
[EXTERNAL] 22-00154-UT-2025-01-31-PNM January 2025 Wildfire Mitigation, Vegetation Management, and Infrastructure Expense Report

From Haskins, Anne <Anne.Haskins@pnm.com>

Date Fri 1/31/2025 5:10 PM

To Records, PRC, PRC <PRC.Records@prc.nm.gov>; Medeiros, Anthony F., PRC <Anthony.Medeiros@prc.nm.gov>; Kippenbrock, Ana, PRC <Ana.Kippenbrock@prc.nm.gov>; Ryan, Christopher, PRC <Christopher.Ryan@prc.nm.gov>; Lundin, Robert, PRC <Robert.Lundin@prc.nm.gov>; Cameron, Scott, PRC <scott.cameron@prc.nm.gov>; akharriger@sawvel.com <akharriger@sawvel.com>; ckolberg@abcwua.org <ckolberg@abcwua.org>; dahlharris@hotmail.com <dahlharris@hotmail.com>; dgarrett@resolveuc.com <dgarrett@resolveuc.com>; edfarrarcpa@outlook.com <edfarrarcpa@outlook.com>; kherrmann@stelznerlaw.com <kherrmann@stelznerlaw.com>; efflores@stelznerlaw.com <efflores@stelznerlaw.com>; mgarrett@garrettgroupllc.com <mgarrett@garrettgroupllc.com>; nwinter@stelznerlaw.com <nwinter@stelznerlaw.com>; mdemeule@bernco.gov <mdemeule@bernco.gov>; vjoe@bernco.gov <vjoe@bernco.gov>; bvigil@bernco.gov <bvigil@bernco.gov>; mreno@reno-energy.com <mreno@reno-energy.com>; ndowney@bernco.gov <ndowney@bernco.gov>

 1 attachment (7 MB)

22-00270-UT-2025-01-31-

PNM_Wldfire_Mitigation_Vegetation_Managment_and_Infrastructure_Maintenance_Expense_2025_Report.pdf;

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

Good afternoon,

Attached for filing is *PNMs 2025 Wildfire Mitigation, Vegetation Management, and Infrastructure Maintenance Expense Report*.

Thank you,

Anne Haskins

Public Service Company of New Mexico
Project Manager, Regulatory Policy & Case Management
office (505)241-2839 cell (505)816-8086
anne.haskins@pnm.com



Be the Reason
everyone goes home safe



January 31, 2025

Ms. Melanie Sandoval
Records Bureau Chief
prc.records@prc.nm.gov

Re: **Public Service Company of New Mexico's Annual Report
Wildfire Mitigation, Vegetation Management and Infrastructure Maintenance
Expense Spending – Compliance Filing in Case No. 22-00154-UT**

Dear Ms. Sandoval:

Public Service Company of New Mexico ("PNM") hereby submits its Annual Wildfire Mitigation, Vegetation Management and Infrastructure Maintenance Expense Spending Report for 2024, pursuant to the requirements of the Final Order and Staff's February 2, 2024 Response to the Commission's January 3, 2024 Final Order *Requiring Staff Response Regarding Additional Reporting Requirements for PNM's Wildfire Mitigation, Vegetation Management and Infrastructure Maintenance Expense Spending in Case No. 22-00270-UT*.¹

The Order provides:

1. As directed by the Commission in Ordering Paragraph E of the January 3, 2024 Final Order as amended, Staff submits this Response providing Staff's recommendation regarding the additional reporting requirements required by PNM for wildfire mitigation, vegetation management, and infrastructure maintenance expense spending.
2. PNM requested that \$900,000 be incorporated into the Company's revenue requirement to reflect its forecasted incremental wildfire mitigation expenses. \$225,000 of that amount requested is for wildfire mitigation transmission costs and \$675,000 is for wildfire mitigation distribution costs. PNM has identified advancements in fire prevention costs which include: 1) remotely sensed data collection for all distribution and transmission facilities in high-risk areas, 2) using a helicopter collection platform, and 3) mitigation of wildlife ignitions using remotely sensed. Staff recommends that PNM supply an annual report detailing 1) the costs of remote data collection, 2) whether transmission and distribution facilities are replaced as result of the mitigation, and 3) the resulting impact on avoiding wildfires.
3. PNM requested that \$2,000,000 be incorporated into the Company's revenue requirement to reflect its vegetation management costs. Staff recommends that PNM submit annually the costs expended including, but not limited to 1) labor and equipment costs to manage vegetation, 2) contract costs to manage vegetation, and 3) the location of vegetation

¹ On December 19, 2024, the Commission issued an Order on Motion and Closing Docket that required PNM to file this compliance report in Docket No. 22-00154-UT. *See Decretal Paragraph B.*

Main Offices
Albuquerque, NM 87158 -1105
P 505 241-0675
F 505 241-2347
PNM.com



management activities in PNM's service territory and the resulting impact on avoiding wildfires.

4. PNM requested a \$1.5 million incremental increase to its infrastructure maintenance expense. Of that amount, \$500,000 pertains to increased transmission maintenance, \$300,000 pertains to overhead distribution line maintenance, and \$700,000 pertains to underground distribution line maintenance. Staff recommends that PNM supply a detailed annual report for the expenditures for transmission and distribution line maintenance as well as expenditures for underground distribution line maintenance. PNM should also detail 1) the cause of the expenditures, 2) how the costs resulted in avoiding wildfires, 3) what fires in the State of New Mexico in year warranted PNM to make such expenditures. The report should also coincide with New Mexico State Forestry and wildfires that occurred in the State within PNM's service territory.
5. PNM should also provide detailed costs that are associated with PNM's comprehensive Wildfire Mitigation Plan as detailed on their website. PNM should file this financial report annually by January 31 of each year.

If you have questions or need further information in this regard, I can be reached by phone at (505) 241-2845.

Sincerely,

/s/ Anne Haskins

Anne Haskins, Project Manager
PNM Regulatory Policy & Case Management
Public Service Company of New Mexico

Cc: COS for Case Nos. 22-00270-UT and 22-00154-UT

GCG#533398

2024 ANNUAL REPORT

Forecasted Incremental Wildfire Mitigation Expenses:

In Case No. 22-00270-UT, PNM forecasted incremental Transmission and Distribution (“T&D”) Operating and Maintenance (“O&M”) expenditures related to wildfire mitigation plan activities for the Test Period (Calendar Year 2024). PNM’s forecast comprised approximately \$0.9 million in incremental O&M expenditures reflected in the Test Period and includes both T&D expenses.¹ Table 1, provides the actual incremental wildfire mitigation expenses for 2024.

Table 1

Incremental T&D O&M Expenditures Related to Wildfire Mitigation Plan Activities			
<u>WMP Activity</u>	<u>Requested Test Period Expenditure</u>	<u>Actual Test Period Expenditure</u>	<u>FERC account</u>
Wildfire Mitigation Management - Transmission	\$ 225,000	\$ 297,827	571, Maintenance of overhead lines (Transmission - major);
Wildfire Mitigation Management - Distribution	\$ 675,000	\$ 718,950	573, Maintenance of overhead lines (Distribution - major)
Total	\$ 900,000	\$ 1,016,777	

Remote Data Collection Costs

For 2024, PNM’s Remote Data Collection costs was \$289,015.69.

Whether Transmission and Distribution Facilities are Replaced as a Result of the Mitigation

PNM conducts field evaluations of facilities to determine resiliency and integrity for future wildfire safe operations. If a facility is deemed to not meet standards, PNM will replace these T&D facilities as needed. Replacement of these facilities are included in PNM’s capital and expense expenditures.

Resulting Impact of Reducing Wildfire Risks

PNM has implemented new software that relies on collected satellite imagery and artificial intelligence (“AI”) to identify hazard trees and vegetation encroaching close to its power lines to optimize vegetation management. PNM further revised its Wildfire Mitigation and Public Safety Power Shutoff plans. PNM also revised its engineering standards for wood poles within HFAs to a structurally stronger and taller poles, wider crossarms, and wrapped all new poles with fire-resilient mesh coatings to improve resiliency and wildfire sustainability.

And in 2024, PNM conducted a pole testing and treatment program of all wood T&D poles within its HFAs. All poles with serious defects have been replaced and the remaining poles identified with minor defects will be repaired within the next two years. All the work above will help reduce wildfire risks.

¹ See Direct Testimony of Wesley W. Gray, December 5, 2022, pg. 70.

Vegetation Management Costs:

In Case No. 22-00270-UT, PNM forecasted incremental T&D and O&M expenditures related to vegetation management of approximately \$2.0 million for the Test Year. Table 2 provides the actual incremental wildfire mitigation expenses for 2024 and contains the annual contract, labor and equipment costs related to managing vegetation, as requested by Staff.

Table 2

Incremental T&D O&M Expenditures Related to Vegetation Management				
<u>Vegetation Management</u>	<u>Requested Test Period Expenditure</u>	<u>Actual Test Period Expenditure</u>	<u>Total O&M</u>	<u>FERC account</u>
Additional Transmission Vegetation Management	\$ 300,000	\$ 307,198	\$ 614,313	571, Vegetation Management of overhead lines (Transmission - major)
Additional Distribution Vegetation Management	\$ 1,700,000	\$ 2,799,167	\$ 4,629,791	593, Vegetation Management of overhead lines (Distribution - major)
Total	\$ 2,000,000	\$ 3,106,365	\$ 5,244,104	

Location of Vegetation Management Activities

In 2024, PNM prioritized Hazardous Fire Areas (“HFAs”) as outlined below; vegetation management was also conducted in non-HFAs throughout New Mexico. PNM uses publicly available USFS Wildfire Hazard Potential (“WHP”) dataset, which ranks hazard potential in five classes ranging from Very Low to Very High and includes each Fire Weather Zone (“FWZ”).

<i>HFA Name</i>	<i>Type of facility</i>	<i>Area (Sq. mi.)</i>	<i>FWZ²</i>	<i>Predictive service area (PSA) (primary)</i>	<i>PNM Division</i>
Bosque ³	T&D	29	NM 106	SW09 South/Central NM Lowlands	Sandoval Albuquerque Valencia
Clayton East	T&D	13	NM 104	SW13 Northeast NM/NW TX	Clayton
Clayton West	T&D	97	NM 104	SW13 Northeast NM/NW TX	Clayton
Fort Sumner 3	Transmission	819	NM 125 & 126	SW13 Northeast NM/NW TX	Transmission
Las Vegas	T&D	135	NM 122 & 123	SW10 Sangre de Christo Mtns	Las Vegas
Mt. Taylor	T&D	298	NM 105	SW07 Northwest NM Mtns	Ambrosia Lake Marquez
Ruidoso	T&D	312	NM 113	SW12 South/Central NM Mountains	Ruidoso
Sandia Mtns	T&D	492	NM 106 & 124	SW11 Central NM Mtns & Plains	East Mountain
Santa Fe	T&D	961	NM 105, 106 & 121	SW10 Sangre de Christo Mtns SW07 Northwest NM Mtns	Santa Fe
Santa Fe East	Transmission	251	NM 124 & 126	SW10 Sangre de Christo Mtns	Santa Fe
Santa Fe North	T&D	704	NM 120 & 121	SW07 Northwest NM Mtns	Santa Fe
Silver City	T&D	2867	NM 110	SW08 White Mtns & Gila Region	Silver City

Resulting Impact on Reducing Wildfire Risk

PNM's Utility Vegetation Management ("UVM") incorporates Integrated Vegetation Management ("IVM") principles to reduce wildfire risk and promote ecological health. UVM identifies and mitigates potential ignition sources, decreases available fuels, creates defensible spaces/firebreaks, and improves accesses for emergency responders.

Infrastructure Maintenance Expense:

In Case No. 22-00270-UT, PNM forecasted incremental T&D and O&M expenditures related to aging T&D infrastructure maintenance activities of approximately \$1.5 million for the Test Year. Tables 3 and 4 provide actual incremental infrastructure maintenance expenses for 2024, and the annual costs related to infrastructure maintenance, as requested by Staff.

Table 3

Incremental T&D O&M Expenditures Related to Aging T&D Infrastructure Maintenance Activities			
<u>Aging Infrastructure Maintenance Activities</u>	<u>Requested Test Period Expenditure</u>	<u>Actual Test Period Expenditure</u>	<u>FERC account</u>
Increased Maintenance – Transmission	\$ 500,000	\$ 146,630	563, Overhead line expense (Transmission – major)
Overhead lines – Distribution	\$ 300,000	\$ 1,604,567	593, Maintenance of overhead lines (Distribution – major)
Underground lines – Distribution	\$ 700,000	\$ 2,122,188	594, Maintenance of underground lines (Distribution – major)
Total	\$ 1,500,000	\$ 3,873,385	

Table 4

Total Infrastructure Maintenance Expenditures	
Maintenance – Transmission	\$ 4,275,038
Maintenance – Distribution	\$ 11,741,294
Total	\$ 16,016,332

Cause of the Expenditures

PNM's efforts include maintaining the Company's T&D substations to ensure these critical facilities' safe and reliable operation. The number of substations has increased over the last several years due to significant growth. The increased number of substation assets requires additional funding to conduct regular maintenance. Transmission Line expenditures include the costs of staffing, equipment, materials, and supplies needed to inspect, diagnose, and repair or replace transmission assets within PNM's service territory. This work consists of both planned maintenance activities and emergent work in response to equipment damage or failures.

How the Costs Resulted in Reducing Wildfire Risks

PNM's maintenance and asset management activities contribute to reducing wildfire risks by identifying and mitigating equipment deficiencies that could potentially be ignition sources for wildfires. Line patrols are conducted to identify broken cross arms; failed insulators, cutouts, and lightning arrestors; detached guys; floating conductors; etc. PNM also installs bird guarding on field assets to reduce the chance of birds and critters catching fire and falling to the ground.

Fires in the State of New Mexico

Within PNM's service territory, the South Fork and Salt Fires required wildfire response and recovery expenditures. The New Mexico State Forestry Division identified these fires in its 2024 Annual Report. See <https://www.emnrd.nm.gov/officeofsecretary/wp->

[content/uploads/sites/2/emmrd_annual_report_2024.pdf](#). PNM is providing page 22 of the report as Attachment 1.

Costs Associated with PNM's Wildfire Mitigation Plan (WMP):

PNM's Wildfire Mitigation Plan is reviewed annually prior to wildfire season and revised as needed. The WMP provides information on PNM's progress and work to date along with advancement toward our mitigation objectives. The Plan covers wildfire risk drivers, and programs and strategies to mitigate them. The document is available on [PNM.com/wildfire-safety/](https://www.pnm.com/wildfire-safety/). (See Attachment 2 to this report). A breakdown of the costs associated with the revisions to the WMP are included in Table 4 and are a subset of costs provided in Table 2.

For 2024, the WMP contains five program elements.

1. The risk analysis comprehensively assesses wildfire risk throughout the PNM's geographic information system (GIS) assessment to identify areas with the highest wildfire risk. PNM can use the results to prioritize fire hardening activities, enhance inspection and maintenance activities, implement field work restrictions during critical fire weather and make system operations decisions. The substation assessment required onsite assessments to determine which substations are at highest risk of having an internal equipment fire spread. PNM prioritizes treatments for substations that score highest in its risk assessments.
2. The preventive programs and strategies include vegetation management, outage and ignition management, engineering and technical solutions, implementing design and construction practices, enhanced inspection and maintenance, and system protection from wildfire. These efforts focus on high fire areas in PNM's system and are in addition to routine vegetation management conducted on other facilities.
3. The fire weather operating plan implements industry best practices for increasing situational awareness based on meteorological conditions, predictive tools, and monitoring. Improved situational awareness informs operational practices, such as the need to escalate work restrictions or implementing a public safety power shutoff ("PSPS"). PSPS events require close coordination between PNM field operators, dispatchers, state, local and federal agencies and the community at-large.
4. WMP's emergency preparedness element includes wildfire response and recovery of wildfire zones.
5. Support during Wildfire incidents support fire discovery and reporting efforts as well as methods to evaluate fire risk and communicate fire information as appropriate.

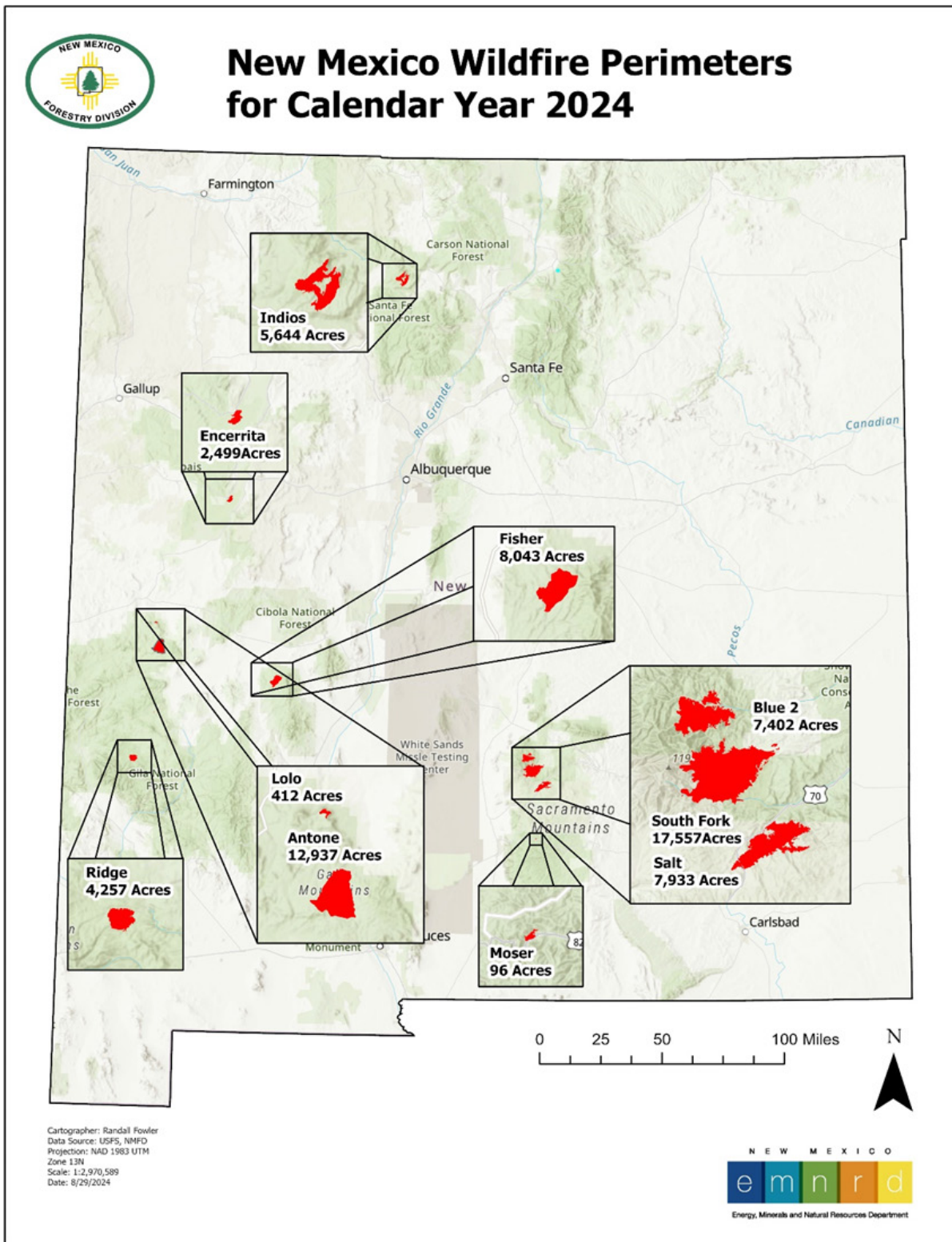
Table 5

Costs Associates with PNM's Comprehensive Wildfire Mitigation Plan (WMP 2024)		
<u>Program Elements</u>	<u>Expenditures</u>	<u>Notes</u>
<i>Risk Analysis and Identification of Hazardous Fire Areas</i>		
Service Territory Risk Assessment	\$ 430,009	Use of Artificial Intelligence and HFA Planning and Maintenance
Geographic Information System HFA Layer	\$ 20,252	Athena: Satellite imagery and AI tech for fire risk assessment / 3 yr subscription
Substation Assessments & VM Activities	\$ 20,300	Gavilan Sub = \$15,000 Hollywood Sub = \$4,500 Ski Apache Sub= \$800
Total	\$ 470,561	
<i>Preventive Programs and Strategies</i>		
Remotely Sensed Data Collection, Enhanced Inspections/Clearing	\$ 289,016	Remotely sensed satellite imagery and AI tech for tree/conductor clearance distances and hazard tree assessment
Vegetation Management-Transmission	\$ 307,115	HFA Vegetation work
Vegetation Management-Distribution	\$ 1,830,634	HFA Vegetation work
Inspection, Inventorying and Maintenance of Overhead Lines including Asset Inventory and Corrective Maintenance	\$ 732,953	Osmose: Pole assessment & treat of applicable distribution and transmission poles within HFAs
Engineering and Technical Solutions/Infrastructure Advancements for HFAs - Communication and Electric Devices	\$ 84,000	EDM International: Wildfire Mitigation Solutions
Engineering and Technical Solutions/Infrastructure Advancements for HFAs - Wildlife Protections	\$ 22,000	EDM International: Wildfire Mitigation Solutions, Wildlife protection study

Engineering and Technical Solutions/Infrastructure Advancements for HFAs - Poles, Conductors, Crossarms and Hardware	\$ 84,960	EDM International: Wildfire Mitigation Solutions, Infrastructure project management
Engineering and Technical Solutions/Infrastructure Advancements for HFAs - Conversion from REA to PNM Standards	\$ 84,960	EDM International: Wildfire Mitigation Solutions, Standards project manager
Engineering and Technical Solutions/Infrastructure Advancements for HFAs - Continuing Education	\$ 35,000	International Wildfire Mitigation Risk Consortium fees: A group of North American & Australian utilities establishing a consortium focused on studying and sharing best practice insights for wildfire risk mitigation.
Public Safety Power Shutoff (PSPS) and Annual Fire Prevention and Fire Safety Training	\$ 40,000	Randy Lyle and Associates. wildfire consulting: PSPS
Total	\$ 3,510,638	
<i>Fire Weather and Operational Strategies</i>		
Situational Awareness- Meteorological Services	\$ 31,272	Indjiwatch: Weather forecasting. Fire, Red Flag, extreme weather alerts
Situational Awareness- Predictive Tools	\$ 48,000	Randy Lyle and Associates: Daily Situational Awareness
Situational Awareness- Monitoring	\$ 5,836	Randy Lyle and Associates : SME consultation
Coordination Costs - State, Local, Federal Agencies, and Community at-large	\$ 5,302	Coordination with Community Leaders
Total	\$ 90,410	
<i>Emergency Preparedness</i>		
Wildfire Response and Recovery and Incident Response	\$ 2,643,156	South Fork Fire response and recovery
Cooperation and Coordination Costs - Training/Exercises	\$ 18,523	

Recovery and Restoration Activities of Wildfire Zones	\$ 2,886,796	Gila National Forest ROW VM expansion project
Total	\$ 5,548,475	
<i>Customer Support During Wildfire Incidents</i>		
Corporate communications, low-income customer support, partnerships with various community organizations to secure more assistance, and fire information communications are not subject to fluctuations due to wildfire events.		
Total Costs Associates with PNM's Comprehensive Wildfire Mitigation Plan (WMP 2024)	\$ 9,620,084	

GCG#533400





Wildfire Mitigation Plan (WMP) 2024



Talk to us.



This page was intentionally left blank.

TABLE OF CONTENTS

Executive Summary	1
1.0 Introduction	2
1.1 Purpose and Objectives	2
1.2 Overview of PNM	2
1.2.1 New Mexico Flora and Geography	3
2.0 Risk Analysis and Identification of Hazardous Fire Areas	5
2.1 Service Territory Risk Assessment	5
2.1.1 Use of Artificial Intelligence.....	8
2.1.2 HFA Planning and Maintenance	9
2.2 PNM’s Geographic Information System HFA Layer	9
2.3 Substation Assessment.....	10
3.0 Overview of Preventive Programs and Strategies	13
3.1 Remotely Sensed Data Collection.....	13
3.2 Vegetation Management (VM)	13
3.2.1 VM Program Overview	13
3.2.2 VM Plan Advancement for Wildfire Risk Mitigation.....	15
3.3 Inspection, Inventorying and Maintenance of Overhead Lines.....	15
3.4 Overhead Power Delivery Infrastructure Advancements.....	16
3.4.1 Line Design, Construction, Retrofitting and Operating Enhancements for HFAs	16
3.4.2 Industry R&D, Best Practices, and Continuous Improvement.....	19
3.5 Leveraging Outage Data for Ignition Management	19
3.6 Public Safety Power Shutoff (PSPS)	20
4.0 Escalating Fire Weather and Operational Strategies	21
4.1 Annual Fire Prevention and Fire Safety Training.....	21
4.2 Daily Situational Awareness	21
4.3 Escalating Work Restriction Matrices	21
4.3.1 Fire Season at PNM	34
4.3.2 Red Flag Warning Protocol	34

4.3.3 Indji Watch.....	36
5.0 Emergency Preparedness	37
5.1 Wildfire Response and Recovery	37
5.2 Cooperation and Collaboration	37
5.3 In-Place PNM Wildfire Incident Processes.....	38
5.4 Recovery and Restoration Activities	40
6.0 Support During Wildfire Incidents.....	41
6.1 Corporate Communications.....	41
6.2 Customer Support	41
6.3 Low-income Customer Support.....	42

LIST OF FIGURES

Figure 1. PNM Service Area.....	4
Figure 2. PNM HFAs, USFS Boundaries and Fire Weather Zones	6
Figure 3. T&D Miles Inside/Outside HFAs	8
Figure 5. Using Outage Data with Mention of Fire for HFA Identification	20
Figure 6. Sample Daily SA Report	21
Figure 7. NWS Forecasting Offices	35

LIST OF TABLES

Table 1. HFA Names and Characteristics	7
Table 2. Athena-Derived Attributes and Descriptions.....	9
Table 3. HFA GIS Shapefile Attributes and Descriptions.....	10
Table 4. Description of Select Attributes.....	11
Table 5. Substation Assessment Attributes	12
Table 6. Mitigation Level Table	22

LIST OF APPENDICES

Appendix A – Hazardous Fire Areas – Detailed Maps

ABBREVIATIONS AND ACRONYMS

APP	Avian Protection Plan
BLM	Bureau of Land Management
CMR	Crisis Management and Resilience Team
CorpComms	Corporate Communications
CSP	Completely Self Protected
CWA	County Warning Area
DGIS	Drafting and Geographic Information System Department
DOC	Distribution Operations Center
DSC	Distribution Standards Committee
EEI	Edison Electric Institute
EPRI	Electric Power Research Institute
FFWW	Fire Weather Watch
FWZ	Fire Weather Zone
Fire Hx	Fire History
GIS	Geographic Information System
HFA	Hazardous Fire Area
ICS	Incident Command System
IFD	Internal Fault Device
kV	kilovolt
LiDAR	Light Detection and Ranging Remote Sensing Method
NERC	North American Electric Reliability Corporation
NESC	National Electric Safety Code
NWS	National Weather Service
OMS	Outage Management System
PNM	Public Service Company of New Mexico
PNMR	PNM Resources
PSA	Predictive Service Area
PSPS	Public Safety Power Shutoff
PWOPS	Power Operations Department
RAWS	Remote Automated Weather Station
REA	Rural Electric Association
RFW	Red Flag Warnings
ROW	Right-of-Way
SA	Situational Awareness
SCADA	Supervisory Control and Data Acquisition
T&D	Transmission and Distribution
TNMP	Texas-New Mexico Power Co.
USFS	United States Forest Service
VM	Vegetation Management
WECC	Western Electricity Coordinating Council
WHP	Wildfire Hazard Potential
WMP	Wildfire Mitigation Plan

Executive Summary

PNM strongly believes in the safety of our customers, their communities, and our employees. Additionally, we are dedicated to delivering reliable, affordable energy. To achieve this, PNM developed this Wildfire Mitigation Plan (WMP) and has placed an emphasis on:

- Enhancement of on-the-ground situational awareness (SA).
- Prioritization of vegetation management work.
- Hardening of our electric system.
- Collaborating with stakeholders to seek input on how we can best communicate and alert customers and communities about wildfire and wildfire risk.

This plan will be reviewed annually prior to wildfire season and revised as needed. This WMP provides information on PNM's progress and work to date along with advancement toward our mitigation objectives. The document is available on PNM.com/wildfire-safety.

Some of the changes and advancements to PNM's wildfire risk strategies and program over the past year include the following:

- Change of structure within Vegetation Management (VM) and the Wildfire Group - the positions of Wildfire Manager and Wildfire Program Manager have been filled to help shepherd wildfire strategies and planning forward.
- PSPS Engagement with government and industry entities, the public, and electric utility peers.
- PNM has conducted remotely sensed data collection throughout its HFAs, including the collection of high-resolution imagery and Light Detection and Ranging (LiDAR), which is being used to implement multiple WMP recommendations.
- PNM has created specific and targeted operations and maintenance practices, system hardening programs, VM, and field personnel practices to mitigate wildfire risk.
- PNM has increased SA of escalating fire weather conditions and augmented existing plans to reduce ignition likelihood from system operations and from field work.
- PNM has added a fire classification scheme that will govern response, internal reporting, and external communications during wildfire events.
- PNM continues to capture and analyze outage data to use in developing effective risk reduction strategies.
- PNM has developed a Public Safety Power Shutoff (PSPS) Plan as part of operational mitigation practice. The PSPS will, if initiated, de-energize electrical facilities in extreme wildfire risk areas to reduce the potential of those facilities becoming a wildfire ignition source. The PSPS Plan is available at www.pnm.com/wildfire-safety.
- Engineering testing of various types of equipment.
- Wildfire Prevention and Preparedness Training is required of all field personnel and support (managers and peers).

1.0 Introduction

In recent years, the western United States has seen an increase in damaging wildfire activity. A contributing factor to this increase is climate change. Both climatologists and fire scientists anticipate longer fire seasons and more extreme fire behavior in future years. This new normal will require new coping stratagems. Other important risk factors include human encroachment, historical land management practices, and the health of wildlands and forests.

To address these changing climatic conditions and the associated elevated risks of wildfires, the Public Service Company of New Mexico (PNM) prepared this Wildfire Mitigation Plan (the Plan or WMP). The Plan covers wildfire risk drivers, and programs and strategies to mitigate them.

PNM recognizes that an effective wildfire strategy includes a culture that ranks safety over reliability. PNM has prepared this WMP as part of an organizational philosophy. The key topics include grid design and system hardening, asset management and inspection, Daily Situational Awareness (SA) and forecasting, operational response, vegetation management (VM), and risk-spend efficiency.

WMPs are now required by regulation in several western states, including Utah, Oregon, and California. A Western Energy Coordinating Council (WECC) letter dated May 2019 addressing reliability preparedness outlines higher risk across the Western Interconnection and provides maintenance, planning, operations, and training recommendations in preparation for fire season. The Edison Electric Institute (EEI) and Electric Power Research Institute (EPRI) have both increased their activity regarding wildfire ignition prevention.

This WMP provides details on PNM's current wildfire prevention efforts. It is not intended to be aspirational, nor to address yet-to-be initiated projects or activities. Any forward-looking statements are not a guarantee of future performance or project initiation. Statements and details on PNM wildfire prevention activities are current as of its writing in May of 2024.

1.1 Purpose and Objectives

The WMP summarizes the wildfire risk awareness and mitigation strategies that are part of PNM's fire-safe culture.

The WMP is a living document, changing as plan milestones are met and risk mitigation capabilities grow and change. The WMP serves as a blueprint to help reduce the risk of PNM transmission and distribution (T&D) infrastructure or operations from being the cause of unwanted wildland fire ignitions. The Plan also addresses strategies, technologies, and operating guidelines to enhance grid resiliency and public safety. PNM continues to collect ignition data and review it for trends that could point to new mitigation tactics.

1.2 Overview of PNM

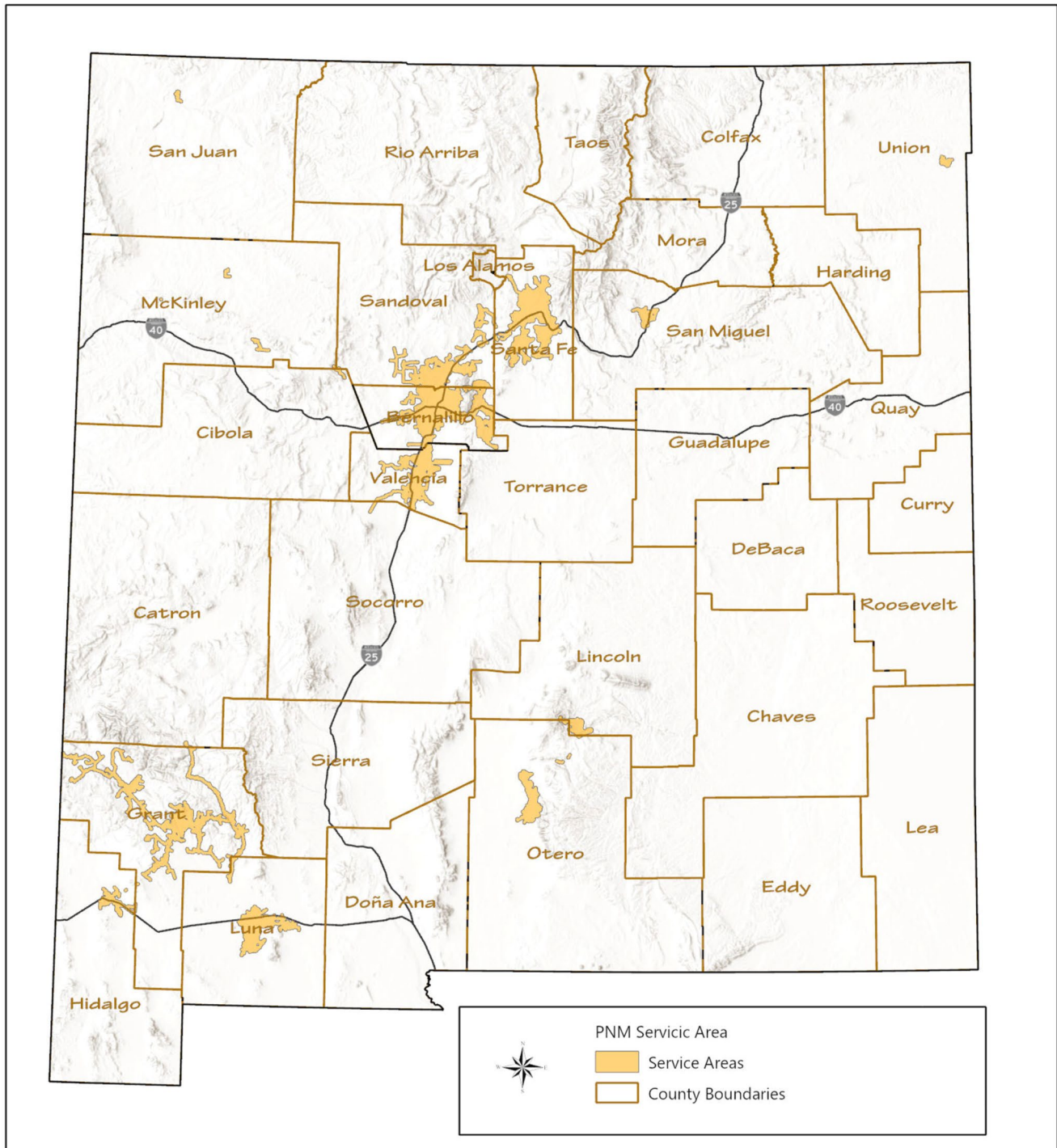
PNM, in operation since 1917, is a subsidiary of PNM Resources Inc., which is an investor-owned holding company headquartered in Albuquerque, New Mexico, engaged in the generation, transmission, and distribution of electricity. PNM is regulated by the Federal Energy Regulatory Commission (FERC) and the Public Regulation Commission (PRC) in New Mexico and the Public Utility Commission (PUC) in Texas. PNM serves 739,000 electric customers via 4,143 miles of powerlines and approximately 75,000 acres

of right-of-way (ROW) easements. Of this, approximately 25,000 acres of ROWs require active VM. This WMP addresses the portion of PNMR's facilities in New Mexico (**Figure 1**).

1.2.1 New Mexico Flora and Geography

New Mexico has mostly hot, semiarid, or semiarid-continental climate regimes. New Mexico contains semiarid shrub- and grass-covered plains, forested mountains, glaciated peaks, woodland- and shrubland-covered hills, lava fields and volcanic plateaus, river floodplains, and arid deserts. Many species of grasses grow in sparsely distributed bunches. Grama grass is typical. Groundcover generally is sparse with broad areas of exposed soils. In eastern New Mexico, the grasslands grade into savanna woodlands or semi-deserts composed of shrubs and trees adapted to survive in areas with little water. Cacti are present in some places. These areas support limited grazing but are generally not moist enough for crop cultivation without irrigation. Riparian areas support cottonwood and willow. Mountains support a complex of conifers, ranging from pinyon-juniper on the lower slopes, ponderosa pine on mid-slopes, and mixed conifers (e.g., white fir, Douglas fir, Engelman spruce and sub alpine fir) at high elevations.

Figure 1. PNM Service Area



2.0 Risk Analysis and Identification of Hazardous Fire Areas

2.1 Service Territory Risk Assessment

PNM continues to assess its wildfire risks and mitigation efforts and apply best industry practices and strategies to further reduce wildfire risks. These assessments and recommendations comprise this WMP.

PNM's risk assessment methodology is consistent with conventional definitions of risk, which usually include an event's probability, and its potential negative consequences or impacts. Data inputs used to determine fire probability include:

- Historical weather (temperature, wind speed/direction, relative humidity)
- Topography
- Types of fuel present
- Fuel moisture content (both dead and live fuels)

Using this information, the consequences of a fire may relate to the number of structures (i.e., homes, businesses, other manufactured structures) or the risk to natural resources that may be impacted by a wildfire.

A landscape level assessment of wildfire potential is essential to understanding wildfire risk. Using GIS, PNM completed an assessment of wildfire risk across its service area to identify locations of highest risk, which are called Hazardous Fire Areas (HFAs) (see **Figure 2**). The HFAs overlap a significant portion of National Forest Lands where PNM has active Special Use Permits and special operating conditions apply. The United States Forest Service (USFS) boundaries are also shown in **Figure 2**. Fire Weather Zones (FWZ) are areas with similar climate, weather, and terrain characteristics. There are 21 FWZs in New Mexico of which PNM's HFAs straddle thirteen. The National Weather Service (NWS) issues Red Flag Warnings (RFW) per FWZ. Detailed maps of each HFA are in Appendix A.

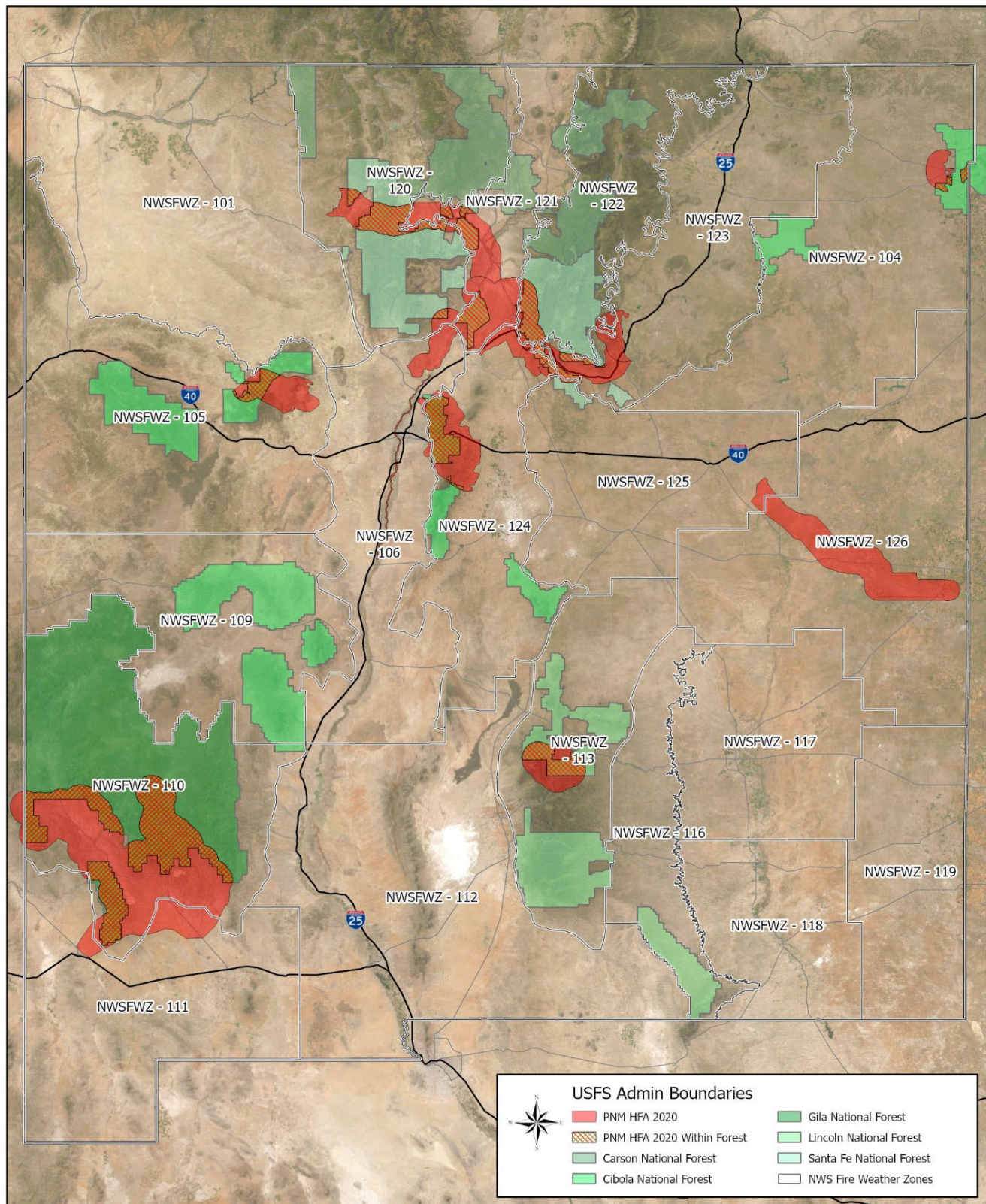
The HFAs are used for various purposes including prioritizing fire hardening activities, enhanced inspection and maintenance activities, fieldwork restrictions during critical fire weather, and making system operation decisions. The PNM HFAs are useful when educating and collaborating with external partners and stakeholders such as abutting electric utilities, and local, state, and federal firefighting agencies.

The HFAs are also used to help guide PNM when siting new facilities such as substations, and communication and relay facilities. These kinds of facilities will not be constructed within an HFA unless the necessity of doing so overrides the ability to choose other non-HFA options. When this is the case, additional mitigation measures will be employed to make them as fire safe as possible.

PNM used a simple process to develop its HFA's based on the publicly available USFS Wildfire Hazard Potential (WHP) dataset, which ranks hazard potential in five classes ranging from Very Low to Very High. Here are the steps that were taken to create PNM's HFA layer:

1. PNM T&D assets were buffered by five miles in GIS creating "Rough HFAs."
2. The Rough HFA was superimposed over the WHP data. Areas of dense Moderate, High, or Very High WHP that fell into the Rough HFA polygon were aggregated or captured into discrete polygons that became HFA areas.

Figure 2. PNM HFAs, USFS Boundaries and Fire Weather Zones



3. In their final format, HFAs were refined so they did not unnecessarily intersect, bisect, or divide feeders. When it was necessary to bisect a feeder, a logical point such as a switch location was chosen.
4. Additionally, historic fire perimeter data from New Mexico state¹ sources were used to inform HFA boundaries.

Table 1 lists the twelve identified PNM HFAs and some of their characteristics. PNM will periodically review HFA boundaries, as necessary. Separate maps of each HFA are found in Appendix A.

Table 1. HFA Names and Characteristics

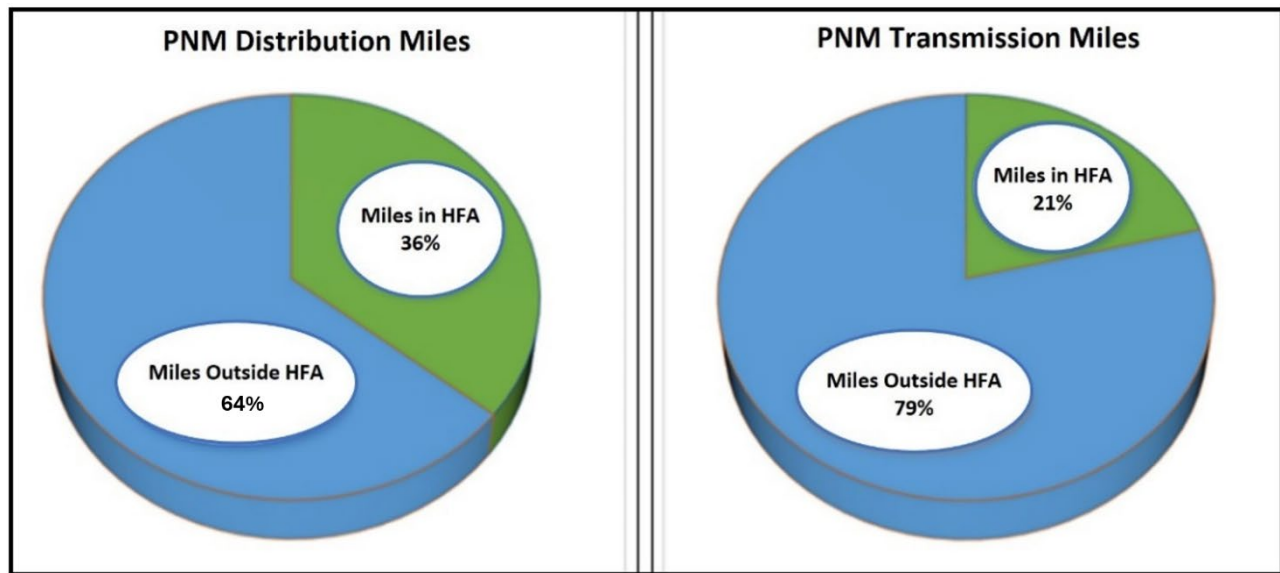
<i>HFA Name</i>	<i>Type of facility</i>	<i>Area (Sq. mi.)</i>	<i>FWZ²</i>	<i>Predictive service area (PSA) (primary)</i>	<i>PNM Division</i>
Bosque ³	T&D	29	NM 106	SW09 South/Central NM Lowlands	Sandoval Albuquerque Valencia
Clayton East	T&D	13	NM 104	SW13 Northeast NM/NW TX	Clayton
Clayton West	T&D	97	NM 104	SW13 Northeast NM/NW TX	Clayton
Fort Sumner 3	Transmission	819	NM 125 & 126	SW13 Northeast NM/NW TX	Transmission
Las Vegas	T&D	135	NM 122 & 123	SW10 Sangre de Christo Mtns	Las Vegas
Mt. Taylor	T&D	298	NM 105	SW07 Northwest NM Mtns	Ambrosia Lake Marquez
Ruidoso	T&D	312	NM 113	SW12 South/Central NM Mountains	Ruidoso
Sandia Mtns	T&D	492	NM 106 & 124	SW11 Central NM Mtns & Plains	East Mountain
Santa Fe	T&D	961	NM 105, 106 & 121	SW10 Sangre de Christo Mtns SW07 Northwest NM Mtns	Santa Fe
Santa Fe East	Transmission	251	NM 124 & 126	SW10 Sangre de Christo Mtns	Santa Fe
Santa Fe North	T&D	704	NM 120 & 121	SW07 Northwest NM Mtns	Santa Fe
Silver City	T&D	2867	NM 110	SW08 White Mtns & Gila Region	Silver City

PNM has begun incorporating its HFAs into its business decision-making process. For example, work restrictions, system operations, fire hardening, engineering, and construction considerations, as discussed in other sections of this WMP, are now being informed by HFA boundaries. PNM has broken out its T&D miles inside and outside of HFAs. **Figure 3** shows the percentages of transmission lines to distribution lines inside and outside of the HFAs. Similar projects may be prioritized by whether they are inside or outside an HFA.

¹ Browse rgis.unm.edu data New Mexico Wildland Fire Perimeters 1911-2014

² From the NWS: *This data set is used to delineate the Fire Weather Zones that are used by NWS in the fire weather forecast program.* These are areas of generally homogenous fire weather. Fire Weather Watches, Red Flag Fire Weather Warnings (RFW) and their attendant alerts are issued by NWS Fire Zone. Knowing which Fire Weather Zone, a particular HFA is coincident with is critical when making operational decisions.

³ The Bosque was included as an HFA due to the proximity of abundant fuel load and human development to PNM facilities. This riparian area is dense with cottonwood trees and adjacent to residential developments.

Figure 3. T&D Miles Inside/Outside HFAs

Given that the HFAs represent areas of highest risk driven largely by hazardous fuel conditions within them, it is reasonable to conclude that the HFA also represents areas where PNM facilities are at highest threat from fires of outside origin (non-powerline ignitions).

In 2022 and 2023, PNM collected remotely sensed data (e.g., LiDAR, high-resolution imagery, etc.) along its T&D lines in most of its HFA areas. This data is being used for multiple purposes, including the prioritization of VM work, detailed inspections, and inventories of PNM assets, etc. Remotely sensed data was not collected across some Pueblo Lands. However, these lines have been patrolled as part of other routine PNM patrols.

2.1.1 Use of Artificial Intelligence

In the Spring of 2024 PNM acquired data from Athena Intelligence™ (Athena) to further inform its Landscape Hazard assessment. Athena™ uses artificial intelligence and machine learning to combine diverse publicly available and validated datasets to create “synthetic data.” Some examples of the data Athena™ combines are Wildfire Hazard Potential, Census Block data, USFS fuel data, terrain data, and so forth. **Table 2** lists attributes and descriptions for use with Athena™-derived GIS data.

Table 2. Athena-Derived Attributes and Descriptions

Attribute	Description
County	County where the profile polygon exists.
BLK	Census Block identification.
WUI Class	Designation of housing density and its proximity to wildland fuels.
BLK_ID	Combination of the three above.
Conditional Risk	A ranking of Very Low to Very High that describes an areas' potential to host a wildfire.
Conditional Risk Score	Ranges from 1-16.
Locational Risk Score	Ranges from 2-34.
Combined Risk	Six class ranking from Very Low to Very High that combines Conditional and Probability scores.
Burn Probability	Ranges from VL to VH and describes the probability of a wildfire's occurrence at a Block.
Risk Score	Range from 2-10. Combination of Conditional Risk and Probability Risk.
Risk Units	Ranges from 1-48.

2.1.2 HFA Planning and Maintenance

Short-term

1. HFA boundaries are being used to prioritize immediate work.
2. HFAs are being used to prioritize enhanced inspection and maintenance cycles.
3. Planning and budgeting continue to be sought to forecast future work in HFA areas.
4. \$5.5 million has been set aside for VM within the Gila NF. This work started in 2023.
5. HFAs are being used to help focus situational awareness (SA) of fire weather in upcoming fire seasons.

Mid-term

The WMP is a living document and is reviewed annually to incorporate changes and updates. HFA layers are updated as needed.

Long-term

PNM is researching various mountaintop camera options, costs to operate and locations to place them. PNM is considering fully funding or partnering with agencies for meteorological stations and fire cameras in its HFAs.

2.2 PNM's Geographic Information System HFA Layer

PNM's Drafting and Geographic Information System Department (DGIS) manages the GIS HFA layer. **Table 3** provides a data dictionary for the shapefile. Each HFA is attributed with the information contained in these cells. **Table 1**, above, provides a quick reference look at each HFA polygon and how it interacts with other spatial data of interest.

Table 3. HFA GIS Shapefile Attributes and Descriptions

Attribute	Description
HFA Name	Each HFA has a unique name. In most cases the name corresponds to the general geographic area or a prominent landmark nearby.
Utility Discipline	Utility Discipline describes the general voltage class(es) found in the HFA. The values available are Transmission, Distribution, or T&D.
County (Warning Area)	County Warning Areas (CWA) boundaries are used to delineate the area of responsibility for each Weather Forecast Office. From the NWS: <i>"The group of counties for which an NWS Forecast Office is responsible for issuing warnings."</i>
NWS Fire Zone	From the NWS: <i>This data set is used to delineate the FWZ that are used by NWS in the fire weather forecast program.</i> These are areas of homogenous fire weather. FWW, RFW and their attendant alerts are issued by NWS Fire Zone. Knowing which FWZ, a particular HFA is coincident with is critical when making operational decisions.
PSA	PSA describes 7-day significant fire potential in pre-defined areas of homogenous fire risk. It is issued by the Southwest Coordination Center about 10:00 MT daily during "fire season." https://fsapps.nwcg.gov/psp/npsg/download.html
Acres	GIS calculated acres for each HFA polygon.

2.3 Substation Assessment

Although equipment fires in substations are rare, they are typically high consequence events. To determine which substations were at highest risk of an internal equipment fire spreading and causing damage outside its perimeter, an on-site assessment was performed on thirty-eight substations throughout New Mexico.

In general, the assessment looked at the configuration of the substation itself, its siting on the landscape relative to wildland fuels, and the proximity of any residential or other development at risk. GIS was used to determine which PNM substations were within an HFA or within a 500-foot buffer of an HFA. Of the original fifty-six candidate substations, aerial imagery was used to eliminate eighteen substations based on location and proximity to wildland fuels, and assets at risk (development). Site visits were performed on the remaining thirty-eight substations. Each substation visited was assessed and risks mitigated. Evaluation of conditions at all substations will be an ongoing effort.

Response from appropriately trained personnel equipped with suppression resources may be delayed or unavailable. Having a pre-fire response plan that includes appropriately equipped and trained first responders could be important if there is a catastrophic equipment failure resulting in a fire. Proper vegetation maintenance inside and outside its perimeter, and good housekeeping routines within the confines of a substation help to minimize the risk of an equipment fire spreading to surrounding areas.

The most at-risk substations receive regular vegetation maintenance, containment for exposed equipment such as transformers and capacitors, and solid, non-combustible fencing where there is a danger of fire spreading through the fence and outside the perimeter. Security fencing helps prevent vandalism and its potential to cause fires.

Table 4. Description of Select Attributes

Perimeter fencing	Was the fencing solid, chain link, or did it have slats.
Development proximity	How far away from the substation were homes, businesses or other improvements that could be damaged by fire.
Landscape & irrigation	Presence of landscape and irrigation outside the fence.
Fuel reduction	Distance of any fuel reduction from the perimeter fence.
Fuel type in proximity	Type of fuel in general proximity to the substation. An indicator for fire ignition and fire intensity.
Equipment containment	Transformers with / without blast walls, capacitors exposed or contained.
Substation profile	Equipment at ground level or elevated above. Elevated would indicate higher chance of equipment fire escaping.
Fire Water score	Whether or not water for fire suppression was available.
Final Tally	Total score of all attributes.
Exposure/Encroach	Indicates presence of, and urgency of, remediation for any vegetation or timber posing a threat.

Table 5. Substation Assessment Attributes

Substation name	Fuel type in proximity
	Brush - 5
	Grass - 3
Voltage class	No vegetation - 0
Perimeter dimensions	Equipment containment
	Transformer without blast wall - 5
	Transformer with blast wall - 0
Access road	Capacitor bank exposed - 5
Paved	Capacitor bank contained - 0
Gravel	
Graded dirt	Substation profile
	high profile - 5
Suitable for safe refuge	low profile - 0
Yes	
No	Is firefighting water available?
Limited	No - 5
Perimeter fence material	Yes, Inside fence - 2
Open chain link - 5	yes, outside fence - 0
Chain link w/slats - 3	
Concrete block - 0	Exposure/encroachment Issue
	5 - Immediate need, <u>URGENT</u>
Development in proximity regardless of fencing or vegetation	4 - Delayed
Within 100' of perimeter - 10	2 - Before fire season / wind event
Beyond 100' of perimeter - 0	1 - Perform during scheduled maintenance
Landscaping / Irrigation outside fence	TOTAL SCORE:
No - 5	<input type="text"/>
Yes - 0	

3.0 Overview of Preventive Programs and Strategies

3.1 Remotely Sensed Data Collection

In 2022 and 2023, remotely sensed data, including LiDAR and high-resolution imagery, were collected via helicopter for 98 percent of all overhead T&D lines in the HFAs; the exception being a few line segments in Pueblos over which PNM was not able to get permission to fly. This data is an invaluable component of several of PNM's wildfire risk mitigation efforts, i.e., it is being cost-effectively applied to support multiple use cases. For example, the data is currently being used to support functions including:

- VM analyses and reports
- Assessment of facility conditions, inventorying, and maintenance
- Assessment of facilities susceptible to wildlife-caused outages
- Engineering
- Asset retrofitting, refurbishment, and rebuilding

Some of the activities that are leveraging the remotely sensed data are described more fully in the sections that follow.

PNM has utilized the findings from the initial remotely sensed data collection to inform and schedule additional data collection efforts. Continued inspections, be they cyclical or on an as-needed basis, continue to be evaluated.

3.2 Vegetation Management (VM)

3.2.1 VM Program Overview

PNM's VM program is designed to promote the safe and reliable operation of its lines systemwide, and to comply with the requirements of Section 218 of the National Electrical Safety Code (NESC). The program is headed by an Associate Director of VM & Wildfire. Day-to-day operations are supervised by a Vegetation Program Manager and a team of foresters who oversee the work of tree crews responsible for pruning and clearing vegetation near PNM's T&D facilities; PNM currently relies on contracted tree crews for field operations.

The VM Department is responsible for inspecting, patrolling, and managing vegetation. PNM follows industry-standard utility VM practices and techniques as set forth in the American National Standard Institute's A-300 standard, including natural directional pruning to promote regrowth of the tree away from powerlines. PNM has species-dependent clearance specifications that are common in the industry, including a three-year new growth allowance between maintenance cycles. PNM uses vegetation-related outage data, patrol results, and customer requests to inform its workflow. Specific components and attributes of the VM program are described more fully below.

Transmission

Lines that fall under the North American Electric Reliability Corporation's (NERC) Reliability Standard FAC-003-4 (200 kV and greater) are patrolled annually with no longer than 18 months in between patrols. The remainder of the transmission system is patrolled on an as-needed basis with a focus on areas known to have rapid vegetation growth due to species, site conditions, and proximity to water as in riparian areas. Tree crews perform VM work along lines that fall under NERC jurisdiction on a five-year

cycle to maintain clearances and control undesirable vegetation. VM work on lines outside of NERC jurisdiction occurs on an as-needed basis as determined by patrol information, tree-related outages, work requests and/or field observations.

From 2014 through 2018, PNM completed a project to clear incompatible tree species along the entire legal width of the ROW of all NERC lines. The project encompassed nearly 1,100 miles of transmission lines or approximately one-third of PNM's transmission system. Most of these lines were in the northern portion of New Mexico and traverse multiple HFAs.

These lines are now being maintained on a five-year cycle leveraging Integrated Vegetation Management (IVM) techniques to control re-establishment of incompatible species. This is a long-term, sustainable approach that reclaims the ROW and effectively manages the future vegetation workload.

The VM department provides regular updates to PNM's internal compliance department regarding NERC compliance efforts. PNM has participated in multiple NERC Regional Entity, WECC, compliance audits and has been found to be compliant with the specified requirements.

Distribution

Systemwide, VM work is performed according to a schedule determined at the beginning of each year. The schedule is created based upon available vegetation-related outage data, customer requests and observed field conditions, and focuses on the three-phase portions of circuits. Other portions of the circuits, such as secondary lines, are addressed on an as-needed basis or during capital work.

Adjustments to the distribution VM work scope may be made when performing work in the HFAs. For example, all parts of scheduled circuits would be worked rather than just the three-phase portions.

Dedicated patrols are performed on circuits identified for capital work to document capital maintenance items in need of repair and to identify VM work to be completed prior to the capital maintenance work commencing.

VM Metrics for T&D

Currently, the VM Department tracks contractor performance metrics, including the miles of VM preventive maintenance and reactive maintenance work completed for both T&D assets. Costs per mile are tracked and available for analysis. PNM captures data on its annual plan completion and annual inspections for transmission vegetation management, which is used to demonstrate compliance with NERC standard FAC-003-4. Other workload and work management information is collected and analyzed in a GIS-enabled software system.

Enhanced Inspections/Clearing

Enhanced vegetation inspections and clearing may occur within PNM's HFAs in accordance with results derived from remotely sensed data collection efforts including the following: 1) the collection of data in 2014 on all lines under NERC jurisdiction prior to the ROW-clearing project; and 2) the HFA-wide effort that captured remotely sensed data for almost all T&D lines in PNM's HFAs.

Requirements for Contracted Tree Crews

PNM's VM contractors are required to have a well-developed wildfire prevention program that includes annual training for all employees. They are also required to have firefighting tools on all their trucks and to stage their tools at each job site, so they are ready to use at a moment's notice to suppress unwanted ignitions. PNM foresters make regular field visits to monitor work by tree crews for compliance; job safety tailboard sessions are routinely assessed during site visits. PNM's RFW communication protocol includes VM contractors.

3.2.2 VM Plan Advancement for Wildfire Risk Mitigation

As part of PNM's ongoing efforts to enhance its VM activities in support of the goals of the WMP, PNM has:

- Collected remotely sensed data (i.e., LiDAR, high-resolution imagery) for nearly all of PNM's T&D lines within the HFAs and analyzed the data to assess the potential need for VM work.
- Developed a Formal Utility Tree Risk Assessment (UTRA) policy.
- Created SA capabilities for various activities that include escalating weather mitigation matrices/Created SA capabilities for various activities that include escalating weather mitigation matrices.
- Annually performed vegetation inspections in HFAs for VM needs to mitigate wildfire ignition potential.
- Tracked VM metrics to drive and inform work needed.
- Increased data sharing across business units to improve efficiencies and reduce risks through better collaboration.

3.3 Inspection, Inventorying and Maintenance of Overhead Lines

PNM has implemented a multifaceted approach to the inspection and maintenance of overhead T&D facilities in the HFAs consisting of the following key activities:

- Virtual Inspections: Virtual visual inspection of most PNM's overhead T&D facilities within the HFAs is complete. This virtual inspection leveraged the high-resolution imagery captured during the remotely sensed data-collection effort mentioned throughout this section.
- Planning for Ongoing Cyclic Inspections: In parallel with the above-mentioned virtual inspections, PNM has been assessing its ongoing needs for diverse types of cyclic inspections of overhead T&D lines in the HFAs and analyzing budgetary requirements. It is anticipated that some of these cyclic inspections will be initiated for lines in the HFAs and that the overall inspection program will evolve and advance as more types of inspections are integrated into the program over the next couple of years.
- Asset Inventory: PNM also virtually inventoried the assets subject to the above-mentioned virtual visual inspections. This inventory data will be integrated into PNM's GIS and will be invaluable as PNM moves forward with other wildfire ignition mitigation efforts (e.g., responding to equipment failures, mitigation of wildlife caused issues, retrofitting and/or replacing expulsive equipment, and more). This information is providing PNM with the ability to efficiently perform many of its other planned wildfire ignition risk mitigation activities such as identifying equipment poles and other pole and span configurations that might need some form of mitigation for

ignition risks, retrofitting existing lines, prioritizing lines approaching end-of-life for rebuilding and/or refurbishment, etc.

- Aerial Patrols of NERC Transmission Lines: All transmission lines within the HFAs that are under NERC jurisdiction are aerially patrolled annually to identify conditions warranting mitigation.
- Asset Inspections During VM Patrols: VM inspectors record asset damage and report it to the local business unit when damage is identified.
- Inspection Data Collection System: PNM has developed an enhanced system for T&D inspection and maintenance data collection and management. It has been implemented for transmission and will also be implemented for distribution. This GIS-based platform enables the collection, viewing and reporting of both virtual and boots-on-the-ground inspection data and incorporates attributes that will aid PNM's wildfire risk mitigation efforts. The data from the system also integrates with the dashboards mentioned earlier in this section.
- Corrective Maintenance: PNM performs corrective maintenance based on the findings of inspections of overhead line facilities in its HFAs within two broad categories of response times: Priority 1) inspection findings that represent imminent safety, wildfire ignition, or reliability threats are dispatched to the relevant service centers for immediate mitigation, and these items are typically addressed within 24 hours, and Priority 2) depending on their severity, all other findings are addressed during scheduled maintenance or may be monitored during subsequent inspections.

3.4 Overhead Power Delivery Infrastructure Advancements

PNM designs, constructs, and retrofits its facilities to meet customer and utility needs in a safe and reliable manner, and in alignment with the requirements of the NESC provisions for Grade B construction and other applicable standards. For existing and new facilities within its HFAs, PNM has implemented and/or is in the process of implementing several enhancements that will aid its efforts to mitigate wildfire ignition risks associated with its overhead lines. In addition, PNM actively monitors research and development (R&D) activities, innovative technologies, and relevant literature. PNM also participates in industry working groups and associations to keep abreast of best practices. Summaries of these efforts are provided below.

3.4.1 Line Design, Construction, Retrofitting and Operating Enhancements for HFAs

Summaries of line design, construction, retrofitting and operating enhancements PNM has completed, is implementing, and/or is investigating are provided below.

Communications Infrastructure and Electrical Devices

- Communications Infrastructure: PNM is upgrading, expanding, and hardening communications infrastructure in its HFAs. This infrastructure will give PNM the ability to replace manually operated equipment with SCADA connected and remotely operable equipment; utilize more advanced and sensitive devices; and integrate sensors for monitoring line and/or environmental conditions thereby improving SA, etc.
- Capacitor Banks: New installations and replacements of capacitor banks are being equipped with SCADA communications to enable the sending of real-time data back to PNM's Distribution Operations Center (DOC). A feature included in the bank is neutral current sensing which can detect imbalances that can be caused by a blown fuse, a bad capacitor can or a stuck switch. These problems can cause a fire hazard if left untreated, and a neutral sensor can indicate a

problem where the capacitor bank needs to be inspected. These issues otherwise go undetected until an employee inspects the capacitor for another reason.

- Reclosers, Relays and Fault Locating Sensors: PNM is evaluating a variety of advanced SCADA-connected reclosers, relays and fault sensor technologies for possible implementation in HFAs both for new construction and as replacements for existing equipment that is not remotely operable/adjustable (e.g., older reclosers).
- Switches: PNM's current standards for new switches include interrupters that are appropriate for use in its HFAs. PNM is considering replacing older switches with air gaps in the HFAs. PNM is also increasing its use of SCADA connected switches which will assist with troubleshooting, and provide more flexibility for sectionalizing, etc.
- Fuses and Lightning Arresters: PNM is replacing expulsive fuses and lightning arresters in its HFAs with non-expulsive alternatives where prescribed; replacement activities will be ongoing for several years. In addition, a pilot project has been initiated to evaluate the use of devices that are akin to mini-reclosers that can be installed in cutouts as a replacement for conventional fuses.
- Enhanced Protection Schemes and Protection Coordination: PNM is actively working on efforts to enhance the coordination of system protection devices and to establish guidelines for settings to be applied in HFAs during fire season and under Red Flag conditions.
- Transformers with Internal Fault Detectors: PNM has developed an approved specification for transformers with Internal Fault Detectors (IFD). IFDs help to quickly identify problems with transformers and thereby lessen the chances of closing in on a faulted transformer and potentially causing an arc, fire, or other issue. Implementation has been slow due to supply chain issues beyond PNM's control. New transformer designs include IFDs, and all transformers are expected to have new designs before the implementation date of DOE's new efficiency standards (which is currently set at 2027).
- Fault Protection for Transformers: PNM is implementing the use of completely self-protected transformers (CSPs) for single phase applications in certain portions of its HFAs. CSPs eliminate the use of cutout fuses which, in turn, reduces the likelihood of sparks being generated during operations. In other areas, fuses used on conventional transformers are being replaced with non-expulsive fuses as stated above.
- Covering for Wire Jumpers: PNM has installed covered wires for all equipment jumpers for some time. PNM is researching if wire to wire jumpers should also be covered and if replacing or upgrading bare wire jumpers to covered wires makes sense in HFAs.

Wildlife Protection

Industry data shows that wildlife contacts with energized power delivery facilities are potential sources of ignitions. PNM's Avian Protection Plan (APP) addresses all ten of the Avian Power Line Interaction Committee and U.S. Fish and Wildlife Service (APLIC and USFWS 2005) recommended APP components. PNM regularly updates the APP and actively implements its provisions. The APP includes elements that reduce existing and future electrocution (and ignition) risks through mitigation and wildlife-friendly construction practices. These strategies revolve around the principle of providing adequate spacing for energized and grounded components.

PNM has avian friendly construction design standards to mitigate risk of future wildlife electrocution. These standards provide wildlife-friendly clearances that protect wildlife that might encounter energized

conductors on a pole. Power equipment on avian friendly poles is installed with wildlife protection. PNM's preventive wildlife protection program applies to new construction in habitat areas.

In addition, PNM actively mitigates wildlife electrocution risk on existing infrastructure by installing protective insulation on high-risk poles. Products used to mitigate ("retrofit") in-service facilities include conductor covers, insulated jumper wires, arrester caps, cut out covers, bushing covers, etc. Mitigation products protect not only birds, but climbing mammals and reptiles (e.g., squirrels, raccoons, snakes) that are susceptible to electrocution. PNM prefers to retrofit susceptible equipment when other work is being performed on a line or structure; this practice increases the scale of mitigation that can be funded by available budgets.

When wildlife electrocution risk is mitigated, wildlife-caused ignition risk is concurrently reduced. Although much of PNM's retrofitting is opportunistic (i.e., completed along with other maintenance activities), PNM actively mitigates areas where wildlife electrocutions have negatively impacted reliability. PNM is currently planning an aggressive approach toward wildfire mitigation within HFAs with the goal of reducing the wildlife-caused ignition risk. Through a study completed in 2023, PNM is prioritizing specific lines and structures within HFAs for mitigation. The study results will be used to develop a granular wildfire mitigation plan that will reduce wildlife electrocution risk and wildlife-caused ignition risk within HFAs.

Poles, Conductors, Crossarms and Hardware

- Poles: PNM is evaluating the potential for using taller poles to lower the risk of wire contacts with vegetation, using higher class poles with larger diameters to increase resiliency and offset potential loss of strength caused by charring, integrating alternatives to wood poles (e.g., steel, fiberglass, etc.) into its standards for HFAs, and whether application of fire retardants to its wood poles could be advantageous in certain areas. PNM's Distribution Engineering Department is developing a design document with pole material, pole height, pole class, and fire-retardant recommendations.
- Covered Wire/Tree Wire: There are advantages and disadvantages to using covered wire/tree wire. PNM is exploring the possibility of using these wire types in forested areas or tight ROWs to mitigate the risk of faults and the associated ignition risks.
- Span Lengths: PNM is revising its ruling spans for construction in its HFAs. Reducing the maximum pole to pole span distance in HFAs to reduce wire sag, wire blow-out, and wire movement will help to mitigate the potential for unintentional contact between conductors, vegetation, or other obstructions thereby reducing ignition risks.
- Crossarms: PNM standards have shifted to using fiberglass crossarms for all new installations and replacements. This shift will help to eliminate the risks of leakage current igniting crossarm fires. Further, fiberglass crossarms are not subject to decay which can contribute to deterioration of the upper surfaces of wood crossarms that cannot be detected from ground-based inspections.
Primary Connectors: PNM's current standards for connectors are appropriate for HFAs. However, some substandard connectors (e.g., hotline clamps) that can cause arcing/sparking if they loosen or degrade are still in service. When legacy, substandard connectors are identified through inspections they are being replaced.

Additional Fire Prevention Measures

PNM is upgrading lines in its HFAs that were built to Rural Electric Association (REA) standards to be consistent with PNM's current standards.

3.4.2 Industry R&D, Best Practices, and Continuous Improvement

As part of its commitment to continuous improvement, PNM monitors industry research and related literature, as well as information from the industry on state-of-the-art fire-safe materials and equipment, best practices for construction and design processes, and engineering and tech solutions. For example, PNM attends in-person seminars and webinars hosted by WECC, EEI, and EPRI. These industry-specific organizations are composed of technical working groups, and impart some of the latest information, testing programs, and lessons learned to their participants. PNM also references the Cal Fire Powerline Fire Prevention Field Guide for guidance on best practices.⁴

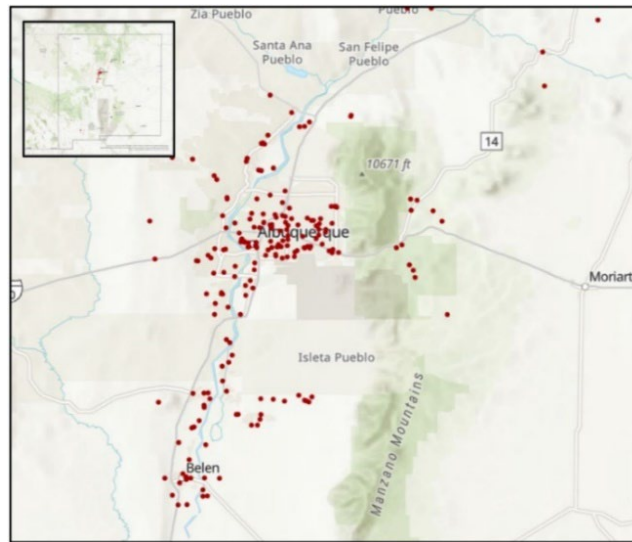
3.5 Leveraging Outage Data for Ignition Management

PNM's existing outage data was used to map the locations of outages and to help validate the Service Territory Risk Assessment section of the WMP and refine the demarcation of HFAs. As an example, the Bosque was known locally to be an area of wildfire concern though it was not specifically highlighted in the USFS WHP data. Mapping outage data (see **Figure 5**) substantiated local knowledge and caused the Bosque to be included as an HFA.

In 2023, PNM added a new data collection field to its OMS to allow more specific ignition data attributes which included evidence of heat, type of equipment involved, and root cause of failure. These enhancements will enable better filtering and analysis of outage records and development of refined reports in support of fire-prevention efforts. Knowing when and where ignitions or near misses are occurring will help PNM enhance its understanding of potential causes of ignitions. The OMS data also includes information such as outage ID, outage start/restore times, duration, customers affected, interrupting device, latitude, longitude, feeder, division, and operator comments.

⁴ https://www.osfm.fire.ca.gov/media/11015/2020-power-line-fire-prevention-field-guide_20200818.pdf

Figure 4. Using Outage Data with Mention of Fire for HFA Identification



3.6 Public Safety Power Shutoff (PSPS)

This WMP focuses on SA, field personnel safety practices and operational wildfire mitigation strategies to prevent the accidental ignition of wildfires. As part of PNM’s operational mitigation practices, a Public Safety Power Shutoff (PSPS) Plan has been developed to proactively de-energize electrical facilities in identified areas of extreme wildfire risk to reduce the potential of those electrical facilities becoming a wildfire ignition source or contributing to the spread of wildfires. The PSPS Plan identifies the relevant considerations, process flow and implementation protocol before, during and after a PSPS event. The PSPS Plan will be reviewed annually and updated as needed before the next wildfire season starts, which can vary throughout New Mexico, and is generally considered to extend from April 1 through September 30 of each year. While fire risk is heightened during certain times of the year, fire potential and its monitoring continues year-round.

The Key Objectives of the PSPS Plan include:

- **Safety:** Ensure the safety of the public and PNM employees, contractors, and Mutual Assistance employees.
- **Restoration Time:** Minimize the duration of an outage, with safety as the primary focus.
- **Mitigate consequences:** Provide customer support to mitigate the impact of an outage.
- **Information:** Provide accurate, timely, meaningful information to our customers, our employees, and other stakeholders.
- **Resources:** Effectively manage our human, equipment, material, and information resources to minimize restoration time and maximize productivity and performance.

4.0 Escalating Fire Weather and Operational Strategies

4.1 Annual Fire Prevention and Fire Safety Training

PNM has developed a training program geared toward fire prevention and safety, its Wildfire Mitigation Program, and the HFAs. Included in the training are how the HFAs were developed, what they are used for, how they inform ignition mitigations, and basic training on fire weather conditions, including RFWs. The training also covers basic fire behavior and safety when responding to a wildfire.

4.2 Daily Situational Awareness

PNM receives a Daily SA forecast report prepared by an external contractor and is emailed to a distribution list of targeted PNM personnel. The “Daily SA” as it is called, assigns an Operating Condition of Normal, Elevated, or Extreme to each PNM HFA each day using publicly available data.

PNM has refined how the raw data is interpolated to meet its risk avoidance objectives. Also contained in the Daily SA is information associating PNM HFAs to RAWs and NWS FWZs (see **Figure 6**).

The Operating Conditions inform mitigation efforts for field work such as cutting, grinding, welding and other similar activities. As burning conditions become more critical, mitigations are increased (see **Table 6**).

Figure 5. Sample Daily SA Report

<i>HFA</i>	<i>Operating Condition</i>	<i>RAWS Station</i>	<i>NWS FWZ</i>	Link to WMP Operating Condition section; scroll to appropriate HFA for appropriate work restrictions
Santa Fe North	Normal	Coyote-290202	NM102	
Bosque	Normal	Sandia Lakes-290706	NM106	
Santa Fe	Normal	Santa Fe Watershed-290901	NM102	
Clayton East/West	Extreme	Mills Canyon 291101	NM104	
Santa Fe East	Elevated	Pecos-291202	NM103	
Las Vegas	Elevated	Pecos-291202	NM103	
Mt. Taylor	Normal	Grants-291302	NM105	
Sandia Mts	Normal	Sandia Lab-291408	NM107	
Ft. Sumner	Normal	Melrose Range 291901	NM108	
Silver City	Normal	Gila Center-292011	NM110	
Ruidoso	Normal	Smokey Bear-292203	NM113	

4.3 Escalating Work Restriction Matrices

PNM requires that mitigation measures from the following matrices be used for all at-risk activities in HFAs or in other areas covered in flammable vegetation. Each PNM Division has its own matrix and has

made mitigation recommendations based upon its own field tasks. **Table 6** below identifies the Mitigation Levels used in Matrices 1 through 12, and it provides details on the mitigation levels required for each operating condition in each HFA.

When working on federal lands [USFS, Bureau of Land Management (BLM)⁵, etc.] additional mitigations may be required by the agency including:

- Water buffalos
- Larger (20 lb.) fire extinguishers
- Other mitigation measures as stipulated by the agency.

Table 6. Mitigation Level Table

Mitigation Level A	Mitigation Level B	Mitigation Level C	Special Circumstances
<ol style="list-style-type: none"> 1. Documented Safety Tailboard. 2. At minimum one fire suppression hand tool within one hundred feet of job site or immediately available when the work is mobile. 3. Documented person to call 9-1-1 and provide location and access route for emergency crews. 4. Strict adherence to PNM Smoking Policy. 	<ol style="list-style-type: none"> 1. Work will stop and a new Safety Tailboard will be completed any time fire risk increases, i.e., location or work activity changes, RFW is issued, significant increase in wind at the work site, etc. 2. At minimum two fire suppression hand tool within twenty-five feet of job site for a crew with multiple persons. 3. At a minimum, one PNM approved fire extinguisher or one filled 5 -gallon backpack water pump within twenty-five feet of job site or immediately available when work is not stationary. 4. Documented working Fire Watch person(s) as appropriate on Safety Tailboard. 5. Documented person to call 911 and provide location and access route for emergency crews. 6. Strict adherence to PNM Smoking Policy. 	<ol style="list-style-type: none"> 1. Work will stop and a new Safety Tailboard will be completed any time fire risk increases, i.e., location or work activity changes, RFW is issued, significant increase in wind at the work site, etc. 2. At a minimum, one fire suppression hand-tool per crew member at job site. 3. At a minimum, two PNM approved fire extinguishers and two filled five-gallon backpack water pumps at the job site or readily accessible on work that is not stationary, i.e., access road maintenance. 4. Designate a working Fire Watch person(s), and document on Safety Tailboard. 5. Check all work sites for hot spots or smoldering embers for 45 minutes after At-Risk activities have ceased. 6. Documented person to call 911 and provide location and access route for emergency crews. 7. Strict adherence to PNM Smoking Policy. 	<ol style="list-style-type: none"> 1. Essential Work that requires a documented Supervisors' approval for work approval and mitigation determination. Typically, this work would be deferred to days with less critical fire risk. 2. Mitigations will be determined case by case. 3. Mitigations may not be possible for some activities, and their continuance should be restricted.

⁵ BLM Instruction Memorandum IM 2022-036, Standard Fire Prevention and Control Stipulations for BLM Electric Transmission and Distribution Right-of-Way Grants.

Metro Line Mitigation Matrix

Metro		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C Water Buffalo
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	C
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	B	C
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	B	B

Santa Fe, Las Vegas, Clayton Line Matrix

Santa Fe, Las Vegas, Clayton		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C Water Buffalo
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	C
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	B	C
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	B	B

Alamogordo Line Matrix

Alamogordo		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C Water Buffalo
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	C
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	B	C
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	B	B

Ruidoso Line Matrix

Ruidoso		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C Water Buffalo
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	C
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	B	C
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	B	B

Silver City Line Matrix

Silver City		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C Water Buffalo (specify)
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/ replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	B
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	A	C
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	A	B

Deming Line Matrix

Deming		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C Water Buffalo
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/ replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	C
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	B	C
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	B	B

Fleet Matrix

Fleet		Operating condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C Water Buffalo (specify)
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/ replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	B
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	C	C	SC
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	A	B

Substation Matrix

Substation		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C Water Buffalo (specify)
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/ replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	C
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	B	C
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	B	B

Relay / Comms Matrix

Relay / Comms		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C Water Buffalo (specify)
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/ replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	C
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	B	C
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	B	B

Meter Matrix

Meter Dept		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/ vegetation contact.	A	A No parking on dry grass	Special Circumstances
Construction/ maintenance of electric facilities	Equipment maintenance or replacement. (Meter maint / replacement, etc.)	A	B	C
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	A	C

Transmission Matrix

Transmission		Operating Condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances
Heavy Equipment Use / Ground Disturbing Work	Dozers, graders, skid steers, trenchers, etc. All road maintenance, water bars, pole hole drilling, etc. Includes all blasting.	A	B	C
Construction and maintenance of electric facilities	Equipment maintenance or replacement. (Cross arms, pole replacement, reconductor, substation, transformers, relays, meter maint/replacement, etc.)	A	B	C
Vegetation Management	ROW vegetation clearing	A	B	C
Cutting, Grinding, Welding	All types of spark-producing cutting, grinding, or welding work.	A	A	C
Internal Combustion Engine Use	Use of equipment with combustion engines not covered elsewhere. Includes ATV, chainsaw, generator, compressor, etc.	A	B	B

Generic Driving Matrix

Generic Driving (traversing HFAs without any field work)		Operating condition		
General Activity	Specific Description	Normal	Elevated	Extreme / Red Flag
Vehicle Operations	Vehicle travel on & off road. With no vehicle / vegetation contact	A	A	A
	Travel off-road or on unmaintained road with vehicle/vegetation contact.	A	A No parking on dry grass	Special Circumstances

4.3.1 Fire Season at PNM

In general, fire season begins in the spring when the landscape becomes receptive to ignitions. As fire season draws on through the summer, burning conditions become more critical. The wildland fire agencies (USFS, BLM, etc.) use fire season dates to determine staffing and operational levels. For PNM's operating purposes, the typical fire season dates are April 1 through September 30, though they may be adjusted, as necessary.

4.3.2 Red Flag Warning Protocol

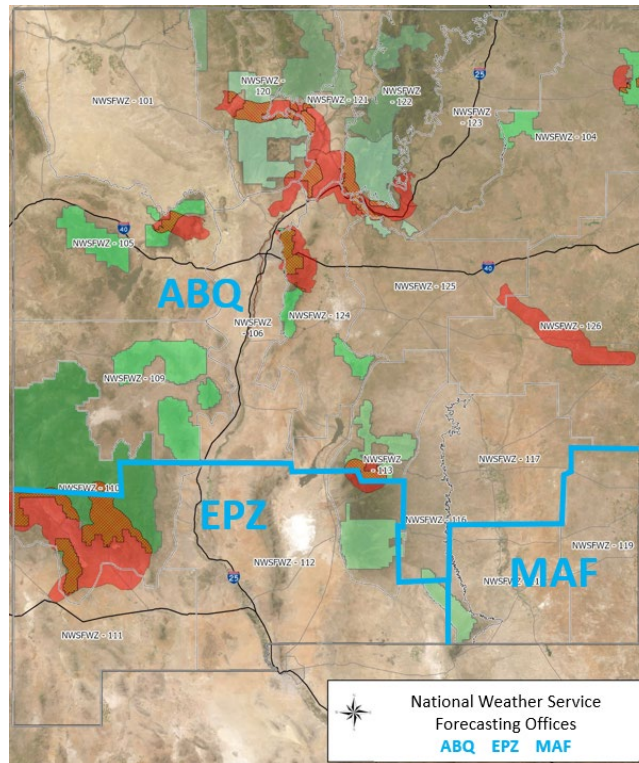
RFW is issued by the NWS when wildland fuel and weather combine to produce critical burning conditions. RFWs are issued for FWZs for a given time. RFWs provide PNM critical SA useful for making operational decisions. Typically, only essential field work will continue during an RFW. Some system settings are adjusted during an RFW; these procedures are documented by PNM's Transmission and Distribution Departments.

Criteria for RFW issuance is left to the discretion of each NWS Forecasting Office; in general, when the following conditions are expected, a RFW is issued:

- Wind speeds above 25 mph
- Relative humidity below 15 percent
- 10-hour fuel moistures at or below 8 percent

PNM serves areas covered by two NWS Forecasting Offices (see **Figure 7**); one in Albuquerque and one in El Paso, Texas. The southeastern corner of New Mexico is covered by Midland; however, there is no PNM service area in the Midland Forecasting Office area of influence.

Figure 6. NWS Forecasting Offices



As mentioned above, RFWs affect both system settings and field operations. To ensure that all affected PNM personnel are aware that an RFW has been issued, an email alerting process has been created that uses the RFW alerts from Indji Watch and functionality from Microsoft to “push” RFW alerts to customized Distribution Lists. In this way, receipt by affected personnel is ensured. An example of the alert is shown below.

US NWS Red Flag Warning

Indji has detected a **Red Flag Warning** affecting Las Vegas, Santa Fe, Valencia, East Mountain, Albuquerque, Sandoval, PNM Transmission.

Summary: Red Flag Warning issued April 20 at 3:04PM MDT until April 20 at 8:00PM MDT by NWS Albuquerque NM

Description: The National Weather Service in Albuquerque has issued a Fire Weather Watch...which is in effect from Friday afternoon through Friday evening. * AREA AND TIMING...Northeast Highlands (Zone 123), Sandia and Manzano Mountains (Zone 124), Central Highlands (Zone 125) through 8 pm MDT this evening and Fire Weather Watch for Friday afternoon and early evening. * 20 FOOT WINDS...For today, northwest at 20 to 35 mph with gusts to 50 mph, and for Friday from the west and northwest at 20 to 25 mph with occasional gusts to 35 to 40 mph. * RELATIVE HUMIDITY...6 to 12 percent each afternoon. * IMPACTS...Any fires that develop will likely spread rapidly. Outdoor burning is not recommended.

Sent: Thu Apr-20 3:04 PM

Go to <https://www.indji.net/watch> to view further details in the Indji Watch client.



Copyright © 2023 Indji Systems, All rights reserved.

You are receiving this email because you are subscribed to email alerts for the Indji Watch business rule

'PNMDistributionUSNWSWeatherWarningInServiceTerritoryZone'. Please notify your corporate Indji Watch contact if you would like to unsubscribe from these alerts.

RFW induced Field Operation Changes

The Escalating Work Restriction Matrices in this section include mitigations that are required when an RFW has been issued for work being done in an HFA.

4.3.3 Indji Watch

PNM subscribes to Indji Watch (IW), a natural hazard alerting company. IW divides PNM T&D assets each into its own “project.” As described below, IW provides PNM with SA and alerts when weather and wildfires may impact PNM assets or operations. It also includes additional information as described here:

- **Wildfire alerting**
Anytime IW discovers a new fire within three miles of PNM assets, an alert is sent to PNM. The new fire location is displayed in the IW Threat Window and is available for viewing by all credentialed PNM personnel.
- **RFW**
IW pushes RFW alerts as both emails and text messages to PNM personnel according to their preferences in the IW Administrative Window. These emailed alerts are the basis for PNM’s RFW alerting system described above in Section 4.2.1 Red Flag Warning Protocol.
- **Lightning detection**
IW displays recent lightning strikes in its Threat Window.
- **Wind alerts**
When wind speeds are expected to exceed PNM-defined thresholds, alerts are texted or emailed to PNM personnel according to their administrative preferences.
- **Real time radar**
PNM can track the path and intensity of storms across its landscape.
- **Earthquakes**
Information is displayed in the Threat Window. Specific information on each event is available via pop-up displays.
- **Extreme Weather Alerts from the NWS**
The IW Threat Window constantly displays NWS alerts and warnings such as for High Wind, Extreme Heat, FWW, Ice Accumulations, etc. These same alerts are pushed to users via text or email according to their administrative preferences.

5.0 Emergency Preparedness

5.1 Wildfire Response and Recovery

Whenever wildfire or suppression activities are currently or expected to impact PNM infrastructure, PNM encourages agencies and landowners to notify the company. Upon learning about a wildfire, PNM's Crisis Management and Resilience team (CMR) is notified. According to the 2023 PNM Resources Crisis Management Plan (CMP Section V, Subsection D), when the Company is affected by an emergency or disaster, the Chief Executive Officer or their delegate implements a graduated approach to responding and managing the event. As the potential severity of the emergency or the demand on local resources grows, the PNM Incident Commander (IC) increases response and coordination activities. In following the Federal Emergency Management Agency Guidelines there are three Emergency Action Levels identified to assist with mobilizing efforts. The purpose of these levels is to provide a short-hand method for mobilizing forces. On-scene personnel estimate the level of response and then notify the CMR.

- Level Three – Normal Operations/Steady-State
 - Monitor only as there are no direct or expected impacts to the Company and updates are made to Leadership as needed or as determined necessary for continued or enhanced monitoring.
- Level Two – Enhanced Steady-State/Partial Activation
 - More in-depth monitoring takes place with regular updates provided to Leadership. The Emergency Operations Center may be partially activated to assist, either physically or virtually, as determined by the size, scope, and complexity of the credible threat, emergency, or disaster.
- Level One – Full Activation
 - Full monitoring of the credible threat, emergency, or disaster. The EOC is fully activated, physically or virtually, to assist as determined by the size, scope, and complexity of current incident. External partners are notified, and aid requested as needed.

Depending on the level of activation, based on the size, scope, and severity of the incident, regular briefings to Senior Leadership will be scheduled to share status, incident objectives, impacts to departments, and coordination with Corporate Communications (Corp Comms) for all internal/external communication activities.

5.2 Cooperation and Collaboration

To further bolster the capabilities of PNM, continual relationship building occurs between PNM and its external stakeholders, including First Responders. During an incident, all county emergency management agencies have pertinent contact information to include, but not limited to:

- Corporate Communications (CorpComms)
- Corporate Security (Physical)
 - Including contract security companies that PNM works with
- Distribution Operations Center (DOC)
- Line personnel that are assigned to the incident

To ensure that PNM and its external partners are fully engaged during an incident, there are many activities that take place between emergency incidents to familiarize PNM's partners with its operations and expectations during actual incidents. These activities include, but are not limited to:

- Evacuation Drills
- Table-Top Exercises
 - i.e., Law Enforcement participates in the annual PNM Cyber and Physical Security Incident Response Plan exercise
- Familiarization tours for those most likely to respond to a PNM facility during an incident
- Various Community-driven business meetings and/or activities
 - i.e., local Chamber of Commerce events
- Functional Exercise activities
 - Annual PNM Safety Day where local Fire/Rescue offers fire extinguisher training, and First Responders participate in electrical hazard and safety demonstrations
 - Annual Balloon Rescue Training for First Responders to familiarize them with techniques when encountering balloons entangled with PNM infrastructure
- Full-Scale Exercises
 - External partners are invited to participate in the multi-national bi-annual Grid Exercise hosted by the NERC.

5.3 In-Place PNM Wildfire Incident Processes

Most wildfires within the PNM Service Area will come and go without any impact on PNM infrastructure or employees. Others will require considerable coordination with all stakeholders. The following is a typical life cycle of a wildfire incident:

Fire Discovery – In addition to landowners and County RECC's providing information, PNM has a subscription with Indji Watch. This natural hazard alerting system emails alerts to users when a wildfire is detected within three miles of PNM infrastructure. Both Indji Watch and the PNM Fire Risk Dashboard display maps showing fire perimeter, wind, weather, and PNM Infrastructure. Other means of discovery notification comes from websites, field personnel, local news reports, the public, and social media platforms.

Classification and Monitoring – PNM has a four-level system for classification of fires to ensure consistency. These levels are as follows:

Level 1 - No impact to PNM Infrastructure is expected.

Level 2 - PNM continues monitoring of fire(s) to maintain quality SA and help to determine the proper level of classification, but no PNM response is expected.

Level 3 -

- a. Any fire previously classified as Level 2 and has now become more complex, or any fire upon initial discovery where local First Responders are requesting assistance or guidance from PNM personnel.
- b. Any fire that has caused any damage to PNM infrastructure.

- c. Any wildfire starting in an HFA or where the potential to affect PNM infrastructure is high due to weather conditions.

Level 4 -

- a. Any fire allegedly caused by PNM personnel and/or infrastructure
- b. Any fire that requires corporate support such as from HR, Legal, Planning, Insurance, etc.
- c. Any fire that results in trips, alarms, and/or recloser activities within the fire area

During fires of any classification level, all PNM participants shall establish a routine monitoring frequency in coordination with on-scene personnel and the CMR for the purpose of gathering relevant incident information for use in briefings and Situational Reports for Senior and Executive Leadership.

Communications – All fire incident information will require the involvement of the CorpComms Team. Any public facing information MUST be approved by and processed through them. All information will be disseminated to the *Wildfire Notification Distribution List*, which is reviewed and updated every 60 days by Communications. The notification list will include, but is not limited to:

- Corporate Communications (CorpComms Team)
- Wildfire Management
- Crisis Management and Resilience (CMR)
- DOC personnel
- Power Operations (PWOPS) personnel
- Any others as determined by leadership

The primary method of communication will be email, but a WebEx or Microsoft Team Chat can be established to foster continued communications.

Response –PNM employee safety is paramount and responding employees, if any, should have training in basic fire behavior, fire safety, and the Incident Command System (ICS).

Any response by PNM will depend on safety considerations and incident complexity such as the size, scope, and severity of the fire. Response personnel will receive regular training. A Personnel Accountability Report will be required to ensure employees are accounted for during response activities. Some factors that may require a PNM response include, but are not limited to:

- PNM infrastructure has been or is expected to be impacted by the fire and/or the suppression efforts.
- Fire activities require a spokesperson from PNM to provide information regarding any safety concerns.
- Coordination is needed for any de-energization and/or re-energization of conductors for the safety of firefighters and/or the public.

In addition to PNM Line Department personnel, the following PNM departments may be required to respond and interact with the external ICS organization:

- CorpComms
 - Responsible for all internal communications and external interactions with public and/or media outlets regarding emergency- or disaster-related information. Ensures all information released is current and acts as the single voice for the Company.

- Responsibilities and assignments are maintained, revised, and updated by CorpComms, as needed.
- Will fill the Public Information Officer role within the established external ICS structure, as needed.
- Provide inputs and summaries in support of EOC activities and decision-making processes
- Wildfire Management
 - Responsible for monitoring weather data and disseminating information to CMR and other PNM departments
 - Provide ongoing SA updates and information
- CMR
 - Responsible for the overall management of the emergency or disaster, all EOC activities, and coordination with emergency responders, as needed.
 - Responsible for the collection, analysis, and dissemination of incident information to be utilized by executive leadership and stakeholders in the decision-making process.
- DOC
 - Responsible for emergency outage restoration and the switching/transferring of loads within the distribution system
 - Communicate needs, scheduled work, planned outages, and maintenance appropriate to fire activities to other lines of business that may be impacted
 - Provide inputs and summaries in support of EOC activities and decision-making processes
- PWOPS
 - Responsible for maintaining system reliability and balancing transmission system and generation operations during an emergency or disaster
 - Communicate needs, scheduled work, planned outages, and maintenance appropriate to fire activities to neighboring utilities that may be impacted
 - Provide inputs and summaries in support of EOC activities and decision-making processes

5.4 Recovery and Restoration Activities

All recovery activities will be coordinated as appropriate both internally and externally to ensure that PNM infrastructure within the fire area is safe. Any work that needs to be completed within the fire area will require coordination with responders to ensure the safety of PNM personnel, First Responders, and the public during the restoration process.

To assist with recovery and restoration, PNM personnel will stage the necessary supplies and equipment, while coordinating with the on-scene Fire Agency Incident Commander and Safety Officer to ensure all restoration activities can be completed in a safe manner. PNM will strive to restore service as quickly as possible but may be limited by the ongoing incident activities.

6.0 Support During Wildfire Incidents

6.1 Corporate Communications

During a wildfire incident, CorpComms' primary role is to ensure that media, customers, and employees are informed and have the tools and information they need to stay safe. CorpComms works with a variety of media outlets during wildfire events. Incident-related communications pass to and from media outlets through CorpComms. Additionally, CorpComms provides real-time updates on social media for customers and external media. As appropriate, CorpComms will provide information to employees on platforms such as company memos or on the company's intranet. During an incident, CorpComms provides messaging for company department's use with external stakeholders who may be requesting updates. Designated CorpComms' staff will work with the media and local agencies for the coordination of news conferences and official company updates.

PNM recognizes that fire prevention, safety tips, and reminders are important public services it provides to its customers. Before the wildfire season starts, CorpComms works to prepare fire prevention and safety messaging for customers. A news release with wildfire safety information is sent statewide to media. Safety and prevention tips are posted on social media platforms such as X, Facebook, and Instagram during fire season. The Energy Works newsletter may also be used as an additional resource to deliver valuable information to customers during wildfire season. PNM also has a safety section on the [PNM.com/wildfire-safety](https://www.pnm.com/wildfire-safety) website that contains wildfire safety topics as well as other sections with valuable safety tips regarding electrical safety, storm safety, kid safety, hot air balloon safety, and more.

CorpComms initiates and facilitates communications with other utility partners such as adjoining electric utility, water, and telecommunication services.

6.2 Customer Support

Wildfires can have a devastating impact on any community. Power may be out for an extended period. PNM's customers will benefit from available communication and information access, particularly those customers that require power for medical devices.

PNM may initiate communications to customers who have signed up for text service and are potentially affected by fire-caused power outages. Other messaging is sent via PNM website, television, radio, social media, text messages, live phone calls, and pre-recorded phone calls as appropriate and as PNM resources are available.

Increased communication and access to information can help ease the financial burden experienced by its customers at an especially traumatic time.

6.3 Low-income Customer Support

PNM has numerous programs in place to help low-income customers during and after wildfires. The Public Affairs and Community Outreach Team supports organizations such as the American Red Cross or Salvation Army to provide low-income customer support and may do so during and after wildfire events, resources permitting. PNM's post-fire assistance may include:

- Electric bill assistance from the PNM Good Neighbor Fund.
- Providing payment plans for electric bills.
- Suspending disconnect for non-payment for fire affected homes/accounts.
- Assisting with deposit waivers or offering other deposit billing solutions.
- Partnering with various community organizations, to secure more assistance for families.

This page was intentionally left blank.

APPENDIX A
PNM HAZARDOUS FIRE AREAS – DETAILED MAPS

This page was intentionally left blank.

New Mexico Hazardous Fire Areas (HFAs)

Clayton West

Map Legend



Transmission within HFA

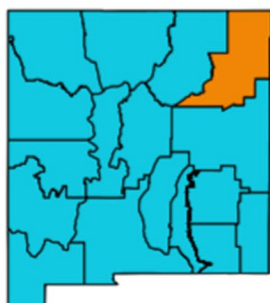
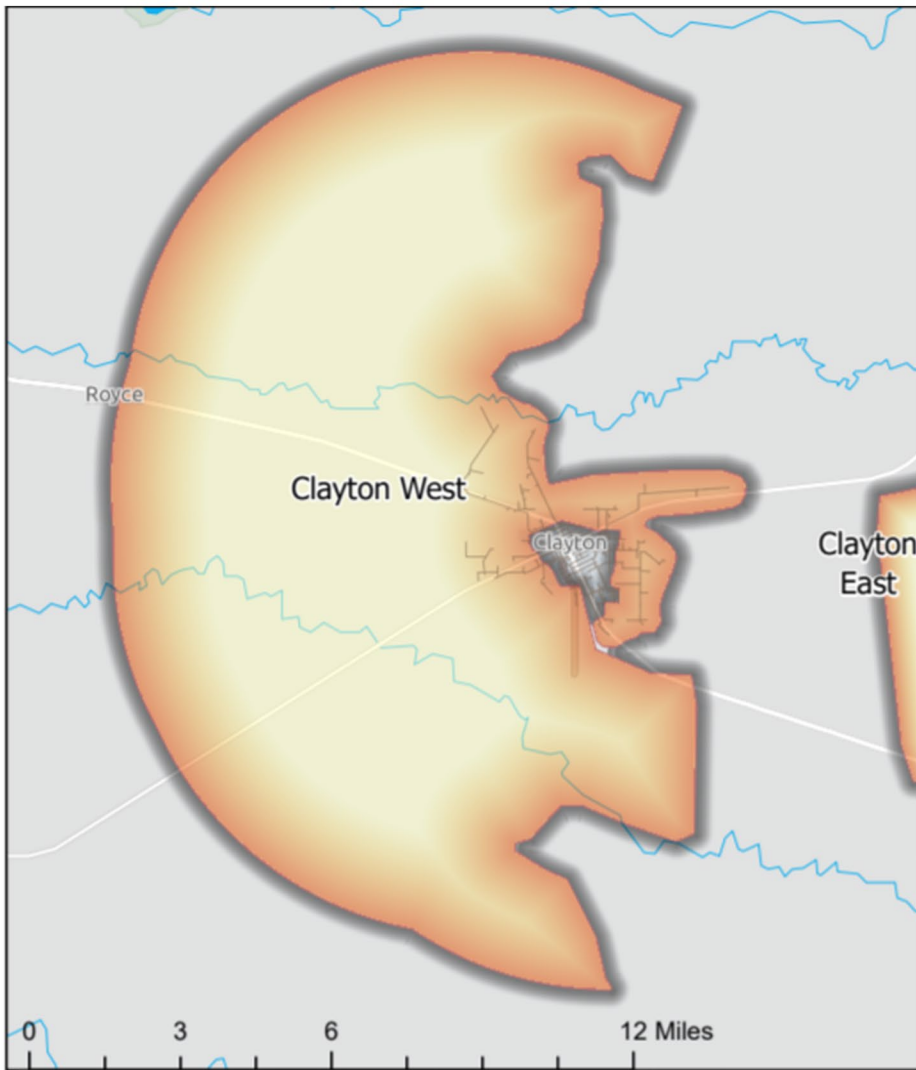
1.38 Miles

0.04% of System

Distribution within HFA

19.63 Miles

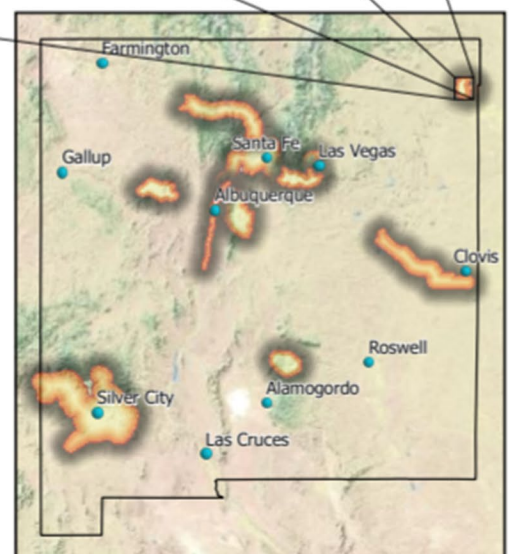
0.34% of System

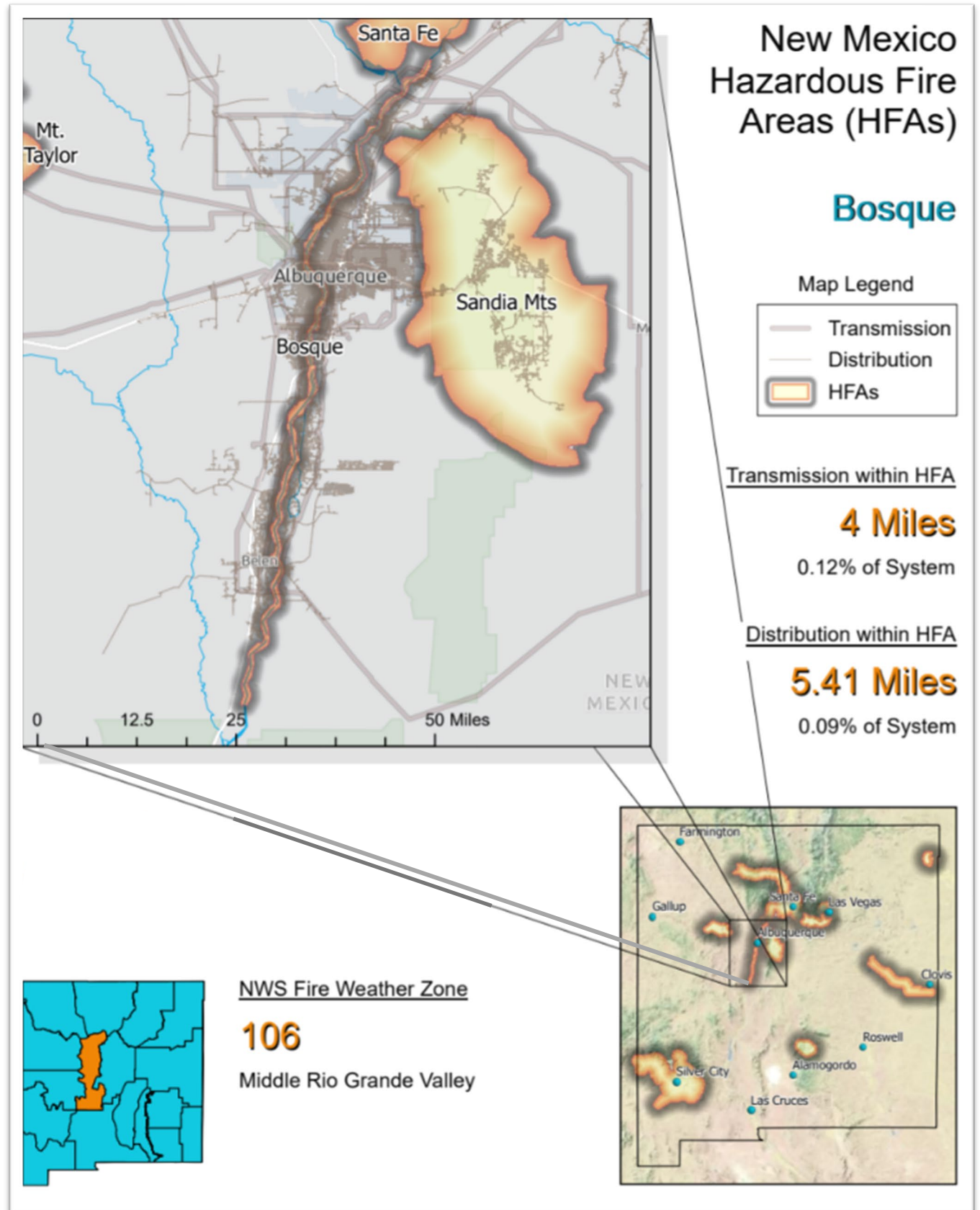


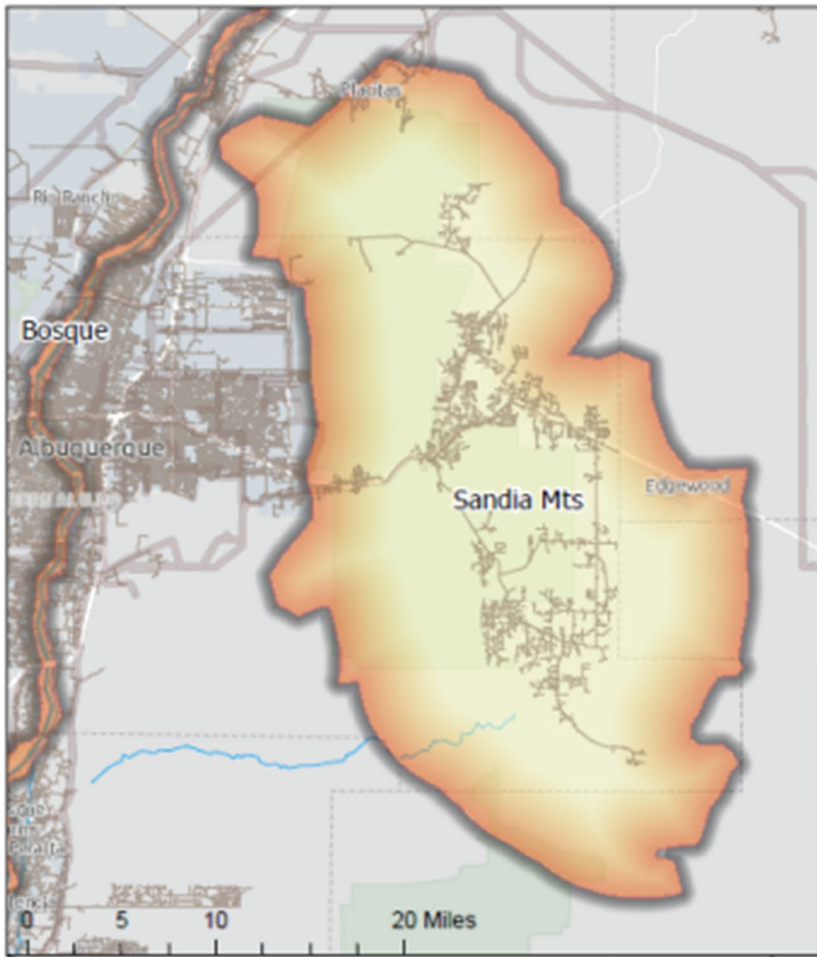
NWS Fire Weather Zone

104

Northeast Plains



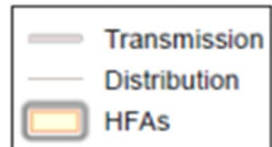




New Mexico Hazardous Fire Areas (HFAs)

Sandia Mts

Map Legend



Transmission within HFA

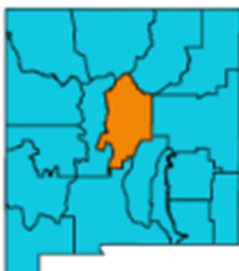
27.42 Miles

0.85% of System

Distribution within HFA

406.59 Miles

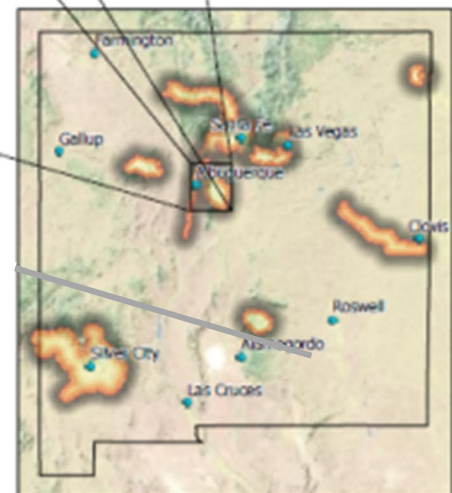
6.96% of System



NWS Fire Weather Zone

107

Sandia, Manzano and Gallinas Mts



New Mexico Hazardous Fire Areas (HFAs)

Fort Sumner

Map Legend



Transmission within HFA

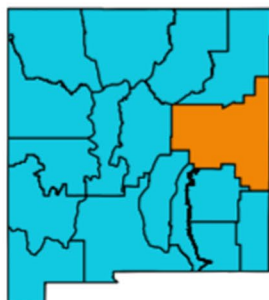
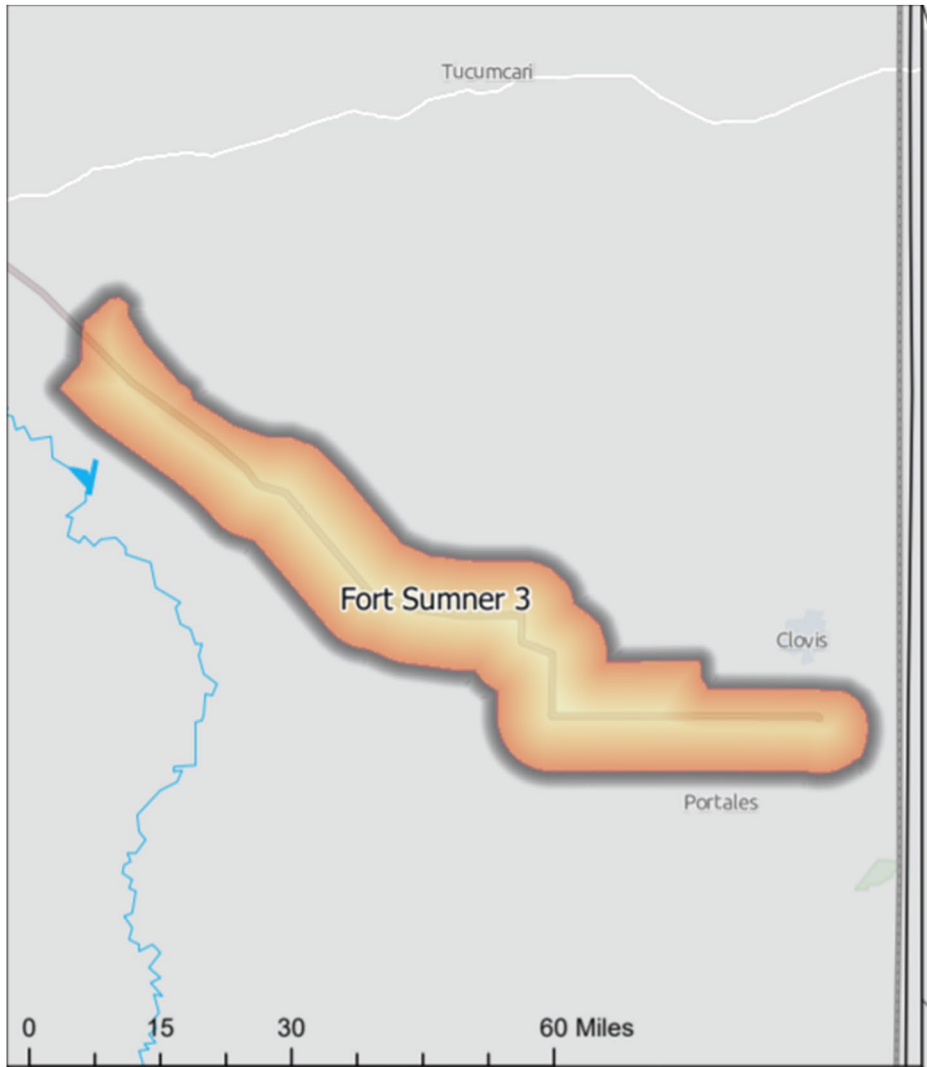
88.34 Miles

2.75% of System

Distribution within HFA

0 Miles

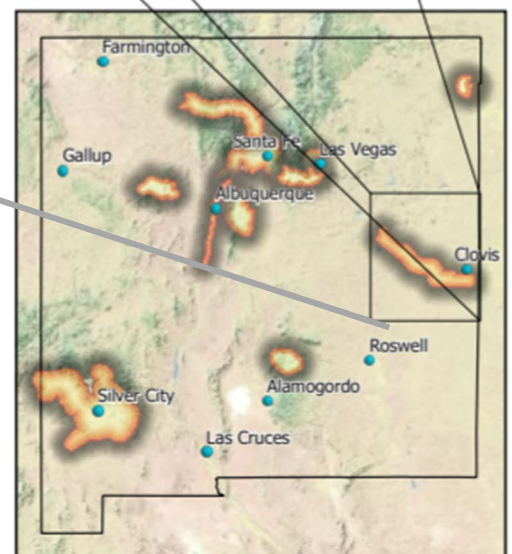
0% of System



NWS Fire Weather Zone

108

East Central Plains



New Mexico Hazardous Fire Areas (HFAs)

Mt. Taylor

Map Legend



Transmission within HFA

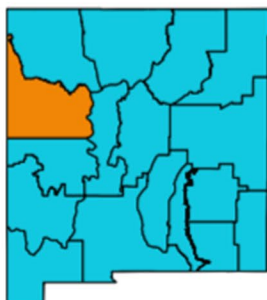
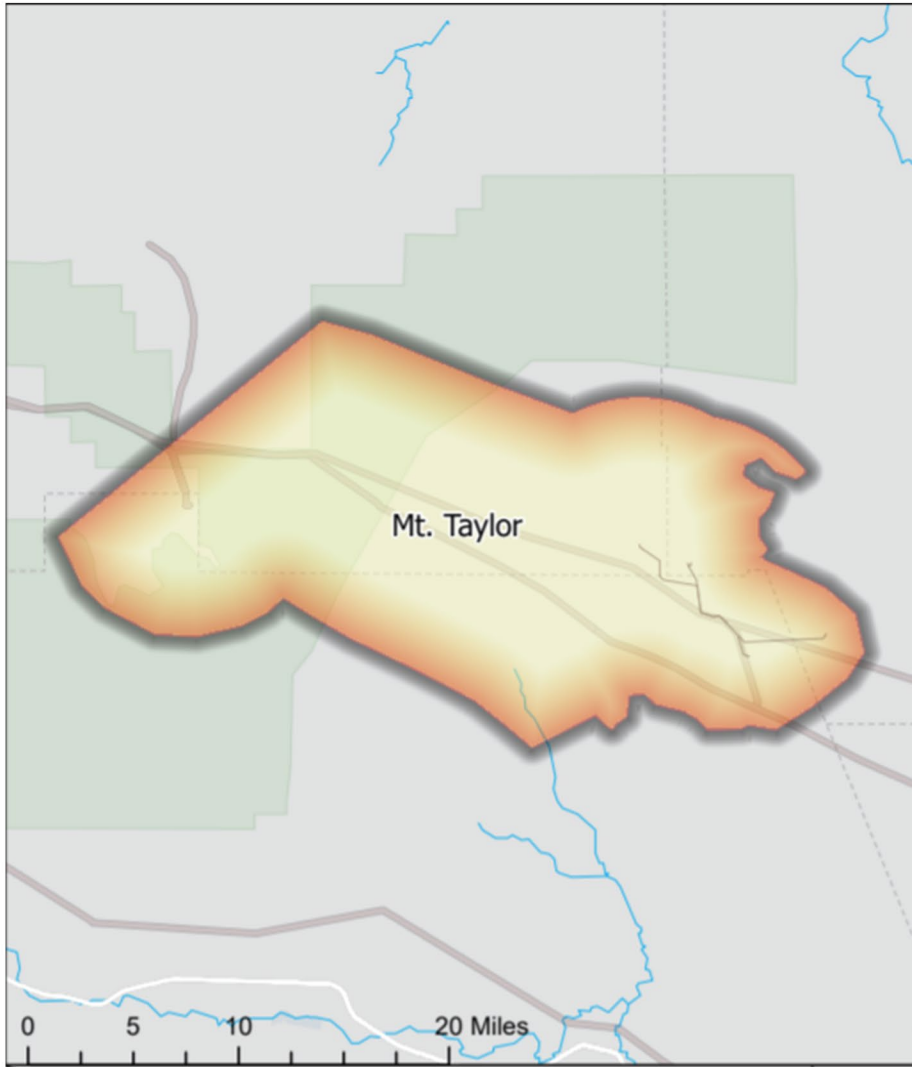
63.04 Miles

1.96% of System

Distribution within HFA

13.82 Miles

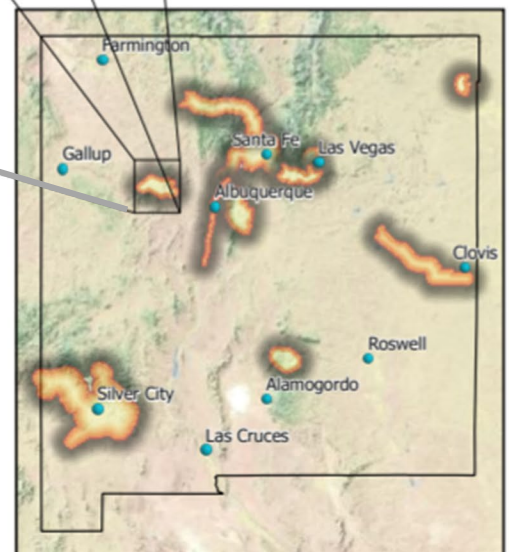
0.24% of System



NWS Fire Weather Zone

105

Northwest Highlands



New Mexico Hazardous Fire Areas (HFAs)

Ruidoso

Map Legend



Transmission within HFA

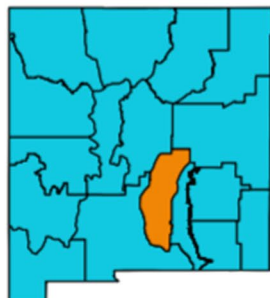
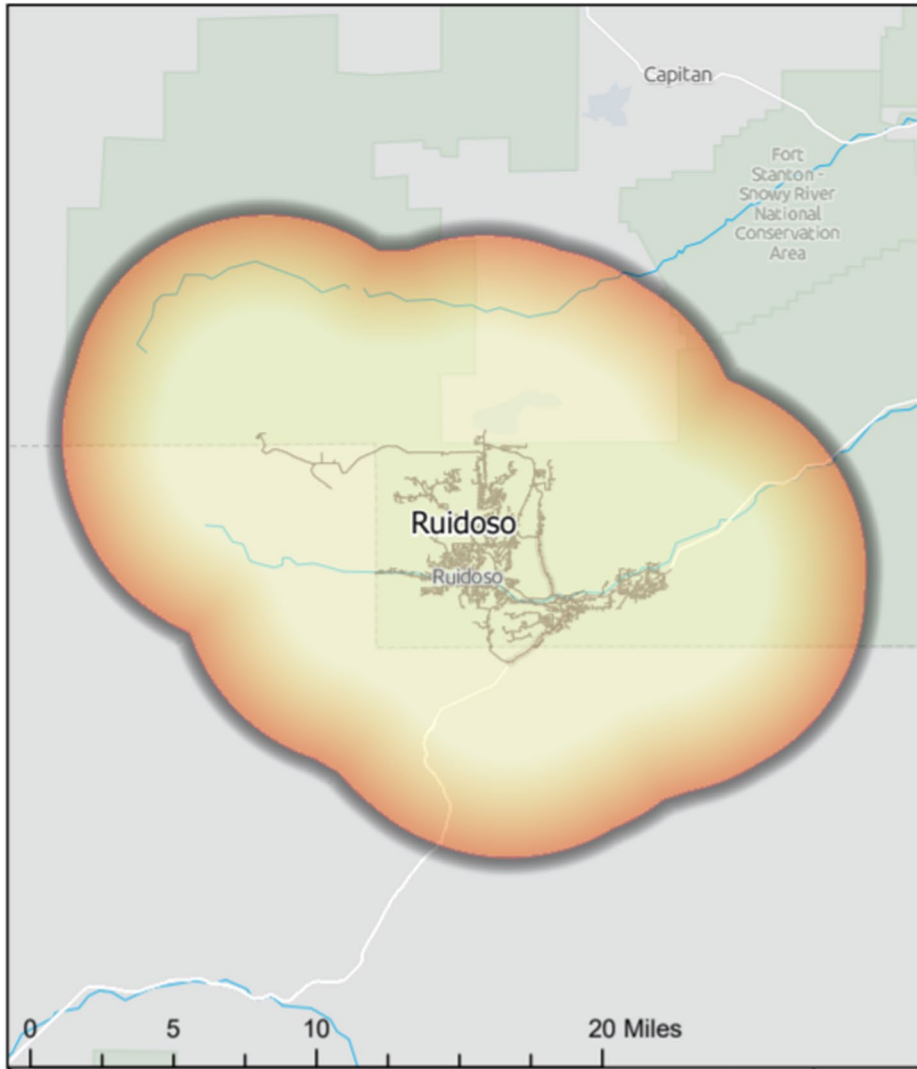
5.4 Miles

0.17% of System

Distribution within HFA

176.16 Miles

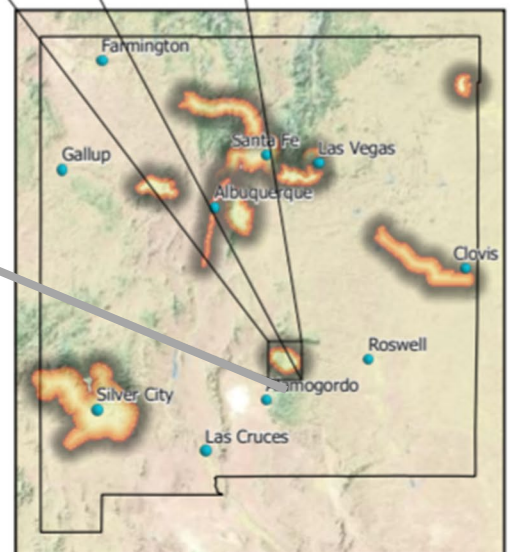
3.01% of System



NWS Fire Weather Zone

113

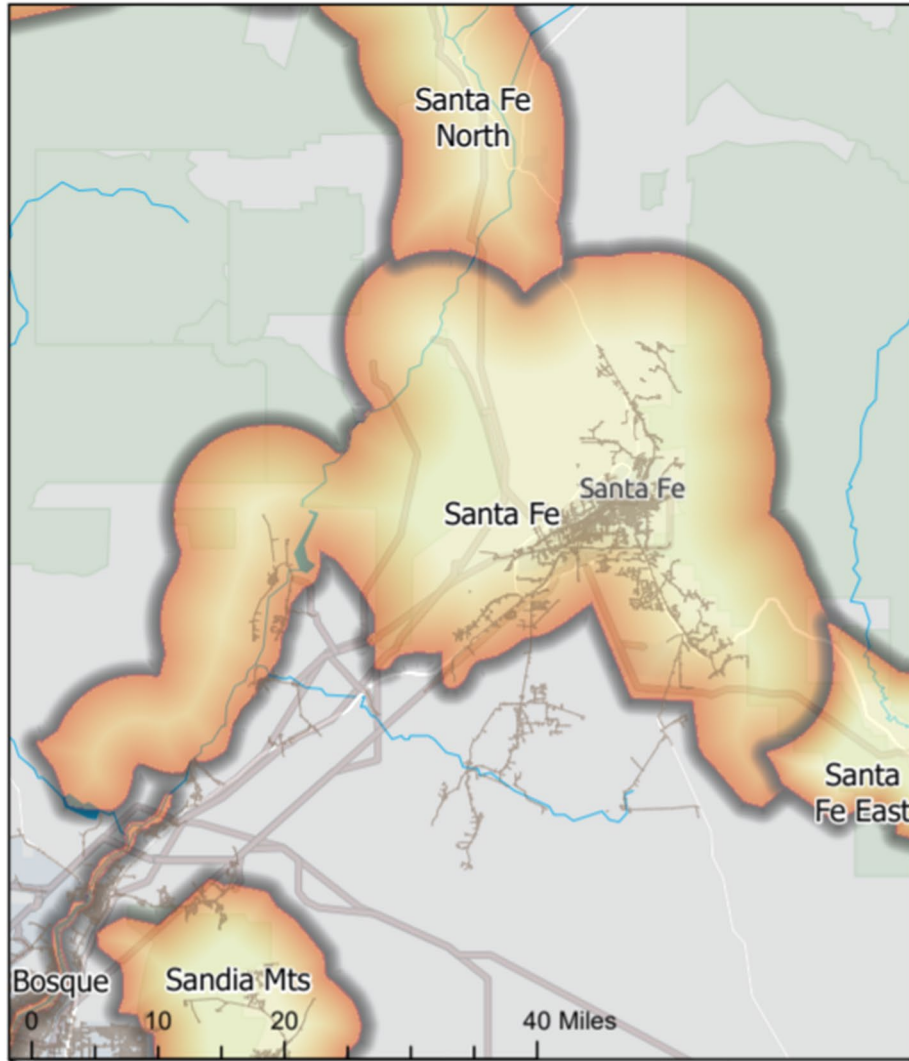
Capitan and Sacramento Mts



New Mexico Hazardous Fire Areas (HFAs)

Santa Fe

Map Legend



Transmission within HFA

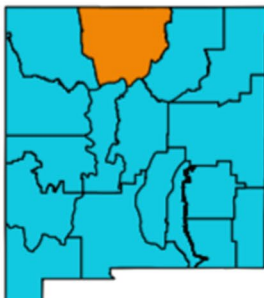
184.1 Miles

5.73% of System

Distribution within HFA

497.68 Miles

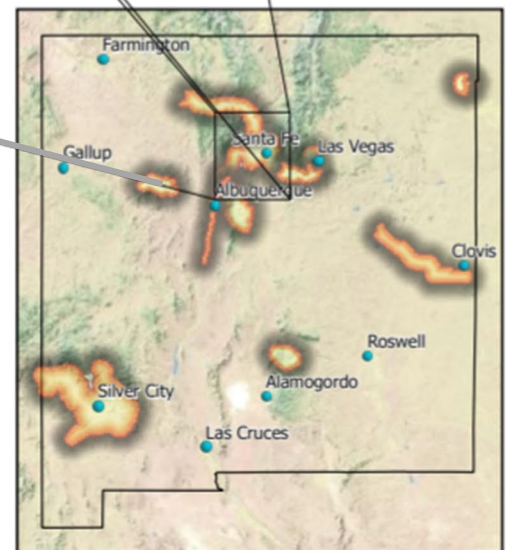
8.52% of System



NWS Fire Weather Zone

102

North Central Mts



New Mexico Hazardous Fire Areas (HFAs)

Santa Fe East

Map Legend



Transmission within HFA

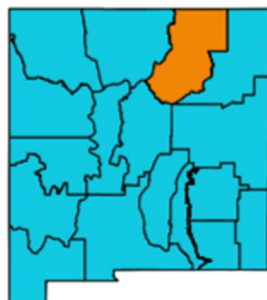
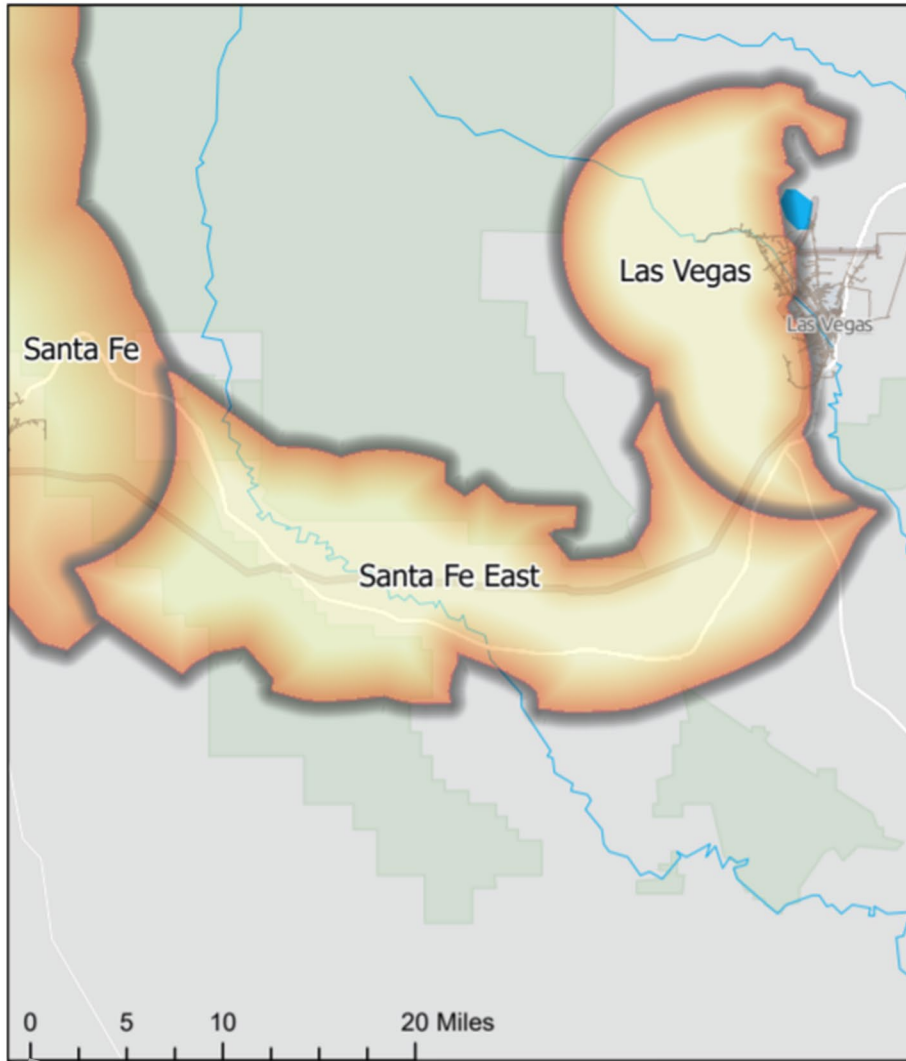
27.17 Miles

0.85% of System

Distribution within HFA

0 Miles

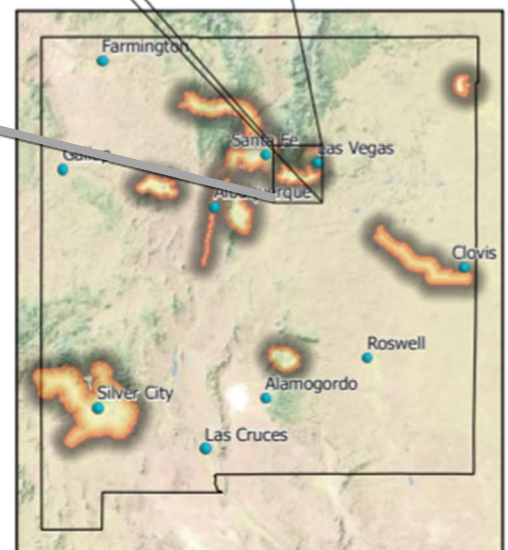
0% of System



NWS Fire Weather Zone

103

Northeast Highlands



New Mexico Hazardous Fire Areas (HFAs)

Santa Fe North

Map Legend



Transmission within HFA

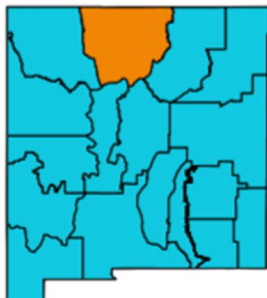
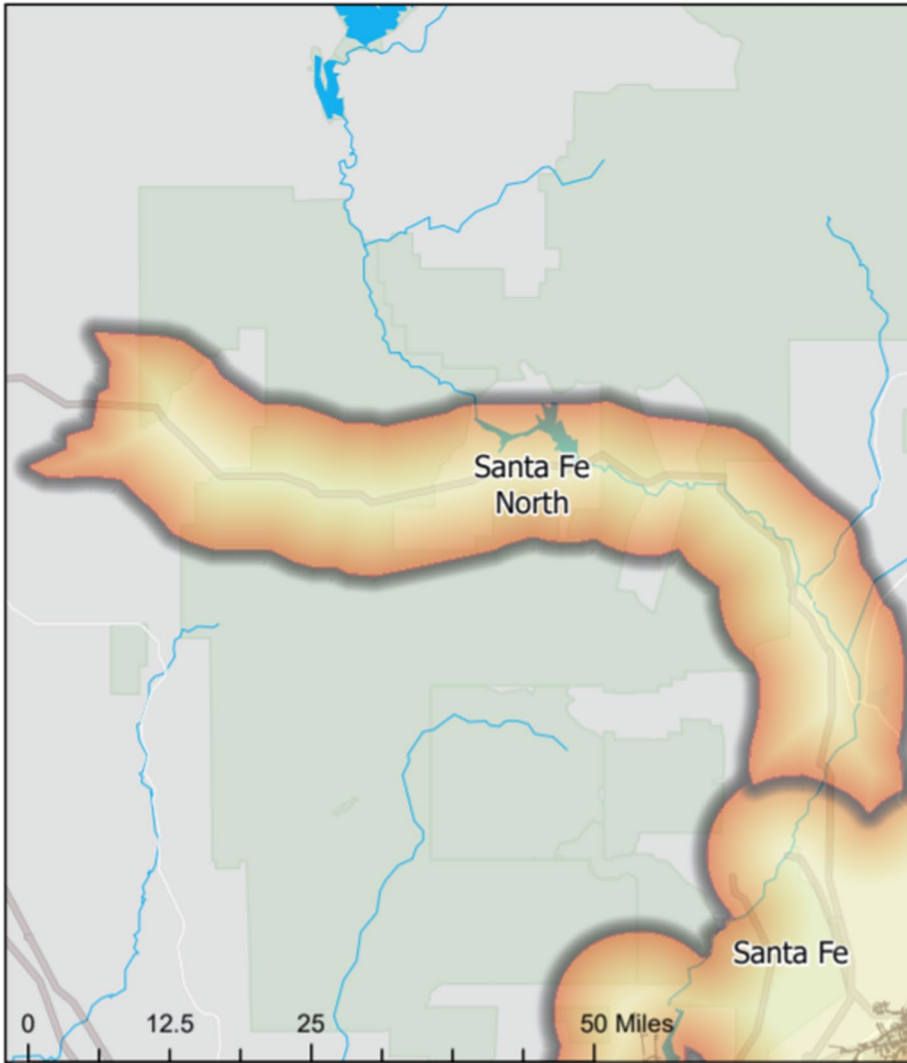
74.21 Miles

2.31% of System

Distribution within HFA

0 Miles

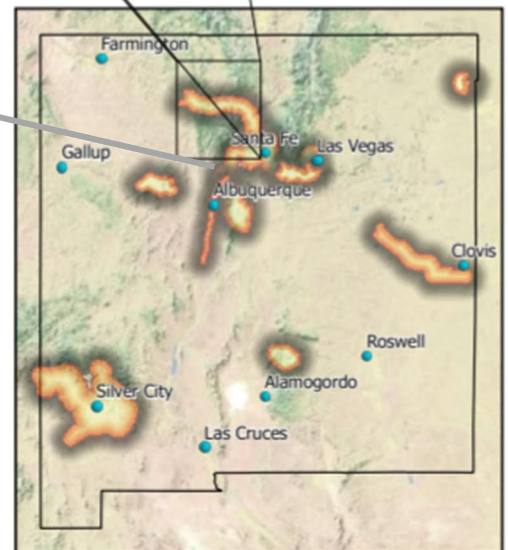
0% of System



NWS Fire Weather Zone

102

North Central Mts



New Mexico Hazardous Fire Areas (HFAs)

Silver City

Map Legend



Transmission within HFA

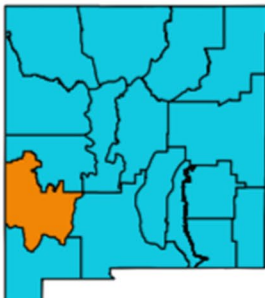
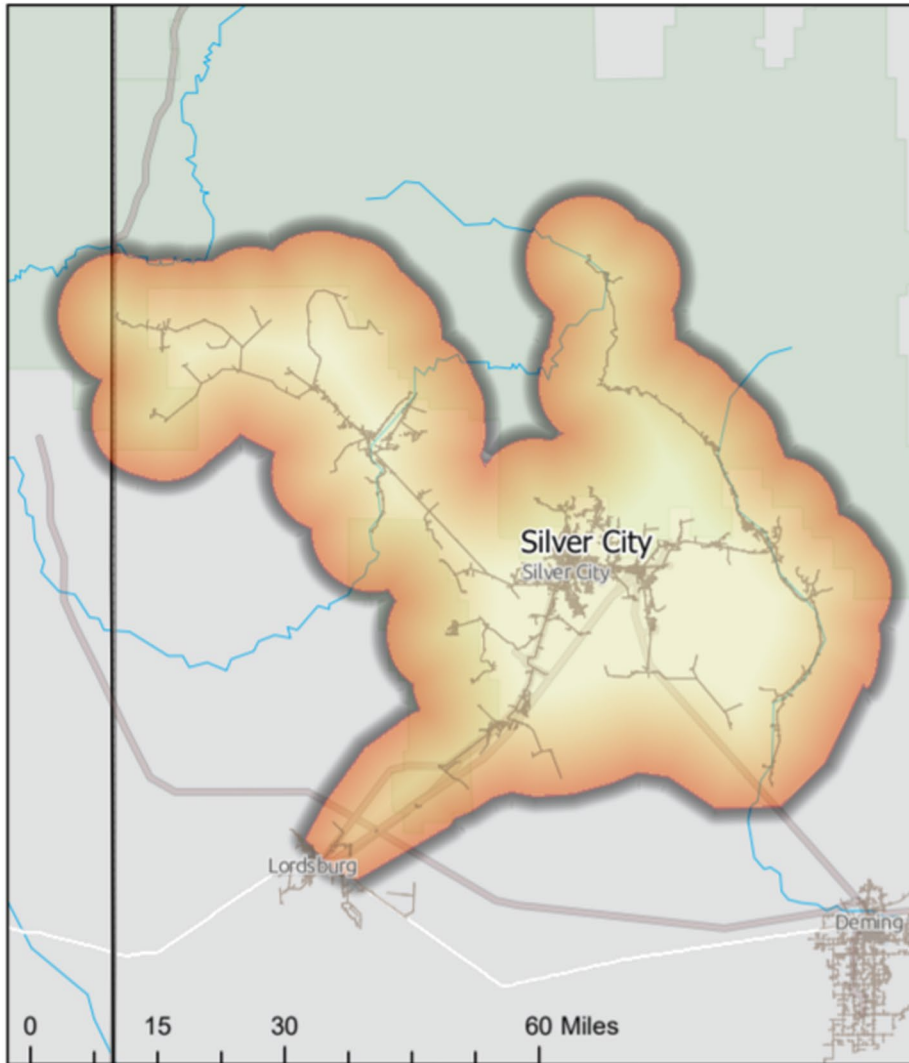
194.5 Miles

6.05% of System

Distribution within HFA

976.76 Miles

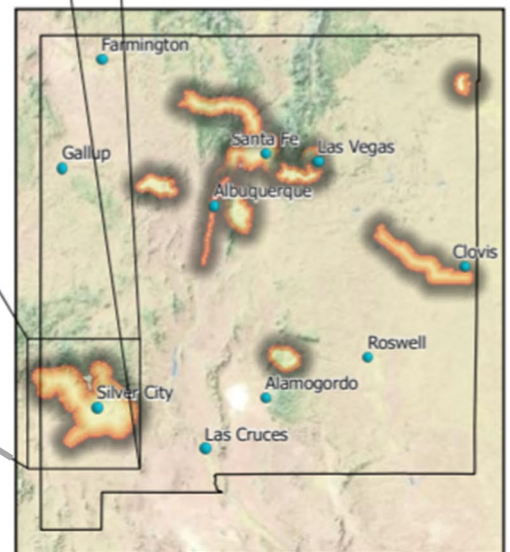
16.71% of System



NWS Fire Weather Zone

110

Southwest Mts



BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF AN INQUIRY INTO ELECTRIC)
PUBLIC UTILITIES' VEGETATION MANAGEMENT) Case No. 22-00154-UT
PLANS AND PROCEDURES)**

SELF AFFIRMATION

Wesley W. Gray, Executive Director, Transmission Substation and Distribution Field Operations, Public Service Company of New Mexico, upon being duly sworn according to law, under oath, deposes and states: I have read the foregoing **Public Service Company of New Mexico's Annual Report Wildfire Mitigation, Vegetation Management and Infrastructure Maintenance Expense Spending- Compliance Filing in Case No. 22-002154-UT**. I further affirmatively state that I know the contents thereof and that they are true and correct to the best of my knowledge and belief.

DATED this 31st day of January, 2025.

/s/ Wesley W. Gray
WESLEY W. GRAY

GCG # 533392

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF AN INQUIRY INTO ELECTRIC)
PUBLIC UTILITIES' VEGETATION MANAGEMENT) Case No. 22-00154-UT
PLANS AND PROCEDURES)**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of **Public Service Company of New Mexico's Annual Report Wildlife Mitigation, Vegetation Management and Infrastructure Maintenance Expense Spending - Compliance Filing in Case No. 22-00154-UT** was emailed to parties at the email addresses below on January 31, 2025:

PRC Records Management Bureau	Prc.records@prc.nm.gov;
Anthony Medeiros	Anthony.medeiros@prc.nm.gov ;
Ana Kippenbrock	Ana.kippenbrock@prc.nm.gov ;
Christopher Ryan	Christopher.Ryan@state.nm.us;
Robert Lundin	robert.lundin@prc.nm.gov;
Scott Cameron	Scott.cameron@prc.nm.gov;
Andrew Harriger	akharriger@sawvel.com ;
Charles Kolberg	ckolberg@abcwua.org ;
Dahl Harris	dahlharris@hotmail.com;
David Garrett	dgarrett@resolveuc.com ;
Ed Farrar	edfarrarcpa@outlook.com ;
Keith Herrmann	kherrmann@stelznerlaw.com;
L. Erica Flores	eflores@stelznerlaw.com;
Mark Garrett	mgarrett@garrettgroupllc.com ;
Nann M. Winter	nwinter@stelznerlaw.com;
Marah deMeule	mdemeule@bernco.gov;
Valerie Joe	vjoe@bernco.gov;
Bernice Vigil	bvigil@bernco.gov;
Maureen Reno	mreno@reno-energy.com;
Natalia Sanchez Downey	ndowney@bernco.gov ;
Cara Lynch	Lynch.Cara.NM@gmail.com ;
Charles de Saillan	desaillan.ccae@gmail.com ;
Don Hancock	sricdon@earthlink.net;
Justin Brant	jbrant@swenergy.org;
Michael Kenney	mkenney@swenergy.org;

Jacob Schlesinger	jschlesinger@keyesfox.com ;
Joseph Yar	joseph@velardeyar.com ;
Kevin Cray	kevin@communitysolaraccess.org ;
Shawna Tillberg	shawna@velardeyar.com
Brent Chapman	bchapman@cabq.gov;
Devon King	dking@cabq.gov;
Jennifer Lucero	jenniferlucero@cabq.gov;
Larry Blank	lb@tahoeconomics.com;
Jody Kyler Cohn	jkylercohn@BKLLawfirm.com;
Joseph Yar	joseph@velardeyar.com;
Justin Bieber	jbieber@energystrat.com;
Kurt J. Boehm	kboehm@bkllawfirm.com;
Christopher Sandberg	cksandberg@mac.com ;
Mariel Nanasi	mariel@seedsbeneaththesnow.com;
Stephanie Dzur	Stephanie@dzur-law.com
Andrea Crane	ctcolumbia@aol.com;
Doug Gegax	dgegax@nmsu.edu;
Gideon Elliot	gelliot@nmag.gov;
Jocelyn Barrett	jbarrett@nmag.gov;
Josh LaFayette	jlafayette@nmag.gov;
Brian Andrews	bandrews@consultbai.com;
Christopher Walters	cwalters@consultbai.com;
Gerard Ortiz	gortiz1229@gmail.com;
Greg Meyer	gmeyer@consultbai.com;
James R. Dauphinais	jdauphinais@consultbai.com;
Katrina Reid	office@thegouldlawfirm.com;
Kelly Gould	kelly@thegouldlawfirm.com;
Peter J. Gould	peter@thegouldlawfirm.com;
Agata Malek	agata.malek@prc.nm.gov;
Bryce Zedalis	bryce.zedalis1@prc.nm.gov ;
Christopher Dunn	Christopher.Dunn@prc.nm.gov ;
Ed Rilkoff	ed.rilkoff@prc.nm.gov ;
Elisha Leyba-Tercero	Elisha.leyba-tercero@prc.nm.gov;
Elizabeth Jeffreys	elizabeth.jeffreys@prc.nm.gov;
Elizabeth Ramirez	Elizabeth.Ramirez@prc.nm.gov;
Evan Evans	evan.evans@integritypower.net;
Gabriella Dasheno	gabriella.dasheno@prc.nm.gov;
Georgette Ramie	georgette.ramie@prc.nm.gov;
Jack Sidler	Jack.Sidler@prc.nm.gov;

John Bogatko	john.bogatko@prc.nm.gov;
Jonah Mauldin	Jonah.Mauldin@prc.nm.gov ;
Marc Tupler	Marc.tupler@prc.nm.gov;
Peggy Martinez-Rael	Peggy.Martinez-Rael@prc.nm.gov ;
Anne Haskins	Anne.Haskins@pnm.com;
Adam Alvarez	Adam.Alvarez@pnm.com;
Debrea Terwilliger	dterwilliger@wbklaw.com ;
John Verheul	John.verheul@pnmresources.com ;
Justin Rivord	Justin.Rivord@pnm.com;
Henry Monroy	Henry.Monroy@pnmresources.com;
PNM Regulatory	pnmregulatory@pnm.com ;
Raymond L. Gifford	rgifford@wbklaw.com;
Rick Alvidrez	ralvidrez@mstlaw.com;
Ruth Townsend	Ruth.Townsend@pnm.com;
Stacey Goodwin, Esq.	Stacey.Goodwin@pnmresources.com;
Jason Marks	lawoffice@jasonmarks.com;
Matt Gerhart	matt.gerhart@sierraclub.org ;
Randy S. Bartell	rbartell@montand.com;
Steve W. Chriss	Stephen.chriss@wal-mart.com;
Cydney Beadles	Cydney.Beadles@westernresources.org;
Caitlin Evans	caitlin.evans@westernresources.org ;
A.J Gross	ajgross@hollandhart.com;
Abbas Akhil	abbas@revtx.com;
Abbas Akhil	aakhil@comcast.net;
Abigail Sawyer	abigail@newsdata.com;
Adam Harper	adamh@osceolaenergy.com;
Adele Lee	aclee@hollandhart.com;
Alejandra Chavira	Alejandra,Chavira@epelectric.com;
Alena Brandenberger	Alena.brandenberger@cnmec.org;
Allen H. Downs	Biz@lifeisgood2.com;
Alton Looney	alooney@ad.nmsu.edu;
Amanda Alderson	aalderson@consultbai.com;
Amanda Edwards	AE@jalbLaw.com;
Amy Shelhamer	ashelhamer@courtneylawfirm.com;
Anastasia S. Stevens	Astevens.law@gmail.com;
Andrew Stone	andrew@stone.com;
Anne Dorough	District5@soccoroelectric.com;
Antonio Sanchez	sancheza@rcec.coop;
Art O'Donnell	Art.O'Donnell@prc.nm.gov;

Austin Rueschhoff	darueschhoff@hollandhart.com;
B. Hart	Joshua.smith@sierraclub.org;
Ben Luxenburg	Ben.luxenburg@galeheaddey.com;
Bernnarr Treat	Bernarr.RTreat@xcelenergy.com;
Bobby Ferris	bferris@lcecnecnet.com;
Brad Baldridge	Brad.baldridge@xcelenergy.com;
Brian K Johnson, PE	brian@nmreta.net;
Brooke Trammell	Brooke.a.trammell@xceleceergy.com;
Bruce Throne	bthorne@newmexico.com;
Capt. Robert L Friedman	Robert.Friedman5@us.af.mil;
Capt. Lanny Zieman	Lanny.Zieman1@us.af.mil;
Capt. Natalie Cepak	Natalie.Cepak2@us.af.mil;
Carla Najar	csnajar@virtuelaw.com;
Carol Clifford	carol@thejonesfirm.com;
Cindy Baeza	Cindy.baeza@xcelenergy.com;
Charles Noble	Noble.ccae@gmail.com;
CFREC CLEANENERGY	cfrecleanenergy@yahoo.com;
Charles Garcia	cgarcia@cuddymccarthy.com;
Charles Mulcock	charliem@ote-coop.com;
Charles T Pinson	cpinson@cvecoop.org;
Chris Dizon	Chris.dizon@endlessenergy.solar;
Chris Martinez	Chrism@col-coop.com;
Chris McKee	Chris.mckee@krqe.com;
Chris Punt	Chris.j.punt@xcelenergy.com;
Chuck Moore	cmoore@navopache.org;
Collin Gillespie	Collin.Gillespie@prc.nm.gov;
Columbus Electric	general@col-coop.com;
Continental Divide Electric	bob@rf-lawfirm.com;
Corina Sandoval	csandoval@cdec.coop;
Curtis Hutcheson	Curtis.hutcheson@epelectric.com;
Cynthia Hall	Cynthia.Hall@prc.nm.gov;
Damon Withrow	Damon.withrow@xcelenergy.com;
Dana S. Hardy	dhardy@hinklelawfirm.com;
Daniel Najjar	dnajjar@virtuelaw.com;
Danil Najjar	vnajjar@aol.com;
Darren Zigich	Darenk.zigich@prc.nm.gov;
Dave Sonnatag	D_Sonntag@wfec.com;
David Black	David.black@prc.nm.gov;
David Spardlin	spardlin@springercoop.com;

Delbert Lucero	delbertl@ote-coop.com;
Dena M. Bennett	dmb@modrall.com;
Denise Barrera	deniseb@secpower.com;
Devi Glick	dglick@synapse-energy.com;
Don Hancock	sricdon@earthlink.com;
Duncan Valley Electric	kimberly@dvec.org;
Dylan Connelly	dylan.connelly@affordable-solar.com;
Ed Rougemont	ederougemont@nmelectric.coop;
EJ-Charles Carter Hall	Chall@earthjustice.org;
EJ-Jill Tauber	jtauber@earthjustice.org;
Eric Martinot	emartinot@gridworks.org;
Ernesto Gonzales	egonzales@jemezcoop.org;
Farmers' Electric Cooperative, Inc.	fec@fecnm.org;
Fred Kennon	fredk@donaanacounty.org;
Gabrielle Burkhart	Gabrielle.Burkhart@krqe.com;
Garibay, Joe A	joe.garibay@epelectric.com;
Gary Roulet	g_roulet@wfec.com;
Gilbert Fuentes	GilbertT.Fuentes@prc.nm.gov ;
Gino Grilli	ggrilli@dimension-energy.com;
Greg Sonnenfeld	greg@sonnenfeldconsulting.com;
Holland Hart	glgarganoamari@hollandhart.com;
Jacob Fraatz	jfraatz@dimension-energy.com;
Jacqueline Waite	jacqueline.waite@prc.nm.gov ;
James Schichtl	James.Schichtl@epelectric.com;
Jane L. Yee	jane.cambio@gmail.com;
Janie Chermak	jchermak@unm.edu;
Jarryd Commerford	jarryd@srenergy.com;
Jason Marks	lawoffice@jasonmarks.com;
Jason Montoya	JasonN.Montoya@prc.nm.gov ;
Jason Trujillo	jtrujillo@morasanmiguel.coop;
Javier Perea	lperea@solarsmartliving.com;
Jeff Wernert	jwernert@theprimegroupllc.com;
Jeffrey H. Albright	JA@JalbLaw.com;
Jeffrey J. Wechsler	Jwechsler@montand.com;
Jemez Mountain Electric	mhastings@jemezcoop.org;
Jenna Warmuth	jwarmuth@nexamp.com;
Jennifer Ortiz	Jennifer.Ortiz@epelectric.com;
Jennifer Vega-Brown	Jvega-brown@las-cruces.org;
Jeremy Lewis	jlewis@slo.state.nm.us;

Jim DesJardins	jimdesjardins1@gmail.com;
Jim DesJardins	j.desjardins@hotmail.com;
Jorge A. Garcia	JAG@las-cruces.org;
Jose F. Provencio	Joprovencio@las-cruces.org;
Jose Lovato	jlovato@kitcarson.com;
Joshua L. Smith	Jsmith.watsonlawlc@gmail.com;
Jospeh Herrera	jherrera@socorroelectric.com;
Judith Amer	Judith,Amer@prc.nm.gov;
Judith Parsons	Judith.parsons@epelectric.com;
Julia Broggi	jbroggi@hollandhart.com;
Julie Park	jpark@cabq.gov ;
Julie Tackett	j_tackett@wfec.com;
Kari E. Olson	Kolson@montand.com;
Katelyn Hart	katelyn.hart@gknet.com;
Katherine Coleman	katie.coleman@tklaw.com;
Kelsey Rader	Krader@cabq.gov;
Ken Wilson	ken.wilson@westernresources.org;
Keven Gedko	kgedko@nmag.gov;
Keven Groenewold	kgroenewold@nmelectric.coop;
Kitty Turner	KAT@jpollockinc.com;
Kyle J. Smith	Kyle.j.smith124.civ@mail.mil;
Kyle Reddell	kyle.a.reddell@xcelenergy.com;
Lance Adkins	lance@fecnm.org;
Laura Rodriguez	laura.rodriguez@epelectric.com;
Lea County Electric	mnewell@newellawnm.com;
Leah Boone	LBoone@cvcoop.org;
Les Montoya	lmontoya@morasanmiguel.coop;
Leslie Padilla	Leslie.Padilla@pnmresources.com;
Linda Hudgins	Linda.l.hudgins@xcelenergy.com;
Linda Pleasant	Linda.pleasant@epelectric.com;
Lisa LaRoque	Llaroque@las-cruces.org;
Lisa Tormoen Hickey	lisahickey@newLawgroup.com ;
Liz Stevens	liz.stevens@tristategt.org ;
Luis Reyes	lreyes@kitcarson.com;
M. Poche	mpoche@kitcarson.com;
Maj Scott Kirk	Andrew.Unsicker@us.af.mil;
Marcia B. Driggers	marcyd@las-cruces.org;
Mario A. Contreras	marior@ote-coop.com;
Mark Faulkenbury	M_Faulkenberry@wfec.com;

Mark Walker	Mark.a.walker@xcelenergy.com;
Marta Tomic	marta@votesolar.org;
Matthew Collins	matthew.collins@cnmec.org;
Matthew Dunne	Mdunne337@gmail.com
Matthew Loftus	matthew.p.loftus@xcelenergy.com;
Matthew Miller	Matthew.miller@sierraclub.org;
Mayane Barudin	mayane@votesolar.org;
Mayor Trujillo	mayortrujillo@cityofanthonym.org;
Melanie Enderdine	makenderdine@energyfuturesinitiative.org;
Melissa Trevino	Melissa Trevino@oxy.com;
Merrie Lee Soules	mlsoules@hotmail.com;
Michael I. Garcia	MikGarcia@bernco.gov;
Michael J. Moffett	mmoffett@cmtisantafe.com;
Michael Keegan	mkeegan@wbklaw.com;
Michael P. Gorman	mgorman@consultbai.com;
Michael Ropp	meropp@sandia.gov;
Michelle Rosier	Michelle.rosier@prc.nm.gov ;
Mike D'Antonio	michael.a.d'antonio@xcelenergy.com;
Mora-San Miguel Electric	lwiggins@wwwlaw.us;
Mr. Thomas Jernigan	Thomas.Jernigan.3@us.af.mil;
Ms. Ebony Payton	Ebony.Payton.ctr@us.af.mil;
Nadine Varela	nvarela@kitcarson.com;
Nancy Burns	Nancy.burns@epelectric.com;
Nathan Duran	nduran@jemezcoop.org;
Navopache Electric	ggouker@navopache.org;
Neil Burbure	neil.burbure@galeheaddev.com;
Nelson Goodin	nelsong@donaanacounty.org;
Nicholas Koluncich	nkoluncich@slo.state.nm.us;
Nikolas Stoffel	nsstoffel@hollandhart.com;
NMIEC- James Dauphinais	jdauphinais@consultbai.com;
NMIEC- Peter Gould	peter@thegouldlawfirm.com;
NMIEC-Richard C. Mertz	rcmertz7@outlook.com;
NMSU- Doug Gegax	dgegax@nmsu.edu;
NMSU General Counsel	gencounsel@nmsu.edu;
Northern Rio Arriba Electric	nora@noraelectric.org;
Olga Lavrova	olavrova@nmsu.edu;
Otero County Electric	s.t.overstreet.law@gmail.com;
Pat O'Connell	pat.oconnell@westernresources.org;
Patricia Griego	Patricia.griego@epelectric.com;

Paulina Olivas	paulina@solarsmartliving.com;
Perry Robinson	Perry.Robinson@urenco.com;
Philip B. Simpson	philipbsimpson@comcast.net;
Phillip Oldham	phillip.oldham@tklaw.com;
Pollard, William	william.pollard@epelectric.com;
Prosperity Works- Ona Porter	Ona@Prosperityworks.net;
Raelynn Bean	rbean@cvecoop.org;
Randy Massey	masseyfarm@vtc.net;
Ricardo Gonzales	rico.gonzales@epelectric.com;
Rick Gilliam	Rick@votesolar.org;
Robert Castillo	rcastillo@cdec.coop;
Roberto Favela	roberto.favela@epelectric.com;
Rod Sgrignoli	rodney.sgrignoli@xcelenergy.com;
Roosevelt County Electric	rcec@rcec.coop;
Russ McKee	RMcKee@cvecoop.org;
Russell Fisk	Russell.fisk@prc.nm.gov ;
Ryan Centerwall	ryan.centerwall@affordable-solar.com;
Saif Ismail	sismail@cabq.gov ;
Sara Birmingham	sbirmingham@seia.org;
Saul J. Ramos	sramos@doeal.gov;
Sierra Electric	sierra@secpower.com;
Sierra Club – Ramona Blaber	Ramona.blaber@sierraclub.org;
Sky Stanfield	stanfield@smwlaw.com;
Socorro Electric	service@socorroelectric.com;
Sonya Mares	smares@hinklelawfirm.com;
Southwestern Electric	gary@alsuplawoffice.com;
Springer Electric	dsmith9346@zialink.com;
Steve Newby	snewby@zianet.com;
Steve Seelye	sseelye@theprimegrouppllc.com;
Steven Lunt	stevel@dvec.org;
Steven Rymsha	steven.rymsha@sunrun.com;
Sydney Wright	swright@nmag.gov;
Taiyoko Saidewic	Taiyoko@PositiveEnergySolar.com;
Thomas Moore	thom@fecnm.org;
Thorvald A. Nelson	tnelson@hollandhart.com;
Tim Dobson	tdobson@ad.nmsu.edu;
TKLaw office	tk.eservice@tklaw.com;
Travis Dorr	travis.a.dorr@xcelenergy.com;
Travis Sullivan	tsullivan@swec-coop.org;

Tri-State Generation and Transmission	kreif@tristategt.org;
TSgt Arnold Braxton	Arnold.Braxton@us.af.mil;
TSgt Ryan Moore	Ryan.Moore.5@us.af.mil;
Vidal Barela	vbarela@morasanmiguel.coop;
Vincent Martinez	vmartinez@tristategt.org;
Wade Nelson	WNelson@cvecoop.org;
Western Farmers Electric	matt.caves@wfec.com;
Will DuBois	Will.w.dubois@xcelenergy.com;
William Templeman	wtempleman@cmtisantafe.com;
WRA - Steve Michel	smichel@westernresources.org;
Zoe E. Lees	zoe.e.lees@xcelenergy.com ;

DATED this 31st of January, 2025.

By: /s/ Anne Haskins

Anne Haskins, Project Manager
Regulatory Policy and Case Management
Public Service Company of New Mexico

GCG#533369