

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF PROPOSED }  
AMENDMENTS TO THE INTEGRATED }  
RESOURCE PLANNING RULES 17.7.3 NMAC }  
TO INCLUDE ENERGY STORAGE }  
RESOURCES }  
\_\_\_\_\_ }**

**Case No. 17-00022-UT**

**FINAL ORDER AMENDING INTEGRATED RESOURCE PLANNING RULES 17.7.3  
NMAC TO INCLUDE ENERGY STORAGE RESOURCES**

This matter came before the New Mexico Public Regulation Commission (the “Commission”), on its own Motion, commencing and establishing a rulemaking proceeding to amend the Commission Rule on Integrated Resource Plans for Electric Utilities, 17.7.3 NMAC, (herein after referred to as the “IRP Rule”). Being duly informed in the premises,

**THE COMMISSION FINDS AND CONCLUDES:**

1. The Commission’s IRP Rule was adopted in 2007 to implement the 2005 Efficient Use of Energy Act (“EUEA”), NMSA § 62-17-1 *et seq.* The IRP Rule, following the EUEA, requires that investor-owned electric utilities engage in a resource planning process that evaluates all feasible supply side and demand side resources on a comparable and consistent basis.

2. Section 62-17-10 of the EUEA provides in pertinent part: “Pursuant to the commission's rulemaking authority, public utilities supplying electric or natural gas service to customers shall periodically file an integrated resource plan with the commission. Utility integrated resource plans shall evaluate renewable energy, energy efficiency, load management, distributed generation and conventional supply-side resources on a consistent and comparable basis and take into consideration risk and uncertainty of fuel supply, price volatility and costs of

anticipated environmental regulations in order to identify the most cost-effective portfolio of resources to supply the energy needs of customers...”

3. Energy storage, which means technology that is capable of absorbing energy, storing it for a period of time, and thereafter delivering the energy, was not available as a commercially feasible alternative to supply and demand side resources at the time the IRP Rule was adopted.

4. Energy storage is the technology that can use energy generated during low cost off-peak periods to serve load during expensive peak periods. Energy storage has been shown to improve the overall utilization and economics of the electric grid. The ability to store electricity across the electric grid has been historically limited, but recent advances in new energy storage technologies, such as grid-scale batteries, are making viable the wide-scale deployment of electricity storage.<sup>1</sup>

5. Energy storage has begun to be deployed at commercial scale in the electric utility sector in the United States. The Federal Energy Regulatory Commission has issued three orders (Orders 755, 784, and 792) regarding the integration of energy storage resources into wholesale electric markets. States, including California, Utah, Oregon, Massachusetts and Texas have enacted legislation or opened regulatory dockets directed at increasing the use of energy storage in the electric grid.

6. Energy storage resources share some characteristics with supply side resources and some characteristics with load management, a demand side resource. Inclusion of energy storage resources in utility resource portfolios may potentially deliver some of the same benefits

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<sup>1</sup> See, the State of Charge Study <http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/energy-storage-initiative/>. The Massachusetts Department of Energy Resources, partnered with the Massachusetts Clean Energy Center (MassCEC) to develop *State of Charge*, a comprehensive Energy Storage Study.

to New Mexico utility customers that the Legislature identified for demand side resources in the EUEA, including reliability and protection from higher costs. *See* NMSA § 62-17-2.

7. The proposed rulemaking is authorized by the Commission's rulemaking authority provided by the New Mexico Constitution, Article XI, Section 2 (1996); NMSA 1978, §8-8-4(B) (10).

8. A copy of the Amended Rule is attached hereto as Exhibit I. (the "Amendment to the IRP Rule").

9. On February 8, 2017, the Commission issued its Order Initiating Rulemaking.

10. On February 28, 2017 and on March 5, 2017, the Notice of Proposed Rulemaking ("NOPR") in was published in the *Albuquerque Journal* and the *Las Cruces Sun* respectively.

11. On May 14, 2017, the NOPR was published in the New Mexico Register.<sup>2</sup>

12. The NOPR provided notice that a public hearing would be held on May 31, 2017 beginning at 2:00 p.m. at the office of the Commission located in the 4<sup>th</sup> floor of the PERA building. The purpose of the hearing would be to give interested individuals an opportunity to give oral comments.

13. The NOPR stated that written initial comments were due no later than April 19, 2017 and written Response comments were due no later than May 1, 2017.

14. The following written initial comments were filed:

a. One Hour Air Conditioning and Heating of Las Cruces, April 12, 2017

b. Public comments received by Commissioner Hall's Office by email filed on April 12, 2017 (Tom Solomon, Alevo USA Inc., Bruce Throne, Esq., Bruce

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<sup>2</sup>All as evidenced by affidavits of publication filed in this case.

Barnaby, Derek Rawson, Mark Gaiser of New Mexico Energy Minerals and Natural Resources Department, Athena Christodoulou of New Mexico Solar Energy Association, Theresa Cardenas of the Union of Concerned Scientists, Michael Sullivan and New Mexico Senator Martin Heinrich.

- c. Interwest Energy Alliance, April 17, 2017.
- d. Public Service Company of New Mexico (“PNM”), April 19, 2017.
- e. El Paso Electric (“EPE”), April 19, 2017.
- f. Southwestern Public Service Company, April 19, 2017.
- g. Utility Division Staff, May 15, 2017.
- h. Energy Storage Association (“ESA”), April 19, 2017.

1) The following written response comments were filed:

- a. EPE- May 22, 2017
- b. SPS-May 22, 2017
- c. PNM-May 22, 2017

15. The ESA supports the Commission’s NOPR, and recommends that 17.7.3 NMAC should include one further amendment, requiring utilities to identify the method they use to compare energy storage resources to other resources in the integrated resource plan and the assumptions the utility uses.

16. One Hour supports the Commission’s proposed amendments to 17.7.3 NMAC, and recommends that the Commission not address establishing benchmarks or targets for storage resources in this rulemaking because “[e]stablishing benchmarks or targets is likely to be more

complex and controversial, and could detract from the effort to ensure storage is considered in integrated resource planning.”

17. Interwest recommends that the Commission establish storage benchmarks.

18. In Staff’s Initial Comments, Staff stated that "it would be helpful to the policy development process for each utility to produce a cost benefit analysis of energy storage options that it has considered, if any, and why they were rejected."

19. In PNM’s initial comments stated that PNM supports the proposed amendments to 17.7.3 NMAC, with one minor modification. PNM suggests that "energy storage resources" be listed separately in the IRP Rule, instead of being combined with "demand response resources", since the potential uses of these resources are very different. PNM’s proposed modification to the proposed amendment to Paragraph E of the 17.7.3.9. NMAC as follows: “E. Load and resources table. The utility shall provide a load and resources table of its existing loads and resources at the time of its IRP filing. The load and resource table, to the extent practical, shall contain the appropriate components from the load forecast. Resources shall include: (1) utility-owned generation; (2) energy storage resources; ([2] 3) existing and future contracted-for purchased power including qualifying facility purchases; ([3] 4) purchases through net metering programs, as appropriate; ([4]5) demand-side resources [~~and energy storage resources,~~ ] as appropriate; and ([5]6) other resources relied upon by the utility, such as pooling, wheeling, or coordination agreements effective at the time the plan is filed.”

20. A public hearing was held on May 31, 2017.<sup>3</sup> Mr. John Ussery, representing Northern New Mexico College, supported local energy storage as a way to create jobs in the State and bring 100% energy independence. Ms. Merrie Lee Soules, supported energy storage as

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<sup>3</sup> As evidenced by the filing of the transcript of the proceedings in this case.  
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part of the IRP and stated that Arizona recently announced a large scale solar plus energy storage installation at less than five cents per kwh. Ms. Soules supported Staff's suggestion that energy storage may warrant giving extra weight to the consideration and inclusion of energy storage in the cost/benefit analysis. Ms. Soules supported ESA's recommended language that: "The utility shall identify its method for comparing energy storage resource options to other supply-side options and its assumptions actually used regarding the services provided by and forecast capital cost energy storage'" Mr. Chuck Noble, representing the Coalition for Clean Affordable Energy ("CCA") stated that it agreed with PNM's comment that energy storage should have its own category in 17.7.3.9.E NMAC. CCA also agreed with Staff that energy storage; in particular batteries, can increase the resilience of the system, can store energy in times of excess generation, and can produce power in times when demand exceeds supply without producing emissions. CCA also agreed with Staff suggestion that the Commission require each utility to produce a cost/benefit analysis of energy storage options that it has considered and explained why it was rejected, because without this information, there is no way to know how storage was considered by the utility or how it was modeled and because storage can actually make renewable resources, such as wind and solar, more efficient and economical by absorbing excess renewable generation that might otherwise be curtailed and making that energy available when needed. CCA remarked that the ESA made similar comments and supported ESA's provided language for the rule to assure that the costs and benefits of storage are appropriately considered. El Paso Electric Company stated that it supported the amendments that the Commission has proposed to the IRP Rule. Patricia Cardona, representing the Rio Grande chapter of the Sierra Club, supported amending the IRP Rule to include batteries and other types of energy storage

systems. Staff stated that it believed that it would benefit New Mexican ratepayers if our utilities were to incorporate energy storage as a part of their resource mix going forward. Staff stated that the language in the proposed amendment was sufficiently flexible to apply to the unique characteristics of New Mexico's respective utilities. Staff stated that it was important to balance a utility's need for flexibility with the policy benefits of energy storage and suggest that the IRP Rule contain more than just a mandate to *consider* feasible energy storage. Staff stated that the benefits that energy storage may be able to provide occurred at all stages, including the generation, transmission, and distribution processes, and may warrant giving extra weight to the consideration and inclusion of energy storage at the cost/benefit analysis stage. Staff suggested that it would be helpful to the policy development to require utilities to produce a cost/benefit analysis of energy storage options considered, and why they were rejected. Staff asserted that if the utility determines storage is not feasible we want to know why. Mr. John Fernandes, representing Invenergy, a traditional energy developer, supported the energy storage addition to the IRP rule and has been working with ENMRD on their energy storage.

21. The Commission has jurisdiction over the parties and the subject matter of this case.

22. Due and proper notice has been given.

23. The Commission finds that it should adopt PNM's suggestion that "energy storage resources" be listed separately in the IRP Rule 17.7.3.E NMAC, instead of being combined with "demand response resources", since the potential uses of energy storage resources are very different from demand response resources and also since energy storage resources are at times demand response resources and at times supply side resources.

24. The Commission further finds that, at this time, Staff's suggestion<sup>4</sup> in its Initial Comments and made at the public hearing are not necessary because the IRP Rule 17.7.3.9(G)(1) NMAC currently specifically requires utilities to "evaluate all feasible supply and demand-side resource options on a consistent and comparable basis." In accordance with 17.7.3.9(G)(1) NMAC utilities are already required to present an analysis comparing all feasible resources to each other in their filed integrated resource plan.

25. The Commission further finds that, at this time, ESA's suggestion that the Commission establish benchmarks or targets for energy storage, should not adopted be in this proceeding. The record demonstrates that presently only one public utility in the State of New Mexico has one energy storage facility. For that reason, at this time, there is not an adequate record on which to base benchmarks or targets even though targets and benchmarks may, in the future, be determined to be in the public interest and may be included in the future amendments to the IRP Rule.

26. For the reasons stated herein, the Commission finds that it is in the public interest to amend the IRP Rule as shown in Exhibit 1, attached to this Order.

**IT IS THEREFORE ORDERED:**

- A. The amendment to the IRP Rule, attached to Order as Exhibit 1 is hereby adopted.
- B. This Order is effective immediately.
- C. Copies of this Order shall be e-mailed to all persons listed on the attached Certificate of Service whose e-mail addresses are known. Copies of this Order shall be mailed via regular mail to all other persons listed on the attached Certificate of Service.

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<sup>4</sup>"... it would be helpful to the policy development for a utility to produce a cost/benefit of energy storage options considered and why they were rejected."



ISSUED under the Seal of the Commission at Santa Fe, New Mexico, this 2nd day of

August 2017.

NEW MEXICO PUBLIC REGULATION COMMISSION



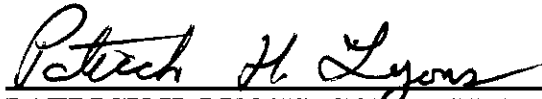
SANDY JONES, CHAIRMAN



CYNTHIA HALL, VICE CHAIR



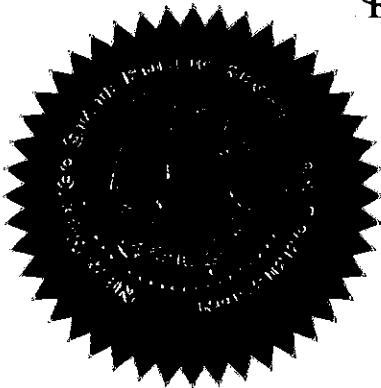
VALERIE ESPINOZA, COMMISSIONER



PATRICK H. LYONS, COMMISSIONER



LYNDA LOVEJOY, COMMISSIONER



## EXHIBIT I

### TITLE 17 PUBLIC UTILITIES AND UTILITY SERVICES

#### CHAPTER 7 ENERGY CONSERVATION

#### PART 3 INTEGRATED RESOURCE PLANS FOR ELECTRIC UTILITIES

17.7.3.7 **DEFINITIONS:** When used in this rule, unless otherwise specified the following definitions will apply: A. **availability factor** means the ratio of the time a generating facility is available to produce energy at its rated capacity, to the total amount of time in the period being measured;

B. **capacity factor** means the ratio of the net energy produced by a generating facility during a given time period, to the amount of net energy that could have been produced if the facility operated continuously at full capacity during that same time period;

C. **demand-side resources** means energy efficiency and load management, as those terms are defined in the Efficient Use of Energy Act;

D. **energy efficiency** means measures, including energy conservation measures, or programs that target consumer behavior, equipment or devices to result in a decrease in consumption of electricity without reducing the amount or quality of energy services;

E. **energy storage resource means a commercially available technology that is capable of absorbing energy, storing it for a period of time, and thereafter delivering the energy;**

F. **heat rate** means the ratio of energy inputs used by a generating facility expressed in BTUs (British thermal units), to the energy output of that facility expressed in kilowatt-hours;

F. **integrated resource plan (IRP)** means a public utility's plan to meet New Mexico jurisdictional retail customers' existing and future demand in accordance with this rule;

G. **load forecasting** means the prediction of the demand for electricity over the planning period for the utility;

H. **load management** means measures or programs that target equipment or devices to decrease peak electricity demand or shift demand from peak to off-peak periods;

I. **most cost effective resource portfolio** means those supply-side resources and demand-side resources that minimize the net present value of revenue requirements proposed by the utility to meet electric system demand during the planning period consistent with reliability and risk considerations;

J. **planning period** means the future period for which a utility develops its IRP; for purposes of this rule, the planning period is 20 years;

K. **public utility or utility has the same** meaning as in the Public Utility Act, except that it does not include a distribution cooperative utility, as defined in the Efficient Use of Energy Act;

L. **renewable energy** means electrical energy generated by means of a low or zero emissions generation technology with substantial long-term production potential and generated by use of renewable energy resources that may include solar, wind, hydropower, geothermal, fuel cells that are not fossil fueled and biomass resources; biomass resources are fuels, such as agriculture or animal waste, small diameter timber, salt cedar and other phreatophyte or woody vegetation removed from river basins or watersheds in New Mexico, landfill gas and anaerobically digested waste biomass; renewable energy does not include fossil fuel or nuclear energy.

[17.7.3.7 NMAC - N, 4-16-07]

17.7.3.9 **INTEGRATED RESOURCE PLANS FOR ELECTRIC UTILITIES:** Public utilities supplying electric service to customers shall file an IRP, along with an action plan, with the commission every three years. A. **Initial filings.** Utilities with greater than 200,000 New Mexico retail customers shall file 15 months after the effective date of this rule. Utilities with less than 200,000 New Mexico retail customers shall file 27 months after the effective date of this rule. An original and fourteen copies of the IRP shall be filed with the commission.

B. **Contents of IRP for electric utilities.** The IRP submitted by an electric utility shall contain the utility's New Mexico jurisdictional:

- (1) description of existing electric supply-side, energy storage, and demand-side resources;
- (2) current load forecast as described in this rule;
- (3) load and resources table;
- (4) identification of resource options;
- (5) description of the resource and fuel diversity;
- (6) identification of critical facilities susceptible to supply-source or other failures;

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- (7) determination of the most cost effective resource portfolio and alternative portfolios;
- (8) description of public advisory process;
- (9) action plan; and
- (10) other information that the utility finds may aid the commission in reviewing the utility's planning

processes.

C. Description of existing resources. The utility's description of its existing resources used to serve its jurisdictional retail load at the time the IRP is filed shall include:

- (1) name(s) and location(s) of utility-owned generation facilities;
- (2) rated capacity of utility-owned generation facilities;
- (3) fuel type, heat rates, annual capacity factors and availability factors projected for utility-owned generation facilities over the planning period;
- (4) cost information, including capital costs, fixed and variable operating and maintenance costs, fuel costs, and purchased power costs;
- (5) existing generation facilities' expected retirement dates;
- (6) amount of capacity obtained or to be obtained through existing purchased power contracts or agreements relied upon by the utility, including the fuel type, if known, and contract duration;
- (7) estimated in-service dates for utility-owned generation facilities for which a certificate of public convenience and necessity (CCN) has been granted but which are not in-service;
- (8) amount of capacity and, if applicable, energy, provided annually to the utility pursuant to wheeling agreements and the duration of such wheeling agreements;
- (9) description of existing demand-side resources, including (1) demand-side resources deployed at the time the IRP is filed; and (2) demand-side resources approved by the commission, but not yet deployed at the time the IRP is filed; information provided concerning existing demand-side resources shall include, at a minimum, the expected remaining useful life of each demand-side resource and the energy savings and reductions in peak demand, as appropriate, made by the demand-side resource;

**(10) description of each existing and approved energy storage resources, to include, at a minimum, the expected remaining useful life of the resource, its maximum capacity and dispatch characteristics, and operating costs;**

(110) reserve margin and reserve reliability requirements (e.g. FERC, power pool, etc.) with which the utility must comply and the methodology used to calculate its reserve margin;

(121) existing transmission capabilities:

(a) the utility shall report its existing, and under-construction, transmission facilities of 115 kV and above, including associated switching stations and terminal facilities; the utility shall specifically identify the location and extent of transfer capability limitations on its transmission network that may affect the future siting of supply-side resources;

(b) the utility shall describe all transmission planning or coordination groups to which it is a party, including state and regional transmission groups, transmission companies, and coordinating councils with which the utility may be associated;

(132) environmental impacts of existing supply-side resources:

(a) the utility shall provide the percentage of kilowatt-hours generated by each fuel used by the utility on its existing system, for the latest year for which such information is available;

(b) to the extent feasible, for each existing supply-side resource on its system, the utility shall present emission rates (expressed in pounds emitted per kilowatt-hour generated) of criteria pollutants as well as carbon dioxide and mercury;

(c) to the extent feasible, for each existing supply-side resource on its system, the utility shall present the water consumption rate; and

(143) a summary of back-up fuel capabilities and options.

D. Current load forecast.

(1) The utility shall provide a load forecast for each year of the planning period; the load forecast shall incorporate the following information and projections:

(a) annual sales of energy and coincident peak demand on a system-wide basis, by customer class, and disaggregated among commission jurisdictional sales, FERC jurisdictional sales, and sales subject to the jurisdiction of other states;

(b) annual coincident peak system losses and the allocation of such losses to the transmission and distribution components of the system;

(c) weather normalization adjustments;

(d) assumptions for economic and demographic factors relied on in load forecasting;

(e) expected capacity and energy impacts of existing and proposed demand-side resources; and

(f) typical historic day or week load patterns on a system-wide basis for each major customer class.

(2) The utility shall develop base-case, high-growth and low-growth forecasts, or an alternative forecast that provides an assessment of uncertainty (e.g., probabilistic techniques).

(3) Required detail. (a) The utility shall explain how the demand-side savings attributable to actions other than the utility-sponsored demand-side resources for each major customer class are accounted for in the utility's load forecast and the effect, as appropriate, on its load forecast of the utility-sponsored demand-side resources on each major customer class.

(b) The utility shall compare the annual forecast of coincident peak demand and energy sales made by the utility to the actual coincident peak demand and energy sales experienced by the utility for the four years preceding the year in which the plan under consideration is filed. In addition, the utility shall compare the annual forecast in its most recently filed resource plan to the annual forecast in the current resource plan. In its initial IRP filing, the utility shall provide information demonstrating how well its forecasts during the preceding four years predicted demand.

(c) The utility shall explain and document the assumptions, methodologies, and any other inputs upon which it relied to develop its load forecast.

E. Load and resources table. The utility shall provide a load and resources table of its existing loads and resources at the time of its IRP filing. The load and resources table, to the extent practical, shall contain the appropriate components from the load forecast. Resources shall include:

(1) utility-owned generation;

(2) **energy storage resources;**

(3) existing and future contracted-for purchased power including qualifying facility purchases;

~~(3)~~(4) purchases through net metering programs, as appropriate;

~~(4)~~(5) demand-side resources as appropriate; and

~~(5)~~(6) other resources relied upon by the utility, such as pooling, wheeling, or coordination agreements effective at the time the plan is filed.

F. Identification of resource options.

(1) In identifying additional resource options, the utility shall consider all feasible supply-side, **energy storage**, and demand-side resources. The utility shall describe in its plan those resources it evaluated for selection to its portfolio and the assumptions and methodologies used in evaluating its resource options, including, as applicable: life expectancy of the resources, the recognition of whether the resource is replacing/adding capacity or energy, dispatchability, lead-time requirements, flexibility and efficiency of the resource.

(2) For supply-side resource options, the utility shall identify the assumptions actually used for capital costs, fixed and variable operating and maintenance costs, fuel costs forecast by year, and purchased power demand and energy charges forecast by year, fuel type, heat rates, annual capacity factors, availability factors and, to the extent feasible, emission rates (expressed in pounds emitted per kilowatt-hour generated) of criteria pollutants as well as carbon dioxide and mercury.

(3) The utility shall describe its existing rates and tariffs that incorporate load management or load shifting concepts. The utility shall also describe how changes in rate design might assist in meeting, delaying or avoiding the need for new capacity.

G. Determination of the most cost effective resource portfolio and alternative portfolios.

(1) To identify the most cost-effective resource portfolio, utilities shall evaluate all feasible supply, **energy storage**, and demand-side resource options on a consistent and comparable basis, and take into consideration risk and uncertainty (including but not limited to financial, competitive, reliability, operational, fuel supply, price volatility and anticipated environmental regulation). The utility shall evaluate the cost of each resource through its projected life with a life-cycle or similar analysis. The utility shall also consider and describe ways to mitigate ratepayer risk.

(2) Each electric utility shall provide a summary of how the following factors were considered in, or affected, the development of resource portfolios:

- (a) load management and energy efficiency requirements;
- (b) renewable energy portfolio requirements;
- (c) existing and anticipated environmental laws and regulations, and, if determined by the commission, the standardized cost of carbon emissions;
- (d) fuel diversity;
- (e) susceptibility to fuel interdependencies;
- (f) transmission constraints; and
- (g) system reliability and planning reserve margin requirements.

(3) Alternative portfolios. In addition to the detailed description of what the utility determines to be the most cost-effective resource portfolio, the utility shall develop a reasonable number of alternative portfolios by altering risk assumptions and other parameters developed by the utility and the public advisory process.

H. Public advisory process. Public input is critical to the development and implementation of integrated resource planning in New Mexico. A utility shall incorporate a public advisory process in the development of its IRP. At least one year prior to the filing date of its IRP, a utility shall initiate a public advisory process to develop its IRP. The purpose of this process shall be to receive public input, solicit public commentary concerning resource planning and related resource acquisition issues. This process shall be administered as follows.

(1) The utility shall initiate the process by providing notice at least 30 days prior to the first scheduled meeting to the commission, interveners in its most recent general rate case, and participants in its most recent renewable energy, energy efficiency and IRP proceedings; the utility shall at the same time, also publish this notice in a newspaper of general circulation in every county which it serves and in the utility's billing inserts; this notice shall consist of:

- (a) a brief description of the IRP process;
- (b) time, date and location of the first meeting;
- (c) a statement that interested individuals should notify the utility of their interest in participating in the process; and
- (d) utility contact information.

(2) Upon receipt of the initial notice, the commission may designate a facilitator to assist the participants with dispute resolution.

(3) The utility or its designee shall chair the public participation process, schedule meetings, and develop agendas for these meetings. With adequate notice to the utility, participants shall be allowed to place items on the agenda of public participation process meetings.

(4) Meetings held as part of the public participation process shall be noticed and scheduled on a regular basis and shall be open to members of the public who shall be heard and their input considered as part of the public participation process. Upon request, the utility shall provide an executive summary containing a non-technical description of its most recent IRP.

(5) The purposes of the public participation process are for the utility to provide information to, and receive and consider input from, the public regarding the development of its IRP. Topics to be discussed as part of the public participation process include, but are not limited to, the utility's load forecast; evaluation of existing supply- and demand-side resources; the assessment of need for additional resources; identification of resource options; modeling and risk assumptions and the cost and general attributes of potential additional resources; and development of the most cost-effective portfolio of resources for the utility's IRP.

(6) In its initial IRP advisory process, the utility and participants shall explore a procedure to coordinate the IRP process with renewable energy procurement plans and energy efficiency and load management program proposals. Any proposed procedure shall be designed to conserve commission, participant and utility resources and shall indicate what, if any, variances may be needed to effectuate the proposed procedure.

I. Action plan.

(1) The utility's action plan shall detail the specific actions the utility will take to implement the integrated resource plan spanning a four-year period following the filing of the utility's IRP. The action plan will include a status report of the specific actions contained in the previous action plan.

(2) An action plan does not replace or supplant any requirements for applications for approval of resource additions set forth in New Mexico law or commission regulations.

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF PROPOSED AMENDMENTS )  
TO THE INTEGRATED RESOURCE PLANNING )  
RULES 17.7.3 NMAC TO INCLUDE ENERGY )  
STORAGE RESOURCES )**

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**Case No. 17-00022-UT**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing **Final Order Amending Integrated Resource Planning Rules 17.7.3 NMAC to Include Energy Storage Resources**, issued on August 2, 2017, was sent on August 2, 2017 as indicated below, to the following:

**Via Email to:**

Adam Bickford	<a href="mailto:abickford@swenergy.org">abickford@swenergy.org</a> ;
Adrian J. Rodriguez	<a href="mailto:Adrian.rodriquez@epelectric.com">Adrian.rodriquez@epelectric.com</a> ;
Alicia Armijo	<a href="mailto:Aarmijo@nmag.gov">Aarmijo@nmag.gov</a> ;
Allen Downs	<a href="mailto:ecomaxac@lifeisgood2.com">ecomaxac@lifeisgood2.com</a> ;
Amanda Alderson	<a href="mailto:aalderson@consultbai.com">aalderson@consultbai.com</a> ;
Amanda Edwards	<a href="mailto:AEdwards@lrrc.com">AEdwards@lrrc.com</a> ;
Amy Shelhamer	<a href="mailto:ashelhamer@courtneylawfirm.com">ashelhamer@courtneylawfirm.com</a> ;
Anastasia Stevens	<a href="mailto:ast@keleher-law.com">ast@keleher-law.com</a> ;
Andrea Crane	<a href="mailto:Ctcolumbia@aol.com">Ctcolumbia@aol.com</a> ;
Andrew Harriger	<a href="mailto:akharriger@sawvel.com">akharriger@sawvel.com</a> ;
Anthony Sisneros	<a href="mailto:Anthony.Sisneros@state.nm.us">Anthony.Sisneros@state.nm.us</a> ;
Anthony Trujillo	<a href="mailto:ajt@gknet.com">ajt@gknet.com</a> ;
Arnulfo Castaneda	<a href="mailto:acastaneda@cityofanthonymm.com">acastaneda@cityofanthonymm.com</a> ;
Athena Christodoulou	<a href="mailto:Athena.solpowernm@gmail.com">Athena.solpowernm@gmail.com</a> ;
Benjamin Leyba	<a href="mailto:bleyba@noraelectric.org">bleyba@noraelectric.org</a> ;
Benjamin Phillips	<a href="mailto:Ben.phillips@pnmresources.com">Ben.phillips@pnmresources.com</a> ;
Ben Lowe	<a href="mailto:Ben.lowe@alevo.com">Ben.lowe@alevo.com</a> ;
Bobbie J. Collins	<a href="mailto:BCollins@lrrc.com">BCollins@lrrc.com</a> ;
Bradford Borman-PRC	<a href="mailto:Bradford.borman@state.nm.us">Bradford.borman@state.nm.us</a> ;
Brian J. Haverly	<a href="mailto:bjh@keleher-law.com">bjh@keleher-law.com</a> ;
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