

From: [Adrienne Ross \(ahlight@gmail.com\)](mailto:ahlight@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:15:42 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

The SPS application does not result in additional economic development in New Mexico, but rather projects that SPS planned to build anyway. Certification for the 14 proposed SPS projects, 11 of which would be located in Texas or Oklahoma, would be outside the scope of what SB170 was intended to support and would set a dangerous precedent for utilities to sidestep the Public Regulation Commission's full and appropriate review of utility applications.

The significantly shorter time allowed for PRC review would also mean intervenors and the public would have little to no opportunity to analyze and participate in resource cases, and economic-development certification would put a thumb on the scale for cost-recovery consideration at the commission. Certification nearly guarantees SPS would be allowed cost recovery from New Mexico customers, whose rates would almost surely increase because of these projects. The PRC needs adequate time to review such a large portfolio of resources of varying technologies and should not have its authority or review time curtailed.

At least one of the projects under consideration would likely violate the New Mexico Energy Transition Act unless SPS is granted a waiver. The EDD shouldn't issue what amounts to a pre-approval at the PRC for a utility to skirt another New Mexico law.

The other regulated electric utilities reported that they plan to request this certification for electrical facilities to serve, for example, a business park or a master-planned community. But the SPS application is not for any one project. It is asking the Economic Development Department to determine that the resources SPS was planning to build anyway are all special economic-development projects for New Mexico -- even the ones in Texas or Oklahoma, because they might eventually supply power to New Mexico businesses.

Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Adrienne Ross
19 Cerro Blanco Rd

Lamy, NM 87540
ahlight@gmail.com
(505) 466-2600

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Alasdair Lindsay \(Alasdair.d.lindsay@gmail.com\) Sent You a Personal Message](mailto:Alasdair.Lindsay@grsdelivery.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 11:58:00 AM

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Dear New Mexico Economic Development Department,

Why do New Mexicans feel like they need to suck up to all the boondoggles going on in Texas? Get a spine Economic Development Department.

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Sincerely,

Alasdair Lindsay
48 Avenida Frijoles
Santa Fe, NM 87507
alsdair.d.lindsay@gmail.com
(713) 882-2411

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Alex Stavrides \(stavride@hotmail.com\) Sent You a Personal Message](mailto:stavride@hotmail.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 3:18:31 AM

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Dear New Mexico Economic Development Department,

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Sincerely,

Alex Stavrides
11600 Academy Rd NE Apt 3822

Albuquerque, NM 87111
stavride@hotmail.com
(302) 983-5144

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Alexa J Lane \(horsezens1@gmail.com\)](mailto:horsezens1@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 9:40:57 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

Alexa J Lane
4608 Lobelia Rd NW

Albuquerque, NM 87120
horsezens1@gmail.com
(505) 205-9843

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Ann Ellen Tuomey \(jimae@taosnet.com\)](mailto:jimae@taosnet.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:46:01 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Ann Ellen Tuomey
17 Buena Vista Rd

El Prado, NM 87529
jimae@taosnet.com
(575) 776-5866

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Anne Fitzpatrick \(anne87120@hotmail.com\)](mailto:anne87120@hotmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:55:19 PM

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Dear New Mexico Economic Development Department,

SPS is violating the intent of NM legislation. Please do not let them get around the purpose of NM regulations.

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Sincerely,

Anne Fitzpatrick
35 Tennis Ct NW
Albuquerque, NM 87120
anne87120@hotmail.com
(505) 898-7133

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Anthony Baldo \(apbaldo2@gmail.com\)](mailto:apbaldo2@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:42:53 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

Anthony Baldo
1115 Calle Quieta

Santa Fe, NM 87507
apbaldo2@gmail.com
(949) 315-1509

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Stacy Nelson \(seventhtask@yahoo.com\)](mailto:seventhtask@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 6:56:10 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

Stacy Nelson
74 Camino Don Fidel

Santa Fe, NM 87507
seventhtask@yahoo.com
(505) 660-9653

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Arnold Lane Leckman \(alleckman@gmail.com\)](mailto:alleckman@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:15:53 PM

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Sincerely,

Arnold Lane Leckman
521 Solano Dr NE

Albuquerque, NM 87108
alleckman@gmail.com
(505) 280-9644

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [B Thomas Diener \(texasbtdiener@gmail.com\)](mailto:texasbtdiener@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 12:04:47 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

B Thomas Diener
12208 Kinley Pl NE

Albuquerque, NM 87112
texasbtdiener@gmail.com
(505) 296-1661

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [becky renfro \(brenfro32@gmail.com\)](mailto:brenfro32@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:50:55 PM

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Dear New Mexico Economic Development Department,

New Mexico Energy projects should stay in New Mexico and should follow the New Mexico Energy Transition Act Guidelines. Also the PRC and the affected New Mexico Taxpayers/Public should have time to review and comment on these projects. Thank you for your consideration.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

becky renfro
1232 Espejo St NE
Albuquerque, NM 87112
brenfro32@gmail.com
(505) 238-7923

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Bill Gray \(bill42845@gmail.com\)](mailto:bill42845@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 11:11:34 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Bill Gray
6668 Vista Hermosa

Las Cruces, NM 88007
bill42845@gmail.com
(970) 309-2160

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Bo Bergstrom \(bo.cinesthetic.30.yx@gmail.com\)](mailto:bo.cinesthetic.30.yx@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:03:36 PM

You don't often get email from bo.cinesthetic.30.yx@grsdelivery.com. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

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Sincerely,

Bo Bergstrom
30 Village Rd

Silver City, NM 88061
bo.cinesthetic.30.yx@gmail.com
(575) 538-9086

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Brandon Smith \(bsmith82@yahoo.com\)](mailto:bsmith82@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:11:18 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Brandon Smith
505 Quartz St

Los Alamos, NM 87544
bsmith82@yahoo.com
(570) 765-0775

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Bruce Donnell \(b_donnell@msn.com\) Sent You a Personal Message](#)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 9:26:11 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Bruce Donnell
11 Camino Crosby

Santa Fe, NM 87506
b_donnell@msn.com
(505) 983-7511

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Bryan Romkey \(yungbobb@gmail.com\)](mailto:yungbobb@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:48:26 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Bryan Romkey
2146 Rivers Edge Dr NE

Rio Rancho, NM 87144
yungbobb@gmail.com
(505) 273-1297

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [C.L. Steven \(yankiecarmon@gmail.com\)](mailto:C.L.Steven(yankiecarmon@gmail.com)) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 2:43:55 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

C L Steven
600 N Bullard St

Silver City, NM 88061
yankiecarmon@gmail.com
(858) 361-9695

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Candace Boulay \(cmboulay2@gmail.com\) Sent You a Personal Message](mailto:cmboulay2@gmail.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 9:23:22 PM

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Dear New Mexico Economic Development Department,

Our household works hard to support a better future for generations beyond ours. We are completely against the SPS and a blatant attempt to flout procedures and rules meant to protect New Mexico. How dare the SPS claim NM will benefit from projects to be done in Texas and Oklahoma, making NM pay for those dirty gas facilities? Stop, Stop, Stop ripping off New Mexico on behalf of wealthy outsiders who don't give a damn about anything but their own greedy, short-sighted gains. NM laws are meant to protect New Mexico first. Time to do that is now.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Candace Boulay
400 W Las Cruces Ave
Las Cruces, NM 88005
cmboulay2@gmail.com
(505) 577-5734

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: CATHERINE Ivie (bobcatt02@yahoo.com) Sent You a Personal Message
To: constituent.services, EDD
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:52:41 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

CATHERINE Ivie
5001 Rockcress Dr NW

Albuquerque, NM 87120
bobcatt02@yahoo.com
(502) 727-3066

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Catherine Lacey \(catherinelcy@yahoo.com\) Sent You a Personal Message](mailto:catherinelcy@yahoo.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 3:47:39 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Catherine Lacey
802 Spruce St

Truth Or Consequences, NM 87901
catherinelcy@yahoo.com
(575) 894-6689

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.



Coalition For Clean Affordable Energy

August 22, 2025

Rob Black
Secretary, New Mexico Economic Development Department
P.O. Box 20003
Santa Fe, New Mexico 87504-5003

Re: Southwestern Public Service Company Request for Economic Development Certification

Dear Secretary Black,

We are writing on behalf of Coalition for Clean Affordable Energy (CCAIE) to express our opposition to Southwestern Public Service Company's Request for an Economic Development Certification, dated June 20, 2025. Southwestern requests certification for fourteen electricity generation and storage resources that it plans to construct, mostly in the state of Texas. We appreciate the opportunity to submit our comments and recommendations on Southwestern's request.

I. Background

On April 7, 2025, the Governor signed into law Senate Bill 170, which amended the New Mexico Finance Authority Act¹ and the New Mexico Public Utility Act.² Among other things, the bill creates an expedited process for the Public Regulation Commission to review electric utility development, construction, and maintenance of "economic development projects." As amended by Senate Bill 170, the Public Utility Act defines "economic development project" as:

the construction or modification of new or existing electric generation facilities, energy storage facilities, transmission and distribution facilities, zero-carbon resources as defined in Subsection K of Section 62-16-3 NMSA 1978, alternative fuel facilities, energy efficiency programs, renewable energy and fuel cell

¹ NMSA 1978, §§ 6-21-1 to 6-21-31 (2025).

² NMSA 1978, ch. 62, arts. 1 to 6, 8 to 13.

facilities, recycled energy or other technologies necessary to serve reasonably anticipated new load and that have been certified by the economic development department pursuant to Subsection F of this section.³

To receive expedited review of an “economic development project” from the Public Regulation Commission, an electric utility must first request a certification from the New Mexico Economic Development Department. Upon receiving a request, the Economic Development Department must “certify, using industry standard guidelines for site selection, whether the economic development project will support reasonably anticipated economic development within the state” of New Mexico.⁴ Prior to certification, the Department must “provide an opportunity for public comment regarding whether the proposed economic development project will support reasonably anticipated economic development within the state.”⁵ The Department must “issue a certification letter within sixty days of a request from a public utility.”⁶

If the Department issues a certification that the proposed “economic development project” will support reasonably anticipated economic development within New Mexico, the utility includes the certification letter in its application to the Public Regulation Commission for approval of the project.⁷ The Commission must then review the application on an expedited basis and “issue a final order approving, modifying or denying the application within six months of the application filing date.”⁸ Upon a showing of good cause, the six-month deadline can be extended by three months.⁹ The normal review time (i.e., if there is no certification) under the statute is significantly longer; the Commission must issue a final order within nine months, which can be extended by six months for good cause.¹⁰ If the Commission does not act within the prescribed time, the application is automatically approved.¹¹

Referencing the provisions of the amended Public Utility Act, on June 20, 2025, Southwestern filed with the Department a request for certification of fourteen projects as “economic development projects” that “will support reasonably anticipated economic development within” New Mexico.¹² Southwestern’s fourteen proposed “economic development projects” are all electricity generation or battery storage – sometimes called “BESS” for battery energy storage system – projects. The list of projects includes two solar projects of 200 to 252

³ NMSA 1978, § 62-6-26(G)(1) (2025).

⁴ NMSA 1978, § 62-6-26(F) (2025).

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

⁸ NMSA 1978, § 62-6-26(E) (2025); NMSA 1978, § 62-9-1(D) (2025).

⁹ *Id.*

¹⁰ NMSA 1978, § 62-9-1(C) (2025).

¹¹ NMSA 1978, § 62-9-1(D) (2025).

¹² Southwestern Public Service Co., Request for Economic Development Certification (June 20, 2025) (hereinafter “Southwestern Request”).

megawatts (MW) each and three wind projects of 152 to 300 MW each. It includes eight battery storage projects of 50 to 150 MW each. And it includes one natural gas-fired turbine power plant of 1,003 MW. Only three of the fourteen projects would be constructed in New Mexico – one of the solar projects and two of the battery storage projects. Two of the battery storage projects would be in Oklahoma, and the remainder of the projects would be in Texas.¹³

II. Interest of Coalition for Clean Affordable Energy

CCAIE has a substantial interest in the subject matter of Southwestern’s request. If the request is granted, Southwestern will be entitled to expedited review of the proposed electricity generation and storage resources before the Public Regulation Commission.

CCAIE is a coalition of ten non-profit environmental and public interest groups¹⁴ active in New Mexico and the broader Rocky Mountain and Southwest region of the United States formed to promote clean and affordable energy policies in New Mexico. Among CCAIE’s goals are to promote clean energy through energy efficiency, solar and wind energy, and battery storage; to promote the complete transition from fossil fuel-generated energy – including energy produced from coal, oil, and natural gas – to cleaner sources of energy; to reduce the emission of greenhouse gases from energy production and consumption; to reduce the emission of other harmful pollutants from energy production and consumption; to promote the equitable distribution of the costs of energy production; to oppose energy policies and practices that result in adverse effects on low-income individuals and disadvantaged communities; and to promote the electrification of transportation.¹⁵

To further these goals, CCAIE regularly participates as an intervenor in public utility proceedings before the New Mexico Public Regulation Commission. Professional staff of CCAIE member organization frequently present written and oral testimony at Commission hearings.

III. Comments

CCAIE opposes certification of any of these projects as “economic development projects” that “will support reasonably anticipated economic development within” New Mexico. We oppose certification on both legal and policy grounds. CCAIE recommends that the Economic Development Department deny Southwestern’s request for certification for the reasons set forth below.

Southwestern has not demonstrated that these projects meet the threshold statutory requirement that they “will support reasonably anticipated economic development within the

¹³ *Id.* at 12, Table 2.

¹⁴ The CCAIE member organizations are 350NM.org, the Center for Advancing Sustainable Architecture, Environment New Mexico, Natural Resources Defense Council, the Partnership for Responsible Business, Southwest Energy Efficiency Project, Southwest Research and Information Center, Western Environmental Law Center, Western Resource Advocates, and The Union of Concerned Scientists.

¹⁵ Coalition for Clean Affordable Energy, Description, Mission and Goals 1-2 (Feb. 2023).

state” of New Mexico. Its projections of electricity demand within its service territory are unrealistic and fraught with uncertainty.

Southwestern projects substantial near-term load growth on its system, resulting in a need for additional generating capacity. Southwestern forecasts its summer accredited capacity need to grow immensely from 656 MW in 2027 to 2,925 MW in 2030 and winter capacity need to grow from 469 MW in 2027 to 3,338 MW in 2030.¹⁶

These forecasts, however, are inconsistent with statements in Southwestern’s 2023 Integrated Resource Plan (IRP) submitted to the Public Regulation Commission. The IRP states that prior forecasts have shown declining electricity load, specifically, a “-2.8% historical annual average load decline and -1.0% historical annual average energy decline over the 10 years ending 2022.”¹⁷ Moreover, Southwestern’s conservative “Financial Forecast” “projects its electric firm obligation load (firm retail and firm wholesale requirements customers) to increase at a compound annual growth rate of 1.0% or an average of 67 MW per year through the Planning Period [i.e., 2024-2043].”¹⁸ In its high growth “Electrification Forecast,” Southwestern projects “firm load would grow at an average rate of 2.1% through the Planning Period, with annual growth of 5.1% from 2024 to 2036 and, due to declining oil and gas activity in the outer years, a -2.7% rate from 2036 to 2043.”¹⁹

Many factors, such as fluctuations in the price of oil, make Southwestern’s forecasts highly uncertain. Southwestern’s forecasts are likely overstated and unreliable. They do not support economic development that can be described as “reasonably anticipated.”

Aside from not meeting this legal threshold, a variety of policy considerations weigh heavily against certification of Southwestern’s proposed projects.

First, the proposed construction of a 1,003 MW gas-fired power plant in Gaines County, Texas, would likely place it on a collision course with New Mexico’s renewable energy standards, making the plant a remarkably poor investment. The proposed commercial operation date for the plant is December 1, 2028.²⁰ Under the New Mexico Renewable Energy Act, a public electric utility serving customers in New Mexico must meet a renewable portfolio standard. The standard culminates on January 1, 2045, when “zero carbon resources shall supply one hundred percent of all retail sales of electricity in New Mexico.”²¹ Thus, to comply with New Mexico law, the proposed Gaines County gas-fired plant would either need to shut down by January 1, 2045 – giving it a useful life of only sixteen years – or divert all its electricity production to Texas customers before that date. Neither option seems to be economically prudent.

¹⁶ Southwestern Request at 7, Table 1.

¹⁷ Southwestern Public Service Co., *2023 Integrated Resource Plan* 63 (Oct. 13, 2023).

¹⁸ *Id.* at 64.

¹⁹ *Id.* at 65.

²⁰ Southwestern Request at 12, Table 2.

²¹ NMSA 1978, § 62-16-4(A)(6) (2019).

Second, construction of the proposed Gaines County gas-fired plant would be contrary to the goals of Governor Lujan Grisham’s Executive Order on Climate Change.²² The Executive Order expressly finds that carbon dioxide and other greenhouse gases contribute to climate change, and that “carbon dioxide is emitted through the combustion of fossil fuels for electricity generation.”²³ The order states that “New Mexico’s objective is to achieve a statewide reduction in greenhouse gas emissions of at least 45% by 2030 as compared to 2005 levels.”²⁴ Although the Gaines County plant would be constructed in Texas, it would apparently be constructed to serve New Mexico business customers. Moreover, climate change is a global problem. Emissions of carbon dioxide will adversely affect New Mexicans’ health and welfare regardless whether the emissions originate in New Mexico or Texas.

Third, Southwestern’s proposed projects will largely be used to supply electricity to oil and gas production in the Permian Basin, which is in its service territory. As stated in its request, Southwestern’s “analysis considers different sources of economic benefits, including direct investment and capital spending associated with increased oil and gas expansion and electrification.”²⁵ Although the projects will allow electrification of oil and gas production, Southwestern’s analysis also anticipates that additional electricity capacity “can enable new investment and expand production.”²⁶ Further, according to the analysis, “[p]roviding adequate electricity capacity to support oil and gas production can reduce production costs for these operations,” and “[l]ower costs, in turn, create a strong incentive for expanding production.”²⁷ The combustion of fossil fuels derived from oil and gas is a primary source of carbon dioxide emissions.²⁸ Oil and gas production is also the largest industrial source of methane emissions²⁹ – natural gas is approximately eighty percent methane. Both carbon dioxide and methane are recognized greenhouse gases that are causing global climate change.³⁰ Among other things, climate change “presents growing challenges for human health and safety, quality of life, and the rate of economic growth.”³¹ Encouraging the expansion of oil and gas production would therefore seem to be bad public policy.

²² E.O. 2019-003, *Executive Order on Addressing Climate Change and Energy Waste Prevention* 1 (Jan. 29, 2019) (hereinafter “Executive Order on Climate Change”).

²³ *Id.* at 1.

²⁴ *Id.* at 3.

²⁵ Southwestern Request at 13.

²⁶ Energy Economic & Environmental Consultants LLC, *Preliminary Report of the Economic and Fiscal Impacts from Southwestern Public Service Company’s Proposed Capacity Expansion in New Mexico* 10 (June 20, 2025) [Exhibit A to Southwestern’s Request] (hereinafter “E3C Preliminary Report”).

²⁷ *Id.* at 11-12.

²⁸ Executive Order on Climate Change at 1.

²⁹ *Id.* at 2.

³⁰ *Id.* at 1.

³¹ *Id.*

Fourth, most of these proposed projects will be constructed outside New Mexico. Of the fourteen projects that Southwestern proposes, only three – an unnamed 200 MW solar project in Roosevelt County, and two 50 MW battery storage facilities in Chaves County – will be constructed in New Mexico.³² With a total of 300 MW, the three proposed New Mexico projects represent only about 10.5% of the total 2,869.7 MW capacity of the fourteen projects. While it is true that electricity generation and storage constructed in other states can provide electric power to New Mexico customers, and that some workers may cross state lines for jobs,³³ construction, operation, and maintenance of “economic development projects” is a significant component of the economic benefit they provide. Additionally, projects constructed outside New Mexico will not pay any property taxes to New Mexico counties or municipalities. Electricity generation and storage projects constructed in Texas or Oklahoma should not be certified as “economic development projects” for New Mexico.

Further, the Department needs to place some limits or parameters on the sorts of projects that are eligible for certification. Although the statute is written in broad terms, as Southwestern points out,³⁴ if the statute is interpreted to its fullest breadth, virtually any electricity project that supplies a few kilowatts of electricity to New Mexico commercial or industrial customers would qualify for certification. Such an expansive interpretation of the statute would not be reasonable or defensible; it is certainly not what the Legislature intended. It would, moreover, place a heavy burden on the Public Regulation Commission, which would be legally obligated to process the applications for all such projects on an expedited basis. There needs to be some limits. Limits or parameters would guide the Department in reviewing future requests. They would also provide guidance to electric utilities that plan to submit a request to the Department. They would also enhance transparency in the Department’s decision-making process, for affected electric utilities and for interested members of the public.

Such limits or parameters could be established through Department policy or guidance, posted on the Department’s website. A preferable approach would be to adopt them through a rulemaking proceeding, with public notice and full public participation.

Based in part on our review of Southwestern’s request, CCAE proposes several rudimentary limits or parameters that should guide the Department in reviewing this request and other future requests. They are not intended to be exclusive.

1. An electricity generation or battery storage project must be constructed in New Mexico to qualify for certification. A transmission facility must at least partially cross New Mexico land to qualify for certification.

2. An electricity generation project that is powered by burning fossil fuels – including coal, oil, natural gas, or hydrogen produced from fossil fuels – should not qualify for certification.

³² Southwestern Request at 12, Table 2.

³³ See E3C Preliminary Report at 9.

³⁴ Southwestern Request at 6.

3. An electricity generation or battery storage project that primarily serves the fossil fuel industry – particularly oil or gas production, transportation (such as gas pipelines), or refining – should not qualify for certification.

4. An electricity generation or battery storage project should serve or primarily serve one or more specific projects or developments within New Mexico. Such projects could include an industrial park, an energy-efficient shopping center, low-cost housing, drinking water facilities, sewerage or waste disposal facilities, a municipal park, a public recreational facility, public transportation systems (preferably electric), electric vehicle charging, school buildings or other educational facilities, or other specific projects that promote economic development.

5. An electricity generation or battery storage project should have a minimum capacity, perhaps 100 MW, to qualify for certification.

III. Recommendations

CCAIE recommends that the Economic Development Department deny Southwestern's request for certification of these fourteen proposed projects as "economic development projects" that "will support reasonably anticipated economic development within the state" of New Mexico.

CCAIE also recommends that the Department establish some limits or parameters on the projects that qualify for certification to guide the review of future requests. The limits or parameters would best be adopted through a public rulemaking proceeding.

Thank you for your consideration of our comments and recommendations. If you have any questions on these comments or recommendations, please call or email either of us, Mr. de Saillan at (505) 819-9058 or desaillan.ccae@gmail.com, and Ms. Lynch at (505) 977-3025 or Lynch.Cara.NM@gmail.com.

Sincerely,



Charles de Saillan

Cara R. Lynch

Coalition for Clean Affordable Energy

From: [Charles Fox \(cfox@aviandesign.net\)](mailto:cfox@aviandesign.net) Sent You a Personal Message
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Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

The SPS application does not result in additional economic development in New Mexico, but rather projects that SPS planned to build anyway. Certification for the 14 proposed SPS projects, 11 of which would be located in Texas or Oklahoma, would be outside the scope of what SB170 was intended to support and would set a dangerous precedent for utilities to sidestep the Public Regulation Commission's full and appropriate review of utility applications.

The significantly shorter time allowed for PRC review would also mean intervenors and the public would have little to no opportunity to analyze and participate in resource cases, and economic-development certification would put a thumb on the scale for cost-recovery consideration at the commission. Certification nearly guarantees SPS would be allowed cost recovery from New Mexico customers, whose rates would almost surely increase because of these projects. The PRC needs adequate time to review such a large portfolio of resources of varying technologies and should not have its authority or review time curtailed.

At least one of the projects under consideration would likely violate the New Mexico Energy Transition Act unless SPS is granted a waiver. The EDD shouldn't issue what amounts to a pre-approval at the PRC for a utility to skirt another New Mexico law.

The other regulated electric utilities reported that they plan to request this certification for electrical facilities to serve, for example, a business park or a master-planned community. But the SPS application is not for any one project. It is asking the Economic Development Department to determine that the resources SPS was planning to build anyway are all special economic-development projects for New Mexico -- even the ones in Texas or Oklahoma, because they might eventually supply power to New Mexico businesses.

Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Charles Fox
119 W Berger St Apt 3

Santa Fe, NM 87505
cfox@aviandesign.net
(505) 577-0548

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Sincerely,

Chemen Ochoa
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Santa Fe, NM 87508
chemenochoa@msn.com
(505) 466-2311

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Dear New Mexico Economic Development Department,

There is enough skirting of laws and public regulations happening with the blessings of the criminal organization pretending to be a federal administration. Laws and regulations are in place to protect all of us and our lands. Ignoring or glossing over them harms us all.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Cheryl Byrd
3201 Valencia Dr NE
Albuquerque, NM 87110
seabird49@gmail.com
(505) 878-0929

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Dear New Mexico Economic Development Department,

We need to carefully preserve the resources we have in New Mexico for New Mexicans. We do not need to subsidize Texas and Oklahoma customers

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Cheryl Foote
1824 Rita Dr NE
Albuquerque, NM 87106
crfoote@aol.com
(505) 400-0265

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Sincerely,

Chip Leavitt
4510 Olympus St

Silver City, NM 88061
vilcanota@me.com
(575) 388-5292

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Chris Calvert
230 Cibola Dr

Santa Fe, NM 87501
chriscalvert82@gmail.com
(505) 555-1212

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Cithlali Guzman \(cithlali@gmail.com\)](mailto:CithlaliGuzman@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:08:53 PM

You don't often get email from cithlali@gmail.com. [Learn why this is important](#)

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

Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Cithlali Guzman
7908 Rock Springs Rd SW

Albuquerque, NM 87121
cithlilig@gmail.com
(505) 615-1520

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Claudette Selph \(claudette@selphandassociates.com\)](mailto:Claudette.Selph@selphandassociates.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:10:30 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

Claudette Selph
1835 Truchas Peak Trl NE

Rio Rancho, NM 87144
claudette@selphandassociates.com
(555) 555-5555

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.



**CITY MANAGER'S
OFFICE**

Justin A. Howalt, P.E.
City Manager

Claire H. Burroughes
Asst. City Manager

Jared Morris
City Attorney

August 21st, 2025

**Re: Public Comment – Request for Economic Development Certification – Southwestern
Public Service Company**

To Whom It May Concern;

I understand that Southwestern Public Service Company is seeking certification for 14 wind, solar, thermal, and battery energy storage system project as economic development projects under New Mexico Senate Bill 170. I support their efforts in this regard.

Not only will the above proposed additions support the power supply to the areas of New Mexico SPS supports, they will also act as an economic development driver, providing for future growth on the eastern side of the state including areas like Clovis. As stated in the proposed capacity expansion, the City of Clovis owns and is seeking to bring industry to its 240-acre industrial park, and is always seeking to expand and diversify industry in our area. Securing an adequate regional power supply will ensure the ability for municipalities across the region supported by Xcel Energy and its subsidiary SPS to continue to grow industrial opportunities and the economy of New Mexico as a whole.

Should you have any questions, please do not hesitate to contact me at jhowalt@cityofclovis.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin A. Howalt", is written over a horizontal line.

Justin A. Howalt
City Manager

From: [Connie Adler \(cadler33@mac.com\) Sent You a Personal Message](#)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 9:59:20 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Connie Adler
2701 Rincon Del Rio Ct NW

Albuquerque, NM 87107
cadler33@mac.com
(505) 350-9808

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.



ConocoPhillips Company
600 W. Illinois Avenue
Midland, Texas 79701

August 21, 2025

Secretary Rob Black
Cabinet Secretary
NM Economic Development Department
110 S. St. Francis Drive
Santa Fe, NM 87505-4147

Re: Comment in Support of SPS' Request for Economic Development Certification

ConocoPhillips is writing in support of Southwestern Public Service Company's (SPS) request for Economic Development Certification from the New Mexico Economic Development Department (EDD), pursuant to Section 62-2-26(F) NMSA, as contemplated in Senate Bill 170.

ConocoPhillips is an independent exploration and production oil and gas company that has operated, via heritage companies, in New Mexico for almost 100 years. ConocoPhillips is one of the largest oil and gas producers in the state, all from wells in SPS's service territory in New Mexico. It is estimated that ConocoPhillips contributes around \$1 billion to New Mexico's economy, including more than 7,000 direct and indirect jobs and over \$985 million paid to the state in taxes and royalties. A further \$254 million is spent each year supporting local businesses, included local contracting companies, minority-owned small businesses, and local retail services and expenses associated with travel to and around southeastern New Mexico. ConocoPhillips is committed to responsibly accessing, developing and producing oil and natural gas to help meet New Mexico's energy needs, today and throughout the energy transition.

As described in SPS's request, the generation projects proposed will support new electric load requests resulting in significant economic development in southeast New Mexico. The projects included in SPS's request will not only result in direct investment in the proposed generation facilities, the increased capacity brought onto the grid by these projects will also allow for broad economic development across many sectors in Southeast New Mexico, including but not limited to new investment from the oil and gas industry.

A 2023 paper published by S&P Global Upstream Consulting (the "S&P Global study") projected the electricity demand in the Permian Basin to increase fourfold from the 4.2 GW available in 2022 to 17.2 GW by 2036 (SPP-specific increase: 5.3 GW). This tremendous load growth reflects a huge departure from the load growth previously forecasted for this region. This load growth is the result of increased oil and gas electrification needs for existing and new production sites, and for electrification of equipment in furtherance of emissions reduction goals. This load

growth is neither unrealistic nor speculative and electrification is a crucial part of reducing emissions in the Permian.

Figure 1: Current (2022) load demand distribution

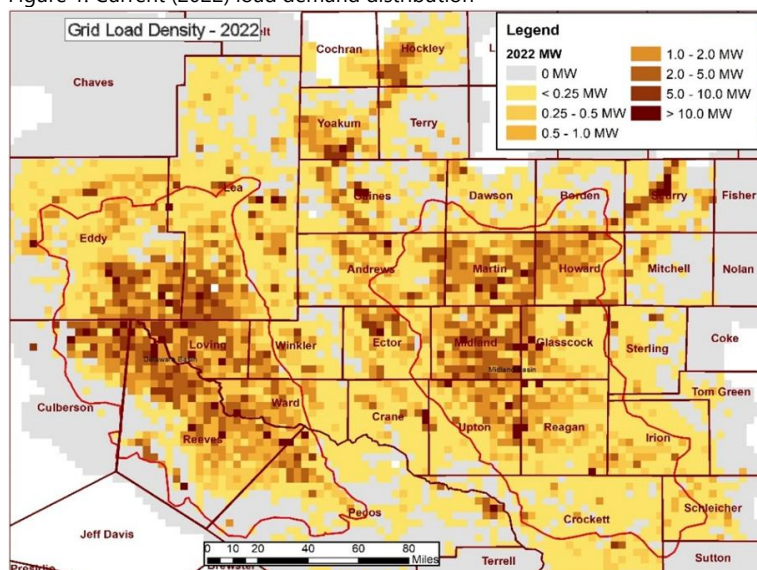
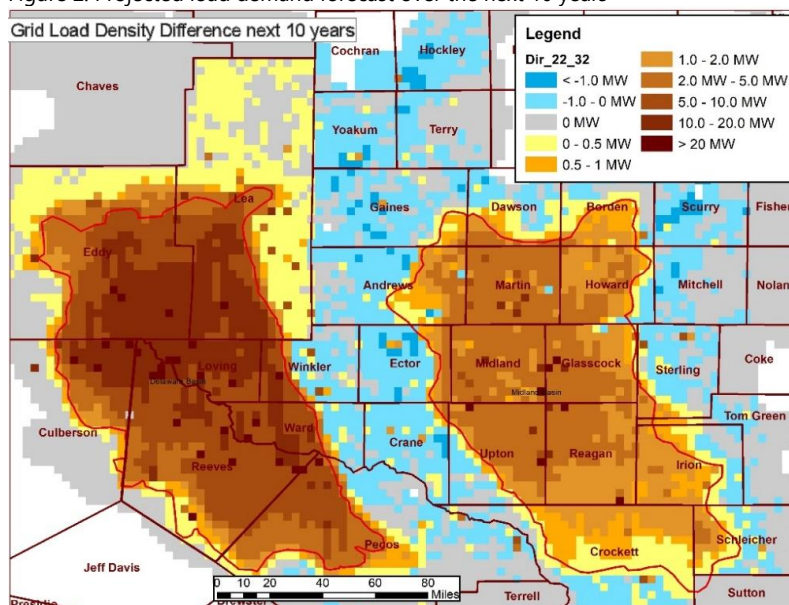


Figure 2: Projected load demand forecast over the next 10 years



ConocoPhillips' Climate Risk Strategy will help us responsibly meet the global demand for energy and a return on capital, while safely meet our previously established operational emissions-reduction targets. The company's plan requires applying strategic capabilities and resources to meet the risks posed by climate change in an economically viable, accountable, and actionable way that balances the interests of our stakeholders. Electrification of equipment and facilities is critical to support emissions reductions. ConocoPhillips plans to focus on reducing Scope 1 and Scope 2 emissions by implementing emissions reduction projects and shifting from small, onsite

natural gas power generation units to grid-connected electric power in New Mexico. These electrification efforts will involve significant capital investment in Southeast New Mexico and require a robust workforce to install and monitor the associated equipment.

To reduce emissions by electrifying equipment, ConocoPhillips is reliant on SPS's ability to timely meet the current and forecasted electricity demand in Lea and Eddy counties, specifically by interconnecting SPS's new proposed generation resources as part of this certification effort. Certification by the EDD will allow for a faster approval timeline at the New Mexico Public Regulation Commission (PRC). This expedited timeline is crucial for getting these new generation resources constructed and online by SPS's projected in-service dates of 2028-2030.

In conclusion, economic growth and reduction of emissions in New Mexico cannot happen in an ideological vacuum. It will require parallel actions from multiple sources to accomplish this important task. The first step is EDD issuing certification for SPS's economic development projects because these projects result in significant capital investment and associated job growth. Economic power flows from electric power, and the benefits of economic development across many sectors of the job market in this rural part of New Mexico cannot be overstated. Getting these projects online as quickly as possible requires certification from your department. We urge you to certify SPS's projects as economic development projects.

Thank you in advance for your time and consideration in issuing this Certification for these economic development projects.

Best,

/s/ Aaron Hunter

Aaron Hunter

ConocoPhillips Vice President, Delaware Basin

From: [Cyndi Bemis \(beautywaywalk@gmail.com\)](mailto:beautywaywalk@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 6:18:03 AM

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

Dear New Mexico Economic Development Department,

Too many agencies are not complying with safeguards put in place to protect our well being. Our health starts with protections of our birthright for clean air, water and soil!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Cyndi Bemis
1007 Miramon Ave SW
Albuquerque, NM 87105
beautywaywalk@gmail.com
(505) 217-8030

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Danielle Berd \(danceb@cox.net\)](mailto:danceb@cox.net) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:07:26 PM

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Sincerely,

Danielle Berd
325 Encantado Ridge Ct NE

Rio Rancho, NM 87124
danceb@cox.net
(352) 816-0089

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From: [David Carmichael \(btrout22@hotmail.com\)](mailto:btrout22@hotmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:23:48 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

David Carmichael
1369 Fairway Village Dr

Las Cruces, NM 88007
btrout22@hotmail.com
(915) 204-7558

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From: [David P Rose \(dprose52@gmail.com\)](mailto:dprose52@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:19:43 PM

You don't often get email from dprose52@foradvocacy.com. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

SPS is trying to skirt around NM requirements and add another antiquated gas fired electric generating station. Please don't allow this dirty generation to happen.

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Sincerely,

David P Rose
5 Columbine Ln
Santa Fe, NM 87506
dprose52@gmail.com
(541) 788-3109

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [DeAnna Mooney \(deanna.mooney66@yahoo.com\)](mailto:deanna.mooney66@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 9:06:20 PM

You don't often get email from deanna.mooney66@advocatefor.me. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

I see No Good Reason why NM customers should pay for projects built in TX and OK. Certainly not a good idea to expedite this permitting.

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Sincerely,

DeAnna Mooney
1304 Serinna Ct
Silver City, NM 88061
deanna.mooney66@yahoo.com
(575) 519-9740

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Deborah Nelson \(santafepainter@gmail.com\)](mailto:santafepainter@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:43:15 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Deborah Nelson
7 Jornada Ct

Santa Fe, NM 87508
santafepainter@gmail.com
(505) 570-4694

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Dee Homans \(davhom@cybermesa.com\)](mailto:davhom@cybermesa.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 4:01:10 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Dee Homans
3256 Buckman Rd

Santa Fe, NM 87507
davhom@cybermesa.com
(505) 629-7269

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Deette Spence \(dmvspence@gmail.com\)](mailto:dmvspence@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:46:08 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Deette Spence
PO Box 222

Taos, NM 87571
dmvspence@gmail.com
(713) 201-8580

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Dennis Holland \(dwhollandphd@gmail.com\)](mailto:dwhollandphd@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 7:16:47 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Dennis Holland
1008 Paseo Del Gallo

Bernalillo, NM 87004
dwhollandphd@gmail.com
(505) 404-8361

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Derek Wallentinsen \(wallythered@gmail.com\)](mailto:wallythered@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:17:57 PM

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Dear New Mexico Economic Development Department,

What? Paying for OK, TX?

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Derek Wallentinsen
2200 Lester Dr NE Apt 457
Albuquerque, NM 87112
wallythered@gmail.com
(310) 870-3133

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Dolores Pacheco \(ososmom@aol.com\)](mailto:ososmom@aol.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:30:51 PM

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

Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Dolores Pacheco
104 Solana Dr

Santa Fe, NM 87501
ososmom@aol.com
(505) 577-2112

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [DONALD TICKNOR \(tickcrow@gmail.com\)](mailto:tickcrow@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 5:45:59 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

DONALD TICKNOR
PO Box 433

Dixon, NM 87527
tickcrow@gmail.com
(715) 797-4063

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Douglas Murken \(kdmurk@prodigy.net\) Sent You a Personal Message](#)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:04:25 PM

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Dear New Mexico Economic Development Department,

This is a very important issue that I hope you will honour the voting public and that our wishes will be respected and represented. Reject this mostly out of state project grab.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Douglas Murken
1305 Estancia Real Pl
Las Cruces, NM 88007
kdmurk@prodigy.net
(415) 336-3045

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Edyne Gordon \(edynegordon@gmail.com\)](mailto:edynegordon@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 12:09:19 PM

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

Dear New Mexico Economic Development Department,

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Sincerely,

Edyne Gordon
PO Box 517

Tesuque, NM 87574
edynegordon@gmail.com
(505) 983-8994

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Elizabeth Rodgers \(bluesky3279@gmail.com\)](mailto:bluesky3279@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 6:56:49 PM

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Dear New Mexico Economic Development Department,

Please consider the future - and how clean you want that to be!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Elizabeth Rodgers
60 La Cueva St
Los Alamos, NM 87544
bluesky3279@gmail.com
(303) 717-4734

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Eric Kirtley \(enkirtley@gmail.com\)](mailto:enkirtley@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 7:44:17 AM

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Dear New Mexico Economic Development Department,

Short cuts result in public damage every single time, without fail. Stick to the process damn it!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Eric Kirtley
1505 Oregon Ave
Alamogordo, NM 88310
enkirtley@gmail.com
(808) 554-9493

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Esther Jantzen \(estherjantzen@gmail.com\)](mailto:estherjantzen@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 2:49:46 PM

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

Dear New Mexico Economic Development Department,

Integrity and transparency in public energy and health matters are very important to me.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Esther Jantzen
4500 Aztec Rd NE Apt 1
Albuquerque, NM 87110
estherjantzen@gmail.com
(213) 842-3235

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.



August 22, 2025

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S St Francis Dr.
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

On behalf First American Bank, we are writing in support of SPS' application for economic development certification of their proposed capacity expansions in southeastern New Mexico. Reliable, affordable power is essential to the success of our businesses and the long-term health of our communities, and this project will help meet that need.

Nowhere is this more urgent than in the southeast, where the oil and gas industry anchors our economy and drives opportunities for countless other businesses—from service providers and retailers to schools and training programs. Yet the lack of available power has become a serious constraint, limiting growth not only for energy producers but for the many small businesses and families that depend on them.

The capacity expansions proposed by Xcel will relieve these bottlenecks and provide the infrastructure needed to sustain growth. This is about more than megawatts on the grid; it is about enabling job creation, supporting workforce training, and ensuring New Mexico remains competitive in attracting new investment. With reliable energy as a foundation, communities across the region can continue to grow and diversify.

We respectfully urge your department to certify these projects and move them forward on the expedited PRC approval timeline. Doing so will directly benefit southeastern New Mexico and the broader state economy in a meaningful way.

Sincerely,

Steven C. Cox
Market President & Managing Officer
575-492-2450
scox@firstamb.com

From: [Francine C \(cronshaw@nmia.com\) Sent You a Personal Message](mailto:Francine.C(cronshaw@nmia.com) Sent You a Personal Message)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 6:46:35 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Francine C
PO Box 1895

Tijeras, NM 87059
cronshaw@nmia.com
(505) 555-1111

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Gary Cronin \(garycronin44@yahoo.com\)](mailto:garycronin44@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 10:38:08 AM

You don't often get email from garycronin44@advocacymessages.com. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

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Sincerely,

Gary Cronin
5900 Forest Hills Dr NE

Albuquerque, NM 87109
garycronin44@yahoo.com
(505) 310-4972

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Geneva Harstine \(almondparty@gmail.com\) Sent You a Personal Message](#)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:52:55 PM

You don't often get email from almondparty@grsdelivery.com. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

To whom it should concern

I am deeply troubled by the persistent pattern of politicians and industry heads bypassing community engagement and ignoring public opinion to pursue their interests and leave us to clean up the mess. I watched the mayor of Los Lunas betray everyone reliant on our aquifer when granting Niagara increased access based on outdated data. I have seen LANL argue for tritium release that would irradiate our state and our severely limited water supply without any studies on the impact to children and expecting mothers. The downwind communities from decades past have still only received minimal compensation for the generational suffering they were not even given a chance to consent to. New Mexicans, indigenous folks, and people everywhere deserve a seat at the table when determining large scale plans for the lands we call home. Therefore, I urge you to REJECT SPS application for expedited approval of out-of-state resources. Nothing about us without us.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Geneva Harstine
12616 Apache Pl NE
Albuquerque, NM 87112
almondparty@gmail.com
(505) 264-5266

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [George Parrish \(gjp1226@yahoo.com\)](mailto:gjp1226@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 11:30:04 PM

You don't often get email from gjp1226@p2a.co. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

Why should New Mexico customers pay for dirty gas and other projects built in Texas and Oklahoma?

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

George Parrish
226B Valentin Rd
Belen, NM 87002
gjp1226@yahoo.com
(231) 343-5404

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Glen Smerage \(glens@ufl.edu\)](mailto:glens@ufl.edu) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 10:09:51 AM

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

Dear New Mexico Economic Development Department,

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Sincerely,

Glen Smerage
187 E Chili Line Rd

Santa Fe, NM 87508
glens@ufl.edu
(505) 471-2026

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Glenn Yocum \(gyocum@whittier.edu\)](mailto:gyocum@whittier.edu) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 6:48:28 PM

You don't often get email from gyocum@advocatefor.me. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

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Sincerely,

Glenn Yocum
426 Valverde Commons Dr

Taos, NM 87571
gyocum@whittier.edu
(575) 758-3866

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Hari Rai Khalsa \(cherdikala@gmail.com\)](mailto:cherdikala@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:27:14 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Hari Rai Khalsa
16 Walnut Loop

Espanola, NM 87532
cherdikala@gmail.com
(505) 603-6070

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Heather Karlson \(sma50@hotmail.com\)](mailto:sma50@hotmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:10:55 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

Heather Karlson
PO Box 8371

Santa Fe, NM 87504
sma50@hotmail.com
(999) 999-9999

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Heidi Pollard \(succotashheidi@gmail.com\)](mailto:succotashheidi@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:51:10 PM

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Dear New Mexico Economic Development Department,

Protect the people of New Mexico!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Heidi Pollard
1715 Morningrise Pl SE
Albuquerque, NM 87108
succotashheidi@gmail.com
(505) 508-8110

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

August 22, 2025

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S St Francis Dr.
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

As business leaders committed to southeastern New Mexico's growth, IPS recognizes that reliable, affordable energy is the foundation of our economy. From oil and gas producers to small businesses, schools, and service providers, every sector depends on dependable power to operate and expand.

Yet today, power shortages are constraining growth—not only for energy producers but also for the many businesses, institutions, and families that rely on them. That is why we strongly support SPS' application for economic development certification of its proposed capacity expansion projects essential to sustaining growth, attracting investment, and ensuring long-term opportunity for our communities.

SPS' proposed capacity expansions will relieve these bottlenecks and provide the infrastructure needed to sustain development across the region.

This project is about more than adding megawatts to the grid—it is about enabling job creation, strengthening workforce training, and ensuring New Mexico remains competitive in attracting new investment. With reliable energy as a foundation, our communities can continue to grow, diversify, and thrive.

Accordingly, we stand united in support of this effort and encourage swift action to advance the proposed capacity expansions on the expedited PRC approval timeline. Doing so will deliver immediate and long-term benefits to southeastern New Mexico while contributing meaningfully to the broader state economy.

Sincerely,



Donnie Graham
COO
Ingram Professional Services, Inc.
575.393.1417
d.graham@ipsaecorp.com

From: [J Connors \(jvcphd@gmail.com\)](mailto:jvcphd@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:05:14 AM

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Dear New Mexico Economic Development Department,

Please listen to New Mexicans!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

J Connors
12 Shale Dr
Silver City, NM 88061
jvcphd@gmail.com
(575) 519-0543

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Jasper Hardesty \(joharde@gmail.com\)](mailto:joharde@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:12:22 PM

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Dear New Mexico Economic Development Department,

Those who seek to abuse the law for their own gain cannot be trusted. New Mexico needs to NOT have business partners we cannot trust.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Jasper Hardesty
903 Loma Linda Pl SE
Albuquerque, NM 87108
joharde@gmail.com
(650) 302-3248

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Jeanette Howard \(jhmountain@hotmail.com\) Sent You a Personal Message](mailto:Jeanette.Howard@jhmountain@hotmail.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:41:26 AM

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Dear New Mexico Economic Development Department,

No dirty gas and oil in Texas

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Jeanette Howard
49 Skyline Dr
Sandia Park, NM 87047
jhhmountain@hotmail.com
(505) 453-7875

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Jeanne Wheeler \(aiannanoa@yahoo.com\)](mailto:aiannanoa@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:49:02 PM

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Dear New Mexico Economic Development Department,

Please let's do the right thing for NM!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Jeanne Wheeler
PO Box 1436
Questa, NM 87556
aiannanoa@yahoo.com
(808) 383-9836

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Jeffrey Colledge \(jeffcolledge@hotmail.com\)](mailto:jeffcolledge@hotmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:39:35 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Jeffrey Colledge
PO Box 455

Truchas, NM 87578
jeffcolledge@hotmail.com
(505) 488-1585

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Jeremy Meade \(jmeade16@outlook.com\)](mailto:jmeade16@outlook.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Monday, August 25, 2025 10:42:48 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Jeremy Meade
2060 Thomas Dr

Las Cruces, NM 88001
jmeade16@outlook.com
(517) 918-8449

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Jill Joseph \(jjoseph2533@gmail.com\)](mailto:jjoseph2533@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 6:53:45 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Jill Joseph
3466 Cerrillos Rd

Santa Fe, NM 87507
jjoseph2533@gmail.com
(505) 712-2997

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Joan Dickerson \(sisterdog58@gmail.com\) Sent You a Personal Message](#)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:51:02 PM

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Dear New Mexico Economic Development Department,

New Mexico businesses should not be allowed to duck the energy transition act by building energy generation plants outside the state. This is a purely self-serving scam and hurts not only New Mexicans but also the residents nearby the proposed plants. Please reject this application!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Joan Dickerson
4721 Las Plazuelas
Santa Fe, NM 87507
sisterdog58@gmail.com
(512) 914-6632

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Joanne Cockerill \(joannecockerill@hotmail.com\)](mailto:joannecockerill@hotmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 11:44:34 AM

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Dear New Mexico Economic Development Department,

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Joanne Cockerill
91 N Fork Walnut Creek Rd

Silver City, NM 88061
joannecockerill@hotmail.com
(575) 388-2788

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [John and Carolyn Wilson \(johnwilson333@gmail.com\) Sent You a Personal Message](#)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:03:54 PM

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Dear New Mexico Economic Development Department,

We want a healthy future for the planet. This is why the regs exist.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

John and Carolyn Wilson
PO Box 86
Magdalena, NM 87825
johnwilson333@gmail.com
(575) 518-8840

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

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Sincerely,

Jon Klingel
47 Star Vista Rd
Santa Fe, NM 87505
jon@klingel.name
(505) 660-9462

Dear New Mexico Economic Development Department,

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Sincerely,

Judith Novak

250 E Alameda St Apt 333

Santa Fe, NM 87501

jnj@centurylink.net

(505) 989-3391

From: [K C Spivey \(kcspivey@hotmail.com\)](mailto:kcspivey@hotmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 7:47:47 AM

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Dear New Mexico Economic Development Department,

Public, tax payer weigh is significant for such long term projects.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

K C Spivey
9308 Altamonte Ave NE
Albuquerque, NM 87111
kcspivey@hotmail.com
(505) 712-9014

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [K Obermueller \(kompoberola@web.de\)](mailto:kompoberola@web.de) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 1:54:59 AM

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Dear New Mexico Economic Development Department,

Please keep new fossil fuels out of New Mexico's electricity mix !!! Thank you.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

K Obermueller
1635 Calle Del Ranchero NE
Albuquerque, NM 87106
kompoberola@web.de
(505) 277-0201

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Karen Bender \(golden@newmexico.com\) Sent You a Personal Message](#)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Monday, August 25, 2025 10:42:46 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Karen Bender
205 County Road A4A

Sapello, NM 87745
golden@newmexico.com
(505) 426-8750

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Karen Syzdek \(kschut@sbcglobal.net\)](mailto:kschut@sbcglobal.net) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 9:59:44 PM

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Dear New Mexico Economic Development Department,

The future should focus on renewable energy, so please do not approve this plan to use more fossil fuels for our energy needs.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Karen Syzdek
172 Santiago Cir
Alto, NM 88312
kschut@sbcglobal.net
(915) 526-6787

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Karen Vargas \(karenannvargas@live.com\)](mailto:karenannvargas@live.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:03:33 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

Karen Vargas
PO Box 322

El Prado, NM 87529
karenannvargas@live.com
(575) 224-1994

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Karen Vigil \(karvigil@aol.com\)](mailto:karvigil@aol.com) Sent You a Personal Message
To: constituent.services_EDD
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 9:37:44 PM

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Dear New Mexico Economic Development Department,

We are paying enough taxes as it is, and we don't need the dirty gas!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Karen Vigil
2324 Commercial St NE
Albuquerque, NM 87102
karvigil@aol.com
(512) 289-4681

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Kathleen Cody \(kitcody@hotmail.com\)](mailto:kitcody@hotmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:41:02 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Kathleen Cody
3821 Palo Duro Ave NE

Albuquerque, NM 87110
kitcody@hotmail.com
(505) 918-3403

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Kathy Jaramillo \(kattyj123@live.com\)](mailto:kattyj123@live.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:45:30 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

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At least one of the projects under consideration would likely violate the New Mexico Energy Transition Act unless SPS is granted a waiver. The EDD shouldn't issue what amounts to a pre-approval at the PRC for a utility to skirt another New Mexico law.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Kathy Jaramillo
404 W Cedar St Apt C

Farmington, NM 87401
kattyj123@live.com
(505) 446-1895

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Laura Stewart \(yogini850@gmail.com\)](mailto:yogini850@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 9:35:39 AM

You don't often get email from yogini850@grsdelivery.com. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Laura Stewart
30 Calle De Los Alamos

Santa Fe, NM 87506
yogini850@gmail.com
(575) 770-0277

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Laura Taylor \(pitttaylor@gmail.com\)](mailto:pitttaylor@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 7:01:23 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Laura Taylor
55 Camino Soledad

San Jose, NM 87565
pittttaylor@gmail.com
(917) 455-8971

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Lea Black \(leapblack@gmail.com\)](mailto:leapblack@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 10:17:53 PM

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Dear New Mexico Economic Development Department,

No!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Lea Black
19 Apache Ridge Rd
Santa Fe, NM 87505
leapblack@gmail.com
(906) 281-1914

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Lee Bartlett \(leebart53@gmail.com\)](mailto:leebart53@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 11:50:58 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Lee Bartlett
4385 Cottonwood Rd

Silver City, NM 88061
leebart53@gmail.com
(406) 210-4584

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Les Roberts \(hobo17pollie@gmail.com\)](mailto:hobo17pollie@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:55:08 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Les Roberts
400 Hill St Trlr 9

Raton, NM 87740
hobo17pollie@gmail.com
(575) 421-7272

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.



August 21, 2025

VIA ELECTRONIC SUBMISSION

Secretary Rob Black
Cabinet Secretary
NM Economic Development Department
110 S. St. Francis Drive
Santa Fe, NM 87505-4147

Re: Comment in Support of SPS' Request for Economic Development Certification

Permian Resources Operating, LLC (Permian Resources) is writing in support of Southwestern Public Service Company's (SPS) request for Economic Development Certification from the New Mexico Economic Development Department (EDD), pursuant to Section 62-2-26(F) NMSA, as contemplated in Senate Bill 170.

Permian Resources is an independent oil and natural gas company and the sixth largest oil producer in the State of New Mexico. In New Mexico, Permian Resources operates exclusively in the Permian Basin, specifically the Northern Delaware Subbasin located in Lea and Eddy Counties, overlapping with SPS's service territory in New Mexico. In 2024, Permian Resources contributed approximately \$210 million in New Mexico state royalties and \$285 million in New Mexico state taxes, making our company a major contributor to the state's economy.

As described in SPS's request, the generation projects proposed will support new electric load requests resulting in significant economic development in Southeast New Mexico. The projects included in SPS's request will not only result in direct investment in the proposed generation facilities, the increased capacity brought onto the grid by these projects will also allow for broad economic development across many sectors in Southeast New Mexico, including but not limited to new investment from the oil and gas industry.

Permian Resources currently deploys hundreds of natural gas generators in Southeast New Mexico to produce oil and gas from our wells. Starting with SPS's new generation resources, getting grid connected would result in significant emissions reductions by allowing our company to decommission those generators. Certification by the EDD will allow for a faster approval timeline at the New Mexico Public Regulation Commission (PRC). This expedited timeline is crucial for getting these new generation resources constructed and online by SPS's projected in-service dates of 2028-2030.

The oil and gas industry is a critical economic driver for the State of New Mexico. To continue powering the state's economy, it is critical that operators in Southeast New Mexico have near-term access to grid interconnection. Getting these projects online as quickly as possible requires certification from your department. We urge you to certify SPS's projects as economic development projects.

Thank you in advance for your time and consideration in issuing this Certification for these economic development projects.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jonny Heins", with a stylized flourish at the end.

Jonny Heins,
Vice President of Corporate Affairs, Permian Resources

From: [Liliana Castillo \(liliana@singlepacestrategies.com\) Sent You a Personal Message](mailto:liliana@singlepacestrategies.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPSandapos;s application for expedited permitting of out-of-state development
Date: Thursday, August 21, 2025 3:45:19 PM

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Dear New Mexico Economic Development Department,

This is not what SB170 is for.

I am writing to urge the Economic Development Department to deny Southwestern Public Serviceandapos;s application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Liliana Castillo
12145 N Highway 14, N1
Cedar Crest, NM 87008
liliana@singlespacestrategies.com
(575) 219-9619

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Linda Morgan \(limorgan47@gmail.com\)](mailto:limorgan47@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:49:42 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Linda Morgan
8 Camino De Las Mananitas

Los Lunas, NM 87031
limorgan47@gmail.com
(505) 555-5555

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Lisa Crowner \(lecrowner@yahoo.com\)](mailto:lecrowner@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 12:05:11 PM

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Dear New Mexico Economic Development Department,

New Mexico is working hard for energy transition to renewables and passed a law to facilitate the transition. Now SPS wants an exemption. Why would we want to allow them to quickly bypass the proper scrutiny by the Public Regulation commission and concerned citizens? Please deny SPS application to expedite this approval of out of state resources.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Lisa Crowner
1 Forest Ridge Trl
Silver City, NM 88061
lecrowner@yahoo.com
(505) 538-5825

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Lisa Giombolini \(mudpie8@gmail.com\)](mailto:mudpie8@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:42:06 PM

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Dear New Mexico Economic Development Department,

Please deny this!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Lisa Giombolini
2025 Quail Run Dr NE
Albuquerque, NM 87122
mudpie8@gmail.com
(505) 821-3191

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Lisa Gould \(lisal Gould@gmail.com\)](mailto:lisal Gould@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 9:06:37 AM

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

Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Lisa Gould
5301 Antequera Rd NW Apt 323

Albuquerque, NM 87120
linalgould@gmail.com
(336) 837-9833

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Lucinda Marker \(lucindamarker@gmail.com\) Sent You a Personal Message](mailto:lucindamarker@gmail.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 9:17:12 PM

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Dear New Mexico Economic Development Department,

Just what exactly is the big hurry all about? Please deny this expedited review and approval. This is deeply concerning.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Lucinda Marker
9 Cayuse Pl
Santa Fe, NM 87508
lucindamarker@gmail.com
(505) 490-3033

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Lynne Buchen \(lynneloucksbuchen@comcast.net\)](mailto:lynneloucksbuchen@comcast.net) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 6:59:47 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Lynne Buchen
424 Kathryn Pl

Santa Fe, NM 87501
lynneloucksbuchen@comcast.net
(505) 982-4075

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Marena Drlik \(drlik@inreach.com\) Sent You a Personal Message](mailto:drlik@inreach.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 6:52:38 PM

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Dear New Mexico Economic Development Department,

New Mexican customers should NOT pay for dirty gas and other projects built in Texas and Oklahoma. We cannot tie the hands of the PRC and environmental and consumer groups to properly review and oppose new fossil-fuel facilities. New Mexico has voted for green energy and this move is a run around to help Oklahoma and Texas continue their dirty energy ways. Please REJECT the SPS application.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Marena Drlik
8401 Spain Rd NE Apt 58P
Albuquerque, NM 87111
drlik@inreach.com
(510) 590-1760

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Margaret DeLong \(mardel18@aol.com\) Sent You a Personal Message](mailto:mardel18@aol.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:53:13 PM

You don't often get email from mardel18@advocatesmessage.com. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Margaret DeLong
10016 Blume St NE

Albuquerque, NM 87112
mardel18@aol.com
(505) 299-0082

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Maria Oroyan \(mcrooyan@gmail.com\)](mailto:mcrooyan@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:59:29 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Maria Oroyan
10401 Country Manor Pl NW

Albuquerque, NM 87114
mcoroyan@gmail.com
(505) 715-6753

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Maribeth Hulsey \(maribethulsey@gmail.com\)](mailto:maribethulsey@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:33:56 PM

You don't often get email from maribethulsey@grsdelivery.com. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

I care a lot about this as someone who grew up in New Mexico and wants to see the young people around here who are growing up to have good wholesome representation in service of their health and protecting the environment and everything in between...long-sighted economic planning is critical to that. We need you to stand up for the best New Mexico can produce and for the time to get clear on what that is. We andapos;ve always wanted to avoid stampeding whenever possible here in the Southwest and a nest of issues like this that can complicate the complex of issues we already see around us and clouding our futures. Our youth deserve care and opportunities to improve their future prospects rather than be weighted down by out-of-state projects that donandapos;t respect our needs, claims and guidelines.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Maribeth Hulsey
3271 Solarridge St
Las Cruces, NM 88012
maribethulsey@gmail.com
(575) 288-5953

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Martha Anderson \(shadetreemja@yahoo.com\)](mailto:shadetreemja@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 12:55:35 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Martha Anderson
11002 Snowheights Blvd NE

Albuquerque, NM 87112
shadetreemja@yahoo.com
(505) 293-0605

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Mary Drabbs \(marydrabbs@gmail.com\)](mailto:marydrabbs@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:27:58 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Mary Drabbs
6900 Hensch Ave NE

Albuquerque, NM 87109
marydrabbs@gmail.com
(575) 749-2498

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Mary McIntyre \(jonbeboy@yahoo.com\)](mailto:jonbeboy@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 9:00:21 PM

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Dear New Mexico Economic Development Department,

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Mary McIntyre
376 Ruffles Ln

Corrales, NM 87048
jonbeboy@yahoo.com
(505) 463-8217

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Mary Orr \(mvorr01@gmail.com\)](mailto:mvorr01@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 7:43:23 AM

You don't often get email from mvorr01@sendgrassroots.com. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

Protecting our environment is foremost. People before profit. Follow the laws and the rules.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Mary Orr
592 County Road 57
Ohkay Owingeh, NM 87566
mvorr01@gmail.com
(505) 852-9017

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Mary Robison \(themkgroup@aol.com\)](mailto:themkgroup@aol.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 6:53:17 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Mary Robison
8 Verano Dr

Santa Fe, NM 87508
themkgroup@aol.com
(505) 466-7440

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Mary Russell-Jenkins \(mhrussell62@yahoo.com\)](mailto:mhrussell62@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:32:47 AM

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Dear New Mexico Economic Development Department,

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Sincerely,

Mary Russell-Jenkins
2803 Quincy St NE

Albuquerque, NM 87110
mhrussell62@yahoo.com
(505) 999-6926

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Matthew Redington \(mantra11@hotmail.com\) Sent You a Personal Message](mailto:mantra11@hotmail.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:14:07 PM

You don't often get email from mantra11@forgrassroots.com. [Learn why this is important](#)

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Matthew Redington
1333 Maez Rd Apt B

Santa Fe, NM 87505
mantra11@hotmail.com
(413) 325-4708

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.



MAYOR'S OFFICE

200 East Broadway
Hobbs, New Mexico 88240
scobb@hobbsnm.org

575-391-7890
575-391-7876 fax

SAM D. COBB

Mayor

8-21-25

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S St Francis Dr.
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

On behalf of the City of Hobbs, we are writing in support of SPS' application for economic development certification of their proposed capacity expansions in southeastern New Mexico. Reliable, affordable power is essential to the success of our businesses and the long-term health of our communities, and this project will help meet that need.

Nowhere is this more urgent than in the southeast, where the oil and gas industry anchors our economy and drives opportunities for countless other businesses—from service providers and retailers to schools and training programs. Yet the lack of available power has become a serious constraint, limiting growth not only for energy producers but for the many small businesses and families that depend on them.

The capacity expansions proposed by Xcel will relieve these bottlenecks and provide the infrastructure needed to sustain growth. This is about more than megawatts on the grid; it is about enabling job creation, supporting workforce training, and ensuring New Mexico remains competitive in attracting new investment. With reliable energy as a foundation, communities across the region can continue to grow and diversify.

We respectfully urge your department to certify these projects and move them forward on the expedited PRC approval timeline. Doing so will directly benefit southeastern New Mexico and the broader state economy in a meaningful way.

Sincerely,
Sam D. Cobb
Mayor
City of Hobbs, New Mexico
575-391-7890
scobb@hobbsnm.org

From: [Melissa Bernardin \(melissabernardin7@gmail.com\)](mailto:melissabernardin7@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 5:43:50 AM

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Dear New Mexico Economic Development Department,

No special treatment for corporate polluters! Thereandapos;s a reason we have renewables requirements - to help slow planetary collapse. Absolutely, NO to this nonsense!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Melissa Bernardin
1524 Tierra Verde Loop NW
Los Lunas, NM 87031
melissabernardin7@gmail.com
(603) 828-2442

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Merry Harsh \(merry.harsh@mygait.com\)](mailto:merry.harsh@mygait.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 3:53:14 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Merry Harsh
612 E 7th St

Silver City, NM 88061
merry.harsh@mygait.com
(575) 534-1152

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

8/22/2025

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S St Francis Dr.
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

On behalf of Mewbourne Oil Company, I respectfully submit this letter in support of SPS' application for economic development certification of its proposed capacity expansions in southeastern New Mexico. Founded in 1965, Mewbourne has grown into one of the nation's leading privately held exploration and production companies. With more than 800 employees, we provide stable, environmentally responsible production across the Anadarko and Permian Basins, with the vast majority of our operations in New Mexico.

The lack of reliable utility power threatens to limit the full potential of our operations. Instead of accessing efficient, large-scale electric service, we are forced to rely on smaller, more expensive, and less efficient generators—raising costs, increasing emissions, and undermining the region's competitiveness.

SPS' proposed expansion directly addresses this challenge. By strengthening power infrastructure, the project will reduce costs, lower environmental impacts, and spur investment in southeastern New Mexico. Reliable, affordable power is the foundation of economic development: without it, jobs and capital are lost; with it, the region can attract investment, create high-quality jobs, and fully develop New Mexico's natural resources.

For these reasons, Mewbourne Oil Company strongly supports SPS' application and respectfully urges your department to certify these projects on the expedited PRC approval timeline. Doing so will deliver meaningful benefits to southeastern New Mexico and the broader state economy.

Sincerely,

Erin McMath
Production Engineer
Mewbourne Oil Company
575-393-5905
emcmath@mewbourne.com

From: [Michael Crews \(mcrewsebdo@aol.com\)](mailto:mcrewsebdo@aol.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 1:16:39 AM

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

Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Michael Crews
6501 Caballero Pkwy NW

Los Ranchos, NM 87107
mcrewsebdo@aol.com
(505) 345-1936

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Michael Labrecque \(desertrookiexvii@comcast.net\)](mailto:desertrookiexvii@comcast.net) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 11:22:16 PM

You don't often get email from desertrookiexvii@advocatefor.me. [Learn why this is important](#)

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

Dear New Mexico Economic Development Department,

If a proposal has merit there is no need for rushed/backdoor tactics. Please very seriously consider this.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Michael Labrecque
5515 Ciento Vistas
Las Cruces, NM 88011
desertrookiexvii@comcast.net
(540) 522-1109

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

August 21, 2025

New Mexico Economic Development Department
Joseph M. Montoya Building
1100 South St. Francis Drive
Santa Fe, NM 87505

RE: Letter of Support for SPS's Application for Economic Development Certification under Senate Bill 170

Dear Cabinet Secretary Rob Black,

I am writing to express my strong support for Southwestern Public Service Company's (SPS) application for economic development certification under Senate Bill 170. The portfolio of projects submitted by SPS—specifically the 12 projects identified for certification—represents a critical investment in New Mexico's energy infrastructure and long-term economic vitality. We anticipate that Chaves County may also be part of continued conversations in this regard.

Senate Bill 170 was designed to accelerate the development of infrastructure projects that directly support economic growth. SPS's proposed projects, selected from the 2024 Request for Proposals and bid under Option 3, are not merely replacements for retiring capacity—they are forward-looking initiatives that will enable new growth across the region. These projects will help meet increasing customer demand, attract new business investment, and ensure reliable, affordable energy for communities throughout New Mexico. We need this.

The expedited timeline provided by Senate Bill 170 is essential to keeping pace with the state's evolving energy needs and economic development goal, as well as those projected for Chaves County. By granting this certification, the NMEDD will help unlock a streamlined regulatory path that allows these projects to move forward without unnecessary delay—bringing jobs, infrastructure, and opportunity to Chaves County.

I urge you to approve SPS's application and recognize the strategic importance of these projects to New Mexico's future. Thank you for your consideration and for your continued commitment to fostering economic development across our state.

Sincerely,



Michael Espiritu, MEDP, IOM, STS
President and CEO



From: [Mike Hayden \(mike@haydensf.com\)](mailto:mike@haydensf.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:29:12 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

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At least one of the projects under consideration would likely violate the New Mexico Energy Transition Act unless SPS is granted a waiver. The EDD shouldn't issue what amounts to a pre-approval at the PRC for a utility to skirt another New Mexico law.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Mike Hayden
105 Daybreak

Santa Fe, NM 87507
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(720) 989-7119

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Nancy King \(nanking1224@earthlink.net\)](mailto:nanking1224@earthlink.net) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:01:06 PM

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Sincerely,

Nancy King
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From: [Nancy Nortz \(nnortz@nmia.com\)](mailto:nnortz@nmia.com) Sent You a Personal Message
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August 22, 2025

New Mexico Economic Development Department
Southwestern Public Service Company Proposed Capacity Expansions in New Mexico

New Mexico Large Customer Group's Public Comments

The New Mexico Large Customer Group (“NMLCG”) submits these comments regarding Southwestern Public Service Company’s (“SPS”) Request for Economic Development Certification for proposed capacity expansions in New Mexico (“EDC Request”) pursuant to New Mexico Senate Bill (“SB”) 170. The NMLCG is not taking an overall position regarding SPS’s EDC Request but wants to provide a customer perspective for the New Mexico Economic Development Department (“EDD”) to consider as it reviews SPS’s EDC Request.

The NMLCG supports SPS’s efforts to bring new generation online on an expedited basis to meet SPS’s existing and growing loads. Additionally, the NMLCG supports economic development certification for individual projects that are demonstrated to be “necessary to serve reasonably anticipated *new* load,” consistent with SB 170. *See* NMSA § 62-6-26(G)(1) (emphasis added). However, the NMLCG is concerned that SPS’s “portfolio approach” to its EDD Request, which includes the majority of the projects identified through SPS’s recent competitive bidding process, does not provide sufficient information to determine which of the 12 projects are actually required to serve *new* load rather than to replace retiring resources or meet higher regional resource adequacy requirements. From a customer perspective, SPS’s approach to its EDC Request is overly broad and notably silent regarding the utility ratemaking implications from certification as an economic development project under SB 170. The NMLCG actively participates in SPS cases before the New Mexico Public Regulation Commission (“NMPRC”) where ratemaking issues are typically determined. The NMLCG has a strong working relationship with SPS in that forum and looks forward to continued discussion with SPS on ratemaking issues. However, the NMLCG is

concerned that EDD Certification takes away some of the NMPRC's discretion to consider and decide the appropriate ratemaking structure for economic development projects certified by the EDD. As explained below, a more targeted approach to economic development certification would be more consistent with SB 170 given the cost recovery implications that follow certification of a project, ensuring projects that are specifically needed to serve new loads are brought online efficiently and protecting ratepayers from an overly broad application of the law.

Background Regarding the NMLCG

The NMLCG is an informal coalition of industrial energy customers that own and operate facilities in SPS's service territory in New Mexico and was formed to participate selectively in NMPRC and other proceedings that may affect electric utility rates and service in New Mexico. The NMLCG's members depend upon reasonably priced and reliable electric service from SPS in order to operate, and expand, their businesses in New Mexico. In this case, the NMLCG's members include Chevron Power and Energy Management Company, a division of Chevron U.S.A. Inc., ConocoPhillips, HF Sinclair, and XTO Energy Inc.

Certification Portfolio Approach v. Targeted Approach.

The NMLCG supports SPS's efforts to bring new capacity resources online on an expedited timeline to reliably serve new and existing customers and comply with regional resource adequacy requirements. However, the NMLCG has concerns regarding SPS's proposed "portfolio approach" and the breadth of electric generation and capacity projects included in the EDC Request. While SPS's "portfolio approach" is consistent with how SPS evaluates and selects a portfolio of resources to meet its system needs, it also ignores the different drivers of SPS's need for new generation and capacity resources. A more nuanced evaluation of proposed economic development resources would be provided by a "targeted" review of individual generation and

capacity projects required to serve *new* load. SPS requests economic development project certification of a portfolio of 12 wind, solar, thermal, and battery projects in New Mexico, Texas, and Oklahoma consisting of approximately 2,500 megawatts (“MW”) of electric generation *at an unknown cost*. Indeed, SPS is seeking economic development certification for 12 of the 19 new capacity projects it identified in its recent Integrated Resource Planning (“IRP”) and Request for Proposals process. However, SPS’s resource needs are driven by multiple factors, not just load growth in New Mexico. Seeking certification for a dozen projects in one broad stroke does not permit the EDD to analyze each project individually to determine if they should qualify for certification as economic development projects. Given the ratemaking implications of economic development project certification described below, SPS’s portfolio approach is problematic for New Mexico customers.

SPS’s portfolio approach makes it difficult, if not impossible, to unpack how SPS evaluated resources and presented them to the EDD. While the proposed capacity projects are intended, in part, to serve new load, a portion of the new capacity is also needed to replace the capacity of SPS’s retiring electric generating units, totaling 1,601 MW of capacity. New capacity is also needed to meet increased resource adequacy requirements defined by the Southwest Power Pool, regardless of load growth. Indeed, SPS’s EDC Request is clear that the “Certification Projects both serve load growth in the areas where the projects are located *and* supports reasonably anticipated load growth within the State of New Mexico.” EDC Request, p. 10. The NMLCG notes that SPS’s EDC Request primarily focuses on the need to serve new oil and gas industry load in SPS’s service territory and clouds the fact that the 12 proposed economic development projects will be system resources designed to serve *all* of SPS’s customers, including customers in Texas. While the oil and gas industry is a significant factor in SPS’s load growth, it is not the only

factor. Indeed, SPS's 2023 IRP, the basis for these new capacity projects, states that over SPS's planning period through 2043, retail peak demand increases at a compound annual growth rate of 1.1% and is "driven by population and economic growth in the service territory, continued expansion of the oil and gas industry in southeastern New Mexico, and adoption of electric vehicles, offset in part by increasing adoption of behind-the-meter solar generation." SPS 2023 IRP, p. 67. SPS also projects that residential customer growth will average annual increases of 0.7% through 2043. *Id.* at 68.

Ratemaking Implications of Certification of Economic Development Projects

The NMLCG also highlights for the EDD's consideration the significant ratemaking implications that follow certification as an economic development project and how certification will impact the NMPRC's Certificate of Convenience and Necessity proceedings and ultimately how these resources impact customer utility bills. Notably, SPS's EDC Request is silent regarding the special NMPRC ratemaking treatment that SPS would be granted with economic development project certification, which would shift risk from SPS's shareholders to SPS's customers. While the special ratemaking treatment afforded by SB 170 is designed for new generation or capacity resources targeting new electric load in New Mexico, the same is not true for the entire portfolio of resources that SPS proposes.

Economic development project certification opens the door for, and in some cases requires, the NMPRC to permit single-issue, or "piecemeal" ratemaking. Single-issue ratemaking takes place when customers' charges are adjusted in response to a change in a single cost item considered in isolation. Such an adjustment is contrary to the basic principles of traditional utility regulation because it ignores the multitude of other factors that otherwise influence rates, some of which could move rates in the opposite direction from the single-issue change, by failing to address the

potential for counterbalancing savings in another area. The NMPRC has a “long-standing policy of preventing” piecemeal ratemaking. NMPRC Case No. 20-00158-UT, Final Order, ¶ 164 (Dec. 7, 2022).

Certification expands piecemeal ratemaking in two ways. First, SB 170 states that “reasonable costs of economic development projects shall be recoverable in rates through a rate rider, base rates, or a combination thereof, when the associated equipment and facilities begin serving the new load associated with the economic development project or the utility demonstrates that the economic development project provides benefits to existing customers.” NMSA § 62-6-26(E). The NMLCG generally opposes single-issue rate rider cost recovery for SPS system resources. Recovering the costs of these resources in a rate rider rather than through base rates would be a significant and unnecessary departure from the status quo and NMPRC policy. Second, certification permits SPS to “defer costs incurred for economic development projects that are not included in rates or a regulatory asset.” *Id.* NMPRC precedent is clear that “regulatory asset treatment should be the exception, not the norm” and that regulatory assets created through deferred accounting “insulate shareholders from risk and shift risk to ratepayers” and the “utility’s incentive to manage its business gets lost when regulatory assets are permitted.” NMPRC Case No. 15-00261-UT, Corrected Recommended Decision, p. 131 (Aug. 15, 2016). The NMPRC has also explained that “accounting orders represent a form of advance ratemaking treatment, i.e., ratemaking decisions that occur outside the context of a rate case based upon expenses that are incurred outside the test year of a rate case.” Case No. 18-00261-UT, Recommend Decision, p. 6.

While special cost recovery such as a rate rider or cost deferral *may* be appropriate for *some* capacity projects that are needed to come online quickly to serve *new* load, such preferential cost recovery is not appropriate for all 12 projects in SPS’s EDC Request. SPS’s EDC Request seeks

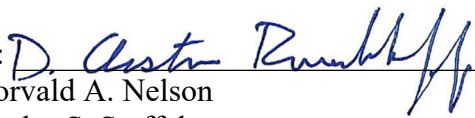
certification for the majority of the new projects SPS selected to replace retiring resources, meet higher resource adequacy requirements, and serve new load. Certification for SPS's proposed portfolio would limit the NMPRC's ability to consider the costs of the majority of the proposed resources in a general rate cast holistically alongside all of SPS's costs and revenues and not have its hands bound to certain ratemaking treatment due to economic development project certification. While the NMLCG generally agrees that there can be a shortened time for the NMPRC to consider these resources that follows from certification, the EDD should be mindful of the other regulatory implications for customers given the significant number of projects SPS included in SPS's EDC Request.

Conclusion

The NMLCG appreciates SPS's efforts to bring new resources online quickly to replace retiring resources and meet SPS's load growth. While certification as an economic development project might be appropriate for some of the 12 projects presented in SPS's EDC Request, SPS's approach is overly broad and does not provide the EDD with sufficient information to determine which of the 12 projects is required to serve *new* load. The NMLCG encourages the EDD to consider all of the implications of economic development project certification for the portfolio of resources SPS has presented, potentially in consultation with the NMPRC, and evaluate whether a more targeted approach would be more consistent with the goals of SB 170, which is intended to address those facilities needed to serve "reasonably anticipated new load."

Respectfully submitted August 22, 2025.

HOLLAND & HART LLP

By: 

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**Attorneys for the
New Mexico Large Customer Group**

35608475_v5

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Dear New Mexico Economic Development Department,

Please protect New Mexico ratepayers, New Mexico's environment, and opportunities for economic development within New Mexico. Please maintain the Public Regulation Commission's ability to do its job of properly reviewing and regulating new projects to ensure that such projects comply with the letter and the spirit of New Mexico's laws.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Nona Girardi
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This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

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Dear New Mexico Economic Development Department,

The idea that SPS has applied for the economic development certificate is absurd. It sets a dangerous precedent to get their entire portfolio fast tracked when so little of it fits the criteria for the certificate! Can we put a STOP to the end runs around the intent and the rules? Please!

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Sincerely,

Ona Porter
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(505) 228-7506

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

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Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
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Dear New Mexico Economic Development Department,

NM Economic Development Department, DO NOT grant this certification! This proposal deserves to be properly reviewed by the Public Regulation Commission as well as consumer and environmental groups. New Mexico must take a stand to appropriately regulate dirty fossil fuels, if not entirely reject them for alternate clean power sources.

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Dear New Mexico Economic Development Department,

New Mexicans are very tired of companies exploiting our resources and having no accountability for their impact on the environment. We are watching.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Patricia Brown
2420 Calle Contessa
Santa Fe, NM 87505
wisdomwave80@gmail.com
(505) 455-2268

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Patricia Duncan \(pgnm@comcast.net\)](mailto:pgnm@comcast.net) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:35:52 PM

You don't often get email from pgnm@advocatefor.me. [Learn why this is important](#)

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

Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Patricia Duncan
1080 Carnival Ave NW

Los Lunas, NM 87031
pgnm@comcast.net
(505) 514-3986

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Patricia Foschi \(trish.foschi@gmail.com\)](mailto:trish.foschi@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 9:59:52 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Patricia Foschi
538 Garcia St

Santa Fe, NM 87505
trish.foschi@gmail.com
(505) 913-0403

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Patricia Heck \(trish.heck@gmail.com\)](mailto:trish.heck@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:19:13 PM

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Dear New Mexico Economic Development Department,

They are rich and weandapos;re not. Why should we subsidize them?

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Patricia Heck
47 Oxbow Dr
Silver City, NM 88061
trish.heck@gmail.com
(575) 534-0207

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: Patrick Ramsey (pat@pataeronautics.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 1:21:28 AM

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Dear New Mexico Economic Development Department,

Letandapos;s use common sense.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Patrick Ramsey
817 Alameda Road NW
Albuquerque, NM 87114
pat@pataeronautics.com
(505) 792-9270

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

Dear New Mexico Economic Development Department,

Please do not reverse the progress the state is making toward electrification.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Patrick Vaughan

6261 Belvedere Loop

Las Cruces, NM 88012

vaughan.patrick@att.net

(707) 502-7606

From: [Paul Luehrmann \(pluehrmann@cybermesa.com\)](mailto:pluehrmann@cybermesa.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 6:56:33 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Paul Luehrmann
223 N Guadalupe St PMB #294

Santa Fe, NM 87501
pluehrmann@cybermesa.com
(505) 995-8167

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Peg Borchardt \(pegborchardt@gmail.com\)](mailto:pegborchardt@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:13:49 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Peg Borchardt
520 Tomasita St NE

Albuquerque, NM 87123
pegborhardt@gmail.com
(505) 463-6477

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

Please provide your public comment below:

Secretary Rob Black
Cabinet Secretary
NM Economic Development Department
110 S. St. Francis Drive
Santa Fe, NM 87505-4147

Re: Comment in Support of SPS Proposed Capacity Expansions in New Mexico Request for Economic Development Certification

The New Mexico Oil and Gas Association (NMOGA) supports SPS' Request for Economic Development Certification. NMOGA is a coalition of oil and natural gas companies, individuals, and stakeholders dedicated to promoting the safe and environmentally responsible development of oil and natural gas resources in New Mexico. Representing over 200 member companies, NMOGA works with elected officials, community leaders, industry experts, and the public to advocate for responsible oil and natural gas policies and increase public understanding of industry operations and contributions to the state.

NMOGA supports EDD's efforts to ensure availability and reliability of New Mexico's power grid for current and future business and SPS' efforts to achieve Economic Development Certification. NMOGA respectfully requests continued collaboration with SPS, EDD, and the Public Regulation Commission to achieve maximum collaboration and potential for the company's "portfolio approach" to create a targeted opportunity to limit cost recovery implications, protect ratepayers, and ensure line efficiency for new loads.

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S. St. Francis Drive
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

I write to express my support for Southwest Public Service Company's application for an Economic Development Certificate. As a State Senator, a long-serving member of the Eunice School Board, and someone who has worked for decades in the construction industry supporting both energy operations and community infrastructure, I understand how essential reliable power is to the future of our region.

In southeastern New Mexico, we are seeing energy demand rise faster than ever before. Families, schools, small businesses, and industries of every kind depend on stable and affordable electricity. Without it, our ability to grow, diversify, and attract new opportunities is limited. Through my work, I see firsthand how closely tied reliable infrastructure is to both the success of oil and gas operations and to the vitality of other sectors of our economy. When energy supply is strong, it supports every part of our communities.

That is why the process we passed during the last legislative session is so important. It recognizes that New Mexico must modernize how projects are approved in order to meet rising demand and avoid delays that can create unnecessary costs or put communities at risk during peak seasons. The changes

Dear New Mexico Economic Development Department,

I am Martina Sittler, Vice President of Engineering & Construction at Targa Northern Delaware ("Targa"). I write to strongly endorse Southwestern Public Service Company's (SPS) Request for Economic Development Certification under Senate Bill 170. Targa values this opportunity to support a process that delivers critical energy resources to fuel New Mexico's economic growth. We applaud Governor Michelle Lujan Grisham's leadership in advancing such impactful initiatives.

Targa, a leading midstream pipeline services provider and one of North America's largest independent midstream infrastructure companies, operates a natural gas gathering system in Lea and Eddy Counties. To sustain and expand our operations, Targa requires reliable, scalable power generation to support both current demands and future investments in New Mexico.

Certifying SPS's proposed 14 wind, solar, thermal, and battery storage systems is vital for timely development to drive economic growth. These resources are a critical first step, as New Mexico's expanding economy will require additional generation and infrastructure to meet rising energy needs. Targa's commitment to electrification in oil and gas operations highlights the need for robust grid power. Since 2015, we have invested heavily in electric compression, deploying 140,600 horsepower at new gas plants and 28,000 horsepower in gathering operations in 2023 alone. SPS's proposed resources are essential to advancing these efforts, aligning with New Mexico's environmental goals. We support streamlining New Mexico Public Regulation Commission processes, including Integrated Resource Plans, Renewable Portfolio Standards, and Certificates of Convenience and Necessity (CCNs).

Southwestern Public Service Company (SPS), is attempting to take advantage of new law SB170 in order to have an easier time getting approval to build over five gigawatts of new power generation.

As I understand it, Senate Bill 170 was meant to make site readiness for NEW economic development projects in New Mexico easier. To me this refers to utility investments that are needed to deliver electric service to a particular location or area within New Mexico that is specifically designated and prepared for the purpose of attracting and facilitating economic development and growth, such as business parks or planned communities in New Mexico.

Instead, SPS is asking the Economic Development Department to violate that intent by funding projects SPS was planning to build anyway, renaming them 'special economic development projects. Please see the uploaded letter below.

potential to drive down costs for drilling, completions, production, and midstream activities, and to further our efforts to reduce emissions. Since 2023, load request approvals have been paused pending additional transmission capacity into Southeast New Mexico. Due to the longer timelines associated

As Executive Director of the Carlsbad Department of Development, an economic development organization located in one of the U.S.'s premiere energy epicenters, I strongly support SPS's New Mexico Economic Development Application for new power generation projects to meet customer needs through 2030.

This project represents a strategic investment in both the state's and southeastern New Mexico's immediate future that New Mexico cannot afford to overlook. In today's environment, regions across the country are competing aggressively for energy infrastructure, industrial investment, and advanced manufacturing opportunities. If we do not move quickly to expand grid capacity and reliability, those projects and the high-paying jobs they bring will bypass New Mexico altogether.

The preliminary estimate of total direct economic benefits in New Mexico is more than \$1 billion over 35 years, with an additional \$5 billion anticipated from oil and gas industry capital investments tied to electrification over the next five years. These figures highlight the scale of statewide benefit—but the most urgent examples of need are right here in Lea and Eddy Counties. Forecasts project load growth ranging between 10% and 38%, driven by industrial expansion, manufacturing recruitment, and continued oil and gas development. Without timely investment in grid capacity and storage, we risk stalling projects that directly create jobs, expand the tax base, and secure New Mexico's position as a national energy leader.

I strongly support the Certificate of Convenience and Necessity application for the Gaines County Power Plant. As a member of the energy committee, I recognize this project's critical importance to our region.

This power plant will:

- Create jobs and generate tax revenue for local communities
- Meet growing energy demands in the Permian Basin
- Support continued oil and gas operations essential to New Mexico's economy
- Enhance grid reliability and energy security

The oil field operations in southeastern New Mexico contribute billions in state revenue and support thousands of jobs. Reliable power generation is fundamental to sustaining this vital economic sector.

I urge the Commission to approve this application for the significant economic and energy benefits it will deliver to New Mexico.

Respectfully,

greenhouse gas emissions that harm the environment, public health, and economy including insurance rates or the availability of insurance anywhere. Because of the devastating effects of climate change to economies in the form of increased disasters, dangerous heat, wildfires, adding gas would clearly not grid "economic development." Putting a gas plant in Texas is NOT economic development of New Mexico, no matter how they spin it.

areas. Approving SPS's request would shorten review, shift costs to NM customers, and set a bad precedent that any utility project counts as economic development. These aren't NM projects and shouldn't be certified. Climate change is costing me plenty already - from home insurance to treating Please see attached from Justin Howalt with the City of Clovis

1. To continue economic growth in the Delaware Basin the utility provider needs to provide feedback on new load requests in a timelier manner. This way we can incorporate power supply requirements Certification of Their New Generation Resources

submitted Aug 20, 2025

Southwestern Public Service Company (SPS) is asking the New Mexico Economic Development Department (EDD) for a certificate to expedite the construction of five gigawatts of electrical power generation. This application depends upon the new law SB170, which was passed in the 2025 regular legislative session to enhance economic development in New Mexico.

This request for certification is not an appropriate use of SB170. The majority of the new power would be for new energy resources located in Texas and Oklahoma. Two gigawatts would be new natural gas generation, which would add to greenhouse gas emissions and exacerbate the worsening the climate crisis.

The load application of this new power is vague. It seems that the new power would be used primarily for oil and gas extraction in southeastern New Mexico. Senate Bill 170 is intended to facilitate site readiness for new economic development projects in New Mexico. It allows a utility to ask the Economic Development Department to certify a project as contributing substantively to "reasonably expected economic development". The legislation was presented to the public and to legislators as enabling faster development of electricity resources for places like industrial parks and rapidly growing communities.

The EDD should not certify this huge request for new energy development. Instead, SPS should apply to the Public Regulation Commission through the normal processes for new power generation. Southwestern Public Service Company/Xcel Energy's request for economic development certification of its 14 wind, solar, thermal, and battery energy storage system projects. These projects represent a significant long-term investment in our region's energy infrastructure and economic future. Beyond the immediate creation of construction and operations jobs, the projects will generate

Secretary Rob Black
New Mexico Economic Development Department
Joseph M. Montoya Building
1100 S. St. Francis Drive
Santa Fe, NM 87505

RE: Support for Southwestern Public Service Company's Proposed Capacity Expansions in New Mexico

Secretary Black,

Civitas Resources, Inc. is an oil and natural gas exploration and production company headquartered in Denver with operations in Southeast New Mexico. Today, we write in support for Southwestern Public Service Company's (SPS) proposed capacity expansions in New Mexico.

Expanding SPS's generation and transmission capacity is critical to addressing rising electricity demand in southeast New Mexico, particularly as the region experiences robust economic growth driven by the oil and gas sector and expanded industrial activity. The retirement of traditional generation resources, rapid load growth, and large-scale investments—such as the electrification of buildings and transportation—underscore the urgent need for infrastructure upgrades and additional accredited capacity resources.

The economic and fiscal impacts of this expansion are substantial:

- Increased reliability and capacity will support ongoing oil and gas operations, responsible for more than 50% of local commercial and industrial electricity sales.
- The expansion will facilitate industrial development in Lea and Eddy counties, where New Mexico MWh sales have grown by over 700MW in the past decade, with 1,300MW of new load requested by 2027.
- Infrastructure investment will create jobs, attract new businesses, and increase economic opportunities in the region, directly in line with the mission of the New Mexico Economic Development

Dear Secretary Black,

On behalf of the Rio Grande Foundation, I am writing to express support for Southwest Public Service Company's request for an Economic Development Certificate. As New Mexico's free-market think tank focused on taxpayers and ratepayers, we believe this project represents the kind of investment that strengthens the economy while protecting consumers from unnecessary costs.

Affordable, reliable energy is essential for families and small businesses, and it is often one of the most visible costs borne by ratepayers. When the energy supply is stable and well-planned, it helps avoid sharp spikes in utility bills that can strain household budgets and place small businesses at risk. By creating the conditions for economic growth, this project can foster new business activity and job opportunities without expanding government or relying on burdensome subsidies.

A healthier economy directly benefits taxpayers. A stronger, more vibrant private sector means more opportunity, more jobs, and less pressure on public resources. At the same time, accountability and transparency in how these investments are managed is critical to ensuring that ratepayers receive the promised benefits without hidden costs. We encourage the Department to approve this application while continuing to safeguard consumers by ensuring the project is implemented in a fiscally

On behalf of the Associated Builders and Contractors, we are writing to express our strong support for Southwest Public Service Company's request for an Economic Development Certificate. Reliable, affordable power is the cornerstone of growth, and this project will provide the energy foundation that New Mexico's businesses and communities need to expand and thrive.

When new energy resources are secured, it sparks a chain reaction of opportunity. Companies are more likely to invest in new facilities, existing employers gain the confidence to expand, and communities can plan for sustainable growth. Each of these actions directly drives demand for commercial construction—new offices, retail centers, industrial sites, infrastructure improvements, and housing developments. Our members take pride in delivering these projects, creating spaces where businesses succeed and communities prosper.

For the construction industry, projects like this are more than an economic boost—they are catalysts for long-term development. They enable contractors to take on larger, more innovative projects, create high-quality jobs, and strengthen the skilled workforce that is the backbone of New Mexico's economy.

In their request, SPS is mis-using New Mexico's new statute (SB170) by asking the NM EDD to certify "as necessary for economic development" SPP's proposed build of 14 electric power plants, including many "not in New Mexico", ie in Texas or Oklahoma. These projects represent most of SPS's routine integrated resource plan for the next many years.

This is not for targeted economic development within New Mexico, but for general use to support SPS's projected electric load growth.

This is an attempt to inappropriately pressure the NM public regulation commission to have New Mexico ratepayers cover the cost of potentially overbuilding SPP's electric generating plants. If SPS's rosy load forecasts are wrong, these plants will be unnecessary but will still be on our electric bills for decades to come.

The PRC has established processes for evaluating utility proposals for building new electric capacity.

Those include getting sworn testimony from the utility regarding the basis for their plans, their

Rob Black

Cabinet Secretary

New Mexico Economic Development Department

1100 S St Francis Dr.

Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

On behalf of the New Mexico Chamber of Commerce, I am writing to express our strong support for Southwest Public Service Company's request for an Economic Development Certificate. This project represents the type of investment New Mexico needs to strengthen our economy, create jobs, and ensure reliable energy for communities across the state.

New Mexico is fortunate to have a vibrant energy sector, including oil and gas operations that contribute significantly to our state's economy. The revenues generated from this industry help fund our schools, improve public infrastructure, and support essential services in every part of the state. When we invest in the infrastructure that supports this industry, the benefits are not confined to one region — they ripple outward to rural towns, urban centers, and tribal communities alike.

Reliable, affordable power is the foundation for economic growth. The proposed generation investment will not only provide more dependable energy for businesses and residents, but it will also help reduce the risk of outages, enable the electrification of more operations, and promote lower emissions through increased efficiency. These are outcomes that align with both economic and environmental goals for the state.

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S St Francis Dr.
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

On behalf of the New Mexico Business Coalition (NMBC), I am writing to express our strong support for Southwest Public Service Company's (SPS) request for an Economic Development Certificate. NMBC is a New Mexico-based business organization that represents businesses of all sizes across the state. To learn more about us, visit our website: <https://nmbizcoalition.org>

This project represents the type of investment NM needs to strengthen our economy, create jobs, and ensure reliable energy for communities across the state. SPS is a subsidiary of Xcel Energy, a large utility that serves the Midwest and Mountain West. SPS is based in TX, but its service territory includes several counties in eastern NM. SPS is the primary electrical provider for the NM portion of the Permian Basin in Lea and Eddy counties.

New Mexico is fortunate to have a vibrant energy sector, including oil and gas operations that contribute significantly to our state's economy. The revenues generated from this industry help fund our schools, improve public infrastructure, and support essential services in every part of the state. When we invest in the infrastructure that supports this industry, the benefits are not confined to one

Development Project

On behalf of the Consumer Energy Alliance (CEA), I am writing to express our strong support for Southwestern Public Service Company's (SPS) application for a Certificate of Economic Development Project. This proposal comes at a pivotal time for New Mexico's economic growth, energy reliability, and environmental goals. As the Executive Director for the Southwest Region of CEA, I have had the opportunity to work closely with stakeholders across our state—including rural communities, tribal governments, economic development organizations, and industry partners—to understand the unique challenges and opportunities we face in meeting energy demand while fostering sustainable growth. The SPS application reflects both the foresight and the practical planning required to keep New Mexico competitive, resilient, and on track toward its clean energy ambitions.

Founded in 2006, CEA is a nonpartisan, nonprofit organization advocating for a balanced energy policy and responsible access to resources. CEA represents virtually every sector of the U.S. economy – from the iron and steel industry to truckers, airlines, agriculture, labor organizations, restaurants, chemical manufacturers, small businesses, and families across the nation – that are concerned about U.S. energy policies, energy security, and long-term price and supply stability.

Our members support a rational, all-of-the-above energy policy that utilizes all of our domestic natural resources – both traditional and renewable – while ensuring commonsense environmental protections are in place.

New Mexico's population and economic base are steadily growing, with notable expansions in energy-intensive industries, manufacturing, agriculture, and commercial sectors. These developments not only strengthen local tax bases and create jobs but also increase the demand for dependable and affordable energy. Our state's ability to attract new employers and support existing businesses is directly tied to

From: [Randall T. Phipps \(mtncan@msn.com\)](mailto:mtncan@msn.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 2:42:34 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

The SPS application does not result in additional economic development in New Mexico, but rather projects that SPS planned to build anyway. Certification for the 14 proposed SPS projects, 11 of which would be located in Texas or Oklahoma, would be outside the scope of what SB170 was intended to support and would set a dangerous precedent for utilities to sidestep the Public Regulation Commission's full and appropriate review of utility applications.

The significantly shorter time allowed for PRC review would also mean intervenors and the public would have little to no opportunity to analyze and participate in resource cases, and economic-development certification would put a thumb on the scale for cost-recovery consideration at the commission. Certification nearly guarantees SPS would be allowed cost recovery from New Mexico customers, whose rates would almost surely increase because of these projects. The PRC needs adequate time to review such a large portfolio of resources of varying technologies and should not have its authority or review time curtailed.

At least one of the projects under consideration would likely violate the New Mexico Energy Transition Act unless SPS is granted a waiver. The EDD shouldn't issue what amounts to a pre-approval at the PRC for a utility to skirt another New Mexico law.

The other regulated electric utilities reported that they plan to request this certification for electrical facilities to serve, for example, a business park or a master-planned community. But the SPS application is not for any one project. It is asking the Economic Development Department to determine that the resources SPS was planning to build anyway are all special economic-development projects for New Mexico -- even the ones in Texas or Oklahoma, because they might eventually supply power to New Mexico businesses.

Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Randall T. Phipps
36 Lovato Rd

Tijeras, NM 87059
mtncian@msn.com
(505) 281-1910

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Rebecca Juterbock \(rebeccajuterbock@gmail.com\)](mailto:rebeccajuterbock@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:39:55 PM

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Sincerely,

Rebecca Juterbock
1333 Highway 313

Algodones, NM 87001
rebeccajuterbock@gmail.com
(505) 771-0531

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Rebecca Kraimer \(rakraimer@gmail.com\)](mailto:rakraimer@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 1:02:12 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

Rebecca Kraimer
4500 Panorama Dr

Las Cruces, NM 88011
rakrainer@gmail.com
(575) 382-8054

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Rebecca Procter \(rprocter@msn.com\)](mailto:rprocter@msn.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:24:15 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Rebecca Procter
21 Aster Way

Santa Fe, NM 87508
rprocter@msn.com
(505) 231-4369

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S St Francis Dr.
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

Energy reliability and affordability are vital for the welfare and prosperity of all New Mexicans. I represent 30,000 residents in southeastern New Mexico in House District 55, and I write to encourage the support for the SPS' application for economic development certification, which would expand the energy capacity within southeastern New Mexico.

This is a most urgent concern, as the power limitations within the southeast have become a hinderance to economic growth. Our oil and gas industry, service providers, retailers, schools and other businesses are all drastically affected by the lack of power within this region. In the end, it is our families that suffer the consequences of this stifled economy.

The capacity expansions proposed by Xcel will provide the infrastructure needed to sustain growth, which would in turn enable job creation, and a trustworthy economy for our families. With reliable energy as a foundation, communities across the region can continue to grow and prosper.

I respectfully urge your department to certify these projects and move them forward on the expedited timeline. This would not only be a great benefit to the people of southeastern New Mexico, but to all New Mexicans.

Sincerely,

Representative Cathrynn Brown



State of New Mexico
House of Representatives
Santa Fe

ELAINE SENA CORTEZ

R - Lea
District 62

COMMITTEES:
Energy, Environment & Natural Resources
Health & Human Services
Enrolling & Engrossing B

P. O. Box 1785
Hobbs, NM 88241
Cell: (575) 390-5744
Website: Elaineform.com
E-mail: Elaine.SenaCortez@nmlegis.gov

August 22, 2025

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S. St. Francis Drive
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

As the State Representative for Hobbs and southeastern New Mexico, I am proud to represent a region that drives much of our state's economy. As both a small business owner and a professor, I see every day how reliable energy is essential to our success—whether it is keeping classrooms connected, ensuring local businesses can grow, or supporting the industries that provide jobs and opportunity.

In southeastern New Mexico, the demand for power has outpaced available infrastructure. This shortage slows economic development, delays the opening of new businesses, and even affects schools and government facilities that need reliable connections. At the same time, the oil and gas industry in our region generates billions in revenue for the state, funding education and vital programs that benefit every New Mexican. To keep that success going, we must ensure that infrastructure keeps pace with our needs.

The Economic Development Certificate process approved by the Legislature provides a state-led pathway to do just that. It ensures timely action, robust public engagement, and avoids unnecessary costs and delays. Advancing Southwest Public Service Company's application through this process will strengthen energy reliability across southeastern New Mexico, giving businesses, schools, and families the certainty they need to thrive.

Reliable power is the backbone of economic growth. By approving this application, New Mexico will not only support the oil and gas industry that sustains our schools and communities, but also encourage investment across every sector of our local economy.

For these reasons, I respectfully urge approval of this application so southeastern New Mexico can continue to fuel opportunity for our entire state.

Sincerely,

A handwritten signature in black ink that reads "Elaine Sena Cortez". The signature is written in a cursive, flowing style.

Elaine Sena Cortez
State Representative, District 62 (Hobbs, NM)



State of New Mexico
House of Representatives
Santa Fe

DAYAN HOCHMAN-VIGIL

MAJORITY WHIP

D – Bernalillo

District 15

8100 Wyoming Blvd. NE, Ste M4-336

Albuquerque, NM 87113

Mobile: (505) 948 - 2320

Email: dayan.hochman-vigil@nmlegis.gov

COMMITTEES:

Judiciary

Transportation, Public Works & Capital Improvements

Printing & Supplies

Rules & Order of Business

August 21, 2025

Rob Black

Cabinet Secretary

New Mexico Economic Development Department

1100 S St Francis Drive

Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

I am submitting this letter in support of Southwest Public Service Company's application for an Economic Development Certificate. Reliable and affordable energy is essential to the well-being of New Mexicans, and it is critical to our ability to meet the goals established under the Energy Transition Act.

Over the past several years, New Mexico has taken significant steps to address emissions and environmental quality, including the adoption of methane emissions reduction rules within the oil and gas sector. These policies reflect our state's commitment to cleaner air and healthier communities. Projects such as this one can complement those efforts by helping reduce emissions in southeastern New Mexico and across the broader region. This is particularly important in areas that have struggled to meet federal air quality standards. Supporting new energy development in a thoughtful and measured way provides a constructive path forward—improving reliability, reducing emissions, and aligning with the long-term goals set by the legislature.

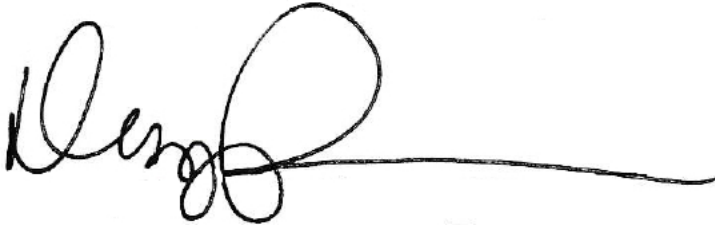
While the direct impact of this filing is regional, the area it affects, the Permian Basin, plays a significant role in our state's economy and environment. What happens there carries broad consequences for New Mexico, from energy markets to public health. By strengthening energy reliability and supporting cleaner resources in that region, we create benefits that extend well

beyond its boundaries. This is not just about one part of the state; it is about ensuring that New Mexico as a whole can continue to grow its advanced energy ecosystem, support responsible development, and safeguard the health of its people.

Approval of this certificate will reinforce our state's ability to provide dependable energy while also addressing emissions concerns in an area that has a far-reaching effect on our statewide progress. It will benefit families and small businesses by ensuring reliable service, and it will help communities that are most vulnerable to rising costs and environmental challenges.

For these reasons, I respectfully encourage the Economic Development Department to approve Southwest Public Service Company's application for an Economic Development Certificate. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, featuring a large, stylized 'D' and 'H' followed by a long horizontal line.

Dayan "Day" Hochman-Vigil
State Representative, District 15
Majority Whip, New Mexico House of Representatives



State of New Mexico
House of Representatives
Santa Fe

JONATHAN A. HENRY

R - Chaves, Eddy & Otero
District 54

August 22, 2025

COMMITTEES:

Energy, Environment & Natural Resources
Taxation & Revenue
Enrolling & Engrossing A

P.O. Box 1013
Artesia, NM 88210
Cell: (575) 921-4878

The Honorable Rob Black
Cabinet Secretary
New Mexico Economic Development Department
Joseph M. Montoya Building
1100 S. St. Francis Drive
Santa Fe, New Mexico 87505-4147

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black:

As the State Representative for Eddy and Lea Counties and the Mayor of Artesia, my governmental experiences have given me a broad perspective on how state, county, and local governments must work together to meet the needs of our citizens—and how delays in essential infrastructure can directly harm families, schools, businesses, and public facilities across our region.

Nowhere is the need for intergovernmental cooperation more evident than in the need for creating more reliable energy in southeastern New Mexico. In my own community and throughout the region, the lack of available power is holding back economic development. Businesses are delayed, government buildings wait for connections, and opportunities for growth are slowed because of the urgent demand for electricity that cannot be met quickly enough under the current process.

The Economic Development Certificate process approved by the Legislature provides a pathway to resolve these challenges. By advancing projects through this state-level process, we can ensure timely action, robust public engagement, and a fair system that avoids unnecessary delays and costs.

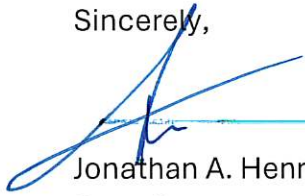
Southwest Public Service Company's (SPS) application for an Economic Development Certificate will help strengthen energy reliability across southeastern New Mexico. Few

Page 2

regions depend more heavily on the oil and gas industry than ours, and ensuring reliable infrastructure is not only about supporting that industry, but also about sustaining the families, schools, businesses and communities that rely on it every day.

For these reasons, I respectfully urge approval of SPS's application to put New Mexico on a stronger path toward reliability, opportunity, and community stability.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jonathan A. Henry', is written over a horizontal blue line.

Jonathan A. Henry
State Representative, District 54

From: [Rey Deveau \(devotaos@gmail.com\)](mailto:devotaos@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 4:42:44 AM

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Dear New Mexico Economic Development Department,

Another GOP effort to distort the truth and try to expedite their lies before they are called out. This has nothing to do with helping the people rather it and a; s aimed at exploiting them.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Rey Deveau
27 Cerrito Colorado Road
Valdez, NM 87580
devotaos@gmail.com
(575) 779-8989

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Robert Hoerlein \(rhoerlein@gmail.com\)](mailto:rhoerlein@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 6:59:34 PM

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Robert Hoerlein
3800 Academy Rd Ste B

Santa Fe, NM 87507
rhoerlein@gmail.com
(310) 443-6018

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Robert MacKenzie \(rb_mackenzie@icloud.com\)](mailto:rb_mackenzie@icloud.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 8:38:34 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Robert MacKenzie
10 Vista De La Vida

Santa Fe, NM 87506
rb_mackenzie@icloud.com
(650) 743-6552

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Robert Mccorkle \(frogman3030@gmail.com\)](mailto:frogman3030@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 7:18:51 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Robert Mccorkle
1130 Marilissa Ln

Las Cruces, NM 88005
frogman3030@gmail.com
(830) 460-0424

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Robert Taylor \(dr.bob.taylor@gmail.com\)](mailto:dr.bob.taylor@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 11:09:13 AM

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Dear New Mexico Economic Development Department,

loss of an entire portfolio of mostly out-of-state projects may be deleterious to serve NM interests.

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Sincerely,

Robert Taylor
529 New York Dr
Portales, NM 88130
dr.bob.taylor@gmail.com
(505) 259-7089

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Roberto Roibal \(rroibal@comcast.net\)](mailto:rroibal@comcast.net) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:48:36 PM

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Dear New Mexico Economic Development Department,

I cannot afford increased energy bills so that companies can make huge profits and destroy our environment

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Roberto Roibal
826 Pablina St
Santa Fe, NM 87505
rroibal@comcast.net
(505) 873-0599

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Ron Faich \(ronfaich@comcast.net\)](mailto:ronfaich@comcast.net) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 12:46:59 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Ron Faich
9400 Snow Heights Blvd NE

Albuquerque, NM 87112
ronfaich@comcast.net
(505) 296-0015

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Ron Mittan \(rgmittan@gmail.com\)](mailto:rgmittan@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:57:28 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Ron Mittan
5024 Sevilla Ave NW

Albuquerque, NM 87120
rgmittan@gmail.com
(505) 836-8625

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Ruth Ann Cooper \(raccings@comcast.net\)](mailto:raccings@comcast.net) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:15:46 PM

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Dear New Mexico Economic Development Department,

I support the concerns voiced by the Sierra Club.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Ruth Ann Cooper
1609 Veridian Dr SE
Rio Rancho, NM 87124
racsings@comcast.net
(812) 322-0516

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Sally Roberts \(sroberts@northwestern.edu\)](mailto:sroberts@northwestern.edu) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 11:10:48 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Sally Roberts
53 Avenida Frijoles

Santa Fe, NM 87507
sroberts@northwestern.edu
(505) 670-2830

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Sandra Almand \(sandra.almand@gmail.com\)](mailto:sandra.almand@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 5:14:29 AM

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Dear New Mexico Economic Development Department,

We need to carefully consider this application, not fast track it. Our communities depend on clean energy, air and water.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Sandra Almand
520 Los Ranchos Rd NW Apt 17
Los Ranchos, NM 87107
sandra.almand@gmail.com
(505) 639-3189

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Sarah Crawford \(scrawford0@gmail.com\)](mailto:scrawford0@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 10:13:11 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Sarah Crawford
1904 Juniper Dr

Alamogordo, NM 88310
scrawford0@gmail.com
(559) 312-0620

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Sarah Stout \(sarahclaudia.s@gmail.com\) Sent You a Personal Message](mailto:sarahclaudia.s@gmail.com)
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:27:19 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Sarah Stout
1317 Luana St

Santa Fe, NM 87505
sarahclaudia.s@gmail.com
(505) 424-1906

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August 21, 2025

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S. St. Francis Drive
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

I write to express my support for Southwest Public Service Company's application for an Economic Development Certificate. As a State Senator, a long-serving member of the Eunice School Board, and someone who has worked for decades in the construction industry supporting both energy operations and community infrastructure, I understand how essential reliable power is to the future of our region.

In southeastern New Mexico, we are seeing energy demand rise faster than ever before. Families, schools, small businesses, and industries of every kind depend on stable and affordable electricity. Without it, our ability to grow, diversify, and attract new opportunities is limited. Through my work, I see firsthand how closely tied reliable infrastructure is to both the success of oil and gas operations and to the vitality of other sectors of our economy. When energy supply is strong, it supports every part of our communities.

That is why the process we passed during the last legislative session is so important. It recognizes that New Mexico must modernize how projects are approved in order to meet rising demand and avoid delays that can create unnecessary costs or put communities at risk during peak seasons. The changes now in place will help get projects online more quickly, ensure that citizens still have a voice, and provide the certainty needed for both workforce stability and long-term growth.

Xcel Energy and its subsidiary, Southwest Public Service Company, have worked diligently to meet the needs of our region, but the challenge is only growing. Policymakers will need to continue addressing these issues in the years ahead, because the demand for energy is increasing faster than anyone could have imagined. This application is an important step in putting us on a path toward meeting those demands while laying the foundation for success and prosperity across southeastern New Mexico.

For these reasons, I respectfully urge approval of this application.

Sincerely,
David M. Gallegos
State Senator, District 41
Member, Eunice School Board



New Mexico State Senate
State Capitol
Santa Fe

COMMITTEES:

MEMBER:

- Finance
- Committees' Committee

SENATOR PAT WOODS

MINORITY WHIP

R-Curry, Harding, Quay & Union-7

4000 CR M.
Broadview, NM 88112

Home: (575) 357-8594
E-mail: pat.woods@nmlegis.gov

August 21, 2025

Secretary Rob Black
NM Economic Development Department
1100 S. St. Francis Drive
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

As a rancher from Broadview and a State Senator representing Curry and the surrounding counties, I have seen firsthand the growing demand for reliable energy across eastern New Mexico. Families, schools, and businesses depend on it every day, and without timely investments in infrastructure, we risk holding back the growth and stability our communities deserve.

In a recent Legislative Finance Committee meeting in Sunland Park, there was discussion about the future load requirements for the three Investor-Owned Utilities and the generation resources needed to meet them. Xcel Energy, in particular, is projected to experience the greatest load growth. This presents an excellent opportunity to utilize the Economic Development Certificate process, ensuring that new infrastructure is sited in a timely manner with a clear avenue for public engagement.

Southwestern Public Service Company has put forward projects in this application that will strengthen reliability across eastern New Mexico. This process, approved by the Legislature last session, will help us address urgent energy needs more quickly, avoid unnecessary delays and costs, and give our communities the certainty they need to plan for the future.

I respectfully urge approval of this application so that we can put New Mexico on a path toward greater energy reliability, economic opportunity, and community stability.

Sincerely,

Pat Woods

State Senator, District 7

From: [Shelley Mann-Lev \(shelleymannlev1@gmail.com\)](mailto:shelleymannlev1@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 4:03:37 PM

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Dear New Mexico Economic Development Department,

I oppose this certification.

I am writing to urge the Economic Development Department to deny Southwestern Public Service's application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Shelley Mann-Lev
2663 Via Caballero del Norte
Santa Fe, NM 87505
shelleymannlev1@gmail.com
(505) 946-8676

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Sherry Hulsey \(sherryhulsey1@gmail.com\)](mailto:sherryhulsey1@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 10:53:48 PM

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Dear New Mexico Economic Development Department,

To: Economic Development Department. REJECT SW PUBLIC SERVICE APPLICATION TO BYPASS VITAL PROCEDURES DESIGNED TO PROTECT NEW MEXICANS AND THEIR STATE! No Exemptions! Do not set up a precedent for other utilities to try to sneak around our laws. There are MANY good reasons for the PRC and other consumer and environmental groups to have time to research and review processes and facilities. Let SB170 do what it was intended to do -which was not to benefit out-of-state groups at the expense of our own citizens. Protect New Mexicans and New Mexico today and in the future. Stand Strong!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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because they might eventually supply power to New Mexico businesses.
Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Sherry Hulsey
3279 Solarridge St
Las Cruces, NM 88012
sherryhulsey1@gmail.com
(505) 526-4150

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.



August 21, 2025

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S St Francis Drive
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

The National Hispanic Energy Council (NHEC) was founded to raise awareness about the disproportionate energy burdens faced by Hispanic households. On average, Hispanic families pay 24% more of their income on energy costs compared to the national average. This reality makes it essential that energy policies and processes support affordability, reliability, and timely development of infrastructure that can lower costs and strengthen economic opportunity in our communities.

It is with that mission in mind that NHEC supports Southwestern Public Service Company's request for certification of economic development projects under Senate Bill 170. SPS, a subsidiary of Xcel Energy, has applied for certification of 14 wind, solar, battery storage, and natural gas projects designed to serve anticipated load growth, enhance reliability, and generate meaningful economic benefits for New Mexico.

From our perspective, the importance of this certification is about process and predictability. Hispanic families and small businesses, especially in rural areas, too often carry higher energy burdens. Delays in advancing needed projects lead to higher costs, missed employment opportunities, and uncertainty for local communities. A clearer, more efficient certification process will help ensure that critical projects can move forward in a timely way, while still maintaining meaningful opportunities for citizen and stakeholder engagement.

The benefits of this request go beyond infrastructure. Timely approval allows for stable, well-paying construction and operations jobs, many of which are filled by Hispanic workers. It also provides the capacity to meet the significant load growth expected in southeastern New Mexico, ensuring that businesses can expand and communities can thrive without compromising affordability.

Importantly, certification under SB 170 does not decide the merits of any individual project. Each project will still be subject to the appropriate oversight and review. Certification simply ensures



that New Mexico is prepared to meet future economic development opportunities with the reliable, affordable energy infrastructure needed to support them.

For these reasons, the National Hispanic Energy Council urges approval of SPS's request for certification of its proposed economic development projects. Doing so will help ensure that Hispanic families, small businesses, and workers are included in the benefits of a stronger and more reliable energy future.

Sincerely,

A handwritten signature in black ink that reads "Julio Fuentes". The signature is fluid and cursive, with the first name "Julio" and last name "Fuentes" clearly distinguishable.

Julio Fuentes
Chairman
National Hispanic Energy Council
Julio@fshcc.com
(561) 513-8096

8/21/2025

Rob Black
Cabinet Secretary
New Mexico Economic Development Department
1100 S St Francis Dr.
Santa Fe, NM 87505

Re: Support for Southwest Public Service Company's Application for Economic Development Certificate

Dear Secretary Black,

On behalf of Lea County State Bank we are writing in support of SPS' application for economic development certification of their proposed capacity expansions in southeastern New Mexico. Reliable, affordable power is essential to the success of our businesses and the long-term health of our communities, and this project will help meet that need.

Nowhere is this more urgent than in the southeast, where the oil and gas industry anchors our economy and drives opportunities for countless other businesses—from service providers and retailers to schools and training programs. Yet the lack of available power has become a serious constraint, limiting growth not only for energy producers but for the many small businesses and families that depend on them.

The capacity expansions proposed by Xcel will relieve these bottlenecks and provide the infrastructure needed to sustain growth. This is about more than megawatts on the grid; it is about enabling job creation, supporting workforce training, and ensuring New Mexico remains competitive in attracting new investment. With reliable energy as a foundation, communities across the region can continue to grow and diversify.

We respectfully urge your department to certify these projects and move them forward on the expedited PRC approval timeline. Doing so will directly benefit southeastern New Mexico and the broader state economy in a meaningful way.

Sincerely,



Alfonso Cisneros
SVP/Chief Lending Officer
Lea County State Bank
575-397-6630
alfonso.cisneros@lcsb.com

From: [Stacy Nelson \(seventhtask@yahoo.com\)](mailto:seventhtask@yahoo.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 6:56:10 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Stacy Nelson
74 Camino Don Fidel

Santa Fe, NM 87507
seventhtask@yahoo.com
(505) 660-9653

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Stephen Dent \(sddent@gmail.com\)](mailto:sddent@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 12:22:45 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

Stephen Dent
9 Crest Rd

Sandia Park, NM 87047
sddent@gmail.com
(505) 720-2914

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Stephen Schmidt \(ssdog@mac.com\)](mailto:ssdog@mac.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 9:30:32 PM

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Dear New Mexico Economic Development Department,

This request is an outrage and an offense to all New Mexicans. To allow more fossil fuel development while reducing the public input and granting exemptions to laws passed to protect us and incentivize our transition to renewables is unacceptable.

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Stephen Schmidt
21 Calle Debra
Santa Fe, NM 87507
ssdog@mac.com
(505) 473-0549

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Steve and Alicia Pruitt \(ppueblo2011@gmail.com\)](mailto:ppueblo2011@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 9:33:28 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Steve and Alicia Pruitt
13335 Chaco Cliff Trail SE

Albuquerque, NM 87123
ppueblo2011@gmail.com
(505) 252-7836

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Steve McSwain \(smcswain333@gmail.com\)](mailto:smcswain333@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 10:23:08 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Steve McSwain
PO Box 218

Placitas, NM 87043
smcswain333@gmail.com
(505) 259-7290

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Steven Barela \(evets53@aol.com\)](mailto:evets53@aol.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 7:13:53 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Steven Barela
137 Bob St

Santa Fe, NM 87501
evets53@aol.com
(505) 920-0604

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Sue Merrick \(smerrick@zianet.com\)](mailto:smerrick@zianet.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 2:20:30 PM

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Dear New Mexico Economic Development Department,

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Sincerely,

Sue Merrick
211 Happy Trl N

Las Cruces, NM 88005
smerrick@zianet.com
(575) 523-6257

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Sincerely,

Sue Roujansky
6 Sandy Ln
Placitas, NM 87043
roujan@unm.edu
(505) 620-9996

From: [Susan Russo \(tele4fun@gmail.com\)](mailto:tele4fun@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:55:21 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Susan Russo
8 Open Meadow Dr

Tijeras, NM 87059
tele4fun@gmail.com
(505) 286-0989

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Susan Selbin \(sselbin24@gmail.com\)](mailto:sselbin24@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:14:37 PM

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Dear New Mexico Economic Development Department,

Reject the SPS! NMANDAPOS;S money should be used for specific development projects in NEW MEXICO!

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Susan Selbin
505 San Carlos Ct SW
Albuquerque, NM 87104
sselbin24@gmail.com
(505) 274-8742

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [Suzanne Eiseman \(soozinm15@gmail.com\)](mailto:soozinm15@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 10:16:22 PM

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Sincerely,

Suzanne Eiseman
154 Camino Rayo Del Sol

Corrales, NM 87048
soozinm15@gmail.com
(505) 280-2395

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August 22, 2025

Re: Comments on SPS Application for Economic Development Certification (SB 170)

Submitted to: New Mexico Economic Development Department

Date: August 22, 2025

From: Southwest Energy Efficiency Project (SWEEP)

Dear Secretary Black and Department Staff,

The Southwest Energy Efficiency Project (SWEEP) appreciates the opportunity to comment on Southwestern Public Service Company's (SPS) request for certification of 12 projects as "economic development projects" under SB 170. SWEEP is a public interest nonprofit organization that has been advancing energy efficiency in the Southwest for the past 24 years. SWEEP has a strong interest in ensuring that new statutory tools are implemented as the Legislature intended and with clear benefits to New Mexico.

Summary of Position

SWEEP urges the Economic Develop Department ("EDD" or "Department") to deny certification of the entire SPS request. SB 170 tasks the Department with certifying projects only if they "will support reasonably anticipated economic development within the state," after public comment and within 60 days. Certified projects then proceed to an expedited PRC review timeline. The stated intention of this expedited timeline process is to "attract, enable the growth of and retain commercial and industrial businesses capable of enhancing the local and state economy [...]".

The SPS filing, by contrast, seeks certification of a broad, multi-resource portfolio driven by generalized load growth and economic claims, much of which is tied to speculative activity in the oil-and-gas sector and includes numerous projects outside New Mexico. The breadth, scope and complexity of the SPS proposal raise many issues beyond the purview of the Department, including substantial concerns about prudence, cost allocation and risks of cross-subsidization. These and other issues of the portfolio should be considered during standard fully litigated proceedings at the PRC.

I. The Framework Requires Reasonably Anticipated Load and Economic Development Projects

SB 170 directs EDD to determine, whether a proposed economic development project “will support reasonably anticipated economic development within the state” and to provide a public comment opportunity before issuing a certification letter. SB 170 also defines “economic development project” to include generation, storage, and transmission and distribution facilities (among others) that are “necessary to serve reasonably anticipated new load.”

Nothing in SB 170 authorizes blanket certification of a multi-year, multi-state portfolio simply because overall system load is projected to rise; the Department’s task is a New Mexico focused determination that the specific project(s) “will support” in-state economic development.

Certification under SB 170 should reduce New Mexico’s economic vulnerabilities, not deepen them. The SPS request relies on highly uncertain drivers of load growth and long-lived investments that could outlast the very demand they are meant to serve. Approving certification on this basis would expose the state and its ratepayers to significant risk if those forecasts do not materialize. By design, SB 170 is meant to support projects that demonstrably advance New Mexico’s economic development. Relying on speculative projections creates vulnerability for the state’s economy, utility customers, and the Department’s credibility.

II. SPS’s Request is Systemwide and Multi-State, Not Tied to Specific NM Site-Readiness

SPS asks the Department to certify 12 projects drawn from its recent RFP “Modeled Preferred Portfolio,” noting they are located in New Mexico, Texas, and Oklahoma. SPS justifies this by asserting it operates a single integrated system and that out-of-state facilities “contribute to serving the anticipated load growth in New Mexico.” This filing posture underscores that the request is about system capacity rather than clearly documented, site-specific readiness within New Mexico, what SB 170 asks the Department to evaluate.

III. Lack of Site-Specific New Mexico Benefits

While SPS points to existing certified economic development sites in Roswell, Hobbs, Lovington, and Clovis, it has not shown binding customer commitments or firm load at the project locations proposed in this application. Instead, the application rests on systemwide capacity planning and generalized industrial growth projections. SB 170

requires the Department to determine whether *specific projects* will support reasonably anticipated economic development **within the state**. Out-of-state projects, or in-state projects without demonstrated load commitments, do not satisfy this threshold.

IV. Speculative Load Projections and Inflated Economic Claims

SPS acknowledges that more than eighty percent of its projected load growth between 2026 and 2030 is tied to industrial electrification, with \$2–\$5 billion in related investment described by its own consultant as “order-of-magnitude” estimates rather than binding commitments. Such uncertainty does not meet SB 170’s requirement that certified projects be based on “reasonably anticipated” load (§62-6-26(F), NMSA 1978). Without credit-worthy agreements aligned to the life of the assets, New Mexico customers may be left supporting stranded capacity.

The accompanying economic benefit claims are similarly preliminary. SPS asserts that the portfolio will generate more than \$1 billion in direct benefits and billions more in industrial investment, yet it concedes that full multiplier and fiscal analyses are not yet available. The benefits picture is further skewed: an average of 376 temporary construction jobs for two to three years contrasts with only 8 to 11 long-term operations and maintenance positions. SB 170 requires certification to rest on industry-standard site-selection guidelines and a complete record, not preliminary estimates and generalized system forecasts.

Certification under SB 170 should reduce New Mexico’s economic vulnerabilities, not deepen them. Approving projects on the basis of speculative demand and inflated claims would create significant risk if those forecasts do not materialize. By design, SB 170 is intended to support projects with clear, verifiable benefits to New Mexico’s economy.

V. Incomplete Record for Certification

SPS explicitly states that comprehensive economic modeling and fiscal impact analyses will be provided at a later stage. Certifying projects now, on the basis of a preliminary record, would short-circuit the Department’s responsibility under SB 170. The statute directs the Department to certify only when projects demonstrably support New Mexico’s economic development using industry-standard site-selection criteria. Without a complete, auditable record, that determination cannot be made.

EDD should deny certification because SPS’s request: (1) improperly includes out-of-state projects, (2) seeks portfolio-level pre-approval rather than project-specific review, (3) compresses PRC oversight on an incomplete record, (4) relies on speculative and concentrated forecasts, and (5) fails to demonstrate site-specific New

Mexico economic development benefits. Denial preserves the statute's intent: ensuring SB 170 is a tool for targeted, verifiable New Mexico projects, not a shortcut for broad utility resource planning.

VI. Recommendations

SB-170 is intended to align utility investment with New Mexico's economic development goals. To succeed, the statute must be applied rigorously and responsibly. SPS's current application, resting on speculative demand, preliminary economic analysis, and out-of-state siting without a clear New Mexico nexus, does not meet this threshold. The Department should, therefore, deny certification. Denial does not preclude SPS from seeking PRC approval and cost recovery for New Mexico projects through the standard CPCN, rate case and other PRC proceedings and processes; it simply avoids transforming SB 170's targeted certification into a de-facto portfolio-level pre-approval mechanism.

SWEEP appreciates the opportunity to provide public comment and thanks the Department for its consideration.

Sincerely,

Alex Eubanks
New Mexico Representative
Southwest Energy Efficiency Project

Courtney Fieldman
Utility Program Director
Southwest Energy Efficiency Project

Ramón Alatorre
Utility Program Senior Manager
Southwest Energy Efficiency Project

August 22, 2025

Subject: Support for SPS's Economic Development Certification Request

Dear New Mexico Economic Development Department,

I am Martina Sittler, Vice President of Engineering & Construction at Targa Northern Delaware ("Targa"). I write to strongly endorse Southwestern Public Service Company's (SPS) Request for Economic Development Certification under Senate Bill 170. Targa values this opportunity to support a process that delivers critical energy resources to fuel New Mexico's economic growth. We applaud Governor Michelle Lujan Grisham's leadership in advancing such impactful initiatives.

Targa, a leading midstream pipeline services provider and one of North America's largest independent midstream infrastructure companies, operates a natural gas gathering system in Lea and Eddy Counties. To sustain and expand our operations, Targa requires reliable, scalable power generation to support both current demands and future investments in New Mexico.

Certifying SPS's proposed 14 wind, solar, thermal, and battery storage systems is vital for timely development to drive economic growth. These resources are a critical first step, as New Mexico's expanding economy will require additional generation and infrastructure to meet rising energy needs.

Targa's commitment to electrification in oil and gas operations highlights the need for robust grid power. Since 2015, we have invested heavily in electric compression, deploying 140,600 horsepower at new gas plants and 28,000 horsepower in gathering operations in 2023 alone. SPS's proposed resources are essential to advancing these efforts, aligning with New Mexico's environmental goals.

We support streamlining New Mexico Public Regulation Commission processes, including Integrated Resource Plans, Renewable Portfolio Standards, and Certificates of Convenience and Necessity (CCNs). Certifying SPS's Request reduces CCN processing from 15 months to approximately 6 months (with a possible three-month extension), enhancing efficiency amid supply chain and cost challenges.

Senate Bill 170's safeguards ensure certification supports reasonable growth, capped at 10% of SPS's annual power demand. While enabling timely cost recovery, all costs remain subject to rigorous review in SPS's next rate case, maintaining stakeholder input and Commission oversight.

Thank you for considering Targa's support. I am available to discuss further or address any questions. Please contact me to arrange a meeting.

Sincerely,



Martina Sittler
Vice President, Engineering & Construction
Targa Northern Delaware LLC

From: [Theresa Hadden-Martinez \(hadden@expertiva.com\)](mailto:hadden@expertiva.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:31:19 PM

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Dear New Mexico Economic Development Department,

Our natural resources are limited. We cannot sacrifice them for some outsider wanting to make money off the backs of New Mexico's citizens. We have access to clean, green energy. Why should we have to pay for dirty products from Texas and Oklahoma? The PRC needs to stand up for New Mexico

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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Sincerely,

Theresa Hadden-Martinez
862 Foraker Rd Se
Rio Rancho, NM 87124
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(505) 620-8940

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To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 7:45:03 PM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

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Sincerely,

Thomas Gorman
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(505) 699-5042

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350NM Comments on
SPS Request for Economic Development Certification

August 22, 2025

I respectfully offer the following comments on the request by Southwestern Public Service submitted on June 20, 2025 for economic development certification of fourteen proposed new electric power generation projects. I am commenting on behalf of 350 New Mexico, the New Mexico chapter of 350.org, an international grassroots organization building a global movement to fight climate change. Our chapter was founded in 2011 to seek an urgent and just transition of New Mexico's energy economy away from fossil fuels to 100% clean renewable energy, in time to prevent global warming of 1.5-2.0°C.

My credentials include a BA from Harvard University, an MBA from Stanford Business School, and a PhD in International Business from George Washington University, and a fifty-year career in public policy related to energy and economic development. I have worked on utility regulation issues in NM for almost 20 years and have testified before the NM Public Regulation Commission as an expert witness.

The SPS application for certification of 14 new power plants is a poor fit for SB170 certification.

As demonstrated in these comments, the load forecasts that SPS is using to argue that these generating plants should be deemed "economic development projects" and for which they are seeking economic development certification under SB170 (2025) are in fact not based on "**reasonably anticipated** economic development within the state" (per Sec. 3.F) or "**reasonably anticipated** new load" (per Sec. G(1)) and are therefore ineligible for such designation.

There is tremendous uncertainty surrounding the underlying load forecasts and capacity needs identified by SPS, in particular the “electrification scenario” that anticipates continued substantial long-term growth of the oil and gas industry and electrification of new and existing oil and gas operations in their service territory (the New Mexico side of the Permian Basin). EDD certification pursuant to SB170 could be a powerful tool to support targeted economic development projects in the state, but it should not be abused by SPS to give economic development weight before the NM Public Regulation Commission for the utility’s entire near-term capacity expansion plan based on speculative load forecasts that create significant risks for ratepayers. At a minimum, EDD is required by statute to judge projects based on industry standard guidelines for site selection for each and every power plant in the SPS application and to determine their merits as economic development projects as opposed to utility business as usual.

Because SPS has not adequately demonstrated that these projects are needed to meet reasonably anticipated economic development or load, they should not be certified and SPS should not be authorized by EDD to garner the benefits SPS would receive from certification, including requiring the PRC to consider economic development benefits when reviewing projects, providing an accelerated timeline, and providing access to economic development funding.

SPS Load Forecast is based on unreasonable inputs and assumptions

SPS is projecting unprecedented near-term load growth on its system driving a need for additional cost-effective capacity and energy resources. The utility forecasts its summer accredited capacity need to grow from 656 MW in 2027 to 2,925 MW in 2030 and winter capacity need to grow even more substantially from 469 MW in 2027 to 3,338 MW in 2030. The

projects in the Request for Certification represent projects bid into SPS's 2024 All-Source Request for Proposals to be constructed and come on-line within the next six year to serve this highly speculative load.

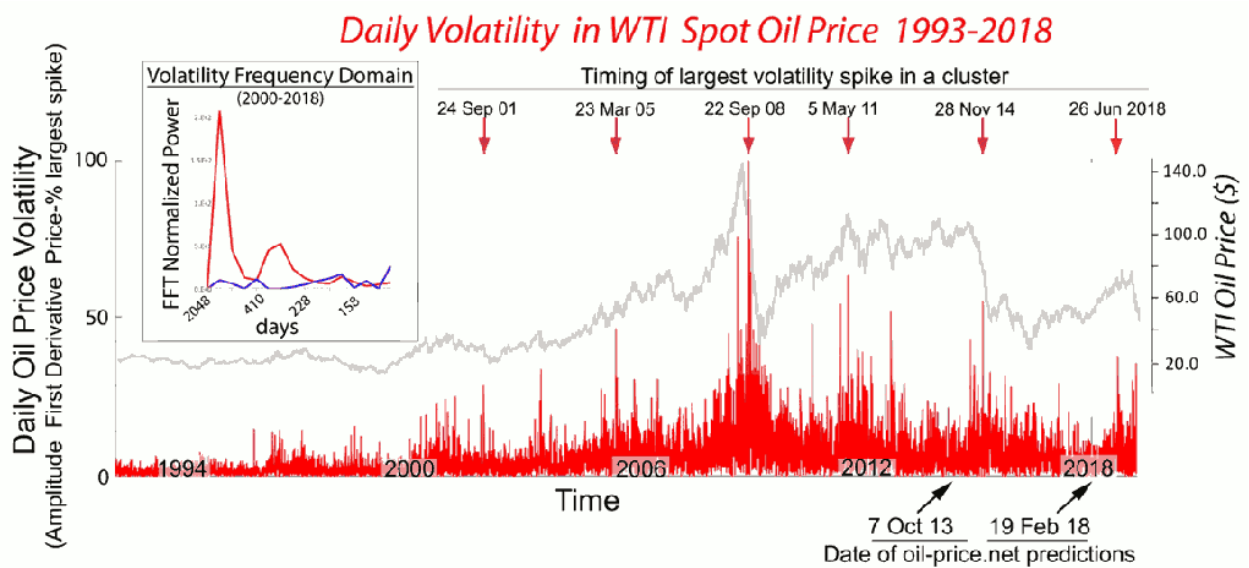
In fact, SPS's currently operational 2023 Integrated Resource Plan (IRP) stated that load has been consistently declining in the SPS territory: "Each [new 2023 scenario] forecast shows growth over the Planning Period **in contrast to the -2.8% historical annual average load decline and -1.0% historical annual average energy decline over the 10 years ending 2022.**"¹ [emphasis added]

In the SPS IRP's conservative Financial Forecast, "SPS projects its electric firm obligation load (firm retail and firm wholesale requirements customers) to increase at a compound annual growth rate of 1.0% or an average of 67 MW per year through the Planning Period." In its high growth Electrification Forecast, which underlies their Request for Certification at issue, firm load would grow at an average rate of 2.1% through the Planning Period, with **annual growth of 5.1% from 2024 to 2036** and, due to declining oil and gas activity thereafter, a -2.7% rate from 2036 to 2043." [emphasis added] This can be seen in Figure 4F.1 from the SPS IRP shown below. In effect, the economic development to be served by the projects seeking certification, which represent long-term sunk costs for ratepayers, will be short-term and temporary at best and do not represent sustainable economic development, a bedrock principle of the state's strategic economic development plan.

Oil price and production assumptions behind load forecast are contradicted by history and current trends and are not "reasonably anticipated"

¹ 2023 IRP at 63.

SPS bases its load and capacity need forecast in part on a 2023 analysis prepared by S&P Global Commodity Insights Upstream Consulting Group.² The oil price and production assumptions behind these forecast capacity needs are contained in the RFP Appendix D.³ Oil prices are forecast for 2025 at \$70.11 and rise steadily reaching \$112.20 in 2043. These assumptions are simply not grounded in historical trends that show significant price fluctuations (see chart below) and current events that indicate production increases, weak demand, and falling prices.



Source: Energy Matters; accessed at <https://euanmearns.com/waking-into-our-new-volatile-age-of-oil-prices/>

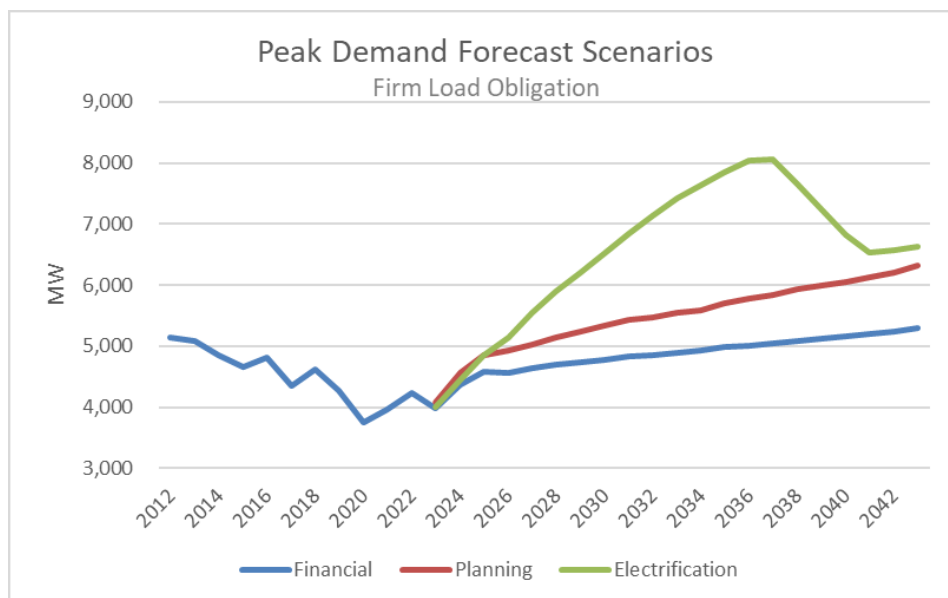
As often as there have been periods of suppressed global production leading to higher prices due to geopolitical forces, we have also seen repeated periods of increased production or suppressed demand and lower prices. As was recently announced, by OPEC+ producers, especially Saudi Arabia, are now planning to increase production which could significantly

² S&P Global, Electrifying the Permian Basin—Prepared for ERCOT Planning Committee, accessed at <https://www.ercot.com/files/docs/2023/03/17/Presentation%20to%20ERCOT%20planning.pdf> (March 22, 2023).

³ 2024 RFP at 2426, Appendix D, Table D-8.

increase supplies and lower prices.⁴ Saudi Arabia “can produce oil at very low cost — \$3.19 a barrel on average,”⁵ whereas the average breakeven production price for existing wells in the Permian Delaware is \$31 a barrel and \$64 to drill new wells.⁶ In addition to declining well productivity, Permian operators now also face renewed competition from the Middle East.

Adding further uncertainty, while SPS forecasts oil production to grow through 2027 but then begin to decline slowly throughout the rest of the planning period, they forecast their peak electric demand to continue to increase through 2037 as shown in Figure 4.F.1.



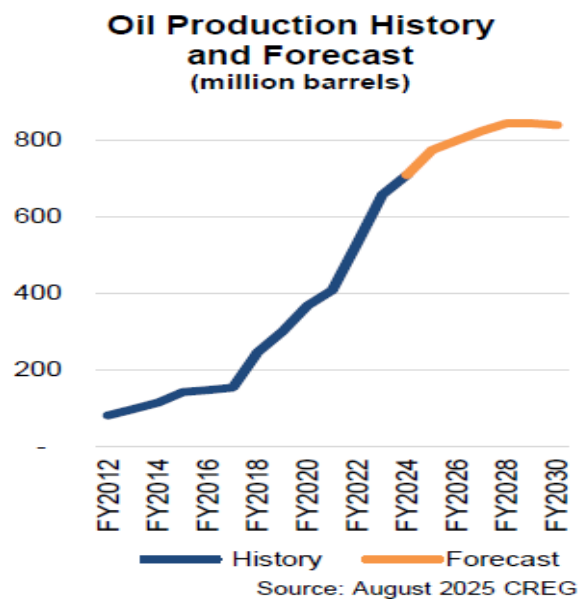
Declining future oil production undermines SPS load growth claims

⁴⁴ OPEC Plus Will Increase Oil Output, August 3, 2025; accessed at <https://www.nytimes.com/2025/08/03/business/opec-plus-oil-output.html>

⁵ Stanley Reed, *Saudia Arabia Eyes a Future Beyond Oil*, accessed at <https://www.nytimes.com/2024/05/29/business/saudi-arabia-renewable-energy-solar-wind.html> (May 29, 2024).

⁶ Dallas Fed Energy Survey for Q1 2024, accessed at <https://www.dallasfed.org/research/surveys/des/2024/2401#tab-questions>.

Official NM state revenue and investment forecasts show NM Permian production to decline slightly later than SPS, but they also show a much steeper rate of decline. This difference highlights the significant uncertainty underlying the capacity needs identified in the load forecast. For example, the oil and gas production forecast contained in the August 2025 LFC Consensus Revenue Estimate below shows NM oil production beginning to decline in FY 28.⁷

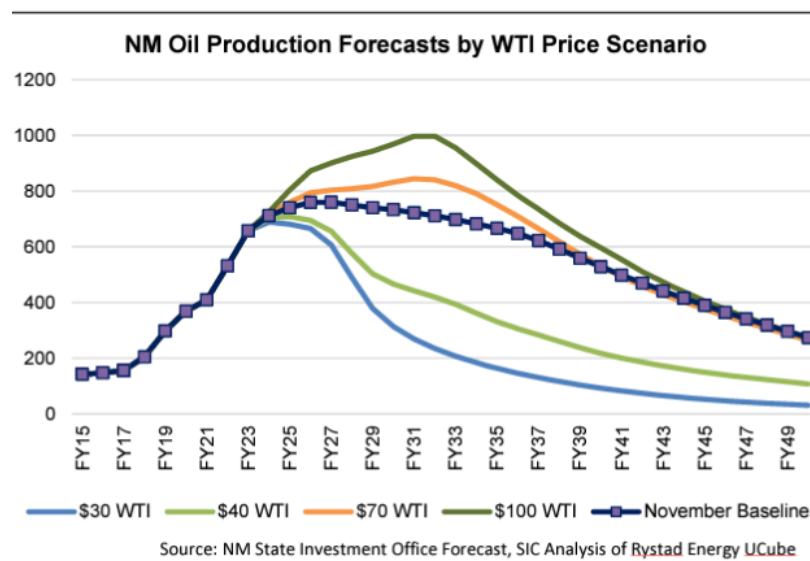


The NM State Investment Council (SIC) forecasts declining oil production beginning in 2027 and continuing into the future. The decline is steep (see figure below).⁸ According to the SIC, “[d]espite expected growth in the short- to medium-term, the estimated remaining years of drilling at pace on top tier acreage suggests production declines are expected by the early

⁷ New Mexico Legislative Financial Council, General Fund Consensus Revenue Estimate, p. 5 accessed at <https://www.nmlegis.gov/handouts/ALFC%20081925%20Item%201%20General%20Fund%20Consensus%20Revenue%20Estimate.pdf>.

⁸ Permanent Fund Inflows and Pacing Data, Estimates and Scenarios, (Data may be accessed by contacting the NM State Investment Council). (March 2024).

2030s.”⁹ The SIC foresees only “between 10-15 remaining years of drilling at the current pace on [the best] acreage in the Delaware Basin.”¹⁰ This spells trouble for overall production as “[t]otal New Mexico production will fall when fewer new wells are spudded and the increased production from new completions no longer offsets the decline rate of wells”¹¹ Lower rates of new drilling and reduced production will lead to reduced industry operations and evaporating load.



The State forecasts are corroborated by a recent assessment from the International Energy Agency (EIA) which forecasts a global oil demand peak by 2030.¹² “While we expect growth in oil consumption in 2024 (1.2 mb/d) and 2025 (1.1 mb/d) to remain robust by historical standards,

⁹ SIC Meeting Materials at 61. (Data may be accessed by contacting the NM State Investment Council). (March 2024).

¹⁰ *Id.*

¹¹ *Id.*

¹² Toril Bosoni and Ciaran Healy, *Oil Demand Growing at a Slower Pace as Post-Covid Rebound Runs Its Course*, accessed at <https://www.iea.org/commentaries/oil-demand-growing-at-a-slower-pace-as-post-covid-rebound-runs-its-course> (April 12, 2024).

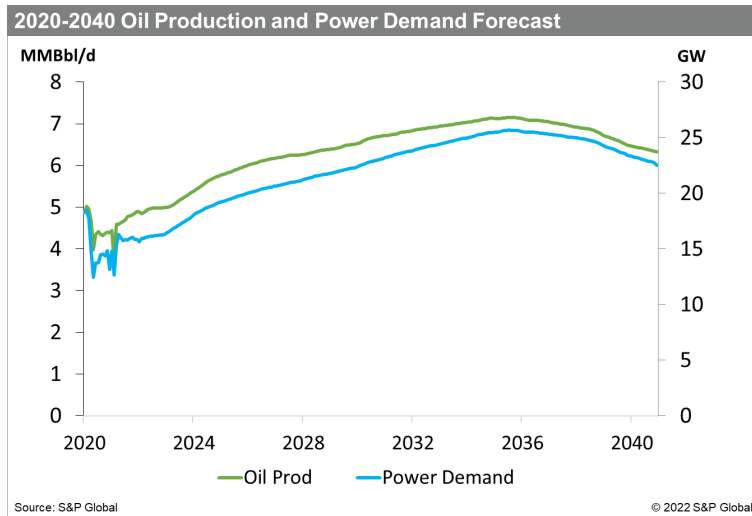
structural factors will lead to a gradual easing of oil demand growth over the rest of this decade. Continued rapid gains in the market share of EVs, particularly in China; steady improvements in vehicle fuel economies; and, notably, efforts by Middle Eastern economies, especially Saudi Arabia, to reduce the quantity of oil used in power generation are together expected to generate an overall peak in demand by the turn of the decade."¹³ These official forecasts are at odds with SPS's load forecast and cast serious doubt on their new load is reasonably anticipated or that the projects for which they seek certification will be needed.

SPS forecast relies on self-interested claims from Permian oil companies

Further, the data SPS uses to forecast load and determine capacity needs is biased in favor of the oil and gas industry. S&P Global relied heavily on major Permian producers, referred to as "sponsor companies", for study inputs. These producers included Exxon, Conoco-Phillips, Chevron, Devon, Pioneer, and Diamondback. The authors asked these companies for validation of S&P's production forecasts, the [companies'] future electric power requirements, and translation of those requirements into load forecasts.¹⁴ Note the stark contrast between the industry-based production forecast shown below from the S&P report and NM's official state forecasts.

¹³ *Id.*

¹⁴ *Id.* at 8.



S&P also highlighted major challenges to rapid electrification of oil and gas operations such as “[a]ccess to electrical grid service continu[ing] to materially lag demand, especially in the Delaware Basin, where substantial growth is expected”.¹⁵ Importantly, S&P notes that the “[c]urrent gap in grid access for traditional oil and gas operations is significant,”¹⁶ and “the pace of electrification needs to increase three to four-fold.”¹⁷ This adds additional uncertainty to SPS’s forecast of near-term capacity needs. The challenges facing transmission build-out are well known and electrifying oil and gas operations could be a much slower, longer-term proposition than that contemplated in SPS’s IRP and RFP, undermining the case for the power projects and their economic development project certification.

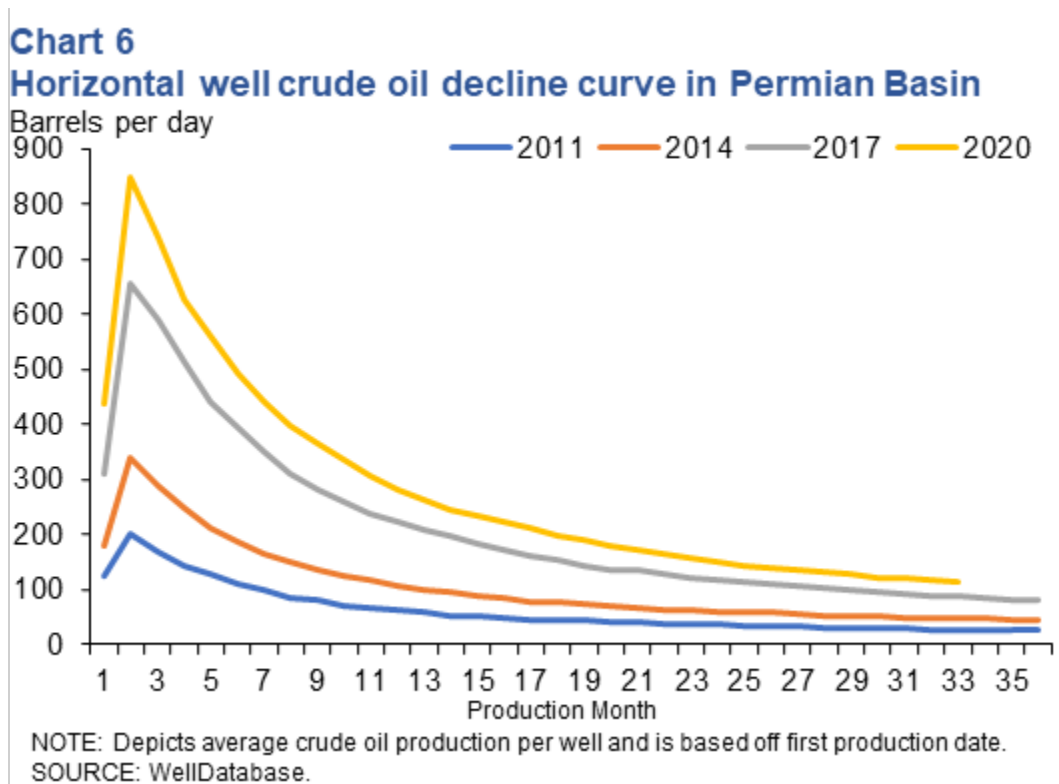
Finally, yet more uncertainty about future NM Permian oil production stems from the rapid production decline curves seen in tight oil formations historically throughout the country. Fracked wells produce at the highest levels immediately after a well is completed and then production typically fall off precipitously within several months and continues to do so. While

¹⁵ *Id.* at 4.

¹⁶ *Id.* at 18.

¹⁷ *Id.* at 30.

the S&P study references large estimates of total recoverable resources, it ignores the production profile trends in the NM Permian and their implications for future production. The Dallas Federal Reserve monitors decline curves, and Chart 6 below shows their most recent data on this phenomenon.¹⁸ While initial production has climbed among Permian wells, steep declines are still evident. And, as the SIC noted above, the “top-tier” or best acreage available for drilling in the NM Permian is running out. Re-fracked wells and the best remaining new well sites are unlikely to be sufficient for realization of a sustained longer-term growth scenario.



Art Berman, a respected authority on shale production, noted recently that “shale gas plays have reached an apparent peak and may be starting to decline ... Shale gas plays are

¹⁸ See Federal Reserve Bank of Dallas, Permian Basin, at <https://www.dallasfed.org/research/energy11/permian>, last accessed June 11, 2024.

beginning to look like a graveyard. The once world-class Barnett and Fayetteville are no longer included in discussions of U.S. shale plays. The Utica looks like it is headed for the same zombie status.”¹⁹

More current trends introduce yet more uncertainty into SPS’s load forecasts and the long-term viability of the projects for which it is seeking certification. Nationwide, electricity prices are rising due to higher costs of infrastructure. At the same time, the regulatory environment is changing rapidly, and the federal government is working hard to eliminate EPA and Department of the Interior requirements for oil and gas companies to reduce greenhouse emissions from methane leaks and venting and fossil fuel combustion for equipment like compressors. These factors create tremendous uncertainty about the prospects for demand for electrification from oil and gas companies. In the absence of government rules and in the face of higher electricity prices, it is easy to envision a future where market forces drive the industry to abandon electrification and return to its longstanding practices of fossil fuel driven operations.

Conclusion

In conclusion, SPS’s approach to load forecasting and recent trends make their claims that the 14 electric power generation projects are needed for economic development to meet new load anything but reasonably anticipated. Their request should be denied.

Respectfully submitted by:



¹⁹ “Draining America First – The Beginning of the End for Shale Gas”, accessed at <https://www.artberman.com/blog/draining-america-first-the-beginning-of-the-end-for-shale-gas/> (January 23, 2024).

THOMAS O. SINGER, PhD
350NM
505-231-1070
tosadvisors@yahoo.com

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Sincerely,

Timothy Vellinga
43 Cerro Blanco Rd

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vellinga77@me.com
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Tony Gurule
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Traci Garner
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Sincerely,

Uphoria Blackham
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I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

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The SPS application does not result in additional economic development in New Mexico, but rather projects that SPS planned to build anyway. Certification for the 14 proposed SPS projects, 11 of which would be located in Texas or Oklahoma, would be outside the scope of what SB170 was intended to support and would set a dangerous precedent for utilities to sidestep the Public Regulation Commission's full and appropriate review of utility applications.

The significantly shorter time allowed for PRC review would also mean intervenors and the public would have little to no opportunity to analyze and participate in resource cases, and economic-development certification would put a thumb on the scale for cost-recovery consideration at the commission. Certification nearly guarantees SPS would be allowed cost recovery from New Mexico customers, whose rates would almost surely increase because of these projects. The PRC needs adequate time to review such a large portfolio of resources of varying technologies and should not have its authority or review time curtailed.

At least one of the projects under consideration would likely violate the New Mexico Energy Transition Act unless SPS is granted a waiver. The EDD shouldn't issue what amounts to a pre-approval at the PRC for a utility to skirt another New Mexico law.

The other regulated electric utilities reported that they plan to request this certification for electrical facilities to serve, for example, a business park or a master-planned community. But the SPS application is not for any one project. It is asking the Economic Development Department to determine that the resources SPS was planning to build anyway are all special economic-development projects for New Mexico -- even the ones in Texas or Oklahoma, because they might eventually supply power to New Mexico businesses.

Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

Val Talento
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Albuquerque, NM 87102
vetalento@yahoo.com
(505) 243-8058

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

**Walter Gerstle's Public Comment on SPS's Application to the Economic Development
Department for Certification of Their New Generation Resources**

submitted Aug 20, 2025

Southwestern Public Service Company (SPS) is asking the New Mexico Economic Development Department (EDD) for a certificate to expedite the construction of five gigawatts of electrical power generation. This application depends upon the new law SB170, which was passed in the 2025 regular legislative session to enhance economic development in New Mexico.

This request for certification is not an appropriate use of SB170. The majority of the new power would be for new energy resources located in Texas and Oklahoma. Two gigawatts would be new natural gas generation, which would add to greenhouse gas emissions and exacerbate the worsening the climate crisis.

The load application of this new power is vague. It seems that the new power would be used primarily for oil and gas extraction in southeastern New Mexico. Senate Bill 170 is intended to facilitate site readiness for new economic development projects in New Mexico. It allows a utility to ask the Economic Development Department to certify a project as contributing substantively to "reasonably expected economic development". The legislation was presented to the public and to legislators as enabling faster development of electricity resources for places like industrial parks and rapidly growing communities.

The EDD should not certify this huge request for new energy development. Instead, SPS should apply to the Public Regulation Commission through the normal processes for new power generation. Overbuilding power generation in the vague hope of future load growth is unwise and would burden ratepayers unduly.

I ask the EDD to deny this request for an energy development certificate.

Sincerely,

A handwritten signature in black ink that reads "Walter Gerstle". The signature is written in a cursive, slightly slanted style.

Walter Gerstle, PhD
1709 Neat Lane SW
Albuquerque, NM 87105

Email: gerstle@unm.edu

From: [William Kipnis \(William.Kipnis@gmail.com\)](mailto:William.Kipnis@gmail.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Friday, August 22, 2025 9:29:48 AM

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Dear New Mexico Economic Development Department,

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

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The other regulated electric utilities reported that they plan to request this certification for electrical facilities to serve, for example, a business park or a master-planned community. But the SPS application is not for any one project. It is asking the Economic Development Department to determine that the resources SPS was planning to build anyway are all special economic-development projects for New Mexico -- even the ones in Texas or Oklahoma, because they might eventually supply power to New Mexico businesses.

Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

William Kipnis
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This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

From: [William Williams \(pianowww@aol.com\)](mailto:pianowww@aol.com) Sent You a Personal Message
To: [constituent.services, EDD](#)
Subject: [EXTERNAL] Please REJECT SPS application for expedited approval of out-of-state resources
Date: Thursday, August 21, 2025 8:13:16 PM

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Dear New Mexico Economic Development Department,

Have we learned nothing?

I am writing to urge the Economic Development Department to deny the Southwestern Public Service application for expedited review and approval at the Public Regulation Commission. The site-readiness legislation that passed in the last New Mexico legislative session is meant to support specific developments in New Mexico, not an entire portfolio of mostly out-of-state projects.

The special treatment that SB170 confers upon utility infrastructure was intended for those utility investments needed to deliver electric service to a specific location or area within New Mexico that is designated and prepared for the purpose of attracting and facilitating economic development and growth.

The SPS application does not result in additional economic development in New Mexico, but rather projects that SPS planned to build anyway. Certification for the 14 proposed SPS projects, 11 of which would be located in Texas or Oklahoma, would be outside the scope of what SB170 was intended to support and would set a dangerous precedent for utilities to sidestep the Public Regulation Commission's full and appropriate review of utility applications.

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At least one of the projects under consideration would likely violate the New Mexico Energy Transition Act unless SPS is granted a waiver. The EDD should not issue what amounts to a pre-approval at the PRC for a utility to skirt another New Mexico law.

The other regulated electric utilities reported that they plan to request this certification for electrical facilities to serve, for example, a business park or a master-planned community. But the SPS application is not for any one project. It is asking the Economic Development Department to determine that the resources SPS was planning to build anyway are all special economic-development projects for New Mexico -- even the ones in Texas or Oklahoma, because they might eventually supply power to New Mexico businesses.

Please deny this application that is clearly outside the intent of SB170 and would restrict the Public Regulation Commission's authority and ability to thoroughly vet the cost-effectiveness, benefit and legality of the SPS projects for New Mexico customers.

Sincerely,

William Williams
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(505) 917-9855

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Ramona Blaber at Sierra Club at ramona.blaber@sierraclub.org or (415) 977-5500.

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307 West 200 South
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August 22, 2025

Secretary Rob Black
New Mexico Economic Development Department
1100 S St. Francis Drive
Santa Fe, NM 87505

Dear Secretary Black:

Western Resource Advocates (WRA), a regional nonprofit conservation organization that is dedicated to protecting the land, air and water resources of the Interior West of the United States, including New Mexico, submits this letter as public comment in opposition to Southwestern Public Service Company (SPS)'s June 20th, 2025 application to the Economic Development Department (EDD) for certification of 14 electricity generation projects as economic development projects under 2025 New Mexico Senate Bill 170 (SB 170).

EDD should reject SPS's application, and not certify the 14 projects as economic development projects.

SB 170 was designed to expedite site readiness for specific economic development projects within New Mexico¹, not to provide a blanket certification for an electric utility's proposed new generation resource portfolio. However, in this application, SPS has requested that EDD certify nearly all (14 of 16) of the resources selected through its most recent Request for Proposals² as economic development projects. Doing so would set a precedent that is contrary to the intent of SB 170.

SB 170 allows a utility to ask EDD to certify a project as contributing substantively to "reasonably expected economic development". The legislation was presented to the public and to legislators as enabling faster build-out of electric infrastructure to support developments like industrial and business parks and rapidly-growing communities. In fact, the Legislative Finance Committee's fiscal impact report on SB 170 says that the legislation "is aimed at increasing economic development by giving utilities greater certainty they will be able to recover costs from pre-deploying infrastructure to economic development sites."³ In addition, the fiscal impact report for the companion bill to SB 170, 2025 SB 169 (which creates the site readiness fund that will support these economic development projects) defines the purposes of this fund as being "for the

¹"The economic development department shall certify, using industry standard guidelines for site selection, whether the economic development project will support reasonably anticipated economic development within the state." NMSA 1978 62-6-26(F).

² NMPRC Case No. 23-00073-UT, *Final Report of the Independent Monitor Submitted to the New Mexico Public Regulation Commission in the Matter of Southwestern Public Service Company's 2023 Integrated Resource Plan for New Mexico* (July 17, 2025).

³ 2025 SB 170 Fiscal Impact Report, p. 2. <https://www.nmlegis.gov/Sessions/25%20Regular/firs/SB0170.PDF>

purpose of identifying, assessing, and preparing sites for business development.”⁴ The language of the legislation – and thus the statute that EDD must rely upon to evaluate SPS’s application – expressly requires the use of “industry standard guidelines for site selection.” Clearly, the special treatment that SB 170 confers upon utility infrastructure was intended for those utility investments that are needed to deliver electric service to a specific location or area within New Mexico that is specifically designated and prepared for the purpose of attracting and facilitating economic development and growth.

Instead of certifying projects that would contribute directly and specifically to attracting and retaining businesses at New Mexico sites, approving SPS’s application would create a presumption that any utility’s regular resource procurements are automatically economic development adders, rather than part of the utility’s obligation to serve both new and existing customers in its service area. New Mexico’s other regulated utilities understand SB 170 within its original intent. In responses to a bench request from Public Regulation Commission Chairman Aguilera, both Public Service Company of New Mexico (PNM) and El Paso Electric (EPE) reported that that they plan to request “economic development project” certification for electrical facilities to serve, for example, a business park or a master-planned community.⁵ SPS’s application is an outlier which attempts to take advantage of legislation meant to apply in specific circumstances and use it to cover their general, regular build-out of system resources.

SPS’s proposed certification projects are system resources that SPS wants to bring online to do much more than serve “new” – or even incremental⁶ – load growth in New Mexico. Analysis of SPS’s resource acquisition RFP and its associated selected bids, provided by a PRC-approved third-party Independent Monitor, shows that the proposed certification projects are also required to meet the winter planning reserve margin for the Southwest Power Pool (SPP), the regional transmission organization (RTO) which SPS participates in.⁷ The winter planning reserve margin is a reliability requirement established by SPP and approved by the Federal Energy Regulation Commission. It is intended to benefit the entire RTO (which, in the case of SPP, extends deep into the Midwest). SPS’s proposal for new generation resources, including all the projects in this application for certification by EDD, is as large as it is in part to account for the very high winter planning reserve margins required by SPP. SPS was forced to run their models more than once to select larger, more expensive bids that would meet this regional reliability requirement.⁸ It would be inappropriate for EDD to certify projects across all of SPS’s service territory which were specifically chosen, not for their ability to spur New Mexico’s economic development, but in response to the external pressure of meeting a regional transmission operator’s reserve margin.

Furthermore, the majority of the projects that SPS has applied for certification for will not even be built in New Mexico. Of the fourteen proposed certification projects, nine will be built in Texas, two in Oklahoma, and only three in New Mexico.⁹ While all the proposed projects may provide power to New Mexico customers, simply providing electricity is not enough to make those projects ones that are ‘contributing substantively to

⁴ 2025 SB 169 Fiscal Impact Report, p.2. <https://www.nmlegis.gov/Sessions/25%20Regular/firs/SB0169.PDF>

⁵ NMPRC Case No. 24-00257-UT, *Public Service Company of New Mexico’s Responses to Third Bench Request* (August 1, 2025); NMPRC Case No. 24-00257-UT, *El Paso Electric Company’s Response to Third Bench Request* (August 1, 2025).

⁶ NMSA 1978 62-6-26(E).

⁷ NMPRC Case No. 23-00073-UT, *Final Report of the Independent Monitor Submitted to the New Mexico Public Regulation Commission in the Matter of Southwestern Public Service Company’s 2023 Integrated Resource Plan for New Mexico* (July 17, 2025).

⁸ *Ibid.*, p. 12. “During early runs, it became apparent that the bids could not satisfy Winter 2026–2027 PRM requirements. SPS adjusted the model to extend Cunningham Unit 2 through March 2027. Tolk Units 1 and 2 were also extended from their planned retirement date of December 31, 2028, through March 2029 to accommodate increased planning reserve margins established by SPP, for which bids received were also insufficient.”

⁹ SPS Application, Table 2, p. 12.

reasonably expected economic development’. If EDD were to certify these out-of-state projects as economic development projects, the department would be shifting the definition of ‘economic benefits to New Mexico’ from projects which are *in New Mexico* to any project, anywhere, that might provide power to New Mexico residents and businesses. With such a precedent, there is no reason to prevent a project being built in another, non-contiguous state from being certified in the future, as long as a utility can argue – as SPS does in this application – that the power produced will be partially used by New Mexicans.

Projects built in Texas or Oklahoma may serve New Mexico customers with power, but they will not provide the sort of economic development which is commonly evaluated by economists and fiscal analysts. Out-of-state projects cannot provide property tax revenue to New Mexico, nor payments in lieu of taxes. They cannot make arrangements through New Mexico’s industrial revenue bond statutes to benefit New Mexico counties and school districts. The construction industry jobs that will be created to build them will not necessarily go to New Mexico residents and New Mexicans employed in them will not contribute income tax revenue to the state. Any permanent jobs in operating these facilities – usually the highest-paying jobs in a complex industry – will also not be likely to benefit New Mexico or be available to New Mexicans. The only certain economic development benefit that out-of-state generation projects will provide is the power they produce.

Admittedly, it is this power that SPS’s application states will provide the fuel for “more than \$1 billion over 35 years” in “total direct economic benefits”, with an additional \$5 billion attributed to oil and gas industry capital investments for electrification.¹⁰ Some of these economic benefits may indeed be realized by building out SPS’s generation portfolio. However, the benefits to New Mexico described in SPS’s application are generalized, not specific – the application states that “regional economic output is expected to increase, enabled by expanded electrical service capacity” – and therefore cannot be guaranteed. Capital investment from the portfolio of proposed certification projects is, as previously stated, highly weighted to Texas and Oklahoma. Oil and gas electrification, while clearly beneficial, is not guaranteed to progress at speed in the current volatile economic environment, where low oil prices (\$63.78/barrel as of August 15th, 2025 – a full \$14/barrel lower year-over-year¹¹) and the impact of federal tariff policies make business (even in the ever-productive Permian) less certain.

Most significantly, however, approving SPS’s application may prove particularly problematic for the site readiness goals of SB 170 in the long run. Certifying multiple generation projects which will be built outside of New Mexico as contributing substantively to New Mexico’s economic development potentially equates **any** new generation project with economic development – and gives **every** new generation project the possibility of gaining the cost recovery and expedited regulatory treatment privileges that SB 170 intended to give to specific site-readiness-related projects. This would not only defeat the purpose of SB 170, but also undermine the protections for New Mexico customers and businesses which currently exist in the regulatory framework for the monopoly utility franchise. The bargain of the monopoly utility franchise gives a regulated utility a guaranteed rate of return on new investments which corresponds to the utility’s investment risk. If all new-built utility generation projects are ‘economic development’ projects and deserve expedited ratemaking, the authority of the Public Regulation Commission to balance the interests of ratepayers, utility shareholders, and the public is no longer being upheld.

¹⁰ SPS Application, p. 13-15.

¹¹ Energy Information Administration. *Table 11 – Spot Prices of Crude Oil, Motor Gasoline, and Heating Oil, 2024 to Present.*
<https://www.eia.gov/petroleum/supply/weekly/pdf/table11.pdf>

Allowing any utility to certify nearly all of its proposed resource portfolio as an economic benefit to New Mexico damages the monopoly utility franchise and makes defining specific benefits to specific businesses or locations impossible. EDD should reject this application for certification, or alternately, certify only those projects which are sited within New Mexico, as they will at least provide guaranteed capital benefits from construction (an absolute bare minimum for economic development).

WRA appreciates the opportunity to provide public comment on this application, and requests that EDD deny it.

Sincerely,

AnnaLinden Weller
Senior Policy Advisor, Clean Energy – New Mexico