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November 22, 2023

Melanie Sandoval  
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New Mexico Public Regulation Commission

*RE: Public Service Company of New Mexico, Grid Modernization Application  
Cost-Benefit Analysis  
NMPRC Case No. 22-00058-UT*

Dear Ms. Sandoval:

Public Service Company of New Mexico (“PNM”) is filing in the New Mexico Public Regulation Commission’s (“NMPRC” or “Commission”) Case No. 22-00058-UT, the Supplemental Testimony in Support of Cost-Benefit Analysis of PNM witnesses Omni B. Warner, James W. Shields, Mario A. Cervantes, Jonathan C. Hawkins, Eric C. Morgan, and Michael J. Settlage. This Supplemental Testimony supports the Cost-Benefit Analysis for PNM’s proposed Grid Modernization plan and was filed in response to the NMPRC’s May 31, 2023 *Order Regarding Cost Benefit Analysis* and the Hearing Examiner’s July 10, 2023 *Order Staying Proceeding*.

A copy of this information is being provided to the individuals listed on the service list for Case No. 22-00058-UT. If you have any questions regarding this filing, please contact me at 505-241-4733.

Respectfully,

*/s/ Carey Salaz*

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Carey J. Salaz

Director, Regulatory Policy and Case Management

Cc: COS for Case No. 22-00058-UT

GCG#531803

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF PUBLIC SERVICE COMPANY OF )  
NEW MEXICO’S APPLICATION FOR AUTHORIZATION )  
TO IMPLEMENT GRID MODERNIZATION )  
COMPONENTS THAT INCLUDE ADVANCED )  
METERING INFRASTRUCTURE AND APPLICATION )  
TO RECOVER THE ASSOCIATED COSTS THROUGH )  
A RIDER, ISSUANCE OF RELATED ACCOUNTING )  
ORDERS, AND OTHER ASSOCIATED RELIEF )**

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**Case No. 22-00058-UT**

**SUPPLEMENTAL TESTIMONY  
IN SUPPORT OF COST-BENEFIT ANALYSIS  
OF  
MARIO A. CERVANTES**

**November 22, 2023**

**NMPRC CASE NO. 22-00058-UT  
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BENEFIT ANALYSIS OF  
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**WITNESS FOR  
PUBLIC SERVICE COMPANY OF NEW MEXICO**

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**SUPPLEMENTAL TESTIMONY IN SUPPORT OF COST-BENEFIT ANALYSIS  
OF MARIO A. CERVANTES  
NMPRC CASE NO. 22-00058-UT**

**I. INTRODUCTION AND PURPOSE**

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

2 **A.** My name is Mario A. Cervantes. I am the Director of Customer Experience for  
3 Public Service Company of New Mexico (“PNM”). My address is 414 Silver  
4 Avenue, SW, Albuquerque, New Mexico 87102.

5

6 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?**

7 **A.** Yes, I filed Direct Testimony in support of PNM’s Application on October 3, 2022,  
8 Rebuttal Testimony on February 8, 2023, and Supplemental Testimony on March  
9 8, 2023. As I explained in my Direct Testimony, I am primarily responsible for the  
10 development and execution of the Customer Experience strategy for PNM. My  
11 areas of responsibility include the PNM Contact Center, Voice of the Customer and  
12 Insights, Digital Experience, Revenue Operations, and Low-Income Programs.

13

14 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?**

15 **A.** My testimony supports portions of PNM’s Cost-Benefit Analysis (“CBA”), filed in  
16 response to the New Mexico Public Regulation Commission’s (“Commission” or  
17 “NMPRC”) May 31<sup>st</sup> *Order Regarding Cost Benefit Analysis* and the Hearing  
18 Examiner’s July 10<sup>th</sup> *Order Staying Proceeding*.

19

20 Specifically, my testimony describes my role and the role of the Customer  
21 Experience group in providing information to Black & Veatch to conduct its CBA

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1 in support of PNM’s filing. As described in the Supplemental Testimony in  
2 Support of Cost-Benefit Analysis (“CBA Supplemental Testimony”) of PNM  
3 witness Omni Warner, PNM modeled the same technology types that were  
4 proposed in its initial application. Specifically, PNM Exhibit LES-3, which was  
5 attached to the Direct Testimony of PNM witness Laura Sanchez in the first phase  
6 of this proceeding (PNM Exhibit 2), provided an overview of PNM’s Grid  
7 Modernization Implementation Plan (“Implementation Plan” or “Grid  
8 Modernization plan”).

9

10 **II. INFORMATION PROVIDED TO BLACK & VEATCH**

11 **Q. PLEASE EXPLAIN THE INFORMATION THAT YOU PROVIDED TO**  
12 **BLACK & VEATCH FOR THE CBA.**

13 **A.** The information that my team and I provided to Black & Veatch for the CBA  
14 includes the following:

15

16 *Billing Data:*

17 In order to determine cost savings and benefits associated with AMI deployment,  
18 my team provided billing-related data regarding specific processes that will be  
19 improved by the Grid Modernization investments. Specifically, AMI and the  
20 enabling technologies will result in timely and accurate interval and meter read  
21 data. PNM and Black & Veatch identified the billing exception process as one of  
22 the primary processes that will experience significant efficiencies with AMI.

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1 Billing exceptions include bills that are automatically flagged by the billing system  
2 that fall outside of predetermined parameters and require additional manual review  
3 by a billing specialist prior to being released. These can include:

- 4 • Bills with significantly high or low energy consumption;
- 5 • Bills with zero consumption;
- 6 • Bills that show inactive accounts; and
- 7 • Bills where PNM could not access the meter.

8 Specifically, my team provided Black & Veatch with data pertaining to monthly  
9 average volumes of meter reading exceptions for the past five years, hourly labor  
10 rates, and the average amount of time it takes a billing representative to resolve an  
11 exception. PNM is projecting a 95% reduction in the volume of meter reading  
12 exceptions to determine the expected AMI savings. The assumption of a 95%  
13 reduction is based on the fact that the majority of these exceptions are caused by  
14 the current inability to access remote interval readings, which AMI will enable.

15  
16 My team also provided data related to the number of bills that are canceled and  
17 rebilled due to a billing correction, along with the labor costs for the time it takes  
18 to process these bills and the mailing (including postage) costs for such bills. PNM  
19 projected AMI will provide a 68% reduction in the number of bills that are canceled  
20 and rebilled. The 68% reduction is based on the percent of canceled and rebilled  
21 accounts that are caused by inaccurate or missing meter reads, which AMI would  
22 essentially solve. Black & Veatch used this data to determine the expected savings.

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1        Contact Center Data:

2        In order to determine cost savings associated with AMI deployment, my team  
3        provided Black & Veatch with Contact Center data pertaining to contact types  
4        (including calls, chats, and emails) that will likely experience a reduction in  
5        volumes due to customers' ability to obtain proactive, timely and granular usage  
6        data. Additionally, Contact Center volume data resulting from customer power  
7        outages and connects and disconnects was provided. Specifically, my team  
8        provided the following data:

- 9            • Average annual number of billing-related contacts (annual average for the  
10            last five years);
- 11            • Average time to resolve billing-related contacts;
- 12            • Average annual number of high bill-related contacts;
- 13            • Average annual number of estimated meter read contacts;
- 14            • Expected reduction in resolution time for billing-related contacts as a result  
15            of AMI;
- 16            • Cost-per-minute for customer service representatives to handle contacts;
- 17            • Average annual number of outage-related contacts; and
- 18            • Average annual number of connect/disconnect contacts.

19        For contacts specific to bill-related matters (i.e., high bill, energy consumption),  
20        outages, connects and disconnects, PNM assumed an expected 10% reduction in  
21        volume with AMI deployment. The projected reduction of 10% in volumes was  
22        based on industry data from other utilities that have implemented similar plans.

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1           Contacts resulting from estimated meter readings are expected to be reduced by  
2           95% given that AMI will essentially eliminate the need to estimate a meter read.  
3           Black & Veatch used these assumptions to determine estimated savings.

4

5           *Uncollectible Data:*

6           My team provided data pertaining to savings associated with uncollectible charge-  
7           offs and short-term interest due to more timely disconnects due to non-payment.<sup>1</sup>

8           The benefits associated with this are based on AMI-enabled capabilities that allow  
9           PNM to have timely and close to real time access to customer meter read data and  
10          remote disconnect capabilities to respond sooner to customers who are  
11          accumulating arrears, thus reducing the risk for uncollectible charges that PNM  
12          would otherwise need to write off.

13

14          Specifically, my team provided the following data:

- 15                 • Total uncollectible write-off amounts for 2022;
- 16                 • Expected reduction in the number of days it takes PNM to disconnect non-  
17                 paying customers and the percentage reduction that this number represents  
18                 in total time to disconnect;

---

<sup>1</sup> It should be noted that the savings associated with uncollectible charge-offs and short-term interest pertains to the time it takes PNM to deploy personnel and equipment to complete disconnects in accordance with Commission rules. PNM will follow all Commission regulations associated with notice and timing for customer disconnects.



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- 1           • Weighted average cost of capital to finance uncollectible charge-offs to  
2           determine the reduction in short-term interest as a result of more timely  
3           disconnects due to non-payment; and
- 4           • Reduction in uncollectible charge-offs due to improved customer  
5           budgeting. This benefit is based on the ability to use the daily and interval  
6           reads from AMI meters to provide customers with daily interval usage data,  
7           as well as a projection of monthly usage, so that customers can more  
8           effectively budget their monthly electrical usage and will be less likely to  
9           fall into arrears. Thus, PNM can reduce the uncollectible charges that have  
10          to be written off by helping customers prevent arrearages. PNM expects to  
11          be able to reduce the uncollectible charge-offs by an additional 2.5% by  
12          empowering customers with tools and information like the Customer  
13          Energy Management Platform (“CEMP”) and proactive alerts enabled by  
14          AMI, as well as the accompanying technologies that allow customers to  
15          have granular visibility into their energy consumption. The 2.5% reduction  
16          assumption is based on industry standards and has been used by other  
17          utilities for AMI-related cost-benefit analyses.
- 18

**SUPPLEMENTAL TESTIMONY IN SUPPORT OF COST-BENEFIT ANALYSIS  
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1        JD Power Customer Satisfaction Data:

2        To quantify the improvements to customer satisfaction resulting from shorter  
3        duration electrical outages and customers' ability to access the grid for selling  
4        energy back to PNM, my team provided JD Power customer satisfaction data.

5        Specifically, my team provided:

- 6            • JD Power customer survey results by zip code;
- 7            • 2019-2023 power quality and reliability studies mapped to feeders located  
8            in zip codes included in the JD Power results. PNM witness Warner's  
9            testimony provide information regarding how PNM and Black & Veatch  
10           used this information to determine benefits.

11

12    **Q.    WHAT GRID MODERNIZATION PROJECTS DO THE DATA YOU**  
13    **PROVIDED TO BLACK & VEATCH SUPPORT?**

14    **A.**    As discussed above, the data my team provided primarily supports Black &  
15    Veatch's calculation of AMI projects that enable customers to have access to  
16    granular energy consumption data, proactive notifications regarding energy usage  
17    and estimated bills, and recommendations for improved energy management and  
18    outage experience.

19

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1

**III. RESULTS OF CBA**

2 **Q. PLEASE DISCUSS THE RESULTS OF THE CBA FOR AMI.**

3 **A.** PNM witnesses Warner and Settlage discuss the Benefit Cost Ratio (“BCR”) results  
4 for the two different scenarios were run for AMI. While Scenario 1 for AMI does  
5 not indicate that the incremental quantified benefits of AMI outweigh costs, the  
6 range of benefits for AMI would likely yield a positive result. As discussed below,  
7 there are a number of qualitative reasons why AMI will produce substantial  
8 customer benefits over time that outweigh the costs of PNM’s Grid Modernization  
9 plan.

10

11 **Q. ARE THE RESULTS OF THE CBA CONSISTENT WITH THE DATA YOU  
12 PROVIDED AND THE BENEFITS YOU MIGHT HAVE EXPECTED?**

13 **A.** Yes, because it is expected that AMI and the accompanying technology will  
14 empower customers with information, control and tools to help manage their energy  
15 consumption and overall customer experience. In turn, this will yield benefits in  
16 the form of operational efficiencies, customer savings and improved customer  
17 satisfaction.

18

19 **Q. DOES PNM PLAN TO REDUCE FULL-TIME CUSTOMER SERVICE  
20 EMPLOYEES AS A RESULT OF THE EXPECTED O&M SAVINGS?**

21 **A.** No. PNM does not anticipate that the projected O&M savings will result in  
22 reductions to customer service full-time employees (“FTEs”). The reductions in

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1 volume in the contact center and billing area are not expected to yield FTE  
2 reductions because the resources that currently handle these volumes will be  
3 redeployed to handle expected growth in programs like the Time-of-Day (“TOD”)  
4 rates, and other planned and future programs like the pre-pay program. So, while  
5 PNM does expect savings related to AMI deployment, the savings may be captured  
6 in defraying future program costs as FTEs are shifted to serve those functions.

7

8 **Q. DO THE RESULTS ALTER ANY OF YOUR TESTIMONY THAT PNM**  
9 **MUST MOVE FORWARD WITH THE GRID MODERNIZATION**  
10 **PROJECTS?**

11 **A.** No, they do not. As discussed in the CBA Supplemental Testimony of PNM  
12 witness Warner, the results of the CBA have confirmed that PNM’s Grid  
13 Modernization plan is an overall benefit to customers, with the BCR results  
14 indicating that benefits outweigh costs. . Moreover, witness testimony both in the  
15 early phase of this case and in this CBA demonstrate the over-arching and expedient  
16 need for the grid modernization technologies PNM has proposed in this case.

17

18 **Q. ARE THERE OTHER CUSTOMER BENEFITS NOT CURRENTLY**  
19 **QUANTIFIED THAT ARE NOT CAPTURED IN THE CBA?**

20 **A.** Yes. PNM expects there will be additional benefits from implementing the CEMP  
21 that are not quantified in the CBA. Other utilities have observed that technologies  
22 or programs similar to the CEMP provide peak energy savings because customers

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1           can better manage their energy usage. PNM believes the CEMP will provide such  
2           benefits, but it is unclear to what extent they will be incremental to the TOD savings  
3           quantified in the CBA. To maintain a conservative CBA and ensure there is no  
4           overlap in peak savings for TOD that is quantified, PNM did not separately quantify  
5           peak energy savings associated with the CEMP.

6  
7           Other customer benefits not reflected in the CBA that PNM is planning for future  
8           deployment are associated with the implementation of billing and payment  
9           programs, like pre-pay and “pick your own due date.” While PNM discussed these  
10          programs in its initial application, PNM is not proposing pre-pay or “pick your own  
11          due date” customer programs as part of the initial Grid Modernization plan. As  
12          detailed in PNM’s initial application, the specifics of these programs will be  
13          included in a future rate case or other Commission filings; however, PNM expects  
14          that these programs will result in significant customer benefits. In particular, pre-  
15          pay is beneficial to low-income customers because it allows customers to pay ahead  
16          for future energy consumption. Pre-pay enables customers to set money aside,  
17          avoid fees and penalties, and practice cash management and budgeting.  
18          Additionally, pick-your-own due date is particularly beneficial to customers on a  
19          limited budget because it helps align their electric bill due date with their pay cycle  
20          or when funds are available to them. Black & Veatch’s CBA does not quantify  
21          benefits associated with these customer benefits, but PNM believes that AMI will

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1           enable the development of these programs that will be particularly beneficial to  
2           low-income or income-limited customers.

3

4   **Q.    ARE THERE OTHER QUALITATIVE BENEFITS TO THE GRID**  
5   **MODERNIZATION PROGRAMS THAT ARE NOT INCLUDED IN THE**  
6   **CBA?**

7   **A.**   Yes. The CEMP will yield significant qualitative benefits by empowering  
8           customers with access to their energy consumption and billing information on a  
9           next day basis, as well as tools and analytics to obtain proactive and personalized  
10          data regarding energy usage and provide recommendations about potential  
11          programs and solutions that may be beneficial to their unique energy needs. The  
12          CEMP will provide customers with the ability to monitor their energy usage on a  
13          next day basis, which empowers customers with the necessary information to make  
14          more timely adjustments to behaviors or make decisions about their energy  
15          consumption. CEMP-enabled features, such as usage alerts, will notify customers  
16          when their electricity consumption exceeds a pre-determined threshold, which  
17          increases customer awareness and helps prevent higher than expected bills.  
18          Customers will also have access to analytics and tools to obtain higher-level  
19          insights into their home devices and activities that drive energy consumption. Over  
20          time, PNM intends that customers will have access to Green Button Connect, which  
21          will allow customers the ability to securely transfer energy data to third-party  
22          solution providers for support in monitoring and managing energy consumption, as

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1 well as to receive information about programs that might be beneficial to the  
2 customer.

3

4 These new technologies and solutions enabled by AMI will bring customers  
5 qualitative benefits in the form of increased customer satisfaction. An issue that  
6 has been a major pain point for customers is the inability to monitor their energy  
7 use in a timely manner as well as the lack of tools and services to manage their  
8 energy usage. Proof of this is the number of complaints that are filed by PNM  
9 customers with the NMPRC Consumer Relations Division regarding unexpected  
10 and unplanned high bills. High bill complaints were the second most frequently  
11 filed complaint against PNM in 2022 and, as of November, reflect the most  
12 frequently filed complaint in 2023.

13

14 Utilities that have implemented AMI and accompanying technologies like the  
15 CEMP have been able to offer their customers personalized, timely, and actionable  
16 content, which empowers them with valuable insights to make decisions that drive  
17 meaningful outcomes. In turn, these utilities have experienced significant  
18 improvements in customer satisfaction as measured by JD Power. While PNM  
19 quantified other customer satisfaction metrics for the CBA, PNM did not quantify  
20 the customer satisfaction that will result from the CEMP as part of its CBA.  
21 Nonetheless, I believe that the CEMP, which is planned as part of the AMI

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1 deployment, will bring significant benefits to customers, including increased  
2 customer satisfaction.

3

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

5 **A.** Yes, it does.

6

*GCG#531802*



**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

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TO RECOVER THE ASSOCIATED COSTS THROUGH )  
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ORDERS, AND OTHER ASSOCIATED RELIEF )**

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**Case No. 22-00058-UT**

**SELF AFFIRMATION**

**MARIO A. CERVANTES, Director of Customer Experience, for Public Service Company of New Mexico**, upon penalty of perjury under the laws of the State of New Mexico, affirm and state: I have read the foregoing **Supplemental Testimony in Support of Cost Benefit Analysis of Mario A. Cervantes** and it is true and accurate based on my own personal knowledge and belief.

DATED this 22<sup>nd</sup> day of November, 2023.

/s/ Mario A. Cervantes  
**MARIO A. CERVANTES**

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

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RECOVER THE ASSOCIATED COSTS THROUGH A )  
RIDER, ISSUANCE OF RELATED ACCOUNTING )  
ORDERS, AND OTHER ASSOCIATED RELIEF )  
)  
**PUBLIC SERVICE COMPANY OF NEW MEXICO,** )  
)  
**Applicant** )  
)  
\_\_\_\_\_ )**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of **Public Service Company of New Mexico’s Supplemental Testimony in Support of Cost Benefit Analysis of Mario A. Cervantes** was emailed to the parties listed below on November 22, 2023:

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Dated this 22<sup>nd</sup> day of November, 2023.

By: /s/Carey Salaz  
Carey Salaz, Director  
PNM Regulatory Policy & Case Management  
Public Service Company of New Mexico