

LPSC DOCKET NO. U-

TESTIMONY

of

MS. SHANNON GWIN

on behalf of

SOUTHERN SPIRIT TRANSMISSION LLC

APPLICATION OF SOUTHERN SPIRIT TRANSMISSION LLC

FOR TRANSMISSION CERTIFICATION

FEBRUARY 2022

1 I. INTRODUCTION

2 Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. Shannon Gwin, 235 Desiard Street, Suite 2, Monroe, LA 71201 and 104 First
4 Choice Drive, Suite B, Madison, MS 39110.

5

6 Q2. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

7 A. I am employed by Pattern Energy Group (“Pattern”) developing the Southern Spirit
8 Transmission Project (“Project”) as a Senior Land Manager.

9

10 Q3. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL
11 QUALIFICATIONS AND BUSINESS EXPERIENCE.

12 A. I am a licensed Realtor in Louisiana and New Mexico. I have fifteen (15) years of
13 experience working in land acquisitions for energy projects, including serving as a
14 Project Manager for the past nine (9) years. I most recently served as a Land
15 Manager for the 155-mile long Western Spirit Transmission Line project in New
16 Mexico and the 550-mile long Sunzia Transmission Line project in Arizona and
17 New Mexico. My resume is attached hereto as Exhibit SG-1.

18

19 Q4. HAVE YOU TESTIFIED PREVIOUSLY BEFORE THE LOUISIANA PUBLIC
20 SERVICE COMMISSION?

21 A. I have not had the opportunity to testify before the Louisiana Public Service
22 Commission (the “Commission” or “LPSC”) prior to the Southern Spirit
23 Transmission Line project.

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II. PURPOSE OF TESTIMONY

Q5. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to describe my role in the Project, which includes oversight of the land processes, participation in the routing process (including continued route refinement efforts) and involvement during ongoing community outreach.

Q6. WAS YOUR TESTIMONY AND THE INFORMATION YOU HAVE BEEN IDENTIFIED AS SPONSORING PREPARED BY YOU OR BY KNOWLEDGEABLE PERSONS UNDER YOUR SUPERVISION AND UPON WHOSE EXPERTISE, JUDGMENT AND OPINIONS YOU RELY IN PERFORMING YOUR DUTIES?

A. Yes.

Q7. IS THE INFORMATION CONTAINED IN YOUR TESTIMONY AND THAT YOU ARE SPONSORING TRUE AND CORRECT TO THE BEST OF YOUR KNOWLEDGE AND BELIEF?

A. Yes.

Q8. WERE OPEN HOUSES HELD BY SOUTHERN SPIRIT TRANSMISSION LLC (“SST”) IN LOUISIANA IN MAY OF 2016, AND IF SO, WHO PARTICIPATED AND WHAT WAS THE EXTENT OF INFORMATION PROVIDED DURING THOSE OPEN HOUSES?

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1 A. I was not employed by Pattern at the time of the 2016 open houses (the “Open
2 Houses”), but many members of the Pattern team presently working on the Project
3 as well as a series of consultants did plan and attend the Open Houses. The Open
4 Houses were hosted strategically across the entire proposed route of the Project and
5 were advertised broadly in local papers, community bulletins, as well as on social
6 media. This was all in addition to heavy one on one outreach between land
7 acquisition agents and landowners who held property on one of the possible study
8 routes of the Project. At each of the Open Houses the Project team had a series of
9 educational stations with experts to provide details about each discipline working
10 on the Project (routing, permitting, siting, development, engineering &
11 construction, land acquisition, and operations) as well as GIS and mapping stations
12 where landowners and community members could see the proposed route of the
13 Project and add notes in real-time about their properties or comments about the
14 route with members of the Project team. The meetings also allowed the public time
15 for question and answer sessions and an opportunity for members of the public to
16 meet the Project team and learn about employment and economic development
17 opportunities.

18

19 Q9. HAVE YOU REVIEWED THE FEEDBACK GATHERED FROM THOSE
20 PUBLIC OPEN HOUSES?

21 A. Yes, I have reviewed that information.

22

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1 Q10. HOW WAS THE INFORMATION GATHERED FROM THE PUBLIC
2 MEETINGS USED IN THE SST ROUTING PROCESS?

3 A. I reviewed all available documentation gathered from previous meetings in order
4 to identify and carefully consider all landowner concerns that were noted in those
5 meetings. As detailed in the testimony of Tim Barton and his accompanying routing
6 report, route adjustments were made based on numerous factors, including input
7 received from the public meetings.

8

9 Q11. AFTER THE OPEN HOUSES, WERE ROUTING ADJUSTMENTS MADE
10 BASED UPON THE INFORMATION GATHERED FROM LANDOWNERS
11 AND OTHERS?

12 A. Yes, route refinements were made as a result of public input and landowner
13 feedback, as well as from documentation and comments gathered from previous
14 open house meetings, on the ground observations of any changes, and from
15 landowner feedback received during survey permission interactions.

16

17 Q12. ARE LANDOWNERS THAT ARE IMPACTED BY ADJUSTMENTS TO THE
18 CURRENT SST PROJECT ROUTE GIVEN NOTICE AND AN OPPORTUNITY
19 TO PROVIDE COMMENTS?

20 A. Yes. In fact, most route adjustments are initiated by the landowners along the route
21 and it is our job to coordinate with and accommodate those landowners. To my
22 knowledge, there are no other notifications sent to landowners along the route that
23 were affected by adjustments who did not initiate the change in the route to begin

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1 with. Note that a letter has or will be sent to all landowners who own property on
2 the route that is being presented to the LPSC in this application. That letter differs
3 from any notifications related to route adjustments.

4

5 Q13. SINCE THE OPEN HOUSES, WHO HAS BEEN PRIMARILY RESPONSIBLE
6 ON BEHALF OF SST FOR CONTINUING LANDOWNER OUTREACH?

7 A. I am primarily responsible for managing a team of internal and contract land
8 professionals (the "SST Land Team") that is responsible for continued outreach
9 efforts to landowners, including in-person meetings, telephone communications,
10 email, and other written communications.

11

12 Q14. PLEASE DESCRIBE THE NATURE OF YOUR LANDOWNER OUTREACH
13 EFFORTS.

14 A. SST Land Team members pursue all communication efforts according to what is
15 reasonable to the landowner, whether in-person or in writing. All actual and
16 attempted contact is carefully documented in a shared database and reviewed by
17 me and further discussed with SST Land Team members, if necessary. SST Land
18 Team members attempt multiple contacts with landowners. If we are unable to
19 reach a landowner via one method of contact, we research and attempt to contact
20 the landowner via other methods.

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1 Q15. WERE ADDITIONAL REFINEMENTS TO SOME SEGMENTS MADE AS A
2 RESULT OF THESE LANDOWNER CONTACTS?

3 A. Yes. Route refinements were considered and, in some cases, implemented based
4 upon ground observations and landowner feedback received during survey
5 permissions or during interactions for agent and Project introductions. In many
6 instances, routes are chosen based on a review of desktop images. Actual field
7 visits by agents accompanied by landowner conversations about property use are
8 often the best way to understand the need for any necessary route refinements. SST
9 Land Team members regularly conducted such field visits. Following such visits,
10 adjustments to the route can be implemented on a small scale that will often only
11 affect the landowner who initiated the request for adjustment. Adjustments that
12 could affect neighboring properties can often be determined during these visits as
13 well. In either case, agent visits are often the best source of routing information
14 because they allow the landowner to provide much needed feedback about land use
15 and ensure landowner participation in the process as a whole. The SST Land Team
16 encourages this interaction and regularly engaged, and continues to engage, with
17 affected landowners. These contacts have resulted in some refinements to the route
18 for the Project.

19

20 Q16. PLEASE DESCRIBE THE TYPES AND REASONS FOR THESE CHANGES.

21 A. Route refinements were made to address new or different improvements or other
22 observed changes to the landowner's property within the proposed right-of-way on

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1 that landowner's property, as well as based on feedback from landowners regarding
2 proposed land uses for a future purpose and access to their property.

3

4 Q17. PLEASE DESCRIBE THE PROCESS TO REVIEW AND APPROVE THE
5 PROPOSED REFINEMENTS TO CERTAIN SEGMENTS.

6 A. Route refinements are discussed and evaluated by a multi-disciplinary team during
7 scheduled calls with members of the Southern Spirit team consisting of
8 representatives from the departments of engineering, land, GIS, development,
9 environmental, and field management. Each representative carefully reviews the
10 suggested change from the perspective of that representative's department and
11 provides a recommendation. The developer for the Project then weighs each
12 department's recommendation in light of the overall routing criteria established for
13 the Project and provides a final decision approving or rejecting the requested route
14 refinement.

15

16 Q18. WHAT EFFORTS DID SST UNDERTAKE TO IDENTIFY INTERESTED
17 PARTIES OWNING PROPERTY ON THE FILED ROUTE?

18 A. SST pulled ownership data from tax records and from recorded vesting information
19 in the real property records.

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1 Q19. WILL ANY OTHER NOTIFICATIONS BE PROVIDED TO PROPERTY
2 OWNERS ON THE FILED ROUTE?

3 A. Yes. A letter has or will be sent to all landowners who own property on the route
4 that is being presented to the LPSC in this application.

5

6 Q20. DO YOU ANTICIPATE THAT FUTURE ROUTE MODIFICATIONS MAY
7 BECOME NECESSARY?

8 A. Yes. As servitude and right-of-way negotiations advance and unique uses of land
9 are better understood, minor route refinements may become necessary.

10

11

III. PROJECT BUILDOUT

12 Q21. PLEASE DESCRIBE OTHER PROJECT ACTIVITIES YOU WILL OVERSEE.

13 A. In addition to continuing to oversee and attempting to obtain remaining survey
14 permissions, I will negotiate option agreements and servitude/right-of-way
15 agreements with landowners, communicate and negotiate route refinements,
16 organize appraisal efforts if required, provide landowner notifications and support
17 with any survey efforts, document any construction stipulations and restrictions as
18 agreed in contract negotiations, and provide property owners with a local Pattern
19 representative until project completion.

20

21 Q22. WILL SST BE HIRING LAND PROFESSIONALS TO WORK FOR YOU AND
22 ASSIST IN THE PROCESS?

23 A. Yes.

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2 Q23. WHAT ARE YOUR PLANS WITH RESPECT TO USE OF LOUISIANA
3 RESIDENTS?

4 A. Currently, there are Louisiana professionals employed throughout project
5 disciplines and future opportunities are available to participate as Project phases
6 advance.

7

8

IV. SUMMARY AND CONCLUSION

9 Q24. PLEASE SUMMARIZE YOUR TESTIMONY.

10 A. To summarize, as an experienced Land Manager and Right of Way professional, I
11 am confident that all reasonable efforts have been and continue to be used to reach
12 landowners and to openly and effectively communicate the Project scope, while
13 also considering unique thoughts, preferences, and feedback for careful
14 consideration in route review and contract negotiations.

15

16 Q25. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

17 A. Yes.

AFFIDAVIT OF WITNESS

STATE OF Texas
COUNTY OF Harris

NOW BEFORE ME, the undersigned authority, personally came and appeared:

SHANNON GWIN

who, after being duly sworn by me, did depose and state that the above and foregoing is her sworn testimony in this proceeding, that she knows the contents thereof, and that the same are true and correct to the best of her knowledge, information and belief.

Shannon Gwin
/ Ms. Shannon Gwin

Subscribed and sworn before me
this 9th day of February, 2023.

[Signature]
NOTARY PUBLIC,
Printed Name: Sylvia Leticia Lopez
My commission expires: 5-12-2024



Shannon B. Gwin

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318-267-8945

shannon.qwin@yahoo.com

EDUCATION:

Winnsboro High School, graduated 1990
Northeast Louisiana University, 1993-94
Certified Right of Way Agent – IRWA
Certified Associate Right of Way Professional - IRWA
Texas Real Estate Commission #4099
Licensed LA Realtor #995700855
Licensed NM Realtor #53949

EMPLOYMENT HISTORY:

Senior Manager - Land
Pattern Energy Group LP
March 2021 to Present

- Manage the overall land campaign on various project
- Work with field teams on overall structure and composition of projects
- Review survey and acquisition data for reporting requirements
- Identify areas of concern and work through resolutions
- Review and monitor budgets and schedule timelines
- Plat and GIS routing review and comparison
- Coordinate with Land Administration for landowner payments
- Assist with landowner meetings when requested

Project Manager (New Mexico)
Percheron, LLC
May 2019 to March 2021

- Project Management for electrical transmission line
- Oversee and manage agents and office personnel
- Assisted in acquisition of option and easement documents
- Weekly reporting to client
- Weekly conference calls with client and engineering
- Monitor and maintain scheduled deadlines
- Work with civil and environmental survey groups
- Plat and GIS routing review and comparison
- Budgeting and account management for payments
- Various management duties



Project Manager (Pennsylvania)

Percheron, LLC

December 2013 to July 2017

- Project Management for over 1000 tracts of property
- Oversee and manage agents and office personnel
- Weekly reporting to client
- Weekly conference calls with client and engineering
- Worked closely with Public Relations department
- Research and review of files for denied permissions
- Research, review and approval of MOC for routing purposes
- Weekly supervisory staff and monthly project-wide meetings
- Monitor and maintain scheduled deadlines
- Work with civil and environmental survey groups
- Plat and GIS routing review and comparison
- Various management duties

Project Manager (Texas/Oklahoma)

Percheron, LLC

May 2013 to November 2013

- Oversee and manage agents and office personnel
- Monitor and approve timesheets for employees
- Generate daily reports for management
- Review tax cards/maps and Vesting Deeds for various tracts
- Pump Station/MLBV Easements and Permitting
- Weekly updates to client regarding progress
- Monitor and log any damages to property owners
- Due diligence of electronic files
- Organize construction schedules with landowners/agents
- Various management duties

ROW Supervisor (Texas/Oklahoma)

Percheron Acquisitions, LLC

February 2012 to May 2013

- Supervise ROW Agents and daily activities
- Monitor and approve timesheets for agents
- Generate daily reports for management
- Review tax cards/maps and Vesting Deeds for various tracts
- Obtained Survey Permissions
- Negotiate and acquire tracts, accesses and MLV locations
- Review and approve agent daily logs
- Client Relations
- Review and approve easement documents
- Various administrative duties

ROW Supervisor (Indiana)
Percheron Acquisitions, LLC
December 2011 to February 2012

- Supervise ROW Agents and daily activities
- Monitor and approve timesheets for agents
- Generate daily reports for management
- Review tax cards/maps and Vesting Deeds for various tracts
- Obtained Survey Permissions
- Review and approve agent daily logs
- Client Relations
- Review and approve easement documents
- Various administrative duties

Right of Way Agent/Title Agent (Louisiana)
Percheron Acquisitions, LLC
January 2010 to December 2011

- Review and red-line agreements for Supervisors
- Generate and review documents
- Generate and maintain various construction reports
- Review and organize completed files
- Review plats and maps from survey
- Work directly with construction/restoration operations
- Various administrative duties assigned by Supervisor
- Perform 30-year surface title in various parishes
- Perform complete title on certain tracts for legal
- Complete miscellaneous company reports
- Negotiations/Acquisitions

Right of Way Agent (Texas)
KW Land Specialists
April 2008 to August 2009

- Negotiated and Acquired Right of Way
- Obtained Survey Permissions from landowner
- Worked with survey crew as liaison for company
- Extensive Title Work
- Obtained current landowner information from CAD Office
- MOC/Re-route plat changes
- Filed completed easements at Clerk's Office
- Compiled miscellaneous company reports
- Purchased valve sites/pump station sites
- Over-sought construction on tracts
- Worked with landowner throughout restoration process

Right of Way Agent II (Pennsylvania)

Northeastern Land Services

January 2008 to March 2008

- Negotiated Right of Way
- Obtained Survey Permissions from landowner
- Worked with survey crew as liaison for company
- Documented mileage of permissions obtained
- Limited Title Work

Treasurer, Office Manager (Louisiana)

Franklin Parish Police Jury, Winnsboro, LA

February 2002 to January 2008

- Obtained right of way permission forms; filed at Clerk's Office
- Scheduled and managed office personnel
- Worked with Tax Assessor regarding adjudicated properties
- Entered accounts payable and payroll
- Compiled and maintained \$10mil budget
- Received and deposited ad valorem taxes by fund
- Compiled and maintained all payroll reports
- Issued building permits for new construction
- Maintained all personnel records
- Applied for/received grant funding on state/federal level
- Lobbied at State Capital in Baton Rouge
- Served as Region 5 Executive Board Member
- Associate Director of Emergency Preparedness for Franklin Parish
- Ex Officio Member, Franklin Parish Economic Development Board
- Maintained records for taxes paid under protest
- Presented accounting reports at monthly public meeting
- General office work