

[EXTERNAL] 22-00309-UT NMAG Direct Testimony of Andrea C. Crane, Dr. Sol DeLeon,  
and John A. Rosenkranz

Joshua LaFayette <jlafayette@nmag.gov>

Fri 10/27/2023 3:36 PM

To:Records, PRC, PRC <PRC.Records@prc.nm.gov>;Kippenbrock, Ana, PRC <Ana.Kippenbrock@prc.nm.gov>;tmd@jhkmlaw.com <tmd@jhkmlaw.com>;bjh@jhkmlaw.com <bjh@jhkmlaw.com>;tmd@jhkmlaw.com <tmd@jhkmlaw.com>;bjh@jhkmlaw.com <bjh@jhkmlaw.com>;jth@jhkmlaw.com <jth@jhkmlaw.com>;rebecca.carter@nmgco.com <rebecca.carter@nmgco.com>;anita.hart@nmgco.com <anita.hart@nmgco.com>;gerald.weseen@nmgco.com <gerald.weseen@nmgco.com>;nicole.strauser@nmgco.com <nicole.strauser@nmgco.com>;Keven Gedko <kgedko@nmag.gov>;Maria Oropeza <moropeza@nmag.gov>;Andrea Crane <ctcolumbia@aol.com>;Joshua LaFayette <jlafayette@nmag.gov>;Gideon Elliot <gelliot@nmag.gov>;mariel@seedsbeneaththesnow.com <mariel@seedsbeneaththesnow.com>;chris@doddm.com <chris@doddm.com>;Cydney.Beadles@westernresources.org <cydney.beadles@westernresources.org>;caitlin.evans@westernresources.org <caitlin.evans@westernresources.org>

📎 3 attachments (855 KB)

22-00309-UT 2023-10-27 NMAG Testimony Andrea Crane.pdf; 22-00309-UT 2023-10-27 NMAG Direct Testimony Dr. Sol DeLeon.pdf; 22-00309-UT 2023-10-27 NMAG Direct Testimony of John A. Rosenkranz.pdf;

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Greetings,

Attached is the Direct Testimony of Andrea C. Crane, Dr. Sol DeLeon, and John A. Rosenkranz on behalf of the New Mexico Attorney General in Case No. 22-00309-UT.

Very Respectfully,



*Joshua R. LaFayette*

CEPD Paralegal-A

**New Mexico Office of the Attorney General**

201 Third St. NW, Suite 300, Albuquerque NM, 87102

Office: 505-581-5052

Cell: 505-859-8477

Email: [jlafayette@nmag.gov](mailto:jlafayette@nmag.gov)

CONFIDENTIALITY NOTICE: The information in this e-mail and in any attachment may contain information that is legally privileged. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy, or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify the sender at the State of New Mexico Office of the Attorney General and delete this message. Thank you.

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF NEW MEXICO GAS )  
COMPANY, INC.'S APPLICATION FOR THE )  
ISSUANCE OF A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY TO ) Case No. 22-00309-UT  
CONSTRUCT A LIQUEFIED NATURAL GAS )  
FACILITY. )  
)  
)  
NEW MEXICO GAS COMPANY, INC., )  
)  
)  
APPLICANT. )  
\_\_\_\_\_ )**

**DIRECT TESTIMONY OF**

**DR. SOL DELEON**

**ON BEHALF OF**

**THE NEW MEXICO OFFICE OF ATTORNEY GENERAL**

## Table of Contents

I.	INTRODUCTION AND QUALIFICATIONS.....	1
II.	SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS .....	3
III.	THE NMGC PROPOSAL.....	4
IV.	FEDERAL AND STATE CLIMATE POLICIES.....	7
V.	IMPACT OF CLIMATE CHANGE REGULATION AND MARKET CHANGES ON GAS UTILITIES .....	13
VI.	CONCLUSIONS AND RECOMMENDATIONS.....	25

---

1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q Please state your name, business address, and position.**

3 **A** My name is Sol Deleon. My business address is 485 Massachusetts Ave., Suite 3,  
4 Cambridge, Massachusetts 02139. I am a Principal Associate at Synapse Energy  
5 Economics, Inc.

6 **Q Please describe Synapse Energy Economics.**

7 **A** Synapse Energy Economics is a research and consulting firm specializing in  
8 energy industry regulation, planning, and analysis. Synapse works for a variety of  
9 clients, with an emphasis on consumer advocates, regulatory commissions, and  
10 environmental advocates.

11 **Q Please describe your professional experience.**

12 **A** I have over 25 years of experience in the energy industry, primarily in U.S.  
13 natural gas distribution utilities and international merchant electricity generation. I  
14 analyze gas utility applications and filings, for testimony or in support of  
15 testimony before state public service commissions. I develop studies, reports, and  
16 other materials on decarbonization pathways, gas utility investments, and  
17 renewable portfolio standards. Prior to joining Synapse, I was a project manager  
18 at Washington Gas & Light Company, working on initiatives for corporate  
19 governance, renewable natural gas, and greenhouse gas emissions reduction.  
20 Before that, I worked for AES Corporation where I conducted commodity and  
21 financial risk analysis, derivative valuation, and project valuation for electric

---

1 generating assets in North America, South America, Europe, and Asia. I  
2 completed my Masters in Business Administration and my Doctorate in Liberal  
3 Studies at Georgetown University. My doctorate focused on energy transition and  
4 energy justice. My complete CV is attached as Exhibit NMAG Exhibit SD-1.

5 **Q Have you previously provided evidence before the New Mexico Public**  
6 **Regulation Commission (Commission)?**

7 A No.

8 **Q On whose behalf are you providing evidence in this case?**

9 A My evidence is sponsored by New Mexico Office of the Attorney General.

10 **Q What is the purpose of your testimony?**

11 A The purpose of this testimony is to critique the application of New Mexico Gas  
12 Company (NMGC or Company) for the Issuance of a Certificate of Public  
13 Convenience and Necessity (CCN) to Construct a Liquefied Natural Gas (LNG)  
14 Facility (the Application) and place it within the context of climate and  
15 decarbonization policies and developments. My testimony sets forth  
16 recommendations to ensure the evaluation of the LNG Facility considers the  
17 energy transition and decarbonization objectives.

18 **Q How is your testimony organized?**

19 A My testimony is organized as follows:

20 This Section I provides an introduction and overview of my qualifications.

---

1 Section II presents a summary of my conclusions and recommendations.

2 Section III describes the application.

3 Section IV describes federal and state climate policy and market developments  
4 that are driving energy transitions.

5 Section V discusses the impact of climate change regulation on gas utilities.

6 Section VI provides my conclusion and recommendations.

7 **II. SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS**

8 **Q Please summarize your primary conclusions.**

9 **A** (1) Federal and state climate policies and market developments are driving an  
10 energy transition that adds uncertainty in the gas utility's assumptions regarding  
11 customer growth and gas demand.

12  
13 (2) While the outcome is uncertain, the gas utility can prepare for a range of  
14 outcomes now. The utility can incorporate the uncertainty into the analysis of  
15 proposed projects and their alternatives by developing scenarios that incorporate  
16 impacts of climate policies on supply, customer demand, and customer growth  
17 assumptions.

18 (3) Proposed gas capital investments, and their alternatives, should be evaluated  
19 against a range of possible futures.

---

1       **Q Please summarize your primary recommendations.**

2       **A** 1) The Commission should not approve the plan.

3

4           2) The Commission should order NMGC to assess the LNG Facility and supply  
5           alternatives against a range of demand and supply scenarios; this assessment  
6           should properly evaluate these alternatives for stranded asset risk, greenhouse gas  
7           emission impacts, and their flexibility and ability to be adjusted to account for  
8           changes in customer growth and projected gas demand.

9       **III. THE NMGC PROPOSAL**

10       **Q Please describe the NMGC proposal.**

11       **A** NMGC submitted an application for a CCN with the Commission. NMGC is  
12       seeking authorization to construct and operate an LNG storage facility (LNG  
13       Facility) to be located in Rio Rancho, New Mexico.

14       **Q What is NMGC's rationale for the LNG Facility?**

15       **A** NMGC intends for the proposed LNG Facility to ultimately replace the Keystone  
16       Storage Facility as the utility's primary resource for gas storage. According to the  
17       Application, there will be a transition period of one to three years in which  
18       NMGC will transition all storage operations to the LNG Facility. NMGC

---

1 identifies two benefits of the LNG Facility “improve[d] reliability and a greater  
2 ability to moderate price volatility.”<sup>1</sup>

3 **Q Why is NMGP proposing to replace Keystone Storage with the proposed**  
4 **LNG Facility?**

5 **A** NMGC is described as primarily a heating-load utility, where a majority of its  
6 customers use gas to heat homes and businesses. Thus, gas demand is greater in  
7 the wintertime. Keystone Storage was used as a seasonal peaking facility,  
8 allowing NMGC to withdraw gas in the winter months to supply increased  
9 demand.

10

11 NMGC identified three issues with Keystone Storage. Two operational issues  
12 NMGC presents are: NMGC cannot always withdraw its maximum amount per  
13 day, and NMGC must plan in advance for its storage withdrawals. The third issue  
14 is financial; NMGC notes that the cost of storing gas at Keystone storage is  
15 increasing.<sup>2</sup>

16 **Q What was the Winter Storm Uri event?**

17 **A** Winter Storm Uri impacted New Mexico and parts of the southwest from  
18 February 13–17, 2021. Natural gas supply was limited due to a freeze-off in gas  
19 production fields in Texas and surrounding regions. At the same time, gas heating

---

<sup>1</sup> Application, page 3.

<sup>2</sup> Application, page 5.

---



1 loads and natural-gas-fired electricity generation increased, as customers sought  
2 to heat homes and businesses. As a result, natural gas prices in the southwest  
3 increased to record highs. NMGC was able to obtain gas to meet the needs of its  
4 customers, but the Company paid over \$100 million over six days for gas  
5 supplies. This is an amount almost equal to NMGC’s combined spend for all other  
6 months (minus February) of the 2020–2021 winter heating season.<sup>3</sup>

7 **Q What was the Commission’s response to Winter Storm Uri?**

8 **A** As a consequence of the events surrounding Winter Storm Uri, the Commission  
9 ordered NMGC to evaluate and assess “potential measures, and specifically,  
10 increased access to stored gas, including possible NMGC owned or controlled  
11 storage facilities, that may be adopted to prevent a reoccurrence of this event and  
12 the potential for extraordinary gas expenses and curtailments to customers.”<sup>4</sup>

13 **Q What was NMGC’s response?**

14 **A** On March 31, 2022, NMGC filed its compliance Filing and identified an NMGC-  
15 owned LNG Facility to be “the best option for a long-term supply reliability  
16 solution to address supply shortfalls and potential price volatility mitigation  
17 protection.”<sup>5</sup>

---

<sup>3</sup> Application, page 5-6.

<sup>4</sup> Application, page 6.

<sup>5</sup> Application, page 7.

---

1 **IV. FEDERAL AND STATE CLIMATE POLICIES**

2 **Q Please provide an overview of climate change policies in the United States.**

3 **A** Federal, municipal, and state governments (including New Mexico) are defining  
4 greenhouse gas emission reduction targets for their jurisdictions. Some targets  
5 cover all greenhouse gas emissions, whereas others cover specific gases. Some  
6 are sector-specific, whereas others are economy-wide. Some states have  
7 established legally binding requirements, while others express reductions as  
8 targets. All aim to reduce emissions by a specific percentage by a date certain.

9 **Q Are there any targets established at the federal level?**

10 **A** Yes. In 2021, the Biden administration established a new national economy-wide  
11 emissions target reduction of 50–52 percent from the 2005 level by 2030 and net  
12 zero emissions by 2050. The United States submitted this target to United  
13 Nations-led processes as its formal statement of planned emission reductions.  
14 Pathways to achieving this target are set forth in the report titled “The Long-Term  
15 Strategy of the United States: Pathways to Net-Zero Greenhouse Gas Emissions  
16 by 2050.”<sup>6</sup> The report finds that the net-zero emissions goal can be achieved  
17 through multiple pathways, but all these require five key transformation. One of  
18 the key technological transformations identified in that strategy is to “electrify  
19 most of the economy—from cars to buildings and industrial processes.”<sup>7</sup>

---

<sup>6</sup> U.S. Department of State & U.S. Exec. Office of the President, *The Long-Term Strategy of the United States: Pathways to Net-Zero Greenhouse Gas Emissions by 2050* (Nov. 2021), Available at <https://www.whitehouse.gov/wp-content/uploads/2021/10/US-Long-Term-Strategy.pdf>.

<sup>7</sup> *Id.*, at 18.

---

1

2       The plan further notes that “The key driver of reducing buildings emissions is  
3       efficient use of electricity for end uses (such as heating, hot water, cooking, and  
4       other.”<sup>8</sup> It also touches on the market share of electricity, “Within this overall  
5       decrease in energy demand, the share of electricity in final energy demand grows  
6       as end uses are electrified, from about 50% in 2020 to 90% or more by 2050  
7       because the on-site combustion of gas, oil, and other fuels decreases substantially;  
8       however, the growth is also limited through energy efficiency and efficient  
9       electrification.”<sup>9</sup>

10       **Q What are the vehicles/mechanisms/initiatives through which this goal can be**  
11       **pursued?**

12       **A** Passed in 2021, the *Infrastructure Investment and Jobs Act*<sup>10</sup> (“IIJA”) directs  
13       more than \$65 billion towards clean energy transmission to facilitate the  
14       expansion of renewable energy. Passed in 2022, the *Inflation Reduction Act*  
15       (“IRA”) includes substantial investment in climate change mitigation actions. It  
16       includes tax code modifications to support private investment in renewable energy  
17       technology, energy efficiency and low-carbon materials and buildings, federal  
18       funding for rebate programs, and loan guarantees for greenhouse gas reduction  
19       projects. The IRA includes tax credits for home electrification measures such as

---

<sup>8</sup> Id., at 32.

<sup>9</sup> Id.

<sup>10</sup> H.R.3684 -- 117th Congress (2021-2022).

---

1 heat pumps and heat pump water heaters.<sup>11</sup> The act also includes a home energy  
2 rebate program to support electrification. The High-Efficiency Electric Home  
3 Rebate Act (HEEHRA) program provides point-of-sale consumer rebates to help  
4 consumers electrify their homes. These rebates are for low- or moderate-income  
5 homeowners.<sup>12</sup> Governmental or commercial entities owning a multifamily  
6 building where the majority of the are low- or moderate-income households can  
7 also apply for rebates for electrification projects in their building.<sup>13</sup>

8 **Q Are these federal policies and programs reflective of changes in the market**  
9 **for heating systems?**

10 **A** Yes. For example, federal support for electrification and heat pumps is made  
11 possible by the growing range and performance of heat pump equipment to meet  
12 customer needs. This expanding range is reflected in increasing sales. In the  
13 United States, sales of air-source heat pumps have been steadily increasing since  
14 2015, with 2022 sales in excess of 4 million units<sup>14</sup> and exceeding gas furnace  
15 sales.<sup>15</sup>

---

<sup>11</sup> H.R.5376 -- 117th Congress (2021-2022) Sec 13301.

<sup>12</sup> H.R.5376 -- 117th Congress (2021-2022) Sec 50122 and 42 U.S.C.A. § 18795a.

<sup>13</sup> Id. § 18795a(c)(4)(C).

<sup>14</sup> Air-Conditioning, Heating, and Refrigeration Institute (AHRI). Central Air Conditioners and Air-Source Heat Pumps. Available at <https://www.ahrinet.org/analytics/statistics/historical-data/central-air-conditioners-and-air-source-heat-pumps>.

<sup>15</sup> AHRI. Furnaces Historical Data. Available at <https://www.ahrinet.org/analytics/statistics/historical-data/furnaces-historical-data>.

---

1       **Q Please discuss the climate goals and policies of the state of New Mexico.**

2       **A** In January of 2019, Governor Lujan Grisham joined the U.S. Climate Alliance, a  
3       collection of states committed to achieving the Paris Agreement’s goal of keeping  
4       global temperature increases below 1.5 degrees Celsius.<sup>16</sup> New Mexico has  
5       committed to achieving this goal by reducing collective greenhouse gas emissions  
6       by at least 45 percent by 2030 as compared to 2005 levels.<sup>17</sup>

7  
8       In March of 2019, Governor Lujan Grisham furthered New Mexico’s  
9       commitment by signing the *Energy Transition Act* into law, which established  
10      new renewable energy standards requiring renewable energy comprise no less  
11      than 40 percent of each public utility’s total retail sales of electricity to New  
12      Mexico customers by 2025. The requirement increases to 50 percent by Jan 1,  
13      2030, 80 percent by 2040, and 100 percent by 2045.<sup>18</sup> The new standards are one  
14      of the more aggressive renewable energy standards in the United States and would  
15      result in less demand for natural gas in New Mexico.

16      In 2021, New Mexico amended the Sustainable Buildings Tax Credit to provide  
17      additional tax credits for a fully electric building or for a building that is certified  
18      as zero-carbon, zero-energy, or zero-waste.<sup>19</sup> Tax credits are also available for

---

<sup>16</sup> Exec. Order on Addressing Climate Change and Energy Waste Prevention, No. 2019-003 (Jan. 29, 2019), [https://www.governor.state.nm.us/wp-content/uploads/2019/01/EO\\_2019-003.pdf](https://www.governor.state.nm.us/wp-content/uploads/2019/01/EO_2019-003.pdf).

<sup>17</sup> Id.

<sup>18</sup> SB 489 54<sup>th</sup> Legislature First Session (New Mexico, 2019). Sec 29. Available at <https://www.nmlegis.gov/Sessions/19%20Regular/bills/senate/SB0489.pdf>.

<sup>19</sup> HB 15 Regular Session (New Mexico, 2021) Sec 2. Available at <https://www.nmlegis.gov/Sessions/21%20Regular/final/HB0015.pdf>.

---

1 buildings that install Energy Star air-source heat pumps, ground-source heat  
2 pumps, and heat pump water heaters.

3  
4 A 2021 report from the New Mexico Climate Change Task Force<sup>20</sup> finds that with  
5 all of New Mexico's existing policies and newly proposed policies, as of the  
6 publication of the report, New Mexico will reduce emissions by 31 million metric  
7 tons and 17.3 million metrics tons, respectively. This is still 16.4 million metrics  
8 tons short of meeting the 2030 goal of 45 percent lower emissions, from a 2005  
9 baseline.

10 **Q How is the state planning to achieve its decarbonization goals?**

11 **A** The New Mexico Climate Change Task Force will lay out action plans to achieve  
12 the state's decarbonization goals in a forthcoming report. While this report has not  
13 been released, the Technical Advisory Group<sup>21</sup> provided recommendations in  
14 Input on New Mexico's Climate Goals and Implementing Actions.<sup>22</sup>

15  
16 The task force included proposals to support the decarbonization of the buildings  
17 sector. These proposals include the following:

---

<sup>20</sup> New Mexico Interagency Climate Change Task Force. 2021. *Progress and Recommendations*. Page 5. Available at [https://www.climateaction.nm.gov/wp-content/uploads/sites/39/2023/07/NMClimateChange\\_2021\\_final.pdf](https://www.climateaction.nm.gov/wp-content/uploads/sites/39/2023/07/NMClimateChange_2021_final.pdf)

<sup>21</sup> The Technical Advisory Group was convened by the New Mexico Climate Change Task Force in the Spring of 2022. It was tasked to assess the climate goals and implementing actions, offer ideas to strengthen and fill in any gaps the implementing actions.

<sup>22</sup> Technical Advisory Group. Input on New Mexico's Climate Goals and Implementing Actions. June 2022. Available at [https://www.climateaction.nm.gov/wp-content/uploads/sites/39/2023/09/2022\\_06\\_30-FINAL-CCTF-TechnicalAdvisoryGroupReport.pdf](https://www.climateaction.nm.gov/wp-content/uploads/sites/39/2023/09/2022_06_30-FINAL-CCTF-TechnicalAdvisoryGroupReport.pdf).

---

- 1           1. Establish legislation requiring 100 percent fuel-switching of gas space and  
2           water heating systems at end-of-life by 2023.
  
  - 3           2. Electrify one-third of the space and water heating in buildings by 2030 by  
4           providing financing and incentives.
  
  - 5           3. Establish a building performance standard that drives a 33 percent reduction  
6           in commercial gas consumption by 2030.
  
  - 7           4. Develop and incentivize the adoption of an all-electric, net-zero carbon stretch  
8           code that is adopted by municipalities representing 50 percent of New  
9           Mexico’s population by 2025.
  
  - 10          5. To reduce energy demand, improve building efficiency and ensure New  
11          Mexico implements the most up-to-date building/energy codes.
  
  - 12          6. Set appliance and fixture efficiency standards that exceed basic federal  
13          efficiency standards.
  
  - 14          7. Use legislation to redesign utility rates by 2023 so that electrification is cost-  
15          effective on a lifecycle basis for 90 percent of residential customers.
  
  - 16          8. Capture electrification opportunities in new buildings through building codes  
17          and standards, those requiring new buildings to be all-electric or “ready to  
18          electrify,” prioritizing access to resources and support for marginalized  
19          communities.
-

1           9. Establish new and enhanced utility incentives for energy efficiency and  
2            electrification.<sup>23</sup>

3   **V.     IMPACT OF CLIMATE CHANGE REGULATION AND MARKET**  
4   **CHANGES ON GAS UTILITIES**

5   **Q Please explain how climate policies can impact gas utility operations and**  
6   **decisions?**

7   **A** Policies that drive energy efficiency and building decarbonization can result in  
8       gas consumption that is lower than historical averages and can affect customer  
9       growth or retention. Gas utilities will need to assess the implications of and  
10      manage the impact of policies that incentivize the reduction of gas consumption,  
11      as well as any market changes that result in changes in consumer appetite for gas  
12      equipment. Thus, utilities should revisit the assumptions regarding long-term  
13      customer growth or retention.

14      The impact of policies on long-term demand has implications for capital  
15      investment decisions. Natural gas assets, such as the LNG facility proposed in this  
16      application, have useful lives that span decades. Evaluation of natural gas  
17      investments should consider the potential impact of climate and decarbonization  
18      goals.

---

<sup>23</sup> Id., pages 16-22.

---



1       **Q Are these risks recognized by NMGC and its parent corporation?**

2       **A** Emera, the parent company of NMGC, established the following climate goals: 55  
3       percent reduction in carbon dioxide emissions by 2025 (2005 baseline), 80  
4       percent reduction in carbon dioxide emissions (2005 baseline) and the last coal  
5       unit retired no later than 2040, and net-zero by 2050.<sup>24</sup> In addition to its climate  
6       targets, Emera also recognizes climate-related risks. In the 2022 Sustainability  
7       Report, under policy and legal risks, Emera identifies “restrictions on new natural  
8       gas hookups,” further noting that a potential impact will be “reduced growth in  
9       natural gas utilities.”<sup>25</sup> In the same table, under chronic physical risk, Emera  
10      identifies “change in customer demand patterns impacting related revenue.”<sup>26</sup>

11      **Q Has NMGC factored in the impact of climate policies on customer growth for**  
12      **this application?**

13      **A** No. An intervenor delivered a set of interrogatories on the topic of Emera’s goal  
14      of net-zero greenhouse gas emissions by 2050 and the targets outlined by New  
15      Mexico’s Climate Action Task Force (including the establishment of legislation  
16      requiring 100 percent fuel-switching of gas space and water heating systems at  
17      end of life). The intervenor posed the following question: “Do NMGC’s annual  
18      gas customer growth forecast and peak gas demand forecast consider the impact  
19      of the above climate policies? If not, how would NMGC’s projected customer and

---

<sup>24</sup> Emera Inc., 2022 Sustainability Report, page 19.

<sup>25</sup> Id., page 30.

<sup>26</sup> Id.

---

1 demand growth rates change if NMGC did incorporate these policies? How would  
2 this impact the projected customer rate and bill impact of the LNG project over  
3 the lifetime of the facility?”<sup>27</sup> The Company responds that “NMGC’s annual gas  
4 customer growth forecast and peak gas demand forecast are based on forecasting  
5 forward from current known impacts on demand. The policies referenced do not  
6 supersede NMGC’s statutory obligation to serve customers, and therefore do not  
7 influence NMGC’s current customer growth forecast.”<sup>28</sup>

8 **Q Can climate policies affect utilities and the appropriate regulation thereof?**

9 **A** Decarbonization of buildings and industrial sectors will transform gas utilities and  
10 require changes in regulation and business models. This transition is in its early  
11 stages, and there are numerous competing visions for how to resolve the  
12 challenges. The form of the resolution will vary among states and utilities, driven  
13 by history, climate, technology development and market acceptance, economic  
14 structure of the states, the state of the gas system, and public policy choices.

15 **Q Are there states that have initiated proceedings that address gas capital**  
16 **investment decisions in light of the decarbonization transition?**

17 **A** Yes, below I describe a sample of regulatory proceedings opened across the  
18 United States that address the impact of climate policy on gas utilities. The  
19 examples below are meant to provide a description of some of the issues being

---

<sup>27</sup> Response to CCAE 1-1.

<sup>28</sup> Response to CCAE 1-1.

---

1 discussed in other jurisdictions.

2 **Colorado**

3 In June 2021, the Colorado Governor signed into law SB21-264, which, among  
4 other requirements, mandates that gas distribution utilities file a “clean heat plan”  
5 with the Colorado Public Utilities Commission (“Colorado PUC”) demonstrating  
6 how the utilities will use clean heat resources to meet specific greenhouse gas  
7 reduction targets by 2030.<sup>29</sup> As part of that process, the Colorado PUC initiated a  
8 rulemaking proceeding to address gas utility planning. Specifically, in Decision  
9 C22-0760, the Colorado PUC directed gas utilities to file Clean Heat Plans  
10 starting in 2023. These plans are to include a mix of supply-side and demand-side  
11 resources such as energy efficiency programs, recovered methane, green  
12 hydrogen, and beneficial electrification. In addition, noting that SB21-264 and the  
13 clean heat plan rules “will not address all of the issues that gas utilities and its  
14 customers will face through the transitions required to meet Colorado’s goals,”  
15 the Colorado PUC also proposed new Gas Infrastructure Planning Rules “to  
16 improve the Commission’s visibility into a gas utility’s future projects and  
17 expenditures.”<sup>30</sup>

18 **Massachusetts**

19 In Docket 20-80, the Massachusetts Department of Public Utilities directed the  
20 state’s gas utilities to hire consultants to analyze strategies to achieve net-zero

---

<sup>29</sup> Decision No. C22-0760, Colorado PUC Proceeding No. 21R-0449G (Nov. 2022),  
[https://www.dora.state.co.us/pls/efi/EFI\\_Search\\_UI.Show\\_Decision?p\\_session\\_id=&p\\_dec=29605](https://www.dora.state.co.us/pls/efi/EFI_Search_UI.Show_Decision?p_session_id=&p_dec=29605).

<sup>30</sup> Id.

---

1 emissions, adding greater detail and alternative approaches to those captured in  
2 the state's 2050 Roadmap study. The consultants' analysis built upon the state's  
3 2050 Roadmap, and the pathways analysis included the following outputs: Rate  
4 base and revenue requirements over time, customer costs and qualitative  
5 discussion of impacts on choices; and quantification of the impacts of targeted  
6 electrification to allow asset retirement.

7 The follow-on regulatory analysis identified options and approaches available to  
8 address the issues raised in the pathways analysis, including minimizing or  
9 avoiding gas infrastructure projects to reduce costs that need to be recovered from  
10 gas system customers through methods such as geographically targeted  
11 electrification, non-pipeline alternatives to pipeline replacement, and networked  
12 geothermal systems. The consultants also suggested formal review and pre-  
13 approval for capital investments, the coordination of electric and gas system  
14 planning to support reliability and resilience of the electric grid during the  
15 transition, and a review of line extension policies and practices to reduce the risk  
16 of ratepayer support for uneconomic pipeline expansions.

17

**18 New York**

19 The New York Public Service Commission initiated Case 20-G-0131 pertaining  
20 to a modernized gas planning process that links gas planning to the state's climate  
21 legislation. In a May 2022 order, the Public Service Commission ordered gas  
22 utilities to file long-term gas plans, proposals for non-pipe alternative screening  
23 criteria and non-pipe alternative suitability criteria, non-pipe cost recovery

---

1 procedures and incentive mechanisms, and depreciation studies.<sup>31</sup> Analyses  
2 underlying each long-term plan must consider energy efficiency and non-pipeline  
3 alternatives, and the utility must include a non-pipeline-alternatives-only scenario  
4 unless it presents sufficient evidence that a non-pipeline-alternatives-only  
5 scenario is not feasible. As required by this order, utilities must compare  
6 alternatives based on benefit-cost analysis, bill impact analysis, and emissions  
7 impacts.

8 **Q Why are other proceedings in other states relevant to New Mexico?**

9 **A** These proceedings matter because they illustrate the fact that regulators, utilities,  
10 and other stakeholders in multiple jurisdictions are thinking about the impact of  
11 decarbonization goals and market developments on gas utilities. It is important to  
12 be aware of the questions being asked, the analysis being conducted, and the  
13 decision-making process being modeled elsewhere. The regulators, utilities, and  
14 ratepayers of New Mexico can reflect on the process and the analyses and  
15 determine what parts of these other jurisdictions' initiatives, policies, and  
16 processes are relevant to the state.

---

<sup>31</sup> Order Adopting Gas System Planning Process, NY PSC Docket No. 20-G-0131, 64-67 (May 12, 2022), <https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=20-G-0131&CaseSearch=Search>.

---

1       **Q Have other utilities taken steps to address the potential impact of climate**  
2       **policies?**

3       **A** Yes. Below are a few examples of the range of programs and initiatives that gas  
4       utilities are exploring.

5  
6       **Consolidated Edison Company of New York, Inc. (ConEd)**

7       ConEd proposed a program called Smart Solutions for Natural Gas Customers to  
8       address increased demand and limited pipeline capacity for natural gas in its  
9       service territory. This proposal aims to decrease gas usage and procure alternative  
10      resources to meet customer heating and other thermal needs. Included in this  
11      program is a Gas Demand Response Pilot aimed at reducing net customer demand  
12      during the entirety of a peak gas demand day.<sup>32</sup>

13  
14      **National Grid**

15      National Grid in New York committed to providing an emissions analysis and  
16      analysis of non-pipeline alternatives as part of its next rate case.<sup>33</sup>

17  
18      **NSTAR Gas Company (Eversource Energy)**

19      Eversource is piloting a geothermal project to demonstrate the potential for

---

<sup>32</sup> Gas Demand Response Report on Pilot Performance, NY PSC Docket No. 17-G-0606 (July 15, 2022), <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7bAD51AA7B-5BD2-4A9B-AE57-720C636ED6C0%7d>.

<sup>33</sup> Joint Proposal, NY PSC Docket No. 19-G-0309 (May 14, 2021), <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7b049A7777-4BE8-41FC-B958-6D9EE1C13DD3%7d>.

---

1 networked geothermal in a mixed-use urban neighborhood, serving customers  
2 with diverse heating and cooling profiles. The Massachusetts Department of  
3 Public Utilities found the proposal to be in line with the Commonwealth’s climate  
4 goals and directed the company to study the scalability of networked geothermal  
5 to serve existing gas customers.<sup>34</sup>

6 **Q What does NMGC say about the application’s consistency with climate**  
7 **policy?**

8 **A** This was addressed by NMGC Witness Reed, who notes that “while there is no  
9 definitive path that gas demand will take as a result of climate change policies, I  
10 believe that most existing natural gas load will continue to need to be served for  
11 the next 20 years or more. Therefore, it is likely that the LNG Facility will  
12 continue to provide reliability and price benefits to customers for multiple  
13 decades and will not likely result in stranded costs.”<sup>35</sup>

14 **Q Do you have any concerns about Witness Reed’s assertions?**

15 **A** Yes. The fact that there is no definitive path for gas demand means it is all the  
16 more important to prepare for a range of potential outcomes and to begin planning  
17 now. Capital investment proposals should be assessed against a range of future  
18 states and not solely on a forecast based on the extension of past trends. This kind  
19 of analysis will provide transparency into the tradeoffs embedded in the

---

<sup>34</sup> Order, MA DPU Docket No. 19-120 (Oct. 30, 2020), <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/12834214>.

<sup>35</sup> Testimony of John J. Reed, page 25.

---

1 proposals. Such analysis will be able to answer questions such as: Will one  
2 alternative be more cost-effective while another alternative would provide more  
3 flexibility in the future, but at an additional cost?

4 **Q What other supporting evidence did Witness Reed provide?**

5 A Witness Reed provided examples of recently constructed or recently approved  
6 LNG facilities. These include recently built LNG facilities in Washington state,  
7 North Carolina, Arizona, and Pennsylvania, plus proposed facilities in Utah,  
8 Georgia, Wisconsin, Rhode Island, and Minnesota.<sup>36</sup>

9 **Q What is your response to this?**

10 A The LNG facilities referenced were recently constructed or approved. These  
11 facilities were approved in the context of a specific state, location, and utility.  
12 These references, therefore, cannot replace appropriate evaluation considering the  
13 specific concerns of the New Mexico ratepayers and NMGC. They are relevant  
14 because New Mexico can learn from or review the analytical requirements and the  
15 process that they went through to get the approval to construct.

16  
17 Looking at the Wisconsin LNG project as an example: the utility provided an  
18 evaluation of two system alternatives.<sup>37</sup> Extensive analysis was also conducted:  
19 *“The applicants performed three analyses to evaluate the overall economic*

---

<sup>36</sup> Id., pages 29-37.

<sup>37</sup> Final Decision. Public Service Commission of Wisconsin Docket No. 5-CG-106 (Dec 22, 2021), page 15.

---



1       *benefit of the project: a scenario analysis that considered alternative planning*  
2       *assumptions under different load growth scenarios, including low, base, and high*  
3       *growth rates; a sensitivity analysis that determined how different values of an*  
4       *independent variable such as planning assumptions affected the economic value*  
5       *that the project would provide; and a risk analysis that was an extension of the*  
6       *sensitivity analysis but incorporated a complete enumeration of all changes in the*  
7       *independent variables and quantifies the potential cost to customers across*  
8       *almost 4,000 different unique scenarios.”<sup>38</sup>*

9       **Q Witness Reed argues that the LNG Facility will not likely result in stranded**  
10       **costs. What are stranded costs?**

11       **A** Stranded costs are investments made that become unneeded, uneconomic, or  
12       unviable due to changing circumstances. Such circumstances can include new  
13       government regulations, changes in interpretation or application of existing law,  
14       technological breakthroughs, changes in consumer choice, or environmental  
15       changes.<sup>39</sup> Assets resulting from these investments can be at risk of early write-  
16       offs, revaluation, or conversion from asset to liabilities.<sup>40</sup> It can be appropriate for  
17       regulators to allow for the utility to recover the remaining costs of prudent  
18       investments even in the event that changes result in the assets being stranded.  
19       However, ratepayers should not be responsible for funding the stranded costs

---

<sup>38</sup> Id., page 16.

<sup>39</sup> Roberts, Tracey, Stranded Assets and Efficient Pricing for Regulated Utilities: A Federal Tax Solution (August 27, 2019). 11 Columbia Journal of Tax Law 1 (2019), Available at SSRN: <https://ssrn.com/abstract=3443927>.

<sup>40</sup> Id.

---

1 associated with investments that were made imprudently because the utility failed  
2 to consider all information known at the time it made the investment decision  
3 (including information about alternatives).

4 **Q Is stranded asset risk relevant to the LNG facility?**

5 **A** Yes, stranded asset risk is relevant to the proposed LNG facility. As discussed  
6 earlier in this testimony, changes in regulation or changes in the market and  
7 consumer preference or technological improvements, can lead to a reduction in  
8 gas throughput or a reduction of natural gas residential and commercial  
9 consumers. NMGC should analyze these risks and quantify their likelihood and  
10 impact. As part of the application, NMGC provided the monthly bill impact of the  
11 LNG facility assuming 20-, 30-, and 40-year depreciation periods. This is  
12 important analysis but is incomplete. The proposed facility should be assessed in  
13 context of other alternatives considered.

14 **Q Has the Company evaluated the impact of the LNG facility on greenhouse**  
15 **gas emissions?**

16 **A** No. In response to interrogatories, NMGC responded that it has not “conducted  
17 any kind of cumulative impact analysis of direct or indirect greenhouse gas  
18 emissions that will result in the fugitive release or combustion of LNG.”<sup>41</sup> In  
19 addition, when asked if NMGC employed consistent and comprehensive  
20 internationally-accepted methodologies to estimate greenhouse gas emissions

---

<sup>41</sup>Response to NEE 1-11.

---

1 from the proposed LNG Facility, NMGC responded that it “is not in a position to  
2 [reasonably] estimate the [greenhouse gas] emissions from this specific plant  
3 since the plant is in its design phase prior to construction.”<sup>42</sup>

4 **Q Is this a concern?**

5 **A** Yes. Greenhouse gas emissions from the LNG facility could have a detrimental  
6 impact on New Mexico’s objective to achieve a statewide reduction in greenhouse  
7 gas emissions of at least 45 percent by 2030.

8 **Q What does NMGC say about low-carbon alternatives?**

9 **A** Witness Reed writes that “low or no-carbon alternatives, such as energy  
10 efficiency are currently not available at the scale necessary to replace the service  
11 that will be provided by the proposed LNG Facility.”<sup>43</sup>

12 **Q Is this a sufficient response?**

13 **A** No. This answer implies that only one alternative at a time has been evaluated.  
14 However, this analysis is incomplete. NMGC should consider if a combination of  
15 alternatives can replace the proposed LNG facility or cause it to be designed  
16 differently.

---

<sup>42</sup> Response to NEE 1-15.

<sup>43</sup> John J. Reed Testimony, page 24.

---

1       **Q Are there any concerns about the level of analysis NMGC undertook to**  
2       **prepare for the application?**

3       **A** Witness Rosenkranz in his testimony raised concerns about the analysis  
4       conducted. He finds that, “NMGC has not shown that the LNG Facility proposal  
5       is the most cost-effective option for meeting the defined need. NMGC decided to  
6       replace Keystone Storage service with a large LNG storage and peaking facility  
7       without examining a full range of available gas resource alternatives or  
8       considering that the best option may involve a mix of resources.”<sup>44</sup>

9       **Q What are the implications of these concerns?**

10      **A** The implications are that there are multiple analyses missing from the application:  
11      an analysis of alternatives, including an evaluation of the stranded asset risk, and  
12      an analysis of the greenhouse gas emission impact of the facility and the  
13      alternatives.

14   **VI. CONCLUSIONS AND RECOMMENDATIONS**

15      **Q What are your conclusions?**

16      **A** (1) Federal and state climate policies and market developments are driving an  
17      energy transition that adds uncertainty in the gas utility’s assumptions regarding  
18      customer growth and gas demand.

---

<sup>44</sup> John Rosenkranz Testimony, page 2.

---

1

2 (2) While the outcome is uncertain, the utility can prepare for a range of outcomes  
3 now. The utility can incorporate the uncertainty into the analysis of proposed  
4 projects and their alternatives by developing scenarios that incorporate impacts of  
5 climate policies on supply, customer demand, and customer growth assumptions.

6

7 (3) Proposed gas capital investments and the alternatives to this should be  
8 evaluated against a range of possible futures.

9 **Q What are your recommendations?**

10 **A** 1) The Commission should not approve the plan.

11

12 2) The Commission should order NMGC to assess the LNG Facility and supply  
13 alternatives against a range of demand and supply scenarios; this assessment  
14 should properly evaluate these alternatives for stranded asset risk, greenhouse gas  
15 emission impacts, and their flexibility and ability to be adjusted to account for  
16 changes in customer growth and projected gas demand

17 **Q Does this conclude your testimony?**

18 **A** Yes, it does.

19

---

---

**Dr. Maria Soledad (Sol) deLeon, D.L.S., Principal Associate**

---

Synapse Energy Economics | 485 Massachusetts Avenue, Suite 3 | Cambridge, MA 02139 | 617-453-7023  
sdeleon@synapse-energy.com

**PROFESSIONAL EXPERIENCE**

**Synapse Energy Economics, Inc., Cambridge, MA. *Principal Associate*, January 2023 – Present**

- Analyzes gas utility applications, as well as studies, reports and other evidence regarding gas utility investments, business models, ratemaking, depreciation, revenue requirements, and business risk.
- Sponsors testimony and performs analysis related to impact of climate regulation on utilities.
- Researches policies and practices regarding rulemaking related to renewable portfolio standards.

**WGL Holdings (Washington Gas) Washington D.C. *Manager, Strategy & Innovation*, December 2019 – December 2022, *Manager, Strategy & Business Development*, March 2017 – December 2019**

- Defined and successfully proposed GHG emission reduction targets. Project managed development and completion of regulator-required climate strategy reports, involving external consultants and internal subject matter experts.
- Established and implemented a governance process for strategic initiatives. Created templates for business plans, project charters, and status updates for proposed strategic projects.
- Established information capture process for regulatory and executive reporting of emission reduction initiatives, including status of budget, scope, schedule, and projected benefits.

**AES Corporation, Arlington, VA. *Risk Manager*, January 2009 – January 2016, *Project Manager, Wind Development*, April 2008 – December 2008, *Risk Analyst*, March 2006 – March 2008**

- Managed global Hydrology Risk Committee quantifying risks and reporting to executive leaders on hydrology and climate mitigation strategy to reduce impact on initiatives and earnings projections.
- Streamlined process for derivatives valuation and audit support, reducing quarterly reporting preparation by 400% and saving 10,000+ labor hours. Managed derivative approval process for projects in Latin America, and Asia.
- Supported business development and negotiations for greenfield wind farms and project pipelines by building and maintaining financial models.
- Mapped South American and Asian subsidiaries' structures and cash flows to identify material risks and develop interest rate and foreign exchange hedging strategies protecting enterprise value.
- Developed valuation models for futures, forwards and options for power, commodity, FX, and interest rate; identified and evaluated transaction risks, and performed ad hoc market risk analysis.

**Energy and Environment Analysis, Inc.**, Arlington, VA. *Energy Analysis*, August 2002– March 2006

- Built first-ever demand forecasting model of U.S. propane industry, fundamentally changing strategic decision-making across the propane industry.

**PG&E National Energy Group**, Bethesda, MD. *Intern, Asset Management*, June 2001– December 2001

- Fixed financial models for power plant valuations and financial models for 5,000-megawatt contract portfolio; corrected errors in 5 critical models which were reinstated for internal forecasting and reporting.

**Trans Asia Power**, Manila, Philippines, *Senior Project Analyst, Business Development*, March 1997 – August 2000

- Employee #4 of energy start-up. Identified projects for development. Company representative in nationwide launch of electricity spot market, implemented in company and trained other users.

## EDUCATION

**Georgetown University**, Washington, D.C.

Doctorate in Liberal Studies, Energy Transition and Energy Justice

Master of Business Administration, McDonough School of Business

**Ateneo de Manila University**, Quezon City, Philippines

Bachelor of Science, Management Engineering, AB Economics

## TESTIMONY

**Illinois Commerce Commission** (Docket No. 23-069): Direct testimony and rebuttal testimony of Sol DeLeon in The People’s Gas Light and Coke Company’s Proposed General Increase in Rates for Gas Delivery Service. On behalf of the City of Chicago. May 9, 2023.

## TESTIMONY ASSISTANCE

**Maryland Public Service Commission (Case No. 9692)**: Direct testimony of Asa Hopkins regarding the application of Baltimore Gas and Electric Company for an Electric and Gas Multi-Year Plan. On behalf of the Maryland Office of People’s counsel, August 25, 2023.

**Maryland Public Service Commission (Case No. 9692)**: Direct testimony of Courtney Lane regarding the application of Baltimore Gas and Electric Company for an Electric and Gas Multi-Year Plan. On behalf of the Maryland Office of People’s counsel, August 25, 2023.

**Nova Scotia Utility and Review Board** (Matter No. N10960): Direct testimony of Eric Borden regarding Eastward Energy Incorporated’s schedule of rates, tolls, and charges pursuant to Section 21 of the Gas Distribution Act. On behalf of the Counsel to the Nova Scotia Utility and Review Board. April 12, 2023.

**New York Public Service Commission (Case 22-G-0610):** Initial comments of the Natural Resources Defense Council regarding the Long-Term Gas System Plan of National Fuel Gas Distribution Corporation. March 13, 2023.

*Resume updated October 2023*



**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF NEW MEXICO GAS )  
COMPANY, INC.’S APPLICATION FOR THE )  
ISSUANCE OF A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY TO )  
CONSTRUCT A LIQUEFIED NATURAL GAS )  
FACILITY. )  
NEW MEXICO GAS COMPANY, INC., )  
APPLICANT. )**

---

**Case No. 22-00309-UT**

**AFFIRMATION (IN LIEU OF AFFIDAVIT)  
OF DR. SOL DELEON**

In compliance with the *Temporary NMPRC Electronic Filing Policy of March 20, 2020*, and under Rule 1-011(B) NMRA of the New Mexico Rules of Procedures for the District Courts, I, Sol Deleon, hereby file this Direct Testimony on behalf of the New Mexico Office of Attorney General and state as follows:

I hereby affirm in writing under penalty of perjury under the laws of the State of New Mexico that the statements contained in the foregoing *Direct Testimony of Dr. Sol Deleon on Behalf of the Office of Attorney General* are true and correct to the best of my knowledge, information, and belief.

I further declare under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2023.

/s/ Sol Deleon  
Sol Deleon (electronically signed)  
Expert Witness on Behalf of the New Mexico Attorney General  
485 Massachusetts Ave., Suite 3,  
Cambridge, Massachusetts 02139

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF NEW MEXICO GAS )  
COMPANY INC.'S APPLICATION FOR THE )  
ISSUANCE OF A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY TO )  
CONSTRUCT A LIQUIFIED NATURAL GAS )  
FACILITY. )  
)  
NEW MEXICO GAS COMPANY, INC., )  
)  
  ) **APPLICANT.** )  
\_\_\_\_\_ )**

**Case No. 22-00309-UT**

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on this date I served upon the parties and individuals listed below, via email, a true and correct copy of the **Direct Testimony of Dr. Sol Deleon.**

PRC Records Management Bureau	<a href="mailto:prc.records@prc.nm.gov">prc.records@prc.nm.gov</a> ;
Ana Kippenbrock	<a href="mailto:ana.kippenbrock@prc.nm.gov">ana.kippenbrock@prc.nm.gov</a> ;
<b>NMGC</b>	
Thomas M. Domme	<a href="mailto:tmd@jhkmlaw.com">tmd@jhkmlaw.com</a> ;
Brian Haverly	<a href="mailto:bjh@jhkmlaw.com">bjh@jhkmlaw.com</a> ;
Julianna T. Hopper	<a href="mailto:jth@jhkmlaw.com">jth@jhkmlaw.com</a> ;
Rebecca Carter	<a href="mailto:rebecca.carter@nmgco.com">rebecca.carter@nmgco.com</a> ;
Anita L. Hart	<a href="mailto:anita.hart@nmgco.com">anita.hart@nmgco.com</a> ;
Gerald Weseen	<a href="mailto:gerald.weseen@nmgco.com">gerald.weseen@nmgco.com</a> ;
Nicole V. Strauser	<a href="mailto:nicole.strauser@nmgco.com">nicole.strauser@nmgco.com</a> ;
<b>NM Attorney General</b>	
Gideon Elliot	<a href="mailto:gelliot@nmag.gov">gelliot@nmag.gov</a> ;
Maria Oropeza	<a href="mailto:morepeza@nmag.gov">morepeza@nmag.gov</a> ;
Andrea Crane	<a href="mailto:ctcolumbia@aol.com">ctcolumbia@aol.com</a> ;
Joshua LaFayette	<a href="mailto:Jlafayette@nmag.gov">Jlafayette@nmag.gov</a> ;
<b>NEE</b>	
Mariel Nanasi	<a href="mailto:mariel@seedsbeneaththesnow.com">mariel@seedsbeneaththesnow.com</a> ;
Christopher Dodd	<a href="mailto:chris@doddnm.com">chris@doddnm.com</a> ;
<b>WRA</b>	
Cydney Beadles	<a href="mailto:cydney.beadles@westernresources.org">cydney.beadles@westernresources.org</a> ;
Caitlin Evans	<a href="mailto:caitlin.evans@westernresources.org">caitlin.evans@westernresources.org</a> ;
Aaron Gould	<a href="mailto:aaron.gould@westernresources.org">aaron.gould@westernresources.org</a> ;

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

Official Service List

Case No. 22-00309-UT

<b>CCAЕ</b>	
Cara R. Lynch Charles de Saillan Don Hancock	<a href="mailto:lynch.cara.NM@gmail.com">lynch.cara.NM@gmail.com</a> ; <a href="mailto:desaillan.ccae@gmail.com">desaillan.ccae@gmail.com</a> ; <a href="mailto:sricdon@earthlink.net">sricdon@earthlink.net</a> ;
<b>PRC – ADVOCACY STAFF</b>	
Elisha Leyba-Tercero David Black Marc Tupler Christopher Dunn Gabriella Dasheno Ed Rilkoff Brad Borman Elizabeth Ramirez Jack Sidler Peggy Martinez-Rael	<a href="mailto:elisha.leyba-tercero@prc.nm.gov">elisha.leyba-tercero@prc.nm.gov</a> ; <a href="mailto:david.black@prc.nm.gov">david.black@prc.nm.gov</a> ; <a href="mailto:marc.tupler@prc.nm.gov">marc.tupler@prc.nm.gov</a> ; <a href="mailto:christopher.dunn@prc.nm.gov">christopher.dunn@prc.nm.gov</a> ; <a href="mailto:gabriella.dasheno@prc.nm.gov">gabriella.dasheno@prc.nm.gov</a> ; <a href="mailto:ed.rilkoff@prc.nm.gov">ed.rilkoff@prc.nm.gov</a> ; <a href="mailto:bradford.borman@prc.nm.gov">bradford.borman@prc.nm.gov</a> ; <a href="mailto:elizabeth.ramirez@prc.nm.gov">elizabeth.ramirez@prc.nm.gov</a> ; <a href="mailto:jack.sidler@prc.nm.gov">jack.sidler@prc.nm.gov</a> ; <a href="mailto:peggy.martinez-Rael@prc.nm.gov">peggy.martinez-Rael@prc.nm.gov</a> ;
<b>PRC - OGC</b>	
Scott Cameron Robert Lundin Erika Avila Stephanz LaurieAnn Santillanes	<a href="mailto:scott.cameron@prc.nm.gov">scott.cameron@prc.nm.gov</a> ; <a href="mailto:Robert.lundin@prc.nm.gov">Robert.lundin@prc.nm.gov</a> <a href="mailto:Erika.stephanz@prc.nm.gov">Erika.stephanz@prc.nm.gov</a> ; <a href="mailto:Laurieann.santillanes@prc.nm.gov">Laurieann.santillanes@prc.nm.gov</a> ;

**DATED** this 27<sup>th</sup> day of **October 2023**.

**Respectfully submitted,**  
**NEW MEXICO ATTORNEY GENERAL’S OFFICE**

**RAÚL TORREZ**  
**Attorney General**

/s/ Gideon Elliot  
**Gideon Elliot**  
**Assistant Attorney General**  
**(505) 490-4052**  
**gelliot@nmag.gov**

**Post Office Drawer 1508**  
**Santa Fe, NM 87504**