

PNM Statement of Need and Action Plan Feedback Tracker



Issue Number	Status	Description	Category	Date Reported	Respondent	Comments
1	Closed	Provide energy amounts (MWh) in addition to capacity position (MW) (tables 1 and 2)	SON	6/17/2026	June Meeting	Addressed in the revised draft SoN
2	Closed	Explain how PNM is thinking about hydrogen conversion, infrastructure costs, and deliverability uncertainty	SON	6/17/2026	June Meeting	Will be discussed in 2026 IRP report
3	Closed	Break down expected load growth into segments (data centers, large loads, residential electrification, etc.)	SON	6/17/2026	June Meeting	Will be addressed in 2026 IRP report
4	Closed	Reconcile IRP gas capacity amounts with recent filings (resource application and supplemental RFP); explain why PNM believes a 2029 gas resource acquisition is realistic, given current supply chain conditions and PNM's contingency plans if gas doesn't come online by 2029	SON	6/17/2026	June Meeting	Addressed in the revised draft SoN.
5	Closed	Define short-duration storage, 4hr versus 8hr discharge rates, and applications	SON	6/17/2026	June Meeting	Will be addressed in the IRP report
6	Closed	Clearly describe what is in the baseline and the relationship to current procurement activities	SON	6/17/2026	June Meeting	Addressed in the revised draft SoN.
7	Closed	Explain where/how stakeholder input and requested modeling runs are reflected in PNM's analysis, and how stakeholder input impacted PNM's identified need	SON	6/17/2026	June Meeting	Addressed in the revised draft SoN.
8	Closed	Identify the time periods for the action plan, focus period, and planning horizon. How is PNM thinking about steps for long-lead resources? Include a timeline that illustrates when new resources are expected to come online	SON	6/17/2026	June Meeting	Addressed in the revised draft SoN.
9	Closed	Define the extreme economic growth scenario and reconsider how it is weighted in the analysis (should not be on equal footing as CTP and HEG)	SON	6/17/2026	June Meeting	Addressed in revised statement of need. Scenario has been defined in Stakeholder meetings and data postings and will be discussed in the IRP report.
10	Closed	Provide examples of emerging resources	SON	6/17/2026	June Meeting	Emerging resources that PNM evaluated will be addressed in 2026 IRP report.
11	Closed	Explain where/how stakeholder input and requested modeling runs are reflected in PNM's analysis, and how stakeholder input impacted PNM's identified need	SON	6/17/2026	June Meeting	Addressed in the revised draft SON
12	Closed	Explain how demand-side management is included in an all-source solicitation	SON	6/17/2026	June Meeting	Not applicable to SON. PNM will define the resource types eligible to its next RFP. Stakeholders are encouraged to provide comments during the RFP commentary period.
13	Closed	Specific targets, pilot programs, reporting metrics, etc. for EE and DSM (Items #7 and #8)	Action Plan	6/17/2026	June Meeting	Updates on the EE triennial plan, TOD pilot program, and the EV managed charging program are publically coordinated in other forums.

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14	Closed	Commit to a large load tariff that includes financial assurances and protections for existing customers	Action Plan	6/17/2026	June Meeting	Addressed in the revised draft AP
15	Closed	#3 – Work with developers and the Commission to consider alternative RFP structures (tiered or phased)	Action Plan	6/17/2026	June Meeting	Addressed in the revised draft AP
16	Closed	#8 – Identify specific goals for smart meter implementation, data-informed program development, and customer communication plans	Action Plan	6/17/2026	June Meeting	Being worked out through Grid Modernization Plan which is publically available along with status updates.
17	Closed	Commit to RFP criteria that prioritize technologies with tax credits	Action Plan	6/17/2026	June Meeting	PNM is technology agnostic so it can select the best plan for ratepayers
18	Closed	Add specific time frames for action plan items	Action Plan	6/17/2026	June Meeting	Added more specificity in revised draft AP
19	Open	More information on affordability and customer impacts of each scenario	SON	6/17/2026	June Meeting	In progress
20	Closed	#8, Default to TOD Rates. Bolster communication efforts on DSM implementation plans. Seek more media outlets and expert researchers venues; draw lessons learned from wildfire and public safety power cutoff campaigns.	SON	7/1/2026	Independent	While it does not specifically tie to the Action Plan it has been internally shared with the AMI team
21	Closed	Resources Categories, p. 3. Under firm dispatchable resources, define the list of technologies; specify "100-hour+ storage".	SON	7/1/2026	Linea Energy	Please see revised draft SoN
22	Closed	Range of Resource Needs by Future, p. 4. Which trajectory is PNM pursuing: baseline? CTP? HEG? Considering that the 2033-2036 RFP is meant to follow quickly after the 2029-2032 Supplement RFP, can PNM provide an indication of when/how the trajectory PNM is pursuing will be determined?	SON	7/1/2026	Linea Energy	Addressed in the revised draft SON
23	Closed	Current Trends and Policy Future, p. 5. "Steady load growth" – provide a breakdown of the drivers of load growth, including the percent driven by large loads. Provide as much transparency as possible regarding the load forecast	SON	7/1/2026	Linea Energy	Load Forecast will be a section in the IRP and the Working papers are on the Venue file exchange site
24	Closed	Stakeholder scenarios, p. 5. Specifically, these sensitivities expand the near-term variance for Carbon-Free resources, accelerate the overall demand for Dynamic Balancing flexibility, [insert] demonstrate the feasibility of portfolios without the gas resource assumed to be selected from the 2029-2032 Supplemental RFP...	SON	7/1/2026	Linea Energy	This was not a conclusion of the Stakeholder scenarios.
25	Closed	High Economic Growth Future, p. 6. provide some detail on what the high economic growth assumes relative to CTP in terms of load.	SON	7/1/2026	Linea Energy	Load Forecast will be a section in the IRP and the Working papers are on the Venue file exchange site
26	Closed	Stakeholder scenarios, p. 5. Under dynamic balancing resources, p. 6. Add: In addition, increasing selection of demand side resources (including TOU rates and increased behind-the-meter solar) results in a reduction of gas build by up to 80 MW and decreased the NPV by up to \$282 million compared to the CTP scenario.	SON	7/1/2026	Advanced Energy United	Rewritten in the revised draft SoN

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27	Closed	Background, p. 1. Under reliability, add: Due to growth in high load-factor (24-7) loads, weather variability, and fuel supply limitations, resource acquisitions with various capabilities may be required to ensure reliability in other hours.	SON	7/1/2026	WRA	Removed in the revised draft SoN
28	Closed	Resource categories, p. 3. Under firm dispatchable resources, either delete or clarify hydrogen, if commercially viable. Any scenario that includes hydrogen should include rigorous cost assumptions for hydrogen, including the cost of electrolyzers, storage, pipelines, and renewable energy to produce the fuel as utility costs.	SON	7/1/2026	WRA	PNM's H2 conversion already includes cost of electrolyzers, pipelines, and renewable energy to produce hydrogen. PNM's experts fully believe that hydrogen will be viable by the time PNM requires it.
29	Closed	Bridging the capacity need gap, p. 3. In opening paragraph, add: The model was permitted to only allow for alternative resource selections after 2032, and resources included in all PNM selected portfolios prior to 2033 were selected and locked into all model runs by PNM.	SON	7/1/2026	WRA	This is not true for the modeling analysis. The model was permitted to allow any viable candidate resources beginning in 2029. PNM also revised the draft SoN to clarify the selections that were locked into model runs.
30	Closed	Bridging the capacity need gap, p. 3. Under 2029-2032 System Resources, revise language to: These fixed inputs are PNM-owned and purchased projects that are proposed for near-term system reliability, pending final Commission regulatory approval, and which PNM has elected to lock into all modeling scenarios. These projects are fully embedded across all modeling cases, including the low forecast.	SON	7/1/2026	WRA	Addressed in the revised draft SoN
31	Closed	Bridging the capacity need gap, p. 4. Under 2029-2032 Supplemental Procurements, add: Regardless, the model selections here do not provide insight into resource options that may be alternatives to this gas generation, as these gas generation resources are fixed inputs in this IRP modeling.	SON	7/1/2026	WRA	Addressed in the revised draft SoN
32	Closed	Bridging the capacity need gap, p. 4. Under Generic Long-Term Resources, add: These are the only resources presented in PNM's portfolio modeling that are permitted to vary in the scenario and sensitivity analyses.	SON	7/1/2026	WRA	Addressed in the revised draft SoN
33	Closed	Range of Resource Needs, p. 4. Clarify definition of baseline: existing plus the 2 categories of incremental proposed acquisitions, penning PRC approval. Additional word edits suggested.	SON	7/1/2026	WRA	Addressed in the revised draft SoN
34	Closed	Current Trends and Policy Future, p. 5. Does "baseline" mean the same thing here? Is this perhaps a "benchmark" portfolio? Are you using "baseline" to refer to a set of generation resources as an input to the modeling, or a specific scenario or portfolio result?	SON	7/1/2026	WRA	Addressed in the revised draft SoN

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35	Closed	Stakeholder Scenarios, p. 6. Under firm dispatchable resources, add: This shows that the proposed near-term dispatchable resource additions proposed this year exclude the opportunity to evaluate alternative and more incremental alternatives to serve capacity needs through 2036.	SON	7/1/2026	WRA	The model was permitted to allow any viable candidate resources beginning in 2029. PNM also revised the draft SoN to clarify the selections that were locked into model runs.
36	Closed	High Economic Growth Future, p. 7. Clarify timelines for Focus Period, 2033 through 2036, and Planning Period, 2033 through 2045.	SON	7/1/2026	WRA	Addressed in the revised draft SON
37	Closed	Conclusion, p. 8. Add to opening paragraph: However, the modeling conducted only provides insight into alternative resource options after 2032.	SON	7/1/2026	WRA	The model was permitted to allow any viable candidate resources beginning in 2029;
38	Closed	Conclusion, p. 8. Clarify upcoming cycles, starting in 2033. Additional wordsmithing edits suggested.	SON	7/1/2026	WRA	Addressed in the revised draft SoN
39	Closed	Affordability and "least-regrets" framework, pp. 1-2. Implies that PNM is not serious about finding long-term, cost effective solutions to the ETA problem. Shifts the problem to the market and if the market does not supply a solution then???	SON	7/1/2026	NMPRC Staff	Addressed in the revised draft SoN. "least regrets" intent was to not unreasonable preclude options, including long-term, with an overly restrictive SoN.
40	Closed	Resource categories, p. 3. Recommend dropping the dynamic balancing resources. The ELCC for these resources is making their cost/benefit not attractive. Lump LDES into firm dispatchable resources, can be used for dynamic balancing or energy arbitrage along with being firm and dispatchable.	SON	7/1/2026	NMPRC Staff	PNM disagrees with that concept. These resources get selected because the cost/benefits contribute to defining a least-cost portfolio.
41	Closed	Range of Resource Needs by Future, p. 4. The resources needed are those that can supply 24/7 reliable power while meeting the ETA requirements by 2045 at a cost that is affordable. If PNM cannot demonstrate that that is possible then the SON should identify that the ETA or other laws must be amended or that exceptions to the rules may be needed by 2044.	SON	7/1/2026	NMPRC Staff	PNM categorizes long duration storage as a firm dispatchable resource. The SoN was revised to note that some technologies have characteristics that fit in more than one operational category.
42	Closed	Table 2, Generic Resource Attributes, p. 4. PNM should state in the SON exactly what they believe to be the end resource position in 2045, with and without a fueled resource; demonstrate how much storage (GWhrs) capacity is necessary to sustain the system	SON	7/1/2026	NMPRC Staff	SoN revised to clarify technologies and approximate amounts that are selected over the planning period ending in 2045.
43	Closed	Resource categories, p. 3. PNM should identify the specific resource types selected in the modeling. Reporting need solely by functional category, without the underlying resource composition that the modeling already contains, obscures that the Focus Period need is weighted toward renewables, energy efficiency, and storage and includes no new gas or nuclear.	SON	7/1/2026	NMAREA	Addressed in the revised draft SON. Please see Figure 6 - Range of Resource Needs Based on CTP Sensitivities through 2036

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44	Closed	Range of Resource Needs by Future, p. 4. should also be presented on an accredited (firm) capacity basis and an energy (GWh) basis. Presenting need in nameplate MW while measuring adequacy in accredited capacity is internally inconsistent and obscures what the resources actually contribute to reliability and to serving load.	SON	7/1/2026	NMAREA	IRP report will included accredited capacity and energy role of technologies. All details are not needed for the SoN.
45	Closed	Table 2, Generic Resource Attributes, p. 5. include the LEG (Low Economic Growth); omits the low case, which presents an unbalanced view of the range PNM modeled. The LEG result, that baseline resources and active procurements are sufficient through the Focus Period and beyond, is directly relevant to the amount of near-term procurement that is actually required and belongs in the same table as the upside cases.	SON	7/1/2026	NMAREA	LEG table has been added.
46	Closed	High Economic Growth Future, Focus Period, p. 8. This is introduced as "above the CTP," but appears to be the range above the baseline. (The above-CTP range is presented as 604-817 in Table 2 and the HEG summary in the conclusion)	SON	7/1/2026	NMAREA	Addressed in the revised draft SON
47	Closed	High Economic Growth Future, Planning Period, p. 8. 181 MW, This number appears to be incorrect. See the CTP section in Table 2, where the number is 536. Same 536 appears at the very top of page 7 in the CTP description	SON	7/1/2026	NMAREA	Addressed in the revised draft SON
48	Closed	Conclusion, p. 9. Procurement beyond the committed 2029-2032 resources should be triggered by demonstrated and committed load growth rather than by the upper bounds of the High Economic Growth or Extreme Economic Development sensitivities.	SON	7/1/2026	NMAREA	Addressed in the revised draft SON
49	Closed	#3, next all-source RFP. RFP that allows for a longer term online target date for geothermal or other clean firm bids? Limited to a 3-year window only?	Action Plan	7/1/2026	WRA	Action plan RFP covers 4 years period starting 2033. It will be up to bidders to determine if viable projects are available in this time-frame. The IRP and RFP cycles follow the requirements of the IRP rule which provides for stakeholders to provide input on the RFP.
50	Closed	#3, next all-source RFP. Highlight the importance of prioritizing capturing tax credit-eligible storage projects. Add: ...prioritizing renewable projects facing tax credit deadlines to maximize ratepayer benefits.	Action Plan	7/1/2026	Linea Energy	PNM is technology agnostic so it can select the best plan for ratepayers

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51	Closed	#4, partnerships for emerging resource development. Add: PNM will study the feasibility and assumptions associated with gas to hydrogen conversion.	Action Plan	7/1/2026	Linea Energy	Assumptions are based on best available data and come from industry experts. As technologies develop this information is updated and will be revisited in future IRP's. Item 4 is included to help focus on solutions to challenges of advancing emerging technologies.
52	Closed	#9, annual reporting. Also include reporting on annual compliance with ETA mandates.	Action Plan	7/1/2026	Linea Energy	Docket 26-000039-UT demonstrates PNM's CO2 compliance. Duplication in the action plan is unnecessary.
53	Closed	RFP will identify the demand-side resource types eligible to respond and describe how PNM will evaluate those resources. Prior to issuing this RFP, PNM will publish its proposed accreditation methodology for demand-side resources for stakeholder comment	Action Plan	7/1/2026	SWEEP	Expanded on Action Plan item 3.
54	Closed	#7, demand side initiatives. With stakeholders, PNM will develop a demand-side and DER implementation roadmap addressing energy efficiency, demand response, managed EV charging, customer-sited storage, VPP/DER aggregation, and other flexible load resources (potential programs, tariffs, or pilots). Will evaluate whether a grid services tariff, VPP pilot, or other compensation mechanism will enable DERs/DSM.	Action Plan	7/1/2026	SWEEP	More specifics have been added to Action Plan on demand-side management efforts. With substantial efforts already in progress on Grid Modernization including AMI implementation, additional DR programs and energy efficiency initiatives, expanding on these is not warranted.
55	Closed	New item, demand-side resources capacity accreditation. PNM will publish for stakeholder comment, its capacity accreditation method for demand-side resources. To address both summer and winter seasons, comparable in rigor and transparency to PNM's ELCC-based accreditation approach for supply-side storage resources, will explain how seasonal reliability-hour availability is quantified. Publish its methodology at least 90 days before issuing the 2033-2036 All-Source RFP.	Action Plan	7/1/2026	SWEEP	PNM does not believe a separate action item is warranted. The IRP report includes information on ELCC methodology and calculations used for resource planning purposes which will be available more than 90-days before an RFP is issued. For the 2026 IRP, PNM has provided accredited capacity for DSM options. PNM has not calculated accredited capacity for sub categories for RFP purposes. PNM provides accredited capacity information in the instructions to bidders for its next RFP solicitation subsequent to acceptance of the SON and AP for the 2026 IRP. Stakeholders are encouraged to provide comments during the RFP commentary period.

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56	Closed	#8, Default to TOD Rates. Add to Pricing Advisory Committee scope: customer protections, customer education and outreach. Include opt-out rates, load shifting, bill impacts, and peak reduction in metrics.	Action Plan	7/1/2026	SWEEP	Addressed in the revised draft AP
57	Closed	#9, annual reporting. Annual reports include progress on demand-side and DER implementation, including EE savings, DR enrolled MW and accredited capacity where applicable, TOD participation and opt-out rates, managed charging participation, customer-sited storage and VPP/DER aggregation participation, non-confidential RFP participation by demand-side resource.	Action Plan	7/1/2026	SWEEP	Annual updates on PNM's demand side efforts are publically available through other required filings. Including in IRP Action Plan is duplicative.
58	Closed	Add to #1 - 1.PNM will continue to pursue the necessary regulatory approvals and advance construction efforts to support the timely commercial operation of resources included in the Application for 2029-2032 System Resources and Abandonment of Four Corners Power Plant.	Action Plan	7/1/2026	WRA	Accepted
59	Closed	#4, partnerships for emerging resource development. Edits to working group scope: ...to support the deployment of emerging zero carbon resources including fusion and enhanced geothermal and transmission expansion in New Mexico.	Action Plan	7/1/2026	Pacific Fusion	Edits included with item 4. Due to its ambiguity "longer term planning principles" is not defined. PNM requires more specificity in order to determine if this is warranted
60	Closed	#7, demand side initiatives. Editing changes: best efforts, programs that are achievable and available to PNM...	Action Plan	7/1/2026	WRA	PNM slightly reworded this idea into the Action Plan under the DR and EE items. PNM felt its approach is consistent with NMPRC's current rules.
61	Closed	#3, next all-source RFP. Should add: "or to procure resources that will start construction in the 2033-2036 timeframe to meet system needs in 2045 and beyond."	Action Plan	7/1/2026	NMPRC Staff	Expanded action plan item #4.
62	Closed	#6, EDAM participation, resource adequacy proposal. This is a slippery slope if the EDAM starts mandating PRMs (like SPP imposes on SPS). Also, ELCC control may be relegated which can also limit the value of high quality NM resources.	Action Plan	7/1/2026	NMPRC Staff	No action required.
63	Closed	#8, opt out TOD rates. Not sure if this is an IRP action. TOD may have very little impact on overall resource needs.	Action Plan	7/1/2026	NMPRC Staff	No action required.
64	Closed	#3, next all-source RFP. scope and timing of resources procured under this RFP should be scaled to demonstrated and committed load growth, rather than to the upper bounds of the high economic growth or extreme economic development sensitivities.	Action Plan	7/1/2026	NMAREA	This was reflected in the revised draft SoN
65	Closed	#3, next all-source RFP. provide an estimate of the revenue requirement and customer rate impact of the resources identified to meet 2033-2036 focus-period needs, evaluated on a full revenue-requirement basis	Action Plan	7/1/2026	NMAREA	Addressed in the revised draft SoN.

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66	Closed	#5, transmission alternatives. including how each transmission alternative affects portfolio costs and whether, and to what extent, building new transmission eliminates or reduces other resource needs	Action Plan	7/1/2026	NMAREA	PNM will provide appropriate information justifying the basis for any facilities sought under a regulatory filing.
67	Closed	#6, EDAM participation, resource adequacy proposal. PNM will evaluate the impact of the regional resource adequacy program on its planning reserve margin and long-term reliability planning metrics, and will report that evaluation to stakeholders for incorporation into its next IRP.	Action Plan	7/1/2026	NMAREA	Accepted, but reworded.
68	Closed	#9, annual reporting. include the actual revenue requirement and customer rate impact of resources as they are acquired.	Action Plan	7/1/2026	NMAREA	These reports are more appropriate for the application of the resource filing rather than IRP Action Plan status updates.
69	Closed	#4, partnerships for emerging resource development. Add "longer term planning principles" to working group scope and support emerging clean energy resource development.	Action Plan	7/1/2026	WRA	Edits included with item 4. Due to its ambiguity "longer term planning principles" is not defined. PNM requires more specificity in order to determine if this is warranted
70	Closed	#4, partnerships for emerging resource development. Add "public and private" partnerships"	Action Plan	7/1/2026	NMPRC Staff	Added to Acton Plan Item 4
71	In Progress	Bridging the Capacity Need Gap, p. 4. Statement of Need contains no cost information. PNM should disclose the estimated revenue requirement and customer rate impact of each tier of resources, including the filed 2029-2032 System Resources, the 2029-2032 Supplement, and the Focus Period generic resources, shown against PNM's currently approved revenue requirement, so that stakeholders and the Commission can evaluate the affordability of the plan PNM is recommending.	SON	7/1/2026	NMAREA	Under review. PNM will determine how to incorporate it into the 2026 IRP report
72	In Progress	New item, transmission planning and operations. For purposes of its next integrated resource planning and transmission planning processes, PNM will: (a) evaluate any recommendations for transmission upgrades or new transmission corridors relevant to PNM's system that are identified in the WestTEC 10-year and 20-year expansion plans; and (b) assess adoption of a "flow-based" approach to transmission planning, utilization and congestion assessment.	Action Plan	7/1/2026	WRA	This will be considered in the 2029 IRP planning cycle as an improvement to the process. Will take this request forward. PNM is working to move to flow-based transmission operations.