



May 1, 2023

Electronically Submitted to [info@gridworks.org](mailto:info@gridworks.org) and [dshields@gridworks.org](mailto:dshields@gridworks.org)

Deborah Shields  
Communications and Operations Director  
Gridworks

Dear Gridworks Team:

Interwest Energy Alliance submits the attached information for consideration at the May 4<sup>th</sup> in-person workshop being held in Albuquerque, NM. Due to travel and other issues, Interwest is unable to attend the meeting, but hoped to provide some information for consideration.

For discussion within the statement of need, candidate resource and modeling input discussions, we have attached three documents.

- A whitepaper that Interwest and NMAREA submitted in the 2021 IRP, authored by Michael Goggin of Grid Strategies. Several broad areas of concern remain relevant in this IRP process:
  - Synergies between wind, solar, and storage must be accurately modeled.
  - Fossil resources are modeled as more reliable than is warranted.
  - Market availability and transmission interconnections must be adequately considered.
- A presentation that Interwest provided to the IRP public advisory process on August 17, 2022 by Michael Goggin.
  - This presentation focused on correlated outages of fossil generators and how to accurately account for and model this concern.
- Written comments that Interwest provided within the IRP public advisory process on September 7, 2022.
  - These written comments focused on the benefits of transmission expansion for PNM and its customers, and how transmission should be treated in the IRP how to accurately account for and model this concern so that resource selection includes all known costs and benefits on a level playing field.

Interwest appreciates the opportunity to provide this information. Interwest has been an active participant in the IRP process and looks forward to upcoming meetings on key issues.

Thank you again for your outreach efforts in your IRP planning process and willingness to consider participant input. We welcome the opportunity to engage in discussions on these and other key IRP issues to assist PNM in developing a strong and well supported IRP.

A handwritten signature in black ink that reads "Chris Leger".

Sincerely,

Chris Leger  
Staff Attorney  
[chris@interwest.org](mailto:chris@interwest.org)

Attachments