Action Plan Mapping

Stakeholder Input	Corresponding Section	Comments
Changing fossil fuel plants to long duration energy storage as environmental justice for impacted communities	1, 2, & 3	We concur with the intent of comment and while ability to change or add technologies at existing fossil fueled power production sites is dependent upon NMPRC approvals, PNM does believe that EJ factors should be considered in the RFP bid evaluation process and PNM will work with stakeholders to propose resources consistent with that process.
Collect distribution feeder level reliability metrics to understand reliability equity	9	Reliability at the feeder level is not a question of resource adequacy, but rather a function of investment in the distribution system, effectiveness of maintenance and repairs, as well as environmental conditions like wildlife interference or exposure to harsh weather conditions. These considerations are fundamentally important to PNM, but are not related to the IRP; therefore, they will be addressed in another forum.
Initiate public information effort regarding electricity sector changes and IRP process	5, 10	Communicating with customers and other stakeholders is an important function of PNM's commitment to transparency and engagement. Public participation in this IRP process has been robust and productive; we intend to continue promulgating information and soliciting feedback as part of the 2026 IRP. PNM is willing to make outreach and education commitments as a part of the action plan provided PNM and stakeholders can reach agreement on how this would occur, PNM's role, etc.

Explore availability of landfill gas as supplementary/replacement fuel	1, 2, 5, & 11	PNM is committed to a competitive process that examines all viable options for the benefit of its customers. With this in mind, resource opportunities sourcing landfill gas as a primary or supplementary fuel source would be eligible and welcome to respond to the all-source solicitation and PNM will continue to explore these opportunities in future planning processes.
Include extreme weather considerations during next IRP cycle	5	Extreme weather is inherently built into our strategy for diversified resource portfolios and the associated load forecasts and resource modeling that is performed for the IRP process. We recognize that extreme weather is having a greater impact on our reliability planning, including scenarios that stress both electrical supply and demand. PNM is committed to receiving input from stakeholders on areas of focus in the next planning cycle.
Explore benefits from participation in organized regional market, and from participation under extreme weather scenarios	8	PNM concurs with this comment. The IRP addresses benefits of participation in regional markets to manage resources, risks, and costs.
Incorporate consideration of correlated gas outages in next IRP cycle	5	As demonstrated in other parts of the country over the past several years, correlated outages can happen. Early analysis of loss of load expectation (LOLE) indicates that correlated outages represent a manageable risk that is aligned with reliability expectations prescribed by the IRP. PNM is committed to receiving input from stakeholders on areas of focus in the next planning cycle.
By 2026, PNM shall have a default time of day rate for all customer classes. PNM shall assess the success of the time of day pilot and develop a plan to enroll all customers on a time-varying rate.	N/A	While PNM fully intends to pursue time-of-day (TOD) pricing as a mechanism of empowering customers to control their electric bills and mitigate peak demand, this is not under the control of the IRP and cannot be included in the associated IRP Action Plan. Implementing a new rate or rate class requires approval of the NMPRC. PNM invites feedback related to pricing through its Pricing Advisory Committee (PRAC).
Achieve demand response impacts of 5% of peak demand by 2026. PNM currently achieves demand response reduction of approximately 3% of peak demand. To reach this goal, PNM should solicit new DR programs with flexible requirements. This new solicitation should go out by mid-2024.	1,6	PNM believes that DR and all DSM is an important aspect of decarbonization strategy overall and aligns with Action Plan item 6; however, rather than prescribe specific amounts of resource additions, demand response should compete againt other resources in a competitive process. The All-Source RFP contemplated in Action Plan item 1 will invite both demand side and supply side technologies to meet future resource needs. .

Develop a list of advanced geothermal developers and ensure they are contacted for future RFI's. Develop a relationship with the advanced geothermal development community in the state	1 & 2	PNM is committed to a competitive process that examines all viable options for the benefit of its customers. However, it would be inappropriate for PNM to single out a specific technology and provide an advantage not given to other technologies.
Work to solicit geothermal bids and bids for a variety of thermal storage technologies.	1 & 2	PNM is committed to a competitive process that examines all viable options for the benefit of its customers. However, it would be inappropriate for PNM to single out a specific technology and provide an advantage not given to other technologies.
Pumped Storage Hydro, CAES and long duration batteries are not currently realistic options. The following technologies are those that seem to be realistically available to PNM: Wind, PV, Li-ion (up to 4 hours economical); CT's; 8 hour pumped hydro. Converge on desired resource characteristics through the IRP process (rather than an IRP that includes potentially non-viable and speculative technologies), and then put out another RFI for narrowing to alternatives that are viable for inclusion in a future RFP and/or bilateral procurement where warranted.	2	This comment is more appropriately considered in the comment and feedback period for RFP instructions to bidders contemplated in NMAC 17.7.3.12
Hold a 2026 RFP for resources that will come online 2029 and beyond.	1	PNM concurs with this comment and believes it is fully addressed in the 2023 IRP Action Plan item 1.
Actively engage with evaluation activity for the most promising, maturing carbon free technologies like thermal or iron-oxide storage	2,11	PNM is committed to a competitive process that examines all viable options for the benefit of its customers. However, it would be inappropriate for PNM to single out a specific technology and provide an advantage not given to other technologies.
Share transmission assumptions with stakeholders and allow developers to give feedback and least-cost site projects.	12	PNM values insight and feedback from stakeholders to identify least-cost projects. Further, we recognize the importance of integrating transmission planning with our resource planning to ensure that the best, least-cost resources are accessible and that we account for associated transmission needs. However, PNM will not make transmission models, including assumptions, available to third parties. Due to the sensitive nature of critical energy

		infrastructure information (CEII), and PNM's interest in upholding a fair and competitive procurement process, information of this nature is best acquired through a formal CEII request with FERC and WECC. PNM will continue to explore the best way to further integrate transmission modeling into the IRP for planning its retail system.
Prioritize projects and resources that can locate in federally designated energy communities (supported by the Inflation Reduction Act) and deliver low-cost clean energy to while providing economic development in communities that are transitioning from a carbon-based economy.	1	PNM is enthusiastic about the opportunities available through the Inflation Reduction Act (IRA). We believe the financial benefits will help PNM to accelerate its transition to carbon-free portfolio while maintaining affordable costs for its customers. Due to the timing of the IRA, and competing priorities within the IRP, we are not inclined to make an explicit commitment in the IRP Action Plan; however, we intend to take full advantage of IRA programs, particularly in our energy communities, where these programs can be leveraged to even greater benefit. We intend to issue an all-source RFP that will attract multiple responses to produce a highly competitive process; subsequently, we may favor specific, desirable resource attributes through scoring factors.
Upgrade models and software so PNM can model 8760 hours during the capacity expansion phase. Due to software limitations, storage is not modeled holistically in PNM's IRP process	5	Changing our modeling software has repercussions that have not been fully assessed; therefore, we are not inclined to make this commitment in our IRP Action Plan. However, the comment has merit and may be considered separately. We further believe this is the type of discussion that could have merit in the modeling workshop(s) contemplated in Action Plan item5.
Refine modeling parameters including forced outage rates and chemical degradation over time for BESS resources	5	PNM is committed to receiving input from stakeholders on areas of focus in the next planning cycle. Unfortunately, formally incorporating every possible parameter into resource modeling would make the process untenable.
Include future PPA procurement in the modeling process in addition to the assumption that PNM will own new resources	1&2	The resource procurement method is not specified in the IRP (that is the IRP does not differentiate between ownership structures, this is determined in RFP processes which will continue to allow third party and utility owned bids).
Improve financial modeling so it accurately represents the cost difference between a 60-year lifetime resource and a 20-year lifetime resource	5	PNM is committed to receiving input from stakeholders on areas of focus in the next planning cycle.

Use a better transmission model. The current "ball and spoke" model is insufficient to the need for planning in the state	5&12	Changing our modeling software has repercussions that have not been fully assessed; therefore, we are not inclined to make this commitment in our IRP Action Plan. However, the comment has merit and may be considered separately. We further believe this is the type of discussion that could have merit in the modeling workshop(s) contemplated in Action Plan item5..
Establish a stakeholder modeling workshop (or series of workshops) that will kickoff no later than 9/15/2024 to inform modeling assumptions and protocols that will be utilized in the 2026 IRP.	5	PNM concurs with this comment and has incorporated it into the Action Plan.
Transition Resource Adequacy modeling to incorporate WRAP forward showing planning requirements and resource attributes no later than PNM's 2026 IRP.	4	PNM concurs with this comment and has incorporated it into the Action Plan.
Any assessment to add capacity to a PNM plant site should also commit to include surrounding sites that could potentially interconnect to the point of interconnection (surplus interconnection service) with a technology that does not fit within the current site footprint	N/A	PNM is not able to integrate this into its Action Plan. FERC provides resources for standard large generator interconnection agreements (LGIA), which define a formal path for interconnection. This policy has already been contemplated in early iterations of the current IRP rule and ultimately dismissed. The Open area transmission tariff (OATT) allows interested parties to submit applications and enter the queue through standard channels.
PNM should commit to attempt maximizing federal dollars coming into the state for the benefit of energy communities while balancing cost and reliability	N/A	We are generally in agreement with this comment though this is more related to procurement as opposed to IRP and as such this comment is better addressed through the RFP commentary period contemplated in 17.7.3.12. PNM is enthusiastic about the opportunities available through the Inflation Reduction Act (IRA). We believe the financial benefits will help PNM to accelerate its transition to carbon-free portfolio while maintaining affordable costs for its customers. We intend to take full advantage of IRA programs to the greatest extent possible while complying with overall procurement rules, particularly in our energy communities, where these programs can be leveraged to even greater benefit. (not a readily capable action for compliance)
Long lead time resources should be defined as those with construction and permitting timelines greater than six years, rather than reference a specific resource type. This includes pumped storage and transmission, as well as	1	We appreciate this comment; however, the appropriate mechanism to address specific types, terms, or other definitions related to resources is in the instructions to bidder section of a request for proposals (RFP) Section 17.7.3.12 of the IRP rule states that instructions to bidders will be offered to comment in the IRP docket prior to issuing the RFP)

technologies that are being built on a large scale and do not fit within the normal RFP or action plan timeline		
PNM should commit to having a transparent transmission modeling process that allows the public and interest groups to engage with modeling assumptions. Some aspects of this transparency might require the signing of confidentiality agreements to comply with federal regulations and laws, but those will not be unreasonably withheld from the public.	5	PNM values insight and feedback from stakeholders to identify least-cost projects. Further, we recognize the importance of integrating transmission planning with our resource planning to ensure that the best, least-cost resources are accessible and that we account for associated transmission needs. However, PNM will not make transmission models, including assumptions, available to third parties. Due to the sensitive nature of critical energy infrastructure information (CEII), and PNM's interest in upholding a fair and competitive procurement process, information of this nature is best acquired through a formal CEII request with FERC and WECC. PNM will continue to explore the best way to further integrate transmission modeling into the IRP for planning its retail system.
Commit to utilizing a new transmission model in the next IRP that is either internally developed or contract an improved model and/or software that can utilize the underlying transmission model to select "best path" transmission assets in resource planning.	5	Changing our modeling software has repercussions that have not been fully assessed; therefore, we are not inclined to make this commitment in our IRP Action Plan. However, the comment has merit and may be considered separately. We further believe this is the type of discussion that could have merit in the modeling workshop(s) contemplated in Action Plan item5..