

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF PNM’S ELECTRIC)
INTEGRATED RESOURCE PLAN FOR THE)
PERIOD 2020-2040 IN COMPLIANCE WITH) Case No. 21-00033-UT
NMAC 17.7.3.9)
_____)**

**FINAL ORDER ADOPTING STAFF’S RECOMMENDATION
TO ACCEPT PNM’S IRP AS UPDATED**

THIS MATTER comes before the New Mexico Public Regulation Commission (the “Commission” or the “NMPRC”) the Commission’s April 6, 2022 Order requiring Public Service Company of New Mexico (“PNM”) to update its Integrated Resource Plan for the period of 2020-2040 in compliance with 17.7.3.9 NMAC; upon PNM’s Update filed on April 27, 2022; and upon Staff’s Updated Recommendation filed on June 29, 2022; whereupon, being duly informed,

THE COMMISSION FINDS AND CONCLUDES:

1. On January 29, 2021, Public Service Company of New Mexico (“PNM”) filed its 2020-2040 Integrated Resource Plan (“IRP”).
2. On February 10, 2021, a Joint Motion was filed which requested a variance from Section 17.7.3.12 NMAC of the Commission's Integrated Resource Planning Rule. The Joint Motion stated that the variance was needed to ensure the Commission and stakeholders in PNM’s 2021 IRP Public Advisory Process have an adequate opportunity “to evaluate and provide input” on PNM’s 2020-2040 Integrated Resource Plan (“IRP”) docketed as Case 20-00033- UT and requested an evidentiary hearing.
3. On February 14, 2021, the Commission issued its Order on Joint Motion for Evidentiary Hearing which denied the Joint Motion; granted a variance of the time frame

provided by 17.7.3.12 NMAC for the submission of public comments, utility responses and Utility Division Staff's recommendations and confirmation of its position as to the reasonableness of PNM's model inputs and assumptions to permit further review of PNM's IRP and for performance of modelling; and appointed Robert Lennon as hearing examiner to conduct a scheduling conference(s) and issue orders on information access, including the need for any protective orders, to facilitate access to PNM's modeling data and software pursuant to the process in Case No. 19-00195-UT, and to establish deadlines for the completion of the alternative modeling, the filing of comments, response comments and for Staff to perform and complete its review and recommendations pursuant to 17.7.3.12 NMAC.

4. On April 6, 2022, the Commission issued an Order, pursuant to 17.7.3.10 NMAC, which required PNM to promptly notify the Commission and participants of materials events that would have the effect of changing the results of its IRP had those events existed when the IRP was developed and requires PNM to update its IRP to reflect the changes in the IRP resulting from the material events.¹

5. The April 6th Order found that material events have occurred since PNM developed its IRP filed in this docket as follows: a) the Commission's February 23, 2022 Order in Case No. 19-00018-UT² resulted in PNM's continued operation of SJGS until September

¹ 17.7.3.10 NMAC states: "OBLIGATION TO NOTIFY OF MATERIAL CHANGES AND UPDATE ACTION PLAN: The utility shall promptly notify the commission and participants of material events that would have the effect of changing the results of the utility's IRP had those events been recognized when the IRP was developed. As part of this notification, the utility shall explain how this event(s) has changed the action plan."

² See Paragraphs 34 and 35 of the February 23, 2022 Order setting forth the material events: "34. While an evidentiary hearing is not required on PNM's Request to extend the operation of SJGS 4, the parties' opportunity to conduct discovery related to their concerns about the prudence and reasonableness of PNM's decisions and possible resulting costs should not be delayed until the contemplated rate proceeding takes place. PNM's determination to extend the use of SJGS 4 is intended to alleviate PNM's issues in securing enough capacity to meet Summer 2022 peak. The extended use of SJGS 4 will not resolve the underlying issues related to the supply chain issues that have caused the vendors of the replacement resources approved in Case 19-00195- UT to default and invoke the force majeure clauses in their contracts. There are ongoing concerns about PNM's ability to meet the 2023 Summer peak notwithstanding PNM's belief that the replacement resources will be online by then, given that the Rockmont Project remains in default and a substitute resource may need to be approved. 35. While PNM has made compliance filings related to these

2022, and upon PNM's statements made in both its November 2021 and January 2022 Compliance Notices filed in Case No. 20-00182-UT, which both reported that some of PNM's anticipated replacement resource PPAs would not be ready by the June 2020 (date agreed to come on line) and the declaration of default due to force majeure and pandemic-related supply chain shortages. The Order ruled that these events constituted a material change that required PNM provide notice and an update to the IRP filed in this docket.

6. On April 27, 2022, PNM filed an update to its IRP in this docket ("April 27th Update") which included updated loads and resources tables and other tables, contained in the IRP, and an update of all other relevant portions of the IRP, to explain the material events that have occurred since the IRP was developed. PNM stated its Update explained the projected changes to the IRP due to the default and the invocation of force majeure by the anticipated replacement generation for SJGS and due to the Order in Case No. 19-00018-UT. PNM stated on page 2 of the April 27th Update, "PNM notes that the longer-term impacts of the recent material events identified by the Commission and discussed in the Second Addendum will be analyzed and encompassed in the recently initiated 2022-2023 public advisory process for PNM's 2023 IRP." PNM's April 27th Update provides its Notice of Material Event regarding the global supply chain delays affecting the projects the Commission approved to replace the San Juan coal plant and the leases in the Palo Verde nuclear plant that PNM proposes to end. In addition, the April 27th Update what it has done to remedy the San Juan replacement project delays such as: extending the life of Unit 4 of the San Juan coal plant through September 2022; issued market RFPs that failed to produce any bids for resources that would be timely and

replacement resources in the dockets for Cases 20-00182-UT and 19-00195-UT, the parties responding to PNM's compliance filings have raised a number of questions and concerns, they have not had the opportunity to engage in discovery and pose requests to PNM directly."

materially effective; and entering into contracts with neighboring entities including Tri-State Generation and Transmission Association ("Tri-State"), El Paso Electric Company ("EPE"), and Uniper (regarding the Four Corners coal plant). Based upon these efforts, PNM asserted that it has been able to acquire generation to replace the delayed San Juan replacement projects for Summer 2022. PNM also asserted it is pursuing remedies for Summer 2023 and is reporting progress bi-monthly. PNM's Update did acknowledge that transmission constraints are a key critical impediment to market resource access: "[w]hile some utilities may have some additional capacity, transmission constraints have rendered some of those potential resource transactions infeasible," and "[t]he most significant hurdle to [resource] options is the availability of transmission resources and available transmission interconnection rights to facilitate the shortened timeframe."³ PNM also explained that there were specific constraints regarding access to resources located on the Eastern grid across AC-DC converters but did not specifically address other transmission constraints.

7. On June 8, 2022, the Commission issued an Order that stated that, no later than June 15, 2022, the parties to this matter may file written Responses to PNM's April 27th Update; no later than June 22, 2022, PNM may file its Reply to any Responses; no later than June 29, 2022, Staff shall file its update to its Recommendation filed in this docket on November 21, 2022, updating all sections of that Recommendation, in light of PNM's April 27th Update, responding to any filed Responses and PNM's Reply to Responses.

8. On June 15, 2022, New Mexico Affordable Reliable Energy Alliance ("NM AREA") filed its Comments and Recommendations and stated that the Commission should accept PNM's 2020 IRP and adopt NM AREA's Initial Comments recommendations that were

³ April 27th Update, page 6.

filed on September 30, 2021 because, although Commission acceptance of PNM's 2020 IRP does not bind either PNM or the Commission, the assumptions that PNM used in developing its 2020 IRP are critical as they provide the basis for how the PNM plans to operate, and add to, its system on a going-forward basis. On September 30, 2021, NM AREA stated: "PNM's IRP in this docket provides a clear, but generally flexible, pathway toward achieving its 2040 carbon emissions-free goal and also meeting the other requirements of the ETA. Additionally, NM AREA appreciated the conservative approach PNM has taken in its resource modeling with respect to its overall goal of reducing carbon emissions from its generation facilities on an ongoing and consistent basis." Also on September 30, 2021, NM AREA recommended that the Commission require PNM to address six issues in its subsequent resource acquisition cases and in its next IRP as follows: (1) transmission planning; (2) market assistance import limits related to LOLP studies and the reliability of the Most Cost Effective Plans ("MCEP"); (3) regional opportunities for reserve pooling coordination; (4) quantification and modeling the risks of extreme weather events; (5) diversity values of wind, solar, and storage resources; and; (6) cost assumptions. In its June 15th filing, NMAREA stated that out of these 6 recommendations, the most critical issue remains transmission planning because the development of a comprehensive transmission plan is an essential component of identifying the most feasible resource options and determining the MCEP as stated in the Commission's authority under its current IRP Rule to require PNM to develop a comprehensive transmission plan as part of its next IRP filing. NMAREA pointed out that the factors listed in PNM's Second Addendum relating to the failures of its planned projects to come on line in a timely manner make transmission planning more, not less, important. In addition, NMAREA informed that PNM is already in the process of developing its 2023 IRP and, for this reason, PNM needs guidance and direction from the

Commission in order to make the 2023 IRP, and particularly PNM's next four-year action plan, as resilient and robust as possible. For these reasons, NM AREA recommended that the Commission issue a final order in this docket as soon as practicable in which it adopts some, if not all, of NM AREA's proposals, to improve the PNM's planning process so that PNM can move on from PNM's 2020 IRP and focus their attention on ensuring that PNM has an adequate plan in place to meet its summer 2023 peak needs.

9. On June 15, 2022, Interwest Energy Alliance ("Interwest") filed its Response Comments to PNM's April 27th Update. Interwest's Initial Comments on PNM's MCEP and Four-year Action Plan stated that Interwest disagreed that the Technology Neutral portfolio, which includes fossil fuel generation as a key investment, appropriately positions PNM for transition to carbon-free resources or is consistent with the ETA. Interwest recommended that the Commission reject this portion of PNM's Four-Year Action Plan, and instead accept and approve the No New Combustion portfolio as the MCEP, require submittal of a modified Four-Year Action Plan to implement that portfolio in the near term, and require PNM to implement the corrections noted in Interwest's expert's white paper in its IRP modeling going forward. Regarding PNM's April 27, 2022 Update and Additions to its Four Year Action Plan, Interwest stated that, despite identifying transmission constraints as key impediments in its April 27th Update and other PNM's Compliance filings⁴, PNM did not propose any change to its long-term plans, and made only two additions to its Four Year Action Plan regarding maintaining system supply and reliability, as follows: i) Explore and execute options to address short-term resource adequacy issues caused by renewable project disruptions and ii) Assess longer term impacts of

⁴ In a recent Commission compliance filing PNM stated "[a]ll transmission lines leading into PNM's load center are fully subscribed." PNM's May 2022 San Juan Resources Compliance Notice, filed in Case Nos. 19-00195-UT and 20-00182-UT. Also, see, PNM Update's at 9.

renewable project disruptions on PNM's supply portfolio through future regulatory filings including PNM's 2023 Integrated Resource Plan. Interwest stated that it agreed that PNM must continue to explore and execute options to address short-term adequacy needs resulting from project delays due to the pandemic and global supply chain issues. Regarding transmission planning, that while Interwest agreed with PNM that transmission constraints are a key impediment to resource acquisition and flexibility important to maintain reliability, Interwest did not agree that PNM should continue to push to the future consideration of this critical issue. Instead, Interwest recommended to the Commission that PNM's Four-Year Action Plan should include specific actions to identify and assess transmission constraints in all directions.

10. On June 29, 2022, Utility Division Staff (“Staff”) of the Commission filed its Updated Recommendation which stated that pursuant to the Integrated Resource Plan (“IRP”) Rule⁵, it has reviewed PNM’s IRP, the subsequently filed Erratas, and PNM’s April 27th Update for compliance with the IRP Rule using the criteria set forth in 17.7.3.9 NMAC as well as the requirements set in the April 6th Order. Staff has also reviewed Responses filed to PNM’s April 27th Update.

11. In Staff’s Updated Recommendation, Staff, at the outset, stated that it believed that it is important for the Commission to consider that PNM’s next IRP is scheduled to be filed in 2023 and the public advisory process has already been initiated.

12. Staff’s conclusions were as follows: i) PNM met the requirements of 17.7.3.9 B NMAC – Contents of IRP for electric utilities; ii) PNM met the requirements of 17.7.3.9 C

⁵ 17.7.3.12 NMAC states: “The Commission’s utility division staff shall review the utility’s proposed IRP as filed and shall consider the filed written public comments in support or in opposition and the utility’s written response and shall file a written recommendation to the commission within 60 days of utility’s filing as to whether or not the IRP complies with the procedures and objectives of this rule and whether or not it recommends that the commission accept the IRP as filed. 17.7.3.12 NMAC.” Staff correctly noted that the deadlines set forth in the IRP Rule, which have been substantially modified in response to significant occurrences as documented in the record in this docket, have been changed to the current schedule in Ordering Paragraph C of the June 9th Order

NMAC - Description of Existing Resources, because it updated and clarified specific issues identified as lacking clarity in the originally filed IRP document; iii) PNM met the requirements 17.7.3.9 D NMAC - Current Load Forecast because it updated and clarified specific issues identified as lacking clarity in the originally filed IRP document; iv) PNM met the requirements of 17.7.3.9 E NMAC - Load and Resources Table because it updated and clarified specific issues identified as lacking clarity in the originally filed IRP document; however, Staff noted that if a further update is required leading into the summer of 2023, it would be more helpful to have that update be provided in the first quarter of 2023; v) PNM met the requirements 17.7.3.9 F NMAC - Identification of resource options. because it updated and clarified specific issues identified as lacking clarity in the originally filed IRP document; vi) PNM met the requirements 17.7.3.9 G NMAC - Determination of the most cost-effective resource portfolio and alternative portfolios because it updated and clarified specific issues identified as lacking clarity in the originally filed IRP document. Specifically, Staff stated that PNM's April 27th Update focused on meeting the shortfalls anticipated for the summer of 2022 due to the significant, unforeseen material events. Staff asserted that a more fully considered most cost-effective portfolio and alternative portfolios are expected to be presented in the upcoming 2023 IRP in accordance with the current IRP Rule; vii) PNM met the requirements 17.7.3.9 H NMAC – Public advisory process and noted that the public advisory process has started for PNM's 2023 IRP; viii) PNM met the requirements 17.7.3.9 I NMAC – Action plan. because it updated and clarified specific issues identified as lacking clarity in the originally filed IRP document. Staff stated that if a further update is required for the summer of 2023, it would be more helpful to have that update provided in the first quarter of 2023; ix) Requirements of the Case No. 16-00276-UT Modified Revised Stipulation. Staff maintains that whether or not PNM has met the requirements of this Stipulation, should not be a

reason to delay the acceptance of this IRP. Staff referred the Commission to the extensive discussion of this issue, as set out in the Initial Comments filed by parties in this case as well as the original Staff's Recommendation which was filed November 12, 2021.

13. Regarding the comments by parties filed after PNM's April 27th Update, Staff stated that it had reviewed Responses filed by New Mexico Affordable Reliable Energy Alliance ("NM AREA") and Interwest Energy Alliance ("Interwest").

14. According to Staff's Updated Recommendation, NM AREA's final recommendation is that the Commission should, "accept PNM's 2020 IRP, adopt NM AREA's recommendations to improve the Company's planning process and grant such other relief as is just and reasonable." Staff noted that NM AREA makes a number of specific suggestions which they believe would improve PNM's planning processes in the future.

15. In PNM's Reply to the Response of NM AREA, PNM maintained that none of the issues raised by NM AREA represent a failing to meet the requirements of either the IRP Rule or the Commission's April 6th Order. PNM stated that, "The transmission-related issues raised by NM AREA and Interwest are better suited for a rulemaking since they apply to all electric utilities."

16. Staff's position on the Response of NM AREA is that Staff does not believe that any of the issues identified by NM AREA represent a failing of PNM to meet the requirements of either the existing IRP Rule or the Commission's April 6th Order. Staff concludes that the recommendations NM AREA makes to improve future planning would be most correctly addressed in the ongoing IRP Rulemaking in Case No. 21-00128-UT.

17. Staff stated that Interwest generally concurred with the specific measures identified as necessary in PNM's April 27th Update. Specifically, to "continue to explore and

execute options to address short-term adequacy needs resulting from project delays due to the pandemic and global supply chain issues” . Interwest does, however, eventually conclude that the Commission should find and conclude that PNM’s IRP, as updated, is not sufficient. Interwest first recommends that PNM be required to submit to the Commission as soon as possible amendments to existing resource supply agreements or new agreements or resource proposals. Second, Interwest recommends that the Commission add a number of specific requirements to be included in a future IRP, largely focused on transmission planning.

18. PNM’s Reply to Responses of Interwest maintained that none of the issues raised by Interwest represent a failing to meet the requirements of either the IRP Rule or the April 6th Order. PNM states that, “The transmission related issues raised by NM AREA and Interwest are better suited for a rulemaking since they apply to all electric utilities.”

19. Staff’s position on the Response of Interwest is that it did not believe the issues identified by Interwest represent a failing by PNM to meet the specific requirements of either the current IRP Rule or the April 6th Order. Staff maintained that some of the issues have been addressed in the Initial Comments of Interwest and the previously filed Staff’s Recommendation. Staff maintained that it should be addressed in the ongoing IRP Rulemaking in Case No. 21-00128-UT than in this case.

20. In conclusion, Staff’s Updated Recommendation found that PNM has met the requirements of the IRP Rule in their original filing as updated by its April 27th Update. Staff concluded that none of the additional issues raised by intervenors constitute a material failing of the IRP and these issues should be addressed in the ongoing IRP Rulemaking in Case No. 21-00128-UT. Staff recommended that the Commission consider accepting this IRP as filed and updated, and then possibly requiring another update be filed in the first quarter of next year to

address further delays that may occur and changing circumstance in advance of the summer of 2023.

21. The Commission concurs with Staff's Updated Recommendation that PNM's 2021 IRP for the period of 2020-2040 should be accepted as updated because it addressed the "material events" as identified in the June 9th Order as detailed in PNM's April 27th Update, contingent upon PNM file Second Update in advance of summer 2023.

22. However, the Commission also concurs with NMAREA and Interwest that PNM should address distribution and transmission planning in a meaningful way in its upcoming 2023 IRP filing because while PNM's April 27th Update expressly acknowledged that transmission constraints limit its resource adequacy and availability, PNM's current 2020 IRP fails to even start to address the issue in a meaningful way. The Commission finds that PNM's continuing delay in even starting to address them will result in further prolonging these constraints on PNM's resource and reliability options. The Commission finds PNM's 2023 IRP Action Plan should include an action item that identifies and analyzes distribution and transmission constraints and opportunities.

23. For this reason, the Commission finds that PNM should include, in its future 2023 IRP filing a meaningful analysis of transmission and distribution constraints and opportunities to increase resource availability and flexibility. The Integrated Resource Planning statute⁶

⁶ Section 62-17-10. Integrated resource planning.

Pursuant to the commission's rulemaking authority, public utilities supplying electric or natural gas service to customers shall periodically file an integrated resource plan with the commission. Utility integrated resource plans shall evaluate renewable energy, energy efficiency, load management, distributed generation and conventional supply-side resources on a consistent and comparable basis and take into consideration risk and uncertainty of fuel supply, price volatility and costs of anticipated environmental regulations in order to identify **the most cost-effective portfolio** of resources to supply the energy needs of customers. The preparation of resource plans shall incorporate a public advisory process. Nothing in this section shall prohibit public utilities from implementing cost-effective energy efficiency and **load management programs** and the commission from approving public utility expenditures on energy efficiency programs and load management programs prior to the commission establishing rules and guidelines for integrated resource planning. The commission may exempt public utilities with fewer than five thousand customers and distribution-only public utilities from the requirements of this section. The commission shall take into account a

Section 62-17-10 NMSA 1878 specifically requires that the Commission can require utilities include, in their IRPs to address load management and there is no way to plan for load management without looking at transmission and distribution. Further, given that transmission and distribution are significant capital expenditures going forward and presently, these costs make up a large part of an IRP that need to plan for the “most cost-effective portfolio” of resources.

IT IS THEREFORE ORDERED:

A. Staff’s June 29, 2022 Updated Recommendation PNM’s 2021 IRP for the period of 2020-2040 is hereby accepted.

B. PNM’s 2021 IRP for the period of 2020-2040 is hereby accepted as updated with the following recommendation based upon the reasons set forth herein that PNM include in its future 2023 IRP filing a meaningful analysis of transmission and distribution constraints and opportunities to increase resource availability and flexibility and any requirements a new or amended IRP Rule requires.

C. No later than April 1, 2023, PNM shall file in this docket a Second Update to the 2021 IRP, which shall address the same issues as it addressed in the April 27th Update.

D. A copy of this Order shall be served on all parties listed on the attached certificate of service via email, if the email address is known, and if not known, by regular mail.

E. This Order is effective immediately

public utility's resource planning requirements in other states and shall authorize utilities that operate in multiple states to implement plans that coordinate the applicable state resource planning requirements. The requirements of this section shall take effect one year following the commission's adoption of rules implementing the provisions of this section. (emphasis added).

ISSUED under the Seal of the Commission at Santa Fe, New Mexico, this 13th day of
July, 2022.

NEW MEXICO PUBLIC REGULATION COMMISSION

Voted No
CYNTHIA B. HALL, COMMISSIONER, DISTRICT 1

/s/ Jefferson L. Byrd, electronically signed
JEFFERSON L. BYRD, COMMISSIONER, DISTRICT 2

/s/ Joseph M. Maestas, electronically signed
JOSEPH M. MAESTAS, COMMISSIONER, DISTRICT 3

Voted No
THERESA BECENTI-AGUILAR, COMMISSIONER, DISTRICT 4

/s/ Stephen Fischmann, electronically signed
STEPHEN FISCHMANN, COMMISSIONER, DISTRICT 5



BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF PNM'S ELECTRIC INTEGRATED)
RESOURCE PLAN FOR THE PERIOD 2020-2040 IN) Case No. 21-00033-UT
COMPLIANCE WITH NMAC 17.7.3.9)**

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 **Final Order Adopting Staff's Recommendation to Accept PNM's IPR as Updated.**

Adam Alvarez	Adam.alvarez@pnm.com
Amanda Edwards	AE@Jalblaw.com;
Anastasia Stevens	Astevens.law@gmail.com;
Andrea Crane	ctcolumbia@aol.com;
Barry W. Dixon	Bwdixon953@msn.com;
Brian J. Haverly	bjh@keleher-law.com;
Bruce C. Throne	bthroneatty@newmexico.com;
Caitlin Liotiris	ccollins@energystrat.com;
Carey Salaz	Carey.salaz@pnm.com;
Carol Clifford	carol@thejonesfirm.com;
Casey Settles	Casey.Settles@xcelenergy.com;
Charles F. Noble	Noble.ccae@gmail.com;
Cholla Khoury	ckhoury@nmag.gov ;
Chris Hunter	Chris@cornerstoneresults.com;
Cydney Beadles	Cydney.beadles@westernresources.org;
Dahl Harris	dahlharris@hotmail.com;
David Van Winkle	Davidvanwinkle2@gmail.com;
Don Hancock	sricdon@earthlink.net;
Doug Gegax	dgegax@nmus.edu;
Evan Gillespie	Evan.Gillespie@sierraclub.org;
Germaine R. Chappell, Esq.	Gchappelle.law@gmail.com;
Heather Allen	Heather.allen@pnmresources.com;
James R. Dauphinais	jdauphinais@consultbai.com;
Jane Yee	jane.cambio@gmail.com ;
Julie Park	jpark@cabq.gov ;
Jason Marks	lawoffice@jasonmarks.com;
Jeffrey H. Albright	JA@JalBLaw.com;
Jennifer Breakell	jbbreakell@fmtn.org;
Joan Drake	jdrake@modrall.com;
Jody Kyler Cohn	jkylercohn@BKLLawfirm.com;
Joseph Yar	joseph@yarlawoffice.com

Justin Lesky	jlesky@leskylawoffice.com;
Kathleen Fraser	kfraser@energystrat.com;
Keith Herrmann	kherrmann@stelznerlaw.com;
Kelly Gould	Kelly@thegouldlawfirm.com
Kevin Higgins	khiggins@energystrat.com;
Kurt J. Boehm	kboehm@bkllawfirm.com;
Lisa Tormoen Hickey	lisahickey@newlawgoup.com;
Lisa V. Perry	lisa.perry@walmart.com;
Lorraine Talley	ltalley@montand.com;
Louis W. Rose	lrose@montand.com;
Mariel Nanasi	Mariel@seedsbeneaththesnow.com;
Mark Fenton	Mark.Fenton@pnm.com;
Mark K. Adams	mkadams@rodey.com;
Martin R. Hopper	mhopper@msrpower.org;
Marvin T. Griff	Marvin.Griff@thompsonhine.com;
Matt Gerhart	matt.gerhart@sierraclub.org;
Michael I. Garcia	mikgarcia@bernco.gov;
Nancy Burns	Nancy.burns@epelectric.com;
Nann M. Winter	nwinter@stelznerlaw.com;
Nicholas Phillips	Nicholas.phillips@pnm.com;
Noah Long	nlong@nrdc.org;
Charles W. Kolberg	ckolberg@abcwua.org;
Ralph Cavanagh	rcavanagh@nrdc.org;
Ramona Blaber	Ramona.blaber@sierraclub.org;
Randy S. Bartell	rbartell@montand.com;
Raymond L. Gifford	rgifford@wbklaw.com;
Rebecca Carter	Rebecca.carter@nmgco.com;
Representative James Strickler	jamesstrickler@msn.com;
Representative Patricia A. Lundstrom	Patricia.lundstrom@nmlegis.gov;
Representative Paul Bandy	paul@paulbandy.org;
Representative Rod Montoya	roddmontoya@gmail.com;
Richard Alvidrez	ralvidrez@mstlaw.com;
Rob Witwer	Rob.Witwer@onwardenergy.com;
Sharon T. Shaheen	sshahaheen@montand.com;
Stacey Goodwin	Stacey.Goodwin@pnmresources.com;
State Senator Steve Neville	steven.neville@nmlegis.gov;
State Senator William Sharer	bill@williamsharer.com;
Stephanie Dzur	Stephanie@Dzur-law.com;
Stephen Curtice	Stephen@youtzvaldez.com;
Steve Schwebke	Steven.Schwebke@pnm.com;
Steve W. Chriss	Stephen.chriss@wal-mart.com;
Steven Gross	gross@portersimon.com;
Steven S. Michel	stevensmichel@comcast.net ;
Thomas Domme	Thomas.domme@nmgco.com;
Thomas Manning	cfreCleanenergy@yahoo.com;
Todd Hixon	THixon@tep.com;

Vicky Ortiz
Zoe E. Lees
Michael C. Smith
Bradford Borman
Elisha Leyba-Tercero
Elizabeth Ramirez
Georgette Ramie
Jack Sidler
Marc Tupler
Peggy Martinez-Rael
Milo Chavez
John Bogatko
Judith Amer
Eli **Lasalle**

Vortiz@montand.com;
Zel@modrall.com;
MichaelC.Smith@state.nm.us;
Bradford.Borman@state.nm.us
Elisha.leyba-tercero@state.nm.us;
Elizabeth.Ramirez@state.nm.us;
georgette.ramie@state.nm.us;
Jack.Sidler@state.nm.us;
Marc.tupler@state.nm.us;
Peggy.Martinez-Rael@state.nm.us;
Milo.Chavez@state.nm.us;
John.Bogatko@state.nm.us;
Judith.amer@state.nm.us;
eli.lasalle@state.nm.us;

Dated this July 15, 2022

NEW MEXICO PUBLIC REGULATION COMMISSION

/s/ Ana C. Kippenbrock

Ana C. Kippenbrock, Law Clerk