
[EXTERNAL] 24-00266-UT 2024-11-19 NEE's Unopposed Motion to Intervene

From Mariel Nanasi <mariel@seedsbeneaththesnow.com>

Date Tue 11/19/2024 9:49 AM

To Brian J. Haverly <bjh@jhkmlaw.com>; Julianna T. Hopper <jth@jhkmlaw.com>; Rebecca Carter <rebecca.carter@nmgco.com>; Hart, Anita L. <anita.hart@nmgco.com>; Weseen, Gerald C. <gerald.weseen@nmgco.com>; Strauser, Nicole V. <nicole.strauser@nmgco.com>; Gorman, Mike <mgorman@consultbai.com>; Peter J. Gould Esq <peter@thegouldlawfirm.com>; Kelly Gould <kelly@thegouldlawfirm.com>; Selah Kaiser <office@thegouldlawfirm.com>; Gideon Elliot <gelliot@nmag.gov>; J. Randall Woolridge <jrwoolridge@gmail.com>; Sydnee Wright <swright@nmag.gov>; Jim Cotton <ctcolumbia@aol.com>; Doug Gegax <dgegax@nmsu.edu>; Mariel Nanasi <mariel@seedsbeneaththesnow.com>; lynch.cara.nm@gmail.com <lynch.cara.nm@gmail.com>; Sullivan, Dylan <dsullivan@nrdc.org>; Lance Kaufman <lance@aegisinsight.com>; Shannon Sweeney <shannon@sweeneyesq.com>

 1 attachment (144 KB)

24-00266-UT 2024-11-19 NEE's Unopposed Motion to Intervene.pdf;

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Good morning colleagues,

Attached please find NEE's Unopposed Motion to Intervene in Case No. 24-00266-UT.

Mariel Nanasi

Lead Attorney and Executive Director

New Energy Economy

300 East Marcy St., Santa Fe, NM 87501

Ogaa Po'ogeh - unceded occupied Tewa land

505-469-4060 (cell)

NewEnergyEconomy.org

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
NEW MEXICO GAS COMPANY, INC.; EMERA INC.,)
EMERA U.S. HOLDINGS INC.; NEW MEXICO GAS)
INTERMEDIATE, INC.; TECO HOLDINGS, INC.;)
TECO ENERGY, LLC; BCP INFRASTRUCTURE)
FUND II, LP; BCP INFRASTRUCTURE FUND II-A,)
LP; BCP INFRASTRUCTURE FUND II GP, LP;)
SATURN UTILITIES, LLC; SATURN UTILITIES)
HOLDCO, LLC; SATURN UTILITIES)
AGGREGATOR, LP; SATURN UTILITIES)
AGGREGATOR GP, LLC; SATURN UTILITIES)
TOPCO, LP; AND SATURN UTILITIES TOPCO GP,)
LLC FOR THE ACQUISITION OF TECO ENERGY)
LLC, AND FOR ALL OTHER APPROVALS AND)
AUTHORIZATIONS REQUIRED TO CONSUMMATE)
AND IMPLEMENT THE ACQUISITION)**

Docket No. 24-00266-UT

NEW ENERGY ECONOMY’S UNOPPOSED MOTION TO INTERVENE

COMES NOW New Energy Economy (NEE), by and through its attorneys Mariel Nanasi, pursuant to 1.2.2.10.C & D, 1.2.2.23(A) and 1.2.2.25(H)(3) NMAC moves the New Mexico Public Regulation Commission (PRC) for leave to intervene and for expansion of the service list, and requests each party hereto to serve all discovery requests and responses on undersigned counsel in this proceeding. In support of this Motion, New Energy Economy states:

1. The subject matter of this proceeding and its outcome will have an impact on NEE, its constituents, and all people of New Mexico. This docket includes numerous issues that are of importance to NEE, including whether New Mexico Gas Company (“NMGC”), Saturn Utilities Holdco, LLC (“Saturn Holdco”), and affiliated applicants, should be granted approval of the acquisition by Saturn Holdco of NMGC and the divestiture by Emera, Emera U.S. Holdings, Inc., and TECO Holdings, Inc. of their current ownership of NMGC (the “Transaction”).

2. Saturn Holdco is owned by a set of infrastructure investment funds who are among the applicants. In short, Saturn Holdco will replace Emera as owner of NMGC.
3. No other party in this proceeding can adequately represent the interests of New Energy Economy members.
4. New Energy Economy has actively participated in many cases before the PRC involving New Mexico utilities, including NMGC's last rate cases, Case No. 21-00267-UT and 23-000255-UT, its Certificate of Convenience and Necessity ("CCN") application for approval of a Liquefied Natural Gas Plant, Case No. 22-00309-UT.
5. Pursuant to NM PRC rules New Energy Economy respectfully requests that NEE be served via U.S. mail with all testimony (including supplemental, rebuttal testimony, etc.) and by email with copies of all filings in this matter as well as all discovery requests, responses and objections made by any party in this proceeding. Service should be provided by email to:

Mariel Nanasi – mariel@seedsbeneaththesnow.com

All testimony should be served via hard copy to:

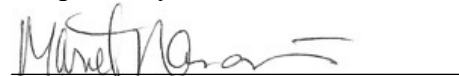
Mariel Nanasi, 300 East Marcy St., Santa Fe, New Mexico, 87501.

6. NEE circulated its motion to the service list and requested parties' positions on NEE's intervention. NMGC and other Joint Applicants, County of Los Alamos, CCAE, PRC Staff and FEA/DOE do not object. No other party indicated its position before the filing of this Motion.

Wherefore, New Energy Economy requests the Commission grant it leave to intervene in and become a party to this case, the service list be expanded as requested, and New Energy Economy be served with all discovery and communications in this case.

Date: November 19, 2024.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Mariel Nanasi', is written over a horizontal line.

Mariel Nanasi

Attorney for New Energy Economy

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BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
NEW MEXICO GAS COMPANY, INC.; EMERA INC.,)
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LLC FOR THE ACQUISITION OF TECO ENERGY)
LLC, AND FOR ALL OTHER APPROVALS AND)
AUTHORIZATIONS REQUIRED TO CONSUMMATE)
AND IMPLEMENT THE ACQUISITION)**

Docket No. 24-00266-UT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing

**NEW ENERGY ECONOMY’S UNOPPOSED MOTION FOR LEAVE TO INTERVENE,
REQUEST FOR DISCOVERY
AND EXPANSION OF SERVICE LIST**

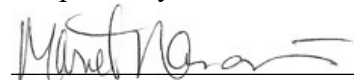
was sent via email to the following parties on the date indicated below:

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DATED this 19th day of November 2024.

Respectfully submitted,



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