

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF PUBLIC SERVICE)
COMPANY OF NEW MEXICO'S)
ABANDONMENT OF SAN JUAN)
GENERATING STATION UNITS 1 AND 4)

Case No. 19-00018-UT
FILED IN OFFICE OF

AUG 21 2019

IN THE MATTER OF PUBLIC SERVICE)
COMPANY OF NEW MEXICO'S)
CONSOLIDATED APPLICATION FOR)
APPROVALS FOR THE ABANDONMENT,)
FINANCING, AND RESOURCE REPLACEMENT)
FOR SAN JUAN GENERATING STATION)
PURSUANT TO THE ENERGY TRANSITION ACT)

**NM PUBLIC REGULATION COMM
RECORDS MANAGEMENT BUREAU**

Case No. 19-00195-UT

**ORDER ON WRA'S MOTION TO PERMIT
INTERLOCUTORY APPEAL OF ORDER FOR CLARIFICATION**

THIS MATTER comes before the New Mexico Public Regulation Commission ("Commission" or "NMPRC") on Western Resource Advocates' (WRA) July 29, 2019 *Motion to Permit Interlocutory Appeal* of the Commission's July 24, 2019 *Order on Motion for Clarification* ("July 24 Order") addressing WRA's July 22, 2019 *Motion for Clarification and Reconsideration* filed in Case No. 19-00195-UT and Case 19-00018-UT.

WHEREFORE, having considered the pleadings filed by the parties and being duly informed, **THE COMMISSION FINDS:**

1. WRA's current motion seeks an interlocutory appeal to the entire commission from the single signature *July 24 Order* signed by Commission Chair Theresa Becenti-Aguilar. WRA seeks "clarification of whether the Commission intends to apply the ETA in Case 19-00018-UT."

2. WRA's motion recites that it is supported by intervenors Coalition for Clean Affordable Energy (CCAEE), Sierra Club, San Juan Citizen's Alliance, Dine CARE and Public Service Company of New Mexico (PNM). Responsive pleadings in support of WRA's Motion to Permit

Interlocutory Appeal were filed by PNM, Interwest Energy Alliance (“Interwest”) and San Juan County and the City of Farmington.

3. WRA’s motion recites that it is opposed by Southwest Generation Operating Co. (“SWG”), New Energy Economy (“NEE”) and the County of Bernalillo (Bernalillo County). Responsive pleadings opposing WRA’s motion were filed by SWG and NEE.

4. WRA’s motion recites that the New Mexico Attorney General (AG), the Public Regulation Commission Utility Division Staff (STAFF) and the New Mexico Industrial Energy Consumers (NMIEC) took no position on WRA’s motion.

5. Initially, the Commission notes the both WRA’s July 22, 2019 *Motion for Clarification and Reconsideration* and WRA’s current *Motion to Permit Interlocutory Appeal* rely on the incorrect assertion that the Commission “intended” to rule in its July 10, 2019 *Corrected Order on Consolidated Application (“Corrected Order”)* that the Energy Transition Act (ETA) would not apply to that portion of the bifurcated proceedings on PNM’s Consolidated Application assigned to Case 19-00018-UT. WRA seeks confirmation by the Commission that this was its “intended” ruling, apparently so that WRA can seek immediate review by the New Mexico Supreme Court.

6. However, the Commission’s *July 24, 2019 Order* correctly rejected WRA’s view that the Commission had any supposed “intent” to rule as WRA posits and therefore the order found neither substantive clarification of the Commission’s *Corrected Order* nor reconsideration of such “intended” ruling was necessary.

7. WRA’s fundamental premise that the Commission “intended” to rule that the ETA did not apply in its *Corrected Order* is unfounded because it relies entirely on statements by individual commissioners made either during debate or in subsequent comments to the press. As SWG

correctly notes in its response, well-established law provides that oral comments not set forth in the Commission's *Corrected Order* do not constitute a ruling by the Commission.

8. Paragraph 3 of WRA's motion mistakes the import of language of the *July 24 Order*, asserting that the order "stated in paragraphs D and E that the Commission had not decided whether the ETA would apply to PNM's Application." The language at issue responded to WRA's primary assertion that the Commission had intended *to not apply* the ETA. Paragraph D of the *July 24 Order* merely confirmed that the *Corrected Order* had not made any definitive ruling that the ETA did not apply to PNM's Consolidated Application.

9. Consistent with PNM's assertion that "the Commission must presume that the ETA is valid and apply it to the present proceeding," the Commission's July 10 *Corrected Order* has applied the provisions of the ETA notwithstanding the pending issue on whether N.M. Const. Article IV, Section 34 may bar application of the ETA. First, the Commission bifurcated the Consolidated Application into two proceedings in accordance with the ETA. Second, the *Corrected Order* initiated a hearing on PNM's application for issuance of a financing order under the ETA. Third, both cases are being conducted subject to the ETA's time limitations. Fourth, the *July 24 Order* found the protest set forth in WRA's motion to intervene established good cause for a hearing on PNM's application pursuant to the ETA. Finally, paragraph 2 of the July 10 *Corrected Order* highlighted a portion of the January 30, 2019 Order requiring that this proceeding address "all issues relevant to an abandonment proceeding under NMSA 1978, §62-9-5 *and any other applicable statutes and NMPRC rules.*"

10. WRA's insinuations that the Commission Chair acted improperly by treating its motion as a procedural matter are similarly unfounded. WRA's *Motion for Clarification* expressly conditioned its request for clarification, seeking a response only "to the extent it has been

determined that the ETA does not apply.” (emphasis added). As the **July 24 Order** clearly noted, since there was no determination by the Commission that the ETA did not apply, there was no need to issue a substantive clarification. Instead, the Commission sought to resolve WRA’s motion in an expeditious manner by issuing a single signature order under Rule 1.2.2.30 NMRA. WRA’s insinuations of impropriety are belied not only by the very qualifications WRA placed on its motion, but by the express language of Rule 1.2.2.30(B)(3). That rule specifically states: “the chairman of the commission or any other commissioner may issue any procedural orders including orders ... *clarifying the issues to be considered during a proceeding.*” A single signature was both proper and the most expedient means of settling what WRA itself had framed as a procedural issue.

11. The Commission’s **July 24 Order** acknowledged that the Hearing Examiners’ forthcoming procedural schedule would address the issue of whether N.M. Const. Article IV, Section 34 might prevent the application of the ETA to PNM’s abandonment application. N.M. Const. Article IV, Section 34 provides:

No act of the legislature shall affect the right or remedy of either party, or change the rules of evidence or procedure, in any pending case.

At that time, the Hearing Examiners had already conducted a scheduling conference with the parties. The Commission understands that this issue was included in the procedural schedule was at least partly at the request of WRA following discussion of the issue at the Commission’s July 10 open meeting.

12. By way of background, the potential applicability of N.M. Const. Article IV, Section 34 has been a known issue in this case since WRA and CCAE first raised it in their January 18, 2019 Responses to the Commission’s January 10, 2019 **Order Requesting Response to PNM’s December 31, 2018 Verified Compliance Filing Concerning Continued Use of San Juan**

Generating Station to Serve New Mexico Customers Pursuant to Paragraph 19 of the Modified Stipulation in Case 13-00390-UT.

13. Paragraph 19 of the Modified Stipulation was approved as part of the December 15, 2015 ***Final Order*** in Case 13-00390-UT which granted PNM authorization to abandon San Juan Generating Station Units 2 & 3. This was well prior to PNM's first effort during the 2018 legislative session to pass SB 47, which sought to change the law applicable to PNM's possible recovery of undepreciated or "stranded" investments in SJGS upon abandonment. The ***Final Order*** required PNM to make a filing between July 1, 2018 and no later than December 31, 2018, complete with "supporting testimony and exhibits," so that an expedited "Review Hearing" could address the extent to which SJGS would continue to serve New Mexico retail customers. Consistent with § 62-9-5 and principles of due process, the scope of the Review Hearing was intended to provide both the opponents and proponents of either PNM's proposed continued use or proposed abandonment of SJGS a meaningful opportunity to present their respective positions. The Modified Stipulation contemplated initiating and completing the Review Hearing within six months.

14. PNM made the required filing on December 31, 2018 - the last permissible day; notwithstanding that it had effectively initiated abandonment on June 29, 2018 - almost six months prior - by giving notice to the other SJGS owner-participants that it did not intend to continue use of SJGS. PNM's steps in furtherance of abandonment became essentially irrevocable when substantially all of its co-owners, with the exception of the City of Farmington, also provided notice of their intention to abandon SJGS — the last giving notice by July 26, 2018.

15. Because Paragraph 19 of the Modified Stipulation contemplated that PNM would make a substantive filing supported by testimony and exhibits that would initiate the Review Hearing and

because under §62-9-5 NMSA, approval that *any* portion of capacity at SJGS would no longer serve retail customers would constitute an abandonment, the Modified Stipulation required PNM to issue an all resource request for proposals (RFP) and identify replacement resources in time for the Review Hearing. The Final Order required: “This work will be completed in advance of PNM making the filing required by the final order in Case No. 13-00390-UT on the extent to which SJGS should continue serving PNM’s retail customers’ needs after June 30, 2022.”

16. Yet, PNM’s December 31, 2018 filing did not include its application for abandonment as contemplated. Instead, PNM requested that the Commission relieve it from its obligation under the Modified Stipulation to conduct the expedited Review Hearing, stating: “Because PNM is not proposing to enter into any agreements that would extend the operation of SJGS beyond 2022, PNM is not requesting any formal approvals or determinations from the Commission in this filing. PNM requests only that the Commission accept this Compliance Filing in fulfillment of the filing requirement in Paragraph 19 of the Modified Stipulation and allow this docket to remain closed.”

17. PNM subsequently asserted that notwithstanding that it issued an RFP for replacement resources and gave its commitment under the Modified Stipulation to complete its review in time for the Review Hearing, it was not ready to apply for abandonment. PNM claimed that it had not completed its review of the RFP results and needed to further negotiate with its SJGS co-owners concerning closing obligations.

18. Recognizing the need for an expedited hearing, as contemplated by the Modified Stipulation, the Commission took its first opportunity to consider what PNM now called its “compliance” filing. The Commission did not rush to judgment, but issued an order at the Commission’s first meeting of its newly-elected commissioners on January 10, 2019 requesting the positions of the parties in cases 13-00390 and 17-00174-UT prior to ruling on PNM’s request

to accept the December 31, 2018 Filing as a “compliance” filing in lieu of the expected substantive filing.

19. The majority of parties responding to PNM’s request to delay the Review Hearing opposed PNM’s request. These included the New Mexico Attorney General (AG), PRC Utility Division staff (Staff), the Albuquerque Bernalillo Water Utility Authority (ABCWUA), the New Mexico Industrial Energy Consumers (NMIEC), New Energy Economy (NEE), Southwest Generation Operating Company (SWG), and the San Juan County Entities (comprised of the Board of County Commissioners for the County of San Juan, the City of Farmington, and certain San Juan legislative representatives) (the “SJC Entities”).

20. Only three parties supported PNM’s request to not conduct the Review Hearing. These included the same parties who supported PNM’s efforts to legislatively change the law applicable to PNM’s abandonment through the passage of HB 489 – the Sierra Club, the Coalition for Clean Affordable Energy (CCAЕ) and Western Resources Advocates (WRA). While PNM had asserted that initiation of an abandonment proceeding might conflict with legislative energy policy initiatives that would be introduced in the legislative session, WRA and CCAЕ’s responses for the first time explicitly raised the possible application of the protective bar against applying legislation to affect the rights of litigants in pending cases set forth in N.M. Const. Article IV, Section 34. WRA and CCAЕ asserted the Commission’s motivation in initiating the case was to preclude legislative action with CCAЕ noting: “such a strategy and argument was advocated by some parties to this case, such as New Energy Economy, with regard to legislation last year.” WRA and CCAЕ made this argument notwithstanding that PNM’s own filing had invoked the Commission’s authority on whether PNM might be relieved from the Final Order’s requirement to conduct the expedited Review Hearing on its proposed abandonment and despite the fact that the

Commission's action initiating this case was supported by the majority of the other parties in the case.

21. Once WRA and CCAE raised these concerns that applying the ETA to PNM's abandonment application might contravene Article IV, Section 34 of the New Mexico Constitution, the Commission has recognized the need to resolve this critical legal issue consistent with its statutory duty to balance the interests of the utility and ratepayers. At the Commission's July 10 open meeting, the Commission voted to bifurcate this proceeding into two cases – placing the abandonment and financing applications into the existing 19-00018-UT docket apprised that in doing so it was applying the ETA in bifurcating the case and setting timeframes. The Commission felt placing the abandonment and financing issues in the 19-00018-UT docket was the most appropriate means to raise and resolve the constitutional issue.

22. The manner in which the Commission has sought to address this issue has become subject of much misunderstanding and misinformation. Some apparently have been led to believe the Commission can and must simply make an off-the-cuff ruling today. However, such a perfunctory ruling would be contrary to principles of due process requiring the Commission to give the parties an opportunity to be heard. Despite its request that the Commission simply confirm an "intended" ruling, even WRA appears to recognize the need for due process by calling for an expedited briefing schedule in its Motion for Clarification.

23. The Commission must address this issue in a manner consistent with the due process rights of all parties. This includes those parties arguing each side of the issue. Therefore, the Commission's *July 24 Order* properly rejected WRA's unsupported assertion that there are no factual issues in dispute, as well as its demand that the Commission deviate from its established

rules of procedure by establishing a rushed one-week simultaneous briefing schedule that would deprive the parties an opportunity to file responsive briefs.

24. Instead, the Commission delegated authority to its Hearing Examiners to address any legal issues that may arise in the case. The Hearing Examiners have issued a procedural order designed to address the possible implications of Article IV, Section 34 in this case. As PNM's response notes, due process requires a "meaningful" opportunity to be heard and "due process safeguards are particularly important in administrative agency proceedings because many of the customary safeguards a court provides may be foregone or relaxed in the interest of expedition and a supposed administrative efficiency."

25. As SWG notes in its response, the true focus of WRA's interlocutory motion appears to not be the Commission's *July 24 Order*, but the Hearing Examiners' July 25, 2019 Procedural Order which provides not only an opportunity to file briefs on the issue of the extent to which N.M. Const. Article IV, Section 34 may prevent the application of the ETA to PNM's abandonment application, but also to file related supplemental testimony establishing necessary facts in support of any legal argument. PNM's brief and supplemental testimony is due on August 23, 2019.

26. SWG posits that by requiring the parties to file testimony establishing a full evidentiary record on both legal scenarios – one applying the ETA and the other not, the Hearing Examiners' Procedural Order provides a number of advantages. SWG asserts it would hedge against potential prejudice to the parties' ability to create a full record within the available timeframe under the ETA, given the likelihood that any determination on the applicable law would become the subject of immediate appellate scrutiny with resultant delays to the proceedings.

27. This is an important consideration given that PNM declined the Hearing Examiners' offer to modify the dual issue schedule if PNM agreed to toll the applicable time limits of the ETA in order to permit unconstrained consideration of the legal issues concerning N.M. Const. Article IV, Section 34.

28. The Commission understands the movants' position that the issue of whether Section IV, Art. 34 applies to bar application of the ETA should be settled at the earliest opportunity to prevent confusion and double work. It will also allow for more cogent pro-se intervention and public comment, thereby benefiting all interested parties.

29. However, the Commission also recognizes that unless PNM agrees to toll or stop the clock until that determination can be made, the Commission simply will not have enough time to fairly consider the issues and meet its statutory duty to balance the interests of the utility and ratepayers.

30. WRA and PNM's insistence that the Commission must settle the applicable law issue without accommodating the Commission's need for adequate time to also properly afford the parties sufficient opportunity to develop a full evidentiary record on all issues in this docket, including the applicable law issues, leaves the Commission no other choice than to conclude that the movants may be intentionally exploiting this issue to restrict the Commission's ability to scrutinize PNM's application thoroughly.

31. While the movants assert rushing the ETA determination will save time, the Commission notes that a rushed process does not serve the public interest because it will restrict the Commission's ability to afford all parties due process and is more likely to create additional and unforeseen legal issues.

32. In the event PNM reconsiders its refusal of the hearing examiners' request and agrees to toll the statutory deadlines applicable to its applications to permit full review of the applicable law

issue, the Commission will issue a revised order amending this order, suspending the Procedural Schedule's provisions concerning the substantive issues relating to PNM's applications and implementing a process to determine in an expedient fashion consistent with due process whether Section IV, Art. 34 of the New Mexico Constitution bars application of ETA to PNM's application. This process will enable the Commission and the parties to develop a sufficient record for the Supreme Court to properly consider the issue of the applicable law if appealed without compromising the parties' opportunity to develop a record on the substantive issues relating to PNM's applications. Tolling of the statutory deadlines would end immediately upon the earlier of the following: (i) upon the expiration of the time under NMSA 1978, section 39-3-4(B) for requesting an order from the New Mexico Supreme Court allowing interlocutory appeal of the Commission's decision on the applicability of the ETA and no such request has been filed with New Mexico Supreme Court, or (ii) upon issuance of a decision from the New Mexico Supreme Court in the event an appeal is taken from any Commission determination concerning the applicable law issue.

33. PNM shall make a filing by 4:00 PM Friday August 23, 2019 indicating whether it agrees to toll the applicable statutory deadlines.

34. If PNM refuses to toll the applicable statutory deadlines, the Commission must reject WRA's motion seeking relief from the Hearing Examiners' Procedural Order. WRA's current motion only seeks an interlocutory appeal of the **July 24 Order** and it has not complied with the requirement of Rule 1.2.2.31(A) NMRA that a movant seeking interlocutory appeal to the Commission must first file a motion to permit interlocutory appeal with the presiding officer whose decision the movant seeks to appeal.

IT IS THEREFORE ORDERED:

A. Upon consideration of WRA's interlocutory appeal, the Commission declines WRA's request that it modify the *July 24, 2019 Order on Motion for Clarification* issued by the Commission Chair.

B. PNM shall make a filing by 4:00 PM Friday August 23, 2019 indicating whether it agrees to toll the applicable statutory deadlines.

C. In the event PNM agrees to toll the statutory deadlines applicable to its applications in order to permit review of the applicable law issue, the Commission will issue a subsequent order revising its current order, suspending the Procedural Schedule's provisions concerning the substantive issues relating to PNM's applications and implementing a process to determine in an expedient fashion whether Section IV, Art. 34 of the New Mexico Constitution bars application of the ETA to PNM's application as indicated above.

D. To the extent WRA's Motion for Interlocutory Appeal seeks relief from the Hearing Examiners' July 25, 2019 Procedural Order, that motion is denied due to WRA's failure to comply with Rule 1.2.2.31(A) NMRA.

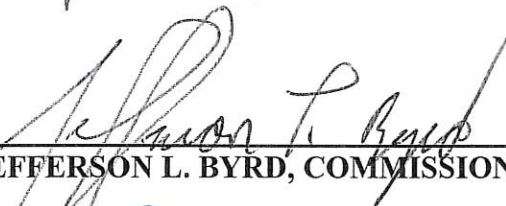
E. This Order is effective immediately.

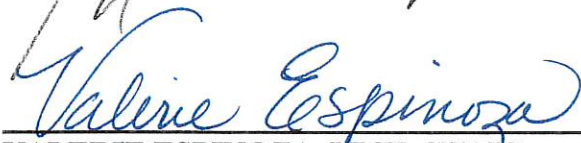
F. Copies of this Order shall be served on all persons listed on the attached Certificate of Service, via e-mail to those whose e-mail addresses are known, and otherwise via regular mail.

ISSUED under the Seal of the Commission at Santa Fe, New Mexico, this 21st day of
August 2019.

NEW MEXICO PUBLIC REGULATION COMMISSION


CYNTHIA B. HALL, COMMISSIONER


JEFFERSON L. BYRD, COMMISSIONER


VALERIE ESPINOZA, VICE-CHAIR


THERESA BECENTI-AGUILAR, CHAIR


STEPHEN FISCHMANN, COMMISSIONER



BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF PUBLIC SERVICE)
COMPANY OF NEW MEXICO'S)
ABANDONMENT OF SAN JUAN)
GENERATION STATION UNITS 1 AND 4)**

Case No. 19-00018-UT

CERTIFICATE OF SERVICE

I CERTIFY that on this date I sent to the parties and individuals listed here, via email only, a true and correct copy of the **Order on WRA's Motion to Permit Interlocutory Appeal of Order for Clarification**, issued on August 21, 2019.

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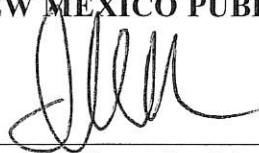
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DATED this August 21, 2019.

NEW MEXICO PUBLIC REGULATION COMMISSION



Isaac Sullivan-Leshin, Paralegal

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF PUBLIC SERVICE)	
COMPANY OF NEW MEXICO'S)	
CONSOLIDATED APPLICATION FOR)	Case No. 19-00195-UT
APPROVALS FOR THE ABANDONMENT)	
FOR SAN JUAN GENERATING STATION)	
PRUSUANT TO THE ENERGY)	
TRANSITION ACT)	

CERTIFICATE OF SERVICE

I CERTIFY that on this date I sent to the parties and individuals listed here, via email only, a true and correct copy of the **Order on WRA's Motion to Permit Interlocutory Appeal of Order for**

Clarification, issued August 21, 2019.

<u>Stacey Goodwin</u> <u>Ryan Jerman</u> <u>Richard Alvidrez</u> <u>Dan Akenhead</u> <u>Mark Fenton</u> <u>Carey Salaz</u> <u>Steven Schwebke</u> <u>Ray Gifford</u> <u>Heather Allen</u> <u>Joan Drake</u> <u>Lisa Tormoen Hickey</u> <u>Jason Marks</u> <u>Matthew Gerhart</u> <u>Katherine Lagen</u> <u>Ramona Blaber</u> <u>Camilla Feibelman</u> <u>Michael Goggin</u> <u>Nann M. Winter</u> <u>Keith Herrmann</u> <u>Dahl Harris</u> <u>Peter Auh</u> <u>Jody Garcia</u> <u>Andrew Harriger</u> <u>Steven S. Michel</u> <u>Glenda Murphy</u> <u>April Elliott</u> <u>Pat O'Connell</u> <u>Douglas J. Howe</u> <u>Mariel Nanasi</u> <u>Aaron El Sabrout</u> <u>Bruce C. Throne</u> <u>Rob Witwer</u> <u>Jeffrey Albright</u> <u>Amanda Edwards</u> <u>Michael I. Garcia</u> <u>Greg Sonnenfeld</u> <u>Ned Parker</u>	<u>Stacey.Goodwin@pnmresources.com;</u> <u>Ryan.Jerman@pnmresources.com;</u> <u>Ralvidrez@mstlaw.com;</u> <u>DAkenhead@mstlaw.com;</u> <u>Mark.Fenton@pnm.com;</u> <u>Carey.salaz@pnm.com;</u> <u>Steven.Schwebke@pnm.com;</u> <u>Rgifford@wbklaw.com;</u> <u>Heather.Allen@pnmresources.com;</u> <u>jdrake@modrall.com;</u> <u>lisahickey@newlawgroup.com;</u> <u>lawoffice@jasonmarks.com;</u> <u>matt.gerhart@sierraclub.org;</u> <u>Katherine.lagen@sierraclub.org;</u> <u>Ramona.blaber@sierraclub.org;</u> <u>Camilla.Feibelman@sierraclub.org;</u> <u>MGoggin@gridstrategiesllc.com;</u> <u>nwinter@stelznerlaw.com;</u> <u>kherrmann@stelznerlaw.com;</u> <u>dahlharris@hotmail.com;</u> <u>pauh@abcwua.org;</u> <u>JGarcia@stelznerlaw.com;</u> <u>akharriger@sawvel.com;</u> <u>smichel@westernresources.org;</u> <u>gmurphy@westernresources.org;</u> <u>April.elliott@westernresources.org;</u> <u>pat.oconnell@westernresources.org;</u> <u>dhowe@highrocknm.com;</u> <u>Mariel@seedsbeneaththesnow.com;</u> <u>Aaron@newenergyeconomy.org;</u> <u>bthroneatty@newmexico.com;</u> <u>witwer@southwestgen.com;</u> <u>JA@Jalblaw.com;</u> <u>AE@Jalblaw.com;</u> <u>mikgarcia@bernco.gov;</u> <u>gsonnenf@gmail.com;</u> <u>edwardgparker88@gmail.com;</u>	<u>Stephen Curtice</u> <u>Barry W. Dixon</u> <u>Shane Youtz</u> <u>Kyle J. Tisdell</u> <u>Erik Schlenker-Goodrich</u> <u>Thomas Singer</u> <u>Mike Eisenfeld</u> <u>Carol Davis</u> <u>Robyn Jackson</u> <u>Germaine R. Chappell</u> <u>Jane Yee</u> <u>Saif Ismail</u> <u>Steven Gross</u> <u>Martin R. Hopper</u> <u>James R. Dittmer</u> <u>Daniel R. Dolan</u> <u>Robb Hirsch</u> <u>Noah Long</u> <u>Mariam Wheir</u> <u>John W. Boyd</u> <u>Joseph A. Herz</u> <u>Caitlin Liotiris</u> <u>Kathleen Fraser</u> <u>Jim Dauphinais</u> <u>Brian Andrews</u> <u>Thomas Manning</u> <u>Chris Hunter</u> <u>Josh Finn</u> <u>A. Peters</u> <u>Donald E. Gruenemeyer</u> <u>Marcos D. Martinez</u> <u>Senator Steve Neville</u> <u>Rep. James Strickler</u> <u>Anthony Allison</u> <u>Senator Carlos Cisneros</u> <u>Senator William Sharer</u> <u>Rep. Rod Montoya</u>	<u>stephen@youtzvaldez.com;</u> <u>bwdixon953@msn.com;</u> <u>shane@youtzvaldez.com;</u> <u>tisdell@westernlaw.org;</u> <u>eriksg@westernlaw.org;</u> <u>Singer@westernlaw.org;</u> <u>mike@sanjuancitizens.org;</u> <u>caroljdavis.2004@gmail.com;</u> <u>chooshgai.bitsi@gmail.com;</u> <u>Gchappelle.law@gmail.com;</u> <u>jyee@cabq.gov;</u> <u>sismail@cabq.gov;</u> <u>gross@portersimon.com;</u> <u>mhopper@msrpower.org;</u> <u>jdittmer@utilitech.net;</u> <u>drd@lobo.net;</u> <u>rhirsch@edlconsulting.us;</u> <u>nlong@nrdc.org;</u> <u>mwheir@gmail.com;</u> <u>jwb@fbdlaw.com;</u> <u>jaherz@sawvel.com;</u> <u>ccollins@energystrat.com;</u> <u>kfraser@energystrat.com;</u> <u>jdauphinais@consultbai.com;</u> <u>bandrews@consultbai.com;</u> <u>cfreecleanenergy@yahoo.com;</u> <u>Chris@cornerstoneresults.com;</u> <u>Joshua.finn@navajopower.com;</u> <u>apeters@wbklaw.com;</u> <u>degruen@sawvel.com;</u> <u>mdmartinez@santafenm.gov;</u> <u>steven.neville@nmlegis.gov;</u> <u>jamesstrickler@msn.com;</u> <u>Anthony.Allison@nmlegis.gov;</u> <u>Carlos.cisneros@nmlegis.gov;</u> <u>bill@williamsharer.com;</u> <u>roddmontoya@gmail.com;</u>
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