

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

JOINT PETITION REQUESTING THE)	
PUBLIC REGULATION COMMISSION)	
INITIATE, CONDUCT AND OVERSEE A STUDY)	
TO DETERMINE THE PUBLIC, RATEPAYER,)	
ENVIRONMENTAL, AND ECONOMIC BENEFITS AND)	Case No.
COSTS AS WELL AS THE TECHNICAL FEASIBILITY)	
OF STATE-LEVEL PUBLIC UTILITY MODELS FOR)	
THE STATE OF NEW MEXICO)	
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**JOINT PETITION REQUESTING THE PUBLIC REGULATION COMMISSION
INITIATE, CONDUCT AND OVERSEE A STUDY TO DETERMINE THE PUBLIC,
RATEPAYER, ENVIRONMENTAL, AND ECONOMIC BENEFITS AND COSTS AS WELL
AS THE TECHNICAL FEASIBILITY OF STATE-LEVEL PUBLIC UTILITY MODELS
FOR THE STATE OF NEW MEXICO**

By this Petition, Joint Petitioners, request that the New Mexico Public Regulation Commission (“PRC” or “Commission”) initiate, cause to be conducted, and supervise, a study to identify and evaluate the opportunities and challenges of publicly-owned electrical power for the State of New Mexico, with local control, pursuant to Commission Rules §1.2.2.22 and based on the Commission’s regulatory and supervisory authority under NMSA 1978, §§ 8-8-4. A and B(7), (10), and (11), 62-3-1B, 62-3-3.H, 62-6-4.A, 62-8-1, 62-8-7A, 62-10-1, and 62-16.4.A, B(2)-(4), and D (Renewable Energy Act; Renewable Portfolio Standard). It is in the public interest and well within the Commission’s *express* authority to evaluate whether it would or would not benefit New Mexico and New Mexicans if the State and its residents owned the facilities necessary for delivery of electrical power to the public. Joint Petitioners reasonably believe that it is probable that public ownership of the electrical utilities that serve New Mexico (hereinafter, “public power”) would benefit New Mexico’s ratepayers, New Mexico’s

businesses, and New Mexico's state, local and tribal governments. Accordingly, Petitioners are requesting that the PRC instigate and conduct a formal study to reasonably analyze all the issues related to public power in the exercise of the PRC's authority to regulate and supervise electricity rates, to effectuate the Renewable Energy Act and to ensure electricity shall be available in New Mexico at fair, just and reasonable rates.

For the reasons set forth below, Joint Petitioners request that the Commission find that:

- (i) The Commission has jurisdiction over the matters addressed herein; and
- (ii) It would benefit the state and residents of New Mexico if the PRC initiated, conducted and supervised a formal study of two public power models for New Mexico in comparison with the status quo: to determine the costs and benefits of public power including, without limitation, the pathways to public power (both a state owned and operated electric power authority with municipal and tribal local control over generation) and Community Choice Aggregation (also known as Local Choice Energy, where the investor-owned-utilities maintain the transmission and distribution with the option for municipal and tribal control over generation) and whether implementation of public power will promote and protect the public interest, reduce and stabilize electricity rates, generate revenue for the state, facilitate the deployment of 100% renewables plus storage and enhance local economic benefits.

In support of this Petition, as more thoroughly spelled out below, Petitioners allege:

1. The passage of the Energy Transition Act ("ETA"),¹ and in conjunction with the IPCC reports,² UN Declarations,³ and Lancet,⁴ have all (repeatedly) sounded the alarm about

¹ <https://www.governor.state.nm.us/2019/03/22/governor-signs-landmark-energy-legislation-establishing-new-mexico-as-a-national-leader-in-renewable-transition-efforts/>. 14 other states, and over 110 cities, have committed themselves to 100% clean or renewable energy goals.

² <https://www.ipcc.ch/2020/07/31/energy-climatechallenge/>

reliance on carbon-based energy resources, which necessarily impacts the most cost effective portfolio (“MCEP”) of resources to supply electric load⁵; and

2. For the above stated reasons, more fully described below, the Joint Petition requests that the New Mexico Public Regulation Commission (“PRC” or “Commission”) in accordance with Commission rules and statutory authority and, pursuant to Joint Petitioners’

(“Analysis by the Intergovernmental Panel on Climate Change (IPCC) clearly shows us that global emissions need to be reduced to net-zero within the next few decades to avoid a dangerous increase in global temperatures.”)

³ <https://www.un.org/sustainabledevelopment/climate-change/>

(“2019 was the [second warmest year on record](https://www.un.org/press/en/2021/sc14445.doc.htm) and the end of the warmest decade (2010- 2019) ever recorded.); <https://www.un.org/press/en/2021/sc14445.doc.htm>

(“Climate change is a “crisis multiplier” that has profound implications for international peace and stability, Secretary-General António Guterres told the Security Council today, amid calls for deep partnerships within and beyond the United Nations system to blunt its acute effects on food security, natural resources and migration patterns fueling tensions across countries and regions. ... [N]aturalist David Attenborough, who called climate change ‘the biggest threat to security that modern humans have ever faced’. ...

If we continue on our current path, we will face the collapse of everything that gives us our security,” he said: food production, access to fresh water, habitable ambient temperature and ocean food chains. The poorest — those with the least security — are certain to suffer. “Our duty right now is surely to do all we can to help those in the most immediate danger.”)

⁴ “The 2021 report of the *Lancet* Countdown on health and climate change: code red for a healthy future” October 20, 2021, [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(21\)01787-6/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(21)01787-6/fulltext). The Lancet study is just the latest salvo from health professionals demanding a swift end to burning fossil fuels and other planet-warming activities. From the executive summary: “The 44 indicators of this report expose an unabated rise in the health impacts of climate change and the current health consequences of the delayed and inconsistent response of countries around the globe—providing a clear imperative for accelerated action that puts the health of people and planet above all else.” See also, a [special report](#) released last week, the World Health Organization called climate change “the single biggest health threat facing humanity,” warning that its effects could be more catastrophic and enduring than the coronavirus pandemic.

⁵ 17.7.3.6 NMAC (“The purpose of this rule is to set forth the commission’s requirements for the preparation, filing, review and acceptance of integrated resource plans by public utilities supplying electric service in New Mexico in order to identify the most cost effective portfolio of resources to supply the energy needs of customers. For resources whose costs and service quality are equivalent, the utility should prefer resources that minimize environmental impacts.” See also, **17.7.3.9 B and G NMAC**).

request, oversee a comprehensive study to evaluate, an idea whose time has come, addressing at least the following questions:

- a. Would the pursuit of a publicly controlled utility authority at the state level advance the public interest, in both a “traditional” public utility perspective and an expansive 2021 and beyond regulatory framework that breaks up utility monopolies and supports tribal community and state energy rights, and its interactions with other disruptions that will be occurring simultaneously in the transportation, health, and building sectors during the 2020s and comprehends climate emergency needs?
- b. What are the benefits, costs, and risks associated with such a transition?
- c. What are the high level cost reductions or increases of replacing private investor owned utilities with public power?
- d. What is the revenue potential of exporting excess renewable energy and job creation opportunities?
- e. What is the technical, financial, and legal feasibility of pursuing public power for NM?
- f. What would be the best design for such a transition? The study should compare and contrast the costs and benefits of the status quo versus a publicly-owned power authority and Community Choice Aggregation. See, Section IV, ¶11 below at p. 10.
- g. Can New Mexico become the first state in the nation to be powered by solar, wind, and batteries by or before 2030? And be a net exporter of clean energy? What are the direct and indirect benefits and harms from such a bold vision and implementation? How would being a first mover, from an energy producing state, impact the economy and environment of our state, and how can we incorporate economic and environmental justice principles during the entire process, so that we truly emphasize care and avoid the institutionalized racist harms of the past?

This information provided in a timely manner will allow the Commission to produce an unbiased comprehensive study and serve the Legislative purpose of research and help the Legislature make the ultimate well-informed decision: whether allowing public power retail electric service to the public at just and reasonable rates is feasible. That process must begin with an

understanding of what is possible. The purpose of this study is to expose that possibility for lawmakers, New Mexicans, and beyond.

I. Joint Petitioners

The Joint Petitioners include members of the New Mexico Senate and House of Representatives.

- a. **Senator Elizabeth “Liz” Stefanics**, District 39, County: Bernalillo, Lincoln, San Miguel, Santa Fe, Torrance and Valencia.
- b. **Senator Jeff Steinborn**, District: 36 County: Doña Ana.
- c. **Senator Carrie Hamblen**, District: 38, County: Las Cruces.
- d. **Senator Leo Jaramillo**, District: 5, County: Los Alamos, Rio Arriba, Sandoval & Santa Fe.
- e. **Senator Linda M. Lopez**, District: 11, County: Bernalillo.
- f. **Senator Harold Pope**, District 23, County: Bernalillo.
- g. **Senator Antoinette Sedillo Lopez**, District: 16, County: Bernalillo.
- h. **Senator William Tallman**, District 18, County: Bernalillo.
- i. **Representative Andrea Romero**, District 46, County: Santa Fe.
- j. **Representative Brittney Barreras**, District 12, County: Bernalillo.
- k. **Representative Joanne J. Ferrary**, District 37, County: Doña Ana.
- l. **Representative Derrick J. Lente**, District 65, County: Rio Arriba, Sandoval and San Juan.
- m. **Representative Roger E. Montoya**, District 40, County: Colfax, Mora, Rio Arriba & San Miguel.

- n. **Representative Kristina Ortez**, District 42, County: Taos.
- o. **Representative Angelica Rubio**, District 35, County: Doña Ana.
- p. **Representative Debra M. Sariñana**, District 21, County: Bernalillo.

II. The Commission's Authority

1. Article XI, Section 2 of the New Mexico Constitution, entitled "Responsibilities of Public Regulation Commission," provides:

The public regulation commission shall have responsibility for regulating public utilities as provided by law. The public regulation commission may have responsibility for regulation of other public service companies in such a manner as the legislature shall provide.

2. The Public Utility Act requires that electricity rates be just and reasonable.

NMSA 1978, § 62-8-1.

3. The Commission may proceed with a complaint whenever it deems that the public interest is at issue and may proceed to hold such an inquiry, a hearing, as it may deem necessary or appropriate. NMSA 1978, § 62-10-1; *See also*, Commission Rule §1.2.2.22 NMAC: "The commission may at any time investigate any matter within its jurisdiction."

III. Federal Support

There are a number of federal funding grants that can be tapped to leverage this clean energy revolution opportunity.

IV. Factual Basis for an Inquiry into Public Power

Within the next decade trillions of dollars will be invested in energy infrastructure across the United States. From federal policies to market forces to the inevitable replacement of retiring

fossil fuel plants, the transition to renewable energy sources will necessitate a massive restructuring of not only the power grid and generation sources, but energy markets, ownership and control. With some of the highest solar and wind capacity of any state in the nation and the ability to deliver terawatts of energy to our neighbors and beyond, New Mexico will be presented with numerous opportunities and important decisions as this transition unfolds.

1. We are on the cusp of the fastest, deepest, most profound disruption of the energy sector in over a century. Like most disruptions, this one is being driven by the convergence of several key technologies whose costs and capabilities have been improving on consistent and predictable trajectories – namely, solar photovoltaic power, wind power, and lithium-ion battery energy storage.⁶
2. As we are already witnessing, coal,⁷ nuclear,⁸ and gas⁹ power assets will become stranded during the 2020s, and no new investment in these technologies is rational from this point forward.
3. We want to take advantage of the speed, scale, and implications of the disruptions that we expect to unfold in a rational context because renewables plus battery storage will offer the cheapest electricity option for all, an effective way to address global warming, and create enormous local benefits.
4. We consider the underlying disruption of energy by solar, wind, and batteries to be inevitable and request that the PRC undertake a study to determine the impact

⁶ “*Disruption, Implications, and Choices Rethinking Energy 2020-2030*,” October 2020, Adam Dorr & Tony Seba, <https://www.rethinkx.com/energy>

⁷ Coal: 13-00390-UT, 19-00018-UT, and 19-00195-UT.

⁸ Nuclear: 17-00174-UT, 19-00102-UT, 21-00083-UT, and 21-00215-UT.

⁹ Gas: 15-00205-UT, 16-00105-UT, 19-00349-UT and 19-00195-UT.

of these technologies in combination with the societal benefit of public ownership, with outside consultants paid by private entities.

5. The transition is not being facilitated effectively by our current IOU structure. Despite New Mexico's abundant natural resources, 2nd in the country for solar potential and 11th in the country for wind potential, and the sun Zia on our flag, each of the state's investor-owned-utilities ("IOUs") have relatively small percentages of renewables in their energy portfolios. A major driver of New Mexico's relatively expensive electricity is the state's dependence on coal, nuclear, and gas for electricity generation. It is not only because the fuels are costly to extract and cause harmful consequences for the climate, environment and workers, it is because these thermal units require the constant investment of capital expenditures to keep them operational (ie., large equipment like boilers and silos, pollution controls, etc.). Additionally, an enormous amount of scarce water resources is used throughout the life cycle.
6. Furthermore, under the current energy model - investor-owned-utilities' plant ownership and energy investments require a return on equity that creates a perverse incentive NOT to invest in energy sources with fixed capital costs and no fuel costs.
7. Under the IOU model returns on investments and profits (at least in the case of Public Service Company of New Mexico ("PNM") that return is 9.575% annually) are exported to Wall Street.
8. We must assess the benefits that could be harnessed from a rapid transition facilitated through public and tribal ownership of energy generation and

transmission. According to a significant study by New Mexico's Renewable Energy Transmission Authority (RETA), New Mexico has potential to support wind and solar resource development, with 137,000 MW of wind available and 824,000 MW of solar on State Trust and private lands. Total investment in the development, construction, and operation of new renewables and transmission ranges from \$9.3 billion to \$11.2 billion through 2032. According to the Renewable Energy Transmission and Storage Study, renewable energy generation is estimated to create up to 3,700 development and construction jobs by 2032, with 800 permanent jobs into the future. The Renewable Energy Transmission and Storage Study finds that New Mexico is uniquely positioned to supply renewable energy power to western and midwestern states that have a limited wind/solar energy footprint. In addition to New Mexico, both the State of California and State of Washington will require 100% clean energy supply by 2045. Other western states like Nevada, Oregon, Colorado, Montana, and Arizona have near-term and long-term Renewable Portfolio Standards targets.¹⁰ Public power could help us realize the full potential of our state's renewable energy markets in a way that maximizes revenue and opportunity for the state and local communities.

9. One in seven Americans are served by a public power utility. More than [2,000 communities](#) – in 49 states and 5 U.S. territories – have a public power utility. As a whole, public power utilities have **lower rates** than other types of electric

¹⁰ *New Mexico Renewable Energy Transmission and Storage Study*, June 2020, https://nmreta.com/wp-content/uploads/2020/07/072220-RETA-Executive-Summary-FINAL-APPROVED_online.pdf

utilities. Residential customers of public power utilities pay 11% less than customers of investor-owned utilities – for the average U.S. household, that’s \$176.79 saved each year or about \$15 per month. Outside of major adverse events (e.g., storms), customers of a public power utility are likely to be without power for less time - 62 minutes a year, compared to 150 minutes a year for customers of private utilities.

10. 10% of **electricity generated in the U.S.** is from public power facilities. In 2019, approximately 40% of this electricity was generated from non-carbon emitting sources. Public power utilities generate more than \$60 billion in annual revenue and invest more than \$2 billion annually directly back into the community.

Public power utilities invest this revenue back into their communities through:

- Payments in lieu of taxes
- Providing hometown jobs
- Offering free or reduced cost electric services
- Supporting local causes and charities

Public power utilities employ 96,000 people in hometown jobs.¹¹

11. Additionally, nine states have adopted a unique form that has successfully been implemented known as “Community Choice Aggregation” (“CCA”). CCA is a program by which a municipality or group of municipalities buys bulk power on behalf of residents and businesses, while still receiving distribution services from the existing utility. It’s a concept that was first implemented in Massachusetts in

¹¹ <https://www.publicpower.org/public-power/stats-and-facts>

1997 and has now been adopted by eight other states, including many of Connecticut's neighbors (NJ, NY, RI, MA, and NH). With community input, a CCA develops a plan that can result in residents saving money and increasing the renewable energy content of their electricity. More proactive CCAs can become important players in developing local energy efficiency programs, renewable energy projects, and other distributed energy resources. This study should evaluate the benefits and costs of Community Choice Aggregation,¹² and compare it with a statewide owned grid from an energy producing state with internal local capacity advantages and external export capacity muscle.

12. As part of the public power comparisons it should evaluate the contribution of demand-side management programs, including the importance of energy efficiency, rooftop and community solar and micro-grids. For instance, Hawaii has over 80,000 rooftop PV systems¹³ and distributed solar is the number one source of clean electricity in the state.¹⁴ The degree of solar saturation is

¹² **Community Choice Aggregation (CCA)**, also known as **Community Choice Energy, municipal aggregation, governmental aggregation, electricity aggregation, and community aggregation**, is an alternative to the investor owned utility energy supply system in which local entities in the United States aggregate the buying power of individual customers within a defined jurisdiction in order to secure alternative energy supply contracts. The main goals of CCAs have been to either lower costs for consumers or to allow consumers greater control of their energy mix, mainly by offering "greener" generation portfolios than local utilities. Nine states including New York, Massachusetts, New Jersey, Rhode Island, Virginia, California, Ohio, Colorado, and Illinois have already adopted this legislation. A number of states are currently considering the adoption of public power: New Hampshire, Colorado, Maine, and Connecticut. Our Legislature has considered this as well in 2019 (SB 374) and 2021 (SB 83), with a different name, **Local Choice Energy Act**.

¹³ Iulia Gheorghiu, "Hawaiian Electric Submits 7 Projects Totaling over 1 GWh Storage, 260 MW Solar for Regulatory Review," *Utility Dive*, January 8, 2019.

¹⁴ "Securing the Renewable Future," Hawaii State Energy Office, 2019, <https://energy.hawaii.gov/renewable-energy>.

unprecedented in the United States. Compared to the 2% national average,¹⁵ 19% of the Hawaiian Electric Companies' residential customers have rooftop solar, and on Oahu, solar is on one out of every three single-family homes.¹⁶ All this solar has forced changes to the electricity system to accommodate customer choice and leverage the full spectrum of services that customer-sited technologies can provide to the grid. Successful solar integration has occurred! How would New Mexico encourage the kind of decentralized generation that mimics Hawaii's success? What would it take to do this? Incentives? Federal and state subsidies? How would decentralized generation (rooftop and community solar) interact with statewide public power? How would microgrids interact with statewide public power?

Petitioners request that the PRC take a systems approach to analyze the complex interplay between individuals, businesses, investors, and policymakers in assessing existing solar photovoltaic, wind power, and lithium-ion battery technologies that have well-established cost curves, and on existing business models and the impact that this economic disruption may have as it ripples across the rest of society. The Connecticut Public Utility Regulatory Authority recently performed a similar study of Community Choice Aggregation, a copy of which is attached as Exhibit A. Joint Petitioners request that the PRC expand the endeavor and evaluate

¹⁵ *Working Together for a Sustainable Future*, HEI annual report 2018, <http://www.hei.com/interactive/newlookandfeel/1031123/annualreport2018.pdf>.

¹⁶ "2018 saw 5% jump in residential rooftop solar installations," **Hawaiian Electric, January 16, 2019**, <https://www.hawaiianelectric.com/2018-saw-5-jump-in-residential-rooftop-solar-installations>. See, also, "Hochul announces new framework to achieve at least 10 gigawatts of distributed solar by 2030," <https://www.wnypapers.com/news/article/current/2021/12/20/149097/hochul-announces-new-framework-to-achieve-at-least-10-gigawatts-of-distributed-solar-by-2030>

both the Community Choice Aggregation and publicly owned grid model for New Mexico. Our aim is to inspire a conversation in New Mexico about the threats and opportunities of this technology-driven disruption and to focus attention on choices that can help lead to a more equitable, healthy, resilient, and stable society.

V. Public Interest

1. Indeed, it is not only the Joint Petitioners that believe that there are more cost effective and more environmentally friendly energy resources than coal, gas, and nuclear, the overwhelming majority of New Mexican voters believe that we should procure as much of our electricity from wind and solar as possible. 1080 voters in New Mexico were polled from January 15-17, 2019, by the polling firm, Change Research. The following highlights key findings from the survey:

- New Mexicans want to maximize renewable energy production and use. 81% of the people polled agree with the statement that “we should produce electricity from wind and solar as much as possible.”

- A significant majority of voters believe that New Mexico should produce electricity using 100% renewable energy sources, such as solar and wind, in the future. Nearly three-fourths (72%) agree with this while just 25% disagree.

- Voters believe that renewable energy is a high-tech industry that generates high paying jobs and that it is less expensive to produce electricity from renewable energy such as wind and solar than from fossil fuels such as coal, oil, and natural gas.

VI. Questions that a study might address:

- a. What are the costs and benefits of a statewide public power authorization with local municipality /tribal services and governance compared with CCA (or “Local Choice Energy”) versus the status quo? What enabling legislation would be required to accomplish a statewide public power authority or Local Choice Energy?
- b. Can public power generally procure electricity for prices lower than or equal to incumbent utilities?
- c. Can public power reduce energy use and shape the demand profile in their territories?
- d. Can public power promote energy efficiency and attract funding to do so?
- e. Can public power help deploy and accelerate clean energy development?
- f. Will public power facilitate the adoption of distributed energy resources, including rooftop solar, community solar, battery storage, and demand response?
- g. Can public power help accelerate the modernization of a more decentralized, resilient, two-way grid?
- h. Can public power help accelerate the decarbonization of New Mexico’s transportation sector through electrification via clean energy?
- i. Will public power benefit low and moderate income communities?
- j. Will public power benefit other important local benefits, like: safety, security, resiliency, and jobs?

k. Potential Problems

1. What are the downsides? Is there evidence that public power adoption will increase/decrease market competition? Could public power adoption increase/decrease the rural/city divide for electricity and other needs? If so, what would be the magnitude of these consequences and how could they be minimized?

1. Regulatory Issues

1. How much regulatory review should there be of public power? After public power is created, how much regulatory review should there be on an ongoing basis?
2. Explain the interaction between the state created public power entity and local municipal and tribal entities regarding distribution, transmission, and other services including metering and billing, etc.?
3. What additional minimum requirements should apply to independent power producers and power marketers who want to supply energy to state, local municipal and tribal entities?
4. Explain necessary requirements including reliability criteria, planning and operating reserve margins (and what percentage), resource adequacy, load forecast, environmental requirements, energy efficiency, etc.
5. Finally, the study should answer this question: Would the potential benefits of public power outweigh the potential challenges? And what caution would the reviewers advise, even if they would support public power?

VII. Request for Oral Presentation

Senator Liz Stefanics and Representative Andrea Romero, or our representative, request

a brief 10 minutes before this Honorable Commission, on January 12, 2022, to present its case for this Joint Petition and answer any questions that the Commissioners may have related to the execution of a public power study for New Mexico.

VIII. Conclusion

For the reasons set forth herein, the relief requested in this Joint Petition for Investigation is necessary to protect Joint Petitioners' interests as IOU customers and New Mexicans and for the Commission to carry out its statutory duties under the Commission's duty to protect the interest. Joint Petitioners are not asking the Commission to include the rural cooperatives in the study.

The factual allegations in this Joint Petition for Investigation are true and correct to the best of the belief of Joint Petitioners as indicated by the signature of Senator Liz Stefanics and Representative Andrea Romero below.

WHEREFORE, on behalf of the Joint Petitioners, we humbly request this regulatory agency open a docket to investigate, pursue discovery, and continue regulation to evaluate and determine if public power ownership for New Mexico would result in a net public benefit, the most cost effective resource among feasible alternatives, and is in the public interest. Time is of the essence because there is an opportunity for visionary clean energy leadership and action. New Mexico can create an economic engine in perpetuity from in-state 100% solar, wind and battery adoption and be a renewable energy exporter, and offer insights, perspectives, and learnings that can help others around the world follow from our best practices in our own clean energy transition.

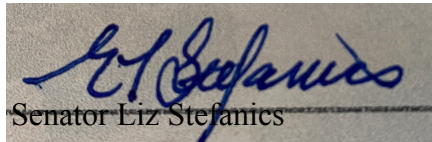
Public protection is at the heart of the Joint Petitioners request for investigation.

In accordance with Commission rules and applicable law, Petitioners respectfully request that the Commission:

1. find that the Commission has jurisdiction over the matters addressed herein and that probable cause exists that the Commission pursue discovery; and
2. initiate a docket to address this Joint Petition;
3. allow an outside consultant (s) or consulting firm(s) to conduct an inquiry consistent with the Petition herein and to be funded by private entities; and
4. determine for itself whether the cost/benefit analyses, including an in-depth narrative explanation, and alternatives assessment is worthy of this Commission's endorsement and is consistent with the public interest and the statutory requirement that the provision of electricity be delivered at just and reasonable rates.

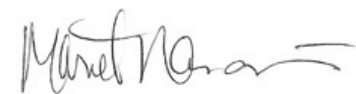
Respectfully submitted this, December, 21, 2021.

On Behalf of the Joint Petitioners



Senator Liz Stefanics

_____/s/_____
Representative Andrea Romero



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COSTS AS WELL AS THE TECHNICAL FEASIBILITY
OF STATE-LEVEL PUBLIC UTILITY MODELS FOR
THE STATE OF NEW MEXICO**

Case No.

On this date I caused to be sent to the individuals listed below, via e-mail only, a true and correct copy of

Joint Petition Requesting to Initiate A Study on Public Power Models

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Respectfully submitted this 21st day of December,



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