

**[EXTERNAL] 22-00154-UT-2022-11-17-PNM-Response to November 8, 2022 Bench Request Order**

Rivord, Justin <Justin.Rivord@pnm.com>

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To: Records, PRC, PRC <PRC.Records@prc.nm.gov>;ajgross@hollandhart.com <ajgross@hollandhart.com>;abbas@revtx.com <abbas@revtx.com>;Akhil, Abbas <aakhil@comcast.net>;abigail@newsdata.com <abigail@newsdata.com>;adamh@osceolaenergy.com <adamh@osceolaenergy.com>;aclee@hollandhart.com <aclee@hollandhart.com>;Alejandra.Chavira@epelectric.com <Alejandra.Chavira@epelectric.com>;alena.brandenberger@cnmec.org <alena.brandenberger@cnmec.org>;biz@lifeisgood2.com <biz@lifeisgood2.com>;alooney@ad.nmsu.edu <alooney@ad.nmsu.edu>;aalderson@consultbai.com <aalderson@consultbai.com>;AE@JalbLaw.com <AE@JalbLaw.com>;ashelhamer@courtneylawfirm.com <ashelhamer@courtneylawfirm.com>;astevens.law@gmail.com <astevens.law@gmail.com>;ctcolumbia@aol.com <ctcolumbia@aol.com>;akharriger@sawvel.com <akharriger@sawvel.com>;andrew@stone.com <andrew@stone.com>;district5@socorroelectric.com <district5@socorroelectric.com>;sancheza@rcec.coop <sancheza@rcec.coop>

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Good afternoon,

Attached for filing and service please find *PNM's Response to November 8, 2022 Bench Request Order* in NMPRC Case No. 22-00154-UT.

Thank you,

**Justin Rivord**  
**Regulatory Research and File Analyst**  
**505-241-0675**  
**Justin.Rivord@pnm.com**

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF AN INQUIRY INTO ELECTRIC )  
PUBLIC UTILITIES' VEGETATION MANAGEMENT ) Case No. 22-00154-UT  
PLANS AND PROCEDURES )**

**PUBLIC SERVICE COMPANY OF NEW MEXICO'S RESPONSE  
TO NOVEMBER 8, 2022 BENCH REQUEST ORDER**

Public Service Company of New Mexico ("PNM") hereby provides its response to the Bench Request issued on November 8, 2022:

**BENCH REQUEST A(1):**

**DO YOU DIVIDE YOUR SERVICE TERRITORY INTO DIFFERENT FIRE WEATHER ZONES?**

**RESPONSE:**

PNM's Wildfire Mitigation Program ("WMP") created Hazardous Fire Areas ("HFAs") using a combination of United States Forest Service ("USFS") data known as Wildfire Hazard Potential ("WHP") and PNM's own assets which were buffered and used to intersect the WHP. Areas of predominantly Moderate-High-Very High wildfire hazard inside the buffer were aggregated into HFAs. The HFAs represent areas where fuel and weather conditions may make fires difficult to control. The weather conditions in the HFAs are monitored daily by operations personnel.

**BENCH REQUEST A(2):**

**DO YOU CURRENTLY HAVE AN IGNITION MANAGEMENT PLAN (I.E., PROCEDURES AND PRACTICES IN THE EVENT OF A FIRE IGNITING IN YOUR SERVICE TERRITORY) OR HAVE YOU BEGUN TO DEVELOP ONE? IF YES, PLEASE DESCRIBE ITS STATUS; IF NOT, PLEASE EXPLAIN.**

**RESPONSE:**

The WMP addresses the classification of and response to wildfire in the Service Territory ("ST").

The fire classification schema clarifies responsibilities of PNM personnel as fire complexity, indicated by system/company impacts, increases. The NMPRC definition of an Ignition Management Program differs from that which is typically understood. The nature of the questions lends itself to an answer with respect to the Wildfire Response and Recovery section of the WMP.

**BENCH REQUEST A(3):**

**TO THE EXTENT THAT YOU HAVE PLANS ON VEGETATION MANAGEMENT AND WILDFIRE MITIGATION, WHAT CHALLENGES HAVE YOU FACED IN IMPLEMENTING THOSE PLANS, INCLUDING BUT NOT LIMITED TO FUNDING CHALLENGES AND POTENTIAL SOLUTIONS?**

**RESPONSE:**

PNM has a WMP and a Vegetation Management plan, both of which reflect applicable industry standards. However, there is no “one size fits all” approach to the development and implementation of these plans which must be tailored to the specific utility assets and the geographic and topographic environments in which the assets operate. The implementation of these plans is data driven which requires periodic and ongoing assessment of conditions in the field. This often requires access to remote and other areas. A large portion of the identified HFAs are on Tribal or federally managed lands and require permission from the applicable entities before access can be obtained. PNM is actively working with these entities to formulate procedures to proactively facilitate easier access and clearing of vegetation as warranted.

**BENCH REQUEST C(1):**

**YOUR “WILDFIRE MITIGATION PLAN” SPECIFICALLY STATES THAT ASSET AGE AND CONDITION INFORMATION IS KNOWN “LOCALLY” AND “ANECDOTALLY.” SINCE ISSUING YOUR WILDFIRE MITIGATION PLAN, HAVE YOU TAKEN STEPS TO BEGIN RECORDING THIS INFORMATION IN YOUR GEOGRAPHIC INFORMATION SYSTEM? IF NOT, WHY NOT? PLEASE DESCRIBE SPECIFIC BARRIERS, IF ANY.**

**RESPONSE:**

Yes. PNM has embarked on a multifaceted effort to assess the asset age and condition information in PNM's geographic information system ("GIS"). To assist with PNM's wildfire mitigation efforts, PNM has initiated development of an enhanced GIS inspection/asset inventory data collection and management platform for office and field use that enables virtual inspections/inventories using high-resolution imagery and boots-on-the-ground inspections/inventories, as well as supporting data analysis, management, and reporting functions. The system is still under development, but it is already at an advanced stage sufficient to enable it to be used to support virtual inspections. This is important because PNM has contracted with a helicopter services provider to collect high resolution imagery of the distribution poles and transmission structures in all PNM's HFAs as the basis for virtual inspections and inventorying functions as well as vegetation management. The data collection process is nearing completion and the virtual inspections have been initiated. When completed, PNM will have enhanced condition information for all overhead transmission and distribution ("T&D") lines within HFAs incorporated into PNM's GIS. At present, confirmed age information for approximately half of the overhead T&D assets in PNM's HFAs is available in PNM's GIS. Other PNM data repositories also contain age information for our overhead T&D assets. Once PNM has completed the development of the aforementioned data collection system, PNM will be looking at opportunities to integrate data from other sources, including future boots-on-the-ground inspections. PNM believes that gathering up-to-date condition information is a higher priority for wildfire mitigation than asset age data and therefore has focused efforts in that direction for now.

**BENCH REQUEST C(2):**

**YOUR WILDFIRE MITIGATION PLAN SPECIFICALLY MENTIONS INITIATING IGNITION MANAGEMENT PLANS TO COLLECT DATA ON IGNITION SOURCES. HAVE YOU COMPLETED AN IGNITION MANAGEMENT PLAN OR OTHERWISE BEGUN DEVELOPING ONE? IF NOT, PLEASE EXPLAIN WHY NOT.**

**RESPONSE:**

The WMP lays out a framework recommending the initiation of an Ignition Management Program (“IMP”), and the WMP provides details that should be included when establishing an IMP. PNM has not yet initiated a formal IMP but is collecting data for analysis to identify assets and areas of concern which will drive future implementation of the IMP. Implementation of this component of the WMP is expected to commence as more data are collected and additional elements of the WMP are implemented.

**BENCH REQUEST C(3):**

**YOUR WILDFIRE MITIGATION PLAN SPECIFICALLY MENTIONS THE DEVELOPMENT OF A SURFACE PROGRAM AS AN ALTERNATIVE TO UNDERGROUNDING. HAS THIS PROGRAM BEEN IMPLEMENTED OR DEVELOPED FURTHER SINCE ISSUING YOUR WILDFIRE MITIGATION PLAN? IF NOT, PLEASE EXPLAIN WHY NOT.**

**RESPONSE:**

Yes. Multiple activities have been initiated in parallel. A few examples include:

Mitigating certain types of asset conditions identified via the inspection program described above. Replacing explosive fuses. The full rollout will be an extensive program. Therefore, PNM is proceeding in a manner to help ensure the ultimate success of the program. As an initial step, PNM has developed a plan for a pilot/trial use/evaluation and training program to be deployed within several of PNM’s HFAs. The lead time for some of this equipment is such that it was not feasible to complete this year. However, the equipment for the pilot has been ordered and the pilot implementation is slated to be completed prior to the beginning of the 2023 wildfire season. PNM

is conducting an assessment of potential ignition risks caused by wildlife interaction with PNM power delivery infrastructure. This assessment will lead to the development of optimized plans for retrofitting existing equipment to mitigate ignition risks.

**BENCH REQUEST C(4):**

**SINCE YOU ISSUED YOUR WILDFIRE MITIGATION PLAN, HAVE YOU DEVELOPED ANY IDEAS THAT ARE NOT CONTAINED IN THE PLAN FOR WILDFIRE MITIGATION, INCLUDING NEW TECHNOLOGIES OR METHODOLOGIES?**

**RESPONSE:**

PNM has developed a WPM which is subject to ongoing review and implementation. PNM has explored new elements and technologies to assist in its WPM efforts. Examples include:

PNM is evaluating a voltage gradient-based approach to prioritizing vegetation management work.

If successful, this will enable PNM to better focus vegetation related mitigation resources where they will have the greatest impact on risk reduction. PNM is developing a GIS-based inspection system with office and mobile components to support virtual inspections in the office and boots-on-the-ground inspections as well as data management, analysis, and reporting functions.

Ultimately, this system will enable better decision-making and quicker response to conditions needing mitigation. PNM is finding new and more cost-effective ways to leverage the remote sensing data (LiDAR, high resolution imagery and near infrared imagery) that PNM is capturing in HFAs for multiple use cases, thereby enabling PNM to conduct an asset inventory, virtual inspection, and engineering more quickly and efficiently; originally this data was captured primarily to support vegetation management. PNM has joined the Electric Power Research Institute's ("EPRI") Climate READi REsilience and ADaptation initiative. This program is intended to help the participating members better manage climate related risks (e.g., wildfire risks) associated with the power system. PNM is investigating use of multiple technologies and methods

to enhance situational awareness including the deployment of strategically placed mountain top cameras to provide early warning of smoke plumes and other potential indicators of wildfires during their initial stage with the goal of enabling more rapid response. In addition, PNM is evaluating infrastructure upgrades which will reduce the potential of wildfire ignition, such as utilizing non-expulsion fuses, covered and insulated overhead conductors, and the potential of placing lines underground instead of overhead.

**BENCH REQUEST C(5):**

**DO YOU CURRENTLY HAVE, OR ARE YOU DEVELOPING, AN IGNITION MANAGEMENT PLAN, OR ARE YOU OTHERWISE TRACKING WILDFIRES? PLEASE EXPLAIN.**

**RESPONSE:**

PNM subscribes to an external vendor that provides initial reports of wildfires proximate to PNM electrical facilities. These wildfires remain in the “system” and are available for reference by authorized PNM personnel.

**BENCH REQUEST E(1):**

**YOUR PLANS MENTION THE BRAMBLE AND BYRNES METHOD FOR VEGETATION MANAGEMENT. IS THIS METHOD ADAPTED FOR HIGH DESERT ENVIRONMENTS?**

**RESPONSE:**

PNM uses Integrated Vegetation Management (“IVM”) which is applicable in any terrain type. The methodology is focused not on what vegetation is removed, but what vegetation types are promoted to grow in its place to establish an ecosystem that requires less invasive vegetation removals. The Bramble and Byrnes method is a component of IVM.

**BENCH REQUEST E(2):**

**ARE THERE LIMITS TO HOW YOU APPLY THE BRAMBLE AND BYRNES METHOD (I.E., SPECIFIC AREAS WHERE IT IS APPROPRIATE)?**

**RESPONSE:**

Yes. Due to the abundance of compatible low-growing plant communities prominent in high desert environments, the use of the Bramble and Byrnes method is not always necessary. Where taller, incompatible woody species are present, PNM has realized positive results within the transmission system rights of way (“ROW”) by targeting specimens through selective removal while working to minimize the impact to grass, herb, and shrub communities.

**BENCH REQUEST E(3):**

**WHAT ARE THE SHORTCOMINGS OF APPLYING THIS METHOD?**

**RESPONSE:**

Because PNM does not use the Bramble and Byrnes method exclusively, PNM is able to avoid shortcomings incumbent in that system.

**BENCH REQUEST E(4):**

**YOUR PLANS MENTION THAT VEGETATION DEBRIS IS GENERALLY THE RESPONSIBILITY OF THE LANDOWNER. HAVE THERE BEEN ANY IGNITION ISSUES WITH SLASH PILES OR STACKED LOGS?**

**RESPONSE:**

PNM is not presently aware of any confirmed ignition issues with slash piles or stacked logs. Beginning in 2014, PNM’s Standard Operation Procedure on transmission system ROWs has been to cut slash so that it is no taller than knee height and scatter within the ROW. Exceptions include requests made by landowners and temporary staging by PNM crews as an area is being worked.

Due to the size of vegetation, logs or log piles are typically small and sparse within the ROW.



**BENCH REQUEST E(5):**

**HOW DO YOU MONITOR, IF AT ALL, LANDOWNERS' COLLECTION OF DEBRIS?**

**RESPONSE:**

PNM does not monitor landowners' collection of debris.

**BENCH REQUEST E(6):**

**HOW LONG DOES IT TAKE FOR LANDOWNERS TO COLLECT DEBRIS?**

**RESPONSE:**

See response to Bench Request E(5)

**PUBLIC SERVICE COMPANY OF NEW MEXICO**

*/s/ John Verheul*

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Stacey J. Goodwin, Associate General Counsel  
John Verheul, Corporate Counsel  
PNMR Services Company  
Corporate Headquarters – Legal Department  
Albuquerque, NM 87158-0805  
(505) 241-4864  
Stacey.Goodwin@pnmresources.com  
John.Verheul@pnmresources.com

*/s/ Richard L. Alvidrez*

---

Richard L. Alvidrez  
Miller Stratvert P.A.  
500 Marquette NW, Suite 1100  
P.O. Box 25687  
Albuquerque, NM 87125  
(505) 842-1950  
ralvidrez@mstlaw.com  
*Attorneys for Public Service Company of New Mexico*

GCG #530047

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

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**IN THE MATTER OF AN INQUIRY INTO ELECTRIC ) Case No. 22-00154-UT  
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PLANS AND PROCEDURES )**

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of **Public Service Company of New Mexico's Response to November 8, 2022 Bench Request Order** was emailed to parties at the email addresses below on November 17, 2022:

NMPRC Records Management	<a href="mailto:Prc.records@prc.nm.gov">Prc.records@prc.nm.gov</a> ;
A.J. Gross	<a href="mailto:ajgross@hollandhart.com">ajgross@hollandhart.com</a> ;
Abbas Akhil	abbas@revtx.com;
Abbas Akhil	aakhil@comcast.net;
Abigail Sawyer	abigail@newsdata.com;
Adam Harper	adamh@osceolaenergy.com;
Adele Lee	aclee@hollandhart.com;
Alejandra Chavira	Alejandra.Chavira@epelectric.com;
Alena Brandenberger	alena.brandenberger@cnmec.org;
Allen H. Downs	biz@lifeisgood2.com;
Alton Looney	alooney@ad.nmsu.edu;
Amanda Alderson	aalderson@consultbai.com;
Amanda Edwards	AE@JalbLaw.com;
Amy Shelhamer	ashelhamer@courtneylawfirm.com;
Anastasia S. Stevens	astevens.law@gmail.com;
Andrea Crane	ctcolumbia@aol.com;
Andrew Harriger	akharriger@sawvel.com;
Andrew Stone	andrew@stone.com;
Anne Dorough	district5@socorroelectric.com;
Antonio Sanchez	sancheza@rcec.coop;
Art O'Donnell	Art.O'Donnell@prc.nm.gov;
Austin Rueschhoff	darueschhoff@hollandhart.com;
B. Hart	Joshua.smith@sierraclub.org;
Ben Luxenberg	ben.luxenberg@galeheaddev.com;
Bernnarr Treat	Bernarr.R.Treat@xcelenergy.com
Bobby Ferris	bferris@lcecnet.com;
Brad Baldrige	brad.baldrige@xcelenergy.com;
Bradford Borman	<a href="mailto:Bradford.borman@prc.nm.gov">Bradford.borman@prc.nm.gov</a> ;
Brian K. Johnson, PE	brian@nmreta.net;
Brooke Trammell	Brooke.a.trammell@xcelenergy.com;
Bruce Throne	bthronetty@newmexico.com;
Capt Robert L. Friedman	Robert.Friedman.5@us.af.mil;
Capt. Lanny Zieman	Lanny.Zieman.1@us.af.mil;

Capt. Natalie Cepak	Natalie.Cepak.2@us.af.mil;
Carey Salaz	Carey.Salaz@pnm.com;
Carla Najjar	csnajjar@virtuelaw.com;
Carol Clifford	carol@thejonesfirm.com;
Cindy Baeza	cindy.baeza@xcelenergy.com;
CCAE- Charles Noble	noble.ccae@gmail.com;
CFRECLEANENERGY	cfrecleanenergy@yahoo.com;
Charles Garcia	cgarcia@cuddymccarthy.com;
Charles Mulcock	charliem@ote-coop.com;
Charles T. Pinson	cpinson@cvecoop.org;
Chris Dizon	Chris.dizon@endlessenergy.solar;
Chris Martinez	Chrism@col-coop.com;
Chris McKee	chris.mckee@krqe.com;
Chris Punt	chris.j.punt@xcelenergy.com;
Chuck Moore	cmoore@navopache.org;
Collin Gillespie	<a href="mailto:Collin.Gillespie@prc.nm.gov">Collin.Gillespie@prc.nm.gov</a> ;
Columbus Electric	general@col-coop.com;
Continental Divide Electric	bob@rf-lawfirm.com;
Corina Sandoval	csandoval@cdec.coop;
Curtis Hutcheson	Curtis.hutcheson@epelectric.com;
Cydney Beadles	cydney.beadles@westernresources.org;
Cynthia Hall	<a href="mailto:Cynthia.Hall@prc.nm.gov">Cynthia.Hall@prc.nm.gov</a> ;
Dahl Harris	dahlharris@hotmail.com;
Damon Withrow	damon.withrow@xcelenergy.com;
Dana S. Hardy	dhardy@hinklelawfirm.com;
Daniel Najjar	dnajjar@virtuelaw.com;
Daniel Najjar	vnajjar@aol.com;
Danil Weinman	dan@ppcsolar.com;
Darren Zigich	<a href="mailto:darenk.zigich@prc.nm.gov">darenk.zigich@prc.nm.gov</a> ;
Dave Sonntag	D_Sonntag@wfec.com;
David Black	<a href="mailto:david.black@prc.nm.gov">david.black@prc.nm.gov</a> ;
David Spradlin	spradlin@springercoop.com;
Delbert Lucero	delbertl@ote-coop.com;
Dena M. Bennett	dmb@modrall.com;
Denise Barrera	deniseb@secpower.com;
Devi Glick	dglick@synapse-energy.com;
Don Hancock	ricdon@earthlink.com;
Duncan Valley Electric	kimberly@dvec.org;
Dylan Connelly	dylan.connelly@affordable-solar.com;
Ed Rilkoff	<a href="mailto:ed.rilkoff@prc.nm.gov">ed.rilkoff@prc.nm.gov</a> ;
Ed Rougemont	ederougemont@nmelectric.coop;
EJ-Charles Carter Hall	Chall@earthjustice.org;
EJ-Jill Tauber	jtauber@earthjustice.org;
EJ-Sara Gersen	sgersen@earthjustice.org;
Elisha Leyba-Tercero	<a href="mailto:Elisha.Leyba-Tercero@prc.nm.gov">Elisha.Leyba-Tercero@prc.nm.gov</a> ;
Elizabeth Ramirez	<a href="mailto:Elizabeth.Ramirez@prc.nm.gov">Elizabeth.Ramirez@prc.nm.gov</a> ;

Eric Martinot	emartinot@gridworks.org;
Ernesto Gonzales	egonzales@jemezcoop.org;
Farmers' Electric Cooperative, Inc.	fec@fecnm.org;
Fred Kennon	fredk@donaanacounty.org;
Gabriella Dasheno	<a href="mailto:Gabriella.Dasheno@prc.nm.gov">Gabriella.Dasheno@prc.nm.gov</a> ;
Gabrielle Burkhart	Gabrielle.Burkhart@krqe.com;
Garibay, Joe A	joe.garibay@epelectric.com;
Gary Roulet	g_roulet@wfec.com;
Gideon Elliot	gelliott@nmag.gov;
Gilbert Fuentes	<a href="mailto:GilbertT.Fuentes@prc.nm.gov">GilbertT.Fuentes@prc.nm.gov</a> ;
Gino Grilli	ggrilli@dimension-energy.com;
Greg R. Meyer	gmeyer@consultbai.com;
Greg Sonnenfeld	greg@sonnenfeldconsulting.com;
Holland Hart	glgarganoamari@hollandhart.com;
Jack Sidler	<a href="mailto:Jack.Sidler@prc.nm.gov">Jack.Sidler@prc.nm.gov</a> ;
Jacob Fraatz	jfraatz@dimension-energy.com;
Jacqueline Waite	<a href="mailto:jacqueline.waite@prc.nm.gov">jacqueline.waite@prc.nm.gov</a> ;
James Schichtl	James.Schichtl@epelectric.com;
Jane L. Yee	jane.cambio@gmail.com;
Jane Yee	jane.cambio@gmail.com;
Janie Chermak	jchermak@unm.edu;
Jarryd Commerford	jarryd@srenergy.com;
Jason Marks	lawoffice@jasonmarks.com;
Jason Montoya	<a href="mailto:JasonN.Montoya@prc.nm.gov">JasonN.Montoya@prc.nm.gov</a> ;
Jason Trujillo	jtrujillo@morasanmiguel.coop;
Javier Perea	lperea@solarsmartliving.com;
Jeff Wernert	jwernert@theprimegroupllc.com;
Jeffrey H. Albright	JA@JalbLaw.com;
Jeffrey J. Wechsler	Jwechsler@montand.com;
Jemez Mountain Electric	mhastings@jemezcoop.org;
Jenna Warmuth	jwarmuth@nexamp.com;
Jennifer Ortiz	Jennifer.Ortiz@epelectric.com;
Jennifer Vega-Brown	Jvega-brown@las-cruces.org;
Jeremey Lewis	jlewis@slo.state.nm.us;
Jim DesJardins	jimdesjardins1@gmail.com;
Jim DesJardins	j.desjardins@hotmail.com;
Joan Drake	jdrake@modrall.com;
John Bogatko	<a href="mailto:John.bogatko@prc.nm.gov">John.bogatko@prc.nm.gov</a> ;
Jorge A. Garcia	JAG@las-cruces.org;
Jose F. Provencio	Jprovencio@las-cruces.org;
Jose Lovato	jlovato@kitcarson.com;
Joseph Yar	joseph@yarlawoffice.com;
Joshua L. Smith	Jsmith.watsonlawlc@gmail.com;
Jospeh Herrera	jherrera@socorroelectric.com;
Judith Amer	Judith.Amer@state.nm.us;
Judith Parsons	Judith.parsons@epelectric.com;

Julia Broggi	<a href="mailto:jbroggi@hollandhart.com">jbroggi@hollandhart.com</a> ;
Julie Park	<a href="mailto:jpark@cabq.gov">jpark@cabq.gov</a> ;
Julie Tackett	<a href="mailto:j_tackett@wfec.com">j_tackett@wfec.com</a> ;
Kari E. Olson	<a href="mailto:Kolson@montand.com">Kolson@montand.com</a> ;
Katelyn Hart	<a href="mailto:katelyn.hart@gknet.com">katelyn.hart@gknet.com</a> ;
Katherine Coleman	<a href="mailto:katie.coleman@tklaw.com">katie.coleman@tklaw.com</a> ;
Keith Herrmann	<a href="mailto:kherrmann@stelznerlaw.com">kherrmann@stelznerlaw.com</a> ;
Kelly Gould	<a href="mailto:kelly@thegouldlawfirm.com">kelly@thegouldlawfirm.com</a> ;
Kelsey Rader	<a href="mailto:Krader@cabq.gov">Krader@cabq.gov</a> ;
Ken Wilson	<a href="mailto:ken.wilson@westernresources.org">ken.wilson@westernresources.org</a> ;
Keven Gedko	<a href="mailto:kgedko@nmag.gov">kgedko@nmag.gov</a> ;
Keven Groenewold	<a href="mailto:kgroenewold@nmelectric.coop">kgroenewold@nmelectric.coop</a> ;
Kitty Turner	<a href="mailto:KAT@jpollockinc.com">KAT@jpollockinc.com</a> ;
Kyle J. Smith	<a href="mailto:Kyle.j.smith124.civ@mail.mil">Kyle.j.smith124.civ@mail.mil</a> ;
Kyle Reddell	<a href="mailto:kyle.a.reddell@xcelenergy.com">kyle.a.reddell@xcelenergy.com</a> ;
Lance Adkins	<a href="mailto:lance@fecnm.org">lance@fecnm.org</a> ;
Larry Blank	<a href="mailto:lb@tahoeconomics.com">lb@tahoeconomics.com</a> ;
Laura Rodriguez	<a href="mailto:laura.rodriguez@epelectric.com">laura.rodriguez@epelectric.com</a> ;
Lea County Electric	<a href="mailto:mnewell@newellawnm.com">mnewell@newellawnm.com</a> ;
Leah Boone	<a href="mailto:LBoone@cvecoop.org">LBoone@cvecoop.org</a> ;
Les Montoya	<a href="mailto:lmontoya@morasanmiguel.coop">lmontoya@morasanmiguel.coop</a> ;
Leslie Padilla	<a href="mailto:Leslie.Padilla@pnmresources.com">Leslie.Padilla@pnmresources.com</a> ;
Linda Hudgins	<a href="mailto:Linda.l.hudgins@xcelenergy.com">Linda.l.hudgins@xcelenergy.com</a> ;
Linda Pleasant	<a href="mailto:Linda.pleasant@epelectric.com">Linda.pleasant@epelectric.com</a> ;
Lisa LaRoque	<a href="mailto:Llarocque@las-cruces.org">Llarocque@las-cruces.org</a> ;
Lisa Tormoen Hickey	<a href="mailto:lisahickey@newlawgroup.com">lisahickey@newLawgroup.com</a> ;
Luis Reyes	<a href="mailto:lreyes@kitcarson.com">lreyes@kitcarson.com</a> ;
M. Poche	<a href="mailto:mpoche@kitcarson.com">mpoche@kitcarson.com</a> ;
Maj Scott Kirk	<a href="mailto:scott.kirk.2@us.af.mil">scott.kirk.2@us.af.mil</a> ;
Maj. Andrew J. Unsicker	<a href="mailto:Andrew.Unsicker@us.af.mil">Andrew.Unsicker@us.af.mil</a> ;
Marcia B. Driggers	<a href="mailto:marcyd@las-cruces.org">marcyd@las-cruces.org</a> ;
Mariel Nanasi	<a href="mailto:Mariel@seedsbeneaththesnow.com">Mariel@seedsbeneaththesnow.com</a> ;
Mario A. Contreras	<a href="mailto:Mario.a.contreras@xcelenergy.com">Mario.a.contreras@xcelenergy.com</a> ;
Mario A. Romero	<a href="mailto:marior@ote-coop.com">marior@ote-coop.com</a> ;
Mark Faulkenbury	<a href="mailto:M_Faulkenberry@wfec.com">M_Faulkenberry@wfec.com</a> ;
Mark Fenton	<a href="mailto:Mark.Fenton@pnm.com">Mark.Fenton@pnm.com</a> ;
Mark Tupler	<a href="mailto:Marc.Tupler@prc.nm.gov">Marc.Tupler@prc.nm.gov</a> ;
Mark Walker	<a href="mailto:Mark.a.walker@xcelenergy.com">Mark.a.walker@xcelenergy.com</a> ;
Marta Tomic	<a href="mailto:marta@votesolar.org">marta@votesolar.org</a> ;
Matthew Collins	<a href="mailto:matthew.collins@cnmec.org">matthew.collins@cnmec.org</a> ;
Matthew Dunne	<a href="mailto:Mdunne337@gmail.com">Mdunne337@gmail.com</a>
Matthew Loftus	<a href="mailto:matthew.p.loftus@xcelenergy.com">matthew.p.loftus@xcelenergy.com</a> ;
Matthew Miller	<a href="mailto:Matthew.miller@sierraclub.org">Matthew.miller@sierraclub.org</a> ;
Maureen Reno	<a href="mailto:mreno@reno-energy.com">mreno@reno-energy.com</a> ;
Mayane Barudin	<a href="mailto:mayane@votesolar.org">mayane@votesolar.org</a> ;
Mayor Trujillo	<a href="mailto:mayortrujillo@cityofanthonymn.org">mayortrujillo@cityofanthonymn.org</a> ;

Melanie Enderdine	makenderdine@energyfuturesinitiative.org;
Melissa Trevino	Melissa_Trevino@oxy.com;
Merrie Lee Soules	mlsoules@hotmail.com;
Michael C. Smith	<a href="mailto:michaelc.smith@prc.nm.gov">michaelc.smith@prc.nm.gov</a> ;
Michael I. Garcia	MikGarcia@bernco.gov;
Michael J. Moffett	mmoffett@cmtisantafe.com;
Michael Keegan	mkeegan@wbklaw.com;
Michael P. Gorman	mgorman@consultbai.com;
Michael Ropp	meropp@sandia.gov;
Michelle Rosier	<a href="mailto:Michelle.rosier@prc.nm.gov">Michelle.rosier@prc.nm.gov</a> ;
Mike D'Antonio	michael.a.d'antonio@xcelenergy.com;
Mora-San Miguel Electric	lwiggin@wwlaw.us;
Mr. Thomas Jernigan	Thomas.Jernigan.3@us.af.mil;
Ms. Ebony Payton	Ebony.Payton.ctr@us.af.mil;
Nadine Varela	nvarela@kitcarson.com;
Nancy Burns	Nancy.burns@epelectric.com;
Nann M. Winter	nwinter@stelznerlaw.com;
Nathan Duran	nduran@jemezcoop.org;
Navopache Electric	ggouker@navopache.org;
Neil Burbure	neil.burbure@galeheaddev.com;
Nelson Goodin	nelsong@donaanacounty.org;
Nicholas Koluncich	nkoluncich@slo.state.nm.us;
Nikolas Stoffel	nsstoffel@hollandhart.com;
NMIEC- James Dauphinais	jdauphinais@consultbai.com;
NMIEC- Peter Gould	peter@thegouldlawfirm.com;
NMIEC-Richard C. Mertz	rcmertz7@outlook.com;
NMSU- Doug Gegax	dgegax@nmsu.edu;
NMSU General Counsel	gencounsel@nmsu.edu;
Northern Rio Arriba Electric	nora@noraelectric.org;
Olga Lavrova	olavrova@nmsu.edu;
Otero County Electric	s.t.overstreet.law@gmail.com;
Pat O'Connell	pat.oconnell@westernresources.org;
Patricia Griego	Patricia.griego@epelectric.com;
Paulina Olivas	paulina@solarsmartliving.com;
Peggy Martinez-Rael	<a href="mailto:Peggy.Martinez-Rael@prc.nm.gov">Peggy.Martinez-Rael@prc.nm.gov</a> ;
Perry Robinson	Perry.Robinson@urenco.com;
Philip B. Simpson	philipbsimpson@comcast.net;
Phillip Oldham	phillip.oldham@tklaw.com;
Pollard, William	william.pollard@epelectric.com;
Prosperity Works- Ona Porter	Ona@Prosperityworks.net;
Raelynn Bean	rbean@cvecoop.org;
Randy Massey	masseyfarm@vtc.net;
Ricardo Gonzales	rico.gonzales@epelectric.com;
Richard Alvidrez	ralvidrez@mstlaw.com;
Rick Gilliam	Rick@votesolar.org;
Robert Castillo	rcastillo@cdec.coop;

Robert Lundin	<a href="mailto:robert.lundin@prc.nm.gov">robert.lundin@prc.nm.gov</a> ;
Roberto Favela	roberto.favela@epelectric.com;
Rod Sgrignoli	rodne.y.sgrignoli@xcelenergy.com;
Roosevelt County Electric	rcec@rcec.coop;
Russ McKee	RMcKee@cvcoop.org;
Russell Fisk	<a href="mailto:Russell.fisk@prc.nm.gov">Russell.fisk@prc.nm.gov</a> ;
Ruth Sakya	Ruth.sakya@xcelenergy.com;
Ryan Centerwall	ryan.centerwall@affordable-solar.com;
Saif Ismail	<a href="mailto:sismail@cabq.gov">sismail@cabq.gov</a> ;
Sara Birmingham	sbirmingham@seia.org;
Saul J. Ramos	sramos@doeal.gov;
Shawna Tillberg	shawna@yarlawoffice.com;
Sierra Electric	sierra@secpower.com;
Sierra Club – Ramona Blaber	Ramona.blaber@sierraclub.org;
Sky Stanfield	stanfield@smwlaw.com;
Socorro Electric	service@socorroelectric.com;
Sonya Mares	smares@hinklelawfirm.com;
Southwestern Electric	gary@alsuplawoffice.com;
Springer Electric	dsmith9346@zialink.com;
Stacey Goodwin	Stacey.Goodwin@pnmresources.com;
Stephanie Dzur	Stephanie@Dzur-Law.com;
Steve Newby	snewby@zianet.com;
Steve Schwebke	Steven.Schwebke@pnm.com;
Steve Seelye	sseelye@theprimegrouppllc.com;
Steven Lunt	stewel@dvec.org;
Steven Rymsha	steven.rymsha@sunrun.com;
Sydney Wright	swright@nmag.gov;
Taiyoko Saidewic	Taiyoko@PositiveEnergySolar.com;
Thomas Moore	thom@fecnm.org;
Thorvald A. Nelson	tnelson@hollandhart.com;
Tim Dobson	tdobson@ad.nmsu.edu;
TKLaw office	tk.eservice@tklaw.com;
Travis Dorr	travis.a.dorr@xcelenergy.com;
Travis Sullivan	tsullivan@swec-coop.org;
Tri-State Generation and Transmission	kreif@tristategt.org;
TSgt Arnold Braxton	Arnold.Braxton@us.af.mil;
TSgt Ryan Moore	Ryan.Moore.5@us.af.mil;
Tyler Fitch	<a href="mailto:tfitch@synapse-energy.com">tfitch@synapse-energy.com</a> ;
Vidal Barela	vbarela@morasanmiguel.coop;
Vincent Martinez	vmartinez@tristategt.org;
Wade Nelson	WNelson@cvcoop.org;
Western Farmers Electric	matt.caves@wfec.com;
Will DuBois	Will.w.dubois@xcelenergy.com;
William Templeman	wtempleman@cmtisantafe.com;
WRA - Steve Michel	smichel@westernresources.org;
Zoe E. Lees	<a href="mailto:zoe.e.lees@xcelenergy.com">zoe.e.lees@xcelenergy.com</a> ;



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By: /s/ Justin Rivord  
Justin Rivord, Analyst  
Regulatory Policy and Case Management  
Public Service Company of New Mexico

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