8 A. No.

9 Q. **ARE THERE ANY OTHER CHANGES OR ADDITIONS AT THIS TIME?**

10 A. None at this time.

11 Q. **PLEASE EXPLAIN FOR THE RECORD WHY THE TIMELY ISSUANCE OF A**
12 **FINAL CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY IS**
13 **ESSENTIAL FOR THE PROJECT.**

14 A. Longview Solar, LLC must obtain revenue from the sale of the Renewable Energy
15 Credits from the project in order to secure financing with a targeted date to begin
16 receiving such revenue in fall/winter of 2016. As a result, any delays in the project that
17 extend the start of construction and operation may compromise the financing for the
18 project. It is our goal to align project construction and interconnection to receive all
19 necessary local and state approvals and engineering documents by spring of 2016 so that
20 the project can begin operation by fall/winter 2016. We hope to begin construction by
21 late-spring or early-summer of 2016.

22 Q. **WHEN MUST THE FINAL CPCN BE ISSUED TO ALLOW CONSTRUCTION**
23 **TO BEGIN LATE-SPRING/EARLY-SUMMER 2016?**

1 A. Longview Solar, LLC is committed to meeting the operation target of Fall/Winter 2016
2 and we estimate that a May 18, 2015 issuance is necessary to allow for sufficient time to
3 allow construction to begin in the late-spring or early-summer of 2016.

4 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

5 A. Yes.