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September 1, 2026

Ms. Melanie Sandoval
Records Bureau Chief

Subject: Public Service Company of New Mexico's Integrated Resource Plan for the 2026-2045 Planning Period, Docket No. 25-00022-UT

Dear Ms. Sandoval:

Public Service Company of New Mexico ("PNM") hereby files with the New Mexico Public Regulation Commission ("Commission") its 2026 Integrated Resource Plan for the 2026-2045 planning period ("2026 IRP"), including PNM's Statement of Need and Action Plan. This compliance filing is being made pursuant to 17.7.3 NMAC, which requires each public utility supplying electric service to customers to file an integrated resource plan every three years.

The Commission established Docket No. 25-00022-UT for PNM's 2026 IRP process. PNM conducted a facilitated stakeholder process in the development of the 2026 IRP and is filing the plan in accordance with the approved deadline of September 1, 2026.

The 2026 IRP is being distributed to the parties included on this docket, as well as to those individuals who participated in PNM's facilitated stakeholder process and provided their email to PNM. PNM is also posting an electronic copy on its website at www.pnm.com/2026-IRP.

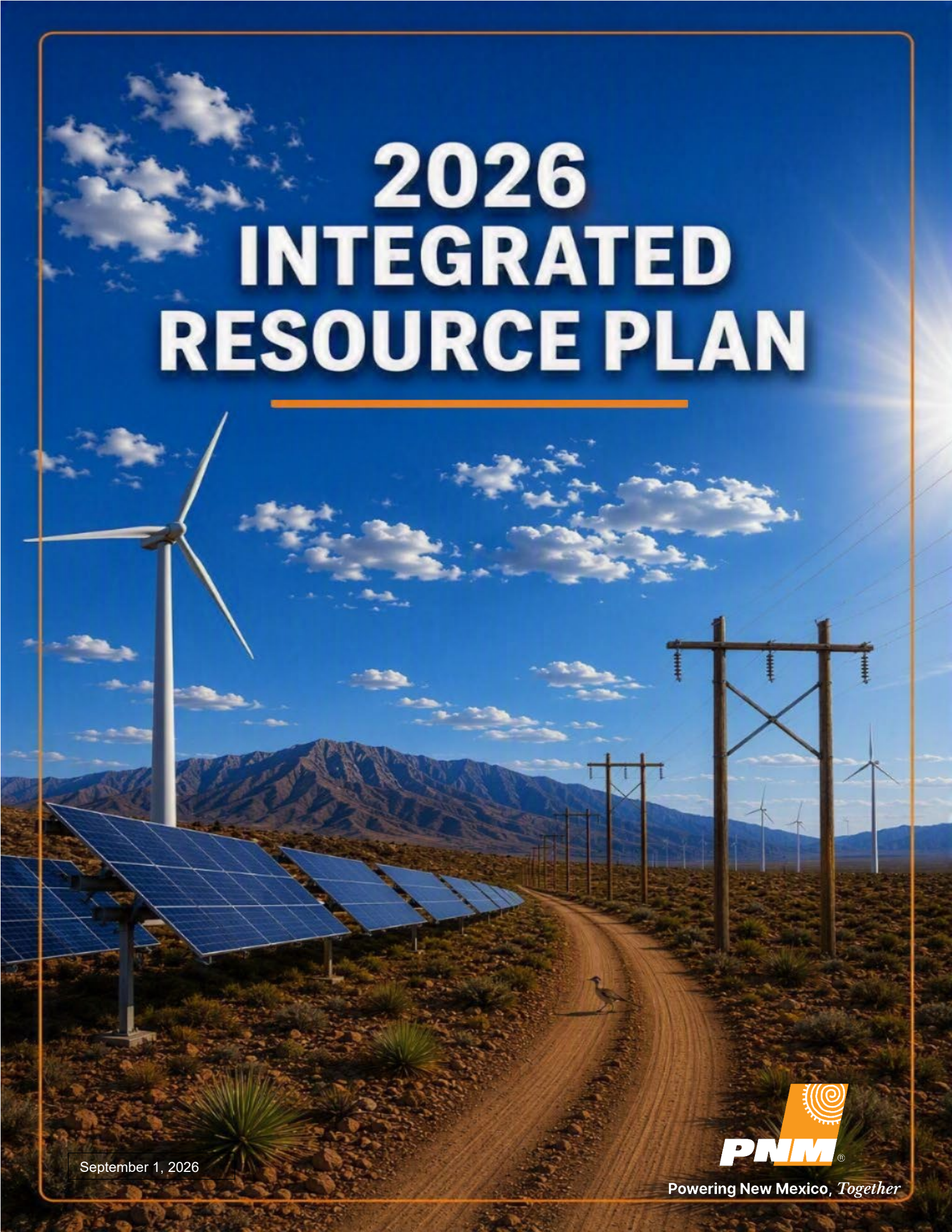
This filing is being made electronically. If you have any questions, please contact me at lisa.contreras@pnm.com.

Respectfully submitted,

/s/ Lisa Contreras
Lisa Contreras
Senior Manager
Regulatory Policy and Case Management

CC: Service List

2026 INTEGRATED RESOURCE PLAN



September 1, 2026

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Safe Harbor Statement

Statements made in this document that relate to future events or Public Service Company of New Mexico's (PNM's) expectations, projections, estimates, intentions, goals, targets, and strategies are made pursuant to the Private Securities Litigation Reform Act of 1995. Readers are cautioned that all forward-looking statements are based upon current expectations and estimates. Because actual results may differ materially from those expressed or implied by these forward-looking statements, PNM cautions readers not to place undue reliance on these statements. PNM's business is influenced by many factors, often beyond PNM's control, that can cause actual results to differ from those expressed or implied by the forward-looking statements. For a discussion of risk factors and other important factors affecting forward-looking statements, please see PNM's Form 10-K and Form 10-Q filings with the Securities and Exchange Commission, the factors of which are specifically incorporated by reference herein.

PNM assumes no obligation to update this information, except to the extent the events or circumstances constitute material changes in the Integrated Resource Plan that are required to be reported to the New Mexico Public Regulation Commission pursuant to Rule 17.7.3.8(E) of the New Mexico Administrative Code.

ACKNOWLEDGEMENTS

PNM appreciates the organizations and individuals that contributed to the 2026 Integrated Resource Planning process. The PNM team thanks each of you for your time and for lending your expertise to move New Mexico forward on the pathway to decarbonization. Insights from these participants contributed to creating a well-founded Integrated Resource Plan with new milestones on moving to an Integrated System Plan:

- First and foremost, the participants in the Facilitated Stakeholder Process workshops and office hours provided input to help shape the IRP's Statement of Need and Action Plan.
- Gridworks, who led the Facilitated Stakeholder Process for helping coordinate each workshop and office hours meeting while ensuring stakeholder input and comments were recognized and discussed.
- Energy and Environmental Economics, Inc. (E3) provided invaluable guidance in workshop information provided to stakeholders and development of the IRP report, drawing on its extensive experience supporting utilities throughout the Western US.
- PowerGEM, LLC. provided key reliability inputs, analysis and expertise on portfolio outcomes and supported discussion with stakeholders.
- CDG Engineers, Inc. supplied technical, analytical and modeling support throughout the IRP process, including scenario development, data analysis, and the evaluation of planning assumptions.
- Siemens, ICF, EPRI, and Itron contributed to the development of commodities & pricing, demand side resources, resource technology costs, and load forecasts.

Planning for a carbon-free grid is a significant challenge and requires collective efforts to solve it. Thank you again for your contributions and I look forward to completing the 2026 IRP Action Plan and beginning work towards the 2029 IRP.

Thank you,

Thomas P. Duane

Director, Integrated Resource Planning

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EXECUTIVE SUMMARY

Public Service Company of New Mexico's (PNM) 2026 Integrated Resource Plan (IRP) presents a comprehensive and forward-looking strategy to reliably and efficiently serve projected customer demand while achieving New Mexico's clean energy requirements by 2045. The 2026 IRP is being developed against a markedly different planning landscape than the 2023 IRP. National and regional demand growth continues to accelerate, while resource development and transmission expansion now require longer lead times. Supply-chain constraints and federal policy dynamics, including the One Big Beautiful Bill Act (OBBBA) and import tariffs, continue to affect project economics and timing. Economic development interest in the state is rising, and New Mexico has adopted a range of new policies to help capture that opportunity. At the same time, reliability risks are becoming more dynamic as the portfolio incorporates higher levels of variable and energy-limited resources.

PNM's last IRP was filed with the New Mexico Public Regulation Commission (NMPRC or Commission) in December 2023, mapping the utility's resource planning from 2023 to 2042, which was accepted by the NMPRC in April 2024. Subsequently, PNM filed a Notice of Material Event arising from updated demand and energy load forecasts that demonstrated a material increase to PNM's expected load needs about a month later. That resulted in PNM's October 2024 filing of its updated 2023-24 IRP Supplemental Analysis, which was based on both revised modeling and associated Statement of Need.

Three years later, PNM remains firmly committed to transitioning to the state mandated goal of a carbon-free system and has achieved a significant reduction in its carbon intensity and is currently operating its portfolio to meet the 400 lbs/MWh compliance requirement. Presently PNM has successfully fulfilled the 40% RPS goal and projects not only to remain in compliance but exceed the next milestone (50%) by 2030. In the intervening years, PNM has continued to transition its portfolio with the energization of its approved 2026 Resource Portfolio (Docket No. 23-00353-UT), which includes 410 MW of new installed resources, including 310 MW of new 4-hour Battery Energy Storage System (BESS), and 100 MW of new solar resources. Additionally, development and commercial execution is progressing on 617 MW of resources approved in the 2028 Resource Filing (Docket No. 24-00271-UT). These additions include 350 MW of new 4-hour BESS, 100 MW of new solar, and the continuation of the 167 MW Valencia Energy Facility (VEF). PNM also had an additional resource filing (Docket No. 25-00048-UT) for 290 MW of new solar resources and 268 MW of new 4-hour BESS for PNM's Rate 36B Special Service Contract customer. In total, since the 2023 IRP, PNM has added or obtained approval for 1,585 MW of new resources.

In mid-2026, PNM filed for approval of its 2029-2032 Resource Portfolio (Docket No. 26-0000114) to replace PNM's 200 MW interest in Four Corners Power Plant (FCPP), serve new load demand, diversify the portfolio, and lower the portfolio's carbon intensity by approximately 50% by 2032, to 200 lbs/MWh. That portfolio includes 800 MW of new wind generation, 240 MW of new solar, 610 MW of new 4- and 8-hour BESS, and a 40 MW new natural gas resource (depreciated by 2044). PNM's proposed new resource additions allow PNM to continue to meet its 0.1 Loss of Load

Expectation (LOLE) standard and is currently pending NMPRC consideration. PNM evaluated and recommended extension of the Reeves Generating Station (Reeves) in considering the overall needs in this timeframe. Without the extension, additional resources would have been needed in the overall filing.

PNM has continued to build operating experience with renewable and short-duration storage technologies and identified plans to exit its interest in the FCPP, the last remaining coal plant and most carbon-intensive resource currently in the portfolio. While the Inflation Reduction Act (IRA) helped provide federal tax benefits that supported many of PNM's resource developments in these intervening years, the tax-advantaged pricing going forward is set to phase out as a result of the OBBBA.

PNM's 2026 IRP highlights several new planning advancements as well. Similar to prior IRPs, PNM outlines a Most Cost-Effective Portfolio (MCEP), but along with that more traditional planning element, this IRP also advances a much more dynamic planning framework that outlines how PNM will adjust its plan over time as resource needs, risks, and decision pathways evolve over the next three years, and the future continues to come into sharper focus. This dynamic framework will be used to support future filings and ensure transparency to stakeholders across the range of potential future outcomes the system may experience. This approach allows PNM to reliably serve customers, comply with state policy, manage affordability, support economic development, all while retaining the flexibility necessary to respond to a rapidly changing electric industry. A static MCEP in this planning environment is insufficient, on its own, for scoping adequately broad procurement solicitations aimed at filling future resource needs.

The enhancements to PNM's 2026 IRP continue beyond the decision framework noted above. For this IRP cycle, PNM enhanced its planning framework by expanding the consideration of demand-side resources, improving transmission analysis, evaluating customer affordability, and incorporating the results of its 2029-2032 all-source Request for Proposals (RFP). Building on the deployment of Advanced Metering Infrastructure (AMI), PNM expanded its ability to model future Demand-Side Management (DSM) programs, supported by an Energy Efficiency (EE) and Demand Response (DR) Potential Study prepared by Inner City Fund (ICF) International that identified seven new DR programs and extensions of two existing programs beginning in 2030. PNM also strengthened its transmission planning process by supplementing its traditional zonal modeling approach with a nodal transmission model that evaluates system losses, renewable curtailment, congestion hours, and congestion costs, enabling more accurate assessment of transmission needs and resource siting impacts. Affordability and the cost impact to customers is a core planning objective alongside reliability and environmental performance, recognizing the challenges associated with rapid load growth, electrification, clean energy transition requirements, and infrastructure investment needs. The IRP evaluates portfolio costs, risks, and customer impacts across a range of future scenarios, diversified resource portfolios, demand-side resources, market participation, strategic transmission investment, and flexibility in procurement decisions. Together, these enhancements provide another level of planning process maturity to continuously improve resource, transmission, and customer affordability considerations and support PNM's objective of developing a reliable, cost-effective, and environmentally responsible resource plan that can adapt to changing system conditions and customer needs.

Over the next six years, PNM's portfolio is poised to undergo a significant transformation, as noted by the large amount of renewable and storage resources coming online between now and 2031, the planned exit from FCPP, while load is projected to grow significantly and the progress on both the RPS and carbon intensity requirement continues to tighten. To meet those challenges, PNM has developed an Action Plan that carries forward the practical steps needed to implement the 2026 IRP while preserving necessary flexibility for future decisions.

Key actions include continuing competitive procurement for resources much further in advance than traditionally done to mitigate supply chain challenges; pursuing regulatory approvals needed to implement selected resource portfolios; advancing DSM, and customer programs enabled by grid modernization; evaluating large-load tariff and service agreement structures; continuing participation in regional market development, including the California Independent System Operator's (CAISO) Extended Day-Ahead Market (EDAM) implementation activities; refining reliability and resource adequacy metrics; advancing transmission and advanced grid technology analysis; and continuing to monitor emerging clean firm and long-duration storage technologies through future market-tested solicitations. The action plan also includes efforts designed to elicit state-wide help in speeding emergent technologies to commercialization to ensure PNM can maintain long-term reliability with needed firm, dispatchable generating resources.

Charting the Path Forward

As in 2023-24, this 2026 IRP was developed against an industry landscape which continues to rapidly evolve. The most important development in the industry in recent years has been the passage of OBBBA which largely reversed many of the advantageous benefits of the IRA. This equally impactful federal legislation phases out many of the incentives previously available to aid in the development of new clean energy resources. Despite the OBBBA reversals or phase outs, PNM must continue to invest in clean energy resources through the next two decades to ensure it is able to meet the requirement to be carbon free by 2045. This is likely to challenge customer affordability as federal tax credits phase out, likely increasing costs for clean resources in the future. This near-term setback must be met with efforts to find ways to speed commercialization of other technologies and seek novel cost offsets for customers.

The passage of the OBBBA has created real-world challenges for utilities and project developers by setting very stringent phase out requirements. PNM has attempted to capture as many of those benefits as possible in its 2029-2032 resource portfolio, but costs for new infrastructure projects continue to rise outside of tax credit benefits as well. This continues to be driven by a combination of global supply chain shortages and global demand, both of which are increasing energy equipment and material lead times. Additionally, inflation and various federal import tariffs continue to increase costs of equipment and materials, much of which is manufactured outside of the US. Interest rates remain high and do not show signs of a reversal anytime soon. These changes have also impacted development timelines for projects already under development, and in some cases, threatened in-service dates and even project viability altogether.

In the face of these challenges, PNM remains committed to the vision for a reliable, affordable, and carbon-free power supply by 2045 and will endeavor to consider all viable options to manage

affordability while ensuring reliability and environmental compliance. Therefore, this IRP is focused on the opportunities ahead but remains cognizant of the risks and ensuring proper protection of customer reliability and system resilience. Urgent action is required, as many of the viable options require years of lead time and preparation to successfully integrate into PNM's portfolio. Permitting and development timelines require years to complete, and in recent years, have continued to stretch, often beyond historical norms. This means that the 2033-36 system must be planned and developed today. Achieving the goals of a reliable, sustainable, and affordable portfolio requires proactive planning and sustained action.

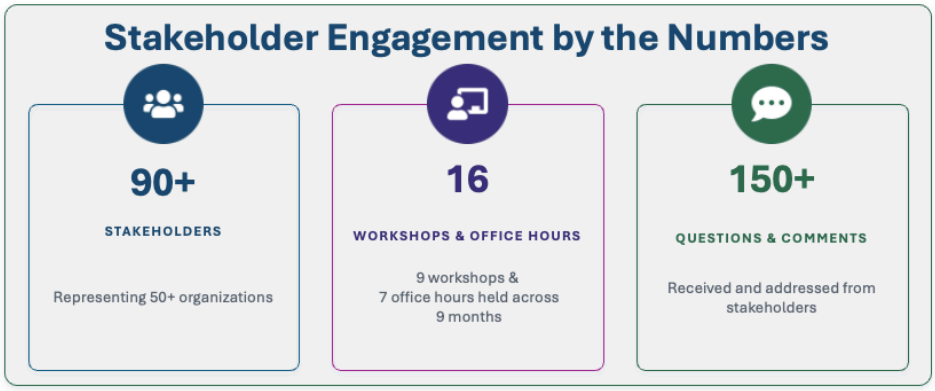
In an environment that can change suddenly and unexpectedly, PNM seeks to create a plan that is flexible and adaptive. The value of a comprehensive planning framework lies not only in the plan it produces, but also in the guidance it provides for adapting the plan in response to evolving system conditions.

The Policy Landscape

PNM's primary regulatory obligations for Integrated Resource planning are specified in the NMPRC's IRP Rule, 17.7.3 NMAC, which establishes requirements for the resource planning process of investor-owned utilities in New Mexico. The IRP Rule specifies a requirement for IRPs to include a **Statement of Need**, which defines the necessary resources, as determined by the utility. The statement of need is a general description of the resources that PNM anticipates needing to satisfy its planning goals; it builds upon the MCEP, which prescribes resource needs in a more static fashion. The Statement of Need can serve as a bridge between the IRP and procurement via RFPs or other solicitations. It also clearly communicates to stakeholders the categories of resources needed by PNM to achieve the planning objectives.

Additionally, the facilitated stakeholder process encouraged transparency to the utility's planning process and engagement with parties who have an interest in utility planning decisions. Pursuant to this provision, the NMPRC appointed Gridworks to serve as PNM's independent facilitator. With Gridwork's assistance, broad access and organized dialogue were shared with those who are invested in and impacted by PNM's resource plans. Over the course of the 9-month stakeholder process, dozens of participants provided questions and input to the process. Figure ES-1 highlights stakeholder engagement in the 2026 IRP facilitated stakeholder process.

FIGURE ES-1. HIGHLIGHTS OF THE 2026 IRP FACILITATED STAKEHOLDER PROCESS



Resource Planning Framework

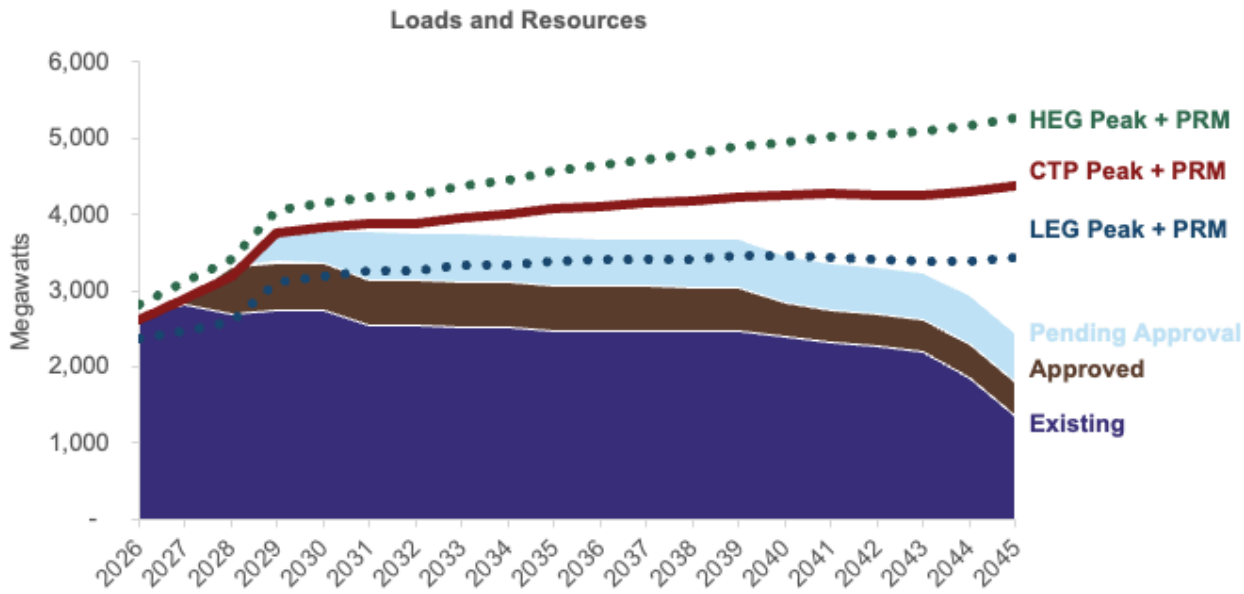
PNM's planning process seeks to balance three primary objectives: maintaining affordability, ensuring reliability, and reducing environmental impact. Table ES-1 describes each of these objectives in further detail.

TABLE ES-1. KEY OBJECTIVES OF THE IRP PROCESS

Objective	Description
Reliability	PNM customers expect steady, reliable electric service. To meet this expectation, PNM plans its system to maintain a LOLE of one day in ten years, aligned with industry standards; doing so requires PNM to plan the generation portfolio to meet customers demand all hours of the year, under varying weather and system conditions. PNM expects to retire significant portions of the existing fossil generation portfolio over the planning horizon; the company will need to add new resources that can reliably supply customer demand and energy needs.
Affordability	Customer affordability is a key consideration in PNM's Integrated Resource Plan as load growth, infrastructure investment needs, resource transition requirements, supply-chain challenges, and changing policy incentives continue to increase cost pressures. PNM considers a range of strategies to mitigate customer impacts such as large-load tariffs, flexible load programs, customer sited resources, diversified portfolios, strategic transmission investments and exploration of mechanisms that may reduce financing costs. Recognizing that future conditions may change, PNM emphasizes portfolio flexibility by focusing on common resource needs and attributes rather than committing to specific technologies prematurely. This approach supports future portfolio optimization as market conditions and technologies evolve. The utilization of rate impacts can further inform planning by providing an illustrative view of potential customer impacts, helping identify opportunities to manage resource planning decisions.
Environmental Impact	PNM is required to achieve a 100% carbon-free generation portfolio by 2045. In calendar year 2025, the generation portfolio achieved 80% of customers' total annual energy needs with carbon-free electricity. PNM's plan must continue to demonstrate reasonable and consistent progress through the planning horizon to ensure the targeted goal in 2045 is met.

Figure ES-2 below graphically shows PNM's resource position through the planning horizon as compared to expected load growth plus planning reserve margin across the three futures evaluated in this IRP. PNM's existing, approved and pending approval of resources prior to 2033 meets PNM's requirements under the Current Trends & Policy (CTP) and Low Economic Growth (LEG) futures but shows a short position if additional load growth materializes, as contemplated in the High Economic Growth (HEG) future. For the CTP future, system resource needs begin in the early to mid-2030's, continue to grow over time, and become significant as many natural gas-fired firm dispatchable resources exit the portfolio by end of 2044 in order to help meet the state-mandated carbon free requirement by 2045.

FIGURE ES-2. PROJECTED LOAD FUTURES AND APPROVED OR RESOURCE ADDITIONS



The different technologies needed to reliably serve customer demand and support the transition to a carbon-free portfolio fall into three general categories:

Low-Cost Carbon-Free Energy Resources produce clean energy to meet most of PNM customer's energy needs throughout the year. In 2025, PNM's delivered energy was roughly 80% carbon-free, of which solar and wind make up the majority. Meeting the 100% carbon-free goal by 2045 requires continued investment in resources able to generate carbon-free energy like solar or wind or save energy such as energy efficiency options.

Dynamic Balancing Resources provide PNM with tools to dynamically balance the supply and demand for electricity on an instantaneous basis, recognizing that the generation profiles of many of the carbon-free resources do not coincide naturally with electricity demand. Examples include shorter-duration BESS and DR.

Firm Generating Resources can operate at or near full capacity for extended periods of time to PNM to maintain reliability even under the most constrained conditions in the system, which may include both periods of high demand as well as periods of low output from renewable resources. Today, these needs are met mostly with nuclear and fossil resources; in the future, various emerging technologies including enhanced geothermal, nuclear or fusion technology, hydrogen, or long-duration storage may also be options.

Transmission and Distribution Considerations

The development of new generation and storage resources at the scale needed to meet the challenges ahead has implications for other parts of the system. In particular, new resources added to decarbonize the generation mix and meet growing loads will require excluding technologies that would need to be located remote from load centers without expansion of the

transmission system to allow for the delivery of electricity. The existing transmission system is already constrained at various times, and many of the resources that may help satisfy future needs are in areas that require new transmission investments. Additionally, new transmission connections to neighboring entities and regional markets expand locational diversity helping to ensure PNM can more efficiently achieve the goals of the ETA by optimizing and dynamically sharing resources across a larger geographical area.

In addition to transmission, PNM continues to link its planning processes and as such, this IRP is connected to PNM's Distribution System Plan (DSP) and Grid Modernization Plans through its evaluation of distribution-sited alternatives in concert with transmission-sited alternatives, consistent with the Commission's directive that distribution and resource planning be evaluated together to identify the most efficient solutions.

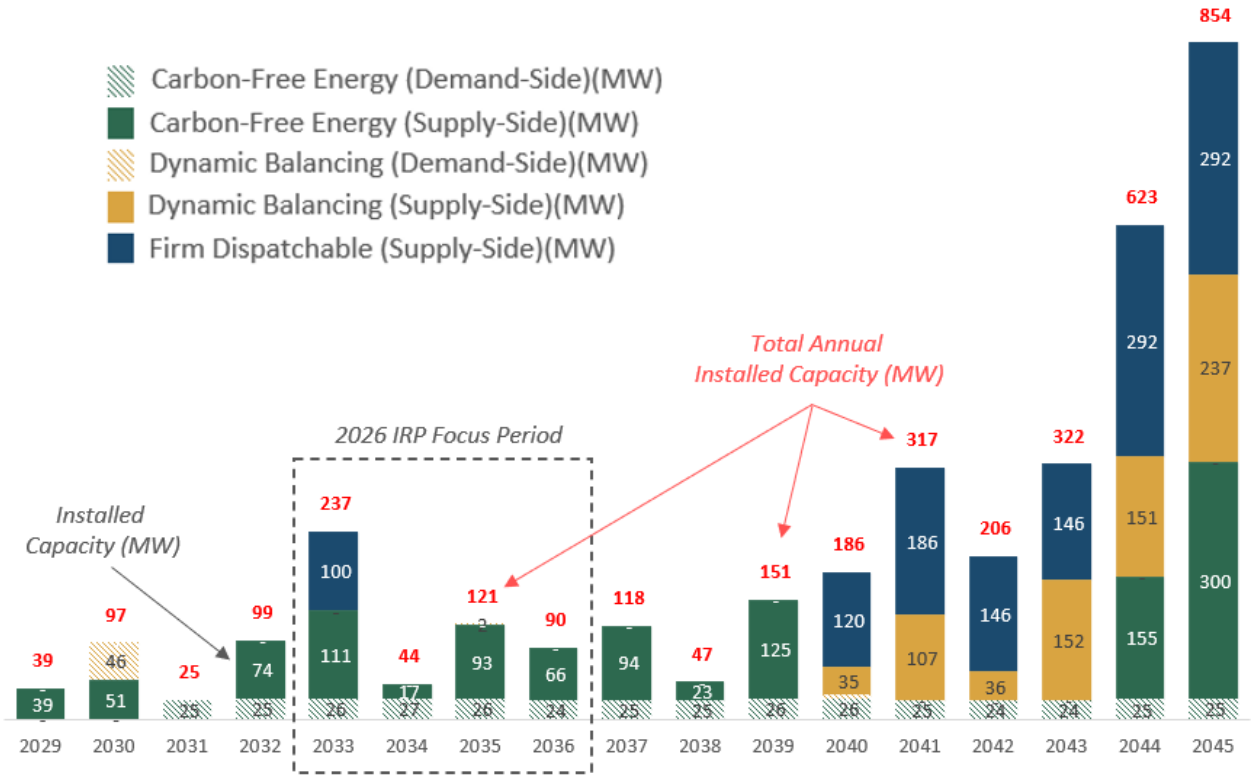
Together, planning processes ensure that generation resources, transmission infrastructure, distribution facilities, and customer-sited technologies are developed in a coordinated manner to reliably and affordably serve customers while supporting state energy policies and economic growth.

Most Cost-Effective Portfolio

PNM identified its Most Cost-Effective Portfolio (MCEP) using the CTP Base Case as the central planning reference for expected resource needs. The expansion plan for the case primarily adds energy efficiency and solar to meet needs prior to 2036. However, because utility planning is affected by uncertainties such as technology development, fuel prices, transmission availability, and load growth, PNM evaluates the MCEP across multiple sensitivity analyses rather than relying on a single fixed portfolio. By identifying common resource needs across different futures, PNM establishes tiered planning ranges that preserve flexibility, support near-term procurement decisions, and reduce the risk of premature commitments to emerging technologies. This broader approach informs the Statement of Need by combining the baseline MCEP with sensitivity-based boundary cases to ensure resource adequacy, maintain planning reserve margins, meet environmental requirements, and pursue least-cost, risk-managed outcomes.

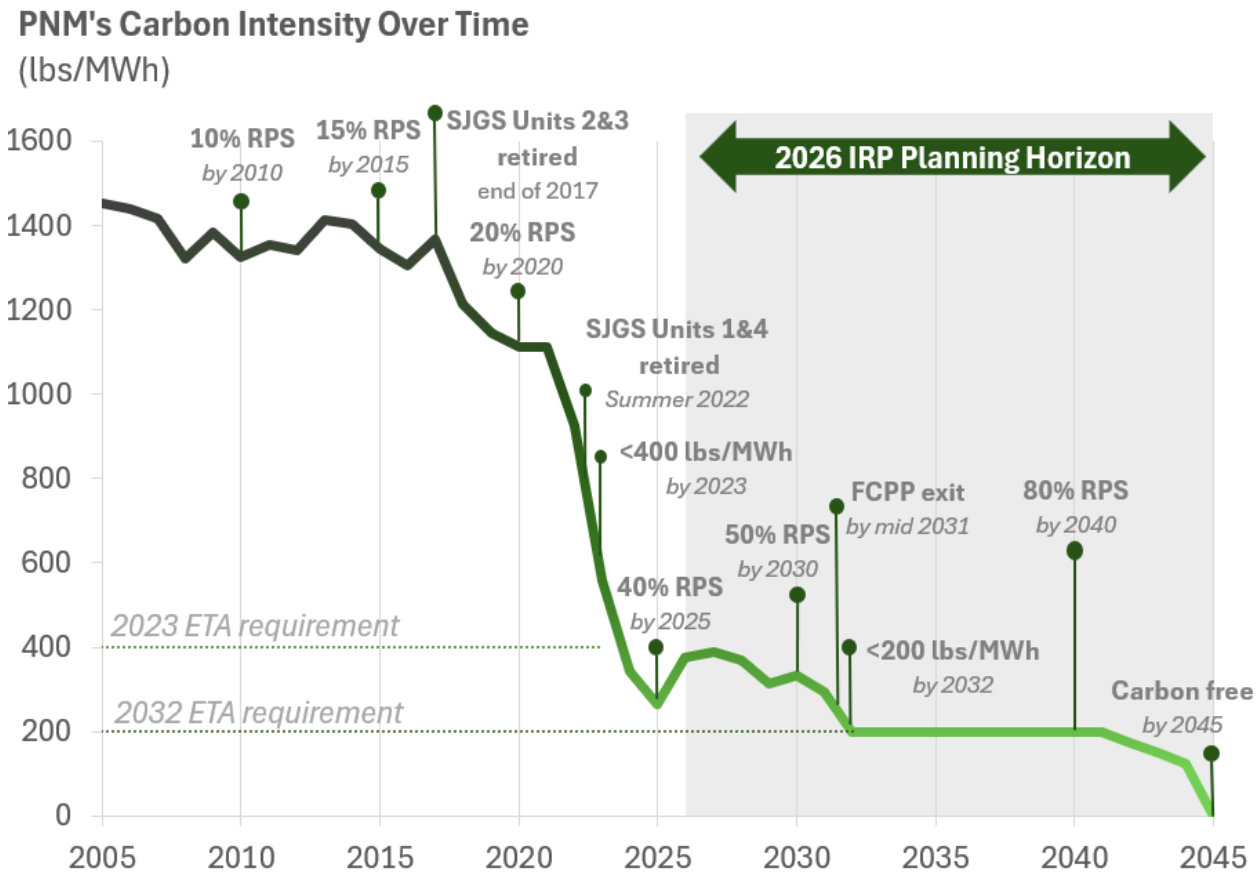
Figure ES-3 outlines the volume, timing, and functional categories of proposed new resources needed to reliably serve customer demand over the 20-year planning horizon while meeting state statutory policy requirements under the CTP base case. Because the MCEP reflects deterministic optimization of a single scenario before sensitivity stress-testing, the formal Statement of Need in Section 10 incorporates both the MCEP baseline and the boundary conditions identified through sensitivity analyses. Expressed through procurement tiers and functional resource attributes, the Statement of Need supports resource adequacy, maintains the PRM, and fulfills state environmental mandates within a least-cost, risk-managed framework.

FIGURE ES-3. INSTALLED RESOURCES OF THE MCEP - CTP FUTURE



The portfolio in the MCEP enables continued carbon reductions and increasing renewable energy supply to comply with the Energy Transition Act (ETA). Figure ES-4 shows the carbon intensity of PNM's MCEP over the 2026 IRP planning horizon.

FIGURE ES-4. CARBON INTENSITY PROGRESSION OVER TIME

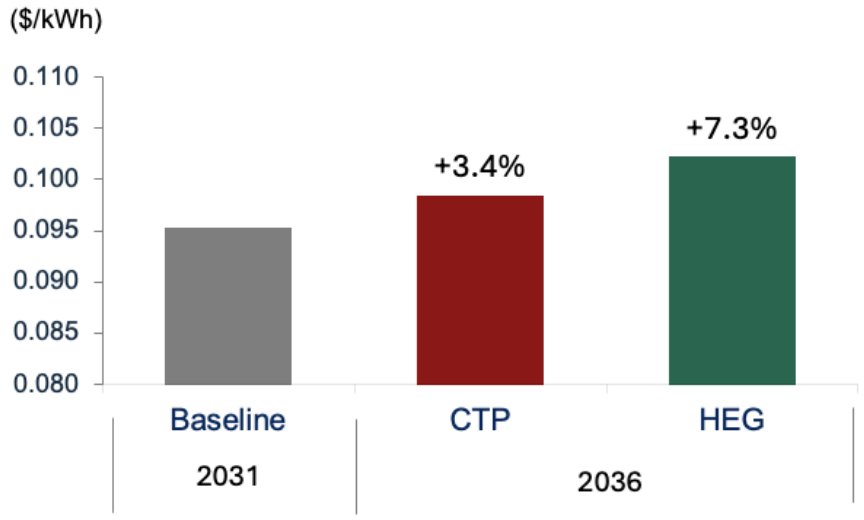


Note: Reported carbon intensity is calculated from modeling results by dividing total emissions from PNM's generation fleet by total annual energy production. Mandated carbon emission intensity compliance is measured over a defined three-year window, the first being 2023-2025. Future compliance outcomes may vary depending on variables such as load, weather, and actual system dispatch.

Affordability and Customer Cost

Beyond the Current Trends and Policies MCEP, PNM's 2026 IRP analysis included an indicative impact on customer rates demonstrating that the energy transition requires a significant amount of investment in the grid, but the resulting impact to customer costs may be tempered with additional growth in the system. Figure ES-5 below demonstrate the customer rate impacts projected across the CTP and HEG load futures. The average system rate ranges from $0.09525/kWh (Baseline) to $0.10220/kWh (HEG), which on an annual percentage basis is lower than the current forecasted rate of inflation. These reflect the incremental costs for generation between 2031 and 2036 but the total impact would be affected by investments in transmission and distribution as well.

FIGURE ES-5. SYSTEM AVERAGE RATE



PNM's customer affordability strategy is a coordinated approach that includes integrated resource planning, fair cost allocation, customer protection for large loads, demand side management resource expansion, regional market participation, strategic transmission investment and potential legislative and/or regulatory tools to reduce long-term customer risk.

Statement of Need

PNM's Statement of Need translates modeling results into a practical planning framework for future procurement, identifying the gap between existing and approved resources and projected customer needs. Future resource needs are driven by load growth, planned retirements, contract expirations, and the need to maintain PNM's 14.5% Planning Reserve Margin. PNM's 2026 IRP analysis evaluates this need across multiple load futures, including Low Economic Growth, Current Trends and Policy, High Economic Growth, and an Extreme Economic Development sensitivity, demonstrating that resource needs vary materially depending on actual load growth and future system conditions. Rather than prescribing a single fixed procurement outcome for each evaluated future, the Statement of Need expands beyond the single scenarios to evaluate how portfolio choices adapt across a broad suite of sensitivity analyses, including stakeholder scenarios, and boundary cases to define a range of plausible resource needs that can guide future solicitations and planning decisions. Table ES-2 below summarizes ranges of resource needs by resource category across planning futures evaluated in this IRP.

TABLE ES-2. STATEMENT OF NEED RANGES ACROSS FUTURES AND SENSITIVITIES THROUGH 2036 (MW NAMEPLATE)

Resource Category	Current Trends and Policy[a]		Low Economic Growth[a]		High Economic Growth[a]		Extreme Economic Growth[a]
	Low[b] (MW)	High[b] (MW)	Low[b] (MW)	High[b] (MW)	Low[b] (MW)	High[b] (MW)	Total (MW)
Carbon-Free Energy	556	794	163	163	1,223	1,398	5,396
Dynamic Balancing	15	45	9	9	46	695	2,373
Firm Dispatchable	0	200	0	0	80	400	1,360

Notes:

a. Need ranges do not include existing, approved resources not yet in-service and pending resources not yet approved.

b. The 'Low' and 'High' columns within each individual load scenario do not represent low or high economic growth; rather, they represent the optimization bounds driven by variations in key modeling assumptions within that specific load track.

PNM's Statement of Need provides flexible, risk-informed framework for aligning future resource procurement with reliability, affordability, and environmental objectives. By defining resource needs in ranges and functional categories, PNM preserves the ability to adjust procurement as load growth, technology availability, market conditions, resource costs, and policy requirements evolve. Details of PNM's Statement of Need are discussed in Section 10.

Creating a Plan for Action

The 2026 IRP Action Plan translates IRP findings and stakeholder feedback into near-term actions that support PNM's long-term goals for reliability, customer value, and decarbonization. The items in the plan cover resource procurement, emergent technologies, transmission expansion, regional markets and demand side and grid modernization activities. The plan focuses on completing procurement and regulatory activities for 2029-2032 resource needs, including the 2029-2032 All-Source Generation Resource RFP Supplement and resources tied to the Four Corners Power Plant abandonment application, while preparing for future system needs.

PNM also plans to develop an All-Source RFP for 2033-2036 resources for supply-side and demand-side options subsequent to acceptance of the 2026 IRP. Since 2029-2032 selections and key planning inputs must be completed first, PNM may seek a variance from the IRP procurement schedule.

The Action Plan further commits PNM to analyzing key transmission alternatives, participating in regional resource adequacy efforts, expanding demand-side and grid modernization programs, and advancing time-of-day rate design following advanced metering infrastructure (AMI) deployment. Additional commitments include annual progress reporting, continued stakeholder engagement, filing a Large Load Tariff to protect customers while supporting economic development, and completing the 2029 IRP in accordance with 17.7.3 NMAC. Details of PNM's 2026 IRP Action Plan are discussed in Section 11.

1. Introduction

PNM's 2026 IRP continues PNM's long-term planning effort to provide customers with reliable and affordable electric service while advancing New Mexico's transition to a carbon-free energy future. This IRP builds on the foundation established in PNM's 2023 IRP and reflects the significant changes that have occurred since that filing, including higher near- and long-term load expectations, continued progress in adding renewable and battery storage resources, evolving federal tax and trade policy, regional market developments, and the growing importance of transmission, resource adequacy, and emerging clean firm technologies.

PNM's 2023 IRP identified a path toward meeting the requirements of the ETA and achieving a carbon-free resource portfolio by 2045. Since that time, PNM has taken substantial steps to implement that plan. PNM has pursued and received approval for new solar and battery storage resources, advanced resource procurement to meet 2026 through 2028 system needs, filed for approval of a 2029-2032 resource portfolio, continued planning for its exit from the FCPP, and expanded programs for demand-side resources, grid modernization, regional markets, and transmission alternatives. These actions demonstrate meaningful progress toward decarbonization while preserving the reliability and flexibility needed to serve customers under changing system conditions. PNM's commitment to decarbonize its generation portfolio aligns with the state of New Mexico's policy to achieve deep reductions to its carbon footprint.

At the same time, the planning environment has changed materially since the 2023 IRP. PNM's load forecast has increased, driven in part by broader electrification trends, economic development opportunities, and large-load interest in New Mexico. Resource development timelines have lengthened because of supply-chain constraints, permitting challenges, inflationary pressures, and increased demand for generation, storage, and transmission equipment. Federal policy has also shifted, affecting the availability and timing of clean energy tax benefits that had been expected to help reduce customer costs. These developments reinforce the need for proactive planning, earlier procurement, and a flexible framework that can adapt as market conditions, customer needs, and technology options continue to evolve.

The 2026 IRP is therefore not limited to identifying a single static MCEP. Instead, it evaluates a broad range of plausible futures, scenarios, and sensitivities to understand the resource needs that may emerge under different combinations of load growth, technology cost, policy, reliability, and market conditions. This planning approach recognizes that the next several years will be critical for positioning PNM's system for the 2030s and beyond. Many resources that may be needed in the mid-2030s require years of advanced development, including generation, storage, transmission, demand-side capabilities, and emerging clean firm technologies. As a result, decisions made during the 2026 IRP Action Plan period will influence PNM's ability to reliably and affordably serve customers well into the future. PNM has made substantial progress on a carbon-free energy portfolio. Since the previous IRP, PNM has added substantial solar and storage resources.

Each IRP provides an opportunity to refine PNM's plans to meet the challenges ahead as the future comes into sharper focus. PNM has reduced the need in the near term for firm generating

resources through extending the operation of the Valencia Energy Facility (VEF) through a new PPA and extending operations of the Reeves. However, a 2031 exit from the FCPP will lead to the loss of 200 MW of firm generating capability. New resources to compensate for an exit from FCPP have been requested in the 2029-2032 resource filing which will help reshape the resource portfolio and move the system toward a higher percentage of carbon-free energy.

While there is great opportunity ahead, there are also significant challenges. Many of the options require years of lead time and preparation to integrate into the portfolio. Permitting and development timelines require years to complete, and more recently have extended beyond historical norms, which means planning must be done today for 2030 system needs. Achieving a reliable, sustainable, and affordable portfolio requires proactive planning and deliberate, sustained action.

A central purpose of this IRP is to identify the types and timing of resources PNM will need to maintain reliability, manage costs, reduce carbon emissions, and comply with applicable regulatory and environmental requirements. PNM's analysis considers commercially available resources such as solar, wind, BESS, energy efficiency (EE), DR, and natural gas, while also evaluating longer-lead and emerging technologies that may become important to achieving a reliable carbon-free portfolio by 2045. These technologies may include long-duration energy storage, advanced or enhanced geothermal, hydrogen-capable resources, advanced nuclear, fusion, and other clean firm options as they become commercially viable.

Stakeholder engagement remains a fundamental part of PNM's IRP process. Consistent with the IRP Rule, PNM conducted a facilitated stakeholder process with the support of the Commission-appointed independent facilitator. Through workshops, office hours, written feedback, and stakeholder-requested modeling, participants provided meaningful input on assumptions, modeling approaches, scenarios, resource technologies, transmission considerations, the Statement of Need, and the Action Plan. PNM appreciates the time and expertise contributed by stakeholders and has incorporated stakeholder perspectives throughout this IRP where appropriate.

This IRP also reflects lessons learned from implementation of the 2023 Action Plan. PNM has advanced procurement activities, evaluated emerging and long-lead technologies, assessed continued use of existing generation sites, expanded analysis of demand-side resources, progressed grid modernization efforts, and continued participation in regional market development. Several of these efforts remain ongoing and are carried forward or refined in the 2026 Action Plan. The 2026 IRP therefore serves both as a progress report on prior planning commitments and as a forward-looking roadmap for the next phase of PNM's resource transition.

Ultimately, the 2026 IRP is intended to provide a transparent and disciplined planning framework for navigating uncertainty. The specific resources that PNM ultimately procures will depend on competitive solicitation results, regulatory approvals, project viability, customer needs, cost trends, technology development, transmission availability, and reliability requirements. The IRP does not predetermine the outcome of future procurement processes; rather, it identifies the resource needs, risks, and decision pathways that should guide those processes. By maintaining flexibility and beginning critical planning activities early, PNM can better manage affordability,

support economic development, maintain reliability, and continue progress toward a carbon-free system.

The sections that follow describe PNM's planning framework, stakeholder process, planning objectives, review of the 2023 IRP, updates since the prior IRP, and modeling enhancements. Together, these elements provide the basis for PNM's long-term resource strategy and the near-term actions needed to continue serving customers reliably and responsibly through a period of significant industry transformation.

1.1 IRP Policy Considerations

PNM has prepared this IRP in accordance with 17.7.3 NMAC, Integrated Resource Plans for Electric Utilities (IRP Rule). The IRP Rule was originally issued by the NMPRC on March 1, 2007, and has been amended on four occasions, most recently on October 27, 2022. As established by the IRP Rule, the purpose of the IRP is to identify the MCEP resources to meet the future needs of customers:

IRP Rule

> The objective of this rule is to set forth the commission's requirements for the preparation, filing, review, and acceptance of integrated resource plans by public utilities supplying electric service in New Mexico to identify the most cost-effective portfolio of resources to supply the energy needs of customers.
>
> – 17.7.3.6(A) NMAC

The IRP Rule further requires that New Mexico electric public utilities file an IRP every three years that includes the following information (17.7.3.8 NMAC):

- A description of existing electric supply-side and demand-side resources (Section 3, Section 4);
- A current load forecast (Section 3);
- A load and resources table (Section 6);
- New load and facilities arising from special service agreements, economic development projects, and affiliate transactions (Appendix H);
- Identification of resource options (Section 8);
- A determination of resource portfolios (Section 9);
- A Statement of Need (Section 10);
- An Action Plan (Section 11)

For additional information regarding these requirements, please refer to Appendix G, Rules & Regulatory.

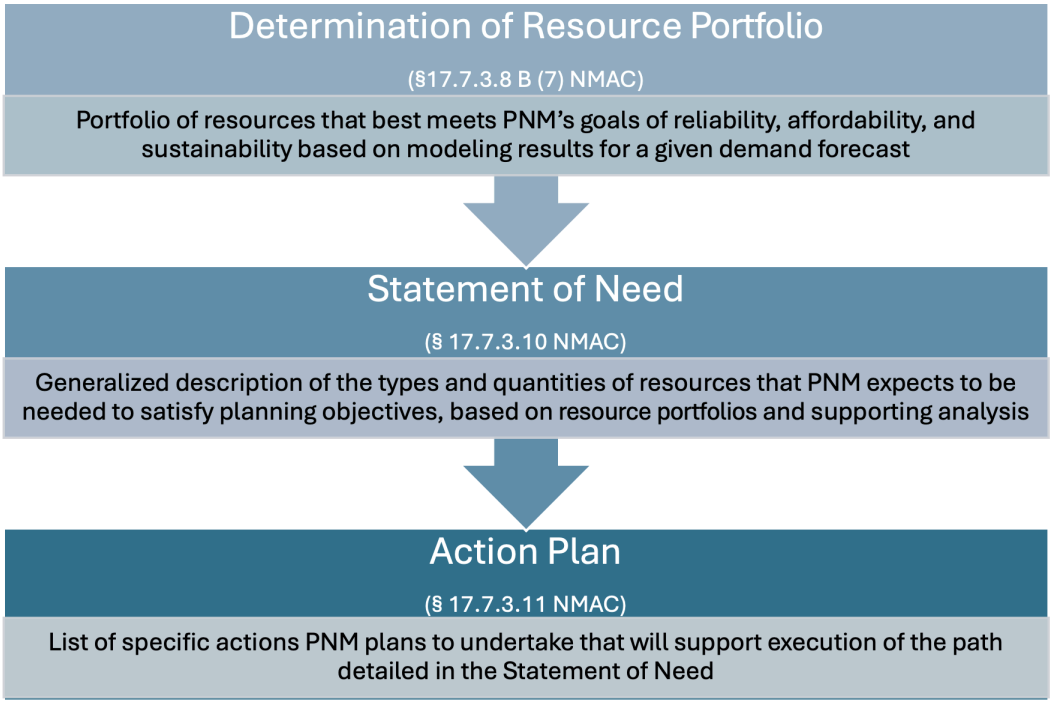
As stated in 17.7.3.10 NMAC, the Statement of Need requires this IRP to clearly articulate what types and quantities of resources will be needed to meet future resource needs:

A. The statement of need is a description and explanation of the amount and the types of new resources, including the technical characteristics of any proposed new resources, to be procured, expressed in terms of energy or capacity, necessary to reliably meet an identified level of electricity demand in the planning horizon and to effect state policies.

B. The statement of need shall not solely be based on projections of peak load. The need may be attributed to, but not limited by, incremental load growth, renewable energy customer programs, or replacement of existing resources, and may be defined in terms of meeting net capacity, providing reliability reserves, securing flexible resources, securing demand-side resources, securing renewable energy, expanding or modifying transmission or distribution grids, or securing energy storage as required to comply with resource requirements established by statute or commission decisions.

The IRP Rule requires this IRP to identify a resource portfolio (i.e., MCEP) as part of its stated objective. The determination of the resource portfolio designed to represent MCEP serves as an important step in creating the Statement of Need and Action Plan. Figure 1-1 illustrates the relationship between the Most Cost-Effective Portfolio, the Statement of Need, and the Action Plan. However, recognizing that a single portfolio is incapable of adapting to future needs, industry changes and reducing unnecessary risks in a rapidly evolving landscape does not support prudent planning principles. To address this, PNM establishes a tiered planning approach to the MCEP that accounts for load forecast uncertainty and incorporates flexibility for procurement driven variables.

FIGURE 1-1. RELATIONSHIP BETWEEN THE MOST COST-EFFECTIVE PORTFOLIO, STATEMENT OF NEED, AND ACTION PLAN



The IRP Rule establishes a facilitated stakeholder process led by an NMPRC appointee. The facilitated stakeholder process established by the rule enhances the transparency of this planning process and allows third-party stakeholders to have direct input into this IRP. Through this process, PNM's Statement of Need and Action Plan are created with consultation and input from stakeholders and NMPRC staff. PNM's stakeholders are further empowered by the ability to access, under confidentiality, the IRP modeling data used in this IRP, enabling the ability to perform their own independent analysis.

The facilitated stakeholder process continues after PNM files its IRP. The existing process by which stakeholders comment on the filing will become more interactive, as PNM replies to all stakeholders having either adopted their proposed changes or provided a rationale for not doing so.

1.1.1 IRP PLANNING PROCESS

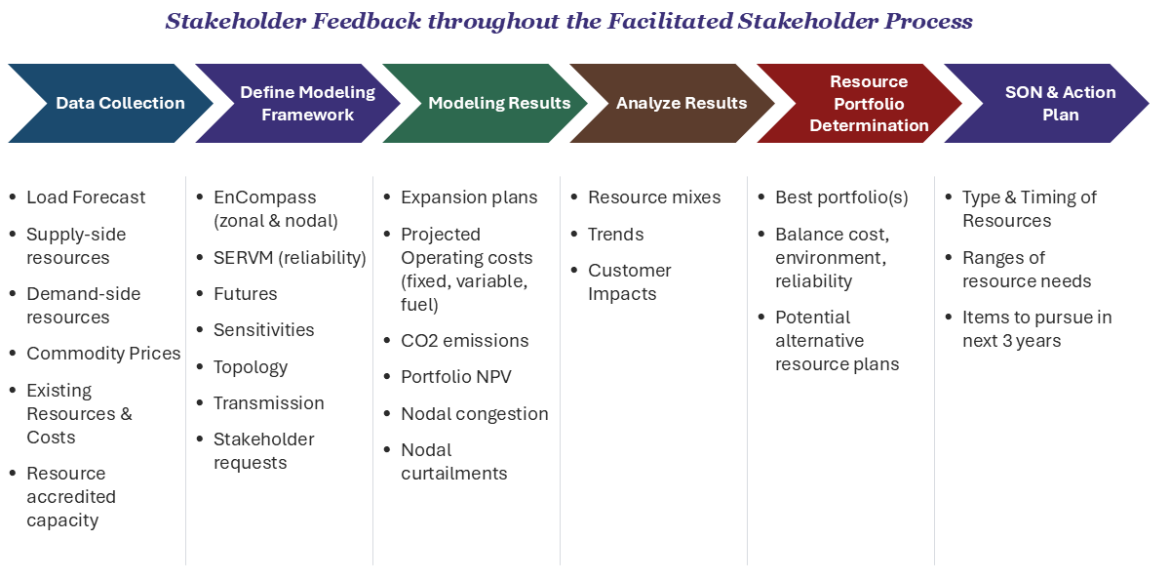
The IRP planning process identifies the mix of resources that, together, reliably meets system operational requirements, adheres to regulatory requirements, and mitigates environmental impacts, all while minimizing costs to customers. This planning process ensures PNM can respond to projected future events and ensure adequate resources are available to meet a variety of expected system conditions, customer demands, and maintain service reliability. The IRP is reevaluated every three years, with earlier notifications to the NMPRC and stakeholders if material changes in assumptions would lead to a revised course of action.

The 2026 IRP planning process horizon spans a 20-year period; for this IRP, the horizon considered spans between 2026 through 2045. By evaluating PNM's IRP portfolios that incorporate milestone requirements set forth in the ETA through the complete transition of its goal, PNM strives to demonstrate that the actions undertaken herein are not only in the best interests of customers today but will enable its complete transition to a carbon-free portfolio by 2045.

The IRP process is forward-looking, and therefore subject to uncertainty; wherever possible, PNM mitigates this uncertainty by relying on known and reasonably expected variables to develop assumptions. These include assumptions about technology availability and price, current regulations, anticipated future regulations, and consumer usage patterns.

PNM engages in a comprehensive and collaborative process for its IRP analyses to identify the MCEP, develop the Statement of Need, and establish the Action Plan. The process included reviewing existing resources, forecasting future energy needs, examining future resource options, designing scenarios, and sensitivity analyses to evaluate various resource portfolios, which are all summarized in Figure 1-2. Throughout the process, the PNM Integrated Resource Planning team worked to solicit and incorporate input from participants in the facilitated stakeholder processes. Details regarding the facilitated stakeholder process are described in Section 1.2.

FIGURE 1-2. SUMMARY OF IRP PLANNING PROCESS



Connection with Transmission Planning Processes

PNM's IRP and its Transmission Planning process are distinct but interdependent functions, each with a different regulatory scope, modeling approach, and planning horizon. Transmission planning accounts for both retail and wholesale network customers under PNM's Open Access Transmission Tariff (OATT) and is governed by North American Electric Reliability Corporation's (NERC) mandatory TPL-001 Reliability Standards, using a ten-year planning horizon updated annually and relying on granular power flow and electromagnetic transient models. The IRP, by

contrast, is limited by rule to serving New Mexico jurisdictional retail customers, spans a twenty-year horizon on a three-year cycle, and relies on capacity expansion modeling to identify the least-cost resource portfolios. While the IRP does not independently determine specific transmission lines or elements needed to serve the system, it incorporates the expected costs of transmission upgrades associated with new generation additions, using information provided by PNM's Transmission Planning team.

Despite these differences, the two processes function as a continuous, mutually reinforcing feedback loop rather than sequential or independent activities. Transmission Planning provides the IRP with critical deliverability constraints, generator interconnection costs and timing, and reliability need dates that shape which resources can be feasibly selected and when they can be placed in service; in turn, the IRP's preferred resource portfolios and public policy assumptions become key inputs to subsequent transmission planning and regional transmission plans. PNM has reinforced this coordination organizationally by combining its formerly separate IRP and Transmission Planning teams into a single Integrated System Planning process, reflecting an industry-wide shift toward more tightly coordinated resource and transmission planning as the pace and scale of the energy transition accelerates.

This shift toward integrated system planning reflects a broader industry recognition that a utility's generation, transmission, distribution, and customer-program investments are most effectively planned together rather than in isolation. For PNM, adopting this approach means that transmission analysis can be incorporated more directly into future IRP cycles, better aligning near-term operational realities with long-term resource decisions. PNM continues to seek out additional opportunities to strengthen this integration across its planning processes.

Key Term

Integrated System Planning (ISP) refers to a coordinated process in which a utility develops a single long-term plan that links together the different elements of its system – which may include generation, transmission, distribution, and customer programs.

1.2 Public Stakeholder Process

Active and broad stakeholder participation is a crucial element of a successful planning process that serves the public interest of New Mexico, and the diversity of perspectives offered by PNM's stakeholders directly enhances the quality of the IRP. The IRP Rule also places heightened emphasis on transparency and the importance of robust stakeholder participation, specifying that the utility must engage in a facilitated stakeholder process led by a Commission-appointed independent facilitator.

In late 2025, following Commission approval PNM initiated the 2026 Facilitated Stakeholder Process early to allow for an extended period of time, well beyond the minimum timeframe required by the Rule, to share information and solicit public feedback across a broad range of planning topics. The Commission appointed Gridworks to lead and facilitate this process. Through December 2025 and August 2026, PNM hosted nine open workshops covering IRP modeling,

methodologies, and analytical results, alongside multiple office hours and Q&A sessions open to all stakeholders.

In accordance with the transparency mandates of the IRP Rule, all stakeholder modeling requests and discussions have been incorporated into this report and can be found in Section 9. A complete schedule of stakeholder workshops and office hours is provided in Table 1-1 and a comprehensive summary of all workshop proceedings and discussions across all stakeholder meetings can be found in Appendix C. Feedback from the 2023 IRP that was incorporated into the 2026 IRP, frequent topics that were a part of the 2026 IRP facilitated stakeholder process as well as how PNM addressed stakeholder comments regarding the Statement of Need and Action Plan can be found in Appendix D.

TABLE 1-1. PNM'S 2026 IRP FACILITATED STAKEHOLDER PROCESS MEETINGS

Meeting	Date	Topic
Workshop 1	Dec. 9, 2025	Utility Vision and Stakeholder Interests
Workshop 2	Jan. 14, 2026	PNM System, Challenges and Opportunities
Office Hour 1	Jan. 27, 2026	2023 IRP: Three Studies
Workshop 3	Feb. 11, 2026	Modeling Foundation
Office Hour 2	Feb. 18, 2026	Transmission Modeling
Office Hour 3	Mar. 4, 2026	Geothermal Costs
Office Hour 4	Mar. 5, 2026	Follow Up to Workshop 2 and 3
Workshop 4	Mar 11, 2026	Modeling Update and Stakeholder Run Ideas
Office Hour 5	Mar. 25, 2026	Follow up to Workshop 4
Workshop 5	Apr. 15, 2026	Base Case Results and Refining Stakeholder Requested Model Runs
Office Hour 6	Apr. 20, 2026	PNM Transmission Modeling
Workshop 6	May 13, 2026	Model Results and Implications
Office Hour 7	Jun. 10, 2026	Remaining Stakeholder Modeling Results
Workshop 7	Jun. 17, 2026	Utility Decisions, Statement of Need, Action Plan
Workshop 8	Jul. 15, 2026	Complete Statement of Need and Action Plan
Workshop 9	Aug. 12, 2026	Review Key IRP Elements

Over the course of this nine-month process, stakeholders contributed to the development of the IRP in many meaningful ways. Notably, stakeholders:

- Contributed a broad range of recommendations for scenarios and sensitivities to study;

- Brainstormed topics and presented language for inclusion in PNM's Statement of Need for joint discussion;
- Offered actionable suggestions for shaping PNM's Action Plan; and
- Provided perspectives that challenged conventional thinking and ultimately led to a more resilient final product.

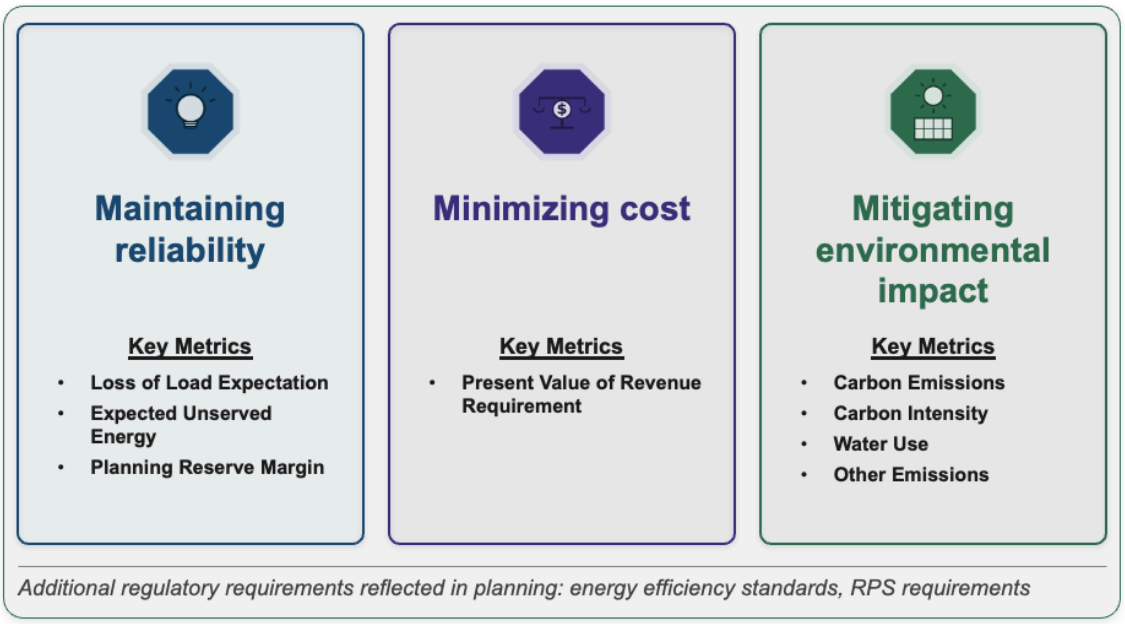
Throughout this document, PNM highlights the most prominent and direct stakeholder contributions that helped shape the IRP. Additionally, stakeholders provided valuable feedback on areas to improve the process for future IRP cycles.

PNM deeply values the many hours that stakeholders dedicated to this effort. Going forward, continued stakeholder engagement will remain essential to shaping the future of PNM's resource portfolio, and PNM invites any interested parties wishing to contribute to future planning steps to notify PNM of their interest.

1.3 Planning Objectives

Consistent with the objectives used in the past to develop the IRPs, this IRP aims to identify the types and timing of resources that meet customer electricity supply needs reliably, with limited environmental impact, and at the lowest reasonable cost. A secondary objective of this IRP is to study and outline the challenges and uncertainties PNM expects to confront as its portfolio changes and progresses to the mandated 2045 carbon-free goal.

FIGURE 1-3. CORE OBJECTIVES CONSIDERED IN PNM'S LONG-TERM PLANNING PROCESS



Reliability

Reliable electric service for PNM's customers is of paramount importance. PNM's customers expect and rely on stable, reliable electric service for their homes and businesses, and fulfilling this obligation is a matter of public welfare and safety.

PNM prioritizes reliability as a required condition for all portfolios in the IRP planning process; this objective is consistent with the standards for electric service set forth in 17.9.560.13(C) NMAC:

IRP Rule

> The generating capacity of the utility's plant supplemented by the electric power regularly available from other sources must be sufficiently large so as to meet all normal demands for service and provide a reasonable reserve for emergencies.
>
> – 17.9.560.13(C) NMAC

Reliability planning informs both the amount of resources needed in PNM's portfolio and how those resources are operated. PNM evaluates resource adequacy using an industry-standard LOLE target of 0.1 days per year, supplemented by Expected Unserved Energy (EUE) to capture the frequency, duration, and magnitude of potential reliability risks. PNM also models portfolio operations on an hourly basis to ensure operating reserves are maintained, consistent with NERC reliability standards.

This IRP further incorporates extreme-weather stress tests to evaluate portfolio resilience as renewable and storage penetration increases.

Affordability

Customer affordability is a central consideration in PNM's IRP as rapid load growth, infrastructure needs, the transition from higher carbon-emitting resources, supply-chain constraints, and changing federal tax incentives place upward pressure on costs. PNM evaluates resource and transmission decisions based not only on near-term capital costs, but also on long-term costs, reliability, environmental performance, timing, risk, and potential rate impacts. This approach emphasizes assigning incremental costs consistent with cost causation, particularly when new large loads create additional system requirements, while pursuing least-regrets transmission, resource diversification, regional market participation, and grid-enhancing technologies that may reduce long-term costs and reliability risks.

Recognizing that today's least-cost pathway may change as technologies, costs, risks, and market conditions evolve, PNM emphasizes portfolio flexibility and common resource needs, attributes, and timing rather than premature commitments to specific technologies. This approach supports future re-optimization as conditions become clearer and emerging technologies mature. Additionally, customer rate impact analysis complements this flexibility by translating resource portfolios into illustrative revenue requirements and average system rate impacts. Although it does not pre-approve costs or substitute for future regulatory review, rate analysis provides a planning-level indication of potential customer impacts, highlights opportunities for PNM to mitigate those impacts, and supports the evaluation of affordability considerations in resource planning.

Environmental Impact

The third planning objective is to mitigate environmental impacts. PNM recognizes climate change as a critical issue and is committed to protecting the local environment, conserving natural resources, and reducing greenhouse gas emissions associated with fossil-based generation. To support state policy objectives established under the New Mexico ETA, PNM's resource plan is structured to achieve mandatory RPS milestones, including 40% renewable energy by 2025 and 50% by 2030, culminating in a 100% carbon-free electricity supply by 2045. By transitioning away from fossil-fueled generation and accelerating clean energy procurement, PNM continues to drive down portfolio carbon intensity, supporting a cleaner, more sustainable energy future for New Mexico communities while maintaining grid reliability. In response to stakeholder priorities, PNM has taken meaningful action over the past two decades to support a cleaner, more secure, and sustainable energy future.

1.4 Review of 2023 IRP

The 2023 IRP continued PNM's progress along its pathway toward meeting the New Mexico ETA carbon-free goal by 2045. This section provides an overview of the 2023 IRP outcomes and details the progress made on each element of its associated Action Plan.

Key Findings

PNM's most recent IRP was filed with the NMPRC in December 2023 and outlined the company's resource plan through 2042. The IRP was accepted by the NMPRC in April 2024. Approximately one month later, PNM filed a notice of material event based on updated demand and energy forecasts that indicated a material increase in expected load growth. In response, PNM submitted the 2023 IRP supplement analysis in October 2024, updating the assumptions and findings of the December 2023 IRP. The supplement analysis ultimately resulted in a revised statement of need.

Three years later, PNM remains firmly committed to its long-term goal to transition to a fully carbon-free system and has achieved a significant reduction in its carbon intensity and is currently operating below 400 lbs/MWh on a portfolio basis. In the intervening years, PNM has continued to transition its portfolio with the energization of its approved 2026 Resource Portfolio, which includes 410 MW of new installed resources and storage, including 310 MW of new 4-hour BESS, and 100 MW of new solar resources.

Additionally, PNM and its partners are progressing on the development of 617 MW of resources and storage approved in the 2028 Resource Filing, including 350 MW of new 4-hour BESS, and 100 MW of new solar, along with continuation of the 167 MW VEF and the 290 MW of solar resources and 268 MW of four-hour (4hr) BESS for PNM's Special Service Contract customer as 36B resources. In total, since the 2023 IRP, PNM has added or obtained approval for 1,585 MW of installed resources and storage.

PNM also filed for approval of its 2029-2032 Resource Portfolio to replace PNM's 200 MW interest in FCPP, serve new load demand, diversify the portfolio, and lower the portfolio's carbon intensity by another 50% by 2032, to 200 lbs/MWh. That portfolio includes 800 MW of new wind resource, 240 MW of new solar, 610 MW of new 4- and 8-hour BESS, and 40 MW of new natural gas

resource (depreciated by 2044). That portfolio allows PNM to continue to meet its 0.1 LOLE standard and is currently pending NMPRC consideration.

PNM has continued to build operating experience with renewable and short-duration storage technologies and identified plans to exit its interest in the FCPP, the last remaining coal plant and most carbon-intensive resource currently in the portfolio. While the IRA provided federal tax benefits that supported many of PNM's resource developments in these intervening years, the tax-advantaged pricing going forward is set to phase out because of the OBBBA.

Beyond the resource additions described above, PNM also completed a 20-year Transmission Outlook to evaluate a variety of potential conceptual transmission line expansions that provide potential benefit to the system. This evaluation helped identify four transmission options that PNM evaluated in this 2026 IRP. It is a valuable resource that identifies opportunities to increase market access and support dynamic resource sharing with neighboring entities that becomes continually important to reliability, resilience, and affordability on the path to carbon free.

1.4.1 2023 IRP Four-Year Action Plan

The 2023 IRP concluded with an Action Plan that identified strategic activities designed to help PNM continue to reliably meet customer needs and expectations at a reasonable cost while making steady progress toward a carbon-free portfolio. PNM has made significant progress toward completing the elements of the 2023 Action Plan. Those action plan elements not fully resolved between the 2023 and the 2026 IRPs remain ongoing and are explored within this plan. The status of the elements since the 2nd Action Plan update filed with the Commission is discussed briefly below and summarized in Table 1-2.

Table 1-2. Status of 2023 IRP Action Plan Items

Action Plan Item #	Action Plan Elements	Status
1	Issue an all-source RFP for resources coming online between 2029 and 2032	Completed / In Progress
2	Issue an RFI/RFP for long lead time resources or newer technologies that could deliver between 2029 and 2035	Revised / Completed
3	Evaluated opportunities to abandon FCPP earlier than 2031 as available and in the interest of customers. Notice to the Commission of PNM decision against an early exit was filed on April 23, 2024.	Completed / Concluded
4	Evaluate the ability to create new (or improve existing) demand response and other customer programs (e.g. customer sited storage, interruptible rates)	Completed
5	Assess the ability to add capacity at PNM's existing plant sites	Completed

Action Plan Item #	Action Plan Elements	Status
6	Continue to explore the expanded participation in regional market	Ongoing
7	Assess the need to utilize other reliability metrics in planning	Ongoing
8	Initiate stakeholder workshops and meetings for the 2026 IRP in advance of the required six months stakeholder process as required under the IRP Rule	Completed
9	Complete the 2026 IRP	Completed

Detailed Progress by Action Plan Element

Since the filing of the second Action Plan Update in Docket No. 23-00409-UT, PNM has progressed each action item through concrete operational, procurement, and regulatory actions. Detailed status updates for each of the 2023 Action Plan elements are provided below:

2029-2032 All-Source RFP: PNM issued an all-source RFP for resource additions in the 2029-2032 timeframe on December 30, 2024. RFP bids were received by May 14, 2025. PNM completed Phase 1, Phase 2, and Phase 3 bid evaluations and determined a preferred portfolio of resources to be added during that window. PNM filed the 2029–2032 Resource Plan with the NMPRC on May 29, 2026. Additionally, PNM issued the 2029–2032 All-Source Generation Resources RFP Supplement on May 1, 2026.

Issue RFI/RFP for long lead time resources: PNM completed its evaluation of data on emerging and long lead time resource technologies through collaboration with the Electric Power Research Institute (EPRI). Updated technology assumptions and resource characteristics derived from this research were fully incorporated into the 2026 IRP analysis to evaluate a comprehensive range of future resource options.

FCPP Exit: PNM completed its evaluation of an exit from FCPP and documented the results in the 2024 Action Plan Update. The replacement resources for the 2031 exit from FCPP were evaluated and included as part of the 2029-2032 resource plan filing along with an abandonment filing to exit FCPP.

Evaluate ability to create new DSM/Customer programs: In the fall of 2025, PNM contracted with ICF to conduct a Residential Appliance Saturation Survey, an EE and DR Potential Study.[1] Through these studies, PNM and ICF evaluated a broad range of demand-side resources to

[1] "Public Service Company of New Mexico Potential Study 2026-2045." ICF. October 2025. Available at https://www.pnm.com/documents/d/pnm.com/pnm-2025-potential-study-report-1-pdf

identify viable opportunities for meeting future customer needs. The resulting potential estimates and program assumptions were fully incorporated into the 2026 IRP analysis.

Expand Capacity at PNM's existing plant sites: PNM assessed opportunities to utilize and expand capacity at existing generation sites, resulting in three notable outcomes (each addressed in more detail in Section 1.5.5, 4.1.3, and 1.5.2):

1. *Valencia Energy Facility*: NMPRC approved a PPA extension adding approximately 15 MW of additional capacity while allowing the existing capacity to remain available at this site for an additional 11 years (through 2039).
2. *Reeves*: PNM evaluated extending the potential operating life and intends to continue operation of Reeves Generating Station through the end of 2044 (previously planned to retire at the end of its depreciable life in 2030).
3. *Solar Paired Battery Storage*: The NMPRC approved five 6 MW / 24 MWh (4-hour) distribution-connected battery storage projects located at existing PNM-owned solar facilities

Evaluate expanded participation in regional markets: PNM continued evaluating regional market opportunities to optimize system operations and enhance grid efficiency. On July 1, 2025, PNM signed an implementation agreement to join EDAM with a target go-live date of October 2027. Additionally, PNM also announced its intention to withdraw from the Western Resource Adequacy Program (WRAP) effective November 2027 while continuing participation through the transition period.

Assess reliability metrics: PNM continued evaluating the use of enhanced reliability and resource adequacy metrics in its long-term planning. As part of this effort, PNM participated in the Southwest Resource Adequacy Study, which examined reliability, grid resilience, and resource adequacy challenges under a wide range of future conditions and extreme weather scenarios. For additional information regarding this study, please refer to Appendix L, Southwest Resource Adequacy Assessment.

Implement stakeholder process early: PNM initiated the 2026 IRP stakeholder process well ahead of the required six-month timeline mandated under the IRP Rule. On July 9, 2025, PNM requested a variance from the Commission to initiate the stakeholder process early to allow for a nine-month facilitated process. Following Commission approval, the facilitated stakeholder process began in December 2025, providing approximately nine months of robust stakeholder engagement prior to the September 2026 IRP filing.

1.5 Updates since the 2023 IRP

The years since filing the 2023 IRP have seen significant operational, market, and regulatory developments. This section provides contextual updates on key developments occurring outside the specific scope of the 2023 Action Plan.

1.5.1 Reeves Generating Station Retirement

PNM evaluated whether Reeves should continue operating beyond the end of its depreciable life in 2030. To support this evaluation, PNM engaged an external consultant, Black & Veatch, to estimate the capital investments and ongoing maintenance expenditures required to support continued operation of the facility through 2044.

Portfolio comparisons demonstrated that extending the operating life of Reeves reduced the NPV of system costs by approximately $50 million relative to PNM's preferred portfolio of replacement resources in PNM's 2029-2032 Resource Application.

Additionally, Reeves continues to play a critical role in supporting transmission reliability on PNM's system, particularly in the Albuquerque load pocket. During periods of high system demand and under specific transmission outage conditions, the facility provides local voltage support and helps mitigate transmission constraints.

The Reeves extension was consistently selected as the lower-cost option across all portfolios evaluated, with the greatest value observed in scenarios that included the large load additions considered in the 2029-2032 Resource Application. As a result, the Reeves extension was considered as part of the existing portfolio and would continue providing support through the end of 2044 for the 2026 IRP.

1.5.2 Distribution Battery Filing/30 MW BESS

Since filing the 2023 IRP, PNM advanced deployment of distribution-connected battery energy storage resources to address hosting-capacity constraints and support increasing levels of distributed energy resources on its system. On April 9, 2026, the NMPRC approved PNM's application to construct, own, and operate 30 MW of BESS consisting of five 6-MW, 4-Hour battery installations located at existing PNM-owned solar facilities.

The fleet of distribution sited storage is designed to increase distribution-system hosting capacity, support additional distributed generation and community solar interconnections, improve voltage support and power quality, defer traditional distribution upgrades, and enhance overall system reliability. The BESS are expected to be operational by mid-2027 and will provide additional operational flexibility by storing excess solar generation and discharging energy during periods of higher demand.

1.5.3 Grid Modernization Updates

In 2020, the Legislature adopted Section 62-8-13 (Grid Modernization Statute) of the New Mexico Public Utility Act to encourage grid modernization projects that benefit utility customers and the State of New Mexico. On October 3, 2022, PNM filed an application pursuant to the Grid Modernization Statute for approval of a six-year plan to implement grid modernization components, including AMI, to modernize its electric distribution grid in Docket No. 22-00058-UT. On October 17, 2024, the Commission issued its Final Order approving PNM's application as modified by Recommended Decision and Final Order.

PNM's Grid Modernization Plan has progressed from foundational planning and procurement activities in 2025 to full-scale deployment of grid modernization technologies in 2026, with increasing operational integration expected in 2027.

The most significant milestone is the commencement of large-scale AMI installation, including execution of contracts for AMI vendors and system integrators, deployment of AMI network access points, implementation of AMI head-end and Meter Data Management System environments, and initiation of integration efforts with the Customer Information System, which is expected to continue through 2028.

PNM is also deploying telecommunications infrastructure, cybersecurity enhancements, and distribution automation equipment across its service territory. During the initial phases of the Grid Modernization Plan, PNM advanced upgrades to its telecommunications network, including modernization of legacy communication systems and improvements to its wide area network infrastructure. PNM also procured and began deploying cybersecurity technologies and network monitoring tools to enhance visibility, strengthen system security, and support the increasing digitalization of grid operations. In addition, distribution automation deployments are moving forward in the field, providing the communications and operational capabilities needed to support more automated and responsive operation of the distribution system.

Customer-facing initiatives, including the Customer Energy Management Platform and mobile application, are advancing toward broader implementation, enabling customers to access and manage energy-use information. PNM executed vendor contracts and continued development of these customer-facing systems, while also deploying Customer Identity and Access Management capabilities and initiating data integration and data warehouse activities. PNM intends to make these tools available ahead of full AMI deployment so customers can become familiar with the platform and begin engaging with their energy information. As AMI data becomes available, these systems are expected to provide enhanced usage insights, support future energy efficiency and demand response offerings, and improve the overall customer experience by giving customers greater visibility into their electricity consumption.

Additionally, PNM has initiated vendor selection and system design activities for the Advanced Distribution Management System (ADMS), a key platform that will support future distribution system operations and integration of advanced grid capabilities. ADMS represents one of the most significant technology investments within the Grid Modernization Plan and is intended to provide enhanced operational awareness and control of the distribution network. During 2026, PNM is focused on selecting a vendor, completing system design activities, and establishing the framework for implementation. The first release of the ADMS is expected to be completed in 2027 and will be deployed alongside investments in AMI, telecommunications, cybersecurity, and distribution automation. Once implemented, ADMS will enable greater coordination of grid operations and provide the foundation for future advanced applications that support a more intelligent, reliable, and resilient electric system.

1.5.4 2026 Resource Application

On October 25, 2023, PNM filed an application (Docket No. 23-00353-UT) with the NMPRC seeking approval of a portfolio of solar and battery storage resources needed to meet expected

system reliability and resource adequacy requirements beginning in 2026. PNM demonstrated that without these resources, its reserve margin would fall below acceptable levels and its LOLE would increase significantly, requiring greater reliance on market purchases and potentially affecting reliability.

The NMPRC issued a Final Order on May 30, 2024, approving the requested purchased power agreement (PPA), three energy storage agreements (ESA), and a certificate of public convenience and necessity (CCN) which are listed in Table 1-3.

TABLE 1-3. RESOURCES PROCURED IN THE 2026 RESOURCE APPLICATION

Project	Commercial Structure	Resource Type	Capacity (MW)	Storage Volume (MWh)	Expected Commercial Operation Date
Quail Ranch	PPA	Solar	100	-	12/19/2025
	ESA	Storage	100	400	1/30/2026
Route 66	ESA	Storage	50	200	11/26/2025
Sky Ranch	ESA	Storage	100	400	4/12/2024
Sandia	CCN	Storage	60	240	6/24/2026

1.5.5 2028 RESOURCE APPLICATION

In 2024, PNM initiated the 2028 Resource RFP to acquire new resources needed to maintain system reliability, meet forecasted load growth, and support the transition to a cleaner generation portfolio. The procurement was designed to identify cost-effective resources that could be brought online by 2028 while supporting regulatory requirements and long-term planning objectives. PNM filed the 2028 Resource Application with the NMPRC on November 22, 2024 (Docket No. 24-00271-UT) and received approval on June 26, 2025.

The 2028 Resource Application resulted in the selection of five projects: one PPA, two ESAs, and two CCNs.

TABLE 1-4. RESOURCES PROCURED IN THE 2028 RESOURCE APPLICATION

Project	Commercial Structure	Resource Type	Capacity (MW)	Storage Volume (MWh)	Expected Commercial Operation Date
Sunbelt	CCN	Solar	100	-	5/1/2027
	CCN	Storage	50	200	5/1/2027
Corazon	ESA	Storage	150	600	12/31/2027
Sun Lasso	ESA	Storage	150	600	1/15/2028

Project	Commercial Structure	Resource Type	Capacity (MW)	Storage Volume (MWh)	Expected Commercial Operation Date
VEF Extension	PPA	Natural Gas	167	-	6/1/2028

1.5.6 2028 Rate 36B Resource Application

In 2025, PNM identified the need for additional renewable generation and energy storage resources to support anticipated load growth associated with the Rate 36B customer in New Mexico. Under the amended Special Service Contract, PNM is required to provide sufficient renewable energy to serve this load while ensuring that existing customers are not adversely impacted. PNM filed an application with the NMPRC on June 13, 2025 (Docket No. 25-00048-UT), and received approval on December 18, 2025, resulting in the following six projects pursuant to 17.9.551 NMAC, an Amended Rate No. 36B, Amended Rider No. 47 and Amended Rider No. 49.

Appendix H identifies the new load and associated facilities included in the forecast that arise from special service agreements and economic development projects. Where customer-specific information is confidential, Appendix H presents the information on an aggregated basis.

Table 1-5. Dedicated Rate 36B Customer Resources

Project	Commercial Structure	Resource Type	Capacity (MW)	Storage Volume (MWh)	Expected Commercial Operation Date
Four Mile	PPA	Solar	100	-	12/31/2027
	ESA	Storage	100	200	12/31/2027
Windy Lane	PPA	Solar	90	-	12/1/2026
	ESA	Storage	68	272	12/1/2026
Star Light	PPA	Solar	100	-	12/1/2026
	ESA	Storage	100	400	12/1/2026

1.5.7 2029-2032 Resource Application

PNM's 2023 IRP included an Action Plan item to issue an all-source RFP to identify resource needs during the 2029–2032 timeframe. The RFP was issued with the intent to evaluate bid projects and to identify potential resource additions while balancing utility-owned and third party-owned resources to ensure timely development, system reliability, and resource adequacy.

The 2029-2032 RFP evaluation also included analyzing the Reeves disposition at the end of its depreciable life in 2030, as well as determining replacement resources for PNM's share of the FCPP upon expiration of the associated coal supply contract. Furthermore, the 2023 IRP Action

Plan involved assessing resources approaching the end of their contract or depreciable life to determine whether operational extensions were necessary to maintain reliable system operations.

In addition, the 2029-2032 RFP evaluation assessed resource needs driven by PNM's updated load forecast, which included several large load additions:

- Rate 36B customer load increases;
- New large load growth of 350 MW for customers with a signed contract (reimbursement agreement); and
- Additional load of 200 MW to accommodate provisions of Senate Bill 170 (2025 Regular Session) codified as NMSA 1978, Sections 62-6-26(E)-(F).

PNM issued the original RFP in December 2024, soliciting offers for resources delivered by the summers of 2029, 2030, 2031, or 2032. After establishing a short-list of bids, PNM requested a bid refresh to update cost information following federal tax incentive changes implemented in July 2025. The refreshed bids were received by August 8, 2025. To accommodate the schedule adjusted associated with the bid refresh, PNM requested an extension to January 9, 2026, to submit a preferred portfolio to the Independent Monitor. The refreshed bid data was then incorporated into the candidate resource database for formal evaluation.

PNM performed detailed portfolio modeling of shortlisted RFP bids, prioritizing portfolio economics, environmental impacts, and reliability analyses. Bid costs, commercial terms and operating characteristics, and the estimated costs and schedule for required transmission upgrades were fully integrated into the planning models prior to initiating the portfolio analysis.

As a result, PNM determined a preferred portfolio of resources that collectively fit into an integrated planning strategy of coordinating generation, energy storage and transmission to support load growth, economic development and the clean energy transition. Table 1-6 summarizes PNM's preferred portfolio which includes PPAs for solar and wind resources, ESAs for BESS, and a CCN for a small peaking gas facility.

TABLE 1-6. 2029-2032 ALL SOURCE RFP PREFERRED PORTFOLIO

Project	Commercial Structure	Type	Capacity (MW)	Storage Volume (MWh)	Expected Commercial Operation Date
Wildcat	PPA	Solar	90	-	2029
	ESA	Storage	50	200	2029
Palomas	PPA	Wind	800	-	2029
Encino	ESA	Storage	110	880	2029
Britton	ESA	Storage	60	480	2029
TAG II	ESA	Storage	90	720	2029
La Luz II	CCN	Natural gas	40	-	2031

Project	Commercial Structure	Type	Capacity (MW)	Storage Volume (MWh)	Expected Commercial Operation Date
Cat Hills	PPA	Solar	150	-	2031
	ESA	Storage	150	600	2031
Gila Monster	ESA	Storage	150	600	2031

In this resource filing, PNM identified a new 345 kV transmission line, designated the Mid-State Transmission Line, was necessary to deliver the wind energy to customers from the 800 MW Palomas wind project. A term sheet was included in the filing with cost and construction estimates for the project. However, PNM did not request any regulatory approvals for this project as not all required environmental and right-of-way studies can be completed in time for the 2029-2032 resource application filing. PNM plans to seek approval for a CCN in a future application with the commission for the Mid-State Transmission Line.

1.5.8 2029-2032 RFP Supplement

On May 1, 2026, PNM issued a 2029-2032 All-Source Generation Resources RFP Supplement, filed with the NMPRC pursuant to its 2023 IRP Action Plan and a January 2026 Notice of Material Event. The RFP Supplement is structured as a technology-neutral, all-source solicitation seeking 50 to 250 MW of additional accredited capacity to complement resources already identified in the 2029-2032 resource application, which had identified nearly 2,000 MW of new resources, storage, and network upgrades. The supplemental solicitation is driven by the need to address PNM's projected 2029-2032 resource requirements including existing load growth, approximately 600 MW of newly contracted economic-development loads, and a 200 MW proactive load-readiness margin while expanding the field of firm, dispatchable resources beyond the limited natural gas options received in the original RFP.

1.5.9 FCPP Exit Evaluation

PNM evaluated multiple options regarding its ownership share of the FCPP and ultimately determined that continuing participation through 2031 and exiting its ownership thereafter was the most cost-effective approach for customers. Key evaluations and analytical findings are summarized below.

Evaluation of Continued Participation in FCPP through 2038

PNM evaluated whether continued participation in the FCPP beyond 2031 would benefit customers. Conducted as part of PNM's 2029-2032 RFP, this evaluation is documented in Docket No. 26-0000114.

PNM developed baseline assumptions regarding capital improvements, operations and maintenance expenses, and fuel costs required to maintain current MW participation until 2038. The analysis further assumed compliance with ETA carbon emissions caps (200 lbs/MWh) beginning in 2032.

The evaluation revealed that complying with ETA emission limits would require operation of FCPP below the physical minimum load threshold necessary for coal-fired units. Such operation is technically impractical and would substantially reduce the energy output available to serve customer needs. Even if low-load operation were feasible, PNM would remain responsible for its share of fixed costs, including minimum staffing requirements, operations and maintenance expenses, and other plant-related costs.

Furthermore, continued participation through 2038 would require substantial investments in replacement solar and storage capacity to offset reduced FCPP generation and meet emission mandates. Ultimately, maintaining participation in FCPP through 2038 increased the NPV by nearly $500 million relative to the preferred portfolio. Based on these results, PNM concluded that fulfilling its contractual obligations and retiring its ownership share of FCPP in 2031 represents the most economical outcome for customers.

Evaluation of Early Exit from FCPP Prior to 2031

PNM conducted multiple analyses to evaluate retiring its ownership share of the FCPP prior to 2031.

- **Initial 2021 Evaluation:** Supported PNM's FCPP Abandonment filing in Docket No. 21-00017-UT.
- **2024 Updated Assessment:** Performed per the 2023 IRP Action Plan to evaluate a potential exit in 2026.

The 2024 updated assessment determined that an early exit prior to 2031 would not yield reasonable savings for customers. Compared to the 2021 findings, early-exit economics deteriorated due to substantial increases in replacement resource costs, supply chain constraints, and higher costs associated with procuring replacement capacity and energy. Sensitivity modeling demonstrated that if replacement resources were delayed or if future energy and capacity needs differed from forecasts, an early exit could increase customer costs by as much as $385 million NPV.

PNM determined that significant economic risks were associated with retiring FCPP before 2031 and, therefore, favored continuing to use the resource through the end of its current coal contract period. The results of this evaluation were documented in the PNM 2023 IRP First Annual Action Plan Report Update - Docket No. 23-00409-UT.

PNM also evaluated the feasibility of abandonment in 2028. The analysis indicated that replacement resources could not be procured, approved, and operational by 2028, forcing reliance on wholesale market purchases estimated at approximately $300 million based on forward market price forecasts. Additionally, unestablished ownership transfer protocols created significant uncertainty regarding whether abandonment costs could be avoided. Consequently, an early exit prior to 2031 was deemed unviable and cost prohibitive.

1.6 Enhancements for this IRP

For the 2026 IRP, PNM focused on three primary enhancement objectives: strengthening transmission modeling within the expansion process, addressing customer affordability, and broadening candidate options for demand-side management. These enhancements are detailed below:

1.6.1 Expand DSM modeling

AMI serves as a foundational platform for expanding DSM programs and broader grid modernization initiatives. Beyond core metering capabilities, AMI enables enhanced customer energy management tools, time-differentiated rate structures, improved outage management, and greater distribution system visibility. When integrated with distribution automation and ADMS, AMI provides the operational foundation required to deploy more dynamic, flexible DSM programs across PNM's service territory.

PNM engaged ICF to conduct a comprehensive assessment of EE and DR potential. The study identified seven new feasible DR programs, in addition to extensions of the existing programs, providing a broader set of demand-side resources. Modeling assumes a first year of program availability in 2030. This timing reflects both the full deployment of AMI, required for Time-of-Day (TOD) rates, electric vehicle-TOD rates, and behavioral programs, and the timeframe needed to establish technically feasible and affordable structures for direct load control (DLC) programs. Detailed information about these programs is provided in Section 8.1.

1.6.2 Transmission Analysis integration

For this IRP cycle, PNM enhanced its planning process by incorporating nodal transmission modeling alongside its traditional zonal modeling framework. This dual-model approach allows PNM to evaluate how third-party use of the transmission system impacts candidate resource portfolios within PNM's balancing area and explore the viability interconnections with neighboring systems.

Previously, PNM relied solely on a standalone zonal model that used estimated transmission cost adders to account for moving power between areas when new resources were added. In this cycle, the new nodal model incorporates neighboring transmission systems and resource plans, evaluating the three futures (CTP, HEG and LEG) capacity expansion plans along with the four transmission expansion scenarios against four specific operational metrics:

1. System losses
2. Resource curtailment
3. Congestion hours, and
4. Congestion costs

Because the nodal model doesn't capture PNM's financial and regulatory structures, the results were used to determine the need for transmission cost adders for specific remote resources. Cost

adder determinations were then used in a zonal model reevaluation to assess the potential impact on the portfolio resource selection.

1.6.3 Affordability Considerations

PNM's planning environment is changing rapidly. Load growth associated with economic development, electrification, and large energy-intensive customers requires new investments in generation, storage, transmission, and distribution infrastructure. At the same time, the transition away from higher carbon-emitting resources, the need for firm and flexible dispatchable capacity, supply-chain constraints, and changes to federal tax incentives all contribute to upward pressure on costs. Additionally, the desire to remodel a system that originally took 100 years to build, into a compressed 20-year timeframe further challenges costs. The IRP therefore considers not only the least-cost mix of resources, but also considers timing, risk profile, and customer impact of resource and transmission decisions over the planning horizon.

PNM's affordability approach is guided by several principles. First, customers should receive safe and reliable service at just and reasonable rates. Second, new costs should be assigned consistent with cost causation, particularly where new large loads drive incremental system requirements. Third, portfolios should be evaluated for long-term value, not only near-term capital cost, because least-regrets transmission, a diversified resource mix, regional market participation, and grid-enhancing technologies may help reduce customer costs and mitigate reliability risk. Fourth, planning should preserve flexibility so that PNM can adjust procurement timing and resource selections as load, technology costs, market conditions, and customer commitments become clearer. These topics are discussed in more detail in Section 9.8.2.

Through this IRP, PNM seeks to advance a portfolio that balances affordability, reliability, and environmental performance while preserving the flexibility needed to respond to changing customer and system conditions and providing insights into how costs are affected by various types of futures and sensitivities.

2. Planning Landscape

Chapter Highlights

1. Growing electricity demand from data centers, electrification, and economic development is increasing the need for new generation, transmission, and grid infrastructure.
2. State and federal energy policies continue to shape PNM's decarbonization strategy, resource planning, and investment decisions.
3. Rising technology costs, supply chain constraints, and evolving federal incentives are changing the economics and development timelines of new resources.
4. Emerging technologies, expanding regional markets, and transmission development are creating new pathways to support reliability, affordability, and clean energy goals.

The pace of change within the utility industry has accelerated significantly since the previous IRP. While previous cycles focused on the long-term viability of a transition to carbon-free energy, the 2026 IRP is developed during a period of significant growth in energy demand across the nation. PNM is navigating a landscape where the increasing requirement for new generation must be balanced against the technical and logistical timelines for transmission expansion and supply chain delivery. This section explores the key policy, market, and technological forces that shape the 2026 planning landscape.

2.1 Shifting National Demand Dynamics

For much of the last half-century, the growth of electricity demand has been relatively modest. Resource planning during this extended period of limited growth focused primarily on maintaining a stable system footprint, replacing aging infrastructure, and modernizing the generation fleet within a predictable demand envelope.

In recent years, the national outlook for electricity demand growth has fundamentally shifted, primarily due to the rapid development of large-scale digital infrastructure. Across the United States, the expansion of data centers, fueled by the increasing demand for cloud computing and artificial intelligence, is creating concentrated pockets of high-intensity, round-the-clock electricity demand. These facilities often require significant capacity and high levels of reliability, necessitating a faster pace of resource procurement and interconnection than seen in previous decades. The magnitude of current expected growth has led to significant upward revisions to

load forecasts across the country; this phenomenon is described in NERC's 2025 Long Term Resource Assessment:

> *"Electricity peak demand and energy growth forecasts over the 10-year assessment period continue to climb higher than at any point in the past two decades. Over the 10-year period, aggregated assessment area, summer peak demand is forecasted to rise by over 224 GW. This is 69% higher than last year's 10-year growth projection of 132 GW. Winter peak demand is expected to grow by 245 GW, continuing to outpace summer and exceed prior-year projections. New data centers for artificial intelligence and the digital economy account for most of the projected increase in North American electricity demand over the next 10 years."*[2]

Secondary to the surge in large customer growth, electrification of vehicles and buildings is also contributing to increased loads on the electric system. National and regional efforts to decarbonize the transportation and building sectors are shifting energy demand from fossil fuels to the electric grid. As EV adoption increases and building heating systems transition to electric heat pumps, utilities must plan for increasingly dynamic load shapes and higher winter and summer peak demand requirements.

For a utility like PNM, these trends introduce a critical layer of complexity to the 2026 IRP. PNM must not only execute the technically demanding task of replacing aging thermal generation with carbon-free alternatives but must also scale the grid to accommodate a potentially substantial surge in demand. This dual requirement, decarbonizing the existing fleet while expanding total system capacity, necessitates a significant and flexible procurement strategy to navigate a market where competition for limited manufacturing capacity and specialized labor has never been higher. Because the exact pace and magnitude of this demand shift remain uncertain, PNM tests its resource strategy across distinct modeled futures, ranging from current trends and policies to high-growth scenarios driven by accelerated electrification and additional economic development growth. Evaluating these diverse pathways allows PNM to identify resilient, flexible capacity solutions that safeguard reliability and affordability regardless of which energy future unfolds.

2.2 State Energy Policies and Priorities

The regulatory environment remains a primary driver of resource selection for the Company. Since 2023, the federal landscape has shifted from the broad-based stimulus of the IRA to the more specific, domestic-focused mandates of the OBBBA. Simultaneously, New Mexico's ETA continues to provide the statutory guardrails for decarbonization milestones.

In parallel, state and local policies, along with clean energy commitments, continue to serve as primary drivers for the transition to carbon-free resources. Numerous states across the Western Interconnection have established rigorous decarbonization goals and clean energy mandates for

[2] "Long-Term Reliability Assessment." NERC. January 2026. Available at https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf.

the electric sector, necessitating timely investments in new renewable generation and energy storage.

These regional policies and the resulting shifts in the resource mix over the coming decades have direct and significant implications for PNM. The increasing regional development of variable renewables and energy storage is fundamentally altering the landscape. These changes impact both the timing and nature of regional reliability risks and the day-to-day dynamics observed in wholesale energy markets.

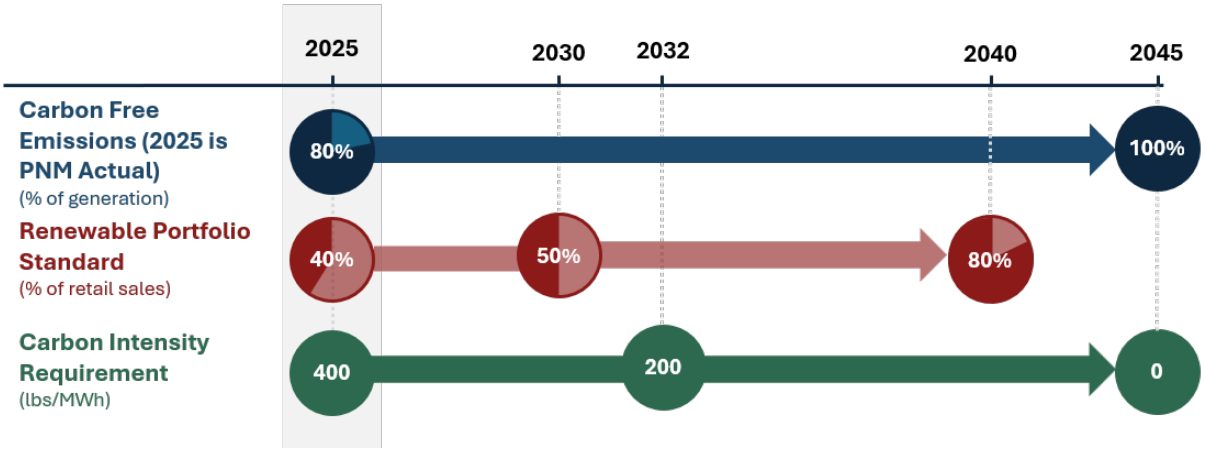
2.2.1 The ETA and PNM's Decarbonization Goals

The passage of New Mexico's ETA in 2019 represented a landmark shift in the state's energy policy, establishing a series of milestones to guide the transition of New Mexico's electricity supply towards carbon-free sources. Looking forward, the ETA remains the definitive regulatory foundation, establishing the roadmap that shapes the Company's resource selection and portfolio modeling. The core elements of the ETA include:

- **Coal Abandonment and Securitization:** The ETA created a structured pathway for utilities to transition away from coal-fired generation. By taking advantage of this mechanism, PNM successfully utilized securitization financing to recover undepreciated investments, decommissioning costs and workforce transition funds associated with abandoning the San Juan Generating Station (SJGS) coal plant. In exchange for utilizing these financing tools, PNM is bound by the ETA's strict carbon intensity limits. Under state regulations, PNM's generating fleet was limited to an average of 400 lbs CO_2/MWh beginning in 2023, with a further reduction to 200 lbs CO_2/MWh required by 2032.
- **Expansion of the RPS:** The ETA significantly increased the state's renewable energy requirements through amendments to the Renewable Energy Act,[3] establishing RPS compliance targets of 40% by 2025, 50% by 2030, and 80% by 2040. PNM has successfully met and exceeded the 40% requirement for 2025 and is currently on track to exceed the 50% milestone prior to its originally mandated timing of 2030. The establishment of these targets provides a clear signal to the industry regarding the scale of renewable development required in New Mexico over the coming decades.
- **The 2045 Statutory Carbon-Free Goal:** The ETA also established an ultimate target for New Mexico utilities: supplying 100% of retail electricity load with carbon-free resources by 2045. The legislation mandates that reasonable and consistent progress be demonstrated throughout the planning horizon to ensure this goal is met.

[3] New Mexico's RPS program was established with the passage of the Renewable Energy Act (NMSA 1978, §§ 62-16-1 to -10) in 2004 and subsequently amended in 2007 to require IOUs in New Mexico to meet the following renewable energy targets (note that RPS compliance carve-outs resulted in small deviations from these values): 5% of retail sales by 2006, 10% by 2011, 15% by 2015, and 20% by 2020.

FIGURE 2-1. TIMING OF KEY EMISSIONS MILESTONES



2.2.2 NEW MEXICO STATE GREENHOUSE GAS REDUCTION GOALS

In 2019, New Mexico's Governor enacted Executive Order 2019-003, which announced New Mexico's pledge to join the U.S. Climate Alliance and established the state's first formal goal to reduce economy-wide emissions by 45% by 2030, relative to 2005 levels. This commitment underscores a broader state priority to mitigate greenhouse gas emissions.

While this executive order does not establish enforceable planning criteria or direct compliance mandates for individual utility IRPs, it reflects the broader state policy environment in which PNM operates. This overarching focus on decarbonization informs PNM's strategic vision and reinforces the long-term priorities guiding its resource decisions.

- **Significance of Utility Decarbonization**: As the largest electric utility in New Mexico, PNM serves approximately 36% of the state's retail load. The Company's historical 2005 emissions baseline of 7.7 million short tons represents a substantial portion of the state's total emissions. Consequently, achieving New Mexico's economy-wide targets will depend heavily on the direct emissions reductions realized within the PNM resource portfolio. The Company's current trajectory anticipates an emissions reduction of over 80% relative to 2005 levels by 2030, which would represent a significant contribution toward the state's 45% economy-wide goal.
- **The Expanding Role of Electrification:** New Mexico's commitment to a carbon-free economy positions PNM to play an increasingly central to the state's broader energy landscape. Achieving economy-wide decarbonization relies heavily on electrifying sectors that traditionally burn fossil fuels, such as transportation and building heating. While these efforts reduce state emissions, they shift energy demand directly onto the electric grid. To accelerate this transition, the state provides multiple incentives that capture energy efficient programs and products such as appliance upgrades, electrical vehicle purchases, building retrofits and wiring upgrades.

At the time of this 2026 IRP, New Mexico's policy support for electrification continues to evolve. While the Company currently models a level of electrification based on existing trends in its base

case plan, PNM recognizes that future legislative or regulatory actions could accelerate the growth of these new types of electric loads. To capture this potential increase, PNM evaluates an Accelerated Electrification pathway alongside a HEG future. Such a shift would present both significant opportunities to support state goals and new challenges in maintaining grid reliability and resource adequacy in an environment of already rapidly increasing demands.

2.2.3 Senate Bill 170 (Utility Pre-Deployment Act)

Senate Bill 170 (SB 170), enacted during the 2025 New Mexico legislative session and codified as NMSA 1978, Sections 62-6-26(E)-(F), amended Section 62-6-26 and related provisions of the New Mexico statutes to expand the framework for economic development rates and infrastructure planning. Among other provisions, the legislation authorizes a public utility, subject to certification by the New Mexico Economic Development Department and approval by the NMPRC, to develop transmission, distribution, generation, energy storage, and other electric infrastructure in advance of a binding customer commitment when the infrastructure is associated with a certified economic development project. The legislation also establishes an expedited regulatory review process and authorizes prudent development costs associated with qualifying projects to be deferred for future ratemaking consideration.

For PNM's resource planning, SB 170 provides a statutory pathway to develop and recover costs for resources tied to specific, large incremental loads, most notably data center and other commercial/industrial demand, on a timeline and cost-recovery basis independent of the triennial IRP cycle. PNM has already begun utilizing this mechanism, including an application filed with the NMPRC in December 2025 (Docket No. 25-00088-UT) seeking approval of two transmission projects to support economic development, the Westpointe 115-kV Substation Project and the Mesa del Sol project. While the IRP continues to serve as PNM's primary framework for identifying future resource needs, SB 170 supplements that framework by allowing PNM to respond to discrete, time-sensitive load growth.

2.2.4 House Bill 93

House Bill 93 (HB 93) (2025 Regular Session) codified as NMSA 1978, Section 62-17-12, modernized New Mexico's electrical grid by mandating advanced grid technology plans, cost recovery mechanisms for utilities, and authorized self-sourced microgrids in New Mexico, the legislation requires public utilities to file advanced grid technology plans alongside their integrated resource plans, or in advance if preferred. These plans must address transmission-line congestion, propose projects to alleviate congestion, provide cost estimates, and include any additional information requested by the NMPRC.

The key provisions of the legislation include:

- **Advanced Grid Technology Projects:** requires utilities to consider technologies that improve efficiency, capacity, and reliability of transmission and distribution (T&D) systems, including advanced conductors, dynamic line ratings, and other GETs.

- **Cost Recovery:** allows utilities to recover reasonable costs for approved projects through tariff riders, base rates, or a combination, with costs presumed reasonable up to the commission-approved maximum.
- **Commission Review Criteria:** provides the NMPRC criteria to evaluate projects for cost-effectiveness, alignment with grid modernization priorities, energy diversification, and grid security.
- **Self-Sourced Power and Microgrids:** allows entities to develop qualified microgrids that generate and sell electricity. Energy from these microgrids will not be classified as retail sales until 2035, and by 2045, all energy must come from net-zero carbon resources.

Overall, HB 93 aims to enhance grid reliability, reduce greenhouse gas emissions, and increase access to renewable energy. By providing a clear regulatory framework for advanced grid technologies and microgrids, the bill encourages utilities to invest in modernization while ensuring reasonable costs for customers.

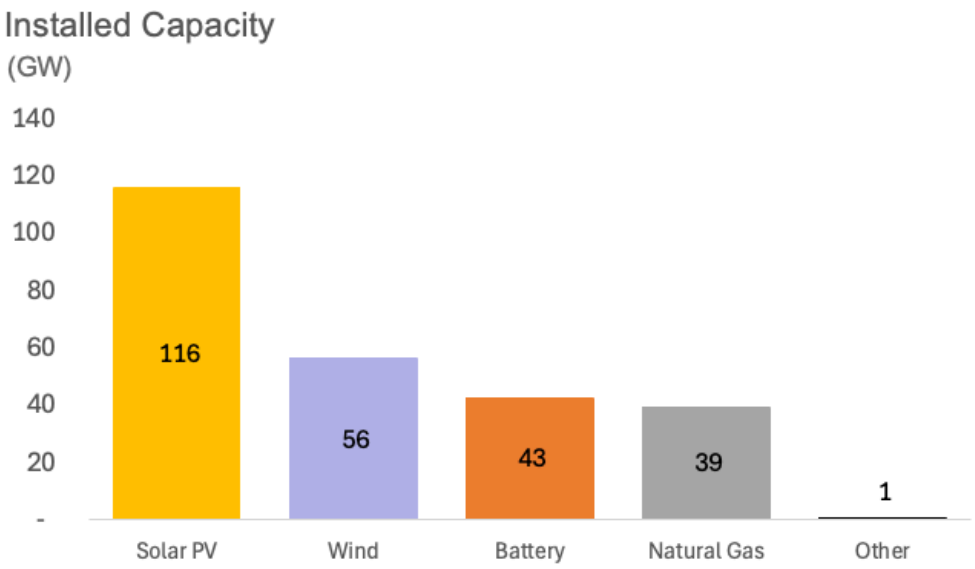
To meet the requirements of HB 93, PNM filed a Grid Modernization Plan and files annual updates on the progress of its efforts. Additionally, PNM analyzes GETs, including but not limited to those outlined in HB 93 in its transmission planning efforts.

This IRP has been prepared in accordance with 17.7.3 NMAC, Integrated Resource Plans for Electric Utilities (the "IRP Rule"); a summary of the IRP Rule's requirements is provided in Appendix G: Rules & Regulatory.

2.3 Technology Trends

The generation mix being built across the United States today looks markedly different from the one utilities planned around even a few years ago. Cost changes, policy shifts, and new grid challenges have reshaped which technologies utilities procure first. Understanding these shifts provides essential context for the resource decisions discussed later in this plan. Across the United States, almost all recent utility-scale generation capacity added to the system to meet growing demands, replace infrastructure, and meet policy and voluntary clean energy goals is accounted for by four technologies: solar, wind, battery storage, and natural gas. Figure 2-2 shows the capacity of new resources added for each of these technologies over the six-year period from 2020 to 2025.

FIGURE 2-2. INSTALLED CAPACITY OF NEW RESOURCES IN THE UNITED STATES, 2020-2025[4]

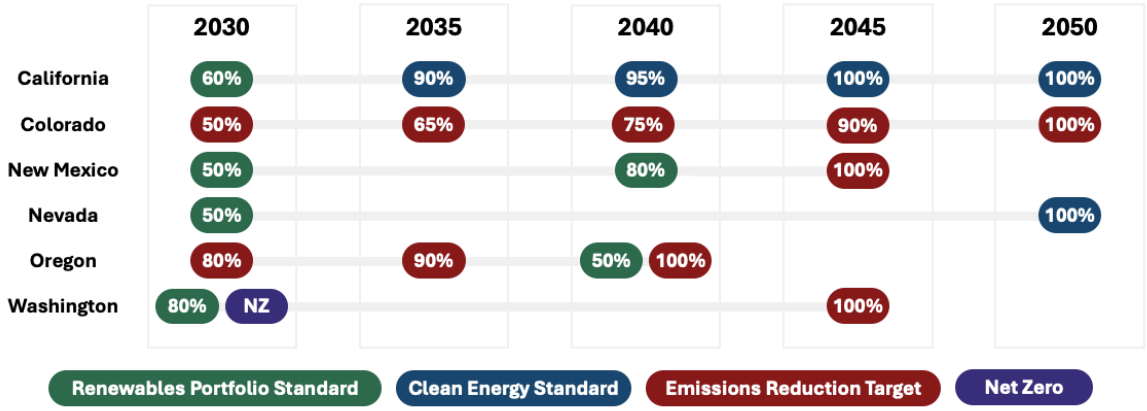


The types and quantities of resource additions are influenced by a variety of factors, but are generally driven by two major considerations:

1. The need to maintain bulk system reliability as load grows and aging resources reach the ends of their lives; and
2. The state policy and voluntary utility goals that require additions of renewables and/or low-carbon resources to the electricity system (see Figure 2-3 for a summary of relevant policies in the Western United States).

[4] Derived from data produced by "Form EIA-860 detailed data with previous form data." U.S. EIA. Available at https://www.eia.gov/electricity/data/eia860/

FIGURE 2-3. CLEAN ENERGY TARGETS BY STATE IN THE WESTERN INTERCONNECTION



Additional voluntary goals include APS (Net zero by 2050), SRP (82% GHG intensity reduction by 2035, net zero by 2050) TEP (80% GHG reduction by 2035, net zero by 2050); Idaho Power (100% clean energy by 2045); Los Angeles Dept of Water & Power (100% clean energy by 2035); Sacramento Muni Utilities District (100% clean energy by 2030)

While installed capacity provides a useful measure of how much new infrastructure has been developed, these four technologies are not direct substitutes for one another, and a megawatt of each one provides different value to the electricity grid. The drivers at play behind the additions of these types of resources are intrinsically linked to the capabilities that they provide the electricity system:

- **Solar and wind,** by installed capacity, account for the majority of new resource capacity added to the US electricity system since 2020, representing approximately two thirds of all new capacity. These two technologies have emerged as the lowest-cost scalable sources of renewable (and carbon-free) energy, and a significant driver behind their adoption at scale has been the increasingly ambitious state policies and voluntary goals set by utilities to transition towards clean electricity resources. At the same time, solar and wind are inherently variable resources, their ability to generate electricity varies from hour to hour based on changing meteorological conditions, and therefore they are limited in their ability to provide dependable capacity to the electricity system during periods of peak system need.
- Another dramatic shift since 2020 has been the commercial liftoff of **grid-scale battery storage**. At the time of PNM's 2020 IRP, the national storage footprint was a modest 1,500 MW. By the end of 2025, that figure exploded to approximately 50,000 MW. This rapid growth was in part driven by the necessity of managing net load challenges, the steep ramp in demand that occurs when solar production drops off in the evening. This evolution has transformed battery storage from an experimental grid asset into an essential tool for ensuring reliability in a high-renewables portfolio.
- **Natural gas** is the fourth largest segment of new resource additions across the country. As a firm resource able to dispatch when and for as long as needed, natural gas complements variable and energy-limited resources through its ability to serve loads when

other resources are not available. For this reason, natural gas capacity additions are often primarily motivated by the reliability that they provide to the electricity system.

The remainder of this section discusses key trends and developments impacting these technologies, including recent upward pressures on cost, changes to federal tax credits, and extended project development timelines; as well as recent developments among emerging technologies that have not yet been widely deployed at scale.

2.3.1 Rising Technology Costs

While costs for most new generation technologies were either stable (natural gas) or declined (solar, wind, and storage) in the decade from 2010 to 2020, costs for many technologies have risen substantially.

The rising costs observed across the industry are the result of several intersecting factors:

1. **Global Supply Chain Concentration and Geopolitical Risk:** The supply chain for clean energy remains highly centralized. China currently accounts for 40% to 97% of global solar and battery component manufacturing, depending on the specific part. Furthermore, China processes approximately 60% of the critical metals essential for wind, solar, and storage technologies. The ongoing implementation of the OBBBA's "Prohibited Foreign Entity" rules and the imposition of steep import tariffs has further tightened supply, as developers must now bypass these established global leaders to secure tax-credit-eligible components, often at a premium.
2. **Expansion of Trade Policy Risks:** In addition to inflationary pressures, the 2026 IRP modeling must account for the widening gap between global commodity prices and the "landed cost" of equipment in the U.S. Due to significant trade enforcement and anti-circumvention duties, PNM and its developers are facing higher contingency margins and "tariff pass-through" clauses in new energy storage and power purchase agreements.
3. **Inflationary Pressures on Raw Materials:** Sustained inflation has driven up the costs of essential raw materials, such as lithium, cobalt, and copper, as well as the specialized labor required for large-scale infrastructure. These inputs are the primary drivers of the hard costs associated with battery enclosures and power conversion systems.
4. **Impact of High Interest Rates on Capital-Intensive Assets:** To combat inflation, the Federal Reserve has maintained elevated interest rates compared to the previous decade. Because renewable and storage projects are front-loaded with significant capital expenditures (CapEx) rather than ongoing fuel costs, the cost of financing has an outsized impact on their levelized cost. High interest rates essentially increase the hurdle rate for new projects, which developers pass through to utilities via higher PPA and ESA pricing.
5. **Compounding Demand and Market Competition:** Federal, state, and local decarbonization mandates, coupled with the rapid growth of load from data centers and electrification, have created a seller's market for clean energy resources. This surge in demand is currently outstripping the pace of domestic manufacturing expansion, further exacerbating supply chain constraints and permitting delays.

These factors have significant impacts on the relative economics of different resource options for PNM's portfolio and the associated costs of different portfolio options.

Wind and Solar

Preliminary trends of increasing wind and solar prices observed in the 2023 IRP have persisted and become more pronounced over the past three years. The factors described above, particularly global supply chain constraints, inflationary pressures, and increased competition for equipment, have been some of the largest drivers of these continuing price increases. Recent market data demonstrate that these trends have extended beyond a temporary market disruption and are now reflected across multiple industry cost metrics.

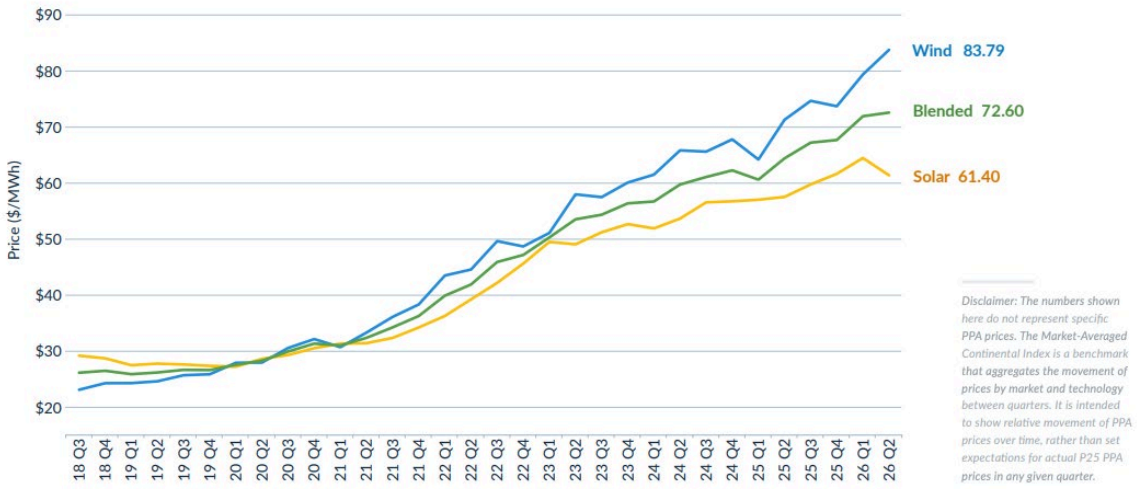
Key indicators include:

- **Stalled Capital Cost Declines:** While capital costs represent only one component of total project costs, the long-term decline in utility-scale solar capital costs has effectively plateaued. The 2025 Lawrence Berkeley National Laboratory (LBNL) Utility-Scale Solar Update[5] reported that capacity-weighted installed costs for projects entering service in 2024 increased by approximately 1% over 2023, reaching $1.61/WAC ($1.22/WDC).
- **Levelized Cost of Energy (LCOE) Increases:** The same LBNL report found that generation-weighted LCOE from utility-scale solar has increased by 25% since 2022, up to $60/MWh without tax credits or $41/MWh with tax credits in 2024. The LBNL report cites higher financing costs and falling national average capacity factors as key drivers for solar LCOE increases.
- **PPA Price Escalation:** As of the Q2 2026 LevelTen Energy PPA Price Index[6], shown in Figure 2-4 below, average North American solar PPA prices reached $61.40/MWh, while wind prices rose to $83.79/MWh. Q1 and Q2 2026 PPA prices represent the highest rates reported since LevelTen began indexing data in 2018. These PPA prices reflect an average year-over-year solar PPA cost increase of 13% and wind PPA cost increase of 9%.

[5] Seel, et al. "U.S. Utility-Scale Solar 2025 Data Update." Lawrence Berkeley National Laboratory. October 2025. Available at https://emp.lbl.gov/sites/default/files/2025-10/Utility%20Scale%20Solar%202025%20Edition%20Slides.pdf

[6] "Q2 2026 PPA Price Index Executive Summary." LevelTen Energy. Available at https://go.leveltenenergy.com/2026Q2_NA_PPAPriceIndex_ES

FIGURE 2-4. MARKET-AVERAGED CONTINENTAL INDEX SOLAR AND WIND PPA PRICES

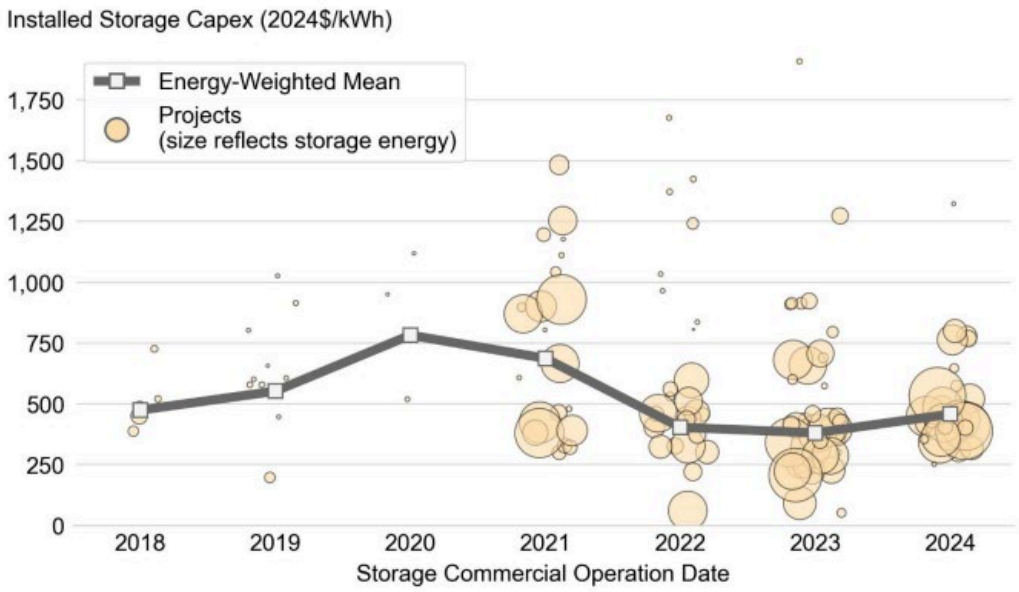


The accelerated phase-out of federal clean energy tax credits under the OBBBA is expected to further increase costs of wind and solar projects that begin construction after mid-2026. In addition, import tariffs implemented during 2025 and 2026 have begun increasing the cost of renewable energy equipment and components. The magnitude and duration of these impacts remain uncertain due to evolving tariff implementation and ongoing legal challenges. Together, these factors create additional upward pressure on solar and wind project costs beyond the increases reported to date.

Battery Storage

Unlike solar and wind, where broad equipment cost increases have been more widespread, utility-scale battery storage prices have generally been more stable as battery cell manufacturing has expanded. This trend can be seen in Figure 2-5 below.

FIGURE 2-5. INSTALLED COSTS OF CO-LOCATED BATTERY STORAGE, 2018-2024[7]



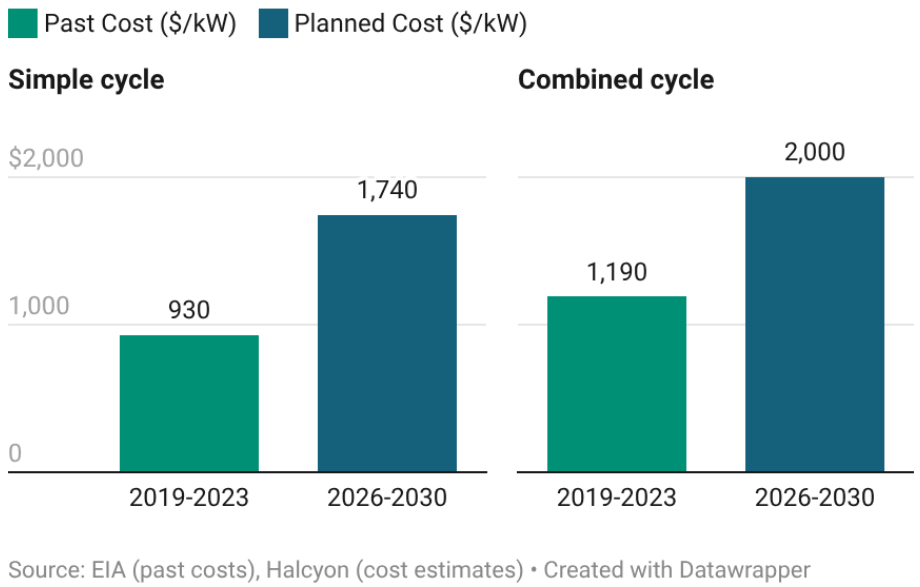
However, utility-scale projects still face cost pressures driven by balance-of-plant equipment, labor, and tariffs. PNM experienced these shifting market realities directly during the recent renegotiation of the San Juan ESA. The resulting 24% price increase over the original contract was primarily driven by the exhaustion of legacy pricing tiers and the need to align with current market procurement structures, rather than a fundamental spike in battery technology costs.

Natural Gas

Cost increases for natural gas generation have been driven largely by growing demand for firm, dispatchable capacity. The rapid expansion of data centers, advanced manufacturing, and other high-load-factor customers has increased the need for reliable, around-the-clock power. Unlike traditional weather-sensitive or peaking loads, these customers require continuous 24/7 service that cannot be met by intermittent renewable resources or short-duration battery storage alone. Consequently, the need for dispatchable resources has increased substantially. Natural gas generation, specifically simple-cycle combustion turbine generators and combined-cycle gas turbines, remains a primary mechanism to provide this firm, on-demand operational flexibility.

[7] Seel, et al. "U.S. Utility-Scale Solar 2025 Data Update." Lawrence Berkeley National Laboratory. October 2025. Available at https://emp.lbl.gov/sites/default/files/2025-10/Utility%20Scale%20Solar%202025%20Edition%20Slides.pdf

FIGURE 2-6. U.S. TREND OF INSTALLED COST OF NATURAL GAS POWER PLANTS[8]



However, securing this dispatchable capacity has become significantly more capital-intensive.

The report further observes that "these elevated costs are likely to persist rather than decline, at least in the short-to-midterm."

Impact of Import Tariffs and Trade Enforcement

The transition toward domestic supply chains under the OBBBA is occurring simultaneously with a period of heightened trade enforcement. For PNM, federal import tariffs represent a direct upward pressure on the capital costs of new resources, often offsetting the pricing benefits of technological maturation. Key trade-related cost drivers include:

- **Escalating Section 301 Duties:** Section 301 tariffs on non-EV lithium-ion batteries stand at 25%, while duties on solar cells and modules remain at 50%. These tariffs ensure that the cost of global supply cannot undercut the higher price points of emerging domestic manufacturers.
- **Upstream Critical Mineral Duties:** New 25% duties on natural graphite and permanent magnets, essential for battery anodes and wind turbine generators, have further increased the cost of even "Western-assembled" components that rely on refined global materials.
- **Anti-Circumvention and Reciprocal Duties:** The expansion of Antidumping and Countervailing Duties on Southeast Asian manufacturing hubs, combined with broader baseline reciprocal tariffs, has curtailed developers' ability to route around traditional

[8] Wiser et al. "Retail Electricity Price Trends and Drivers: Data Update — 2026 Edition." LBNL/Brattle Group. July 2026. Reproduced with permission.

supply chains. This leaves entities like PNM facing a higher-cost, domestic-focused procurement path for major project components.

2.3.2 Federal Tax Credits

The federal policy environment remains a fundamental factor influencing the economic evaluation of resources in the 2026 IRP. PNM's 2023 IRP was published shortly after the passage of the landmark IRA, which established a broad slate of tax incentives and government funding collectively intended to accelerate a transition towards lower carbon sources of electricity. Since the previous planning cycle, the landscape has shifted from the long-term incentives of the IRA to the more restrictive requirements of OBBBA. This new legislation significantly reduces the opportunities to benefit from federal tax credits by accelerating phase-outs for certain technologies and adding new eligibility restrictions.

Accelerated Phase-out Timelines for Variable Resources

The OBBBA altered the eligibility window for wind and solar projects, introducing compressed timelines for federal support that differ from previous planning assumptions.

- **The July 4, 2026 Construction Deadline:** Under the OBBBA, wind and solar resources must begin construction by July 4, 2026, to remain eligible for federal tax credits under standard multi-year deployment schedules. If a project misses this July 2026 construction milestone, it faces an immediate tax credit expiration unless it can be fully placed in service on or before December 31, 2027. This creates a severe near-term development crunch, compressing the long-term runway originally projected under the IRA into a tight, immediate compliance window.
- **Differential Eligibility Horizons:** The OBBBA departs from the uniform technology-neutral framework of the IRA by establishing divergent phase-out schedules for different technologies. While wind and solar face an accelerated expiration of federal tax credits, the OBBBA maintains longer eligibility windows for clean firm technologies, such as geothermal, nuclear, and battery energy storage, which remain eligible for full incentives into the 2030s.
- **Impact on Resource Parity:** These varying federal eligibility timelines require PNM to re-evaluate the comparative long-term economics of alternative resource options. The 2026 IRP modeling accounts for the reality that certain renewable resources (e.g., wind and solar) will lose federal tax credits sooner than alternatives (e.g., battery energy storage), impacting the total cost of ownership and the optimal portfolio mix for PNM's customers.

Tax Credit Tiers and the Impact of the OBBBA

While the OBBBA preserved the foundational tax credit structure established by the IRA, it introduced stringent Foreign Entity of Concern (FEOC) restrictions designed to secure domestic supply chains. The tax credit framework continues to operate on a tiered model, but with critical new procurement safeguards:

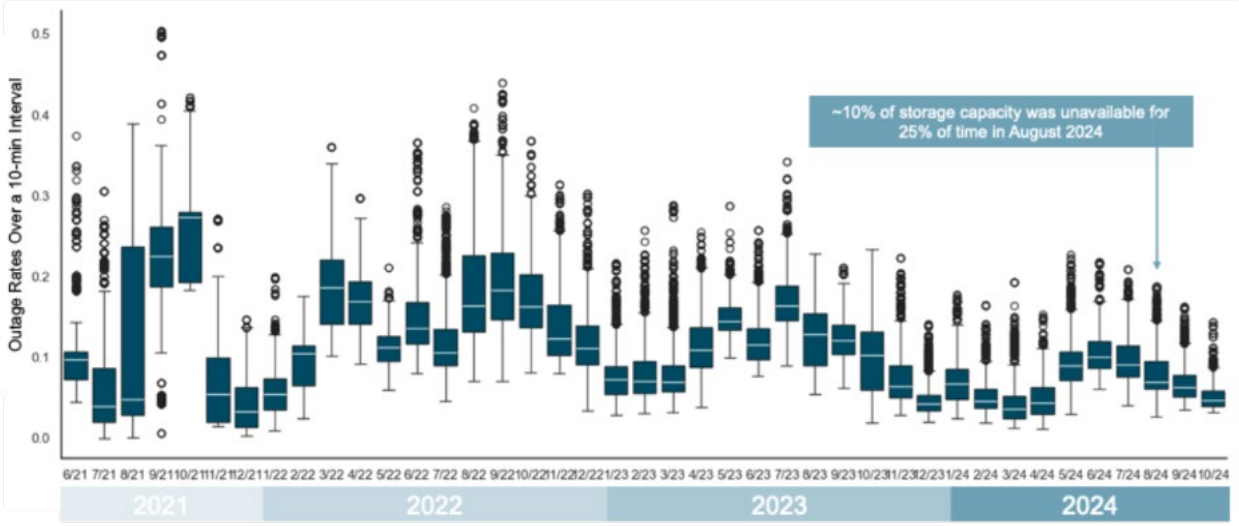
- **Base and Prevailing Wage Credits:** All eligible technologies can claim a base credit, 6% for Investment Tax Credit (ITC) or approximately $5/MWh for production tax credit (PTC). This value is multiplied by five for projects that meet prevailing wage and apprenticeship requirements, bringing the credits to 30% for ITC and approximately $26/MWh for PTC. The OBBBA preserved this baseline tier framework from the original IRA.
- **Domestic Content Adders:** Originally created under the IRA, the 10 percentage point bonus adder for domestic content remains intact under the OBBBA. To qualify, projects must meet specific thresholds for U.S.-sourced steel, iron, and manufactured products. Failing to meet these thresholds does not disqualify a project from receiving the standard baseline credit, but developers cannot claim the extra bonus.
- **Energy Community Adders:** The OBBBA preserved the IRA's 10 percentage point bonus adder for projects located in designated energy communities, such as brownfield sites, historical fossil-fuel economic areas, or coal mine/plant closure communities, and expanded eligibility to EnCompass™ nuclear energy communities. Stacked with the domestic content bonus, a fully compliant project can reach up to a 50% total ITC (or equivalent PTC boost).
- **FEOC Exclusions:** A critical provision of the OBBBA is the exclusion of tax credits for projects that utilize components, particularly battery cells or critical minerals, sourced from designated "entities of concern." While developers bear the direct burden of proving supply chain compliance, this shift potentially increases project costs and bid prices for PNM as developers pass along the higher expense of securing compliant, non-FEOC equipment.

2.3.3 Resource Performance Trends

Aligning real-world battery storage performance, including capacity degradation rates and forced outage rates, with long-term planning assumptions is critical for developing plans that will meet PNM's customer needs. Although grid-scale battery storage lacks the extensive operational history of conventional thermal resources, a decade of industry experience now provides crucial insight, helping reduce uncertainty in key resource planning assumptions.

The 2023 IRP highlighted that the rate of forced outages in data reported by the CAISO exceeded 10% across all storage resources, which was higher than most manufacturers' specifications for expected outage rates. In revisiting this finding, more recent data from CAISO indicates that forced outage rates have been declining over time and have started to align with manufacturers' specifications. The figure below shows the distribution of the utility-scale storage forced outages rate for all installed capacity in the CAISO for every 10-minute interval in a month from October 2021 to October 2024. Over this three-year period, there has been a noticeable decline in the median monthly forced outage rate, suggesting technology performance has matured as more storage has been deployed.

FIGURE 2-7. CAPACITY-WEIGHTED FORCED OUTAGE RATE OF CAISO UTILITY-SCALE BATTERIES (JUNE 2021-OCTOBER 2024)



Other more recent studies support this claim. An IEEE study "Forced Outage Rate of Utility-scale Energy Storage Units"[9] reported that the equivalent forced outage rate for utility-scale battery storage in ERCOT is 4.82%. As more data emerges both within PNM's system and from the industry more broadly, PNM will continue to align and adjust as needed its planning inputs and assumptions to improve robustness of its modeling.

2.3.4 PROJECT DEVELOPMENT TIMELINES

The fundamental economic driver behind rising supply-side costs is an unprecedented expansion in electricity demand that has rapidly outpaced equipment manufacturing capacity, specialized labor, and raw materials. Global supply chain constraints have severely extended delivery schedules for long-lead-time equipment, most notably main power transformers, combustion turbines, and high-voltage circuit breakers, stretching procurement timelines from months to several years. In this market environment, securing critical utility infrastructure requires far greater forward lead time than in past planning cycles.

To adapt to these extended lead times, PNM has fundamentally evolved its procurement framework by expanding its forward planning horizon. As demonstrated by the focus period in this IRP, PNM now provides an extended runway necessary to order long-lead equipment earlier, navigate manufacturing backlogs, and execute competitive solicitations far enough in advance to insulate project schedules and ensure timely system additions.

[9] Shuai, H. & Tomsovic, K. "Forced Outage Rate of Utility-Scale Energy Storage Units." IEEE Xplore. March 23, 2026. Available at https://ieeexplore.ieee.org/document/11438461

2.3.5 Emerging Technologies

While research, development, and deployment activities are accelerating industry-wide, technical modeling for the 2026 IRP underscores a fundamental reality: reaching a fully decarbonized, reliable grid will require the integration of technologies that are not currently commercially mature at utility scale. As traditional thermal capacity retires, a structural gap remains between variable renewable generation and continuous, high-reliability customer demand. Short-duration battery energy storage can manage intra-day shifts, but closing the multi-day and seasonal reliability gap requires resources that can deliver sustained, dispatchable capacity without greenhouse gas emissions.

A central focus of PNM's 2026 IRP stakeholder process was determining how to responsibly model emerging technologies without over-relying on speculative assumptions. To establish a defensible, data-driven foundation, PNM partnered with EPRI to develop detailed cost trajectories, heat rates, round-trip efficiencies, and commercialization timelines across three core emerging technology categories:

- **LDES:** Technologies capable of discharging energy over days or weeks, rather than hours, to maintain reliability during extended periods of low renewable production.
- **Next-Generation Carbon-Free Generation:** Emerging baseload or load-following resources that provide dependable, dispatchable power without greenhouse gas emissions.
- **Advanced Thermal and Alternative Fuels:** Advancements in existing thermal infrastructure that would allow for the use of carbon-free fuels.

In the 2026 IRP, these technologies are represented using generic cost and performance proxies to chart a long-term directional path for portfolio optimization. However, PNM recognizes that generic modeling assumptions are no substitute for market-tested pricing and firm commercial guarantees.

Inclusion in the IRP Action Plan does not constitute an immediate procurement commitment. Instead, it serves as a call to market: emerging technology vendors must participate in future competitive All-Source RFPs to replace these generic proxies with binding, market-validated data. Final procurement decisions will strictly depend on whether these next-generation technologies

can bid into competitive solicitations and demonstrate that they can satisfy PNM's core statutory obligations, ensuring 24/7 system adequacy, operational safety, and customer affordability.

Stakeholder Input: Focus on Emerging Technologies

Stakeholders expressed significant interest in the role of emerging technologies, particularly enhanced geothermal, in supporting PNM's long-term decarbonization goals. These participants emphasized that "clean firm" resources are vital for maintaining system reliability as the portfolio transitions away from traditional thermal generation. While these technologies are currently in various stages of developmental maturity, stakeholders encouraged PNM to evaluate alternative scenarios under varying assumptions.

FIGURE 2-8. LONG DURATION STORAGE TECHNOLOGIES CHARACTERIZED IN US DEPARTMENT OF ENERGY'S PATHWAYS TO COMMERCIAL LIFTOFF: LONG-DURATION ENERGY STORAGE [10]

NON-EXHAUSTIVE – HYDROGEN AND HYBRID LONG DURATION STORAGE EXCLUDE

Faces geologic constraints[4] | Not enough public datapoints to obtain a reliable value | Less Desirable → More Desirable

Inter-day | Can function as both | Multi-day/week

Duration	Energy storage form	Technology	Nominal duration, hrs	LCOS[5], $/MWh	Min. deployment size, MW	Average RTE, %	TRL
Inter-day	Mechanical	Traditional pumped hydro (PSH)	0–15	70–170	200 – 400	70–80	9
		Novel pumped hydro (PSH)	0–15	70–170	10–100	50–80	5-8
		Gravity-based	0–15	90–120	20–1,000	70–90	6-8
		Compressed air (CAES)	6–24	80–150	200–500	40–70	7-9
		Liquid air (LAES) [1]	10–25	175–300	50–100	40–70	6-9
		Liquid CO2 [1]	4–24	50–60	10–500	70–80	4-6
Multi-day / week	Thermal	Sensible heat (e.g., molten salts, rock material, concrete) [2]	10-200[2]	300	10–500	55–90	6-9
		Latent heat (e.g., aluminum alloy)	25–100	300	10–100	20–50	3-5
		Thermochemical heat (e.g., zeolites, silica gel)	XX	XX	XX	XX	XX
	Electrochemical	Aqueous electrolyte flow batteries	25–100	100-140	10–100	50–80	4-9
		Metal anode batteries	50–200	100	10–100	40–70	4-9
		Hybrid flow battery, with liquid electrolyte and metal anode (some are Inter-day) [2,3]	8–50[2]	XX	>100	55–75	4-9

2.4 Markets and Regional Coordination

Most of the Western Interconnection operates as a patchwork of individual Balancing Authorities and utilities, unlike regions organized under Regional Transmission Organizations (RTOs) or Independent System Operators (ISOs). Historically, these entities, including PNM, planned

[10] "Pathways to Commercial Liftoff: Long-Duration Energy Storage Opportunities." U.S. Department of Energy. Available at https://www.energy.gov/sites/default/files/2023-09/Pathways%20to%20Commercial%20Liftoff%20Long%20Duration%20Energy%20Storage%20Opportunities_508.pdf

resources and operated their systems independently, coordinating primarily through long-term contracts and bilateral wholesale trading. Each utility remains responsible for reliably planning and procuring its own resources. Regional energy markets and resource adequacy programs do not replace that obligation; rather, they add a new layer of economic optimization, system efficiency, and reliability coordination.

Regional markets improve efficiency when prices, transmission availability, and system conditions allow energy to move between participants. However, arriving with sufficient capacity remains each utility's responsibility. This concept was introduced in 2014 through the Western Energy Imbalance Market (WEIM), which optimizes resources already online in real time. Organized day-ahead markets are now extending that optimization into the next-day timeframe, helping ensure the right resources are committed and ready before each operating day.

A parallel evolution is underway in the longer-term planning timeframe, where emerging regional resource adequacy programs aim to add a regional perspective to utility planning. These programs are intended to increase visibility into resources being procured across the region, support common planning metrics, and demonstrate adequacy and deliverability, helping reduce unnecessary or duplicative resource costs for customers over time.

2.4.1 Organized Wholesale Energy Markets

Western regional energy markets are undergoing rapid structural change, with several market constructs and governance models advancing at the same time. One major thread is governance reform for programs currently operated by CAISO, the WEIM and EDAM, and a potential future regional resource adequacy program. A new Regional Organization is being formed to eventually govern these CAISO-operated market functions, addressing long-standing concerns about independent regional decision-making while preserving the operational benefits of broader market coordination.

SPP Market Options

Southwest Power Pool (SPP) offers a parallel set of western market options, including the Western Energy Imbalance Service (WEIS), Markets+, and an expanding SPP RTO footprint. In resource adequacy, WRAP laid important groundwork by advancing common planning concepts, forward-showing expectations, and regional visibility into resource sufficiency. As discussed below, PNM and other EDAM participants elected to leave WRAP in Q4 2025 in favor of a resource adequacy approach aligned with EDAM; see Section 6, Reliability & Resource Adequacy, for further detail.

PNM's Participation in Wholesale Markets

The remainder of this section describes how PNM is navigating this evolving landscape, including the analysis supporting its market-participation decisions and the implications for future Integrated Resource Planning. Together, these considerations connect regional market evolution, resource adequacy alignment, and PNM's long-term portfolio choices under the IRP process.

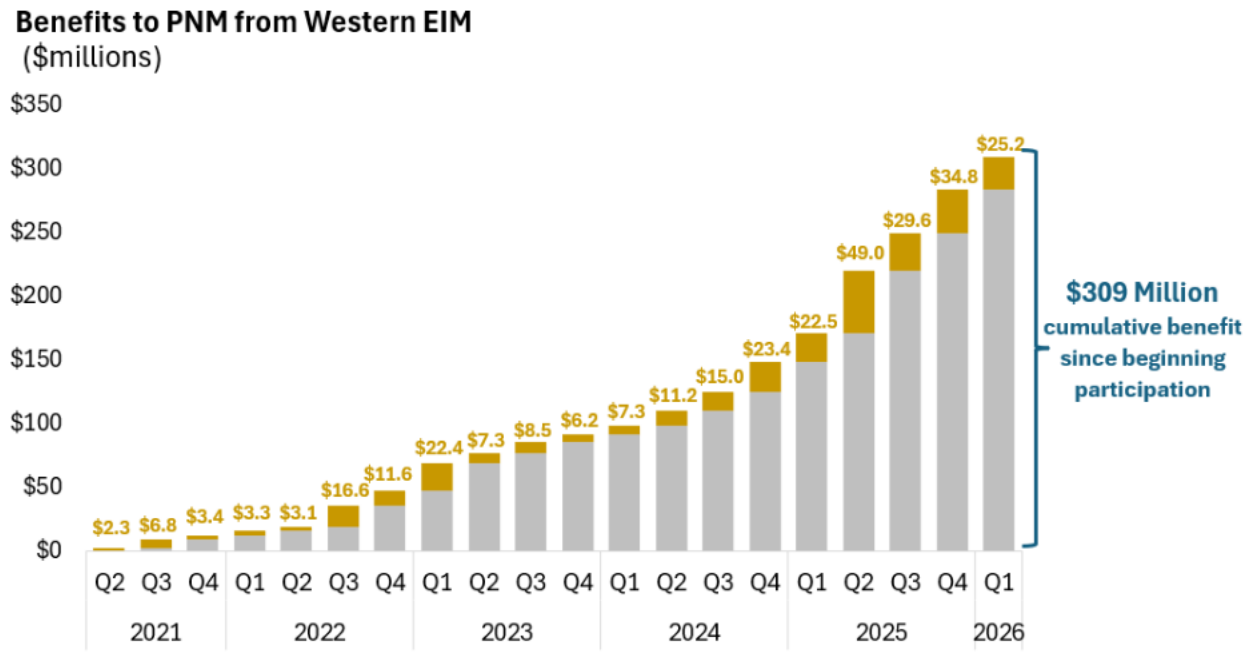
FIGURE 2-9. GENERATION PLANNING AND MARKET OPERATIONS TIMESCALES ALIGNED WITH EMERGING REGIONAL COORDINATION EFFORTS

Western Energy Imbalance Market

The WEIM, introduced in 2014, was the West's first major step toward organized regional market coordination. It is a voluntary, real-time energy market that allows participating balancing areas to access energy across a broader regional footprint close to the time it is needed. The WEIM does not replace each utility's responsibility to plan for and procure sufficient resources. Instead, it optimizes the dispatch of resources already online by identifying lower-cost energy that can move between participants when transmission and system conditions allow, helping balance supply and demand, reduce reliance on more expensive local dispatch, and improve the use of available generation and transmission in real time.

Ahead of PNM's participation, the NMPRC issued an order in Docket No. 18-00261-UT allowing PNM to seek potential recovery of WEIM-related costs in future rate cases and requiring compliance reports on WEIM costs and savings. PNM joined the WEIM in April 2021. Since then, participation has consistently benefited customers, with estimated quarterly benefits ranging from $2 million to $49 million. Through the first quarter of 2026, PNM's cumulative customer benefit from WEIM participation is estimated at $309 million.

FIGURE 2-10. CUMULATIVE ECONOMIC BENEFITS TO PNM FROM PARTICIPATION IN THE WESTERN ENERGY IMBALANCE MARKET



The WEIM delivers cost savings through more efficient real-time dispatch across its footprint. These savings come from the following:

- Lower-cost wholesale energy trades between Balancing Areas that would not otherwise occur through manual bilateral trading
- Redispatch of resources to relieve transmission constraints across the system
- Improved reliability through automated market dispatch during local generation scarcity
- Greater opportunity to sell excess generation when PNM's resources produce more energy than customers consume in real time

While participation in the WEIM produces savings through more efficient operations, it has no direct effect on PNM's resource adequacy needs. WEIM participants must pass sufficiency tests before each operating hour, confirming they are not relying on other participants' capacity or flexibility. Entities that fail these tests are excluded from full market optimization until they qualify. In short, the WEIM helps ensure the most economic generation is dispatched intra-hour across a wide footprint, but it does not directly affect planning reserve margins or required capacity.

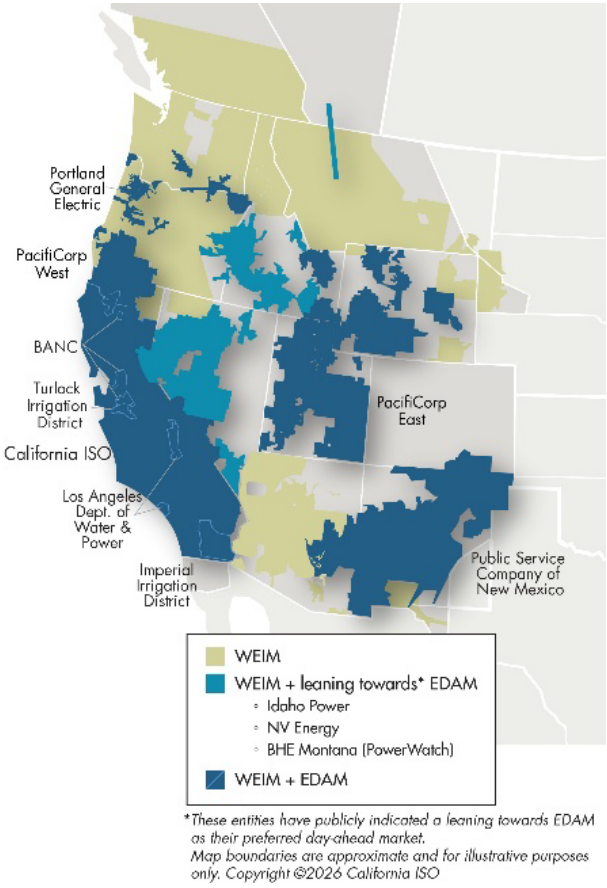
Extended Day-Ahead Market

The EDAM builds on the WEIM by expanding regional optimization into the day-ahead timeframe, when most power schedules and resource commitments are set for the following operating day. Where the WEIM optimizes dispatch in real time, the EDAM allows participating balancing areas to coordinate day-ahead unit commitment, scheduling, congestion management, and transmission use across a broader footprint before the operating day begins. The EDAM went live

on May 1, 2026, with PacifiCorp as the first participating entity, marking the West's first organized day-ahead market expansion under the CAISO framework.

Figure 2-11 shows the WEIM footprint and how expected EDAM participants will create more regional efficiencies by regional diversity.

FIGURE 2-11. WEIM AND EXPECTED EDAM PARTICIPATION[11]



PNM is preparing to join the EDAM in October 2027, extending the operational and customer benefits it has seen through the WEIM into the day-ahead timeframe. PNM evaluated day-ahead market options to determine which option would deliver the greatest customer benefit and best fit PNM's system. This evaluation included comparing the EDAM with Markets+, the day-ahead option being developed through the SPP. The analysis showed that the EDAM would provide the greatest customer benefit for PNM. Because most resources exported over the PNM transmission system are delivered to California, participating in a different day-ahead market footprint than those resources would have created added operational challenges and seams risk, reinforcing the case for the EDAM.

[11] "Extended Day-Ahead Market fact sheet". California ISO. Available at https://www.caiso.com/Documents/extended-day-ahead-market-edam-fact-sheet.pdf

Separate production cost analyses by E3 and The Brattle Group supported this conclusion and were presented during a public regional market workshop series the NMPRC convened in 2023 and 2024 as part of Docket No. 23-00268-UT. Workshop materials are available in the case docket at the NMPRC and on YouTube. Brattle's conservative estimate put PNM's annual customer benefit from EDAM participation at $20 million.

As with the WEIM, EDAM participants must meet resource sufficiency requirements by demonstrating enough supply, bid range, and imbalance reserves to meet expected load and operational needs before receiving the full benefits of market optimization. The EDAM does not change a utility's underlying obligation to arrive at the market with adequate capacity, nor does it alter planning reserve requirements. Over time, however, the pricing, congestion, and dispatch data the EDAM produces may help PNM better value portfolio options by revealing the market value of resource attributes, location, flexibility, and transmission deliverability.

Evolution of Pricing Dynamics

As the structures that govern western wholesale markets evolve, so too are the pricing dynamics observed within them. These shifts in pricing patterns, when and where wholesale energy is low-cost versus high-cost, reflect changing fundamentals of electricity system operations as the resource mix transitions away from baseload generation and toward higher penetrations of solar, wind, and battery storage. PNM monitors these trends for multiple reasons:

- As a wholesale market participant, PNM is directly impacted by pricing observed in wholesale markets, and changes to those pricing patterns will directly influence both new resource decisions and how resources are operated to maximize benefits for PNM's customers; and
- The pricing patterns observed in neighboring markets, and the underlying fundamentals of driving them, offer useful, real-world insight into how electricity systems with high penetrations of renewables and energy storage are likely to operate.

These two motivations are increasingly intertwined: as wholesale market structures evolve and organized markets take shape across the West, liquidity across markets is likely to increase, making dynamics in neighboring markets even more directly relevant to PNM's own market position.

Renewable Curtailment & Negative Pricing

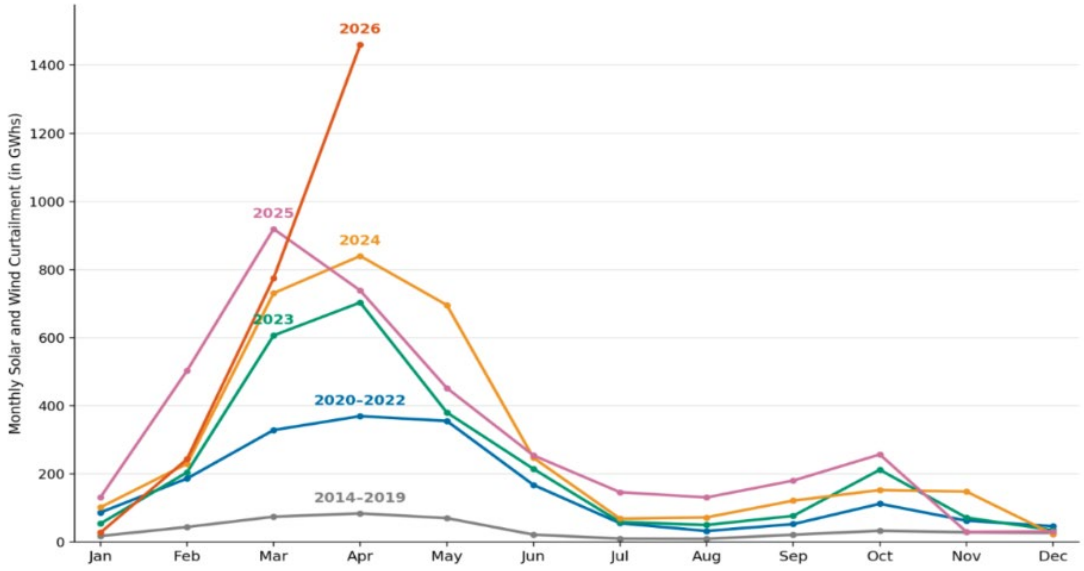
As PNM and other utilities throughout the West increase the penetration levels of solar and wind, there will be more hours of overgeneration when available renewable generation is greater than customer demand. To plan for periods of overgeneration, PNM has three primary options: sell the excess energy to neighboring regions, use it to charge storage resources, or curtail the renewable output.

PNM's participation in the WEIM and its planned participation in the EDAM are important tools for PNM to reduce its clean energy curtailment. These regional markets allow electricity to be more easily traded across balancing areas, allowing surplus renewable energy in one area to serve customers in another. Utilizing more renewable energy reduces the need to rely on fossil

generation which can be more costly and generate CO_2 emissions. CAISO estimates that over 258,000 MWh of renewable energy curtailment was avoided in 2025 due to the energy transfers facilitated by the WEIM, resulting in a reduction of approximately 110,500 tons of CO_2 across the WEIM footprint in 2025.[12]

Battery storage also provides a means for reducing renewable curtailment. Even with regional market participation and more storage, renewable curtailment on PNM's system is expected to rise as renewable penetration increases. As more solar and wind resources are added, generation output from these resources will continue to stack during the same hours, while demand will not grow equivalently in those same hours. The CAISO system reveals how renewable curtailment can increase over time as renewable penetration grows. As shown in Figure 2-12, curtailment on California's system has increased year over year, particularly during spring months when solar generation is abundant but electricity demand for air conditioning remains relatively low. While curtailment is high during shoulder months, high levels of renewables remain valuable during the summer season when more generation is needed to meet high electricity demands during the day and to charge battery storage to meet the evening peak. Similar curtailment patterns have been observed in other high renewable markets, and PNM expects similar trends to emerge on its system.

FIGURE 2-12. RENEWABLE CURTAILMENT IN CAISO[13]



[12] "Western Energy Imbalance Market Benefits Report: Fourth Quarter 2025." California ISO. Available at https://www.westernenergymarkets.com/documents/iso-western-energy-imbalance-market-benefits-report-q4-2025.pdf

[13] Davis, Lucas. "Visualizing California Renewable Curtailments". Energy Institute Blog. June 15, 2026. Available at https://energyathaas.wordpress.com/2026/06/15/visualizing-california-renewables-curtailments/

2.4.2 Regional Resource Adequacy Programs Development for EDAM

An effort is now underway to design a Regional Resource Adequacy program for EDAM participants. As of July 2026, public stakeholder processes have commenced and are intended to evaluate how resource adequacy obligations, forward showings, deliverability requirements, and market participation rules could be better aligned with the EDAM footprint. PNM is actively participating in the design and stakeholder processes.

The proposed EDAM-aligned resource adequacy program follows important groundwork established by WRAP. PNM participated in WRAP during its non-binding phase, which helped develop regional experience with forward showings, common resource counting concepts, and visibility into regional capacity positions. However, PNM elected to leave WRAP ahead of binding obligations (Q4 2025), along with other EDAM participants, because a long-term resource adequacy program is most effective when it aligns with the organized market footprint in which resources are scheduled, optimized, and delivered. Aligning resource adequacy with EDAM better supports consistency between planning requirements and the market platform that will manage day-ahead operations and transmission optimization.

The value proposition of a regional resource adequacy program is that it provides transparent visibility into whether the region is collectively procuring the types and amounts of resources needed to reliably serve load under stressed conditions. It also begins to align planning metrics and assumptions among neighboring utilities and load-serving entities, including how capacity is counted, how deliverability is demonstrated, and how uncertainty, outages, load risk, and resource performance are reflected. Common metrics can help instill trust among market participants by demonstrating that each entity is bringing sufficient resources to the regional market and is not relying on others to meet its own obligations. When regional adequacy is visible and transparent, entities should have greater confidence offering their full resource capability into energy markets, which can improve liquidity, reduce withholding concerns, support more efficient dispatch, and lower costs for customers.

Over time, a regional resource adequacy program could also create a stronger analytical foundation for evaluating planning reserve margins and resource investment needs. As regional data becomes more transparent, comparable, and statistically meaningful across a larger set of loads, resources, and weather conditions, utilities and regulators may be able to better assess the contribution of regional diversity, deliverability, and correlated risk to resource adequacy outcomes. That information could eventually support more refined estimates of required reserves and reduce unnecessary investment in duplicative capacity, while still preserving each utility's obligation to plan for and procure adequate resources for its customers.

PNM will continue to participate in these efforts and will continue to assess the value of its participation as well as monitor how those efforts may eventually affect the IRP planning process.

2.4.3 Interregional Transmission Planning Efforts

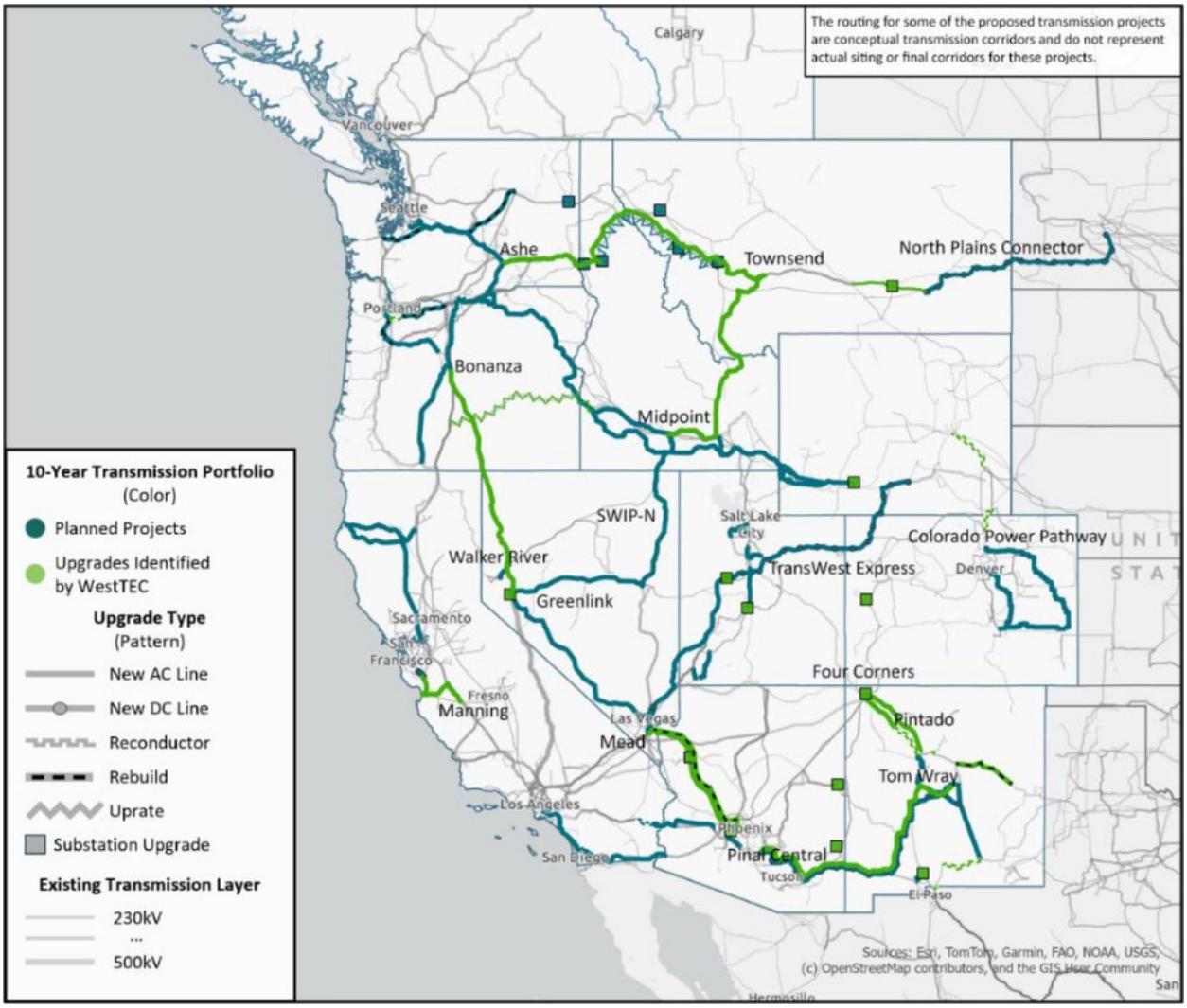
Stakeholder Input: Provide detailed information regarding regional transmission planning

During the 2023 IRP, stakeholders requested more information on regional transmission planning. This section discusses ongoing regional transmission efforts currently under study.

The Western Transmission Expansion Coalition's (WestTEC), a partnership of utilities, transmission providers, state agencies, system operators, public power entities, developers, tribal representatives, and other stakeholders, published a 10-year Horizon Study in 2026 that examined the need for new regional transmission projects to meet load growth and integrate renewable resources at scale across the West. The study identified a need for more than 12,600 miles of new or upgraded high-voltage transmission by 2035, including major interregional corridors designed to improve transfer capability between western subregions and reduce congestion on critical Western Electricity Coordinating Council (WECC) paths. Figure 2-13 summarizes the results of that planning effort, including both projects already under development and new conceptual projects identified by WestTEC.

PNM's IRP incorporated certain projects from the WestTEC study in its evaluation to further its understanding of the value of each of those projects to PNM customers. As noted in the Action Plan, PNM will continue to assess these projects to define benefits and pursue those if they provide demonstrated value to PNM customers.

FIGURE 2-13. SUMMARY OF WESTTEC 10-YEAR TRANSMISSION PLAN[14]



[14] Western Transmission Expansion Coalition. "West-Wide Transmission Study 10-Year Horizon Report." February 2026. Available at https://www.westernpowerpool.org/private-media/documents/WestTEC_10-year_Full_Report.pdf

3. Load Forecast

Chapter Highlights

1. PNM provides retail electric service to customers throughout the state of New Mexico; customers include residential, commercial, industrial, and other end users of electricity.
2. PNM adapts programs and services to meet customers' needs and preferences, which include energy-saving measures, a TOD pilot, a new transportation electrification program (TEP) plan, and a revamp of renewable energy programs.
3. PNM's peak demand exceeds 2,200 MW in 2026 and is expected to grow at an average rate of 2.5% per year over the 20-year IRP horizon. This forecast reflects current expectations for economic and demographic changes, economic development projects, behind-the-meter solar adoption, and electric vehicle adoption.
4. PNM's IRP includes multiple-load forecast scenarios. These futures and extreme load growth sensitivity consider the different levels of the variables described above as well as building electrification, TOD rate design, extreme weather events, and significant economic development.
5. In the highest load growth forecast included in the IRP, peak demand grows at a rate of 3.2% per year through 2045.

PNM's mission is to provide safe, reliable power to customers at affordable prices. Customer usage patterns and preferences inform resource planning and procurement decisions. As such, the portfolio analysis process in this IRP informs that the Statement of Need is designed to evolve in concert with customer needs and preferences over the coming years. This chapter describes PNM's customers and their energy usage, customer offerings through rates and programs, as well as the forecast for peak demand and energy use through 2045.

3.1 PNM Customers

PNM's retail service territory, shown in Figure 3-1, covers a large area of north central New Mexico, including the cities of Albuquerque, Rio Rancho, and Santa Fe as well as most of the area around the Rio Grande Valley from Belen to Santa Fe. Other communities in PNM's territory include Lordsburg, Silver City, Deming, Alamogordo, Ruidoso, Tularosa, Clayton, Las Vegas, several New Mexico Pueblo nations, and numerous unincorporated areas.

FIGURE 3-1: PNM SERVICE TERRITORY

PNM serves approximately 556,000 retail electric customers across a diverse range of residential, commercial, and industrial users. For the purpose of providing retail electric service, PNM organizes these customers into nine classes that reflect different sizes, applications, and patterns of consumption. PNM's classes of service are listed in Table 3-1, along with breakdowns of total customers, annual load, contribution to peak, and revenue from these classes.

TABLE 3-1. PNM'S 2025 CUSTOMER COUNTS, USAGE, AND REVENUE

Customer Class	Customers (#)	Annual Load (GWh)	Coincident Peak (MW)
Residential	496,948	3,758	953
Small Power	54,474	1,026	246
General Power	4,303	2,085	400
Large Power	156	926	130
Large Service	13	2537	303
Private Lights	0	13	0
Irrigation	314	25	5
Water and Sewer	149	200	16
Streetlights	1	40	0
Total	**556,358**	**10,610**	**2,053**

PNM customers' demand and energy usage vary based on geography, climate, customer type, and technology adoption. Accounting for these differences is important in the planning process to ensure that all customers receive the service they require.

3.2 Existing Demand-Side Programs

As enumerated in the IRP Rule, demand-side resources consist of two types: EE and load management (LM). EE refers to reductions in energy use by customers over the whole year, the timing of which is dependent on the measure. LM programs, such as DR, reduce customer demand specifically at times of peak load or during shortages of supply. This section describes the current EE and DR programs, along with historical program performance and program descriptions in compliance with the requirements of the IRP Rule, 17.7.3.8(B)(1) NMAC.

PNM's existing resource portfolio includes EE and DR programs approved by the NMPRC pursuant to the Efficient Use of Energy Act (EUEA). This portfolio is required to pass the Utility Cost Test, which compares portfolio costs to benefits. Benefits include avoided generation costs (e.g. fuel and emissions) along with avoided or deferred costs of capacity additions as well as avoided transmission and distribution costs. The EUEA requires utilities to invest no less than 5% of 2025 retail sales revenue in EE and LM programs by 2030. Annual NMPRC-approved budgets for EE and DR have grown over time, reaching $36.5 million in 2026.

3.2.1 Energy efficiency

PNM's EE programs offer a diverse set of opportunities to customers to save energy, reduce their electricity bills, and benefit the environment. The programs are designed to complement supply-side planning, to meet the requirements of the EUEA, and to facilitate transformation of the New Mexico economy to the public benefit. As described in the 2027-2029 EE and LM Program Plan:

Energy Efficiency

> In addition to meeting the requirements of the Act, PNM's EE programs encourage lasting structural and behavioral changes in the New Mexico economy through the process of market transformation. This is accomplished by promoting the purchase of energy efficient products and services, increasing customer awareness of EE measures, providing incentives to change behaviors, and removing market barriers. Over time, distributors will stock more efficient equipment, contractors will promote more efficient equipment to their customers, and customers will become more inclined to purchase efficient equipment.
>
> – 2027-2029 Energy Efficiency and Load Management Program Plan

PNM carefully tracks savings produced by its EE programs using the results from an annual measurement and verification process. The process is conducted by an independent third-party evaluator selected by the NMPRC and reports metrics including customer adoption rates as well as energy savings, carbon emissions reductions, and reductions in water use by generators that

is attributable to PNM's EE programs. Table 3-2 summarizes the results of the programs from 2008 through 2025. Since 2012, efficiency programs have consistently yielded incremental energy savings of 70 GWh per year or greater. Because these savings persist over time, the total impact of the efficiency programs on load is larger still: the cumulative load reduction in 2025 was 779 GWh, which resulted in nearly 3.98 million metric tons of avoided greenhouse gas emissions and over 2.3 billion gallons of water conserved.

The effects of these historical programs are captured directly in the load forecast. In forecasting load, programs are assumed to be replaced as they expire, so that demand and energy savings continue throughout the plan period. The load impacts of future EE programs are modeled explicitly in the IRP as a resource option; the characterization of this option is discussed in detail in Section 8.1.1.

TABLE 3-2. HISTORICAL STATISTICS FOR ENERGY EFFICIENCY PROGRAM IMPACTS[15]

Year	Incremental Energy Savings (GWh)	Cumulative Energy Savings (GWh)	Cumulative GHG Savings (000 tonnes)	Cumulative Water Savings (million gal)	Peak Demand Savings (MW)	Annual Program Cost ($ millions)
2016	82	583	1,543	876	13.0	$26
2017	75	622	1,881	1,080	11.9	$26
2018	71	653	2,235	1,270	12.5	$23
2019	78	672	2,557	1,466	13.7	$24
2020	87	702	2,911	1,648	15.0	$26
2021	107	730	3,255	1,838	18.8	$30
2022	96	750	3,570	1,987	13.9	$31
2023	92	767	3,767	2,103	14.5	$31
2024	86	775	3,889	2,226	18.0	$36
2025	87	779	3,982	2,332	18.0	$39

Compliance with EUEA Targets

The EUEA and subsequent amendments have established minimum energy savings goals for EE programs. Historically, the comprehensive EE programs have surpassed the minimum standards required by the EUEA:

[15] The cumulative energy efficiency savings represent the cumulative savings over the last 9 years which assumes EE programs have an average 9-year life. The emission savings demonstrate the savings that have resulted from the inception of the program.

- The original EUEA established a 2014 goal of 5% of PNM's 2005 retail sales, or 411 GWh; PNM exceeded this goal with 421 GWh of cumulative savings;
- Amendments in 2013 established a 2020 goal of 8% of 2005 retail sales, or 658 GWh, which PNM surpassed with 702 GWh of cumulative savings; and
- The amendment in 2019 established goals for 2021-2025 of 5% of 2020 retail sales, or approximately 395 GWh. PNM exceeded this cumulative goal by 74 GWh;
- The Commission established a 2030 goal of 5% of 2025 sales, to which PNM received a variance allowing PNM to use 2024 sales. This goal is 405 GWh.

PNM's plan to continue existing EE programs is documented in the 2027 EE and LM Program Plan, which establishes plans for 2027-2029 that are expected to produce approximately 99 GWh of incremental net savings each year. PNM expects an increase in annual program costs, as many of the supply chain disruptions that have affected other parts of the industry also have implications for program costs as well.

Program Cost Effectiveness

As specified by the EUEA, the EE programs must pass the Utility Cost Test at the portfolio level. This means that the benefits realized through avoided energy and capacity costs must exceed the costs to administer the program and provide incentives for customer adoption. Typically, the programs exceed a benefit-cost ratio of 1.0 by a significant margin: in 2025, for example, the benefit-cost ratio of the portfolio was 1.38.

Transmission & Distribution Avoided Cost Study

In Docket No. 23-00138-UT, Final Order, Paragraph 6 E, the Commission ordered that "PNM shall conduct a transmission and distribution avoided cost study to be included in its next EE and LM program plan for years 2027-2029, and if PNM chooses to propose proxy avoided costs, it shall update the values for those proxy costs to be current as of the year of filing". Rather than use another proxy value, as has been the case historically, PNM elected to use an independent, third-party company, Demand Side Analytics, with broad expertise in this area to perform the study.

This comprehensive study involved the analysis of inputs from areas throughout PNM primarily including, but not limited to, Integrated Resource Planning, Distribution and Transmission Planning, System Mapping, Load Forecasting, Energy Efficiency, Community Solar, Transportation Electrification, and Economic Development. The historical and forecast data from these multiple sources included data from traditional household meters, commercial metering (MV90 and Advanced Metering), and substation and feeder SCADA data. Demand Side Analytics performed the T&D avoided cost study with input from all relevant PNM subject matter experts. The results from the T&D avoided cost study[16], on balance, will increase cost-effectiveness

[16] "Avoided Cost of Transmission and Distribution Capacity Study." Demand Side Analytics. March 2026. Available at https://www.pnm.com/documents/d/pnm.com/pnm-avoided-t-d-study-final-pdf

relative to the proxy avoided costs. The T&D avoided cost study results will apply to 2026 and later.

Overview of Programs

PNM's energy efficiency programs include the following incentives:

- Retailer rebates for the purchase of energy efficient products such as insulating spray foam, air purifiers, and evaporative coolers;
- Rebates for recycling older refrigerators;
- Residential incentives for efficient appliances and cooling equipment;
- Rebates to small and large commercial customers for efficient lighting and heating, ventilating, air conditioning and other energy efficiency improvements tailored to customers' businesses;
- Incentives for homebuilders to construct homes that go beyond existing energy codes;
- Energy behavioral program where residential and commercial customers receive personalized energy-saving tips and rebate recommendations;
- Energy saving kits provided to fifth-grade students, high school students, and seniors along with an interactive instructional presentation on energy efficiency; and
- Incentives that specifically target energy efficiency improvements for income-qualified and multifamily customers.

PNM promotes EE programs and efficient energy-use incentives through bill inserts, direct mail and email advertising, radio, television, print advertising, social media and other digital advertising, and community education programs. The PNM website also provides information on these programs.

Once approved by the NMPRC, EE programs remain in effect until modified or canceled by the NMPRC. Descriptions of the specific programs offered can be found in PNM's 2027 Energy Efficiency and Load Management program plan[17]. How PNM modeled these programs in this IRP and the detailed modeling information and assumptions are provided in Appendix E.

3.2.2 Demand Response

Demand response programs reduce customer demand at times of peak load or during shortages of supply. PNM customers can opt to have portions of their load curtailed through the Peak Saver and Power Saver programs:

[17] "2027 Energy Efficiency and Load Management program plan." PNM. April 2026. Available at https://www.pnm.com/documents/d/pnm.com/3_2027-ee-program-plan

- The Peak Saver load management program is designed to help medium and large commercial customers with individual or aggregated demand greater than 150 kW and reduce the amount of energy they require during peak demand periods.
- The Power Saver load management program sends control signals to refrigerated air conditioning units in participating homes and small businesses during periods of peak demand. To facilitate load control, participants must have a Digital Control Unit attached to the exterior of their air conditioning unit. This paging device can receive a radio signal that will activate a control sequence that cycles the unit's compressor for an interval of time (usually half the time as normal) to reduce peak demand in the summer. Alternatively, load curtailment can be achieved via communication with a participating Wi-Fi-enabled thermostat that requests a three-degree increase from the cooling unit. Participants can opt out of up to three control events per season without forfeiting their annual incentive and can request complete withdrawal from the program and incentive award at any time.

These programs were approved by the NMPRC in Docket No. 07-00053-UT and reauthorized in Docket No. 23-00138-UT. PNM selected the DR program contractor through a competitive bid process. Power Saver operates from June to September to help PNM manage peak summer loads. Participants' load may be curtailed up to 100 hours over the course of the control season, with a maximum duration of four hours at any given time. Peak Saver operates year-round with a maximum curtailable load of 100 hours during control season (June through September) and 300 hours during off-peak season (October through May), also with a maximum event duration of four hours. Customers receive a minimum of 10 minutes notice for each curtailment event, though notice is typically provided farther in advance. Power Saver curtailments can be called on week days, weekend days or on NERC holidays from 12pm to 9pm. Peak Saver curtailment events can be called year-round, 24 hours per day at reduced capacity levels outside of peak load periods (peak load periods are June through September, non-holiday weekdays, 10 am through 9 pm MT). Historically, the actual number of calls in a year has typically been between five and fifteen, though since 2019 the average has been three calls per year.

Historical Load Impacts

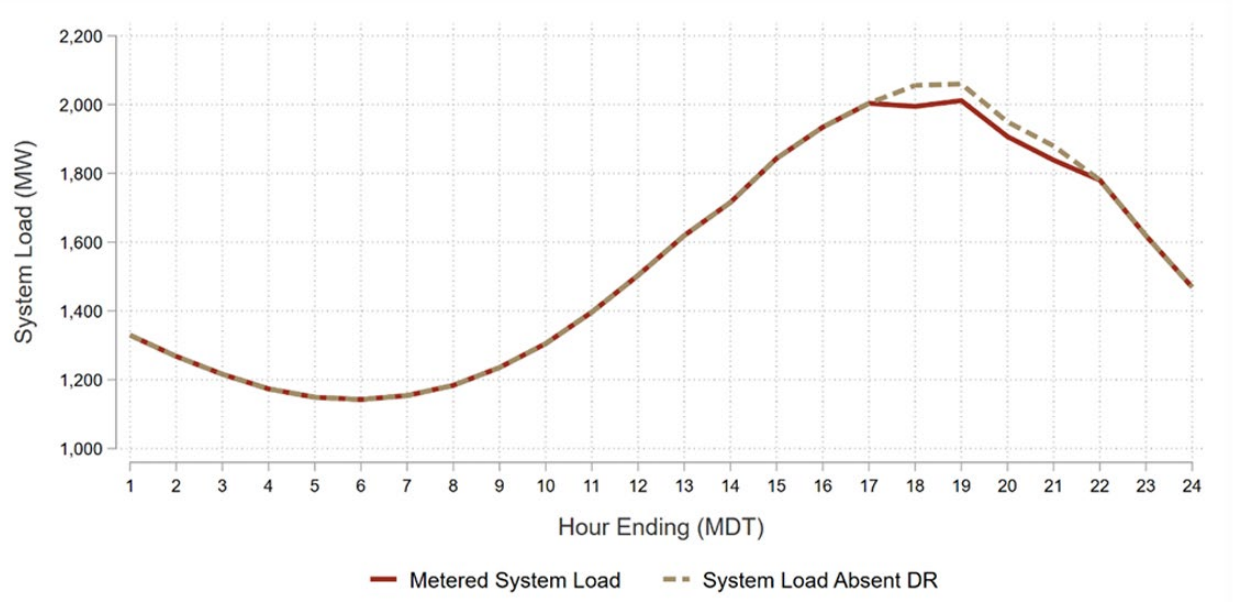
PNM relies upon the same measurement and verification process used for EE to evaluate the impacts of DR programs. In the most recent independent evaluation, EcoMetric Consulting notes the impact these programs had on PNM's peak demand:

> *"The Evaluation team concludes that PNM's load management programs served as a capacity resource that avoided the need for additional supply-side peaking capacity in 2025. While the summer of 2025 had fewer extremely hot days compared to prior years, gross demand was still high overall."*
>
> *– EcoMetric Consulting, Evaluation of the 2025 Public Service Company of New Mexico Energy Efficiency and Demand Response Programs*

The same independent review found that together the Power Saver and Peak Saver programs together are able to reduce peak demand by an average of 48 MW (see Figure 3-2). Data from 2024 is used to illustrate this point because only test events were called in 2025. Test events are meant to confirm that program implementation works as intended. Not calling events in a

particular year does not diminish the capacity of the resource but simply indicates that the resource was not needed that year due to variations in weather and other system factors.

FIGURE 3-2. PNM SYSTEM LOAD ON JULY 31, 2024[18]



The Peak Saver and Power Saver programs are governed by a contract covering up to 9 years, with optional three-year extensions at two points within that timeframe, contingent upon regulatory approval. This contract went into effect in 2024.

3.2.3 VOLUNTARY GREEN ENERGY PROGRAMS

PNM conducts regular customer surveys on a variety of topics to better understand customer priorities and identify opportunities to enhance service offerings. In a recent survey, approximately 30% of respondents indicated they were “very interested” in participating in a voluntary renewable energy program, and 85% reported being at least “somewhat interested”. These results demonstrate strong customer interest in renewable energy options and suggest that many customers are willing to consider programs that help reduce their environmental impact.

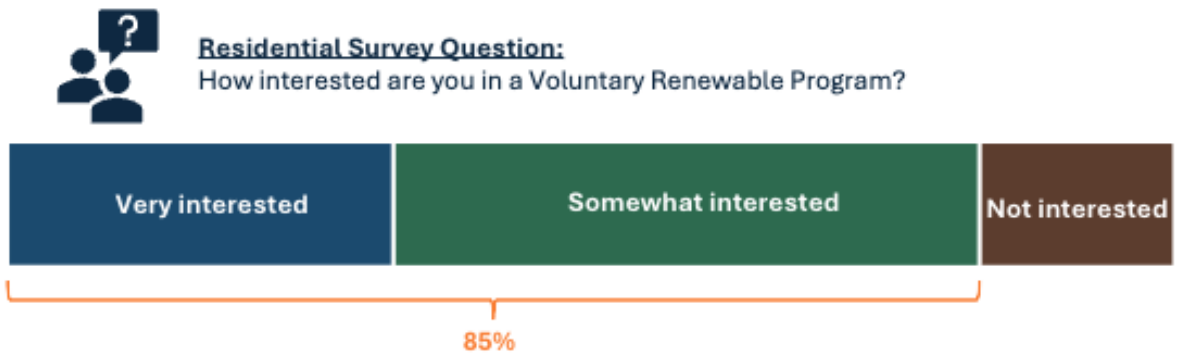
For customers seeking a higher level of renewable energy than that is reflected in PNM’s generation portfolio, PNM offers net metering and several voluntary programs, including PNM Solar Direct, Community Solar, and PNM Sky Blue. These programs allow customers of all sizes to invest in their own on-site generation, or to procure renewable energy from utility scale resources. Because participation in these programs is voluntary and separate from PNM’s standard service, the renewable energy resources dedicated to serving these customers are not

[18] Figure reproduced from: “2025 Evaluation of Energy Efficiency and Load Management Programs”, April 2026, Available at https://www.pnm.com/documents/d/pnm.com/2_evaluation-of-2025-pnm-ee_load-mgmt-prgrams

included in PNM's RPS accounting. This means that the actual fraction of renewable energy produced to serve PNM customers will always be larger than the fraction reported for RPS compliance. Participation in these programs is expected to continue growing, leading to a percentage of renewable generation higher than what is required by the RPS.

Utility-led renewable energy programs provide an opportunity to meet customers' desire to tailor their energy use. Coordination between the IRP process and program design will remain important, particularly as PNM's portfolio shifts to renewable resources supplying the majority of customers' energy use. Understanding the system impacts from increased adoption of resources not counted in the RPS, privately owned resources and utility scale resources supplying voluntary programs, informs program and generation portfolio design.

FIGURE 3-3. RESIDENTIAL CUSTOMER INTEREST IN VOLUNTARY GREEN ENERGY PROGRAMS



PNM Solar Direct

PNM has also been working collaboratively with larger customers to provide increased choice in energy supply. In Docket No. 19-00158-UT, under a program approved by the NMPRC in 2020, customers with loads larger than 2.5 MW are eligible to subscribe to a portion of the output of the 50 MW Jicarilla 2 solar plant in Rio Arriba County. This program allows large customers the option to meet their sustainability goals through a fifteen-year commitment to purchase output from this facility. Jicarilla 2 is fully subscribed by nine large and governmental customers. The site was fully commissioned in April 2022, and customers receive a bill credit for their subscription each month.

Community Solar

The Community Solar program is authorized by the Community Solar Act, SB 84, that was signed by Governor Michelle Lujan Grisham in April 2021 and became effective on June 18, 2021. It is codified as NMSA 1978, Sections 62-16B-1 to -8. Commission Rule 573 (17.9.573 NMAC) implements the Community Solar Act. It is a way for customers who may not be able to install their own behind-the-meter solar system to participate in a community solar project by subscribing

to a percentage of the output of a specific community solar facility. In return, the customer receives a monthly bill credit ($/kWh) specific to their rate schedule for their subscription amount.[19]

Phase 1 of Community Solar authorized a statewide capacity of 200 MW_{AC}, of which PNM's share is 125 MW. In November 2024, the NMPRC increased the statewide cap and allocated an additional 185 MW to PNM, for a total of 310 MW to be interconnected. This total does not include tribal community solar projects, which are not subject to the cap. Phase II capacity has not yet been released for bids, but is expected soon now that amendments to Rule 573 as a result of Docket No. 24-00258-UT are nearing completion.

Selected community solar sites must be within PNM's service territory and connected to PNM's distribution system. The first community solar site came online in September 2025 and bill credits were subsequently issued to subscribing customers. As of May 2026, there are six community solar sites accounting for 30 MW of solar capacity. There are approximately 7,100 customers subscribing to community solar projects for almost 5 GWh of subscribed energy.

PNM Sky Blue

PNM Sky Blue in its current state was a voluntary green tariff program that was offered starting in 2013 to PNM customers who were willing to pay a premium through Rider 30 to upgrade more of their energy consumption to renewables. These customers could subscribe to PNM Sky Blue by purchasing blocks in 100 kWh increments or a percentage of their overall consumption; a mix of both wind and solar resources were dedicated to PNM Sky Blue subscriptions. Solar energy was sourced from 1.5 MW of the Manzano Solar Energy Center (8 MW total) and wind was sourced from the New Mexico Wind Energy Center (NMWEC).[20] PNM Sky Blue was used by some commercial customers to meet their green goals and by residential customers who were interested in solar but didn't have their own distributed generation systems. However, by early 2025 subscriptions were declining overall. For various reasons commercial customers do not have the same green energy goals compared to several years ago and they often install their own behind-the-meter solar. Residential net metering has increased, which has impacted Sky Blue participation. Given the decline in customer numbers overall, PNM explored the idea of redesigning PNM Sky Blue into a voluntary green tariff program that would be more responsive to today's customer needs. There was limited interest when PNM held exploratory workshops and for residential customers now, Community Solar is an effective alternative for those who want to purchase a share of a community solar project. As a result, in Q4-2025, PNM filed an application with the Commission seeking approval to terminate PNM Sky Blue, Docket No. 25-00071-UT. There was one protest from a commercial customer. PNM worked with that customer and both parties agreed on a continuation of Sky Blue through December 31, 2026. Sky Blue will terminate shortly thereafter.

[19] The monthly bill credit is comprised of the Fixed Community Solar Program Credit (base rate components less commission-approved distribution cost components) plus the fuel clause rate plus the renewable energy rider rate.
[20] Sky Blue prior to 2013 was sourced entirely from NMWEC.

3.2.4 RFP for DSM Resources

The following directive was ordered in Docket No. 23-00138-UT. Below is a description of PNM's compliance with the directive.

> *PNM shall fulfill the requirements of the final order in Docket No. 20-00218-UT by including in, or issuing contemporaneously with, its request for proposals to be issued in accordance with 17.7.3.12 NMAC following acceptance of its 2023 integrated resource plan, a solicitation for new, incremental demand response resources based on all available utility demand response resources.*

PNM issued its RFP for DSM resources on September 4, 2024. DSM resources were defined to include traditional DR resources, EE programs, or other resources as may be proposed. Offers for capacity from DSM resources would be considered if they provided system capacity reductions that: (i) mitigated reliability risks throughout the year, as discussed in PNM's latest IRP or (ii) offered availability to provide other benefits to PNM's system such as load shifting, load smoothing, or avoidance of generating unit starts.

Prior to issuance of the RFP for bid, on July 10, 2024, PNM served a draft of the RFP documents to the RFP Independent Monitor (IM), the NMPRC Commissioners and their assistants, and all parties to the utility's pending IRP case for review and comment. The IM subsequently issued its RFP design report on August 7, 2024, outlining comments and suggestions to the RFP. Comments were also received from Western Resource Advocates, Southwest Energy Efficiency Project, the Coalition for Clean Affordable Energy, Commissioners O'Connell and Ellison.

In total, PNM received 29 comments from the IM and RFP stakeholders. PNM made several modifications to the RFP to address these comments and issued responses to each comment in conjunction with the issuance of the RFP for bid on September 4, 2024.

Only one proposal was received on the Proposal due date of December 3, 2024. This Proposal failed to pass the RFP minimum requirements outlined in the RFP documents. Based on non-compliance and other factors including high cost, limited RFP responses, and a lack of competitive bids to evaluate and compare, a compliance filing was made to the NMPRC on January 29, 2025, detailing the decision for "No Award".

PNM received feedback from three suppliers as to why suppliers decided not to respond. One supplier stated the difficulty of pricing a solution for the start date of 2027 and beyond was too difficult to offer a compliant proposal. Other suppliers noted they did not have the ability to provide the solution requested or could only propose wholly different and proprietary technologies in lieu of a proposal submission. PNM filed its "2024 Demand Side Management Program RFP Results Summary" with the NMPRC on January 29, 2025. The IM, Merrimack, submitted its "2024 Demand Side Management Program RFP IM Final Report" with the NMPRC on February 11, 2025.

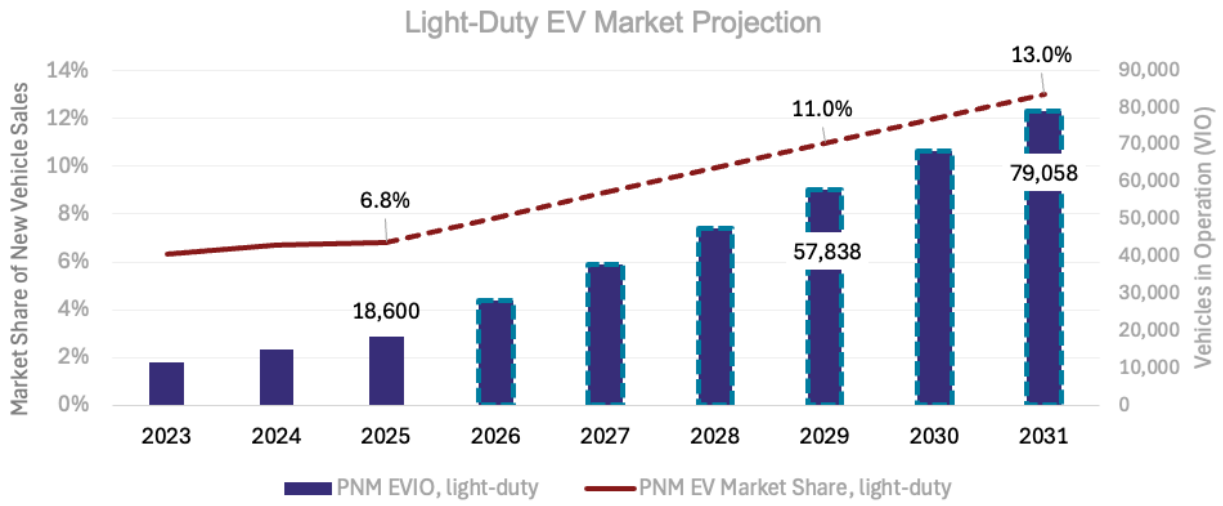
3.3 Trends in Usage and Customer Preferences

3.3.1 Electrification

In the past several years, PNM has observed a rapid acceleration in interest in EVs. Figure 3-4 shows this recent rapid increase: for most of the past decade, the share of new vehicles that were fully or partially electric was less than 1%, but in the past few years that share has grown significantly. At the end of 2025, nearly 7% of new vehicles sold in PNM's service territory were electric vehicles.

As the number of EVs on the road grows, their impact on the grid will continue to increase. The IRP incorporates a forward-looking projection of EV adoption into the demand forecast (discussed in Section 3.4.3), but PNM also recognizes the importance of being a proactive partner to customers as their preferences change. To that effect, PNM filed its 2027-2029 Transportation Electrification Program Plan, which is currently under consideration by the NMPRC, in May 2026 (Docket No. 26-0000115). The plan provides incentives for EVs and EV charging infrastructure, along with new rate plans to encourage customers to charge during off-peak times. Additionally, 40% of the funding is dedicated to supporting transportation electrification for low-income customers and those living in underserved areas.

Figure 3-4. Historical and Projected Sales Share of Electric Vehicles in PNM's Service Territory



PNM expects its plan to provide both financial and environmental benefits for customers. EV adoption can enable customers to manage electric loads by choosing when they charge EVs. By charging during off-peak times, customers can lower electric rates by shifting load away from the hours of highest demand in a manner that provides benefits to all PNM customers. Customers will also benefit from reduced spending and air pollution by displacing gasoline with EVs powered by an increasingly cleaner grid.

In the future, New Mexico's continued pursuit of economy-wide decarbonization will likely drive additional electrification – not only of transportation, but of buildings as well. While only 25% of residential customers report heating their homes with electricity today, proliferation of heat

pumps is expected to make electricity the primary heating fuel in the state. The same is true for water heating, where 23% of customers report electricity as their energy choice today.

The load growth from electrification presents an opportunity. With proper planning, significant segments of these new loads can be shaped to some extent to serve as a peak-reducing resource using a combination of rate signals and automatic controls. On the customer side, this management and the grid modernization technologies that enable it will improve the ability to communicate with customers and will lead customers to better engage with and understand their energy usage. On the system side, this management will lead to a more reliable and less costly system.

While PNM is beginning to incorporate electrification-driven increases in load in long-term planning, its forecasts under the CTP future do not include significant impacts from electrification within the timeframe of the planning period of this IRP. However, considering the continued push at a state level on economy-wide decarbonization, the fossil fuel market volatility, as well as requests from stakeholders, PNM analyzed a HEG future with increased EV penetration to help better identify the implications and potential actions needed for accelerated electrification.

3.3.2 Time Varying Rates

Almost all of PNM's customer classes currently have two time-varying rate options on their Time-of-Use (TOU) rate schedule as of May 15, 2026.[21] These two time-varying rate options are a Time-of-Use Rate and a Time-of-Day Rate Pilot (TOD pilot). They have different peak period structures and different energy rates, although the other rate components (customer charge and demand charge, if applicable) are the same for the duration of the TOD pilot. For the large customer classes (with demand greater than 50 kW), the TOU/TOD rate options are required. The Residential, Small Power, and Irrigation customer classes have a non-TOU/TOD rate schedule on which the majority of each customer class takes service.[22]

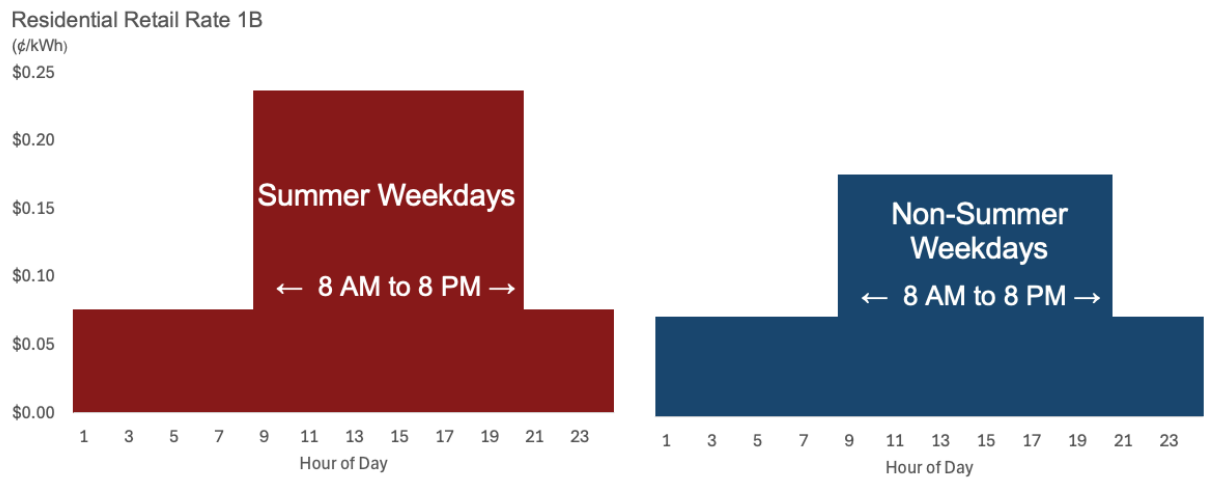
The exceptions to the time-varying rates are: (i) PNM's two lighting rate schedules (Rate 6 Private Area Lighting Service and Rate 20 Integrated System Streetlighting and Floodlighting Service) and, (ii) Rate 36B Special Service Rate - Renewable Energy Resources. The former do not have any time-varying rate schedules because lights are programmed to turn on at dusk and turn off at dawn, thus lack the capability to shift away from peak hours. The latter has only the Time-of-Use Rate with the associated on-peak hours. The specifics of each time-varying rate option will be discussed subsequently.

[21] The rate schedules that end in the letter 'B' are titled "Time-of-Use Rate," however have both the TOU Legacy and TOD pilot rate options on the rate schedule. For instance, Rate Schedule 3B General Power Service – Time-of-Use Rate has two rate options: Time-of-Use ("TOU") Rate and Time-of-Day ("TOD") Rate Pilot. This naming convention can cause confusion, so it is best to refer to TOU Legacy and TOD pilot for easier distinction.
[22] These rate schedules are Rate 1A Residential, Rate 2A Small Power, and Rate 10A Irrigation.

Time-of-Use Legacy Rates

PNM first offered its TOU Legacy rates in the early 1980s when the system peak was around 4:00pm and there was limited, if any, solar generation. The on-peak periods were set at 8:00am – 8:00pm, Monday-Friday, year-round. The goal was to encourage shifting or reducing consumption around the time of the system peak. PNM has seasonal rates and the summer on-peak energy rates are more expensive than the non-summer on-peak energy rates, while the off-peak rates are the same year-round. Figure 3-5 shows the on-peak hours for Residential customers on Rate Schedule 1B Time-of-Use Legacy Rate option, however the on-peak periods are the same for all of PNM's customer classes.

FIGURE 3-5. TOU LEGACY ON-PEAK HOURS FOR RESIDENTIAL (AND COMMERCIAL) CUSTOMERS



In the past decade, solar generation has been installed in greater numbers, leading to the need for less traditional generation during the day as well as excess solar generation being exported to the grid. This has led to the famous duck curve load and has also pushed the peak load hour later in the day when residential customers come home and begin their evening activities while solar production is decreasing so load would naturally ramp up anyways. It has been revealed that the TOU Legacy rate design is somewhat antiquated with its most expensive, on-peak hours overlaying the hours of inexpensive excess solar generation being exported to the grid. As a result, PNM began working on a new TOU rate design with its stakeholders in 2018 following the Final Order in the 2016 general rate case. This new TOU rate design was named "TOD" to distinguish it from the TOU Legacy rate. The TOD was proposed and approved as an opt-in pilot rate option for every customer class in the 2022 general rate case (Docket No. 22-00270-UT). The effective date was January 15, 2024. All of the TOU Legacy rate options remained open for customers. For Residential and Small Power customers, their TOU Legacy rate options were closed to new customers although existing customers could stay on the TOU Legacy rate option. In a future rate case, PNM plans to close Residential and Small Power TOU Legacy Rate options and move the existing customers to the TOD Pilot rate option with the option to switch to their non-time varying rate schedule 1A or 2A.

Time-of-Day Pilot Rates

As mentioned previously, TOD pilot rate design and rates were approved in Docket No. 22-00270-UT, becoming effective on January 15, 2024. The first customers started taking service on the pilot rates on February 15, 2024 (1 residential and 2 commercial customers). The TOD pilot is opt-in, so customers must choose to take service on the pilot rates.

The on-peak period hours were selected so that the price signal would effectively communicate when energy is more expensive for the utility as well as reflecting the impact of increased solar interconnections. The on-peak hours vary by season and there is a super off-peak period for the commercial customers.

Residential customers have a 2-period TOD pilot rate design. The summer on-peak hours are 5:00 pm - 8:00 pm Monday-Friday in June, July, and August.[23] All other hours, weekends, and the 4th of July are off-peak. The residential TOD pilot does not currently have a super off-peak period.

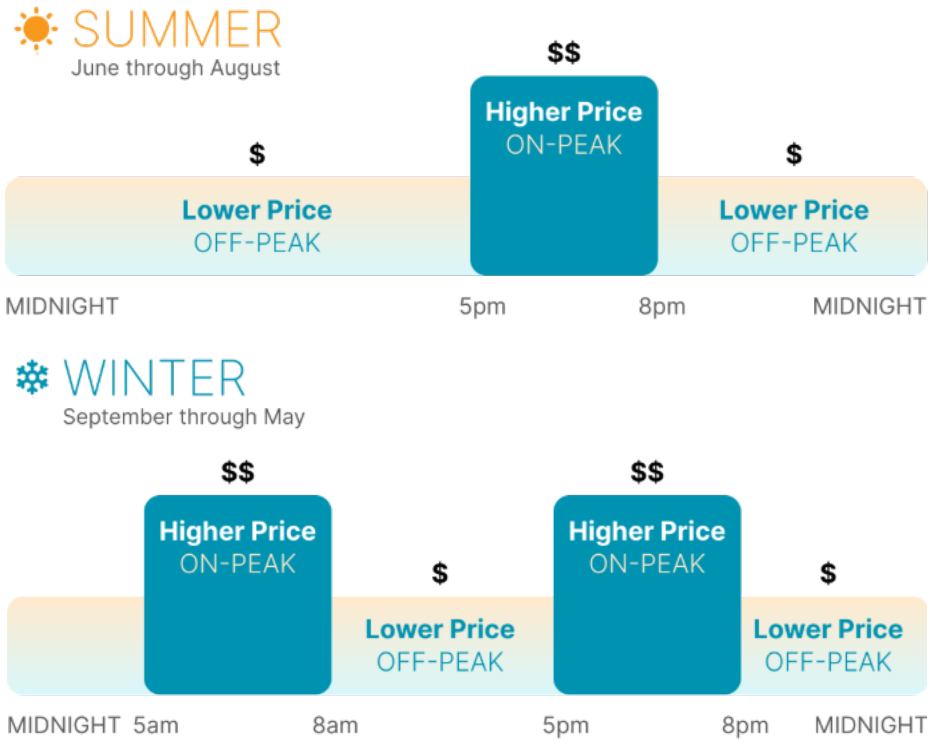
Commercial customers have a 3-period TOD pilot rate design. In the summer months, on-peak hours are 5:00pm to 10:00pm and super off-peak hours are 8:00am to 5:00pm Monday through Friday. All other hours, weekends, and the 4th of July are off-peak.

All customer classes have the same winter on-peak hours, which are 5:00am to 8:00am and 5:00pm to 8:00pm Monday through Friday September through May. All other hours, weekends, and other major holidays are off peak. Commercial customers have the super off-peak period in the winter months as well, 8:00am to 5:00pm Monday through Friday.

Figure 3-6 and Figure 3-7 show the summer and winter peak hours for residential and commercial customers, respectively.

[23] This is only 15 hours per week as compared to the 60 hours per week under the TOU Legacy rate design.

FIGURE 3-6. RESIDENTIAL TOD PILOT SEASONAL ON-PEAK HOURS, MONDAY-FRIDAY



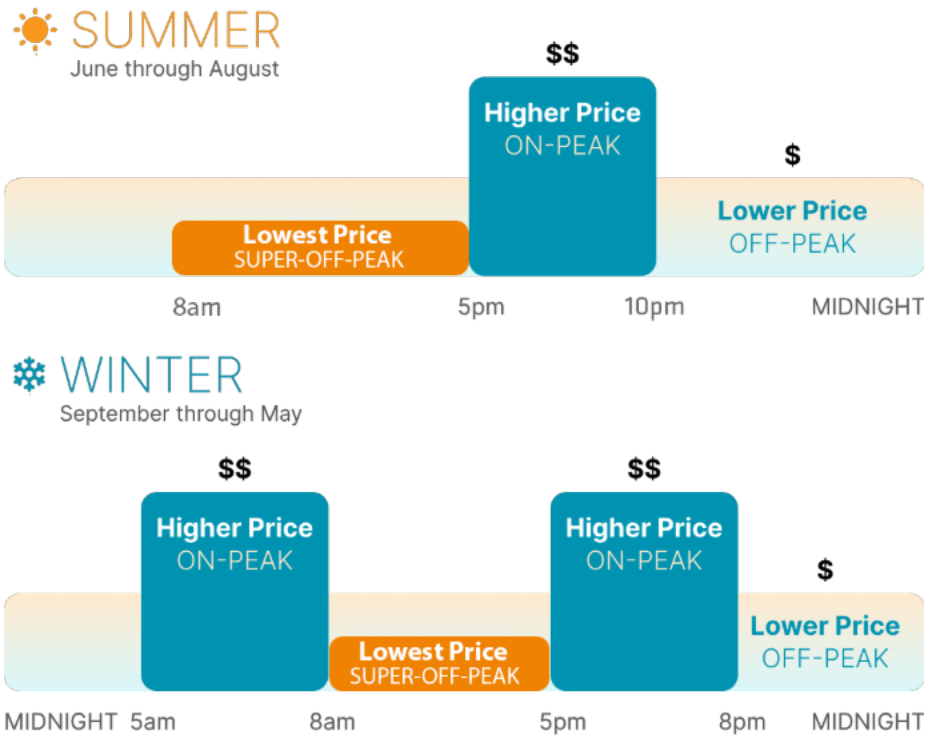
When the TOD pilot was proposed in the 2022 rate case, PNM did not propose a super-off-peak period for the residential TOD pilot because it was seen as too confusing. The residential customer class had almost no experience with time-varying rates and a 3-period rate design might have deterred customers from opting in. However, PNM plans on modifying the residential TOD pilot to include the super off-peak period in a future general rate case. As of March 2026, there were approximately 2,170 residential customers taking part in the TOD pilot.

PNM's independent evaluator provides annual reports on customer satisfaction and load shifting impact that are filed with the Commission as part of the Grid Mod Annual Review filing. The 2025 load impact analysis showed that there is a statistically significant summer on-peak reduction of approximately 9% during the on-peak hours of 5:00 pm to 8:00 pm. The non-summer on-peak hours have morning on-peak hours, 5:00 am to 8:00 am, and evening on-peak hours, 5:00 pm to 8:00 pm. The morning on-peak saw no reduction or shifting of usage, while the non-summer evening on-peak saw a reduction of approximately 5%, although it was not significant.

AMI deployment will begin in 2027. Once AMI is fully deployed to all PNM customers, PNM will propose default TOD rates for the residential rate class in a subsequent general rate case, which is expected to be effective in 2030. Default TOD means that PNM would move all residential customers on to the TOD rate. Residential customers would retain the right to opt-out and return to Rate 1A although PNM plans to revise 1A into a seasonal flat energy rate and not the current inclining block energy rate design that is currently in effect. PNM has observed in the current

residential TOD pilot, an opt-out rate of approximately 4% - 5%.[24] This may be low since the TOD pilot participants are currently characterized as early adopters, so maybe a more conservative opt-out rate would be around 10%.

FIGURE 3-7. COMMERCIAL TOD PILOT SEASONAL ON-PEAK HOURS, MONDAY-FRIDAY



In the first 18 months of the TOD pilot, commercial customers who switched to the TOD pilot rate option on their rate schedule largely had business operations that were compatible with TOD on-peak and super off-peak periods. School districts, small restaurants that served breakfast/lunch shifts, and single shift manufacturing are examples of early signups. In the past six months, several large box stores and water/sewage customers have either shifted all their stores or have notified PNM of their intent to move their accounts to their applicable TOD pilot rate. The lesson is that commercial customers need more time to assess how they might change business operations to take advantage of the TOD pilot rates.

3.3.3 ELECTRIC VEHICLE CHARGING RATES

In 2020 PNM filed its first Transportation Electrification Program (TEP) plan (Docket No. 20-00237-UT). As a part of the first TEP plan, PNM proposed two EV charging rate pilots, one residential and one commercial, to support the statutory goals of increasing EV adoption throughout PNM service territory.

[24] PNM defines the opt-out rate for the TOD pilot as customers who leave the TOD pilot rate to return to their original rate. There are other reasons that customers, such as switching to take service on the WHEV pilot rate.

Whole House Electric Vehicle (WHEV) pilot, residential EV charging

The residential EV charging pilot rate was called the Whole House EV pilot rate and it was a rate option offered on Rate Schedule 1A Residential Service. For qualified EV owners, the rate design offered a very low $/kWh rate to the entire house's consumption between the hours of 10:00pm and 5:00am to encourage overnight consumption. Energy consumption between 5:00am and 10:00pm was assessed as the inclining block energy charges on Rate 1A. There are around 4,625 residential EV customers taking service on the WHEV pilot rate as of May 2026. This rate is a pilot due to customer participation limits. Ultimately, the WHEV rate will be closed around 2030 after the Residential TOD pilot has been modified to include the super-off-peak period and TOD rates are the default for residential customers. The super-off-peak period will offer a low-cost energy rate to encourage EV charging during the day when solar generation is abundant.

Rate 3F Commercial Charging Stations pilot, commercial EV charging

The commercial EV charging pilot Rate 3F is for separately metered commercial charging stations. It has seasonal on-peak hours, 5:00pm to 10:00pm everyday June through August and 5:00am to 8:00am and 5:00pm to 8:00pm everyday September through May. All other hours are off-peak. There are 16 commercial charging stations taking service on Rate 3F as of May 2026. Rate 3F is considered a pilot because it is currently an energy-only rate with no demand charge. This is because research has shown that in rural areas without much EV traffic, a single EV charge during on-peak hours can cause the demand to spike so that the demand charge becomes 80% to 90% of the monthly bill, which reduces the incentive for private charging companies to operate charging stations in rural locations. Once there is sufficient EV adoption throughout PNM's service territory, then PNM plans to introduce a demand charge to Rate 3F.

3.4 Future Demand Forecast

Load forecasting is a fundamental component of resource planning. Loads growth will impact the timing and amount of generation additions and retirements, as well as the transmission and distribution infrastructure needed to deliver energy. Further, the load forecast is arguably the most critical piece in scenario planning, which helps to explore possible future conditions.

The load forecast and associated sensitivities are essential inputs to the IRP, especially in times of more volatile loads. Over the past half century, PNM's electric loads have undergone several dramatic shifts that directly shaped the electric system as it exists today. Loads grew rapidly and steadily post-World War II as Sunbelt regions like New Mexico experienced major growth. In addition, New Mexico experienced a huge investment in defense infrastructure with national laboratories and military bases. This unprecedented increase in the need for electricity brought forth the construction of large baseload plants like FCPP, SJGS, and PVNGS. Later, PNM was affected by the rise and fall of uranium mining in New Mexico. The industry was the largest customer group in terms of energy, either directly buying energy from PNM, or through supply contracts with electric cooperatives serving the mines. Gearing up to serve that load and then dealing with its collapse in the 1980s following the events of Three-Mile Island had huge implications for PNM's resource planning.

Presently, PNM faces the potential for another period of transformative changes in electricity demand. Recent load increases, particularly those driven by large industrial loads, and data centers, are notable examples. Moreover, policy directions for greenhouse gas emissions reduction increasingly emphasize the electrification of the economy; therefore, PNM anticipates further impact to utility service demand as transportation, space heating, and other energy sectors potentially transition to electric solutions.

3.4.1 Methodology

To create the load forecasts, PNM develops rate-level projections for residential, small power, and general power classes, including per customer usage and the number of customers in each class. For large power customers, individual forecasts are prepared due to their significant loads. These forecasts rely on historical load data, incorporating temperature and solar profiles from multiple locations within the service territory. PNM also adjusts load data to exclude the impact of behind-the-meter generation and normalize it with historical weather metrics.

Statistically adjusted, end-use models are used to predict future loads, accounting for factors such as economic growth, appliance saturation, EE, and the adoption of new technologies like EV, behind-the-meter (BTM) solar, and heat pumps. The load forecast also reflects the cumulative effect of prior years' EE programs. As PNM addresses the effects of climate change, climate-adjusted weather years are integrated into the load forecast to consider extreme temperature impacts on heating and cooling loads, which significantly contribute to customers' total demand. Finally, customer-level load is grossed up to account for losses in the distribution and transmission systems between the point of generation and the point of delivery. This analysis allows PNM to evaluate whether a resource is located on the supply or demand side of the customer meter and to assess its value to the system.

Three adjustments are applied to the initial results of these forecasts:

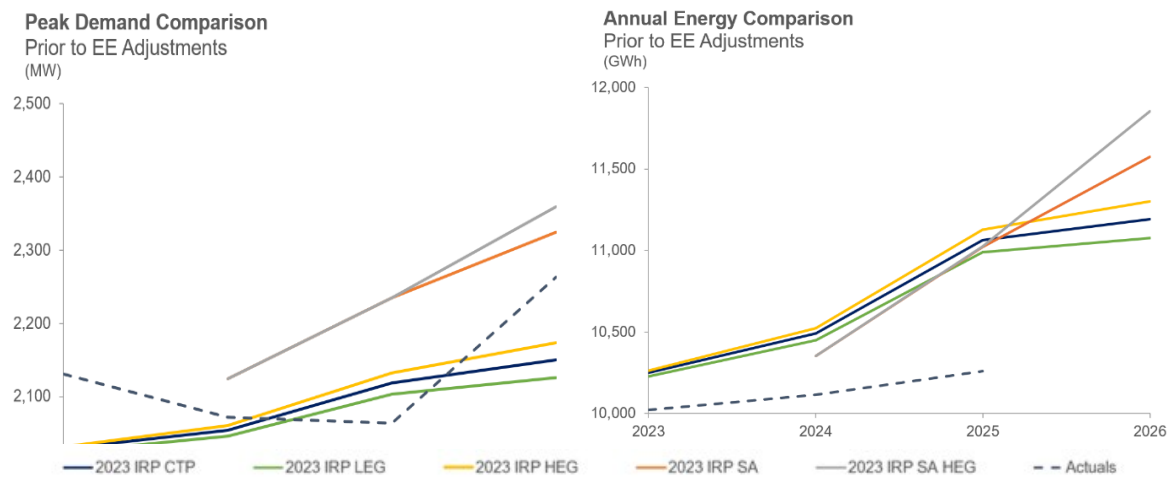
- Loads in several cases are adjusted upward to reflect a plausible higher rate of growth of large economic development loads. This ensures that a broad range of load trajectories are studied in the IRP; and
- In all cases, the impacts of future EE measures assumed to be embedded in the load forecast are removed to allow EE to be treated as a resource. The methods used to characterize those opportunities, including both measures to meet the requirements of the EUEA and additional programs, are discussed in Section 8.1.
- The potential impacts of Senate Bill 170 are embedded within the baseline forecast and serve as part of the starting point for the resource planning analysis.

Detailed analysis of how the load forecast was derived as well as the supporting data can be found in Appendix H.

Historical Forecast Accuracy

The process and methodology used to forecast future demand for the purposes of long-term planning has generally produced reasonable results when compared against actual historical demand. Figure 3-8 compares PNM's actual historical peak demand against the range of forecasts developed in the 2023 IRP. In the overlapping periods, actuals have tracked reasonably closely to the base case forecasts used in 2023 IRP CTP load forecast. More recently, however, stronger-than-expected growth driven by economic development, weather conditions, and increased electric vehicle adoption has caused actual peak demand to exceed the 2023 IRP forecasts. As a result, PNM conducted the 2023 IRP Supplement Analysis in response to a material increase in projected energy and peak demand identified in 2023 IRP.

FIGURE 3-8. COMPARISON OF LOAD FORECASTS DEVELOPED IN PRIOR IRP AGAINST HISTORICAL PEAK DEMAND



Notes:
1. HEG = High Economic Growth; CTP = Current Trends & Policy; LEG = Low Economic Growth; SA = Supplemental Analysis;
2. 2023 IRP forecasts include peak load impacts of energy efficiency measures

Table 3-3 provides additional details comparing the accuracy of peak demand forecasts developed in the 2023 IRP and 2023 IRP Supplement Analysis against actual results during overlapping periods. In most overlapping years, the forecasts used within the IRP are within 5% of the actual peak demand with the 2026 peak demand within 3% of the forecast. PNM's peak demand in 2026 of 2,262 MW[25] set a record for the system, driven by weather conditions in the southwest more severe than typical summer conditions in New Mexico. The actual peak is expected to be much higher based on the utilization of both PNM's DR programs and therefore much closer to the 2023 IRP Supplement Analysis forecast. Final details of the 2026 summer peak will be reconciled after the filing of this report. Considering that year-to-year weather

[25] Represents the highest peak as of August 3, 2026. Actual peak demand for summer 2026 is subject to change.

variability can cause variations in peak demand of this size, this recent variance is natural in the process of forecasting peak demand.

TABLE 3-3. COMPARISON OF PEAK DEMAND ACTUALS AGAINST 2023 IRP LOAD FORECASTS

	2023	2024	2025	2026
Actual Peak Demand (MW)	2,131	2,072	2,064	2,262
2023 IRP CTP Forecast (MW)	2,029	2,054	2,119	2,150
2023 IRP CTP Forecast Variance (%)	-4.8%	-0.9%	2.6%	-5.0%
2023 IRP CTP Supplemental Analysis Forecast (MW)	n/a	2,124	2,235	2,324
2023 IRP CTP Supplemental Analysis Forecast Variance (%)	n/a	2.5%	8.3%	2.7%

3.4.2 FORECAST SUMMARY

Using the methodology described above, a range of load forecasts are developed for the IRP. Each forecast represents a specific set of assumptions regarding demographic growth, economic development, BTM solar adoption, EV adoption, building electrification, TOU pricing, and weather conditions.

The three columns listed in Table 3-4 correspond to the primary “futures” investigated through the IRP. Each of these scenarios reflects a distinct vision of the future:

- **“Current Trends & Policy”** reflects the best estimates of the future state of the world based on the knowledge at the time of the IRP’s development. In this future, PNM assumes continued economic and population growth within its service territory, consistent with Woods and Poole forecasts, as well as modest levels of incremental customer solar adoption and electrification.
- **“High Economic Growth”** reflects a future of rapid economic expansion in New Mexico. In addition to higher growth in electricity demand, this future assumes stronger economic development, greater electric vehicle adoption and increased levels of building electrification.
- **“Low Economic Growth”** reflects a slower pace of economic development in New Mexico. This future assumes lower growth in electricity demand, weaker economic development, reduced electric vehicle adoption and slower industrial load growth.

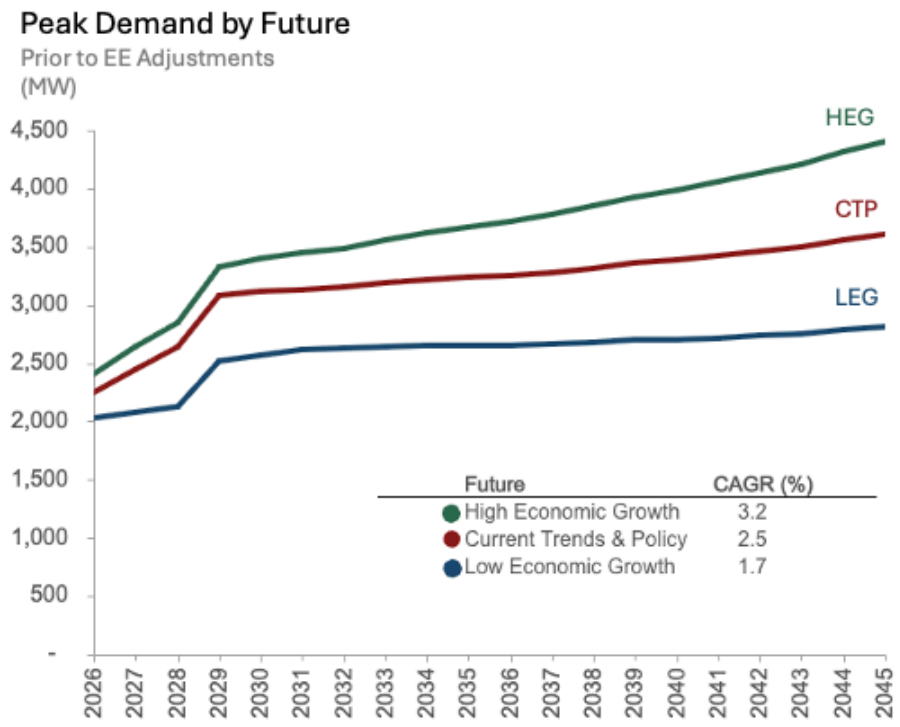
Table 3-4 summarizes the combinations of forecast assumptions used to develop the load forecast for each of the three futures. "Reference" represents the forecast assumptions most representative of present-day conditions and expected future trends. "High" and "Low" represent the respective high and low forecast assumptions for each forecasting component. The combination of these assumptions produces the load forecast used in the Current Trends and Policy, High Economic Growth, and Low Economic Growth futures.

TABLE 3-4. SUMMARY OF ASSUMPTIONS USED IN VARIOUS LOAD FORECAST SCENARIOS

Assumption	Current Trends & Policy	High Economic Growth	Low Economic Growth
Economic Forecast	Reference	High	Low
Economic Dev Loads	Reference	High	Low
BTM Solar	Reference	Low	High
EV Adoption	Reference	High	Low
Building Electrification	Reference	High	Reference
Industry	Reference	Reference	Low

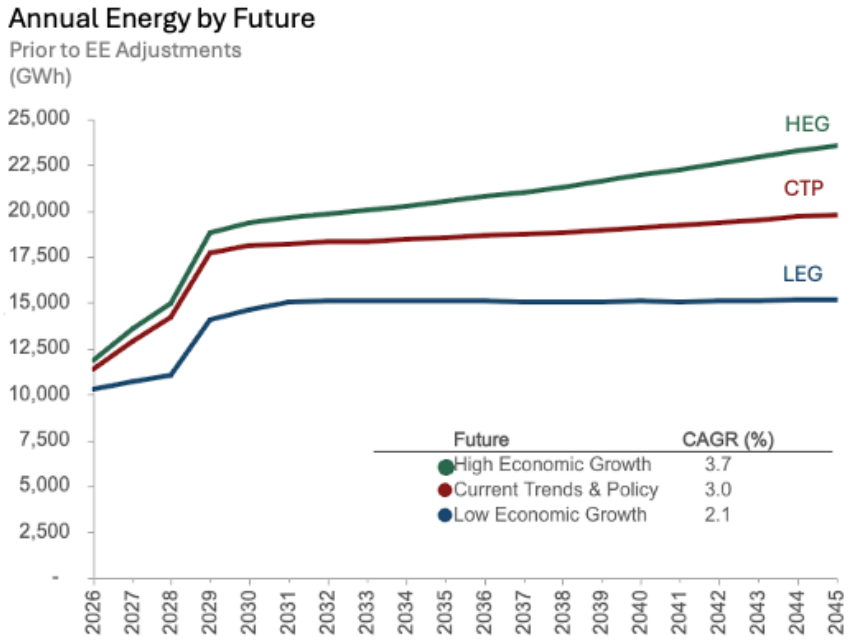
The peak demand and annual energy for each of the three futures are summarized in Figure 3-9 and Figure 3-10, respectively. Additional details for each of the demand forecasts can be found in Appendix H.

FIGURE 3-9. FORECASTS OF ANNUAL PEAK DEMAND UNDER DIFFERENT FUTURES



Note: Compound annual growth rate (CAGR) represents the constant annual growth rate that would result in the projected change in load between the beginning and ending years of the study period.

FIGURE 3-10. FORECASTS OF ENERGY DEMAND UNDER DIFFERENT FUTURES



Notes: Compound annual growth rate (CAGR) represents the constant annual growth rate that would result in the projected change in load between the beginning and ending years of the study period.

The rows listed in Table 3-4 represent a range of sensitivities upon the three futures, in which one or more input parameters are varied to examine their impact. Five sensitivities were created in the load forecast process that were carried forward for subsequent analysis in the IRP. Selection of specific sensitivities to study in the IRP was determined by these factors:

1. **Breadth of outcomes:** PNM's load is inherently uncertain, and effective planning requires consideration of a broad range of potential outcomes; certain sensitivities were included to ensure this range of conditions studied was sufficiently broad.
2. **Impact of the Data Center boom:** capturing the range of uncertainty with timing of high load growth.
3. **Understanding impacts:** the analysis of certain sensitivities can provide important information to PNM, the NMPRC, and stakeholders that may help inform future decisions.

Stakeholder Input: Align PNM's IRP EE Forecast and PNM's Energy Efficiency and Load Management Filing

After the 2023 IRP was filed, comments filed by a stakeholder observed that the creation of EE programs for the modeling in IRP by ICF appeared to conflict with the program goals (2024-2026) proposed by PNM in the 2023 EE and LM program plan.

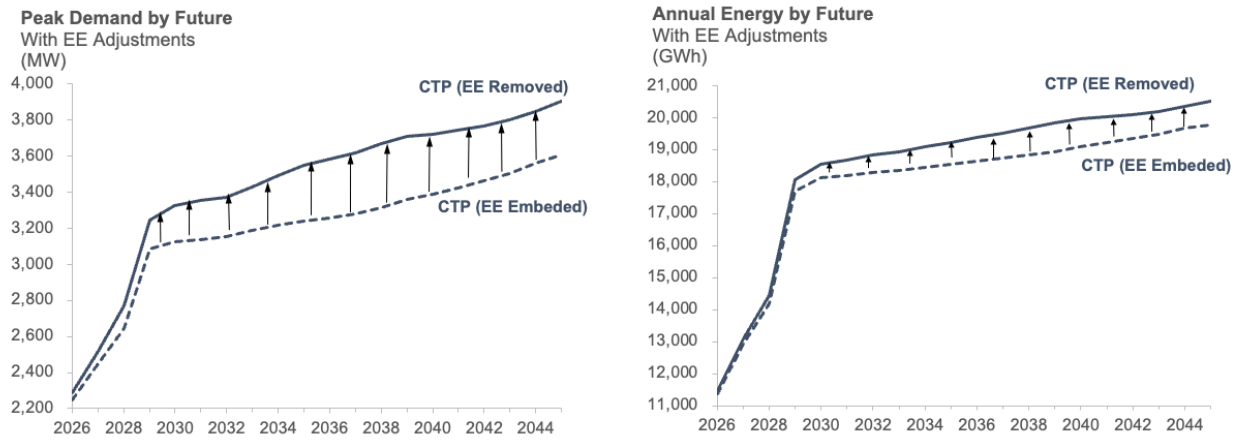
In response to this feedback, in the 2026 IRP, the statutory EE programs during 2026-2029 were calibrated to align with PNM's 2027 EE and LM program plan (Docket No. 26-0000074). Additionally, because the EE and LM program plan reports metered savings, whereas statutory EE programs are modeled as resources in the IRP, a 6.8% power loss factor is applied to the program plan savings to derive EE program savings and ensure consistency between the two representations.

Forecast Adjustment for Embedded Energy Efficiency

One of the enhancements introduced in the 2020 IRP that is still used today was the explicit treatment of EE programs as a resource option that could compete against supply-side options in the optimization of the portfolio. Rather than planning a supply-side portfolio to meet demand reflecting a static forecast of future efficiency, this enhancement allows the IRP to consider the role of efficiency more dynamically in the construction of the portfolio.

The 2026 IRP continues to use this approach to incorporate efficiency into the planning process. Treating efficiency as a resource option requires the load forecast to be adjusted upward, reflecting the embedded impact of future EE to avoid double-counting. The result of this adjustment is a higher load forecast that is used in the analysis. This adjustment to both annual energy and peak demand is illustrated in Figure 3-11 for the CTP future; the same adjustment is applied to all other futures and sensitivities analyzed.

FIGURE 3-11. ILLUSTRATION OF LOAD FORECAST ADJUSTMENT TO REMOVE LOAD IMPACTS OF EFFICIENCY TO ALLOW TREATMENT OF EFFICIENCY AS A RESOURCE IN IRP ANALYSIS



Commensurately, “bundles” of energy efficiency measures are characterized by their load impacts and costs and are included as resource options as discussed in Section 8.1.1. To the extent the bundles are selected in the portfolio, their inclusion would represent a load reduction relative to the “EE Removed” load forecast.

3.4.3 Key Assumptions in Load Forecast

The results described above reflect a buildup of sectoral load shapes and a number of key load modifiers. These drivers are discussed in further detail in this section.

Economic and Demographic Changes

Economic and demographic factors are a key driver of PNM’s future load growth. The demand forecasts are based on projections of (1) population growth in the service territory, (2) increases in the number of non-manufacturing jobs, and (3) real per capita income growth. Projections for each of these parameters, provided by Woods & Poole at the state and county level, are used as inputs to model future load based on historically observed relationships. The assumptions for each of these parameters are shown in Table 3-5.

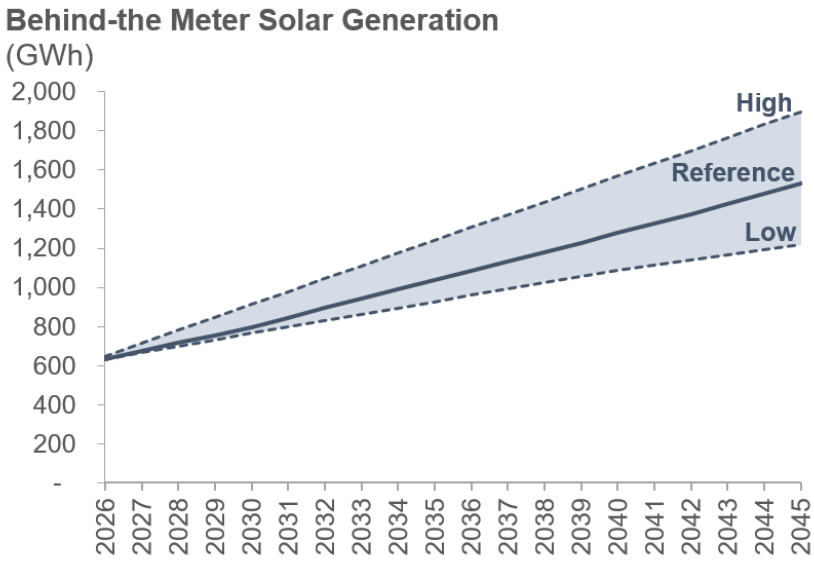
Table 3-5. Economic & Demographic Assumptions in the 2026 IRP (2026-2045 Averages)

Input Data	Low	Mid	High
Population Growth	4,200	8,900	13,700
Non-Manufacturing Employment Gains	2,500	5,300	8,700
Real Per Capita Income Growth	0.8%	1.1%	1.5%

Behind-the-Meter Solar

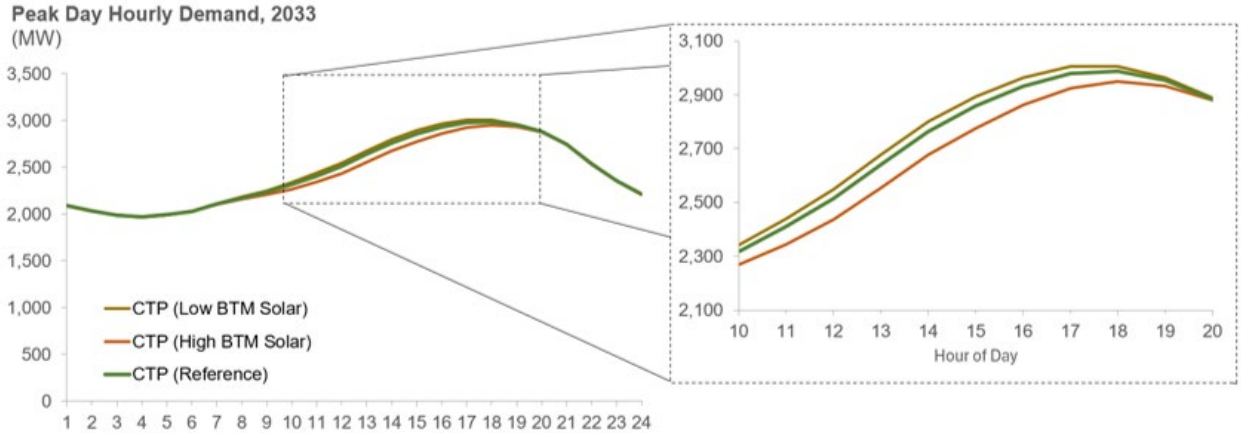
PNM’s IRP analysis considers a range of future BTM solar adoption, reflecting customers’ increasing interest in renewable energy. Projections for the BTM solar adoption are based on the past behavior of adoption in different customer rate classes. The current forecast is shown in Figure 3-12.

FIGURE 3-12. RANGE OF BTM SOLAR GENERATION STUDIED IN IRP



Sensitivities on BTM solar adoption reflect a plausible range of outcomes given increasing consumer preferences for customer-owned solar. These customer-sited solar systems are usually installed on rooftops but may have ground-mounted applications for some larger customer installations. BTM solar sensitivities range from “Low” forecast to a “High” forecast in which BTM solar production peaks at 945 MW in 2045. It is important to note that while BTM solar additions initially decrease peak load, this impact is less significant at any levels of adoption above that of the “Low” BTM solar forecast. This declining impact is expected because BTM solar shifts the peak to later hours, from 5-6 pm today and 6-7 pm by 2033, when there is little-to-no insolation, aligning with the declining impact of supply-side solar described in Section 8.2.1.

FIGURE 3-13. IMPACTS OF BTM SOLAR SENSITIVITIES ON LOAD SHAPE AND PEAK DEMAND

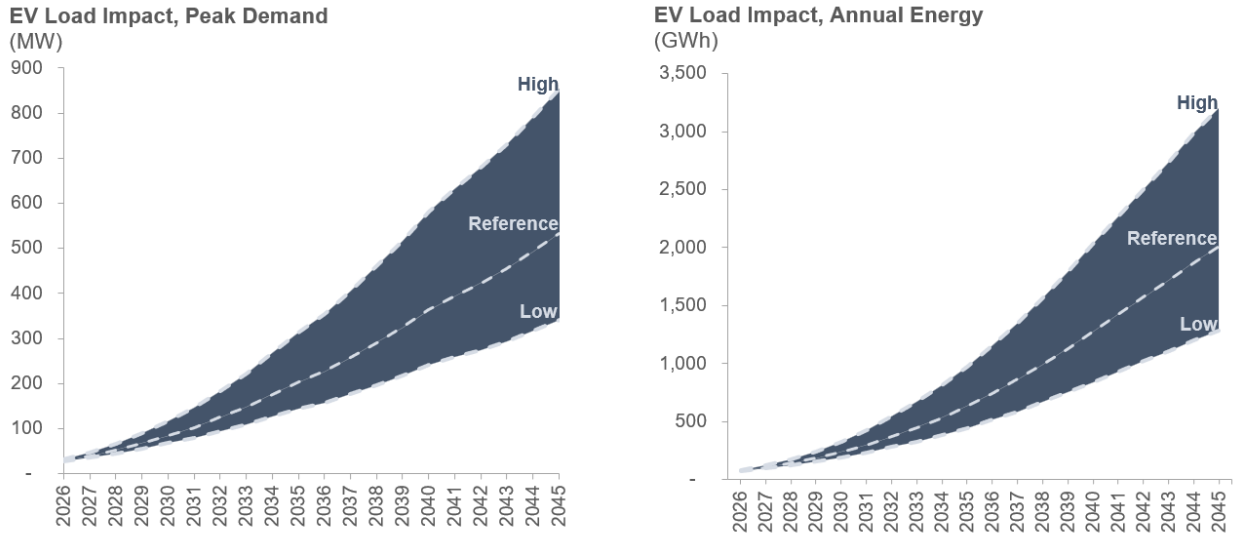


Transportation Electrification

Currently, demand from EVs represents a small share of annual retail loads. As of 2025, the number of light-duty EVs in PNM’s service territory is estimated at approximately 18,600. Looking

forward, PNM expects this segment of loads to grow significantly with increasing adoption of new EVs. The "Reference" EV adoption scenario assumes that, by 2045, this figure will increase to 245,000 EVs, reflecting the rapidly growing sales of EVs in New Mexico and the U.S. "Low" and "High" sensitivities capture a range of adoption of 164,000 to 387,000 vehicles by 2045. The implied increases in load in these scenarios are shown in Figure 3-14. With the projected acceleration in EV adoption over the forecast period, transportation electrification loads are expected to become an increasingly significant component of PNM's future loads.

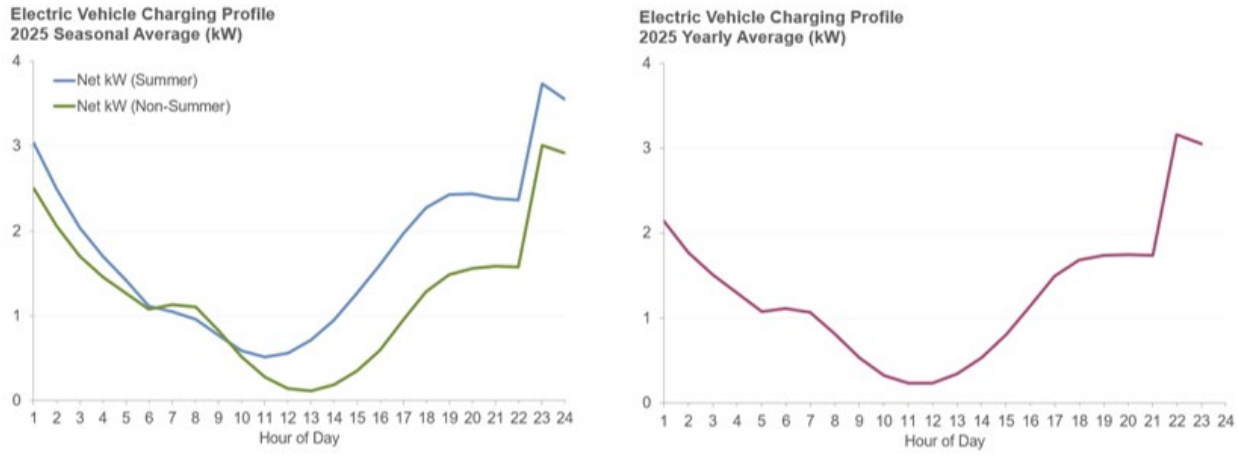
FIGURE 3-14. RANGE OF ELECTRIC VEHICLE LOADS CONSIDERED IN LOAD FORECAST DEVELOPMENT



While the projections developed for the IRP are based on plausible ranges of market growth, state and national policy may also play a role in the rate of EV adoption. In studies of economy-wide decarbonization, transportation electrification has commonly been recognized as a significant potential source of carbon reduction. The TEP and the IRA both provide financial incentives for EV deployment that may impact the forecast. PNM will continue to monitor this landscape as it evolves and ensure the planning efforts remain aligned with market trends and the state's policy priorities.

In addition to the rate of EV adoption, PNM evaluates charging patterns, as the timing of EV charging can materially influence system peak demand. Figure 3-15 presents the annual average hourly load profile and seasonal average hourly load profiles for WHEV customers in 2025. As introduced in Section 3.3.3, the WHEV rate provides lower prices during off-peak hours from 10:00 p.m. to 5:00 a.m. The load profile shows a distinct increase in electricity consumption beginning at 10:00 p.m., with usage remaining elevated overnight before gradually declining through the end of the off-peak period at 5:00 a.m. This pattern is consistent with the rate design's objective of shifting consumption to off-peak hours. The seasonal average hourly load data shows higher loads in the summer compared to non-summer months, which may correspond to a combination of increased vehicle travel, greater energy consumption from air-conditioning loads, and seasonal differences in travel behavior.

FIGURE 3-15. ANNUAL AVERAGE HOURLY LOAD PROFILE AND SEASONAL AVERAGE HOURLY LOAD PROFILES FOR WHEV CUSTOMERS IN 2025



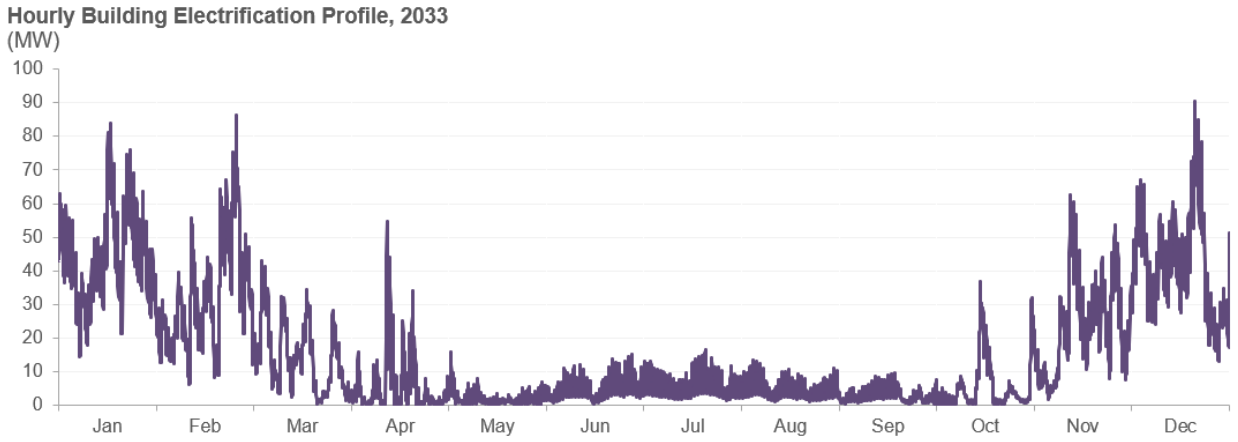
Building Electrification

Another potential source of future load growth is the electrification of building end uses. Like transportation electrification, building electrification has been identified in many studies as an effective strategy to support economy-wide carbon reductions. The impacts of IRA's tax credits for building electrification may lead to higher levels of adoption than the mid-level forecast.

High building electrification impacts are incorporated in the HEG future and associated sensitivities. In these cases, a "High" building electrification forecast assumes that beginning in 2030, there is a transition from natural gas and propane to electric alternatives and that 7,000 existing homes conduct the conversion each year. In combination, these measures increase the share of buildings with electric heat to 75% by 2045, increasing PNM's annual electric load by approximately 480 GWh (roughly 4% of today's energy demand).

Electrification of space heating and water heating end uses in buildings would also alter the shape of PNM's demand throughout the year. Figure 3-16 shows hourly load shape for incremental loads introduced in the High Building Electrification sensitivity, illustrating how the load impact associated with these measures is expected to be larger in the winter (predominantly due to space heating). At this level of building electrification, PNM would remain a summer peaking system – the winter peak in 2045 is approximately 600 MW lower than the summer peak – but the incremental loads in the winter do have implications for PNM's resource adequacy needs in a carbon-free portfolio when reliability risks may surface in the winter.

FIGURE 3-16. HIGH BUILDING ELECTRIFICATION SENSITIVITY: HOURLY SHAPE FOR INCREMENTAL LOAD

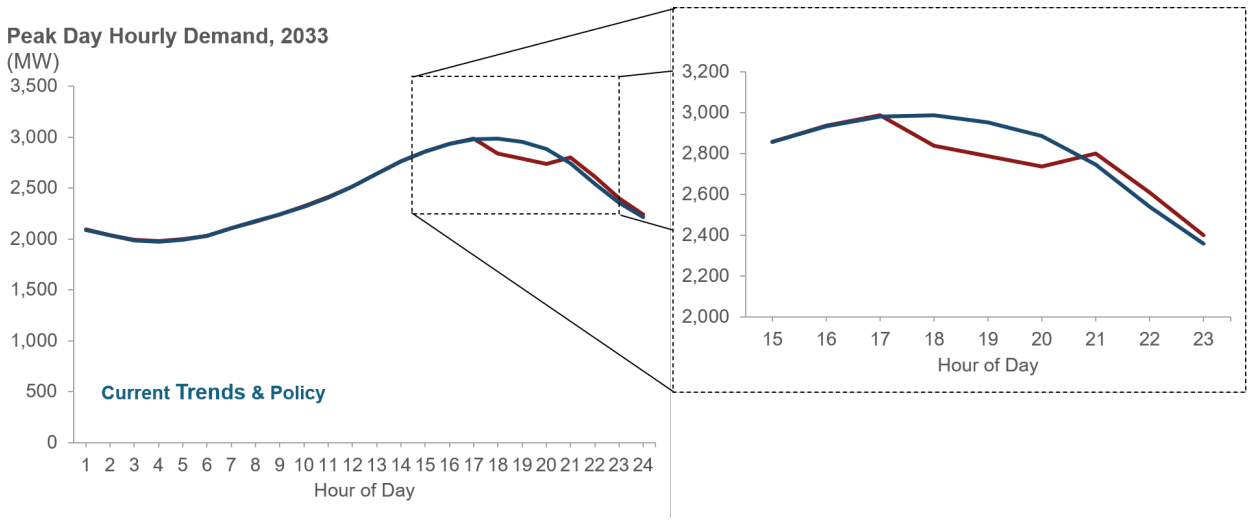


Time- of-Use/Time of Day Rates

As discussed in Section 3.3.22, PNM is currently considering expansion of TOU/TOD rates to new customer classes in the future. By better aligning customers' retail rates with PNM's own underlying cost of producing electricity, TOU/TOD rates can incentivize reductions in consumption during the peak period, reducing the need for investments to maintain resource adequacy. To characterize the potential benefits of the implementation of TOU/TOD rates, the IRP includes a sensitivity that captures the expected effect of TOU/TOD rates on load shape.

Sensitivity analysis is based on a TOU/TOD rates scheme in which the highest cost hours occur from 5-8 pm in summer as well as 5-8 am and 5-8 pm in winter, which PNM expects to align with periods of most constrained supply in the near term. Additionally, PNM considers an EV rate where electricity would be cheapest from 10 pm to 5 am. These rates would begin as pilots in 2025 before becoming full programs by 2030. The impact that this has on the peak day load shape is illustrated in Figure 3-17, but will vary by year due to growth and changes in the shape of retail load. By 2033, PNM estimates that TOU/TOD pricing could reduce peak demand by 165 MW.

FIGURE 3-17. IMPACTS OF TOU/TOD PRICING SENSITIVITIES ON LOAD SHAPE AND PEAK DEMAND



In the long term, it may be prudent to further adjust TOU/TOD periods to maintain alignment with the underlying cost of supply as PNM integrates additional renewable and storage resources. For simplicity, the peak period is not adjusted during this analysis, but PNM recognizes that maximizing the value a rate program will require continuous reevaluation of how to structure the periods.

4. PNM's Existing & Planned Resources

Chapter Highlights

1. PNM's existing resource portfolio includes a diverse mix of firm dispatchable, dynamic balancing and carbon-free resources, including nuclear, natural gas, renewable energy, battery storage, and demand-side resources.
2. Since the 2023 IRP, PNM has expanded its renewable energy and battery storage portfolio, reduced the amount of nuclear energy and, consistent with NMPRC Rulings, plans to be coal free by 2031.
3. PNM has several approved projects that will become operational in the next 2 years from its Distribution Battery Filing and 2028 Resource Applications, including 390 MW of solar, 648 MW of battery storage, and an extension of the Valencia Energy Facility.
4. PNM will also be seeking approval for resources as part of its 2029-2032 Resource Application, including 240 MW solar, 800 MW of wind, 610 MW battery storage, extending operations for 146 MW of gas and 40 MW of new gas.

Developing a long-term resource plan begins with a comprehensive assessment of the current system and associated operating capabilities. This chapter provides an overview of PNM's existing, approved, and pending generation and storage assets. PNM's portfolio continues to transition towards the clean energy mandates established under New Mexico's ETA, while prioritizing grid reliability and affordability for customers. Over the past several years, PNM's portfolio has systematically shifted away from coal-fired generation, marked by the retirement of the SJGS, and expanded its procurement of utility-scale renewable energy resources and battery energy storage. These additions have driven a sustained decline in portfolio carbon dioxide emissions, demonstrating steady, measurable progress toward long-term state decarbonization objectives.

PNM's portfolio consists of a diverse portfolio of resources, most of which are in-service and operating as of the time of the filing of this IRP. Some resources are in several different states of commercial status and development. For clarity throughout this IRP, resources have been categorized into three groups:

- **Existing Resources:** all resources currently in service at the time of the IRP's publication;
- **Approved Resources Not Yet in Service:** a collection of resource additions already approved by the Commission that will enter PNM's portfolio by 2028; and
- **Pending Resources Not Yet Approved:** an additional group of resources that includes both projects currently being considered by the Commission for approval and placeholder resources for PNM's RFP Supplement filing.

4.1 Existing Resources

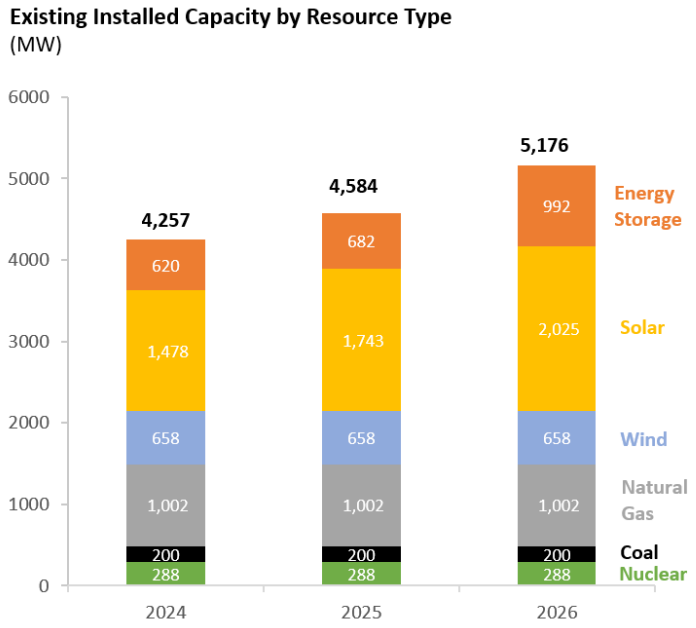
The existing resource portfolio serves as the foundation for this 2026 IRP. It comprises utility-owned assets and long-term contracted resources across many resource technology types.

As of this filing, PNM's supply-side generation portfolio includes:

1. **Nuclear:** A 288 MW ownership interest in the PVNGS;
2. **Coal:** A 200 MW ownership share of the FCPP, the sole remaining coal-fired resource in PNM's portfolio, scheduled for exit no later than 2031;
3. **Natural Gas:** 1,002 MW of natural gas-fired generating capacity across PNM-owned facilities and contracted resources;
4. **Wind:** 658 MW of capacity (nameplate) of wind generation resources under long-term PPAs;
5. **Solar:** 2,025 MW of utility-scale solar nameplate capacity;
6. **Battery Storage:** 992 MW of BESS; and
7. **Geothermal:** The 11 MW Dale Burgett geothermal generating facility in southern New Mexico.

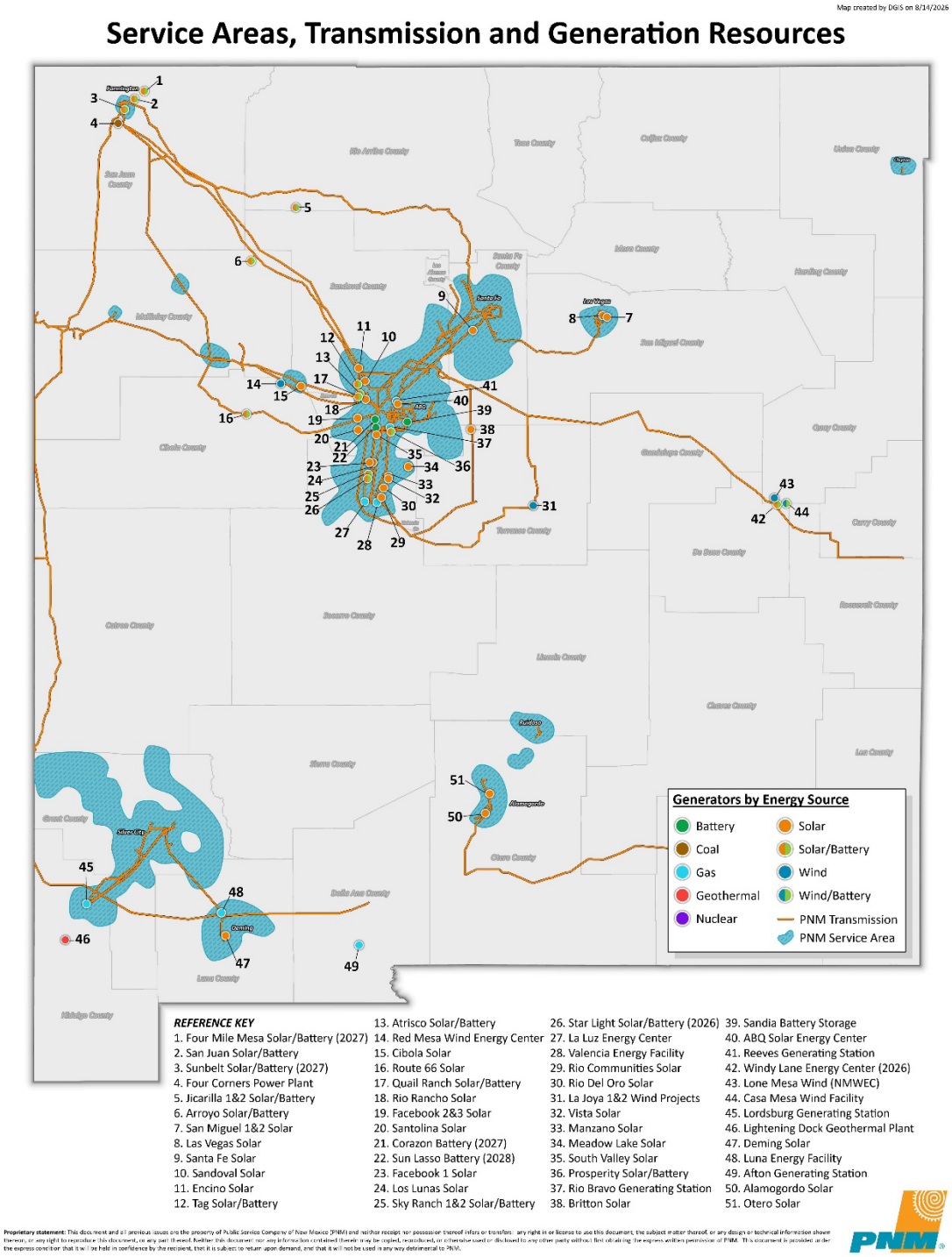
In addition to supply-side resources, PNM relies on a portfolio of EE and DR programs to reduce system requirements and help meet customer demand. These demand-side resources are detailed in Section 3.2. Figure 4-1 shows PNM's existing installed capacity by resource and Figure 4-2 maps locations of PNM's fleet of resources within New Mexico.

FIGURE 4-1. INSTALLED CAPACITY OF PNM'S EXISTING RESOURCE PORTFOLIO BY RESOURCE TYPE



Note: PNM's existing portfolio also includes 11 MW of geothermal (not shown in the figure above)

FIGURE 4-2. MAP OF PNM'S EXISTING GENERATION & STORAGE RESOURCES



While installed portfolio nameplate capacity can provide a general view of system size, annual energy production better reflects how each technology contributes to serving customer load and advancing decarbonization goals. Because variable renewable resources, dispatchable thermal

generation, and energy storage each serve distinct operational roles throughout the year, the resulting energy production mix differs noticeably from installed capacity.

Table 4-1 summarizes the key operating characteristics of PNM's current portfolio, including annual net generation, greenhouse gas emissions, carbon intensity, and water consumption based on the most recent historical operating year.

TABLE 4-1. KEY STATISTICS FOR PNM'S EXISTING RESOURCE PORTFOLIO (BASED ON 2025 HISTORICAL OPERATIONS)

Technology	Annual Net Generation (MWh)	Share of Annual Net Generation (%)	Total CO_2 Emissions (short tons)	Carbon Intensity (lbs/MWh)	Total Freshwater Use (000s gallons)	Freshwater Use Intensity (gal/MWh)
Nuclear	2,284,469	23%	-	-	38,084	17
Coal	408,292	4%	401,252	1,966	805,064	1,972
Natural Gas	1,641,097	16%	923,608	1,126	371,623	226
Geothermal	58,072	1%	-	-	-	-
Wind	1,746,125	17%	-	-	-	-
Solar	3,901,333	39%	-	-	-	-
Total	10,039,388	100%	1,324,860	264	1,214,771	121

As PNM continues integrating renewable generation, energy storage, and other carbon-free resources, the portfolio's greenhouse gas emissions and water consumption are expected to decline further. Following the retirement of the SJGS, the FCPP represents the primary source of carbon emissions in PNM's generation portfolio. Executing PNM's planned exit from Four Corners by 2031, coupled with continued ongoing investments in renewable generation, storage, and demand-side resources, will further reduce the environmental footprint of the portfolio. Although PNM may need to procure carbon emitting resources such as flexible natural gas combustion turbines to maintain reliability and/or bolster system resiliency, PNM is committed to meeting the clean energy mandates established under New Mexico's ETA.

Consistent with 17.7.3.8(B)(1) NMAC, this chapter describes the resources currently used to serve PNM's jurisdictional retail load. Additional technology-specific information is provided in the subsections below, while comprehensive resource and technical data are compiled in Appendix E.

4.1.1 NUCLEAR

PNM holds a 288 MW ownership interest in the PVNGS, a jointly owned nuclear facility operated by Arizona Public Service Company (APS) on behalf of a consortium of Southwestern utilities. Since the 2023 IRP, PNM's ownership share has decreased from 402 MW to 288 MW following the expiration and non-renewal of 114 MW of leased capacity across 2023 and 2024. Additional information on PVNGS is provided in Appendix E.

4.1.2 Coal

Following the retirement of the SJGS in September 2022, PNM's coal-fired generation portfolio consists of its ownership interest in the FCPP. PNM owns a 13% share of Units 4 and 5, providing 200 MW of net dependable summer capacity.

Located on the Navajo Nation near Fruitland, New Mexico, FCPP is operated by APS. Coal is supplied by the adjacent Navajo Mine under agreements that run through 2031. While FCPP currently provides firm dispatchable capacity and energy to support system reliability, it represents the single largest remaining source of carbon emissions in PNM's portfolio.

In alignment with the ETA and PNM's long-term resource strategy, the Company plans to exit its ownership interest in FCPP by July 2031. In 2021, PNM applied to the NMPRC to abandon its interest early at the end of 2024. Following the NMPRC's denial of the application, PNM appealed their decision to the New Mexico Supreme Court, which ultimately upheld the NMPRC's order. Consequently, PNM has assumed FCPP's continued operation until July 2031. Additional information regarding FCPP Exit evaluations are provided in Section 1.5.9 and detailed information regarding the PNM's share of the plant is provided in Appendix E.

4.1.3 Natural Gas

Natural gas-fired generation remains essential for maintaining system and operational flexibility as PNM integrates higher penetrations of renewable energy. PNM's existing natural gas fleet comprises of six utility-owned generating facilities and one long-term PPA, representing approximately 1,000 MW of firm dispatchable generation.

The fleet is strategically distributed across PNM's service territory to fulfill distinct operational needs:

- **Southern New Mexico Assets:** Located near the El Paso Natural Gas pipeline system, these facilities provide efficient access to regional natural gas supplies.
- **Albuquerque Metro Assets:** Located near the Albuquerque load center, these units provide generation in a transmission-constrained area while providing essential voltage support and grid reliability.

PNM's combined cycle resources are located in Southern New Mexico and operate in an intermediate duty cycle with annual capacity factors typically ranging between 25-50%. PNM's remaining natural gas fleet functions predominately in a peaking and load-following role. These assets primarily serve a peaking role by providing dispatchable capacity that can respond quickly during periods of high demand, reduced renewable generation or system reliability purposes. This operating profile is reflected in the fleet's relatively low utilization, with capacity factors ranging from 5% to details the operating characteristics, including capacity factor, for each natural gas resource based on the most recent historical operating year.

TABLE 4-2. SUMMARY STATISTICS FOR EXISTING NATURAL GAS RESOURCES (BASED ON 2025 HISTORICAL OPERATIONS)

Facility	Type	Installed Capacity (MW)	Annual Net Generation (MWh)	Capacity Factor (%)	Total CO_2 Emissions (short tons)	Carbon Intensity (lbs/MWh)	Freshwater Use (000 gallons)	Freshwater Use Intensity (gallons/ MWh)
Afton	CC	235	486,991	24%	255,268	1,048	23,620	52
La Luz	CT	41	16,369	5%	9,304	1,137	588	39
Lordsburg	CT	86	71,495	9%	41,111	1,150	13,672	199
Luna	CC	190	434,140	26%	174,520	804	183,141	437
Reeves	ST	146	182,626	14%	141,582	1,551	149,134	895
Rio Bravo	CT	149	296,977	23%	203,654	1,372	392	1
Valencia	CT	155	152,499	11%	98,171	1,287	1,076	7
Total		**1,002**	**1,641,097**	**19%**	**923,608**	**1,126**	**371,623**	**226**

Notes: CC = Combined Cycle; CT = Combustion Turbine; ST = Steam Turbine

Natural gas resources are dispatched to complement variable renewable generation, meet peak customer demand, maintain required operating reserves, and respond to real-time grid conditions. These resources also continue to deliver crucial reliability and firming services that cannot currently be met by renewable resources and short-duration energy storage alone.

To support reliable operations while managing customer costs, PNM actively manages fuel procurement for the natural gas fleet through a balanced mix of forward purchases and spot market transactions. System fuel requirements are continually evaluated against projected customer demand, weather forecasts, scheduled planned maintenance, and expected market system operating conditions to ensure adequate fuel availability.

As customer demands, energy requirements and PNM's resource portfolio changes over time, dispatchable natural gas remains a critical resource for system reliability - delivering firm, fast-ramping capacity when wind and solar generation output is unavailable, particularly for extended periods of time. Future decisions regarding PNM's gas fleet will consist of weighing operational and reliability needs against other carbon-free dispatchable technologies, evolving environmental policies, and commercial availability of emerging technologies.

Reeves Life Extension Analysis

Reeves is a 146-MW firm, dispatchable natural gas resource located in the middle of the Albuquerque metro area. Beyond supplying peak capacity, Reeves provides critical local voltage support and alleviates transmission constraints under normal and contingency operating conditions.

With Reeves approaching the end of its depreciable life in 2030, PNM engaged Black & Veatch to determine the capital and operational expenditures required to extend the facility's life through

2044. PNM then evaluated portfolio economics with and without the extension in the context of its 2029–2032 RFP evaluation. As discussed in PNM's 2029-2032 resource application, PNM determined;

- Extending Reeves through 2044 consistently reduced total NPV by $50 million to $75 million NPV compared to retirement in 2030 under base case load scenarios.
- Under elevated load growth assumptions, the extension's economic benefit increased significantly, reducing 20-year NPV costs by more than $140 million.
- The extension preserves vital in-region transmission support within the Albuquerque load pocket that would otherwise require costly network upgrades.

Conclusion: Based on these findings, the Reeves life extension was integrated into the 2026 IRP baseline portfolio as a proven, cost-effective solution for resource adequacy and local grid reliability. (Additional information regarding Reeves extension analysis is discussed in Section 1.5.1 and details regarding Reeves are provided in Appendix E.)

4.1.4 Geothermal

Geothermal generation delivers firm, carbon-free baseload energy that uniquely complements PNM's renewable energy portfolio. Unlike wind and solar generation, geothermal facilities can operate continuously regardless of weather conditions, providing high capacity-factor energy production with zero CO_2 emissions. PNM purchases 11 MW of geothermal capacity from the Dale Burgett Geothermal Facility under a long-term PPA. While geothermal currently accounts for a small share of PNM's total generating portfolio, its non-variable operating profile enhances resource diversity and supports the transition to a zero-carbon system. Further operational and contractual specifications are provided in Appendix E.

4.1.5 Wind

Wind generation is a key component of PNM's carbon-free resource portfolio, delivering a substantial share of the renewable energy produced to serve retail load. PNM has contracted for 658 MW of nameplate wind capacity across five utility-scale facilities under long-term PPAs. As shown in Table 4-3, these five wind PPAs generated approximately 1,750 GWh of carbon-free electricity in 2025, representing 17% of PNM's total annual energy production. Additional details on each wind facility can be found in Appendix E.

TABLE 4-3. SUMMARY STATISTICS FOR EXISTING WIND RESOURCES (BASED ON 2025 OPERATIONS)

Resource	Nameplate Capacity (MW)	Annual Net Generation (MWh)	Capacity Factor (%)
Casa Mesa	50	180,605	41%
La Joya I	165	494,483	34%
La Joya II	141	402,901	33%
NMWEC	200	504,921	29%
Red Mesa	102	163,215	18%
Total	658	1,746,125	30%

Wind generation exhibits distinct diurnal and seasonal patterns that dictate its hourly and monthly contribution to PNM's energy portfolio. As shown in Figure 4-3, New Mexico wind resources generally produce peak energy output during the spring and winter months, and lower output in the summer. Daily wind generation typically ramps up during the late afternoon, evening, and overnight hours, delivering carbon-free energy when solar output is declining or unavailable.

Historical 2025 wind energy production is tabulated by both month and time of day, with capacity factors ranging from the low teens during some periods to nearly 50% during others. The data also indicates that low-wind conditions can persist across consecutive hours and days, rather than occurring as isolated events. Additional historical operating metrics for the wind fleet are compiled in Appendix E.

FIGURE 4-3. HISTORICAL AVERAGE CAPACITY FACTOR BY MONTH AND TIME OF DAY FOR PNM'S WIND RESOURCES (2025)

Month	Hour of Day																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Jan	36%	37%	36%	33%	31%	30%	29%	31%	28%	26%	27%	30%	34%	39%	40%	40%	45%	46%	46%	45%	43%	42%	40%	37%
Feb	47%	46%	44%	42%	42%	41%	41%	37%	27%	25%	27%	27%	29%	31%	32%	32%	37%	44%	47%	48%	48%	48%	46%	46%
Mar	47%	49%	48%	46%	44%	43%	39%	29%	25%	25%	26%	27%	28%	30%	30%	31%	35%	44%	47%	47%	47%	45%	46%	49%
Apr	43%	45%	43%	41%	37%	33%	29%	21%	20%	21%	23%	24%	28%	29%	29%	32%	32%	35%	39%	39%	42%	44%	44%	42%
May	27%	27%	28%	25%	23%	24%	21%	18%	18%	18%	20%	19%	21%	23%	25%	27%	28%	31%	28%	31%	35%	36%	34%	30%
Jun	33%	31%	29%	25%	24%	22%	16%	13%	12%	12%	14%	15%	16%	17%	21%	26%	28%	28%	29%	29%	32%	34%	37%	35%
Jul	24%	22%	23%	23%	23%	22%	16%	13%	13%	13%	12%	12%	14%	15%	19%	25%	27%	29%	27%	27%	26%	27%	28%	26%
Aug	32%	33%	31%	30%	29%	26%	19%	12%	11%	11%	9%	10%	11%	13%	17%	19%	23%	27%	30%	30%	33%	32%	29%	30%
Sep	22%	21%	19%	18%	16%	16%	14%	12%	11%	12%	12%	14%	16%	19%	20%	21%	24%	23%	25%	28%	27%	28%	26%	23%
Oct	35%	34%	32%	30%	28%	24%	25%	22%	19%	20%	21%	24%	26%	28%	28%	28%	30%	31%	34%	39%	40%	38%	39%	38%
Nov	38%	37%	36%	34%	32%	31%	30%	26%	20%	18%	20%	21%	23%	25%	25%	26%	30%	34%	38%	40%	38%	38%	38%	39%
Dec	50%	47%	46%	47%	47%	45%	43%	43%	37%	32%	33%	33%	35%	36%	38%	38%	40%	44%	47%	48%	47%	48%	47%	48%

4.1.6 SOLAR

Utility-scale solar generation is a critical component of PNM's carbon-free resource portfolio and will play an expanding role in meeting long-term customer energy needs. The solar portfolio combines utility-owned facilities and contracted resources across 19 sites throughout New Mexico. Together, these resources represent 1,743 MW of installed solar capacity as of 2025.

TABLE 4-4. SUMMARY STATISTICS FOR TYPICAL EXISTING SOLAR RESOURCES (BASED ON 2025 OPERATIONS)

Resource	Nameplate Capacity (MW)	Annual Net Generation (MWh)	Capacity Factor (%)
Arroyo Solar	300	698,239	27%
Atrisco Solar	300	722,743	28%
Britton	50	141,555	32%
Encino	50	142,767	33%
Encino North	50	136,776	31%
Jicarilla Solar 1	50	112,498	26%
Jicarilla Solar 2	50	127,606	29%
Route 66 Cibola	50	123,467	28%
San Juan North Solar 1	200	502,243	29%
Sky Ranch Solar	190	504,115	30%
NMRD Solar 1-3	30	78,149	30%
PNM Owned Solar	158	365,147	26%
Quail Ranch Solar[a]	100	275,94	32%
TAG Solar[a]	140	404,712	33%
Community Solar Phase 1[a,b]	25	72,270	33%
Total	1,743	4,408,227	29%

Notes:
a. Full year estimated energy production is provided as these resources generated partially in 2025.
b. Community Solar Phase 1 is eventually expected to grow to 125 MW total capacity.

Figure 4-4 illustrates the typical historical average hourly production profile of PNM's solar portfolio by month. Historical performance data show pronounced seasonal and diurnal variability, with midday capacity factors frequently exceeding 80% during the highest-producing months and approaching 90% during select hours. During typical system peak hours, typical solar output ranges from approximately 24% to 64% of nameplate capacity, depending on the season. However, PNM's most resource-constrained periods are post solar production hours, which necessitates shifting daytime solar energy to later evening hours via storage resources. Additional facility-specific historical performance data is compiled in Appendix E.

FIGURE 4-4. HISTORICAL AVERAGE CAPACITY FACTOR BY MONTH AND TIME OF DAY FOR PNM'S SOLAR RESOURCES (2025)

Month	Hour of Day																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Jan	-	-	-	-	-	-	-	4%	42%	65%	66%	62%	61%	62%	65%	60%	24%	1%	-	-	-	-	-	-
Feb	-	-	-	-	-	-	-	17%	58%	73%	75%	75%	74%	75%	73%	68%	46%	8%	-	-	-	-	-	-
Mar	-	-	-	-	-	-	5%	41%	62%	66%	67%	66%	68%	65%	63%	60%	49%	18%	1%	-	-	-	-	-
Apr	-	-	-	-	-	1%	32%	63%	70%	75%	75%	74%	73%	73%	71%	68%	64%	35%	4%	-	-	-	-	-
May	-	-	-	-	-	8%	53%	71%	76%	75%	78%	78%	77%	74%	70%	65%	62%	45%	11%	-	-	-	-	-
Jun	-	-	-	-	-	11%	54%	73%	78%	83%	87%	89%	84%	76%	71%	68%	64%	54%	19%	1%	-	-	-	-
Jul	-	-	-	-	-	6%	41%	69%	78%	82%	86%	86%	84%	78%	72%	65%	56%	43%	15%	-	-	-	-	-
Aug	-	-	-	-	-	1%	30%	70%	82%	87%	88%	86%	84%	80%	72%	64%	53%	31%	6%	-	-	-	-	-
Sep	-	-	-	-	-	-	15%	56%	71%	78%	78%	75%	74%	72%	65%	62%	48%	14%	-	-	-	-	-	-
Oct	-	-	-	-	-	-	5%	44%	65%	66%	64%	62%	60%	59%	55%	52%	27%	2%	-	-	-	-	-	-
Nov	-	-	-	-	-	-	-	23%	60%	65%	64%	62%	61%	60%	60%	49%	11%	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	6%	44%	62%	62%	59%	58%	62%	62%	48%	9%	-	-	-	-	-	-	-

PNM's solar portfolio has expanded rapidly in recent years, driven primarily by replacement capacity needs following the retirement of the SJGS and leased capacity from PVNGS. This fleet expansion was executed through successive competitive procurements and Commission-approved resource plans. Additional details on annual solar capacity additions are compiled in Appendix E.

Many of PNM's utility-scale solar facilities are paired with BESS, allowing solar energy generated during peak daylight hours to be stored and dispatched later in the day to align with sustained high customer demands. This solar-plus-storage configuration significantly enhances the operational value and capacity contribution of solar resources, supporting system reliability and reducing reliance on fossil-fueled generation.

4.1.7 ENERGY STORAGE

Battery energy storage has become a vital component of PNM's supply-side portfolio, providing the operational flexibility needed to maintain grid reliability for a system that has a significant amount of renewable energy production. PNM's storage fleet includes both standalone facility deployments and hybrid resources co-located with utility-scale solar. These systems absorb excess generation during periods of high renewable output and discharge energy during high-demand windows or periods of reduced renewable production.

Beyond energy time-shifting, BESS resources supply essential grid stability services, including spinning and operating reserves, fast frequency response, ramping capability, renewable integration and local voltage support. These ancillary service capabilities maximize the effective value of storage resources.

BESS resources' main constraint is that they are energy limited, meaning a sustained discharge of stored energy is limited to the design of each facility before it must recharge. Operators must manage the state of charge carefully so that each BESS facility or fleet can provide reserves, regulation and/or ancillary services when called while still meeting its energy shifting and capacity value.

Utility-scale battery energy storage systems are not limited to charging or discharging only at their rated storage duration. Rather, battery systems are defined by both a power rating (MW) and an energy capacity (MWh), allowing operators to vary charge and discharge rates based on system needs, market conditions, and operational constraints. For example, a 100 MW / 400 MWh battery is commonly referred to as a four-hour system because it can discharge at its full 100 MW rating for four hours. However, the same system could be discharged at 50 MW for eight hours, 25 MW for sixteen hours, or at any intermediate output level within its operating range. Likewise, charging can occur at varying rates depending on available energy, transmission constraints, and economic signals. This operational flexibility enables battery storage resources to provide a wide range of grid services, including energy shifting, capacity, frequency regulation, operating reserves, renewable integration, and congestion management, while optimizing the utilization of the stored energy. The ability to continuously adjust charge and discharge rates is a key characteristic that distinguishes battery storage from conventional generation resources and enhances its value to the electric system.

At the time of this filing, PNM's storage portfolio is comprised of 992 MW / 3,968 MWh of nameplate capacity and storage duration across its service territory. Facility-specific configurations and operating characteristics are detailed in Appendix E.

4.2 Approved Resources Not Yet In-Service

To meet projected load growth, maintain resource adequacy, and satisfy New Mexico ETA targets, the NMPRC has approved several near-term resource additions that are not yet commercial or fully operational. These approved projects, consisting of new solar, battery energy storage and extension of an existing contract for natural gas capacity, represent committed resources that will integrate into PNM's operating fleet over the next few years.

While these resources have secured necessary regulatory approvals from the Commission, they remain in various stages of final procurement, interconnection, permitting or construction. Table 4-5 summarizes these approved assets by category along with their expected nameplate capacities and in-service year. For this IRP, PNM has assumed each of these resources to begin operation by the expected in-service year and continue through each contract end date or expected operating life.

TABLE 4-5. LIST OF APPROVED RESOURCES NOT YET IN SERVICE

Category	Resource	Capacity (MW)	Expected In-Service Year
Community Solar Phase 2	Various Locations	185	2029
Distribution Battery Filing	Distribution Storage Facilities	30	2027
2028 Resource Application	Corazon Storage	150	2027
	Valencia Extension	167	2028
	Sunbelt Solar	100	2027
	Sunbelt Storage	50	2027

Category	Resource	Capacity (MW)	Expected In-Service Year
	Sun Lasso Storage	150	2027
2028 Resource Application (Rate 36B)	Four Mile Solar	100	2027
	Four-Mile Storage	100	2027
	Windy Lane Solar	90	2026
	Windy Lane Storage	68	2026
	Starlight Solar	100	2026
	Starlight Storage	100	2026

4.3 Pending Resources Not Yet Approved

Unlike the approved resources detailed in previous sections, the projects summarized below have not yet received formal authorization from the NMPRC to own or contract for these resources. All of these proposed resources are included in PNM's 2029-2032 System Resources application, filed in May 2026. Their ultimate inclusion in PNM's operating fleet remains contingent upon regulatory approval, final contractual execution, and the satisfaction of project development milestones. Table 4-6 outlines these pending resource proposals along with their capacity, and targeted commercial operation dates. For this IRP, PNM has assumed each of these resources to begin operation by in-service year and continue through each contract end date or expected operating life. Should the final approved resources materially differ from the base resource assumptions used in the 2026 IRP evaluation, PNM will evaluate its options at that time and decide a path forward.

TABLE 4-6. LIST OF PENDING RESOURCES NOT YET APPROVED

Category	Resource	Capacity (MW)	Expected In-Service Year
2029-2032 Resource Application	Palomas Wind	800	2029
	La Luz II	40	2031
	TAG II BESS	90	2029
	Britton BESS	60	2029
	Encino BESS	110	2029
	Wildcat BESS	50	2029
	Cat Hills BESS	150	2031
	Gila Monster BESS	150	2031
	Wildcat Solar	90	2029
	Cat Hills Solar	150	2031

5. Transmission and Distribution System

Chapter Highlights

1. The IRP and transmission planning are an iterative, mutually dependent feedback loop, not sequential processes.
2. The Distribution System Plan (DSP), Grid Modernization Plan, and IRP are becoming a coordinated planning triad.
3. Merchant/independent transmission development is reshaping New Mexico's export and market options.

5.1 Existing System

PNM is one of more than 60 transmission service providers in the Western Interconnection. As both a transmission operator and transmission owner, PNM provides open access transmission services under a pro forma Federal Energy Regulatory Commission (FERC) tariff to serve retail and wholesale customers. PNM operates its transmission system within a NERC-certified Balancing Authority Area (BAA), monitoring key transmission paths and interconnections to neighboring BAAs to ensure safe, reliable operation.

PNM's transmission system is designed and operated to mandatory and enforceable NERC planning requirements, to meet NERC planning standards. PNM additionally adheres to system operating limits and WECC Path Ratings limits, which define the maximum power flow allowed on elements and interface boundaries to maintain this standard. In most cases, customers should remain unaffected when a single transmission element is temporarily out of service.

In its role as a Transmission Service Provider, PNM serves both retail loads and wholesale customers under its Open Access Transmission Tariff (OATT), pursuant to FERC regulations. Wholesale customers currently account for approximately 50% of transmission system utilization and fall into two categories: Network Integration Transmission Service customers and Point-to-Point Transmission Service customers.

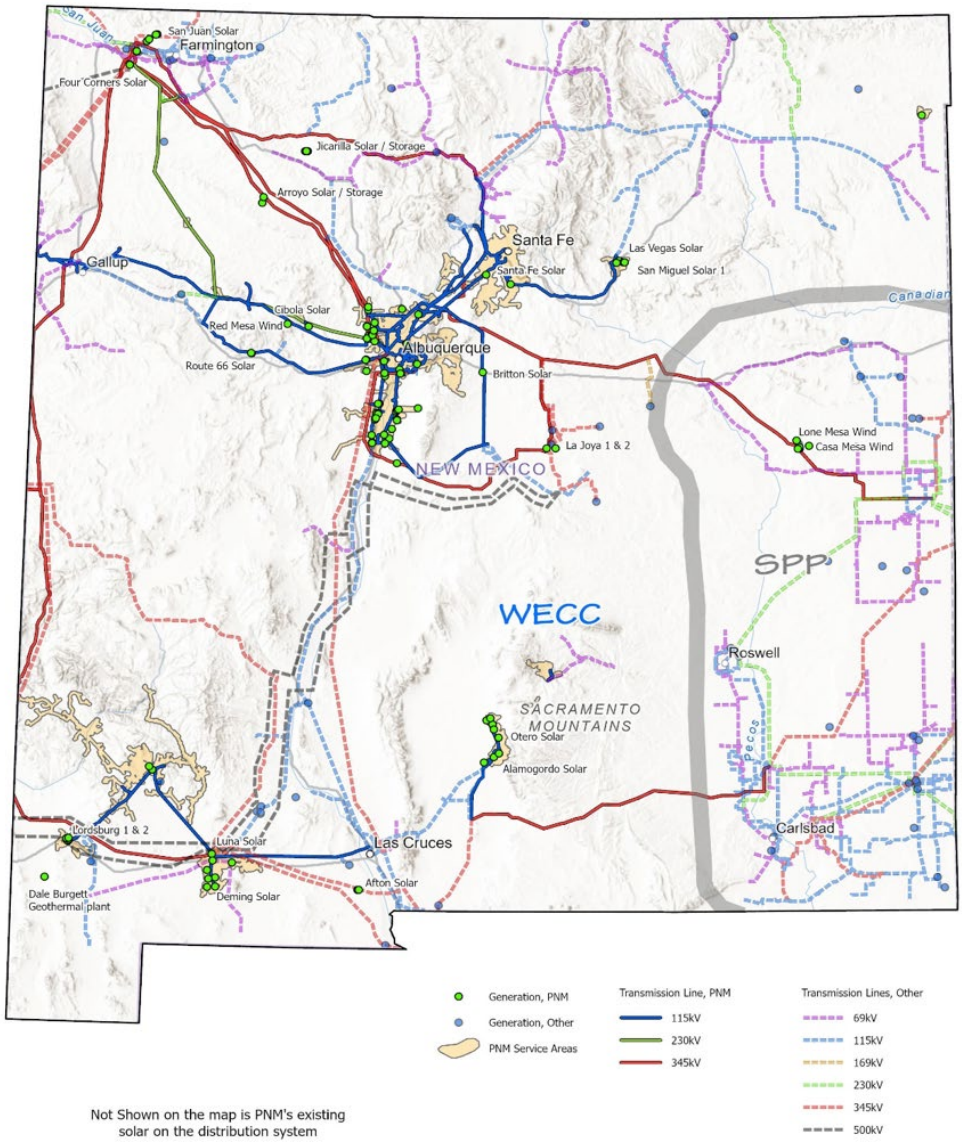
5.1.1 Current System Configuration

Most of PNM's transmission system consists of 345 kV and 230 kV lines built in the 1960s and 1970s, linking the Four Corners area in northwestern New Mexico to load centers in the south and southeast. Power historically flowed from north to south, driven by baseload generation at Four Corners and in Arizona. The growing integration of inverter-based resources (IBR), solar and wind facilities that convert DC generation to AC power, in central and eastern New Mexico has reduced northbound-to-southbound flows and, during periods of low load and high renewable output, has reversed flows from south to north.

In southern New Mexico, PNM jointly owns two 345 kV lines running from eastern Arizona eastward toward El Paso, Texas, on which power has historically flowed eastward and southward. Large autotransformers at load centers step voltage down from 345 kV to 115 kV, and substations on 115 kV, 69 kV, and 46 kV lines further reduce voltages to distribution levels for end-user delivery.

PNM's existing transmission system is shown in Figure 5-1. Its three key elements are: (1) the high-voltage backbone between Four Corners and the north central load center in the Rio Grande valley; (2) the high-voltage lines linking Four Corners with PNM's southern service territory; and (3) the 345 kV transmission lines between eastern New Mexico and PNM's system around Albuquerque recently expanded to support wind resource delivery to and beyond PNM's system. Appendix F provides a full list of PNM's existing and under-construction transmission facilities of 115kV and above, including associated switching stations and terminal facilities as required by the IRP Rule.

FIGURE 5-1. MAP OF PNM'S EXISTING TRANSMISSION SYSTEM



In addition to its own facilities, PNM purchases transmission service from several regional providers to deliver generation to load. These agreements are summarized in Table 5-1.

TABLE 5-1. SUMMARY OF TRANSMISSION SERVICE AGREEMENTS

Service Provider	Transmission Service Description
APS	PNM contracts with APS for point-to-point service to deliver output from PVNGS to PNM's system: a non-OATT bilateral contract for 130 MW and OATT service for 145 MW (both Phoenix to Four Corners).
Tri-State Generation & Transmission	PNM contracts for network service under Tri-State's OATT to serve retail load in the Town of Clayton (approximately 3.5 MW).
El Paso Electric (EPE)	PNM contracts with EPE for point-to-point services to facilitate north-south transfers within New Mexico: 295 MW southbound-to-northbound and 25 MW northbound-to-southbound.
Western Area Power Administration (WAPA)	Under a bilateral transmission exchange: WAPA provides 134 MW (Phoenix to Four Corners) to deliver PVNGS output to PNM; PNM provides 247 MW (Four Corners to various New Mexico delivery points) to WAPA.

PNM's transmission system was originally designed to deliver power from large baseload generators in northwestern New Mexico to load centers across the state. As PNM's portfolio and neighboring utilities transition to more dispersed and diverse renewable resources, system utilization is shifting accordingly. Maintaining, operating, and expanding the transmission system will be essential for integrating new renewable resources and enabling more dynamic participation in Western Interconnection wholesale markets. PNM programmatically provides significant capital investment to address legacy issues in both transmission and distribution.

The subsections below describe current transmission system dynamics, how those dynamics are expected to evolve, and considerations for system expansion as part of PNM's long-term planning.

A key feature of New Mexico's grid geography is that nearly all power serving customers in North Central New Mexico, regardless of where it is generated, must flow across the northern New Mexico transmission system. This includes generation from the Four Corners area, eastern New Mexico resources and southern New Mexico resources routed northward through portions of EPEs facilities. This geographic concentration makes the northern system critical to reliability for the entire PNM service territory.

Northern Load Center

Reliably meeting peak demand in the northern load area requires both the bulk transmission system and locally sited generation resources. The existing transmission infrastructure, at certain times, cannot import enough power from outside the region to meet peak demand, particularly following an unplanned outage of a major transmission element. In that scenario, locally dispatchable generation continues to provide the additional capacity needed to avoid customer outages.

Reeves, Rio Bravo, and the VEF PPA are the primary resources fulfilling this role. Although these facilities typically operate at low-capacity factors, their ability to produce reliable power on demand, and sustain output over extended periods when called upon, makes them indispensable for local transmission reliability during peak periods and following transmission contingencies.

Southern Transmission System

PNM's southern New Mexico system delivers power to multiple jurisdictional service territories, including Deming, Silver City, Lordsburg, Alamogordo, and Ruidoso, as well as to northern New Mexico. The southern system includes three solar facilities and three natural gas generation facilities located at Afton, Luna, and Lordsburg. In addition to PNM's ownership share in WECC-Rated Path 47, a designated transmission path that enables power transfers between the southern and northern parts of the state, PNM purchases transmission service from EPE to serve portions of the Alamogordo area and from Tucson Electric Power to serve portions of the Deming and Silver City areas. PNM also uses EPE and Tucson Electric Power service to move a portion of southern New Mexico generation northward.

The Afton, Luna, and Lordsburg natural gas facilities provide a combined 510 MW of capacity. Because they are located within the WECC-Rated Path 47 transmission boundary, these resources can reliably serve all southern New Mexico loads. When surplus capacity is available, combined transmission rights over PNM, Tri-State, and EPE assets total 345 MW from south to north, allowing this generation to serve northern loads as well.

Currently, southern New Mexico generation is sufficient to serve all PNM loads in the southern system. PNM also holds approximately 75 MW of transmission rights for northbound-to-southbound delivery across the Path 47 boundary, providing flexibility to serve southern loads from northern resources when needed.

Four Corners Area

The transmission lines connecting the Four Corners area to the Albuquerque load center have historically formed the backbone of PNM's transmission system, originally designed to carry baseload output from FCPP and PVNGS to PNM's largest load center in northern New Mexico.

While this corridor's capacity remains essential for meeting peak demand, its utilization has changed significantly as intermittent renewable resources have been added in north central and eastern New Mexico. Greater renewable energy delivery into the north central load pocket has reduced power flows on the Four Corners-Albuquerque segment and, during periods of high renewable output, reversed the historic direction of flow from south to north. This trend is expected to continue. The available transfer capacity on a transmission path above what is currently being used is referred to as transmission headroom; creating headroom is essential for connecting new generation resources.

By 2031, PNM plans to exit the FCPP (200 MW) and as such, there will be times when this existing transmission capacity can support import of alternative resources from the northwestern part of the state.

The transmission no longer dedicated to import SJGS since its retirement has been largely absorbed by the portfolio of solar and storage replacement resources approved by the NMPRC in Docket No. 19-00195-UT. The upcoming retirements of FCPP will provide certain hours where there may be additional headroom to support the next generation of resource additions.

Eastern New Mexico

Development of wind resources in eastern New Mexico has driven significant expansion of the transmission system in that region. Eastern New Mexico benefits from exceptionally high-quality wind resources that have attracted interest from developers and off-takers outside the state. A substantial share of the contemplated new capacity is intended to support the clean energy goals of neighboring western states, demonstrating PNM's role as a regional transmission provider, not just a local utility.

Wind resources currently operating in eastern New Mexico include: 250 MW at Taiban Mesa serving PNM loads; 235 MW at Guadalupe serving Arizona loads; and approximately 790 MW at Blackwater and Clines Corners serving California loads. These facilities interconnect to PNM's 216-mile Eastern Interconnect Project (EIP), the original 345 kV line from the BA 345 kV Switching Station to PNM's Blackwater 345 kV Station near Clovis. An additional 306 MW wind farm at Clines Corners was made possible by the BB2 line, a second 345 kV circuit between Clines Corners and BA Station. Combined, these additions bring total firm transmission service on this corridor to 1,507 MW.

In December 2021, the Western Spirit Transmission Project, developed by Pattern Energy and subsequently acquired by PNM, was energized, enabling interconnection of over 1000 MW of wind resources currently transferred to out-of-state customers. The project was fully subscribed at energization, expanding total wind capacity in eastern New Mexico to nearly 2,400 MW.

West of Albuquerque

West of Albuquerque, approximately 150 MW of existing generation relies on PNM's transmission system to serve PNM and Network Transmission Customer loads in northern New Mexico. With the addition of the Prewitt Escalante Generating Station (PEGS) Solar (Owned by Tri-State Generation and Transmission Cooperative - TSGT) project, this portion of the transmission system is now fully subscribed. PNM has also recently requested approval of its first new 345 kV transmission in the metro area in some time, seeking a CCN for approval of a 345 kV transmission line from Rio Puerco 345 kV to Pajarito 345 kV and terminating in Prosperity 345 kV. Approval is pending.

South of Albuquerque

In Valencia County, south of Albuquerque, approximately 250 MW of existing resources are delivered into the northern load center over the existing transmission system, which is now fully subscribed. The 190 MW Sky Ranch PV solar and BESS project was interconnected in 2024, along with associated transmission upgrades. An additional 100 MW Star Light PV solar and BESS project was energized in 2026 to serve growing large customer loads in the area.

Stakeholder Input: Evaluate Advanced Transmission and Grid Enhancing Technologies

Feedback PNM received from the 2023 IRP, was to include analysis of advanced transmission and grid enhancing technologies as part of future IRPs. PNM agreed to include this topic as part of the 2026 IRP. The following section provides more details regarding how GETs are integrated in PNM's IRP planning process.

5.1.2 Use of Grid Enhancing Technologies

Over the last several decades, PNM has focused on maximizing the capability of its existing transmission system before pursuing major new transmission investments. Through the deployment of GETs the use of remedial action schemes, and other targeted reliability improvements, PNM has been able to increase the utilization and efficiency of its transmission network while maintaining safe and reliable service to customers. This approach has allowed the Company to defer or avoid certain large-scale infrastructure projects, reduce costs to customers, and make more effective use of existing assets. While PNM has been deploying GETs for many years, several new FERC Orders 2023 and 1920 now require the utility industry to consider GETs to ensure low-cost, and timely solutions can be deployed to defer more costly longer-term solutions.

PNM's efforts have been particularly important as the electric grid has evolved to accommodate changing generation resources, increased renewable energy development, electrification trends, and growing customer demand. By leveraging technology and operational innovation, PNM has been able to extract additional capacity and flexibility from its transmission system while continuing to meet reliability, operational, and planning standards.

However, the cumulative effect of these optimization efforts is that much of the latent capacity that once existed on the system has now been utilized. Many transmission facilities are operating closer to their practical physical and planning limits during peak conditions, leaving less flexibility to accommodate new load growth, large new customer interconnections, generation additions, or unexpected system contingencies without additional infrastructure investments. While GETs and operational efficiencies remain important tools, they no longer provide the magnitude of capacity increases needed to address projected future growth on a standalone basis.

As a result, future transmission planning must increasingly balance continued optimization of existing assets with strategic investments in new transmission infrastructure. New transmission facilities will be necessary to maintain reliability, support economic development, facilitate resource and load interconnections, improve system resilience, and ensure that the transmission

network can continue to serve customers efficiently under a wide range of future operating conditions. PNM has largely exhausted the low-cost opportunities to unlock additional capacity from its existing system, making new transmission development an increasingly important component of its long-term planning strategy using GETs.

PNM's GETs deployed to date include:

Line Ratings: Pursuant to FERC Order 881, PNM is deploying Ambient Adjusted Ratings (AARs) to extract additional system capability by adjusting the operational rating of conductor-limited lines based on real-time ambient temperature.

- PNM is also working towards dynamic line ratings which additionally incorporate real-time wind speed and solar irradiance in the transmission line operational rating.
- PNM has installed monitoring equipment to allow for temporary emergency ratings based on actual ambient temperature and wind conditions.
- PNM has increased ratings of transmission lines by using higher wind speed assumptions, where technically justified and cleared several lines for short-duration high-temperature operation during critical conditions.

Power Flow Control: Includes series compensation on transmission lines, phase shifting transformers (PST), and other technology to optimally manage flows on the system.

PNM has deployed the following Power Flow Control GETS solutions:

- Rio Puerco and Abo series compensation – aiding Four Corners to Albuquerque Lines and Western Spirit Transmission Lines
- Belen PST
- Series Reactors at Norton and Belen
- Albuquerque power factor control (RCCS) system
- PNM also utilizes redispatch and battery charge/discharge to control power flows

Topology Optimization: Includes redirection of power to avoid congestion or overloads

Remedial Action Schemes (RAS), which are automated protection schemes designed to increase transmission capacity all over the system – PNM has deployed nearly a dozen of these across the system to maximize transmission capability beyond traditional operational limits.

WEIM participation and future EDAM systems optimize dispatch and transmission schedules across the region, beyond PNM's system.

Advanced planning methods such as hosting capacity, grid strength assessments – both of which are in progress and flow gate analysis which is planned for future operations.

Pursuant to FERC Order 2023, PNM published public-facing, interactive heatmap software in Q3 2025 to inform generation and economic developers on optimal locations to build new generation or loads.

Advanced Conductor: PNM is actively using advanced conductors and evaluating its continued use as part of its 10- and 20-year planning and generation interconnection processes as well as economic development studies – benefits will continue to be unlocked over time as more advanced conductor is deployed across the system.

In 2026, PNM is rebuilding an existing 115 kV line using advanced conductor (ACCC) to optimize line flow capability within existing easements and pole heights and will continue to deploy to maximize capability.

Other: PNM uses Flexible AC Transmission Systems (FACTS) devices which allow for greater utilization of the transmission system

PNM's FACTS include:

- Rio Puerco and Guadalupe Static Var Compensators (SVC): Provide voltage support to maximize the capacity of the transmission system
- Blackwater synchronous condenser: Provides short circuit capability to maximize utilization of existing transmission assets which has allowed for increased wind integration and transfers from eastern NM

PNM will continue to evaluate GETs based on its historical approach and which also align with the requirements of FERC Orders 2023 and 1920, as part of its transmission planning process, identifying opportunities where GETs are feasible to support system needs and facilitate the integration of new resource additions. While much of the readily available latent capacity has already been captured through PNM's extensive GETs deployment to date, PNM will continue to consider GETs, where feasible, as a lower-cost, faster-to-deploy alternative to traditional infrastructure upgrades. This includes when evaluating how best to interconnect and integrate future resource alternatives identified in IRPs. In this IRP, PNM reviewed transmission expansion alternatives requiring GETS technologies to optimize the expansion capacity. The transmission costs used in PNM's zonal model included costs for series compensation needed to control flow to maximize the transfer capability of the system. In nodal modeling, series compensation was modeled for two of the transmission sensitivities reviewed in the IRP. In PNM's transmission planning analysis, the use of advanced conductors has been increasingly explored as a means to increase the ability to deliver resources to load especially where the ability to add new transmission circuits is potentially not feasible.

GETs play an important role in IRP by increasing the capacity, efficiency, and flexibility of the existing transmission system without the need for major new transmission construction. In many cases, GETs can defer or reduce the need for transmission while improving system reliability by increasing system transfer capability.

5.1.3 Future Planning Enhancements – Transition from Rated Path to flowgate methodology

As part of ongoing enhancements to PNM's transmission planning, PNM is evaluating transitioning from NAESB WEQ-023 Rated System Path Methodology (previously MOD-029) to NAESB WEQ-023 Flowgate Methodology (previously MOD-030) in the next few years. These NAESB industry standards methodologies define the requirements for determining available capacity for operation of the transmission system. The Rated System Path Methodology is based on pre-defined, physically negotiated transmission paths with a fixed rating, and the Flowgate Methodology defines flowgates consisting of transmission facilities or interfaces and calculates Available Flowgate Capability (AFC) based on real-time model data, contingency analysis, and actual generation dispatch.

There is the potential for benefits to PNM system and customers expected when transitioning to the Flowgate Methodology versus continued use the Rated System Path Methodology currently in use. Those are expected to include:

- **More Dynamic Representation of Actual Grid Conditions:** Rated-Path ratings are typically based on a single static worst-case operating point, whereas flowgate-based calculations use up-to-date model data and generation dispatch, which can result in a flowgate methodology permitting more transfer between points when prevailing system conditions otherwise leave the flowgate underutilized. That is capacity that a static Rated-Path approach may not otherwise recognize as available.
- **Reduces Curtailment of Resources That a Static Path Rating Would Otherwise Block:** Because Rated-Path capability is fixed regardless of real-time loading, resources might be curtailed for lack of Available Transfer Capability (ATC) on a path even when the specific facilities that could be limiting flows at levels under their reliability limits. A flowgate approach identifies AFC on the specific interface, which can reveal capacity that a path-based calculation would otherwise not recognize.
- **Better Alignment Between Economic Dispatch and Physical Power Flow:** The Rated-Path approach traces a nominal path between a source and sink, but actual power flow on an interconnected AC network is governed by physics, not pre-defined path ratings or contractual values. Power will flow along all parallel paths in proportion to impedance, not just the contracted path, which has been identified as a potential shortcoming of contract- or rated-path methods. In contrast, a Flowgate Methodology directly addresses this by defining boundaries based on actual physical transfer capability between areas rather than using single pre-defined or contractual limits for each line or ATC path.
- **Improved Congestion Management:** By identifying the specific limiting facilities (flowgates) and the "distribution factors" showing how much a given transaction affects each flowgate, transmission providers can more precisely target congestion relief, rather than curtailing an entire path if only one series element may be binding. NERC's MOD-030 standard requires only the most limiting element in a series configuration to be established as a flowgate, avoiding redundant or potentially overly conservative constraints.

- **Industry and Regulatory Trends Support the Shift:** WECC's Path Task Force (2023) and subsequent "Future of Path Ratings" stakeholder workshop (2026) both document that the operational relevance of WECC Path Ratings has diminished substantially over the past decade, driven by:
  - NERC's post-2011 Southwestern Blackout recommendation that WECC reevaluate path-centric operations in favor of tools like Real-Time Contingency Analysis (RTCA).
  - Retirement of TOP-007-WECC-1a (which required operating within Path System Operating Limits).
  - Decoupling of System Operating Limits (SOLs) from Total Transfer Capabilities (TTCs).
  - Retirement of the NERC "MOD A" standards requiring TTC/ATC calculation, replaced by NAESB WEQ-023, under which some entities now calculate Total Flowgate Capability rather than TTC on Rated Paths.

While the 2026 WECC workshop concluded that Path Ratings retain a role primarily in the planning horizon to protect existing transmission investments from erosion by new projects, flow-based methods are increasingly viewed as the more relevant tool for operations-horizon transfer capability.

6. Demonstrated Implementation Precedent: Neighboring entities and major Regional Transmission Operators have formally adopted the Flowgate Methodology for capacity calculations using tools that incorporate real base-case data, generator dispatch, outages, and reservation-level distribution factors. This illustrates that flowgate methodology is a mature, operationally proven approach at scale, not merely theoretical.

Incorporating flowgate-style transmission representation into modeling should allow PNM to more precisely evaluate deliverability of new resources, avoid over- or under-stating transfer constraints relative to a static path rating, and better position the utility to capture the value of GETs and non-wires alternatives as part of an integrated planning approach.

By integrating flowgate methodology into PNM’s operations planning, PNM can utilize information from the flowgate approach to inform the IRP planning and continue to combined benefits of generation, transmission, and demand-side resources, supporting more informed planning decisions that enhance reliability, maintain affordability, and facilitate the transition to a cleaner energy future.

5.2 Distribution System and Distribution System Plan

PNM maintains an extensive distribution system to deliver safe, reliable power from generation and transmission sources to customers' homes and businesses. The distribution system uses overhead and underground conductors connected to substations, which feed electricity through feeder circuits to neighborhoods and commercial areas. Distribution transformers at each service

connection further reduce voltage to usable levels, and meters measure consumption and other delivery attributes at each customer location.

Distribution infrastructure, including transformers, conductors, and meters, requires ongoing investment to accommodate electrification and distributed generation as customer energy profiles evolve. Many of these assets were designed before behind-the-meter customer solar, direct distribution level connected generation (such as Community Solar), EVs, or electrification were anticipated.

PNM addresses the distribution system with overarching goals: enhancing customer satisfaction and system reliability; proactively managing aging assets; and increasing grid resiliency. This long-term asset management plan drives capital investment decisions through project prioritization, alignment with distribution area capacity plans, and field performance reports. Comprehensive investment in aging infrastructure will better position core assets to support New Mexico's decarbonization goals while sustaining customer reliability expectations.

PNM is concurrently preparing its 2026 Distribution System Plan (DSP), to be filed with the NMPRC for the first time on October 1, 2026, pursuant to the Commission's rulemaking in Docket No. 22-00089-UT ("Grid Modernization and Integrated Distribution Planning," 17.9.587 NMAC). The NMPRC adopted this rule to bring transparency and consistency to distribution system planning across New Mexico's jurisdictional utilities, requiring each utility to assess the state of its distribution system, identify potential expansion or upgrade projects, and evaluate grid-enhancing technologies and non-wires alternatives that may improve reliability at a lower cost. PNM's DSP will provide a forward-looking framework for maintaining a safe, reliable, resilient, flexible, and affordable distribution system as customer needs and New Mexico's energy landscape continue to evolve. While the DSP focuses on the planning, operation, and modernization of the electric distribution system, it is closely coordinated with PNM's Grid Modernization Plan. Additionally, PNM continues to link its planning processes to the greatest extent possible; this IRP is connected to the DSP through its evaluation of distribution-sited alternatives in concert with transmission-sited alternatives, consistent with the Commission's directive that distribution and resource planning be evaluated together to identify the most efficient solutions.

Together, these planning processes ensure that generation resources, transmission infrastructure, distribution facilities, and customer-sited technologies are developed in a coordinated manner to reliably and affordably serve customers while supporting state energy policies and economic growth.

PNM currently serves its customers through a distribution system consisting of approximately 197 energized substation transformers providing 4,012.7 MVA of connected nameplate capacity, approximately 17,700 miles of overhead and underground distribution facilities, and approximately 560,000 customer premises. The system also supports more than 48,600 interconnected DER installations totaling approximately 692 MW, primarily customer-sited solar generation. While these resources provide customer benefits and contribute to New Mexico's clean energy objectives, they also introduce new planning and operational considerations, including reverse power flow, voltage management, protection coordination, minimum-load conditions, hosting capacity limitations, communications requirements, and increased system

visibility needs. For a full list of PNM's distribution facilities required by the IRP Rule, please see Appendix F.

The DSP and IRP are increasingly linked through the growing role of DERs, electrification, and customer load flexibility. Historically, distribution planning focused primarily on ensuring sufficient capacity and reliability at the local level. As DER adoption expands and customer behavior becomes more dynamic, distribution planning plays a greater role in determining how customer-sited resources may contribute to broader system needs addressed through the IRP. Going forward, distribution planning can provide future information regarding the location, magnitude, and operational capabilities of distributed resources that may influence future resource requirements, peak demand forecasts, and system flexibility needs evaluated through the IRP process.

Distribution planning identifies where growth is expected to occur, where system constraints on the lower voltage system may emerge, and where customer resources may help defer or reduce infrastructure needs. As these processes continue to mature, these insights can help inform and improve the assumptions used in the IRP and help ensure resource planning reflects actual system conditions and customer adoption trends.

In support of the IRP, the DSP identifies how distribution infrastructure enables the deployment and integration of resources that contribute to meeting ETA objectives and customer demands. Distribution investments create the capability necessary to interconnect renewable resources, community solar projects, energy storage systems, EV charging infrastructure, and other emerging technologies that are increasingly reflected in future resource portfolios considered through the IRP.

Together, the DSP and IRP form a coordinated framework for planning New Mexico's future electric system. The DSP ensures that local distribution infrastructure can reliably deliver electricity and accommodate evolving customer technologies, while the IRP ensures that sufficient generation, storage, and system resources are available to meet future demand. The DSP will provide a comprehensive, forward-looking vision of distribution system needs, identifying future distribution build-out alternatives that can then be incorporated as IRP alternatives, competing alongside other system-wide solutions in future IRPs.

5.3 Grid Modernization Plan

PNM's Commission-approved Grid Modernization Plan is a foundational element of both its DSP and IRP, supporting New Mexico's transition to a carbon-free electric system while maintaining reliability, resilience, and affordability. PNM filed the Plan in October 2022 (Docket No. 22-00058-UT); the Commission's October 2024 Final Order approved the six-year program, now totaling approximately $383 million in capital investment (increased from $344 million per PNM's 2025 annual reconciliation and compliance filing, Docket No. 26-00069-UT).

The Plan addresses growing bidirectional demands on the distribution system — from customer-sited solar, storage, EVs, and new large loads — by deploying AMI, ADMS, DERMS, distribution automation, and enhanced telecommunications/cybersecurity infrastructure, positioning PNM as a real-time distribution system orchestrator. Investments are guided by four objectives: equitable

grid access, enhanced reliability and resiliency, accelerated clean energy integration, and greater customer empowerment.

Implementation is phased: 2025 completed foundational activities (AMI/system-integration contracts, program governance); 2026 begins broad AMI, distribution automation, and ADMS/DERMS deployment; remaining years complete AMI rollout and expand automation, telecom, and cybersecurity capabilities. A complementary distribution battery program (12 MW in service October 2024; 30 MW approved April 2026, in service by summer 2027) illustrates how the DSP, Grid Modernization Plan, and DER integration work together.

Annual Progress Reporting Requirement: Consistent with the Commission's Final Order in Docket No. 22-00058-UT, PNM must file annual review filings with the NMPRC reporting progress on Plan implementation and providing updated cost estimates for the subsequent year; this reporting process repeats annually throughout the six-year Plan.

Together, the DSP, Grid Modernization Plan, and IRP establish a coordinated strategy that positions PNM's distribution system to meet the Energy Transition Act's requirements and support a carbon-free future.

5.4 System Reliability Performance

In addition to the resource-oriented metrics that the IRP tracks, including planning reserve margin, LOLE, and EUE, system reliability is measured using a number of additional metrics.

Maintaining a reliable and resilient electric system is a fundamental objective of PNM's transmission and distribution planning processes. PNM monitors a comprehensive set of reliability metrics to evaluate system performance, identify emerging risks, prioritize infrastructure investments, and assess the effectiveness of operational and planning initiatives. These metrics provide insight into both the frequency and duration of customer outages, the performance of transmission and distribution assets, and the ability of the electric system to withstand and recover from disruptive events.

Distribution Reliability Metrics

PNM utilizes industry-standard reliability indices established by the Institute of Electrical and Electronics Engineers (IEEE) to measure distribution system performance. These metrics are monitored across the system and evaluated over time to identify trends and opportunities for improvement.

System Average Interruption Duration Index (SAIDI) measures the average total duration of sustained outages experienced by customers during a reporting period. SAIDI is a key indicator of overall system reliability from a customer perspective and reflects the effectiveness of system design, maintenance practices, vegetation management, and outage restoration efforts.

System Average Interruption Frequency Index (SAIFI) measures the average number of sustained interruptions experienced by a customer during a reporting period. SAIFI is used to evaluate the frequency of outages and helps identify areas where system reinforcement, automation, equipment replacement, or operational changes may reduce outage occurrences.

Customer Average Interruption Duration Index (CAIDI) measures the average time required to restore service once an outage occurs. This metric evaluates restoration performance and reflects the effectiveness of outage management systems, field response procedures, distribution automation, and system visibility.

In addition to these standardized reliability measures, PNM considers :

- Feeder performance and reliability rankings.
- Substation outage exposure and contingency risks.
- Equipment failures and condition assessments.
- Distribution circuit loading and capacity utilization.
- Customer outages and outage causes.

These metrics support annual distribution planning assessments and help identify infrastructure investments, operational improvements, and grid modernization initiatives that can improve reliability and resiliency.

Transmission Reliability Metrics

PNM maintains and plans its transmission system in accordance with NERC reliability standards and applicable WECC criteria. Transmission reliability assessments focus on maintaining system security under both normal operating conditions and credible contingency events.

Key transmission reliability metrics and planning criteria include:

- **N-1 Contingency Performance**: PNM evaluates the ability of the transmission system to withstand the loss of a single transmission element, such as a transmission line, transformer, generator, or reactive power device, without causing widespread customer outages or unacceptable system conditions.
- **Thermal Loading**: Transmission equipment loading is monitored to ensure transmission lines, transformers, and associated facilities remain within established thermal ratings under both normal and contingency conditions.
- **Voltage Performance**: PNM monitors bus voltages across the transmission system to ensure voltages remain within established operating limits under a range of system conditions and contingencies.
- **System Stability**: Transmission planners evaluate transient, dynamic, and voltage stability performance to ensure the system remains stable following major disturbances and continues to support reliable delivery of electricity.
- **Transfer Capability and Congestion**: PNM assesses available transmission capacity and identifies constraints that may limit the delivery of generation resources or increase operational risk.

- **Transformer and Substation Capacity Utilization**: Loading levels and forecast growth are evaluated to identify locations where upgrades or additional facilities may be required to maintain reliability.

Reliability performance metrics are key inputs to PNM's planning process. While not explicitly modeled in EnCompass™, these metrics flow indirectly through other assumptions used in the database. Distribution metrics guide investments in infrastructure, automation, and AMI that reduce outage impacts and improve service, while transmission reliability assessments identify facility upgrades and reinforcements needed to maintain bulk power system reliability, accommodate changing load patterns, and integrate new generation. Notably, many of these same reliability-driven investments also increase system transfer capability: transmission reinforcements raise path limits and available import/export capacity, while distribution automation, AMI, and grid modernization technologies free up headroom on existing circuits, allowing more power to move across the system without new construction. As PNM transitions to a carbon-free portfolio, reliability metrics further help evaluate the operational impacts of rising renewable generation, storage, electrification, and DERs, with investments prioritized based on their ability to sustain reliability, expand transfer capability, and support clean energy goals. Continuous monitoring of these indicators, paired with near-term operations and long-term planning, allows PNM to deliver safe, reliable, resilient, and affordable service throughout the energy transition.

5.5 Critical Facilities and Infrastructure

PNM maintains contingency resources to ensure reliable service in the event of an unanticipated failure of critical facilities or infrastructure. As PNM's portfolio and physical infrastructure evolve, the nature and profile of system risks change accordingly. To address this, PNM has established a dedicated Crisis Management and Resilience function responsible for identifying and managing rapidly evolving crises that could threaten system reliability, infrastructure integrity, personnel safety, or customer service.

This function operates an enterprise-wide all hazards response plan, an industry-standard framework that prepares the organization to respond to any emergency, regardless of cause. The plan is supported by a business continuity program that establishes protocols for sustaining operations during disruptions. PNM also maintains hazard-specific and business-area-specific response plans, with particular focus on risks that present unique operational challenges:

- Severe storms and extreme weather
- Wildfires
- Cyberattacks
- Pandemics

PNM conducts hazard and impact assessments of its infrastructure using a tiered approach grounded in industry standards and best practices, prioritizing risks that pose the greatest threats to safety, security, and service reliability. PNM also engages with the broader utility industry in support of state and federal preparedness efforts, including disaster planning, grid recovery and

resilience coordination, generation resource adequacy, and fuel supply security. These hazard assessments and resilience considerations are important factors as the IRP process evolves into an ISP process, informing resource and infrastructure decisions that support a reliable and resilient system throughout the planning horizon.

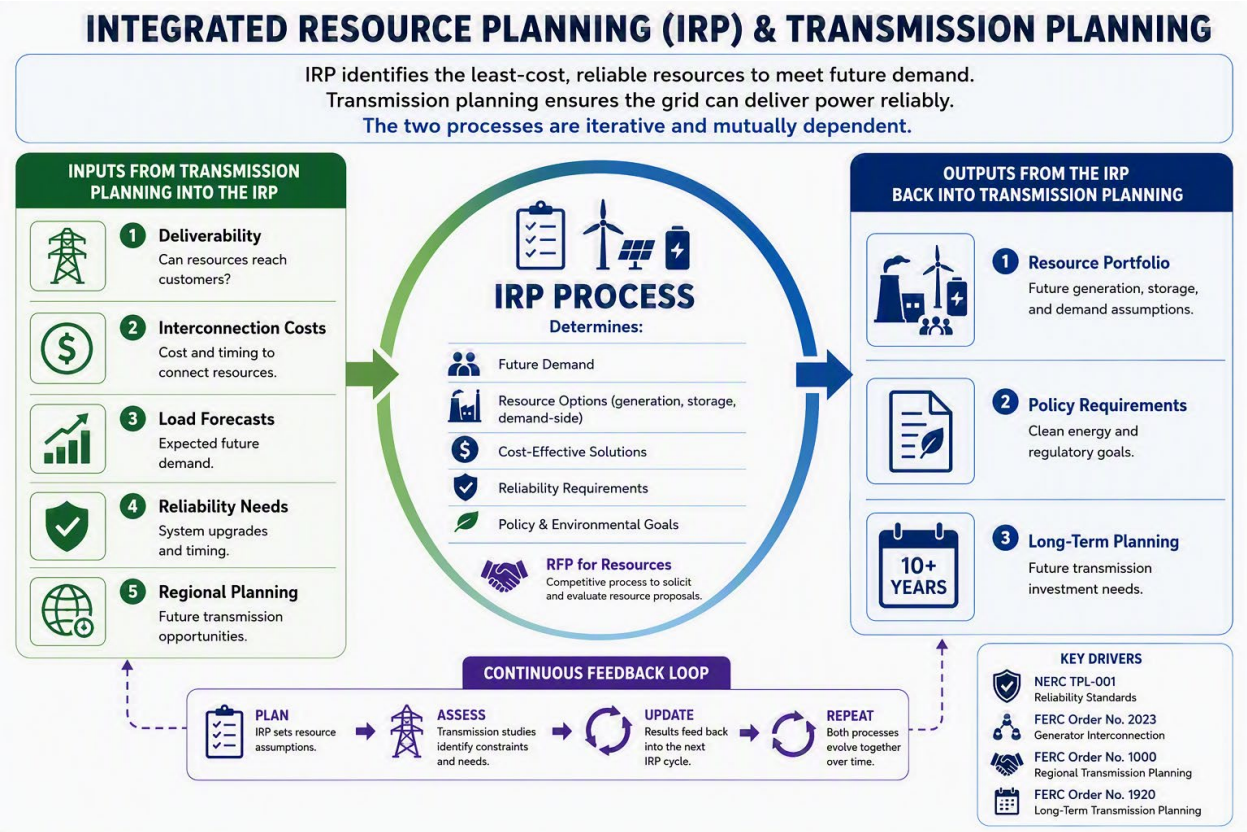
5.6 Today's Transmission Planning Process

Transmission planning is the ongoing, iterative process by which utilities, including Planning Coordinators and Transmission Planners identify the transmission facilities needed to reliably and economically serve future electricity demand, integrate new generation resources, and maintain compliance with mandatory federal reliability standards. In the United States, planning occurs at three overlapping levels: local/utility (Transmission Planner), regional (Planning Coordinator or RTO/ISO), and interregional (coordination among neighboring planning regions pursuant to FERC Orders 1000 and 2023, including the FERC-required interregional cost allocation processes).

5.6.1 How These Functions Feed the Integrated Resource Plan

An IRP is the long-range (20+ year) plan a utility or load-serving entity develops, generally under state regulatory requirements, to identify the least-cost, reliable combination of generation, transmission, demand-side, and storage resources needed to meet forecasted customer demand while satisfying multiple objectives. Transmission planning is not a separate, downstream activity from the IRP; rather, the two processes are iterative and mutually dependent.

FIGURE 5-2. TRANSMISSION PLANNING AND INTEGRATED RESOURCE PLANNING LOOP



The Integrated Feedback Loop

In practice, resource planning and transmission planning create a continuous feedback loop rather than a one-directional pipeline: the IRP's resource forecast (including large loads and new generation) and resource procurement sets the assumptions for the transmission planning assessment; the planning assessment's reliability needs, deliverability findings, and interconnection cost/timing results are then fed back into the next IRP cycle as constraints and cost inputs; and both processes must reconcile with NERC's mandatory reliability standards, FERC's generator interconnection framework, and the fast-evolving large-load interconnection rules, that are reshaping load forecasts and network upgrade obligations as of 2026.

5.6.2 PLANNING HORIZONS AND STUDY CYCLES

Transmission planning is conducted over multiple time horizons, each with different levels of granularity:

- **Near-term / operating horizon (0–2 years):** confirms readiness of facilities already under construction and validates near-term reliability under actual forecasted conditions.
- **Near-term planning horizon (Year 1–5):** detailed power-flow, short-circuit, and stability studies against near-firm load and generation forecasts; typically the basis for capital project approval.

- **Long-term planning horizon (Year 6–10):** scenario-based studies that stress-test the system against a range of future conditions (load growth trajectories, generation retirements/additions, policy scenarios) rather than a single forecast.

PNM Transmission Planners run this cycle annually, producing a formal "Planning Assessment" (the term used in NERC's TPL standard) that is refreshed each year and shared with stakeholders, neighboring systems, and state regulators. Because the Planning Assessment is updated annually, it captures new generation development and transmission service requests affecting system utilization, keeping the analysis current throughout the triennial IRP and RFP planning cycle.

5.6.3 Federal NERC Reliability Standards and Required Studies

Since the Energy Policy Act of 2005, FERC has had authority to approve mandatory, enforceable Reliability Standards for the Bulk Electric System, developed by NERC as the FERC-certified Electric Reliability Organization. Transmission planning is governed primarily by the TPL family of standards, supported by related Facilities (FAC), Modeling (MOD), and Protection and Control (PRC) standards — and these standards directly shape IRP assumptions and constraints.

TPL-001, the cornerstone planning standard, requires each Transmission Planner to perform an annual Planning Assessment covering near-term (1–5 years) and longer-term (10+ years) horizons, studying defined contingency categories (P0–P7) to confirm the system stays within thermal, voltage, and stability limits. When violations are found, Transmission Planners must develop Corrective Action Plans (CAPs) and these CAPs establish firm reliability need-dates that the IRP must treat as binding constraints, or as candidate opportunities for non-wires alternatives if a resource solution can substitute for a transmission solution.

Supporting standards reinforce this link to the IRP: MOD-032 modeling data forms the base cases used in TPL studies (and therefore in IRP deliverability assessments); FAC-001/002, FAC-008/009, and FAC-014 establish facility ratings and System Operating Limits that determine which candidate IRP resources can actually be interconnected and delivered to load; and the PRC-series governs protection coordination that can affect assumed transfer capability.

Beyond NERC standards, FERC orders shape the process by which transmission planning interacts with the IRP: Order 890 requires transparent, comparable treatment of transmission alternatives (including demand-side options); Order 1000 requires regional planning to explicitly consider public policy requirements (e.g., state systems) alongside reliability and economic drivers; and Order 1920 requires long-term, 20-year scenario-based planning — aligning the transmission planning horizon with the IRP's own multi-decade horizon for the first time.

Together, NERC's reliability standards and FERC's planning orders create a continuous feedback loop with the IRP: IRP-selected resource portfolios become inputs to the next TPL-001 Planning Assessment, while that Assessment's reliability needs and deliverability findings flow back into the following IRP cycle as cost and timing constraints.

5.6.4 Planning for Large Loads

Electric utilities across North America are experiencing unprecedented growth in demand from large-load customers, including data centers and advanced manufacturing facilities, among others. These customers can require significant capacity and may seek service on timelines shorter than those historically associated with utility planning cycles. As a result, planning for large loads has become an increasingly important component of PNM's planning efforts.

For PNM, evaluating large-load interconnection requests requires consideration of not only the physical infrastructure needed to serve the customer, but also the broader impacts on system reliability, resource adequacy, affordability, and achievement of New Mexico's clean energy objectives. Accordingly, large-load assessments are often assessed in multiple related planning processes. As these trends continue, planning processes will increasingly require evaluation of multiple load growth scenarios rather than relying solely on deterministic forecasts.

The transmission and distribution plans and the IRP will increasingly be required to provide complementary frameworks for evaluating large-load growth. The Transmission and Distribution planning focuses on the infrastructure, operational, and reliability requirements needed to physically serve new customer demand, while the IRP evaluates the generation, storage, transmission, and demand-side resources necessary to meet long-term energy and capacity needs.

Inputs from large-load inform both planning processes by providing forecasts of future demand, infrastructure requirements, system constraints, and flexibility opportunities. Likewise, grid modernization investments, advanced metering infrastructure, distribution automation, advanced distribution management systems, and distributed energy resource management systems provide the visibility and operational capabilities necessary to manage increasingly complex load profiles.

5.6.5 Transmission Planning for Integrating New Generation

New generation, including wind, solar, battery storage, natural gas, and increasingly hybrid/co-located resources, connects to the transmission system through a distinct but related interconnection process, governed by FERC's pro forma Large Generator Interconnection Procedures (LGIP) and Agreement (LGIA), as most recently and substantially reformed by Order No. 2023.

Typical Generator Interconnection Study Sequence

- **Interconnection request and cluster window**: developer submits site-control evidence, technical data, and required deposits during a defined annual (or periodic) intake window.
- **Cluster study** (feasibility/system impact combined or phased, depending on region): thermal, voltage, short-circuit, and stability analysis of the entire cluster of requests together, identifying needed network upgrades and estimated costs/timing.
- **Cluster restudy**: a follow-on study after projects withdraw or materially change, to reflect the updated cluster composition.

- **Facilities study**: detailed engineering and cost estimates for the specific interconnection facilities and any assigned network upgrades.
- **Generator Interconnection Agreement (GIA)**: the FERC pro forma agreement (as modified by each transmission provider's FERC-approved tariff) establishing the commercial and technical terms, cost responsibility, and milestones for interconnection.
- **Affected systems studies**: parallel studies of any neighboring transmission systems whose facilities may be impacted by the new generation.

These generator studies interact directly with the TPL-001 Planning Assessment described in Section 5.6.3. Network upgrades identified through the interconnection process become inputs to (and, once approved, part of) the base transmission topology used in subsequent regional and long-term planning studies, and vice versa.

5.6.6 Summary

Transmission, distribution, grid modernization, generator interconnection, and resource planning are increasingly interconnected and must be coordinated to effectively plan the future electric system. Forecasted load growth, DER adoption, electrification, and the development of new generation resources all create interactions between these planning processes. Information developed through each planning effort informs the others, helping ensure that resource portfolios are technically feasible, interconnection requirements are understood, grid infrastructure is appropriately sized and located, and customer needs are met reliably and cost-effectively. This coordinated planning approach allows PNM to identify integrated solutions that optimize existing infrastructure, support timely system expansion, and advance the transition to a cleaner and more resilient grid.

Stakeholder Input: More complex and transparent transmission modeling

After the 2023 IRP was filed, stakeholder feedback expressed strong interest in PNM expanding its transmission analysis for the next IRP cycle. Looking to continuously improve, PNM expanded transmission modeling for this IRP using the work performed in the 2023 IRP as a foundation. This section details the steps PNM took to integrate PNM's transmission's planning process into the IRP planning process.

5.7 How Transmission Planning has evolved in IRP Modeling

Transmission modeling in PNM's IRP process over the past couple of cycles has evolved by advancing the methods, organization structure, and internal communication to bring in

transmission information to enhance portfolio optimization. Significant milestones are listed below in the narrative timeline.

PNM's 2020 IRP– First attempt at physical transmission/generation co-optimization. PNM spent months testing a method to represent transmission upgrades as explicit, physical investment choices alongside generation resources, rather than simplified cost adders. The attempt was ultimately unsuccessful, results couldn't reliably demonstrate both reliability and least-cost outcomes, and runtimes were prohibitively long. Ultimately PNM reverted to transmission cost adders for that cycle.

PNM's 2023 IRP – Based on stakeholder review and refinement of the cost-adder approach, PNM revisited transmission modeling methodology with stakeholders across two dedicated workshops, including an external benchmarking comparison against other Western utilities' practices. Feedback and peer review supported continuing with cost adders, which PNM then organized into distinct geographic regions (North, West, East, Load, and generic), each with project-specific unit costs — creating a more structured, transparent basis for translating real transmission projects into planning inputs.

While PNM expanded on modeling in previous IRPs, it was recognized that a large portion of PNM's transmission system utilization was from wholesale transmission service that could not be adequately captured in the zonal modeling tools. PNM began developing a more granular, node-level modeling capability to quantify congestion and better understand interconnection and transmission service implications to IRP defined portfolios laying the groundwork for the detailed resource-to-node mapping used in the 2026 IRP.

PNM's 2026 IRP – Since the filing of the 2023 IRP, PNM has made progress to consolidated planning functions by combining the transmission planning team and the IRP team under the same organization to develop an integrated systems planning (ISP) structure. This change removes the structural barrier between resource planning and transmission planning functions, enabling more coordinated analysis going forward and the ability to provide a more comprehensive transmission analysis in the IRP.

In 2025 PNM completed a first-of-its-kind 20-year transmission planning study (extending beyond the traditional 10-year horizon) to identify transmission solutions. This study fed into the 2026 IRP process through zonal and nodal modeling as discussed in Section 7.3.

Stakeholder Input: Provide potential expansions of transmission connectivity to other utilities and analysis

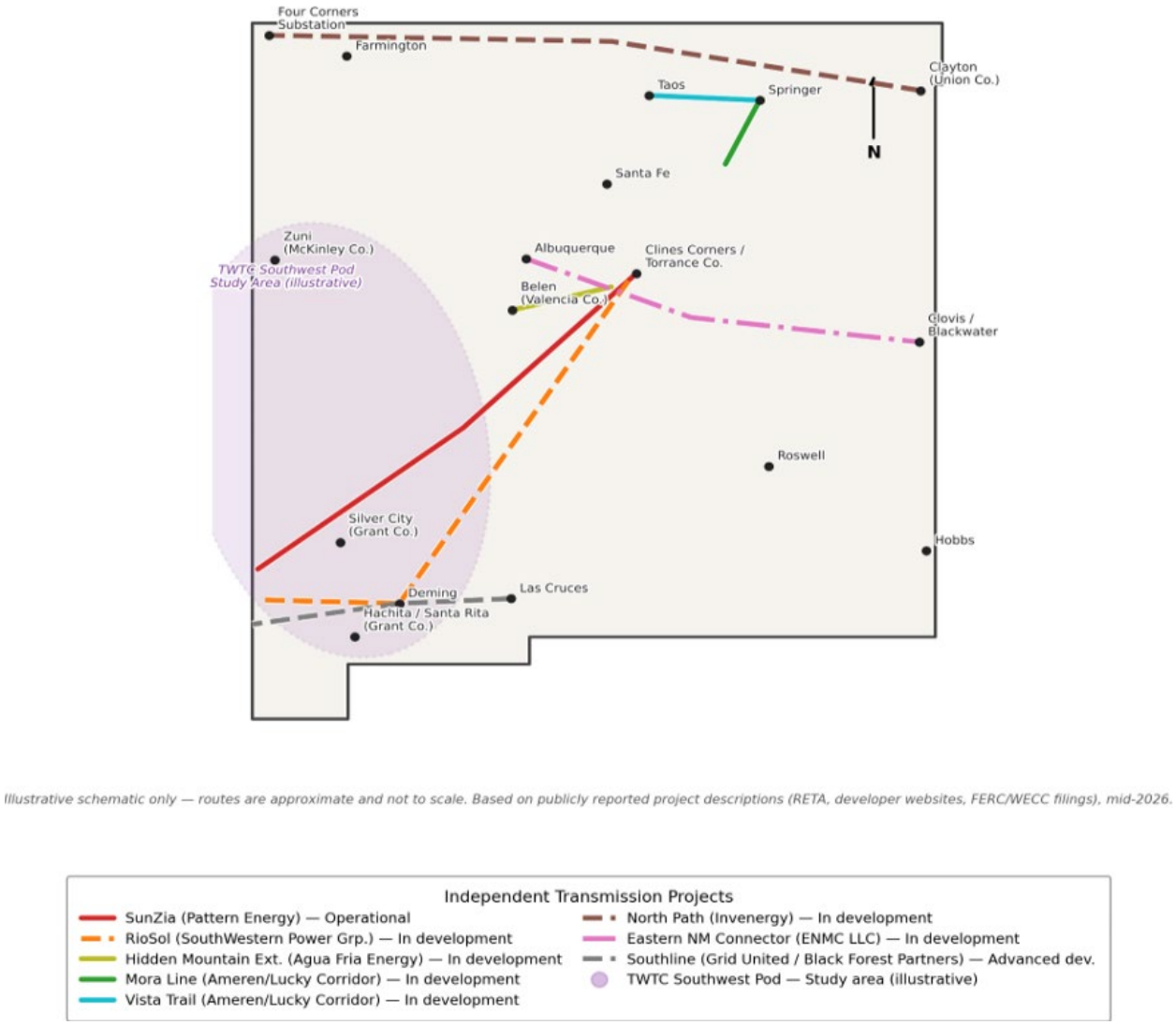
During the 2023 IRP process, stakeholders expressed interest in PNM exploring transmission expansion alternatives in the next cycle to gain access to other utilities. Given the extensive renewable resource development underway in New Mexico, a strong transmission development ecosystem has emerged that can serve as a partner to PNM in constructing future transmission.

5.8 Overview of Merchant Transmission Projects

This section examines merchant transmission projects within the PNM Balancing Authority (BA) area where such connections have the potential to develop. New Mexico's abundant wind and solar resources have attracted a wave of independent (merchant) transmission development. Most of this activity is facilitated through public-private co-development and arrangements with the New Mexico Renewable Energy Transmission Authority (RETA), a state instrument created by the Legislature in 2007 to plan, finance, develop, and acquire high-voltage transmission and energy storage projects that promote renewable energy expansion and economic development in New Mexico.

Tracking independent transmission project development is important to the IRP process because it shows what external developers are constructing to anticipate future renewable resource needs. Each project terminates at different endpoints and therefore connects to different external markets, affecting its value from PNM's perspective. Because building transmission is expensive and time-consuming, partnering with other developers could reduce development time and cost while providing PNM additional transmission capacity to optimize portfolio dispatch. Figure 5-3 below provides a schematic reference map of independent transmission projects in New Mexico.

FIGURE 5-3. MAP OF NEW MEXICO TRANSMISSION PROJECTS



Illustrative schematic only — routes are approximate and not to scale. Based on publicly reported project descriptions (RETA, developer websites, FERC/WECC filings), mid-2026.

Note: Routes are illustrative and approximate, not engineering-grade alignments; consult individual developer/RETA project pages for authoritative routing.

TABLE 5-2. NEW MEXICO TRANSMISSION PROJECT DETAILS

Developer	Project	Length / Type	Capacity	Status (mid-2026)
Pattern Energy Group	SunZia Transmission	550 mi, ±525 kV HVDC	3,000–3,650 MW	Operational – energized June 2026
SouthWestern Power Group (El Rio Sol Transmission, LLC)	RioSol	550 mi (~350 mi in NM), 500 kV AC	1,500–1,600 MW	In development – construction targeted late

Developer	Project	Length / Type	Capacity	Status (mid-2026)
				2026/2027; in-service ~2028–2029
Agua Fria Energy (SWPG affiliate)	Hidden Mountain Extension	~20–21 mi, 345 kV AC	~1,000 MW	In development – lease Oct. 2024; targeted in-service Dec. 2028
Invenergy Transmission	North Path	~400 mi, 525 kV HVDC	Up to 4,000 MW	In development – routing/permitting; targeted ~2032
Ameren Transmission (Lucky Corridor, LLC)	Mora Transmission Project	~115–117 mi, 345 kV / 115 kV AC	182 MW	In development – targeted commercial operation 2027
Ameren Transmission (Lucky Corridor, LLC)	Vista Trail Transmission Project	~65 mi, 345 kV AC	~850 MW	In development – route selection phase; targeted 2027
Eastern New Mexico Connector, LLC	Eastern New Mexico Connector	278 mi, up to 500 kV AC	3,200 MW	In development – lease approved Dec. 2025; phased through ~2032
Grid United & Black Forest Partners	Southline Transmission Project	~280 mi, double-circuit HV AC	Bidirectional (N/A)	Advanced/pre-construction – construction expected late 2026; Phase 1 ~2028, full ~2029
Western Transmission Consortium (TWTC) – 84-member multi-state utility consortium incl. PNM	Southwest Pod (Blue Bird, Hachita, Santa Rita, Elkhorn, Zuni)	~1,100–2,000 mi across AZ, CO, NV, NM, UT (aggregate); NM-specific mileage not yet published	Not yet published	Initial study phase – project companies launched Aug./Sep. 2025; routes/timelines to be determined

Detailed Project Descriptions

1. Pattern Energy Group — SunZia Transmission (Operational)

SunZia is the largest clean-energy infrastructure project in U.S. history — a 550-mile ±525 kV HVDC line connecting central New Mexico (Torrance, Lincoln, and San Miguel counties) to south-central Arizona, paired with the 3,650 MW SunZia Wind farm. After nearly two decades of development, the project became fully operational in June 2026, delivering up to 3,000–3,650 MW and an estimated $20.5 billion in total economic benefit to New Mexico and the Southwest. It uses Hitachi Energy's HVDC Light® Voltage Source Converter technology — one of the largest VSC-based HVDC installations in the world.

2. SouthWestern Power Group / El Rio Sol Transmission, LLC — RioSol (In Development)

RioSol is effectively “Line 2” of the original SunZia project concept (SWPG retained this line after selling Line 1 to Pattern Energy in 2022). It is a 550-mile, 500 kV single-circuit line (~350 miles in New Mexico) co-located with SunZia, rated at 1,500–1,600 MW. RioSol completed an open capacity solicitation in 2025 and received FERC negotiated-rate authority. Construction is expected to begin in late 2026/2027, with commercial operation targeted for 2028–2029. A 2024 economic study projects $2.4 billion in project investment and $1.17 billion in regional economic benefit.

3. Agua Fria Energy — Hidden Mountain Extension (In Development)

A SWPG-affiliated developer building a ~20-mile, 345 kV multi-circuit line connecting RioSol's planned Tom Ray substation to PNM's existing Hidden Mountain substation in Valencia County, unlocking renewable capacity from Torrance and San Miguel County wind/solar projects. RETA entered a lease agreement in October 2024, with in-service targeted for December 31, 2028.

4. Invenergy Transmission — North Path (In Development)

A proposed ~400-mile, 525 kV HVDC line connecting northeastern New Mexico (Union County) to the Four Corners region in northwestern New Mexico, rated at up to 4,000 MW. Invenergy is co-developing with RETA under a January 2023 joint development agreement. The project remains in the routing, permitting, and community-engagement phase — including briefings to county commissions and coordination with Tribal governments — with expected completion around 2032.

5. Ameren Transmission (Lucky Corridor, LLC) — Mora Transmission Project (In Development)

A combination of a ~47-mile 345 kV segment (Don Carlos Wind Farm to a new Mora/Springer-area substation) and a ~66–70-mile 115 kV segment (Springer to PNM's Arriba substation), totaling roughly 115–117 miles and delivering 182 MW of wind power. Estimated project cost is $83 million, with commercial operation targeted for 2027; design work is reported to be substantially complete.

6. Ameren Transmission (Lucky Corridor, LLC) Vista Trail Transmission Project (In Development)

A proposed ~65-mile, 345 kV AC line between Tri-State's Taos and Springer substations (~850 MW), intended to serve Clearway Energy's Gallegos/Don Carlos wind development and deliver power toward the Four Corners trading hub. The project remains in route-selection and stakeholder-engagement phase, with commercial operation targeted for 2027.

7. Eastern New Mexico Connector, LLC (In Development)

A newly formed developer (organized in New Mexico in October 2025) co-developing a 278-mile, up-to-500 kV double-circuit AC line with RETA, connecting PNM's Blackwater, Taiban Mesa, Hidden Mountain, and Pajarito substations at a rated capacity of 3,200 MW. The lease agreement was approved in December 2025; the project will be built in five phases, with renewable interconnections targeted for 2032.

8. Grid United & Black Forest Partners — Southline Transmission Project (Advanced Development)

An approximately 280-mile, double-circuit high-voltage line connecting the El Paso and Tucson transmission systems in two phases (Pima County, AZ → Grant County, NM → Doña Ana County, NM). Southline has completed NEPA review, obtained major state/federal permits, and secured 100% of private land rights in New Mexico. It was selected by the U.S. Department of Energy for the Transmission Facilitation Program (combined capacity contract value exceeding $700 million). Construction is expected to begin in late 2026, with Phase 1 operational by 2028 and the full project by 2029.

9. Western Transmission Consortium (TWTC) — Southwest Pod (Initial Study Phase)

The Western Transmission Consortium (TWTC) is a pioneering, member-owned entity — distinct from the single-developer IPP projects above — dedicated to building interregional and interjurisdictional transmission infrastructure across the eleven western states. TWTC officially launched its operational phase in May 2025 with founding members representing 84 utilities across 11 western states, including PNM as a founding member. Unlike the merchant developers described above, TWTC itself will not own transmission assets; instead, it forms individual project companies as specific opportunities are curated, with member utilities and independent transmission companies syndicating investment on a case-by-case basis.

TWTC's Southwest Pod consists of eight to nine transmission projects spanning approximately 1,100–2,000 miles across Arizona, Colorado, Nevada, New Mexico, and Utah. Five projects — named after historic turquoise mines in the Southwest (Blue Bird, Hachita, Santa Rita, Elkhorn, and Zuni) — launched their initial study phase in August/September 2025. The Hachita, Santa Rita, and Zuni project names reference locations in Grant and McKinley counties in southwestern New Mexico, suggesting a New Mexico nexus for at least a subset of these projects, though TWTC has not yet published specific routes, capacities, or in-service dates for individual Southwest Pod projects.

Because TWTC is a regional utility consortium rather than a merchant transmission developer, and because individual Southwest Pod project routes remain under study, the map in Figure 5-3

shows only a general, illustrative study-area indicator for the Southwest Pod rather than a specific route line. This should be treated as directional only and updated once TWTC publishes project-specific routing.

5.8.1 Modeling Transmission Candidate Transmission Projects in the 2026 IRP

The 2026 IRP transmission project sensitivities are not a random assortment of candidate projects — they represent four distinct connections to the outside world, chosen to evaluate different regional market-access and the ability of the PNM system to accommodate associated transfers.

Table 5-3. 2026 IRP Candidate Transmission Projects

Project	Direction	Market Being Tested	Interconnection Type
Blackwater Connection to SPP	East	Southwest Power Pool (SPP)	AC/DC/AC asynchronous tie
Rio Puerco – Four Corners Connection	Northwest	Ties into Arizona neighbor systems.	Synchronous AC (within WECC)
Rio Sol Connection	Southwest	Arizona / Desert Southwest market	Synchronous AC (within WECC)
SunZia Connection	East-central	CAISO (via the SunZia line)	Synchronous AC (within WECC)

PNM's modeling of these connections is very high level, and flows are largely based on price differentials with near-by interconnections. While some insights are provided including potential interaction with PNM's resource portfolio, substantial additional study work would be needed to quantify the benefits and challenges of these projects. See Section 9.3 for analysis.

5.8.2 Summary

Ultimately, the pace, cost, and reliability of PNM's transmission system will influence PNM's resource portfolio planning and IRPs. As FERC's Order No. 1920 recognizes, transmission planning can no longer be treated as a downstream consequence of resource decisions — it must be conducted concurrently, on a long-term, scenario- basis, so that PNM and its stakeholders can see, well in advance, where new generation, storage, and large-load additions are likely to require network upgrades. This forward-looking, integrated approach to transmission planning is not simply a compliance exercise — it is foundational to PNM's ability to deliver reliable, resilient, and affordable service to customers over the 20-year planning horizon. As load growth accelerates, merchant projects are advanced, and the resource mix continues to diversify, PNM will continue to pursue the full range of tools available — from GETs and right-sizing of existing facilities to targeted new transmission investment to potential strategic merchant development partnerships — to ensure that the transmission system keeps pace with the resource additions this IRP identifies, while protecting customers from unnecessary cost and preserving the reliability New Mexicans depend on.

6. Reliability & Resource Adequacy

Chapter Highlights

1. PNM's resource adequacy needs are evolving as load grows and its resource mix changes, with reliability risks shifting from summer peak periods toward evening, overnight, and potentially winter periods.
2. PNM's 2026 Resource Adequacy Study establishes a 14.5% Planning Reserve (PRM) to maintain the industry-standard reliability target of 0.1 loss-of-load days per year.
3. Firm dispatchable resources remain an important component of a reliable portfolio as renewable and storage penetration increases, particularly during sustained periods of low renewable production and multi-day extreme weather events.
4. The Southwest has maintained adequate resources in the near term, but rapid regional load growth will require a historically high pace of new resource additions, potentially limiting PNM's ability to rely on market purchases during stressed conditions.

The provision of reliable electric service is a core element of PNM's obligation to serve its customers. Electricity supports essential daily needs, including heating and cooling buildings during extreme weather, charging vehicles, operating businesses, and powering communications, data, water, public safety, and other infrastructure that increasingly depends on continuous electric service.

This chapter describes the connected planning and operating functions PNM uses to maintain reliability, explains how resource adequacy needs are changing as load and the resource mix evolve, and summarizes how this IRP uses probabilistic loss-of-load-probability modeling, effective load carrying capability (ELCC) analysis, and PRM requirements to test whether candidate portfolios can reliably serve customers under a broad range of system conditions.

6.1 Elements of Reliability

Reliability is delivered through multiple connected planning and operating functions. PNM must plan for sufficient generation, transmission, and distribution infrastructure; maintain those assets to ensure their performance; operate the system in real time; and coordinate those activities across the path from the point of generation to the customer meter. Each function addresses a different aspect of reliability: generation planning evaluates whether the portfolio can meet customer demand under a range of system conditions; transmission and distribution planning evaluate whether power can be delivered where and when it is needed; and operations maintain service as load, weather, equipment availability, and market conditions change.

The IRP is focused primarily on the resource-planning function, but it cannot be interpreted in isolation. A portfolio that appears adequate from a capacity perspective must still be deliverable across the transmission and distribution system, and operating reliability depends on having

sufficient dispatchable, flexible, and responsive capability available in the time frame in which system conditions change.

6.1.1 Generation Planning & Resource Adequacy

Maintaining resource adequacy means planning for a portfolio of supply-side, demand-side, and market resources that can serve customer demand under stressed but plausible combinations of load, weather, resource availability, forced outages, and market conditions. Standards for measuring resource adequacy vary by jurisdiction, but a common industry benchmark is the one-day-in-ten-year reliability standard, typically measured by a LOLE of 0.1 days per year.

Establishing how much capacity is needed, when it is needed, and which resource attributes can meet that need is a central function of this IRP. The IRP identifies resource needs and informs the Statement of Need; subsequent procurement and approval processes determine whether specific resources are proposed, selected, contracted, approved, and placed in service.

To plan for resource adequacy, PNM maintains a PRM requirement. Resources are counted towards this requirement based on their ELCC, a technology-agnostic measure of their contribution towards reliability needs that accounts for each resource's specific capabilities and limitations. Consistent with industry best practice, both the requirement and capacity contributions are derived directly from detailed loss-of-load-probability (LOLP) modeling, described in greater detail in Section 7.3.

6.1.2 Transmission Planning

PNM plans its transmission system through ongoing 10-year and 20-year transmission planning processes that evaluate whether the existing and planned grid can reliably serve forecasted customer demand, integrate new generation, and accommodate changes in load over near-term and longer-term planning horizons. These processes use transmission models, load forecasts, generation and retirement assumptions, known interconnection activity, and planned system topology to test the system under normal and contingency conditions. The studies identify potential thermal overloads, voltage violations, stability concerns, short-circuit duty issues, protection-system limitations, or other deliverability constraints that could affect reliable service.

When a reliability need is identified through transmission planning, PNM evaluates corrective actions such as transmission upgrades, operating procedures, or potentially non-wires alternatives where applicable. The planning process is iterative: transmission studies inform resource planning by identifying deliverability limits, interconnection costs, construction schedules for upgrades, and upgrades required for reliability. IRP models assumptions about future load, generation, storage, and retirements within the capacity expansion planning model where resources are optimized in conjunction with the transmission information. PNM Transmission then takes the resultant optimization and places it into their transmission model to feed the next iteration of the planning process.

6.1.3 Distribution Planning

Distribution planning addresses the local infrastructure needed to deliver electricity from the transmission system and distributed resources to customers. It evaluates feeders, substations, voltage performance, protection systems, equipment loading, customer growth, distributed energy resource adoption, transportation and building electrification, resilience needs, and local reliability performance. Distribution planning occasionally has to relocate loads from one substation to another thereby affecting its off-take point on the transmission system which could affect reliability on the transmission system. This handshake between transmission planning and distribution planning happens annually when study models are built to include distribution planning activities and ensure these activities are reflected in transmission models.

6.1.4 Operational Reliability

As a balancing authority area, PNM is responsible for maintaining balance between generation and load in real-time operations. PNM operates the electric system subject to applicable NERC and WECC reliability standards and coordinates reserves, dispatch, interchange, and market activity to respond to normal variability and unexpected events.

Operating reserves refer to capacity not used to serve load that can be dispatched by operators in response to variations in conditions or unforeseen events. In accordance with NERC standards, PNM's operators maintain operating reserves for two purposes:

- **Contingency reserves** are used to respond to unexpected changes in the system, for example, unplanned outages of a generator or transmission line. In the Western Interconnection, NERC/WECC standards require that BAAs maintain contingency reserves equal to (1) 3% of PNM load plus 3% of online generation, or (2) the single largest contingency on PNM's system,[26] whichever is greater.
- **Regulation reserves** are used to respond to second-to-second variations in PNM's load and renewable generation output. For example, PNM maintains 13.8 MW[27] of regulation reserves, on top of the contingency reserves, for fast frequency response in compliance with NERC Standard BAL-003-1

Participation in Western Power Pool Reserve Sharing Group (WPP RSG) enables its 30+ member utilities to share contingency reserves, allowing for more efficient, cost-effective dispatch. In the event of an imbalance on PNM's system requiring contingency reserves, PNM may provide or receive assistance from the WPP RSG to meet contingency reserves for a maximum of one hour, during which PNM must restore balance to the system.

[26] Currently, PNM's largest contingency is the 300 MW Arroyo solar or Atrisco solar facility. As PNM's portfolio evolves over time, the single largest contingency may change to a different generator or transmission asset.
[27] Regulation requirements are expected to change due to increased renewable penetration and energy limited resources installed on the PNM system. During the 2026 IRP, regulation requirements were undergoing review and potential changes.

Operating reserves held by PNM may be spinning – meaning that they are provided by resources that are already synchronized to the grid – or non-spinning – meaning that they are not currently operating but can start within a ten-minute period. PNM uses both spinning and non-spinning reserves to meet the contingency and regulation requirements described above.

TABLE 6-1. OPERATING RESERVES HELD BY PNM IN REAL-TIME OPERATIONS

	Contingency Reserves	Regulation Reserves
Purpose	Respond to unforeseen events	Balance normal variations
Typical Requirement	Greater of (1) 3% of load and 3% online generation or (2) single largest contingency	13.8 MW
Contributing Resources	Spin, non-spin, and WPP RSG participation	Spin

PNM is also required to account for flexibility requirements associated with participation in the CAISO WEIM. CAISO's resource sufficiency evaluation includes a flexible ramp sufficiency test, a bid capacity test, balancing test and feasibility test; if a balancing area fails any test, transfers between that balancing area and the rest of the WEIM may be limited. These requirements are distinct from long-term resource adequacy and contingency-reserve planning, but they reinforce the same portfolio design principle: resources must be capable of serving energy and capacity needs in the time frames in which reliability risks emerge.

6.1.5 RESILIENCE

Climate change, and associated extreme weather events, present an emerging risk to reliability, driving an increased need for planning resilient power systems. In the west, this has materialized as increases in the intensity and frequency of extremes. Recent examples of these extreme weather events include the 2020 and 2022 west-wide heatwaves and 2021 Winter Storm Uri. Although extreme weather events are expected to intensify in the coming decades, significant uncertainty surrounding their frequency, duration, and severity makes them challenging to incorporate into planning and modeling efforts.

TABLE 6-2. INTEGRATION OF KEY LESSONS FROM THE RESILIENCE STUDY INTO THE CURRENT PLANNING PROCESS

Resilience Study Finding	Reflection in PNM's Current IRP
Different resource portfolios that meet the same LOLE planning standard exhibit varying performance during extreme events.	While PNM plans its portfolios to target a specific LOLE standard, alternative reliability metrics (expected unserved energy, loss of load hours) are evaluated and reported.
Stress testing candidate portfolios for resilience can help identify differences in their performance.	As a final step in the portfolio evaluation process, PNM reproduces several of the stress tests created in the resilience study and tests portfolios under those specific events.

Resilience Study Finding	Reflection in PNM's Current IRP
Weatherization of all generation resources to allow for performance under extreme conditions provides additional resilience	Cost assumptions for all new resources are intended to reflect necessary weatherization measures.
Firm generation resources reduce the severity of extreme event impacts in both summer and winter.	The IRP evaluates an expansive range of firm resource options, including emerging technologies not previously considered in the IRP.
Broader southwest dynamics will have significant impact on PNM's ability to avoid outages under winter extreme events.	For the LOLP analysis, PNM and PowerGEM have updated the representation of neighboring electric systems to capture more realistic, expected future changes in loads and resources.
As PNM expands its energy storage portfolio, its operational limits and utilization should be understood and considered in resource adequacy modeling.	PNM incorporates a forced outage rate for battery storage into its reliability modeling that is consistent with actual regional performance data.

6.2 Regional Outlook & Industry Trends

6.2.1 Regional Load-Resource Balance

Both PNM's 2020 and 2023 IRPs identified growing concerns regarding regional resource adequacy as an important trend to monitor. As documented in both IRPs, a confluence of factors – increasing loads, aging plant retirements, and increasing frequency of extreme weather – contributed to growing reliability risks at the time. During this period (2020-2023) NERC's Summer Reliability Assessments classified the Southwest US as experiencing elevated reliability risks.

Since this time, more recent publications provide updated viewpoints on regional resource adequacy, including NERC's *2026 Summer Reliability Assessment*[28]and E3's *2025 Resource Adequacy Assessment: Desert Southwest* (2025 Southwest RA Study).[29] Both studies indicate that the region's utilities have successfully maintained resource portfolios sufficient to meet growing loads. NERC's assessment now classifies the Southwest as experiencing normal levels of summer reliability risk, and the 2025 Southwest RA Study similarly notes:

> *"Since 2021, observed resource additions in the Southwest have largely aligned with projections from five years ago. While load growth has slightly outpaced prior forecasts, the region has largely maintained a stable balance of loads and resources during this period."*

At the same time, both studies warn of potential future resource adequacy challenges and the need for significant new resource investments to maintain adequacy. NERC's assessment warns

[28] "Summer Reliability Assessment: Western Overview." NERC. 2026. Available at https://feature.wecc.org/2026-sra/index.html

[29] "2025 Resource Adequacy Assessment: Desert Southwest." E3. May 2026. Available at: https://www.ethree.com/wp-content/uploads/2026/05/E3-SW-RA-Report_May-2026.pdf

that "The subregion faces grid reliability concerns posed by large loads if new generation resources are delayed as new load comes online," and E3's study quantifies the scale of new resource needs across the region required to mitigate those challenges:

> *"Meeting the needs forecasted in this study would require that utilities add over 4,000 MW of new installed capacity to the system each year over the next decade – a quantity that exceeds the necessary rate of additions previously identified in the 2021 study and eclipses the long-term historical average by a factor of four."*

In addition to driving procurement of new resources, the region's growing capacity needs have also prompted utilities to reevaluate plans to retire aging baseload generators. In the past two years, several of the region's largest utilities have announced plans to convert coal-fired power plants to natural gas rather than retire them, preserving the firm capacity those resources provide. Announced plant conversions announced:

- Coronado Units 1 and 2 (762 MW), previously scheduled for retirement by 2032, now planned for conversion to natural gas by 2030;
- Springerville Units 1, 2, and 4 (1,193 MW), previously scheduled for retirement at various points, now planned for conversion to natural gas by 2030; and
- Cholla Units 1 and 3 (380 MW), retired in 2025 and now planned for repowering by 2029.

Together, these plants represent over 2,000 MW of capacity previously scheduled for retirement.

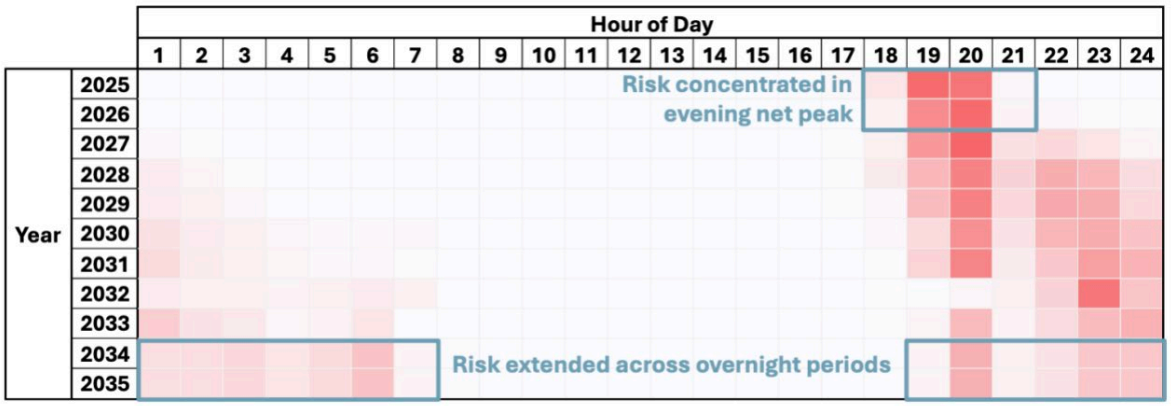
6.2.2 Shifting Reliability Risks

Challenges to system reliability are also evolving as the resource mix changes. Historically, reliability planning focused on ensuring sufficient capability to meet demand during peak periods. Rapid increases in the penetrations of variable resources – particularly solar – across the region cause the periods of highest reliability risk to shift into the net peak period, which typically occurs during the evening hours or after sunset.

E3's 2025 Southwest RA Study provides an indication of how these patterns may change over the next decade. Figure 6-1, reproduced from that report, shows the year-by-year progression of relative reliability risks by hour of the day across the region based on utilities' recent resource plans. Several observations are notable and relevant to PNM's planning:

- **Near-Term (Current Risk):** Due to the large-scale of additions of solar resources, the greatest reliability risks in the region have already shifted to the early evening hours.
- **Medium-Term (Storage Exhaustion):** Within the next several years, as the penetration of storage resources increases, risks may begin to materialize even later in the nighttime period on days when the state of charge from those resources is exhausted.
- **Long-Term (Energy-Constrained System):** By the mid 2030s, utilities' continued additions of renewables and storage will result in risk periods that span the entirety of the overnight period, reflecting a system that is energy-constrained outside of daylight hours.

FIGURE 6-1. SHIFTING RELIABILITY RISK BY HOUR OF DAY IN THE SOUTHWEST REGION, 2025-2035[30]



This regional progression closely mirrors the risk evolution identified in PNM's planning. As described in PNM's 2023 IRP:

> *"Today, the most prevalent periods of reliability risk (or loss of load risk) occur in the late summer evenings, as the sun sets and demand for power is still high. As the system evolves, these patterns of loss of load risk will start to shift later in the evening and eventually may migrate to the winter season."*

This parallel has several direct implications for PNM's planning:

- **Operational Alignment:** The seasons and hours of day when PNM faces heightened reliability risks closely align with the region's broader reliability risk profile. Consequently, PNM's tightest load-resource periods coincide with periods of peak wholesale market prices and reduced market liquidity. Maintaining planning assumptions that limit over-reliance on unspecified market purchases will be essential to protecting customers from reliability and cost exposure.
- **Analytical Rigor:** Employing probabilistic modeling across all hours of the year (a practice PNM has maintained since its 2017 IRP) is widely recognized as industry best practice and remains critical for robust long-term planning. Aligning need determination and resource accreditation methodologies (such as ELCC) with this framework ensures the identification of least-cost portfolios that fully satisfy PNM's near- and long-term reliability requirements.

These dynamics highlight the importance of a resource adequacy planning paradigm that accounts for risks that may occur at all times of the year and not only during the historical peak period.

[30] "2025 Resource Adequacy Assessment: Desert Southwest." E3. May 2026. Available at: https://www.ethree.com/wp-content/uploads/2026/05/E3-SW-RA-Report_May-2026.pdf Reproduced with permission.

6.2.3 Extreme Weather Event Risk

While hourly loss-of-load risk modeling captures expected seasonal and diurnal shifts, extreme weather events present compound, high-impact risks that challenge system adequacy beyond standard planning assumptions. Extended heatwaves, multi-day winter freeze events, and widespread, persistent periods of low solar and wind availability simultaneously drive peak customer demand while curtailing generation output across the Desert Southwest.

- **Multi-Day Energy Deficits**: Extreme temperature events frequently correlate with extended periods of low wind and solar irradiance. During these conditions, variable clean generation drops significantly across wide geographic areas, preventing short-duration storage (such as 4-hour BESS) from fully recharging over consecutive days. As storage state-of-charge is depleted, the system transitions from a short-term capacity constraint to a sustained multi-day energy shortfall.
- **Correlated Regional Strain & Market Illiquidity**: Because extreme heat domes or widespread winter freezes impact the entire Southwest region simultaneously, regional market headroom diminishes during the critical periods when PNM faces its tightest operating margins.
- **Fuel and Thermal Supply Risks**: Severe weather can also impact the availability and performance of conventional supply assets. Cold-weather operational derates, ambient temperature limits on combustion turbines, and fuel supply delivery constraints can reduce available capacity just as load demand spikes.

These severe, weather-driven compound risks underscore the limits of relying solely on variable generation and short-duration storage for resource adequacy. Mitigating exposure requires planning criteria that evaluate multi-day weather stress scenarios, ensuring the portfolio retains sufficient firm, weather-resilient dispatchable capacity to maintain grid stability during sustained, widespread climate extremes.

6.2.4 Importance of Firm Resources

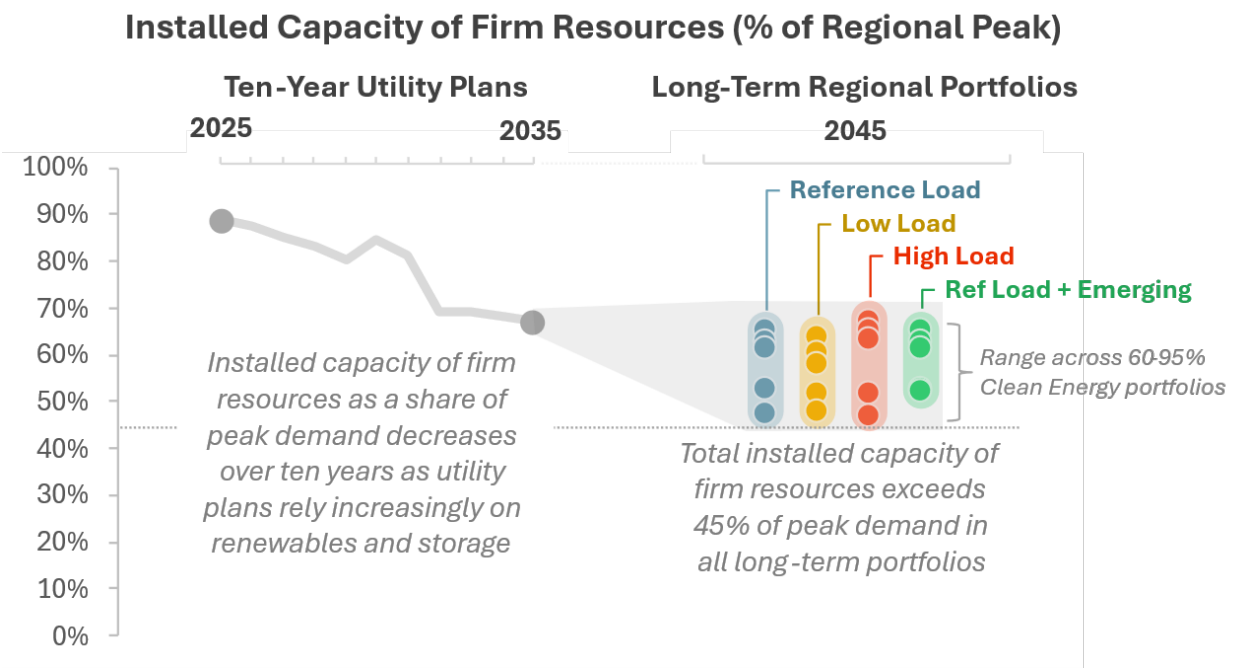
The shifting risk profile and the declining marginal value of renewables and storage has an important corollary: to ensure reliability even during extended periods of low renewable production, some form of firm generating resource (a resource capable of generating at full capacity over sustained periods of time) is needed as a complement to renewable and short-duration storage resources. This tenet is one of the key findings of E3's 2025 Southwest RA study:

> *"Firm generation resources remain essential to ensuring long-term resource adequacy. Even as renewables and storage serve growing energy needs, their firm capacity contributions decline over time as more are added to the system. To mitigate the risk of energy deficiencies during periods of low renewable output, firm resource options capable of producing energy on demand across sustained periods are necessary."*

Figure 6-2, reproduced from E3's study based on detailed reliability analysis of the Southwest region, provides a useful indication of the scale of potential long-term firm resource needs: across a range of long-term load forecasts and resource mixes – including penetrations of carbon-free

resources reaching 95% of annual energy demand – the installed capacity of firm resources needed to ensure reliability varies between 45-70% of peak demand.

FIGURE 6-2. PENETRATION OF FIRM RESOURCES IN SOUTHWEST UTILITY PORTFOLIOS[31]



These findings add to a growing body of literature studying the challenges and reliability risks of electricity systems at very high penetrations of renewables and energy storage, presented in Table 6-3. Consistent with these findings, PNM's 2023 IRP identified firm generating resources as one of three broad categories of generation needed to meet growing electricity demands while maintaining reliability. As defined in the 2023 IRP, these are resources with the capability to operate at or near full capacity for extended periods of time that will allow PNM to maintain reliability even under the most constrained conditions in the system, which may include both periods of high demand as well as periods of low output from variable resources.

[31] "2025 Resource Adequacy Assessment: Desert Southwest." E3. May 2026. Available at: https://www.ethree.com/wp-content/uploads/2026/05/E3-SW-RA-Report_May-2026.pdf Reproduced with permission.

TABLE 6-3. SURVEY OF STUDIES EXAMINING CONTRIBUTIONS OF FIRM RESOURCES TOWARDS RESOURCE ADEQUACY

Study	Key Observations
Long-Run Resource Adequacy under Deep Decarbonization Pathways for California[32] **(E3, 2018)**	"This study demonstrates that it is possible to maintain resource adequacy for a deeply decarbonized California electricity system that is heavily dependent on renewables and electric energy storage ***as long as sufficient firm capacity is available for periods of sustained low solar production***."
Clean Firm Power is the Key to California's Carbon-Free Energy Future[33] **(Environmental Defense Fund & Clean Air Task Force, 2021)**	"…squeezing out the last increments of carbon from power generation while ***maintaining affordability and reliability will require clean firm power***."
The Moonshot 100% Clean Electricity Study: Assessing the Tradeoffs Among Clean Portfolios with a PNM Case Study[34] **(GridLab, 2023)**	Although winter demand is low relative to summer demand, there are sustained multi-day periods where solar and wind resources cannot fully meet load, even with battery storage. During this period, low levels of wind and solar in neighboring regions limits clean imports, except during mid-day hours when solar is highest. In these conditions, ***hydrogen CTs or alternative clean firm resources are required to meet demand***.
LA100: The Los Angeles 100% Renewable Energy Study[35] **(National Laboratory of the Rockies (NLR), 2021)**	"new in-basin renewable ***firm capacity*** – resources that use renewably produced and storable fuels, can come online within minutes, and can run for hours to days – ***is a key element of maintaining reliability*** at least cost…"
Getting to 100%: Six strategies for the challenging last 10%[36] **(Mai, T., et al, 2021)**	"To fill the capacity gap, ***a solution needs to be reliably available during high-stress periods***. There are many terms used to characterize such a technology, including ***'firm' capacity resource***, peakers, and technology with high capacity credit—where capacity credit is the fraction of nameplate capacity that can be reliably counted toward planning reserves or similar resource adequacy measures… For very high [renewable energy] systems, such a

[32] "Long-Run Resource Adequacy under Deep Decarbonization Pathways for California." E3. 2018. Available at https://www.ethree.com/wp-content/uploads/2019/06/E3_Long_Run_Resource_Adequacy_CA_Deep-Decarbonization_Final.pdf

[33] Long, J., et al. "Clean Firm Power is the Key to California's Carbon-Free Energy Future." Environmental Defense Fund & Clean Air Task Force. 2021. Available at https://www.edf.org/sites/default/files/documents/LongCA.pdf

[34] "The Moonshot 100% Clean Electricity Study: Assessing the Tradeoffs Among Clean Portfolios with a PNM Case Study." GridLab. 2023. Available at https://gridlab.org/wp-content/uploads/2023/08/GridLab_Moonshot-Study_Report.pdf

[35] "LA100: The Los Angeles 100% Renewable Energy Study." National Laboratory of the Rockies. 2021. Available at https://maps.nlr.gov/la100/la100-study/report

[36] Mai, T., et al. "Getting to 100%: Six strategies for the challenging last 10%." Joule. 2021. Available at https://www.sciencedirect.com/science/article/pii/S2542435122004056

Study	Key Observations
	solution needs to be available for different response durations, including multi-day periods of low [variable renewable energy] output."
The Role of Firm Low-Carbon Electricity Resources in Deep Decarbonization of Power Generation [37] **(Sepulveda, N., et al, 2018)**	"…even in regions with abundant renewable resources, ***firm low-carbon resources can lower the cost of deep decarbonization significantly***, even if the firm resources have much higher levelized costs than do variable renewables, and even if very-low-cost battery energy storage technologies are available."

6.2.5 WRAP and Regional Resource Adequacy Evolution

In response to ongoing and anticipated resource adequacy challenges across the region, a variety of entities across the Western region have been engaged in efforts to develop regional resource adequacy programs. A regional resource adequacy program's value lies in providing transparent visibility into whether the region is collectively procuring enough resources to reliably serve load under stressed conditions. It also helps align planning metrics among neighboring utilities, including how capacity is counted, how deliverability is demonstrated, and how uncertainty, outages, load risk, and resource performance are reflected. Common metrics build trust by showing that each entity brings sufficient resources to market rather than relying on others, which can improve confidence, liquidity, and dispatch efficiency while lowering costs for customers.

The first of these efforts was the WRAP, an initiative begun by the Western Power Pool in 2019. PNM participated in WRAP's non-binding phase, gaining experience with forward showings, common resource-counting concepts, and regional visibility into capacity positions. In Q4 2025, PNM and several other EDAM participants elected to leave WRAP ahead of binding obligations to pursue options more closely aligned with emerging wholesale market footprints:

> *"This decision follows careful consideration of several factors, most notably the emergence of two day-ahead markets in the West: the CAISO Extended Day-Ahead Market (EDAM) and SPP Markets+ (M+). Given these developments, PNM believes it is prudent to pursue resource adequacy programs aligned with each market, consistent with practices in other ISO/RTOs."*[38]

A similar effort is now underway to design a regional resource adequacy program for EDAM participants. As of July 2026, public stakeholder processes are evaluating how resource adequacy obligations, forward showings, deliverability requirements, and market participation rules could align with the EDAM footprint. PNM is actively participating in this design and stakeholder process.

[37] Sepulveda, N., et al. "The Role of Firm Low-Carbon Electricity Resources in Deep Decarbonization of Power Generation." Joule. Available at https://doi.org/10.1016/j.joule.2018.08.006

[38] PNM. 2025. Available at https://www.westernpowerpool.org/private-media/documents/WRAP_-_PNM_Withdraw_Letter_-_10.28.25.pdf

Over time, if successful, a regional program could strengthen the analytical basis for evaluating PRMs and resource investment needs. As regional data becomes more transparent and comparable across a larger set of loads, resources, and weather conditions, utilities and regulators may be better able to assess how regional diversity, deliverability, and correlated risk affect resource adequacy. This information could help refine reserve estimates and reduce unnecessary duplicative investment while preserving each utility's obligation to plan for and procure adequate resources for its customers.

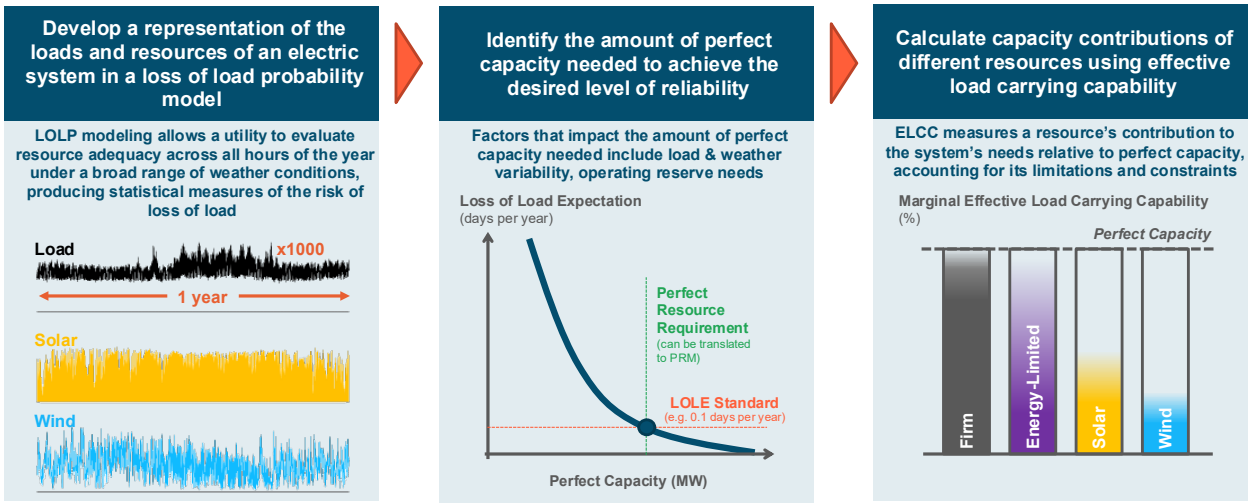
6.3 2026 Resource Adequacy Study

PNM follows the industry standard approach of meeting a PRM, above forecasted peak demand, to ensure resource adequacy, accounting for extreme weather, outages, and operating reserve requirements. In the EnCompass™ model, the PRM is set to determine the amount of accredited capacity needed to meet a reliability standard, which is then verified using SERVM. Over time, the PRM and resource accreditation have evolved as PNM's portfolio increases penetrations of variable resources and storage, firm generation has declined and to changing load forecasts have shifted the periods of highest reliability risk.

6.3.1 Background & Key Concepts

Best practices in planning for resource adequacy involve three related steps: probabilistic reliability modeling, need determination, and capacity accreditation. As shown in Figure 6-3, loss-of-load probability modeling first represents hourly load, renewable production, and resource availability across many potential system conditions. That modeling is then used to identify the amount of perfectly available capacity needed to meet the applicable reliability standard, which can be translated into a PRM. Finally, individual resources are credited toward that need based on their effective load carrying capability, so each resource's accredited capacity reflects its expected contribution to reliability during periods of system risk.

FIGURE 6-3. BEST PRACTICES FOR RESOURCE ADEQUACY: NEED DETERMINATION AND CAPACITY ACCREDITATION[39]



Loss of Load Probability Modeling

Best practices in resource adequacy planning continue to evolve, but broad consensus exists that a robust approach must evaluate the possibility that load shedding due to insufficient resources could occur at times outside of the traditional peak period. As described in a recent whitepaper published by the ESIG:

> *"Modeling sequential grid operations is critical to capture the whole picture: the variability of wind and solar resources along with the energy limitations of storage and load flexibility. Chronological stochastic analysis is thus increasingly important, simulating a full hour-to-hour dispatch of the system's resources for an entire year of operation across many different weather patterns, load profiles, and random outage draws."*

This line of thinking has heavily influenced PNM's continued efforts to refine its reliability planning approaches over the past several IRP cycles. Consistent with recommendations from ESIG and WECC, PNM continues to rely primarily on LOLP modeling within its portfolio planning process to (1) derive a PRM requirement and technology-specific ELCC values for capacity accreditation, and (2) quantify reliability statistics for various resource portfolios based on their performance across the full range of conditions throughout the year. The methods for developing a portfolio that meets these objectives for reliability while accounting for risks that may manifest throughout the year are described further in Section 7.

Planning Reserve Margin

The PRM represents the amount of capacity needed above forecasted peak demand to satisfy a specified resource adequacy standard. PNM derives the PRM through LOLP modeling, which

[39] "2025 Resource Adequacy Assessment: Desert Southwest." E3. May 2026. Available at: https://www.ethree.com/wp-content/uploads/2026/05/E3-SW-RA-Report_May-2026.pdf Reproduced with permission.

evaluates the amount of capacity needed to maintain reliability across a range of load, weather, resource availability, and operating conditions. At a high level, the PRM accounts for uncertainty and potential variance in system conditions, including the possibility that peak demand is higher than expected, weather conditions differ from normal planning assumptions, or operating reserve requirements increase the amount of capacity that must be available to reliably serve load.

Historically, many utility planning frameworks expressed the PRM using an installed capacity (ICAP) accounting convention. Under that convention, conventional resources were generally counted at their full nameplate or seasonal-rated capacity, and the PRM itself embedded several categories of reliability risk, including load variability, operating reserve requirements, and forced outages. This approach provided a practical reserve-margin framework for portfolios dominated by conventional generating resources, but it becomes less transparent as portfolios add larger amounts of variable renewable resources, storage, hybrid resources, and demand-side resources.

Utilities and regional planning entities are increasingly shifting toward accounting conventions in which resource unavailability is reflected through resource-specific capacity accreditation rather than embedded entirely in the reserve margin. Under this approach, forced outages, weather-dependent production profiles, storage duration limits, and other resource-specific availability characteristics are applied as reductions to the capacity value of each resource. The PRM then represents the system-level margin needed above forecasted peak demand, while ELCC – discussed in greater depth below – determines how much each resource counts toward that requirement.

Today, best practice is to use LOLP modeling to derive the PRM based on a benchmark of perfectly available capacity through a tuning process, whereby the target PRM is determined by iteratively solving for how much capacity would enable a system to achieve the desired standard. In that framework, the PRM primarily reflects load variability, weather-driven uncertainty in demand, operating reserve requirements, and other system-level planning uncertainties. Actual resources are then credited against the PRM requirement based on their accredited capacity value.

As the underlying drivers of reliability risk evolve over time, including customer demand, weather variability, resource availability, forced-outage performance, transmission capability, and portfolio composition, the reserve margin needed to meet the same reliability standard may differ from one IRP cycle to the next. Re-evaluating the planning reserve margin ensures that future resource decisions remain aligned with current system conditions and reliability risks.

Effective Load Carrying Capability

All resources do not provide equivalent contributions to meeting the PRM. Each resource's contribution depends on the various factors that impact its availability when it may be needed to meet system needs, which vary across technologies. For instance:

- Variable resources like wind and solar experience fluctuations in output as a result of uncontrollable meteorological conditions and diurnal cycles, meaning that their available capacity is often lower than their maximum capacity during critical periods;

- Energy storage resources have finite limits on how long they can discharge based on their rated duration;
- Firm resources are generally available at seasonal rated capacity except when experiencing a forced outage rate.

Measuring the relative contributions of each resource in a manner that accounts for these limitations requires the use of ELCC methodology to count capacity towards the requirement (a practice known as capacity accreditation). ELCC is a statistical measure of a resource's contribution to resource adequacy measured relative to a benchmark of theoretical perfect capacity. This concept and its linkage to LOLP modeling is described in a recent E3 whitepaper on resource adequacy:

> *"ELCC is a natural extension of LOLP modeling, measuring the change in total capacity provided by a portfolio of resources from adding or subtracting a quantity of an individual resource type. ELCC measures the capacity contribution from adding resources individually or in combination, providing a means to send efficient signals for investment in each resource type based on the marginal contributions it makes toward the portfolio's ability to avoid loss of load."*[40]

ELCC (and similar concepts) are now widely used by utilities, resource adequacy programs, and capacity markets for capacity accreditation. It has become the *de facto* preferred method for multiple related reasons:

- ELCC reflects resource availability during critical periods, regardless of when they may occur.
- ELCC provides an economically efficient signal for investment in new resources. By using a marginal ELCC methodology to assign capacity credits to new resources, planners may identify the least-cost portfolio to satisfy a given resource adequacy criterion.
- ELCC captures the complex dynamics that have been identified across the growing body of research into emerging resource adequacy challenges. These include saturation effects, complex interactive effects among technologies, and asymmetric risks. These dynamics, and how they are captured in ELCC calculations, are described in Table 6-4.

TABLE 6-4. DESCRIPTION OF PLANNING CHALLENGES CAPTURED IN THE ELCC METHODOLOGY

Dynamic	Description	Reflection in ELCC Calculations
Saturation effects	Individual resources decrease in effectiveness as their penetrations grow and system risks shift (e.g. value of additional solar declines as risk shifts from peak to net peak period)	ELCC curves for individual resources show declining marginal value with successive increments of capacity

[40] "Resource Adequacy for the Energy Transition: A Critical Periods Reliability Framework and its Applications in Planning and Markets." E3. 2025. Available at https://www.ethree.com/wp-content/uploads/2025/08/E3_Critical-Periods-Reliability-Framework_White-Paper.pdf

Dynamic	Description	Reflection in ELCC Calculations
Interactive Effects	Complementary resources contribute more to system needs than the sum of their individual parts (e.g. solar and storage are a complementary pair)	ELCC calculations for combinations of resources can account for diversity benefits of complementary resources, which may be rendered in a multidimensional ELCC function
Asymmetric Risks	Resource adequacy risks tend to cluster during periods of higher-than-normal plant outages (e.g. large or numerous thermal outages can be a driver of loss-of-load risk)	Calculated ELCC values derate capacity credit based on availability during critical periods, which may be lower than average availability

Because resource ELCC's are portfolio and system dependent, they should be re-evaluated during each IRP cycle rather than treated as a fixed resource characteristic. Changes in portfolio composition, resource penetration, load magnitude and shape, weather patterns, forced-outage assumptions, storage duration, transmission capability, and regional market availability can shift the hours of greatest reliability risk and therefore change how much dependable capacity each resource contributes during those periods. Reassessing ELCC using updated assumptions ensures that resource accreditation remains aligned with the current portfolio, planning reserve margin, and reliability standard, while also capturing saturation effects and the diversity benefits among complementary technologies. ELCC evaluations within IRP cycles may also be required if new system loads, resources or system changes occur.

6.3.2 Methodology Highlights

PNM's 2026 resource adequacy study, conducted by PowerGEM using the SERVM LOLP model, includes two distinct elements: (1) calculation of a PRM requirement consistent with PNM's planning standard, equal to an LOLE of 0.1 days per year (or one day in ten years); and (2) calculation of ELCC values used to count resources towards the PRM requirement. The methods used in this study are aligned with industry best practices described above and consistent with previous resource adequacy studies supporting PNM's IRPs. Input data and assumptions have been refreshed for consistency with planning assumptions used in this IRP, and PowerGEM has also made extensive updates to the representations of neighboring electricity systems to reflect planning assumptions contemporaneous with this IRP. These data and assumptions are documented more completely in Appendix M.

While the methods used herein are largely consistent with previous IRPs, PNM continues to incorporate improvements in the methods used to ensure resource adequacy planning. The 2026 resource adequacy study includes three such enhancements, each of which is described in further detail below: (1) application of ELCC to thermal resources, (2) incorporation of seasonal import limits, and (3) novel methods for accounting for solar and storage interactive effects.

Stakeholder Input: ELCC Study for Thermal Generation

One of the 2023 IRP filed comments that PNM agreed to adopt was to perform an ELCC study for thermal generation. PNM contracted with PowerGEM to perform PNM's ELCC study for thermal generation using consistent methodology as used for all other technologies evaluated. PowerGEM presented the methodology in the January 27, 2026, FSP office hour meeting to solicit feedback from stakeholders. Results of this study are described below and were incorporated into PNM's modeling.

Application of ELCC to Thermal Resources

PNM's approach to capacity accreditation for thermal resources has evolved progressively in a manner that has increasingly improved alignment with the methods used for renewable and storage capacity accreditation.

- Prior to the 2020 IRP, PNM relied on a PRM accounting convention known as the ICAP convention for thermal resources. Under this convention, all firm resources were counted towards the requirement at their full rated capacity, and a portion of the PRM requirement itself accounted for the possibility that some portion of that fleet would be unavailable when needed due to forced outages. This simple approach was widely used by utilities historically, when the large majority of resources on the electric system are firm resources that could be dispatched at maximum capacity when needed.
- In the 2020 and 2023 IRP, PNM transitioned to the use of an Unforced Capacity (UCAP) methodology, where the capacity accredited to each thermal resource was derated by its expected forced outage rate. The purpose of this adjustment was to better align the conventions used to accredit thermal resources with the ELCC approach applied to renewable and storage resources.
- In the 2026 IRP, PNM has transitioned from the UCAP approach to use of ELCC for thermal resources, harmonizing the capacity accreditation methods used across thermal, renewable, and storage resources. The application of an ELCC approach to thermal resources typically yields lower capacity values than the UCAP approach, a reflection of the fact that reliability events are more likely to occur during periods when the quantity of capacity experiencing forced outages is larger than average.

The transition to ELCC methodology for thermal resource capacity accreditation provides for the most consistent accounting of capacity across technologies and ensures a level playing field when considering the relative effectiveness of all new resources in meeting PNM's future capacity needs.

Seasonal Import Limits

One of the key assumptions that impacts both the PRM requirement and the ELCC calculations for existing and new resources is the representation of market assistance, representing PNM's ability to purchase electricity from other utilities in the region to meet a portion of its own needs.

Historically, the characterization of market assistance limits has focused on the summer season, the periods of greatest historical risk. In the 2020 and 2023 IRPs, PNM's resource adequacy planning studies incorporated an import limit of 50 MW during summer net peak hours. This limit was determined based on real-world operating conditions during the summer of 2020, when west-wide heat waves resulted in tight conditions across the Western Interconnection.

The roundtrip resource adequacy analysis conducted in the 2023 IRP revealed that with higher penetrations of renewables and storage, loss of load risk could eventually migrate to winter season:

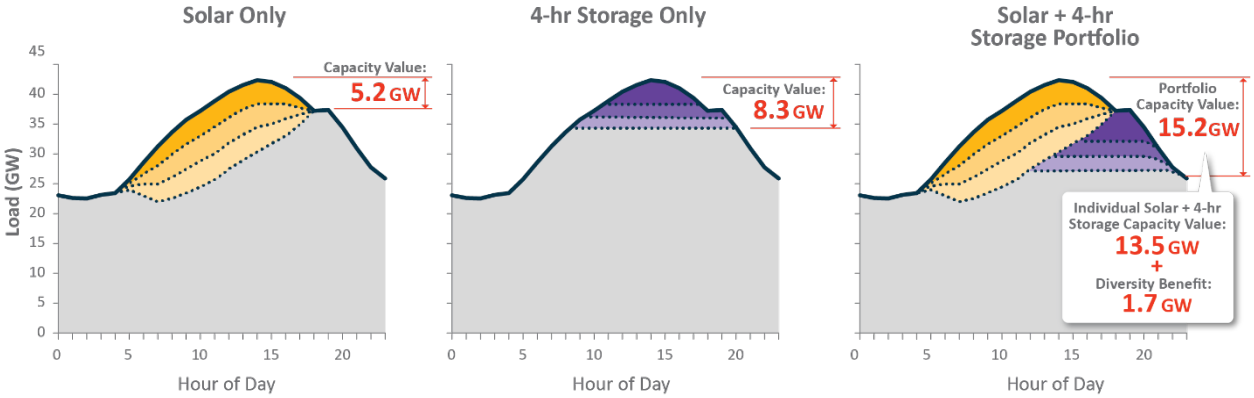
> *"Today, the most prevalent periods of reliability risk (or "loss of load risk") occur in the late summer evenings, as the sun sets and demand for power is still high. As the system evolves, these patterns of loss of load risk will start to shift later in the evening and eventually may migrate to the winter season…. In [the All Technologies] scenario, the predominant periods of loss of load risk are (1) in the summer evenings, stretching all the way to the early morning hours; and (2) in the winter mornings before sunrise."*

This finding prompted a need for a critical review of import availability during winter months. Based on historical operational data, PNM and PowerGEM developed a winter import limit profile, limiting imports to 250 MW during overnight hours and 800 MW during daylight hours. This winter limit has been incorporated into all resource adequacy studies, along with the 50 MW limit during summer net peak hours.

Updated Treatment of Solar-Storage Interactive Effects

In summer peaking systems like PNM, solar and storage resources complement one another in contribution to system resource adequacy needs: the two resources in combination provide more effective capacity than the sum of their individual contributions. This effect, illustrated in Figure 6-4, can be understood as the result of the fact that increasing penetrations of solar shorten the time period across which storage resources must operate, allowing those resources to be used more effectively during critical periods. The effect has been identified in multiple studies, including the resource adequacy study completed in support of PNM's 2023 IRP.

FIGURE 6-4. ILLUSTRATIVE FIGURE SHOWING COMPLEMENTARITY OF SOLAR AND STORAGE TO MEETING RESOURCE ADEQUACY NEEDS[41]



While the effect itself has been established, capturing this relationship dynamically within IRP planning tools is a computational challenge. EnCompass™, the capacity expansion model used by PNM, currently includes functionality that allows for dynamic ELCC curves for each resource, where the capacity credit of a single resource (e.g. solar) changes as a function of its penetration; however, it does not allow for that capacity credit to change endogenously as a function of the penetration of other resources (e.g. storage) on the system.

To account for these interactive effects with these limitations, PNM has incorporated improvements in the scope and outputs of the resource adequacy study over successive study cycles, enabling improvements in the approximation of the interactive effects:

- In the 2020 IRP, no complementary interactive effects between new solar and storage resources were captured in the modeling; each resource was modeled with an independent ELCC curve. This approach was criticized by stakeholders, who cited the lack of consideration of interactive effects as one of the reasons that PNM's 2040 resource portfolios showed LOLE results below 0.1 days per year.
- In the 2023 IRP, to improve accounting of interactive effects, PNM incorporated ELCC curves for each technology that change over time that captured assumed changes in underlying portfolio: in the near-term, the storage ELCC curve was calculated relative to a system with 1,500 MW of solar; in the medium-term, the curve was recalculated relative to a system with 2,000 MW of solar; and in the long-term the curve was recalculated assuming 2,500 MW of solar. This approach allowed PNM to capture higher capacity contributions for storage resources over time, but resulted in sharp transitions in capacity accreditation in PNM's loads and resources at the transition points between the curves.
- The 2026 IRP incorporates a novel approach for capturing these interactive effects, whereby the ELCC curve for storage is calculated assuming that solar resources are also

[41] E3. "Charging Forward: Energy Storage in a Net Zero Commonwealth." December 2023. Available at: https://www.mass.gov/doc/charging-forward-energy-storage-in-a-net-zero-commonwealth/download Reproduced with permission.

added to the system at a two-to-one ratio.[42] This approach allows PNM to derive and apply a single ELCC curve for storage resources across the planning horizon that simultaneously captures the complementarity of solar and storage additions across the horizon.

Reliability Validation of Portfolios

To evaluate resource adequacy under future expansion plans, PNM developed candidate portfolios and simulated a select few to be evaluated in SERVM for the 2036, 2040, and 2045 study years. Each portfolio was assessed against the reliability target of 0.1 LOLE by modeling the full resource fleet under projected demand and energy requirements.

Where portfolio results in SERVM deviated from the 0.1 LOLE target, PNM quantified the amount of 4-hour battery storage required to restore compliance by simulating multiple storage adjustment levels and interpolating the storage quantity corresponding to the target reliability level. While these storage adjustments were documented for analytical purposes, expansion plan portfolios determined in EnCompass were not adjusted with energy storage. A stakeholder-proposed portfolio was also evaluated across the same study years to validate its resulting reliability performance. Additional details of this methodology are described in Appendix M.

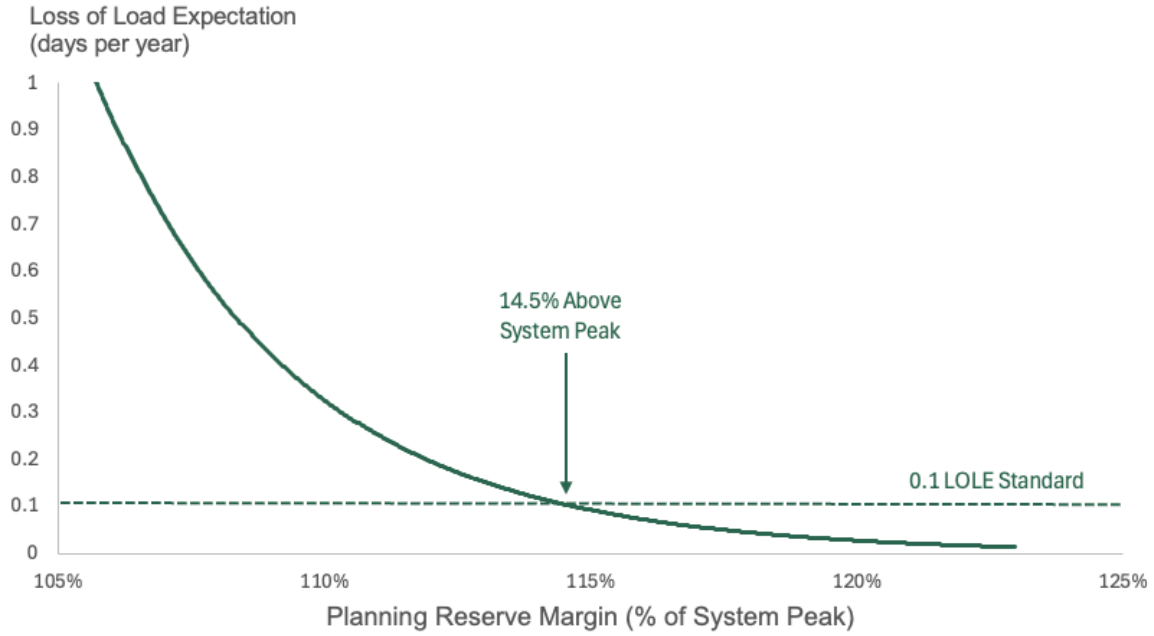
6.3.3 Key Results

Planning Reserve Margin Requirement

Based on the work performed by PowerGEM, the 2026 Resource Adequacy study indicates that PNM should target a PRM of 14.5% to satisfy the LOLE standard of 0.1 days per year. Applying this target PRM ensures capacity expansion modeling builds sufficient resources in each year to meet this standard. Figure 6-5 shows the illustrative relationship between PRM and the resulting level of reliability (lower levels of planning reserves translate to higher frequency of loss of load).

[42] This relative rate of additions is based on previous IRP modeling showing solar and storage added to the system at approximately this ratio across a wide range of scenarios.

FIGURE 6-5. RELATIONSHIP BETWEEN LOLE AND PLANNING RESERVE MARGIN



Existing System Accredited Capacity

The Resource Adequacy study also includes a calculation of the accredited capacity of resources included in PNM's current portfolio using a 2029 base year, which determines PNM's initial position when comparing to system projected peak demand. These values capture the technology-specific characteristics and limitations of each type of resource, reflecting their performance during the periods when they are needed by the system. The results of this analysis, shown in Table 6-5 capture important differences in the contributions by technology type to meet PNM's resource adequacy needs:

- Most firm dispatchable resources, such as nuclear and natural gas, generally exhibit high ELCCs (over 90%), reflecting the fact that these units can be operated at maximum capacity to serve loads when needed except in the event of forced outage events. The comparatively lower ELCCs for coal and geothermal resources are a result of higher forced outage rates (over 20%).
- Dynamic balancing resources (battery storage and DR) exhibit moderately high ELCCs, reflecting the fact that while these resources can be dispatched when needed, the energy limited characteristic tempers their capacity contribution.
- Variable resources (solar and wind) show comparatively low ELCCs (under 20%), largely due to their highly variable output and non-coincidence with system critical hours.

TABLE 6-5. ELCC VALUES FOR PNM'S EXISTING RESOURCE PORTFOLIO

Unit Category	Installed MW	ELCC %	Accredited MW
Nuclear	288	94%	271
Coal	200	72%	143
Natural Gas CC	425	92%	393
Natural Gas CT	614	98%	602
Natural Gas ST	145	92%	133
Geothermal	11	76%	8
Wind	1,408	12%	169
Solar	2,412	19%	458
Battery	1,950	75%	1,471
Demand Response	70	63%	44

Note: Includes existing resources, approved new resources, and new resources pending approval through 2029

These values are applicable to PNM's current portfolio of resources for this 2026 IRP; ELCCs for incremental additions vary by technology due to saturation effects and interactions with other resources on the system. The ELCC curves applied to new technologies, also produced within this study, are discussed in Appendix M and tabulated in Section 8.6.

Resiliency Study

To evaluate how candidate expansion portfolios perform under severe stress, PowerGEM conducted a resiliency analysis on calibrated CTP and HEG portfolios across the 2036, 2040, and 2045 study years. The analysis evaluated system performance during extreme summer and winter weather events under both standard interconnected operations and an "islanded" sensitivity, which models system self-sufficiency under severe regional constraints with zero external market support. In addition to the summaries of analyses performed under the resiliency study described below, detailed results of the technical report can be found in Appendix M.

Seasonal Risk Characteristics

The islanded resiliency simulations reveal fundamentally different operational challenge profiles between summer and winter extreme weather events. In summer, EUE is characterized by shallow, recurring pre-dawn shortfalls. Storage resources successfully discharge through the evening net-load peak but are drawn down overnight, reaching their lowest state of charge shortly before sunrise before solar generation returns to recharge the system. Conversely, extreme winter events create severe, multi-day energy deficits. Driven by dual morning and evening load peaks during cold snaps, storage fleet state of charge depletes progressively over consecutive days with insufficient daytime generation to recharge. Consequently, while summer experiences

more frequent, low-magnitude loss-of-load hours, extreme winter events produce substantially higher total EUE concentrated at the end of multi-day cold snaps.

Firm Capacity Ratios as Resiliency Drivers

System performance under extreme islanded conditions correlates strongly with the portfolio's share of firm, dispatchable capacity relative to peak load. Across study years, winter EUE moves inversely with the firm capacity ratio. Portfolios featuring lower firm capacity shares, such as the CTP 2040 portfolio (39.8% firm share) and the HEG 2036 portfolio (37.6% firm share), experience the highest winter EUE due to storage depletion across multi-day stress periods. By 2045, the addition of 1,022 MW of clean firm small modular reactors (SMR) capacity elevates firm capacity ratios above 45% across both portfolios, significantly reducing islanded summer and winter unserved energy to their lowest levels in the study horizon.

Marginal Technology Resiliency Comparison

PowerGEM further evaluated the marginal resiliency contribution of distinct technology types by adding 100 MW of incremental load to the calibrated 2036 CTP portfolio and sizing individual candidate technologies, combustion turbines, 4-hour BESS, DR, and paired solar with storage, to restore the system to an equivalent LOLE.

While short-duration BESS, DR, and solar-plus-storage offer strong performance during brief summer evening peaks they degrade significantly during multi-day winter freeze events. Because energy-limited resources cannot sustain multi-day output or fully recharge between consecutive winter peaks, 4-hour BESS experiences four times the winter EUE of a firm combustion turbine despite requiring more than three times the installed nameplate capacity to achieve the baseline 0.1 LOLE. These findings confirm that while variable energy and short-duration storage effectively mitigate short-duration summer peak risks, firm dispatchable capacity remains indispensable for maintaining system resiliency during sustained, multi-day winter weather extremes.

6.4 Existing System Load-Resource Balance

The outputs from the resource adequacy study presented above provide the basis for the derivation of PNM's initial loads and resources tables, which compares PNM's total capacity needs (peak demand plus the PRM) against the accredited capacity provided by the resources currently in its portfolio. For clarity, resources are subdivided into three groups: (1) existing resources that are in service at the time of the IRP's publication; (2) new resources that have been approved by NMPRC and are currently under development; and (3) proposed new resources that have been filed at the NMPRC but not yet been approved. Table 6-6 shows the load-resource balance over time across the three primary load forecasts developed for the IRP. For each of these load forecasts, the gap between the peak demand plus PRM and the accredited capacity provided by the current portfolio represents the additional amount of accredited capacity that would be needed to meet resource adequacy requirements. The timing of when new capacity resources varies according to the pace of load growth:

- Under the CTP future, this need for new capacity emerges in the mid 2030s;
- In the HEG forecast, additional capacity is needed as soon as 2026; and

- In the LEG forecast, additional capacity is not needed until the end of the planning horizon.

Table 6-6 provides additional detail on PNM's loads and resources, including existing resources, approved new resources, and new resources pending approval under the CTP. Due to load growth, resource retirements, and contract expirations, the current portfolio is insufficient to meet PNM's long-term resource adequacy needs. In most years, the capacity need grows by less than 50 MW due to ongoing assumed load growth; larger increases occur upon specific unit retirements or contract expirations, including:

- Expiration of the Valencia PPA extension by end of 2039;
- Retirements of Afton, Luna, and Rio Bravo by end of 2044;
- Expiration of a number of existing wind, solar, and storage agreements in the early 2040s; and
- Assumes Palo Verde Unit 1 exits the portfolio at the end of its current lease (2045).

TABLE 6-6. CURRENT SYSTEM LOAD-RESOURCE BALANCE UNDER CTP LOAD FORECAST

Year	Existing Resources (MW)	Approved New Resources (MW)	New Resources Pending Approval (MW)	Total Resources (MW)	Peak Demand (MW)	Peak Demand + PRM (MW)	Capacity Position (MW)
2026	2,572	0	0	2,572	2,250	2,576	(4)
2027	2,572	163	0	2,736	2,448	2,803	(67)
2028	2,736	426	0	3,162	2,641	3,024	138
2029	2,829	426	440	3,694	3,082	3,529	165
2030	2,787	426	440	3,652	3,124	3,577	75
2031	2,643	426	636	3,705	3,136	3,591	114
2032	2,640	426	636	3,703	3,152	3,609	94
2033	2,638	426	636	3,700	3,188	3,650	50
2034	2,635	426	636	3,698	3,218	3,685	13
2035	2,626	426	636	3,689	3,238	3,708	(18)
2036	2,618	426	636	3,680	3,254	3,726	(46)
2037	2,615	426	636	3,678	3,278	3,753	(75)
2038	2,613	426	636	3,676	3,312	3,792	(117)
2039	2,611	426	636	3,673	3,360	3,847	(174)
2040	2,445	426	636	3,507	3,391	3,883	(375)
2041	2,405	426	636	3,468	3,420	3,916	(448)
2042	2,403	426	636	3,466	3,461	3,963	(497)
2043	2,175	426	636	3,238	3,500	4,008	(770)

Year	Existing Resources (MW)	Approved New Resources (MW)	New Resources Pending Approval (MW)	Total Resources (MW)	Peak Demand (MW)	Peak Demand + PRM (MW)	Capacity Position (MW)
2044	1,574	426	636	2,637	3,562	4,078	(1,441)
2045	773	426	636	1,835	3,604	4,127	(2,291)

Note: Resource amounts shown as accredited capacity; PRM requirement of 14.5%

Table 6-7 shows PNM's loads and resources under the HEG forecast. This load forecast, which is approximately 200 MW higher than the CTP forecast in 2026 and increases at a faster rate, experiences an immediate capacity deficit. Through 2031, that deficit remains relatively stable with planned resource additions. Thereafter it increases at a rapid rate, reaching roughly 500 MW by 2035, 1,000 MW by 2040, and surpassing 3,000 MW by the end of the planning horizon.

TABLE 6-7. CURRENT SYSTEM LOAD-RESOURCE BALANCE UNDER HEG LOAD FORECAST

Year	Existing Resources (MW)	Approved New Resources (MW)	New Resources Pending Approval (MW)	Total Resources (MW)	Peak Demand (MW)	Peak Demand + PRM (MW)	Capacity Position (MW)
2026	2,572	0	0	2,572	2,414	2,764	(192)
2027	2,572	163	0	2,736	2,639	3,022	(286)
2028	2,736	426	0	3,162	2,844	3,256	(94)
2029	2,829	426	440	3,694	3,331	3,814	(120)
2030	2,787	426	440	3,652	3,405	3,899	(246)
2031	2,643	426	636	3,705	3,447	3,947	(242)
2032	2,640	426	636	3,703	3,491	3,997	(294)
2033	2,638	426	636	3,700	3,558	4,074	(373)
2034	2,635	426	636	3,698	3,619	4,144	(446)
2035	2,626	426	636	3,689	3,671	4,203	(514)
2036	2,618	426	636	3,680	3,719	4,258	(578)
2037	2,615	426	636	3,678	3,778	4,326	(648)
2038	2,613	426	636	3,676	3,850	4,408	(733)
2039	2,611	426	636	3,673	3,932	4,502	(829)
2040	2,445	426	636	3,507	3,994	4,573	(1,066)
2041	2,405	426	636	3,468	4,056	4,644	(1,176)
2042	2,403	426	636	3,466	4,135	4,735	(1,269)
2043	2,175	426	636	3,238	4,212	4,823	(1,585)
2044	1,574	426	636	2,637	4,318	4,944	(2,307)
2045	773	426	636	1,835	4,398	5,036	(3,200)

Note: Resource amounts shown as accredited capacity; PRM requirement of 14.5%

Table 6-8 shows PNM's loads and resources under the LEG forecast. This forecast is roughly 200 MW lower than the CTP forecast in 2026 and grows at a very slow rate in most years. As a result, PNM's current portfolio of resources – including assumed new resource additions – is sufficient to meet reliability needs through 2043. The subsequent retirement of a substantial portion of PNM's existing gas resources results in the emergence of a large capacity need in the final two years of the horizon.

TABLE 6-8. CURRENT SYSTEM LOAD-RESOURCE BALANCE UNDER LEG LOAD FORECAST

Year	Existing Resources (MW)	Approved New Resources (MW)	New Resources Pending Approval (MW)	Total Resources (MW)	Peak Demand (MW)	Peak Demand + PRM (MW)	Capacity Position (MW)
2026	2,572	0	0	2,572	2,026	2,320	253
2027	2,572	163	0	2,736	2,078	2,379	356
2028	2,736	426	0	3,162	2,130	2,439	723
2029	2,829	426	440	3,694	2,523	2,889	806
2030	2,787	426	440	3,652	2,565	2,937	715
2031	2,643	426	636	3,705	2,616	2,995	710
2032	2,640	426	636	3,703	2,624	3,004	698
2033	2,638	426	636	3,700	2,640	3,023	678
2034	2,635	426	636	3,698	2,648	3,032	666
2035	2,626	426	636	3,689	2,652	3,037	653
2036	2,618	426	636	3,680	2,653	3,038	642
2037	2,615	426	636	3,678	2,662	3,048	630
2038	2,613	426	636	3,676	2,678	3,066	609
2039	2,611	426	636	3,673	2,700	3,092	582
2040	2,445	426	636	3,507	2,707	3,100	408
2041	2,405	426	636	3,468	2,718	3,112	356
2042	2,403	426	636	3,466	2,739	3,136	329
2043	2,175	426	636	3,238	2,758	3,158	80
2044	1,574	426	636	2,637	2,794	3,199	(562)
2045	773	426	636	1,835	2,816	3,224	(1,389)

Note: Resource amounts shown as accredited capacity; PRM requirement of 14.5%

7. Analytical Approach

Chapter Highlights

1. This section presents the analytical approach used to develop resource portfolios under varying assumptions over the 2026-2045 planning horizon.
2. The analytical framework incorporates three futures, twelve sensitivities, and twelve stakeholder-requested scenarios to cover a broad range of uncertainties and assumptions in load growth, technology, fuel-price, policy, transmission availability, and stakeholder interests.
3. Two industry-leading tools, EnCompass™ and SERVM, were used to identify the optimal resource portfolios balancing affordability, reliability, and environmental objectives.
4. Nodal modeling, which evaluates transmission losses, renewable curtailment, and congestion hours and costs, was incorporated into PNM's 2026 IRP for the first time.

To achieve the objectives outlined above, PNM relies upon a robust analytical framework that builds upon and enhances the methods used in previous IRPs to conduct an extensive analysis. The focus of this IRP to continue its progress on transitioning to a carbon-free portfolio presents a number of uniquely challenging issues, none more significant than the question of how PNM might achieve this goal while maintaining reliability. To determine the best resource portfolio under various scenarios and sensitives, PNM employs sophisticated software to optimize the portfolio while accounting for resource adequacy needs. This section describes these components to help identify the MCEP from the modeling results across a range of evolving system conditions.

7.1 Planning Horizon

The 2026 IRP maps out a long-range framework to maintain a reliable and affordable resource portfolio that meets environmental requirements for PNM's customers over the next 20 years. To ground this framework, PNM has established clear definitions for the key planning horizons in the 2026 IRP: Appendix P contains a diagram of the IRP Planning, Action Plan and Focus Period Timeline as well as a diagram of the procurement timeframes.

TABLE 7-1. 2026 IRP PLANNING HORIZONS

The Action Plan Period (2027–2029):

Legally defined by rule as the three-year period following the filing of the IRP, this is the near-term window where PNM carries out specific, concrete implementation efforts tied to the 2026 IRP. Accordingly, implementation activities, such as the potential development and issuance of a future competitive procurement, align with this Action Plan window.

The Focus Period (2033–2036)

A look-ahead period bridging the immediate action plan timeframe and the medium-term horizon. Because new resources and associated system expansion require extensive lead times to design, clear interconnection queues, procure equipment, and construct, PNM must evaluate system requirements further out. The Focus Period represents the target window where resources solicited during the Action Plan Period are scheduled to enter commercial service to address incremental need from resource retirement(s) and/or increasing demand expected during the Focus Period.

The Planning Period (2026–2045)

Legally defined by rule as the 20-year future period for which PNM develops its IRP. This macro-level time horizon is utilized to evaluate long-term system trajectories, statutory clean energy mandates, and lifecycle economic trends.

7.2 Scenario Analysis Framework

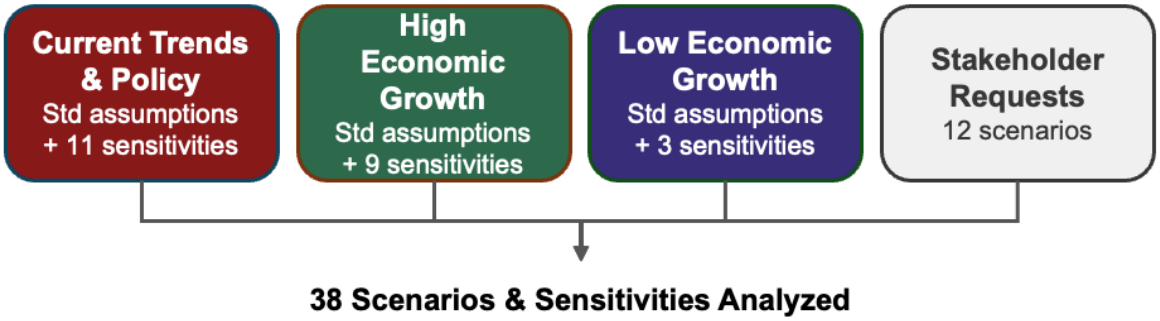
PNM 2026 IRP applies a scenario analysis framework to create and analyze optimized resource portfolios under a range of future assumptions. The scenarios and sensitivities analyzed explore both (a) how external conditions may impact the resource portfolios to meet customer needs and policy objectives, and (b) how specific decisions made by PNM could alter the composition of the resource portfolio and impact reliability, affordability, and environmental metrics.

The 2026 IRP includes analysis of a total of 38 distinct scenarios and sensitivities, described below and summarized in Figure 7-1:

- **Three futures,** corresponding to the three states of the world presented in Section 3, analyzed under a defined set of standard assumptions;
- **Twelve sensitivities**, each of which alters a specific assumption within the standard assumptions to test its impact upon portfolios, each analyzed under one or more of the futures described above; and

- **Twelve stakeholder scenarios**, whose parameters and assumptions were defined by stakeholders through the collaborative stakeholder process.

FIGURE 7-1. SCENARIO FRAMEWORK USED IN THE 2026 IRP



7.2.1 FUTURES

The 2026 IRP focuses on three scenarios that create a future envelope for potential load growth. In light of the level of uncertainty of potential future large customer growth, this orientation ensures that the learnings and outputs produced by the IRP can continue to provide actionable intelligence to inform decisions even if future updates to the load forecast are needed. Each of the three scenarios is defined by one of the load forecasts described in Section 3:

- The **"Current Trends & Policy"** future reflects the best estimates of the future state of the world based on the knowledge at the time of the IRP's development. Specifically, in this future, PNM assumes continued economic and population growth within PNM's service territory consistent with trends as forecast by Woods and Poole, as well as moderate levels of incremental customer solar and electrification.
- The **"High Economic Growth"** future reflects an alternative assumption of high growth of the New Mexico economy. In addition to a high economic development demand, this future assumes greater levels of customer adoption of EVs and building electrification. While the HEG future generally incorporates high-growth forecast components, the Low BTM Solar forecast is utilized because lower levels of customer-sited solar result in higher net system load and is therefore more consistent with the objective of representing a higher load growth future. In combination, these factors increase demand while reshaping its daily patterns.
- The **"Low Economic Growth"** future reflects an alternative assumption of slower economic growth of the New Mexico economy. In contrast to the HEG future, lower levels of economic growth are assumed to have a low economic development demand, reduced customer adoption of EVs and slower industry demand development. While the LEG future generally incorporates low-growth forecast assumptions, the High BTM Solar forecast is utilized because higher levels of customer-sited solar reduce net system load and are therefore more consistent with the objective of representing a lower load growth future. In combination, these factors reduce demand while altering the daily load profile.

TABLE 7-2. STANDARD ASSUMPTIONS ACROSS SCENARIOS

Category	Key Assumptions
Financial Assumptions	• Weighted average cost of capital of 6.9% • General inflation of 3%
Resource Adequacy	• PRM targets of 14.5% • Technology-specific ELCC curves used for capacity accreditation
Carbon and Renewable Targets	• CO2 emission intensity targets 200 lbs/MWh by 2032, and carbon-free by 2045 • RPS targets (50% by 2030 and 80% by 2040)
Existing Resources	• PVNGS remains in service throughout the 20-year planning horizon • FCPP exits by 2031 • La Luz and Lordsburg units are converted from natural gas to hydrogen fuel beginning in 2045 • Operating life of Reeves (146 MW) is extended through 2044 • All other existing gas units remain in service through 2044 • Existing PPAs and ESAs expire at the end of their contract terms
Approved Resources Under Development	• New resources approved in 2026 and 2028 Resource Applications are included in all portfolios
New Resources Pending Approval	• Resources selected in the 2029-2032 Resource Application are included in all portfolios • A new 172 MW combustion turbine is included as a proxy unit in 2029 in all portfolios. Actual resource selection will be determined though a 2029-2032 All-Source RFP Supplement bid evaluation and subsequent resource application, subject to Commission approval
New Resource Options	• All candidate resource technologies are included in all scenarios, with exception of specific sensitivity analysis and stakeholder scenarios • Technology pricing and future technology cost curves are developed from EPRI data, NLR's 2024 Annual Technologies Baseline, and other experts, except for technologies subject to stakeholder-specified assumptions in certain stakeholder scenarios • Total capacity of generic new wind resources is limited to 1,000 MW based on capacity of Western Spirit #3 transmission line • All other supply-side resources are not limited in resource potential • Emerging technologies are assumed to become available between 2029 and 2035 based on their technology maturity • EE and DR are modeled as resources; their capacity is limited based on the EE & DR potential study

Category	Key Assumptions
Federal Tax Credits	• No tax credits available to new wind and solar resources beginning 2029 • ITC for energy storage resources is 30% through 2033, stepping down to 22.5% in 2034, 15% in 2035, and 0% in 2036 and thereafter
Commodity Pricing	• Reference case natural gas prices are used • Reference case electricity market price is used • No explicit cost is applied to carbon emissions throughout the planning horizon

7.2.2 Sensitivities

A sensitivity is an analysis of the impact of varying a single input assumption within a defined future. The adjustment of a single assumption isolates the impact of critical uncertainties or decision points to identify the key risk factors to the portfolio, quantifying their impact on the expected cost as well as analyzing the types of resources identified in the plan. In the facilitated stakeholder process for the 2023 IRP, stakeholders provided feedback on the design of sensitivities for PNM's 2026 IRP; several of the sensitivities described below were informed directly by those comments.

Table 7-3. Sensitivities Studied Under Each of the Three Futures

	CTP	HEG	LEG
Standard Assumptions	●	●	●
No Energy Transition Act	●	●	●
400 lbs/MWh through 2044	●	●	●
Federal CO2 tax in 2030	●	○	○
High electric vehicles	●	○	○
Time-of-use rates	●	●	●
Extreme economic growth	○	●	○
Late long-duration storage maturity	●	●	○
No new natural gas resources	●	○	○
Transmission – Rio Sol Connection	●	●	○
Transmission – SunZia Connection	●	●	○
Transmission – Blackwater DC Tie	●	●	○
Transmission – Four Corners Connection	●	●	○

These sensitivities generally fall into four categories: (1) policy and regulatory, (2) load forecast, (3) technology availability, and (4) transmission projects. Descriptions of each of these categories and the relevant sensitivities are provided below.

Policy and Regulatory sensitivities are designed to examine the impacts of both existing and potential future policies and regulations on PNM's portfolio decisions. These sensitivities provide PNM with a better understanding of how existing regulations impact future resource decisions and enable PNM to mitigate risks of future policy changes.

TABLE 7-4. DESCRIPTION OF POLICY & REGULATORY SENSITIVITIES

Sensitivity	Sensitivity Details
No ETA	Does not impose CO_2 emission limits, RPS requirements, and carbon-free energy requirements across the planning horizon.
400 lbs CO_2/MWh through 2044	The assumption here is that the ETA maintains a carbon intensity requirement of 400 lbs/MWh through 2044 and a carbon-free generation portfolio beginning in 2045.
Federal CO_2 tax in 2030	A federal CO_2 tax is assumed to be implemented beginning in 2030.

Stakeholder Input: Expand modeling sensitivities regarding electrification

Stakeholders commenting on PNM's 2023 IRP requested additional modeling of electrification-based sensitivities. In response, PNM analyzed this request through the lens of high light-duty electric vehicle adoption rates in PNM's service territory, resulting in increased system energy usage. This sensitivity was evaluated under the CTP future.

Load Forecast sensitivities test the impact of various alternative assumptions regarding PNM's load forecast. These results provide PNM with useful directional information on how portfolio strategies should evolve if future electricity demand deviates from PNM's reference load forecast.

TABLE 7-5. DESCRIPTION OF LOAD FORECAST SENSITIVITIES

Sensitivity	Sensitivity Description
High electric vehicles	This sensitivity assumes a high electric vehicle forecast applied to evaluate the impacts of accelerated electric vehicle adoption.
Time-of-use rates	The time-of-use forecast is applied to evaluate the impacts of customer load shifting and changes in load shape associated with high TOU rate adoption.

Extreme economic growth	This sensitivity applies an extreme economic development load forecast to assess the required resource portfolio impacts of significant economic growth.

Technology availability sensitivities evaluate how PNM's portfolio would change under circumstances that limit or constrain the availability of certain types of new generation. These sensitivities provide insight into how alternative resources may meet PNM's needs and allow for quantification of the value provided by a diverse resource portfolio.

TABLE 7-6. DESCRIPTION OF TECHNOLOGY AVAILABILITY SENSITIVITIES

Sensitivity	Sensitivity Description
Late long duration storage maturity	This sensitivity assumes a delay in the availability of LDES resources until 2040 to evaluate the impacts of slower technology commercialization.
No new natural gas resources	This sensitivity removes all new gas-fired candidate resources from consideration, allowing the analysis to evaluate portfolio development without new natural gas.

Transmission projects sensitivities evaluate the impact of including discrete new transmission projects that would provide access to new markets and influence the operation of PNM's resources. These sensitivities represent a step forward in PNM's efforts to integrate generation and transmission planning by providing a means of examining the joint impacts of the two decisions together. Transmission sensitivities are evaluated only in production cost modeling and utilize the same portfolio of resources developed under the standard assumptions. Detailed descriptions of the four transmission projects in Table 7-7 can be found in Section 5.8.1.

TABLE 7-7. DESCRIPTION OF TRANSMISSION PROJECT SENSITIVITIES

Sensitivity	Sensitivity Description
Transmission - Rio Sol Connection	This assumes the Rio Sol transmission project is available for consideration in the portfolio analysis.
Transmission - SunZia Connection	This evaluates portfolio outcomes with the SunZia transmission project available in the analysis.
Transmission - Blackwater Connection to SPP	This sensitivity models the Blackwater DC Tie transmission project when developing future resource portfolios.
Transmission - Rio Puerco – Four Corners Connection	This includes the Rio Puerco - Four Corners transmission project in the portfolio analysis.

7.2.3 STAKEHOLDER-REQUESTED SCENARIOS

In addition, stakeholders were invited to submit requests for additional changes to futures and sensitivities. This resulted in an additional twelve scenarios for analysis in the IRP; the detailed inputs of those scenarios are presented in Table 7-8 and the results and findings are included in Section 9.7.

TABLE 7-8. DESCRIPTION OF STAKEHOLDER REQUESTED SCENARIOS

Scenarios	Key Requirement	Assumptions
Scenario #1	HEG, Fusion	Includes nuclear fusion as a candidate resource based on cost and performance characteristics specified by stakeholders
Scenario #2	CTP, Geothermal	Applies stakeholder specified capital cost assumptions for candidate geothermal resources, including up to 50 MW of conventional geothermal at $5,100/kW and unlimited enhanced geothermal at $6,100/kW
Scenario #3	CTP, ETA Step Down	Requires a gradual reduction in the carbon intensity limit from 400 lbs/MWh in 2031 to 0 lbs/MWh by 2045
	HEG, ETA Step Down	Requires a gradual reduction in the carbon intensity limit from 400 lbs/MWh in 2031 to 0 lbs/MWh by 2045
	LEG, ETA Step Down	Requires a gradual reduction in the carbon intensity limit from 400 lbs/MWh in 2031 to 0 lbs/MWh by 2045
Scenario #4	CTP, High Natural Gas Price	Assumes higher natural gas prices (based on Siemens “High” commodity price forecast)
Scenario #5	CTP, High BTM Solar	Includes higher levels of BTM solar adoption
	CTP, High BTM Solar + TOU	Includes higher levels of BTM solar adoption and high participation of TOU rates upon demand profile
Scenario #6	CTP, High BTM Solar + TOU + Force Power Saver	Includes higher levels of BTM solar adoption, high participation of TOU rates, forced in Power Saver extension and water heater demand response programs with 25% increase in potential magnitude of both programs
Scenario #7	CTP, high BTM Solar + TOU + Force Power Saver + high Battery DLC	Includes higher levels of BTM solar adoption, high participation of TOU rates, forced in Power Saver extension and water heater demand response programs with 25% increase in potential magnitude of both programs, and significant increase in the potential magnitude of Battery DLC program
Scenario #8	CTP, Geothermal, LDES	PNM and stakeholders agreed that evaluation was already fully captured within the modeling framework of Scenario #2. No additional runs
Scenario #9	CTP, EDAM	Following technical discussions, PNM and stakeholders parties agreed this scenario was unnecessary and was not modeled

Scenarios	Key Requirement	Assumptions
Scenario #10	CTP, PRM	Doubles the summer import capacity over super peak from 50 MW to 100 MW in SERVM to get the reduced PRM. Updates the EnCompass™ modeling with the reduced PRM
Scenario #11	CTP, Geo + DR + SMR + no H_2 and CCS	Implements updated geothermal costs and high BTM solar + TOU + Battery DLC assumptions, adds ITC eligibility for geothermal and SMRs, delays SMR availability to 2040, and excludes hydrogen conversion and CCS technologies
Scenario #12	CTP, Geo + DR + SMR + no H_2 and CCS + no 2029 Gas	Includes updated geothermal costs and high BTM solar + TOU + Battery DLC assumptions, adds ITC eligibility for geothermal and SMRs, delays SMR availability to 2040, excludes hydrogen conversion and CCS technologies, and removes the 2029 172MW gas unit

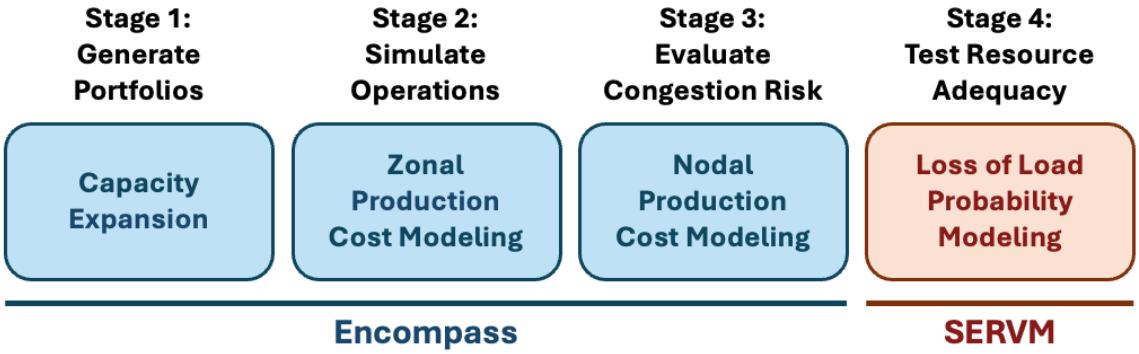
7.3 Modeling Methodology

PNM's 2026 IRP uses two commercial, industry-leading modeling tools: 1) EnCompass™, developed by Anchor Power Solutions which was acquired by Yes Energy in 2023, to produce the least-cost resource portfolio through long-term capacity expansion (LTCE) and production cost modeling (PCM), and 2) SERVM, a probabilistic reliability model developed by Astrapé Consulting which was acquired by PowerGEM in 2024, to establish system reliability needs and to evaluate resource adequacy of portfolios.

Pairing these tools enables PNM to evaluate a range of cost-optimal resource portfolios that satisfy regulatory, reliability, and environmental requirements over both the near and long term. EnCompass™ identifies the least-cost portfolio for each year of the planning horizon (2026–2045), subject to applicable policies and system constraints. Because optimizing resource decisions across multiple future years is computationally intensive, EnCompass™ evaluates a subset of representative days rather than the full range of possible operating conditions. SERVM complements this analysis by testing the reliability of candidate portfolios across hundreds to thousands of simulated weather years and system conditions, verifying that they meet PNM's reliability standards[43] under a wide range of potential futures. Together, EnCompass™ and SERVM provide an integrated planning framework that identifies optimal resource portfolios balancing affordability, reliability, and environmental objectives.

[43] PNM's reliability standard is a LOLE of 0.1 days per year, or one day in ten years.

FIGURE 7-2. MODELING TOOLS, FUNCTIONS, AND KEY OUTPUTS FROM PNM'S IRP ANALYTICAL PROCESS



Additional details comparing the purposes, methodologies, and key results produced by each model are shown in Table 7-9.

TABLE 7-9. COMPARISON OF MODELING TOOLS USED IN IRP

	LTCE	Zonal PCM	Nodal PCM	LOLP
Principle Purpose	Generate portfolios	Simulate bulk system operations	Evaluate transmission congestion risk	Test system resource adequacy
Modeling Horizon	20 years	20 years	20 years	Single year
Key Model Decisions	Investments & Operations	Operations	Operations	Operations
Transmission Representation	Zonal	Zonal	Nodal	Zonal
Load & Renewable Profiles	Deterministic	Deterministic	Deterministic	Stochastic
Temporal Representation	Hourly, 36 sample days per year	Hourly, all 8760 hours per year	Hourly, all 8760 hours per year	Hourly, all 8760 hours across 1000 samples
Geographic Scope	PNM Retail	PNM Retail	WECC System	PNM balancing area + Neighbors
Wholesale Markets	No	Yes	Yes	Yes
Key Outputs	Installed capacity by resource, NPV fixed costs	Annual generation by resource, NPV variable costs, emissions	Congestion	Loss of Load Expectation

	LTCE	Zonal PCM	Nodal PCM	LOLP
Scenario Application	All scenarios & sensitivities	All scenarios & sensitivities	Select scenarios & sensitivities	Select scenarios

TABLE 7-10. MODELING ACROSS SCENARIOS AND SENSITIVITIES

● Current Trends & Policy ● High Economic Growth ● Low Economic Growth

	LTCE	Zonal PCM	Nodal PCM	LOLP
Standard Assumptions	●●●	●●●	●●●	●●○
No Energy Transition Act	●●●	●●●	○○○	○○○
400 lbs/MWh through 2044	●●●	●●●	○○○	○○○
Federal CO2 tax in 2030	●○○	●○○	○○○	○○○
High electric vehicles	●○○	●○○	○○○	○○○
Time-of-use rates	●●●	●●●	○○○	○○○
Extreme economic growth	○●○	○●○	○○○	○○○
Late long-duration storage maturity	●●○	●●○	○○○	○○○
No new natural gas resources	●○○	●○○	○○○	○○○
Transmission – Rio Sol Connection*	○○○	●●○	●○○	○○○
Transmission – SunZia Connection*	○○○	●●○	●○○	○○○
Transmission – Blackwater DC Tie*	○○○	●●○	●○○	○○○
Transmission – Four Corners Connection*	○○○	●●○	●○○	○○○

**Transmission sensitivities conducted using LTCE results from Standard Assumptions modeling*

7.3.1 CAPACITY EXPANSION

EnCompass™ is an optimal capacity expansion and production cost simulation model developed and maintained by Yes Energy. In the 2026 IRP, PNM uses EnCompass™ for two functions:

- **LTCE**: EnCompass™ produces least-cost portfolios of resources to meet future load, reliability, and emissions reduction needs, subject to constraints on reliability, operating parameters of each resource, and environmental and regulatory requirements.
- **PCM**: EnCompass™ simulates the hourly operations for each portfolio across all 8,760 hours of the year for the full planning horizon. The model captures detailed constraints on dispatch, unit commitment, and transmission limitations to quantify the cost of operating the system to meet PNM's load.

For the 2026 IRP planning process, EnCompass™ capacity expansion module identifies least-cost portfolios of resources for a planning horizon of 2026 to 2045. The model selects a portfolio

which minimizes the objective function, the sum of all costs included in the optimization, reflecting the NPV of projected system costs over the study window, including existing and new resources and transmission related costs needed to deliver future resources to loads. Each optimization is subject to constraints, certain requirements that the portfolio must meet, such as but not limited to the PRM, RPS requirement and CO_2 emission targets.

EnCompass™ modeling functionality is foundational to PNM's ability to identify a plan. Several of the most important features of EnCompass™ used to develop the plan are described below.

TABLE 7-11. DESCRIPTION OF KEY FUNCTIONALITY OF ENCOMPASS™ CAPACITY EXPANSION MODEL

Modeling Functionality	Details
Cost Minimization	EnCompass™ is a constrained optimization model, meaning that it seeks to identify a portfolio of resources that minimizes an objective function representing PNM's costs to serve future loads while meeting defined constraints (e.g. reliability, ETA requirements, physical limits). The objective function for the capacity expansion model is the net present value of future generation and transmission costs (where applicable), including fixed costs of new investments (e.g. capital, fixed O&M) and variable costs of serving load (fuel, variable O&M) throughout each year. This ensures that each portfolio generated reflects the solution with the lowest cost to PNM's customers, subject to constraints.
Planning Reserve Margin Constraint	In each year of the capacity expansion model, the PRM constraint ensures that PNM's existing resources plus new resources selected by the model supply enough accredited capacity to meet PNM's PRM requirement. This constraint ensures that each portfolio generated meets PNM's standards for resource adequacy throughout the horizon.
Dynamic ELCC Curves	An important capability of the EnCompass™ model is the ability to represent dynamic ELCC curves for variable (wind, solar) and energy-limited (storage) resources to quantify their contribution to PNM's reliability needs. Modeling a dynamically changing ELCC is important for determining the optimal portfolio that ensures reliability, since marginal ELCCs for each resource change as more is added to the system. EnCompass™ tracks how marginal ELCCs change, capturing saturation effects (i.e. declining marginal ELCCs) as more wind, solar, and storage are added to the portfolio.
Endogenous Hourly Dispatch	EnCompass™ simulates the hourly system dispatch of the portfolio across a subset of sample days to ensure a load and resource balance. Renewable resources in EnCompass™ are represented with hourly profiles to capture availability that varies across time of day and seasons and different locations. Hourly system dispatch also allows for explicit modeling of storage operations, including charging and discharging patterns, and dispatchable resources which can be brought online as needed to serve load.
Environmental Constraints	EnCompass™ has the capability to ensure portfolios are compliant with all of the environmental requirements associated with the ETA, including: 1) 50% and 80% RPS requirements in 2030 and 2040, respectively; 2) 200 lbs/MWh carbon intensity limit in 2032 and thereafter; and 3) 100% carbon-free generation portfolio in 2045

Modeling Functionality	Details
	These constraints are included in all scenarios and sensitivities except the Policy and Regulatory sensitivities that test alternative requirements.
Explicit Modeling of Hydrogen Production and Storage	Hydrogen was modeled as a potential carbon-free fuel for existing natural gas infrastructure beyond 2044. A delivered hydrogen fuel cost of $21.36/MMBtu in 2045 was assumed based on EPRI data, including production, renewable energy, electrolyzer, and local pipeline delivery costs. Electrolyzer capital costs were amortized over one year, and no federal tax credits or incentives were assumed.

Emission Constraints

For each portfolio, EnCompass™ evaluates whether the emission constraint is met by taking the total CO_2 emissions from PNM generation in the given year, and dividing it by PNM's total generation. This is the same methodology used to determine PNM's ETA compliance between 2023 to 2025 in its reporting requirements with NMPRC. PNM's total generation will often exceed retail sales because of losses in transmission and distribution, storage round-trip efficiency, along with market transactions. Additionally, the ETA defines the CO_2 emission compliance rate to be met based on an average rate over a three-year period, while EnCompass™ enforces the constraint for every year of the planning horizon.

Under this accounting regime, short-term wholesale market transactions are not directly considered in determining PNM's carbon intensity. To design portfolios that comply with the spirit and requirements of the ETA and do not rely excessively on short-term purchases, PNM does not allow for market purchases or sales in the capacity expansion step of the analysis. This approach ensures that PNM's portfolio includes enough resources to serve its loads while also complying with the requirements of the ETA. A key element in the design of portfolios is that each can meet the objectives of the ETA.

Under the ETA, PNM is not required to attribute carbon emissions to short-term wholesale market purchases. Because wholesale market purchases are included in the production cost modeling, the resulting emissions attributed to PNM's portfolio may be understated depending on real-world conditions. By focusing on emission outputs produced by the capacity expansion model, PNM ensures that the portfolios developed in the IRP can meet future requirements regardless of the availability of short-term wholesale market purchases, which is inherently uncertain.

7.3.2 Zonal Production Cost Modeling

Capacity expansion modeling is the first step in determining the cost-optimized portfolios. By locking-in those portfolios, more granular projections of cost and performance of resource portfolios are simulated. Production simulations in PNM's IRP are performed down to the hourly level over the 20-year planning horizon and is necessary to understand system operations across all hours of a year, capturing a wide range of projected weather conditions impacting load and renewable resource generation, and effects on the system cost, generation, and emissions.

Production cost simulation modeling in EnCompass™ reflects PNM's obligation to maintain an adequate load and resource balance in real time, consistent with NERC reliability standards. The production cost simulation dispatches resources according to the following steps, consistent with real-world operations:

- Schedule must-run resources such as nuclear, geothermal, wind, solar, and any other resources needed to run at their expected output.
- Additional resources are dispatched (or curtailed) economically to serve demand and energy needs, while minimizing costs to operate the portfolio.
- Generation is also committed to meet operating reserve requirements to help preserve reliability of the system.
- Carbon emitting resources are dispatched so that annual emissions are optimized within targeted amounts to meet ETA requirements.

In addition, the production simulations allow for interactions with neighboring wholesale markets to reflect opportunities to reduce customer costs with short-term market purchases and sales. Under ETA's rules, short-term market purchases do not count towards PNM's carbon intensity, and so in circumstances where the production simulation model chooses to buy from the market instead of dispatching PNM's own natural gas resources, the apparent emissions intensity of PNM's portfolio may appear lower than in the capacity expansion model runs.

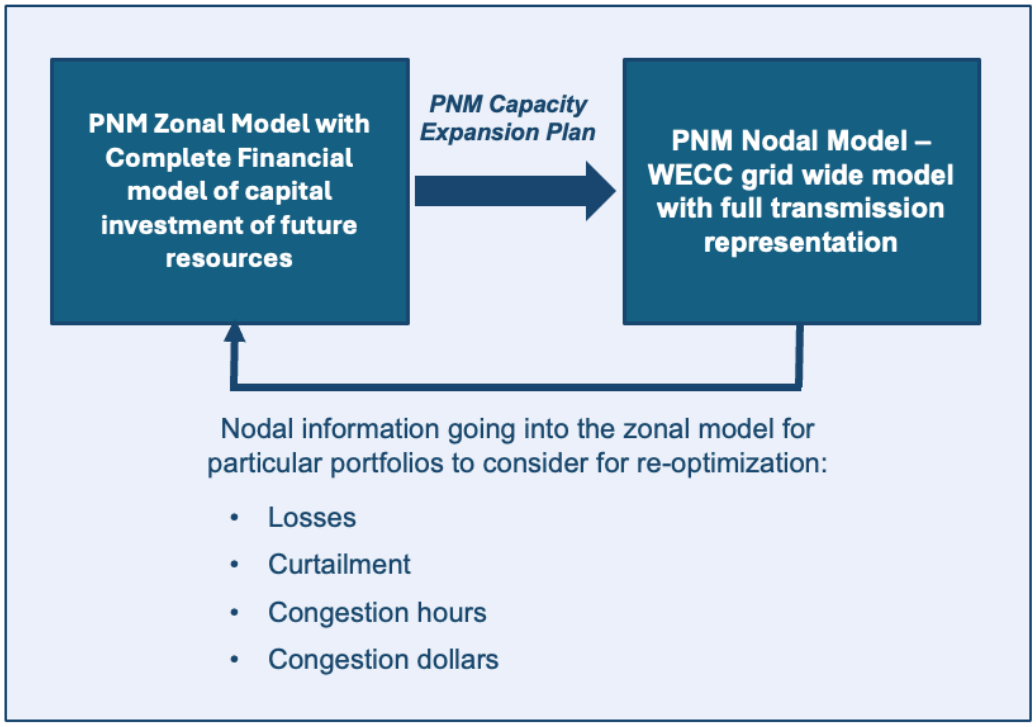
Zonal Transmission Cost Adder Methodology for New Resources

In past PNM IRP planning cycles, transmission cost adders were based on historical interconnection locations and estimated integration costs. For this IRP, a nodal model was introduced to validate the location assumptions used for generic candidate resources that were selected in the zonal capacity expansion model. The review process followed four steps:

1. Export the CTP, HEG, and LEG base future capacity expansion plans from the zonal model.
2. Assign specific transmission system locations to each resource in the nodal model.
3. Run a production cost dispatch in the nodal model, observing curtailment and congestion for each portfolio.
4. Adjust the zonal model for the specific resource locations where congestion or curtailment was observed, and re-run the zonal capacity expansion model to produce the final portfolios.

Figure 7-3 below illustrates this cycle between the zonal and nodal models for developing zonal Cost adders. Developed zonal transmission adders are listed in Section 8.7.

FIGURE 7-3. RELATIONSHIP BETWEEN PNM'S ZONAL AND NODAL MODELS



7.3.3 NODAL PRODUCTION COST MODELING

The inclusion of nodal production cost modeling as a complement to zonal production cost modeling in the 2026 IRP is a novel development within the planning framework. PNM's nodal model differs from its zonal counterpart in several important ways:

- **Explicit physical modeling of the transmission system:** PNM's nodal model includes a detailed representation of the transmission network, including 855 nodes and 914 transmission elements in PNM's BAA. The nodal modeling includes a DC power flow representation of transmission flows to capture the real-world characteristics of these elements.
- **Broader geographic scope:** in contrast to the zonal model which includes PNM's retail loads and the associated generation portfolio, the nodal model is a West-wide model that includes a representation of all loads and resources in the PNM BAA and neighboring systems. This broader geographic scope is necessary to model physical flows across the transmission network realistically.

Challenges Combining Nodal Production Cost Models with Capacity Expansion Modeling

Combining nodal production cost models with capacity expansion modeling for a full financial picture raises two categories of challenges. First, technical tractability: nodal model's bus-level detail is rarely feasible across a long, multi-scenario planning horizon, forcing reliance on zonal aggregation or representative days that weaken transmission congestion tied to third-party use of

the transmission system. Second, linking physical results to financials: nodal models produce dispatch and price outputs but not debt, tax, depreciation, or equity data, requiring a separate financial layer that can drift out of sync with operational results.

Nodal Model Development for IRP

PNM selected the Horizon data offering available through the Yes Energy EnCompass™ platform. Under this approach, Horizon Energy, LLC develops a comprehensive dataset by compiling publicly available information from published sources and Yes Energy formats and provides the information to map resources to the transmission nodes in the nodal model. PNM then worked to refine the delivered database by providing historical operating data to refine the model. This included research into neighboring utilities and their future resource plans.

Zonal Capacity Expansion to Nodal Modeling Methodology

Unlike the 2023 IRP, which embedded zonal transmission cost adders into the initial capacity expansion run, the 2026 IRP runs the first EnCompass™ zonal capacity expansion pass "clean," with no locational cost penalty. This produces a location-neutral candidate portfolio specifying only technology type, capacity (MW), and year added, for example, 200 MW solar in 2033, 400 MW wind in 2035, and 300 MW solar in 2040, with no assigned node or zone.

PNM then performs a location assignment step, mapping each technology to specific real-world transmission nodes based on historical siting patterns (e.g., solar to Four Corners 345 kV, wind to Western Spirit 345 kV). Siting assumptions vary by technology and location, solar is concentrated around Albuquerque, San Juan/Four Corners, Belen/Los Lunas, and Eastern NM; wind in Eastern NM carries higher transmission costs in several counties; geothermal sites remain undetermined and are typically distant from existing PNM facilities; pumped storage is assumed near San Juan/Four Corners; and CAES in Southeast New Mexico carries significant transmission cost implications.

These node-assigned resources are added to the full nodal transmission model, generating four evaluation outputs: losses, resource curtailment, congested hours, and congestion costs. This step captures system interactions the zonal model cannot: it reveals whether neighboring transmission operations adversely affect the proposed portfolio, and whether the transmission alternative scenarios lower costs by providing access to remote markets that enable more efficient portfolio dispatch. This is arguably the most important structural benefit of nodal analysis, since over 50% of PNM's transmission utilization serves wholesale wheeling by external customers, the nodal model closes this gap by representing the broader WECC grid, including neighboring load-serving entities and their resources.

7.3.4 Loss-of-Load-Probability Modeling

For select scenarios, detailed reliability analyses using SERVM follows the capacity expansion and production simulation in EnCompass™. The reliability analysis performed in SERVM is a traditional LOLP study which verifies that the portfolios are reasonably close to a LOLE standard of 0.1 days per year, the equivalent to one day in ten years. The LOLP study examines the portfolio's performance across a wide range of weather conditions, load variability and resource

availability representing hundreds or thousands of years. If the resulting portfolio LOLE standard is not met, SERVM results inform adjustments to the portfolio (e.g. adding additional capacity) that would be required to achieve the standard.

8. New Resource Options

Chapter Highlights

1. PNM's 2026 IRP considers an expansive range of technologies to meet future customer needs, including demand-side resources, renewable resources, storage resources, and investments in new transmission.
2. Demand-side resources (energy efficiency and demand response) are modeled consistently with supply-side options to evaluate them on a level playing field. This allows the IRP to expand or contract demand-side programs.
3. To meet remaining needs, PNM also considers emerging firm technologies such as long duration storage and hydrogen-ready generators.
4. The economics of all new resource options are evaluated based on forecasted costs to build, operate, and maintain them. For certain options, the price of fuel (natural gas or hydrogen) or other market signals (import and carbon prices) influence their cost effectiveness.

To fill future resource needs, as PNM plans toward a carbon-free future, the types of resources needed to ensure resource adequacy will include a diverse mix of technologies and capabilities. Table 8-1 summarizes candidate resources and the categories that PNM has determined for each resource. The following categories describe the resource types:

Table 8-1. Details on Resource Option Types

Resource Option Type	Primary System Role	Key Technologies & Capabilities
Carbon-Free Energy	Produce clean energy, reduce annual customer demand, or provide cost-effective energy/capacity to meet statutory mandates while lowering overall system costs.	Wind, solar, and energy efficiency programs.
Dynamic Balancing	Provide accredited capacity (or reduce demand) to meet resource adequacy requirements and balance supply/demand in real-time operation.	Demand response, and short-duration energy storage (8 hours or less).
Firm Dispatchable	Operate at full capacity, at will, for extended periods to maintain grid stability during constrained system conditions.	Natural gas generation, pumped hydro, enhanced geothermal, long-duration energy storage (e.g., iron-air batteries), small modular nuclear reactors, and hydrogen-ready combustion turbines.

Candidate resource options in this IRP are also defined by the maturity of each technology, where mature resources that have been commercially available for many years make up the majority of future resource options. Resources that are nascent and emerging in nature are also evaluated to serve resource needs for this IRP. Table 8-2 below shows the candidate resources by two development level categories.

TABLE 8-2. CANDIDATE RESOURCES BY TECHNOLOGY CATEGORY

Resource	Mature Technology	Emerging Technology
Carbon Free		
Energy Efficiency	☑	
Solar - Photovoltaic	☑	
Wind	☑	
Dynamic Balancing		
Battery Storage (4 hr)	☑	
Battery Storage (8 hr)	☑	
Compressed Air Energy Storage		☑
Demand Response	☑	
Firm Dispatchable		
Combustion Turbine (heavy frame)	☑	
Combustion Turbine (aero)	☑	
Combined Cycle	☑	
Combined Cycle with Carbon Capture	☑	
Linear Generator		☑
Geothermal	☑	
Enhanced Geothermal		☑
Iron Air Energy Storage		☑
Pumped Hydro	☑	
Nuclear Small Modular Reactor		☑

Ownership of new resources may follow three different models: a “utility self-build” project is one that the utility constructs and operates on its own. A “build-transfer” or “turnkey” project is one that is developed by a third party, often an independent power producer, and then sold to the utility to own and operate. A third approach is for PNM to purchase the output from a generator or set of generators over a contracted period through a PPA. Each of these options has specific benefits, however each one presents risks and uncertainties worth considering when making procurement decisions.

Specific to the triennial IRP planning process, PNM does not evaluate specific ownership structures, and instead, compares and evaluates all resources under a framework that is agnostic to ownership. To efficiently evaluate projects via its modeling software, a utility ownership finance structure is utilized across all resource options. This approach is not meant to show a preference for utility ownership, but rather to ensure all technologies are considered on a level playing field using a consistent set of financing assumptions.

Additionally, EnCompass™ incorporates federal investment tax credits for eligible energy storage resources by calculating the applicable tax credit based on the resource's installed cost in the year the project is selected. Storage resources selected between 2026 and 2033 receive a 30% ITC, declining to 22.5% in 2034, 15% in 2035, and 0% thereafter. The value of the tax credit is determined as a percentage of the resource's installed capital cost ($/kW) and is then amortized over the remaining life of the project and reduces the annual revenue requirements. Furthermore, capital costs and operating characteristics for supply-side candidate resources and the methodology used to develop future cost curves can be found in Appendix K.

8.1 New Demand-Side Resources

In addition to supply-side resources, PNM evaluated a wide range of demand-side resources to help identify the optimal mix of resources in its planning process. To support this effort, an EE and DR potential study was conducted by PNM, with support from the consultant ICF, to provide a comprehensive, data-driven assessment of available demand-side resource options and their role in serving future system requirements. The study evaluated both EE measures and a broad set of DR program options, including rates and EV programs, across customer segments along with estimated achievable energy savings and peak demand reductions over the planning horizon. The potential study helped inform the IRP process by identifying incremental demand-side opportunities that can compete with or complement supply-side resources, support system reliability, and meet resource adequacy needs.

Key Terms

Programs refer to existing or PNM-planned EE and DR programs implemented during the statutory period to comply with the requirements established by the EUEA.

EE bundles represent groups of energy efficiency measures that are beyond the statutory programs and are modeled as candidate resources. These bundles capture additional EE opportunities that may be selected by the model.

Candidate DR programs represent a set of demand response options designed to capture potential demand response opportunities across multiple customer segments and enabling technologies.

8.1.1 Energy Efficiency

In keeping with PNM's carbon-free goal, future EE measures are considered beyond the requirements established by the EUEA as a new resource option, building upon the methods used in the 2023 IRP to characterize EE as a candidate resource option in capacity expansion

modeling. Candidate EE resources are bundled into similarly priced groups of different measures, which are considered by the model alongside supply-side resources. Allowing these EE bundles to be chosen by the model indicates the extent to which EE measures above and beyond the statutory amount can be a competitive solution along with supply-side resources.

To enable modeling EE as a resource, PNM contracted with ICF to develop hourly supply curves representing program potential. The process to develop these bundles consisted of the following steps:

1. Calculate "achievable technical" potential for EE within PNM's service territory. Based upon the updated Residential Appliance Saturation Study, calculations were performed to determine what is technically and economically feasible, then narrowing it to an achievable amount based on expected adoption rates. This method is used to calculate the total potential, rather than solely focusing on least-cost outcomes.
2. Define a set of statutory EE programs based on requirements to meet the EUEA for 2027-2029. These programs are included in PNM's triennial filing with the New Mexico Public Regulation Commission and are automatically included in the portfolio to comply with the EUEA targets.
3. Define programs of EE measures (EE bundles) beyond the EUEA's minimum requirements by grouping measures with similar levelized costs of conserved energy. These EE bundles are provided as candidate resources that the model may select, after the completion of the remaining steps.
4. Calculate annual incremental energy savings, weighted average cost, and measure lifetime for each bundle based on the included measures.
5. Develop hourly impacts for each bundle by spreading measure-level impacts over calibrated end use load shapes.

While this general approach is consistent with the methods used in the last IRP, this IRP process has made several enhancements to the modeling assumptions. Namely:

- The grouping of the measures was updated by compressing the ranges to simplify the modeling and reduce the number of options considered. These measures are then grouped by cost: Up to $75/MWh bundle; followed by a bundle with the cost range of $75-125/MWh; and a final bundle represents measures with a cost above $125/MWh;
- The statutory EE programs for 2027-2029 were calibrated to align with PNM's EE and LM program plan filling;
- An average line loss factor of 6.8% was applied to all EE bundles in the post statutory period; As a result, EE resources offset a greater amount of generation, reducing system energy requirements and enhancing the relative value of EE within the resource planning process;

Transmission and distribution avoided costs attributable to energy efficiency were assessed and applied to all EE programs and bundles based on the Avoided Cost of Transmission and Distribution Capacity Study performed in 2026, as shown in Figure 8-1. These values are entered

as a negative fixed cost stream in the model, which represent a benefit (cost reduction), and were further adjusted using the effective load carrying capability of energy efficiency, as provided by PowerGEM, to reflect the likelihood that EE resources are available during system peak conditions.

FIGURE 8-1. EE T&D AVOIDED COST ADDERS

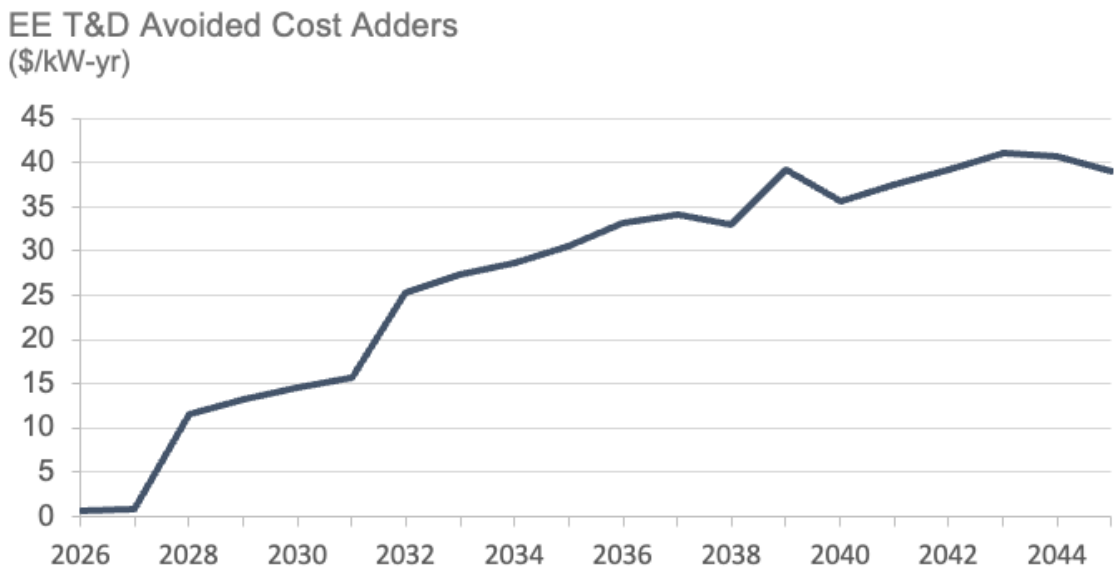


Figure 8-2 summarizes the EE programs and bundles modeled in this IRP; additional details on the characteristics are provided in the EE and DR potential study. The efficiency measures designated as “Program” is planned energy efficiency required by statute – these programs are included by default across all scenarios. The relatively small amount of potential in the “Up to $50” bundle in these years reflects the fact that most low-cost opportunities for energy efficiency have been exhausted by current programs. The “$50 and Up” bundle represents additional potential that faces greater economic and/or market barriers than the potential found in the “Program” and “Up to $50” bundles.

During the statutory period, PNM models the EE programs included in its EE and LM program plan filings as fixed resources to the EnCompass™ model. Incremental EE bundles beyond these statutory programs, such as the “Up to $50” and “$50 and Up” bundles, are not available for selection during this period. In the post-statutory period, however, the model is permitted to select any of the EE bundles shown in Figure 8-2, allowing additional energy efficiency resources to compete with other resource options in the optimization. If a bundle is selected, its savings persist for the duration of the bundle’s lifetime.

FIGURE 8-2. ENERGY EFFICIENCY BUNDLES

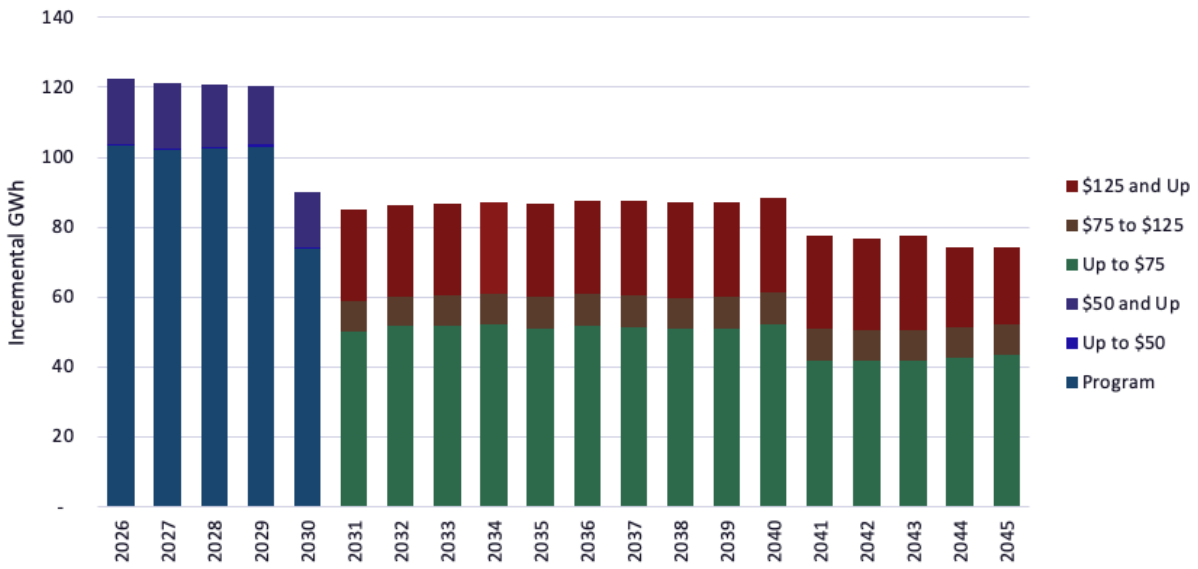


TABLE 8-3. SUMMARY OF EE MODELING INPUTS

Modeling Characteristics (2031) for Energy Efficiency Bundles			
	Up to $75	$75 to $125	$125 and up
Annual Energy Savings (GWh)	50	8	26
Peak Reduction (MW)	20	5	23
Levelized Cost ($/MWh)	27	108	284
Average Life (Years)	15	18	13
ELCC (%)	50	50	50

8.1.2 Demand Response

Demand Response Potential Options

Stakeholder Input: Prioritizing increased demand-side resource options

During the 2023 IRP, stakeholders shared feedback that PNM could further expand its evaluation of demand-side resources in future IRPs. In particular, there was interest in exploring additional demand response options and better reflect how program costs may change over time, rather than remaining fixed.

In response to this feedback, PNM, in collaboration with ICF, expanded the modeling approach to include nine distinct and selectable demand-side options. These potential options are designed to better reflect real-world conditions, with costs that vary from year to year based on customer participation, which may increase or decrease over time.

In the 2026 IRP, PNM developed new approaches to identify and evaluate additional DR programs, beyond its existing LM programs, Peak Saver and Power Saver. PNM engaged ICF to conduct the EE and DR Potential Study to support its resource planning efforts. For the purposes of the IRP, PNM included all DR potential programs identified in the potential study, regardless of cost or total energy impacts, and allowed the EnCompass™ model to determine the optimal selection of resources based on system needs and economics. To enable modeling of the demand response potential programs, ICF followed the process below to determine candidate DR programs:

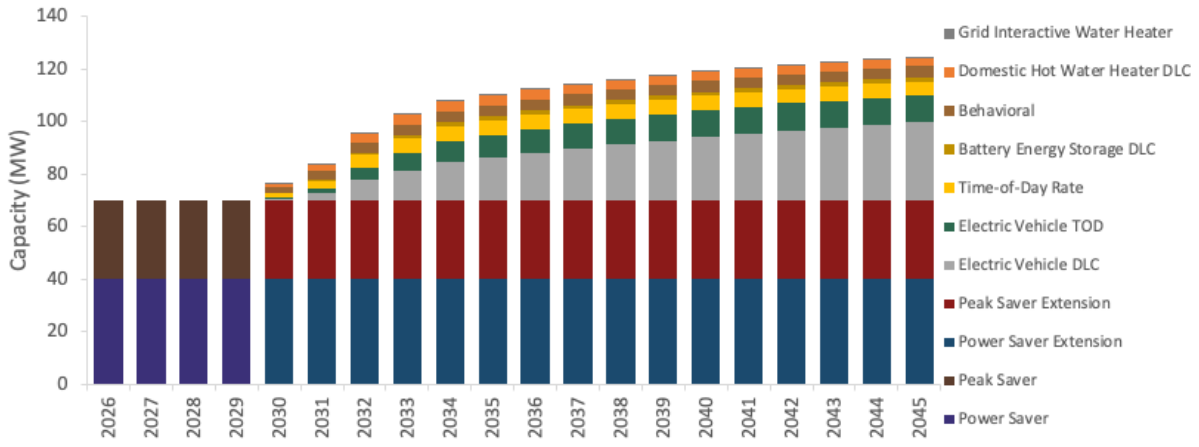
1. Data Collection: ICF compiled data from a range of sources, relying primarily on the Northwest Power and Conservation Council's 2021 Power Plan to inform DR program characteristics using regional data. Additional sources used to support the development of demand response potential include the PNM Energy Efficiency 2025 Annual Report (Docket No. 23-00138-UT) and the 2024 Evaluation of Energy Efficiency and Load Management Programs report (Docket No. 23-00138-UT).
2. Program Characterization: Where available, ICF incorporated data specific to PNM's service territory to inform key assumptions related to program participation, impacts, and costs. The Northwest Power and Conservation Council's 2021 Power Plan was used to define sector eligibility for each DR potential program. For potential programs requiring enabling technologies, ICF applied equipment saturation forecasts derived from PNM's energy efficiency portion of its latest energy efficiency and demand response potential study. To prevent double counting of load reductions across overlapping potential programs, ICF worked with PNM to establish a program hierarchy.
3. Baseline Peak Demand Forecast: ICF developed a peak demand forecast based on the system-level peak demand projections from PNM's energy efficiency portion of potential

study. These projections were then disaggregated by sector and customer class using PNM-provided customer data and market segmentation outputs.

4. Potential Estimation: ICF estimated DR potential for each potential program by determining the eligible customer population based on enabling technology saturation and adjusting for participation in higher-priority programs within the hierarchy, applying participation rates, attrition, and event performance assumptions to estimate program adoption, and calculating total demand impacts by multiplying per-customer demand reductions by the number of participating customers across the forecast horizon. Program adoption, and therefore potential savings, is assumed to ramp up over time, reflecting factors such as customer awareness, program marketing and outreach, and technology maturity and complexity.
5. Cost Evaluation: ICF calculated levelized costs over the full forecast period (2026–2045), assuming program operation in both summer and winter peak periods. While levelized costs are presented for comparative purposes, PNM modeled DR resources in the IRP using annualized fixed costs that vary over time with participation levels. Additional detail on cost development is provided in the EE and DR potential study.

Under this approach, a total of nine DR options were identified for inclusion in the modeling database. This amount includes two extensions of existing programs (Peak Saver and Power Saver) and seven new potential DR programs developed by ICF. The maximum capacity of these DR options during the planning period are shown in Figure 8-3.

FIGURE 8-3. TOTAL CAPACITY OF DEMAND RESPONSE POTENTIAL PROGRAMS



In PNM's 2027–2029 EE and LM program plan filing (Docket No. 26-0000074), the two existing DR programs, Peak Saver and Power Saver, are expected to continue through 2029. Beginning 2030, however, continuation of these programs is not guaranteed due to having to obtain NMPRC reapproval every three years. The IRP does not assume that these programs will automatically persist beyond 2029. Instead, they are treated as candidate resource options beginning in 2030 that can compete with other supply-side and demand-side resources. As a result, both programs are modeled with the option to continue through the end of the planning horizon (2030–2045). The subsequent sections describe each DR program in detail.

Peak Saver Extension

The Peak Saver Extension program provides peak load reduction during periods of high system demand through the curtailment of customer-sited loads. Curtailment strategies are tailored to each participating facility and may include control of lighting, HVAC, refrigeration, pumps, and other eligible equipment.

The Peak Saver Extension is applicable to medium and large commercial and industrial customers with loads of 150 kW or greater. This demand response potential option is modeled as available year-round, with up to 100 hours of availability during the summer and up to 300 hours during the remainder of the year, for a total not to exceed 400 hours annually. Individual events are limited to a maximum duration of 4 hours. The extension of this program is first assumed to be available beginning in 2030.

Power Saver Extension

The Power Saver Extension program provides peak load reduction during periods of high system demand through the curtailment of customer-site loads. Curtailment is achieved through direct control of refrigerated air conditioning systems, typically by cycling the air conditioner to reduce overall system load.

The Power Saver Extension is applicable to residential, small commercial, and medium commercial customers. This DR potential program is modeled as available and affordable during the summer months, consistent with the current program design. The resource has up to 100 hours of availability during the summer season, with individual events limited to a maximum duration of 4 hours. The program extension is first assumed to be available beginning in 2030.

Battery Energy Storage Direct Load Control

Battery energy storage DLC leverages customer-sited battery energy storage systems to shave load through utility-directed dispatch during system peak periods or grid stress events. Participating batteries are controlled to reduce the peak demand by either deferring battery charging or discharging the stored energy.

Battery energy storage DLC potential program is assumed to be applicable to residential, commercial, and industrial customers and operates during both summer and winter seasons. The program can be dispatched for up to 35 hours in the summer and 30 hours in the winter. The first year of expected availability is 2030, reflecting the level of market maturity and the development of a technically feasible and affordable program structure.

Domestic Hot Water Heater Direct Load Control

This potential program enables DR through the installation of a DLC switch on participating customers' domestic hot water heaters. During peak periods or system events, PNM can temporarily interrupt or defer water heating to reduce system demand. The thermal storage capability of water heaters allows load reductions to be delivered with limited customer impact.

Domestic hot water heater DLC potential program is designed for residential customers during both summer and winter seasons. The program can be dispatched for up to 100 hours in the

summer and 100 hours in the winter. The first year of expected availability is 2030, reflecting the level of market maturity and the development of a technically feasible and affordable program structure.

Grid Interactive Water Heater

This program utilizes water heaters equipped with integrated communication ports to enable bidirectional communication between the device and the utility. Through this communication, PNM can adjust, delay or advance water heating by turning the devices on and off in response to system conditions. This is different with the direct load control which only allows devices to be turned off.

Grid-Interactive Water Heaters are modeled as a residential DR potential program available in both the summer and winter seasons. This program is modeled as a resource which may be dispatched for up to 100 hours in the summer and 100 hours in the winter, for a maximum of 200 hours annually, with no single event exceeding 4 hours. The first year of expected availability is 2030, reflecting the level of market maturity and the development of a technically feasible and affordable program structure.

Time-of-Day Rate

Time-of-Day is a rate structure that applies higher prices to one or two defined peak periods within a day and lower prices during all other periods, encouraging customers to shift electricity usage away from peak periods and reduce system peak demand. At PNM, this concept is implemented through the TOD pilot program described in Section 3.3. The TOD demand response potential program is a scaled-up application of the TOD pilot, transitioning from a pilot to broader implementation.

TOD is a year-round program and is modeled as a load modifier for residential, commercial, and industrial customers. The first year of expected availability is 2030, reflecting the rollout of advanced metering infrastructure deployment.

Electric Vehicle Direct Charge Management

EV Direct Charge Management builds on PNM's transportation electrification efforts in active managed charging. This program allows PNM to manage EV charging behaviors to postpone or curtail charging during peak demand periods, shifting load to off-peak hours while maintaining customer charging needs and supporting system peak management.

Electric vehicle direct charge management is modeled as a residential potential program that can be called year-round. The program is limited to 80 hours annually, with 40 hours allocated to the summer and 40 hours to the winter. The first year of availability is assumed to be 2030, reflecting the time needed for customer adoption and the development of a technically feasible and affordable program structure.

Electric Vehicle Time-of-Day

This program uses TOD rate to encourage customers to shift EV charging to off-peak hours through defined charging periods, reducing peak demand impacts while preserving customer

charging flexibility. The program builds on PNM's EV charging pilot rates which is introduced in Section 3.3.3. This pilot supports near-term participation and is assumed to transition into a successor TOD rate design around 2030, which will continue to provide price signals to guide EV charging behavior in the long term.

Electric vehicle TOD is a year-round program and is modeled as a load modifier for residential customers. The first year of expected availability is 2030, reflecting time needed for customer adoption and the rollout of AMI deployment.

Behavioral

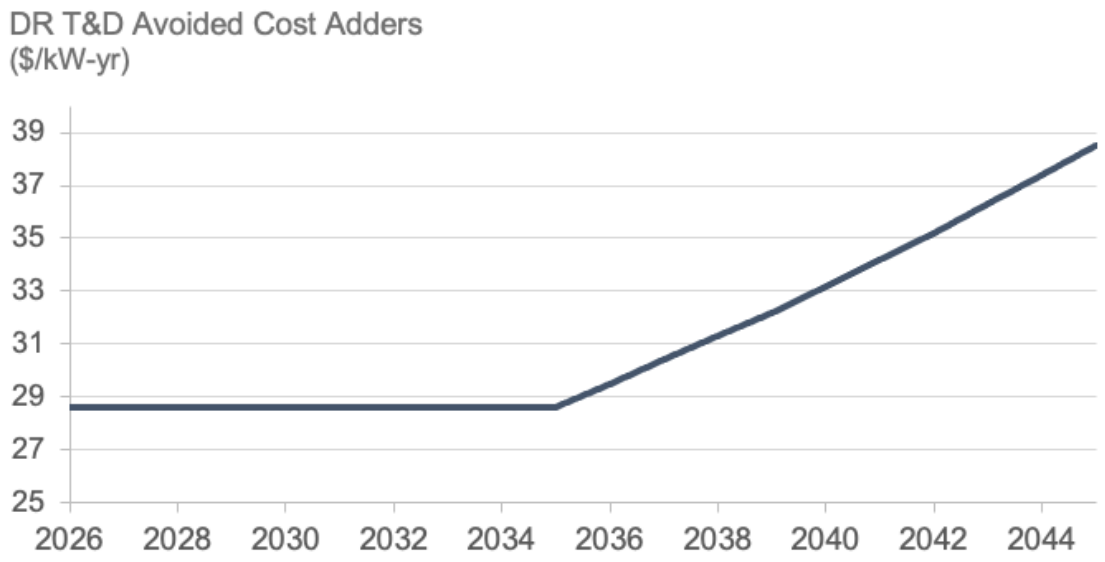
Behavioral potential programs are voluntary DR programs that encourage customers to reduce electricity usage during peak periods in response to behavioral messaging, such as notifications, alerts, or conservation prompts. Load reductions are then achieved through customer action rather than direct utility control.

Behavioral is modeled as a residential program that can be called year-round. The program is limited to approximately 11 events per year, with individual events lasting between 3 and 5 hours. Total annual event hours are capped at approximately 40 hours. The first year of expected availability is 2030, reflecting the rollout of AMI deployment.

For the 2026 IRP, three adjustments are made to the modeling inputs based on the results of the potential study.

1. An 8% incentive is applied to DR program costs (excluding TOD, EV-TOD, and EV direct charge management), consistent with PNM's EE and LM program plan filing and aligned with the requirements of the EUEA, to reflect PNM's opportunity to earn on these investments.
2. Inclusion of avoided cost adders informed by the results of The Avoided Cost of T&D Capacity Study. These adders were modeled for all DR programs and potential programs and are presented in Figure 8-4. For the early portion of the study period through 2035, a levelized cost value was applied and then escalated at an annual rate of approximately three percent. These values are entered as a negative fixed cost stream in the model, which represent a benefit (cost reduction), and were further adjusted using the ELCC of demand response, as determined through the study work performed by PowerGEM, to reflect the probability that DR resources are available during system peak conditions. Additional details regarding the ELCC study results are provided in Appendix M of this report.

FIGURE 8-4.DEMAND RESPONSE TRANSMISSION AND DISTRIBUTION AVOIDED COST ADDERS[44]



Beginning in 2030, all modeled DR potential programs are treated as candidate resources. Once selected, the potential DR program is assumed to operate for its full lifetime, with ramp-up periods applied to most potential programs to reflect gradual market adoption. Their cost and attributes are summarized in Table 8-4 and Table 8-5. The detailed assumptions regarding these DR programs can be found in the EE and DR potential study.

In these programs, Peak Saver Extension and Power Saver Extension represent the continuation of Peak Saver and Power Saver programs included in PNM's 2027-2029 EE and LM filing. Beginning in 2030, these programs are modeled as candidate resource options and will be determined whether they are selected to continue beyond the statutory period.

The remaining DR programs are evaluated for the first time in this IRP and are modeled using a distinct framework. These programs first become available for selection in 2030. If a program is not selected in 2030, it remains available for selection in 2035, 2040, or 2045. Once selected, the program's first-year potential is assumed to be equal to its 2030 potential, and its future potential follows the same ramp-up trajectory that would have applied had the program been selected in 2030.

TABLE 8-4. DR POTENTIAL PROGRAM CAPACITY AND COST

DR potential programs	2030 Max Capacity (MW)	2045 Max Capacity (MW)	2030 Fixed O&M ($000)	2045 Fixed O&M ($000)
Battery Energy Storage DLC	0.1	1.8	$59	$258
Behavioral	2.1	4.3	$408	$1,153
Domestic Hot Water Heater DLC	1.1	3.0	$1,826	$3,155

[44] "Avoided Cost of Transmission and Distribution Capacity Study." Demand Side Analytics. March 2026. Available at https://www.pnm.com/documents/d/pnm.com/pnm-avoided-t-d-study-final-pdf

DR potential programs	2030 Max Capacity (MW)	2045 Max Capacity (MW)	2030 Fixed O&M ($000)	2045 Fixed O&M ($000)
EV Direct Charge Management	0.7	29.6	$692	$19,158
EV-TOD	0.6	10.1	$222	$62
Grid Interactive Water Heater	0.0	0.1	$14	$93
Peak Saver Extension	30	30	$5,807	$7,933
Power Saver Extension	40	40	$8,440	$14,755
TOD	1.2	5.3	$594	$217

TABLE 8-5. DR POTENTIAL PROGRAM ATTRIBUTES

DR potential programs	ELCC (%)	Customer Class	Availability
Battery Energy Storage DLC	63%	Residential, C&I	Year-Round
Behavioral	63%	Residential	Year-Round
Domestic Hot Water Heater DLC	63%	Residential	Year-Round
EV Direct Charge Management	63%	Residential	Year-Round
EV-TOD	63%	Residential	Year-Round
Grid Interactive Water Heater	63%	Residential	Year-Round
Peak Saver Extension	63%	C&I > 150kW	Year-Round
Power Saver Extension	63%	Residential, C&I < 150kW	Summer
TOD	63%	Residential, C&I	Year-Round

Virtual Power Plant Consideration

Stakeholder Input: Virtual Power Plant

During the facilitated stakeholder meetings, several stakeholders expressed interest in evaluating scenarios that maximize the deployment of Virtual Power Plants (VPP) with the high penetration of DERs. Requested scenarios included high levels of BTM solar adoption, high participation in TOU rate, greater enrollment of light-duty EVs on either EV-TOD rates or managed charging programs, expanded participation in Peak Saver, Power Saver, and water heater demand response programs, and increased adoption of behind-the-meter battery storage.

In response to these requests, PNM developed and analyzed a suite of scenarios with elevated DER penetration levels to assess their impact on resource needs, costs, and portfolio outcomes. The detailed modeling of these scenarios is discussed in Section 7.2.3, and the results are provided in Section 9.7.

A VPP is a coordinated network of distributed energy resources that can be monitored and controlled to operate as a single flexible resource. VPPs can aggregate utility-owned solar and storage assets, as well as customer-owned resources such as BTM solar, BTM battery, electric

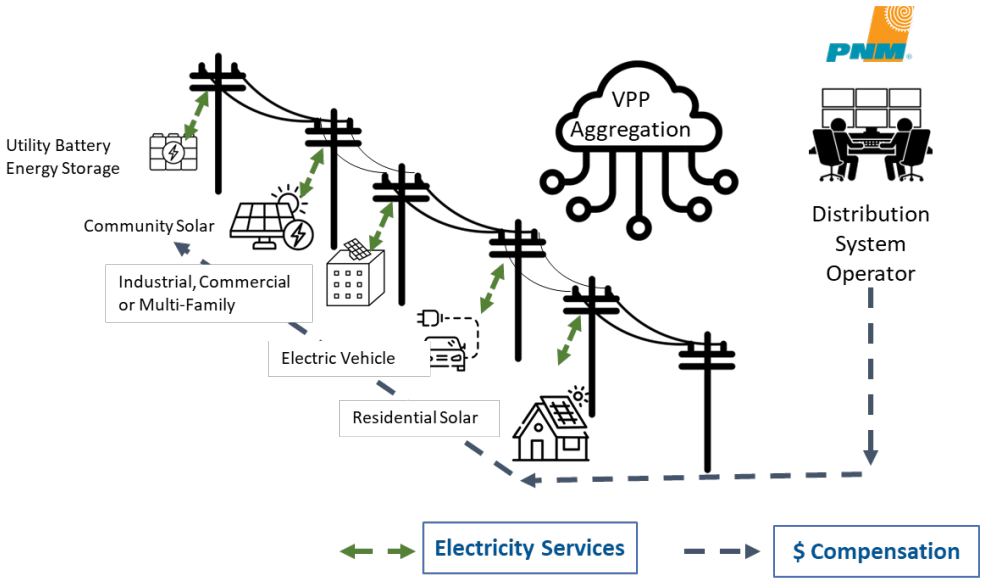
vehicle chargers, smart thermostats, and other connected devices. Through advanced communication and control technologies, a VPP can provide capacity, energy, and grid support services, helping improve reliability, reduce peak demand, and defer or avoid investments in traditional generation and distribution infrastructure.

PNM applied for a DOE grant in 2024 for a VPP Enablement project under the DOE's Grid Resilience and Innovative Partnership program, Topic Area 2 (Smart Grid Grants). As proposed, the project sought $35.6 million in DOE funding, allocated across several scope categories, including VPP software solution development, behind-the-meter device installation and deployment, system integration services, and demand response aggregator services.

The project is also expected to evaluate front-of-meter battery deployments as a solution which could provide an additional tool for addressing feeder or substation-level constraints in locations where a traditional utility owned distribution BESS installation may not be sited economically or where site availability is limited. Front-of-meter battery systems of this type are sited on the distribution feeder and configured on the utility side of the customer's meter, allowing PNM to dispatch them directly as a grid asset rather than as a customer controlled behind-the-meter resource. In addition to providing dispatchable capacity that can support overloaded feeders or substations at the system level, these systems can also be configured to disconnect the residence from the distribution system during an outage and continue supplying that residence from the battery, providing the customer with a degree of uninterrupted power during utility outages.

PNM and the DOE have not yet completed contract negotiations, and PNM does not have a definitive executed award at this time of finalization of this IRP report. PNM anticipates that the final project scope will differ from the original proposal as negotiations continue, in part because certain activities originally contemplated as cost-share have progressed during the award delay and because system needs have continued to evolve, including identification of feeders or substations that may now be better candidates for project deployment. PNM cannot represent the project's final funding level, scope, or schedule with certainty at this time. A high-level depiction of this process is shown in Figure 8-5.

FIGURE 8-5. PNM VIRTUAL POWER PLANT



In response to stakeholder requests to evaluate scenarios that maximize the deployment of VPPs through increased adoption of DERs, PNM developed a series of stakeholder scenarios. The primary modifications included:

- Increase the BTM solar forecast from the Reference case to the High adoption case
- Apply a TOU rate sensitivity with an assumed 80% customer participation rate
- Force in the Power Saver Extension and water heater demand response programs by increasing their estimated potential by 25%
- Enhance the BTM battery forecast by assuming a 50% attachment rate of 4-hour battery storage to new BTM solar installations, with a 90% program enrollment rate and 60 dispatch events per year, and an additional 1% annual battery adoption rate for existing BTM solar customers beginning in 2030

PNM analyzed the impacts of these assumptions on the resource portfolio, and the detailed results of these scenarios are presented in Section 9.7.

8.2 New Renewable Resources

New Mexico's renewable resource potential is rich and, unlike many states, offers both high-quality solar and wind resources. The location in the southwestern United States provides some of the highest-quality solar resources in the country across the much of the state, while the eastern portion of the state contains high-quality wind resources. Proximity to these renewable resources has been a key factor in the transition toward a carbon-free portfolio. The abundance of low-cost renewable resources has enabled PNM to replace retiring fossil generation with carbon-free energy while supporting reliability objectives. Looking forward, these resource advantages position New Mexico to continue supporting the state's clean energy goals while providing opportunities for further renewable generation development.

8.2.1 Solar

Stakeholder Input: Solar Capacity Factors

Throughout the 2026 Integrated Resource Planning cycle, stakeholders were provided multiple opportunities to review PNM's planning assumptions and offer feedback. During one of these review sessions, a stakeholder observed that the solar capacity factors assigned to new candidate resources were lower than those of existing solar resources in PNM's portfolio.

In response, PNM conducted a further evaluation of solar facility capacity factors and determined that the candidate resource assumptions were conservative. As a direct result of that feedback, PNM increased the solar capacity factors for candidate resources to better reflect the performance of existing facilities and the expected performance of new solar resources within PNM's portfolio.

Solar resources remain an attractive source of carbon-free energy considered in this IRP. New Mexico's climate is conducive to favorable conditions for solar power year-round and has some of the highest solar irradiance levels in the southwest region, especially in the southern part of the state.

Furthermore, PNM developed candidate solar resource capacity factors using historical generation profiles from existing solar facilities. Averaging output across multiple facilities resulted in an estimated capacity factor of approximately 28%. Following stakeholder feedback that the capacity factors for new solar candidate resources appeared conservative, PNM reevaluated its assumptions and selected a different set of facilities that more closely reflect the performance of newer solar projects within its portfolio. This reassessment increased the representative capacity factor for new candidate solar resources to approximately 33%.

Assumed Technology Characteristics

Key cost and performance parameters for new solar resources are shown in Table 8-6. Yearly Cost assumptions for new solar resources including capital cost, fixed O&M, and variable O&M can be found in Appendix K.

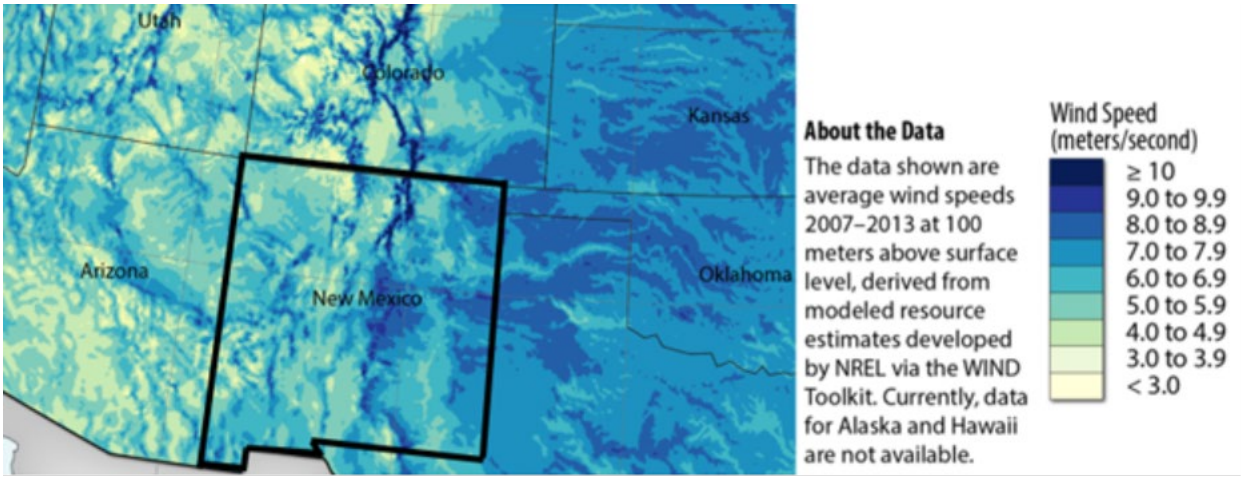
8.2.2 Wind

Stakeholder Input: Wind Operating Life

During the facilitated stakeholder process, a stakeholder observed that the operating life assumed for a generic wind resource used by PNM as a placeholder differed slightly from the operating life assumed for candidate wind resources representing potential future additions. This observation prompted PNM to conduct additional review and evaluation. Following that review, PNM refined its assumptions for the generic wind placeholder resource used prior to 2030 to more closely align with the assumptions applied to future candidate wind resources.

Over the past decade, wind generation in New Mexico has expanded considerably, growing by an average 300 MW per year since 2015. New Mexico's wind resource potential is significant and has attracted interest from buyers within and outside of the state. The highest quality wind in New Mexico is located in the eastern part of the state alongside the border of Texas where supplies are abundant or along the Southern High Plains depicted by the dark blue areas in Figure 8-6.

Figure 8-6. Average Wind Speed in the Southwest U.S.[45]



During the facilitated stakeholder process, a stakeholder identified an inconsistency between the operating life assumptions applied to the generic wind project that was included in the portfolio in 2029 and the generic wind candidate resources available for selection in later years of the study period. In response to this feedback, PNM reviewed the modeling inputs and updated the 2029 wind project to align with the assumptions applied to the generic wind candidate resources, including operating life characteristics. This update improved consistency in the representation of

[45] NLR. Wind Resource Maps and Data. Available at https://wrdb.nlr.gov/data-viewer.

wind resources across the modeling horizon and ensured that comparable assumptions were applied throughout the study period.

Assumed Technology Characteristics

The high-quality wind resources in New Mexico are generally located in the eastern portion of the state. This area has experienced significant levels of commercial development to supply high-quality wind to PNM and other off takers elsewhere in the Western Interconnection. Wind resources are modeled using a 40% capacity factor based on PNM's historical wind generation performance. Annual cost assumptions, which include capital cost and variable cost, for new wind resources can be found in Appendix K. Due to limited transmission capacity into the load center, candidate wind resources will assume new transmission will be needed. These costs are discussed in Section 8.6. Other key cost assumptions for new wind resources are shown in Table 8-6.

8.2.3 Geothermal

Stakeholder Input: Geothermal Cost & Options

During the 2026 IRP Facilitated Process, concern was raised by stakeholders regarding the capital cost PNM assumed for generic enhanced geothermal projects. Initial estimates ranged from $15,700/kW to $39,400/kW based on a three-tiered expectation of development risk. Stakeholders expressed concern that the cost PNM provided was not reflective of the current costs citing the 2025 Geothermal Drilling Cost Curves study. The costs provided by PNM characterized enhanced geothermal as an emerging technology with no utility scale commercial experience. Although small projects exist, transparency regarding the development process and cost impacts are ambiguous with no public data supporting lower capital costs. This prompted an interim IRP meeting (i.e. office hour meeting) whereby each party presented their support for the basis of capital costs. Subject matter experts from the New Mexico Geothermal Working Group, EPRI (who provided costs estimates for the 2026 IRP) and PNM along with many other interested stakeholders attended. This ensuing discussion focused heavily on new drilling techniques which represented approximately 57% of the total costs. Further discussion between PNM and EPRI regarding their estimates determined that cost adjustments could be revised to take advantage of these techniques. Therefore, the original capital cost of $15,700 /kW was reduced to $13,400/kW reflecting these advancements.

As New Mexico transitions away from fossil fuels, it is expected that new resource technologies must emerge or advancements of existing technologies need to evolve in order for PNM to further reduce CO_2 emissions and meet New Mexico's zero CO_2 emission standard beginning in 2045. Next generation geothermal or enhanced geothermal in which the combination of federal subsidies, technological improvements in drilling processes, coupled with emerging developments in engineering have fueled new advancements in geothermal technology. In 2025, New Mexico Governor Grisham announced a landmark partnership between XGS Energy and

Meta to develop 150 MW of enhanced geothermal in New Mexico. That, combined with New Mexico's untapped geothermal resource potential could position the state into expanding geothermal generation and furthering technology advancements. PNM studied two options for geothermal in this IRP: (1) binary geothermal similar to facilities already existing in PNM's portfolio, and (2) enhanced geothermal which captures future technology advancements.

- **Binary Geothermal**: By far the most common geothermal utilizes two working cycles to produce energy from an underground reservoir. The primary cycle employs a fluid to extract heat from a geothermal reservoir and the secondary cycle converts the extracted heat to produce energy via a steam turbine.
- **Enhanced Geothermal**: Deep Geothermal takes binary geothermal and advances the extraction technology. By capturing advancements in drilling techniques to reach greater depths and using proprietary, patented thermally conductive slurry material surrounding the pipes embedded within the earth, heat transfer is improved. Enhanced geothermal energy promises greater transfer capabilities and subsequently greater generation than traditional binary geothermal technology.

Assumed Technology Characteristics

Binary and enhanced geothermal cost and performance characteristics for new resource projects are summarized in Table 8-6. Capacity factors for traditional geothermal resources are based on information provided by the owners of the geothermal facility within PNM's resource portfolio. Cost assumptions for new geothermal resources, technology curves, and other characteristics can be found in Appendix K.

Subsequent internal PNM discussions recognized the importance of geothermal and extreme interests of many stakeholders. Rather than relying only on enhanced geothermal as the only candidate resource for geothermal, PNM decided to include binary geothermal in addition to the modeling database. Traditional geothermal has lower capital costs and is well positioned to compete with other technologies.

TABLE 8-6. COST AND PERFORMANCE CHARACTERISTICS FOR ALL RENEWABLE SUPPLY-SIDE CANDIDATE RESOURCES

Resource	(2026$)	Performance Characteristics					
	Capital Cost	Fixed O&M	Variable O&M	Heat Rate	Investment Tax Credit	Operating Life	Modeled Capacity
	$/kW	$/kW-yr	$/MWh	Btu/kWh	Yes/No	Years	MW
Solar - Photovoltaic	1,477	15	N/A	N/A	No	30	10
Wind	2,306	47	N/A	N/A	No	25	151
Geothermal	7,959	185	1	N/A	No	30	30
Enhanced Geothermal	13,407	184	1	N/A	No	30	30

8.3 New Energy Storage Resources

Stakeholder Input: Storage Forced Outage Rates

During a review session, a stakeholder observed that the forced outage rates assumed for the candidate 4-hour and 8-hour lithium-ion battery resources differed from those assumed for PNM's existing battery storage facilities. This observation led PNM to conduct additional review and analysis. The original forced outage rate assumptions were obtained from EPRI TagWeb, a reliable industry source. However, after further evaluation and to better align the assumptions with PNM's SERVM analyses and the expected performance characteristics of lithium-ion battery technologies, PNM agreed and concluded that the forced outage rates for lithium-ion storage resources should be more consistent across similar technologies. Consequently, PNM revised the forced outage rate assumptions for the candidate battery storage resources, increasing them to more closely align with the assumptions used for PNM's existing and planned battery storage facilities.

8.3.1 Short-Duration Energy Storage

Lithium-Ion Battery

Among the various forms of chemical storage, lithium-ion battery storage is the most competitive technology for short-duration applications (typically applications of up to eight hours) with multiple installations on PNM's systems to date. Because there is no leading competitor in short duration storage, lithium-ion battery technology remains the best commercially available resource to meet PNM's dynamic balancing requirements. Under the IRA, energy storage developers can claim an ITC through 2033, with the credit phasing down through 2035 and expiring in 2036. Projects can receive a base rate adjustment which can raise the ITC to a full 30% if they can meet the Prevailing Wage and Apprenticeships requirements. To capture these benefits, PNM has included a full 30% ITC on all storage projects modeled until 2033, 22.5% in 2034, and 15% in 2035 effectively reducing the overnight capital costs used for modeling.

Stakeholders raised concerns regarding the assumed forced outage rates for candidate battery storage resources relative to those observed within PNM's existing generation fleet. In response, PNM reviewed both the reliability assumptions and operational representation of storage technologies within the model. PNM determined that the forced outage rates sourced from EPRI were lower than those currently observed across PNM's existing fleet. To better align candidate resource assumptions with PNM's reliability modeling framework, the forced outage rates for candidate battery storage resources were increased from 4% to 8%.

The IRP analysis models 4hr and eight-hour (8hr) lithium-ion batteries as an option to meet future capacity and flexibility needs. These storage technologies share similar operating characteristics, with the primary distinction being their storage duration and energy capacity. Cost assumptions are summarized in Table 8-7 and explained in further detail in Appendix K.

Compressed Air Energy Storage

Compressed air energy storage (CAES) is a form of long-duration storage that uses surplus electricity to compress air to high pressures for storage, usually in a subterranean geologic formation. The compressed air can later be withdrawn and, at high pressure, used to power a turbine to generate electricity. The requirement for a sizeable, enclosed volume in which to store the compressed air requires specific geological conditions, which inherently limits opportunities to develop CAES at scale; however, some potential sites have been identified in New Mexico. Numerous abandoned sites from the oil and gas industry in New Mexico offer favorable cavern sites where CAES could be potentially located. CAES has a lower round-trip efficiency than lithium-ion batteries but is more suitable for longer-duration storage. Although a small number of projects are currently operating to date, CAES has not been widely deployed globally or nationally. CAES systems qualify as energy storage under the IRA and therefore can take advantage of ITC benefits. Like other storage technologies, a 30% ITC was applied for any CAES project until 2033 which effectively reduces the overnight capital costs used for modeling, with the credit phasing down over the following two years before expiring in 2036.

A compressed air energy storage facility with a 100 MW capacity and a storage duration of 10 hours. TABLE 8-7 summarizes the cost and performance characteristics for CAES. More information on costs and operating characteristics can be found in Appendix K.

8.3.2 LONG-DURATION ENERGY STORAGE

As PNM continues its transition toward a carbon-free portfolio, periods of prolonged low renewable output become increasingly important planning considerations. While wind and solar resources provide significant amounts of low-cost, carbon-free energy, historical operating experience has demonstrated that there are periods when renewable generation is reduced due to weather related factors, requiring the system to rely on dispatchable resources to meet customer demand. As more renewable resources are added to our system, the potential for multi-day periods of below-average solar and wind generation becomes an increasingly relevant reliability consideration. Long-duration energy storage technologies have the potential to help address these challenges by storing excess energy during periods of high renewable generation and discharging that energy when needed over extended durations, ranging from 24 hours to multiple consecutive days. By shifting energy across longer time horizons, long-duration energy storage resources may help support reliability and improve utilization of carbon-free generation during periods of reduced renewable output.

PNM evaluated two energy storage technologies capable of storing and discharging electricity for 24 hours or longer. One of these technologies was pumped hydro storage (PHS). Which is the oldest, most commercially mature, and most widely deployed utility-scale electricity storage technology in the world. The second technology evaluated was iron-air energy storage. This emerging long-duration energy storage technology can provide up to 100 hours of storage. While both technologies were evaluated as candidate resources, and are further discussed below, iron-air energy storage was selected in numerous modeled sensitivities, suggesting that multi-day storage may provide value under a range of future system conditions.

Pumped Hydro Storage

Pumped Hydro storage is a form of gravitational storage that uses hydraulic pumps to move water from a reservoir at lower elevation to one at higher elevation; water stored at the higher elevation can eventually be run through hydraulic turbines to generate electricity when needed. Pumped storage is a mature technology that has been widely deployed.

Several factors currently present barriers to widespread deployment of pumped storage. First, there are a limited number of sites that are suitable for pumped storage development from both a hydrological and permitting perspective. Its deployment is constrained by site-specific requirements, including sufficient elevation differences between reservoirs, suitable geology for dams, reservoirs, tunnels, adequate water resources, and sufficient land area. Second, potential projects are generally very large (sometimes described as “lumpy” investments), which makes it difficult for a single off taker to finance the plant. Third, the timelines for permitting and development of new pumped storage resources are typically longer than many other types of resources and therefore require advanced planning and commitment. These characteristics must also align with existing transmission infrastructure to help minimize costs to customers.

Despite development challenges, pumped storage is a proven mature option for longer duration storage whose long storage can provide both dependable capacity for resource adequacy and flexibility to balance renewable variability. In this IRP, pumped storage is included in all scenarios as a candidate resource to help inform PNM’s strategy regarding planning for long lead time investments.

This IRP assumes a minimum project size of 100 MW and a 24-hour storage capability, reflecting the technology’s lack of modularity and the likely necessity that PNM take on a large share of a project to effectuate development. Given the relatively long lead time for new pumped storage development due to permitting, development, and potential coordination of joint ownership agreements, the IRP does not consider new pumped storage as an option prior to 2034. Similar to battery storage systems, federal tax incentives for pumped storage systems are largely dependent upon the IRA which can range anywhere from 6% to 30% for total qualified capital and construction costs for projects, which effectively reduces the overnight capital costs used for modeling. Beginning in 2034, the ITC ratchets down over a period of two years.

The costs and characteristics of pumped storage facilities are highly site-specific and can vary considerably. The cost and operational assumptions for the representative plant modeled in this IRP can be found in Appendix K. TABLE 8-7 summarizes the key resource cost and characteristics assumed for pumped hydro.

Iron-Air Energy Storage

Iron-air energy storage is an emerging long-duration energy storage technology that utilizes the reversible oxidation of iron, commonly known as rusting, to store and release energy. During charging, surplus electricity is used to convert iron oxide (rust) back into iron. During discharge, the iron reacts with oxygen from the surrounding air, converting back to iron oxide and releasing stored energy as electricity. Iron-air batteries typically have lower round-trip efficiencies than lithium-ion battery systems, generally below 50%, and may have slower response characteristics.

However, the technology has the potential to provide multi-day energy storage, with some designs targeting discharge durations exceeding 100 hours.

Although iron-air storage remains in the early stages of commercial deployment, several utility-scale projects are currently under development or construction in the United States, representing some of the first large-scale applications of the technology. Iron-air systems are modular and utilize abundant, low-cost materials such as iron, while employing a water-based, non-flammable electrolyte. As a result, the technology has the potential to provide a lower-cost, multi-day storage solution while offering potential safety advantages compared to some conventional battery technologies. Similar to other qualifying energy storage technologies, iron-air projects qualify for federal tax incentives, which can reduce the effective capital cost assumptions used in resource planning analyses.

Iron-air storage is the longest-duration storage option considered at a duration of 100 hours. This resource is included in the analysis beginning in 2029. Assumptions used to model this technology are summarized in Table 8-7. More information on present and future cost curves can be found in Appendix K.

TABLE 8-7. COST AND PERFORMANCE CHARACTERISTICS FOR ALL ENERGY STORAGE SUPPLY-SIDE CANDIDATE RESOURCES

Resource	2026$	Performance Characteristics					
	Capital Cost	Fixed O&M	Variable O&M	Heat Rate	Investment Tax Credit	Operating Life	Modeled Capacity
	$/kW	$/kW-yr	$/MWh	Btu/kWh	Yes/No	Years	MW
Battery Storage (4 hr.)	1,661	13	N/A	N/A	Yes	20	10
Battery Storage (8 hr.)	2,386	85	N/A	N/A	Yes	20	10
CAES	4,056	29	8	N/A	Yes	40	100
Iron Air Energy Storage	3,993	20	N/A	N/A	Yes	30	100
Pumped Hydro	3,331	31	N/A	N/A	Yes	50	100

8.4 New Thermal Resources

Thermal resources are generating resources that produce electricity by using some form of heat, typically created through combustion of fuel to power a turbine. The options for thermal resources considered in this IRP represent potential innovative solutions that may contribute to PNM's transition to a carbon-free portfolio. These include both investments in new technologies and retrofits of existing fossil-fueled resources to reduce or eliminate their emissions.

8.4.1 HYDROGEN-READY COMBUSTION TURBINES

A promising pathway based on technology that exists today is the conversion of natural gas-fired generators to burn carbon-free fuel, such as hydrogen produced through emissions-free resources, to provide peaking capacity. This IRP evaluates the option of building new hydrogen-ready combustion turbines to meet future resources needs, assuming the plants will initially operate using natural gas fuel but will be converted to operate using hydrogen by 2045. Only

natural gas technologies that may be converted to burn 100% hydrogen fuel in the future are considered to increase likelihood that these investments can remain in use beyond 2045. This option builds upon the assumption that hydrogen could be purchased as a commodity by 2045, similar to how PNM purchases natural gas to fuel its natural gas generators today.

Combustion of hydrogen to produce electricity presents some engineering challenges in comparison with the operation of natural gas power plants. Namely, hydrogen's lower volumetric energy content necessitates a higher flow rate, which in turn requires that plants be designed with specialized equipment and accessories. Many modern turbines are capable of operating with a blend of hydrogen and methane fuel, some as high as 90% hydrogen by volume, but will require some limited component changes to enable direct combustion of 100% hydrogen.

While the capability to burn hydrogen is a prerequisite for consideration in the IRP analysis, it is worth noting that hydrogen is not the only carbon-free fuel that these types of plants could consume while transitioning toward a carbon-free portfolio. Renewable natural gas and synthetic hydrocarbons are also potential fuel sources, and the capability of these plants to combust any of these fuels helps preserve flexibility in any plan that includes combustion turbines as new resources.

Combustion Turbine (Aeroderivative)

The LM6000 is an aeroderivative combustion turbine derived from aircraft engine technology and adapted for electric power generation. It generates electricity by compressing air, combusting fuel, and using the resulting hot, expanding gases to spin turbine blades connected to a generator. The LM6000 can operate on a variety of fuels, including natural gas and diesel, and has been developed for operation with hydrogen blends. Due to its fast-start capability, the unit can reach full output in approximately 10 minutes, making it well-suited to provide contingency reserves and support grid reliability during unexpected events such as the loss of a generating unit or a transmission line outage.

PNM used EPRI as the source for the unit characteristics and adjusted the data for 4,500 feet above sea level. The cost and performance characteristics for an LM6000 turbine are summarized in Table 8-8. If selected prior to 2045, new aeroderivative turbines operate using natural gas and are assumed to convert to hydrogen in 2045 (incurring a one-time capital upgrade cost to address the engineering challenges described above) and not amortized over the life of the equipment. This assumption effectively penalizes any aeroderivative technology during the planning period to prevent any possibility of creating a stranded asset. Information on future cost curves can be found in Appendix K.

Combustion Turbine (Heavy Frame)

Simple cycle heavy-frame gas turbines provide reliable, dispatchable generation when renewable resources such as wind and solar are not available or are insufficient to meet customer demand. This turbine operates by drawing air into a compressor, where the air is pressurized before being mixed with fuel and burned in a combustor. The resulting hot gases expand through the turbine, causing the turbine shaft to rotate. This rotating shaft drives a generator, which converts the mechanical energy into electricity. This technology can also provide reliability services, including voltage support and spinning reserve capability, to help maintain system reliability.

The cost and performance assumptions for a heavy frame turbine are summarized in Table 8-8. PNM used EPRI as the source of the unit characteristics and adjusted the data for 4,500 feet above sea level. If selected prior to 2045, new heavy frame turbines operate using natural gas and are assumed to convert to hydrogen in 2045 (incurring a one-time capital upgrade cost) and not amortized over the life of the equipment. This assumption effectively penalizes any heavy frame technology during the planning period to prevent any possibility of creating a stranded asset. Information pertaining to the future cost curves for this technology can be found in Appendix K.

8.4.2 Combined Cycle

With average operating heat rates lower than those of traditional simple-cycle combustion turbines, combined-cycle facilities can generate electricity more efficiently than conventional heavy-frame gas turbine plants operating in simple-cycle mode. Compared to gas-fired peaking resources, combined-cycle plants generally require higher upfront capital investment but have lower operational costs per megawatt-hour of electricity produced. These facilities typically operate as baseload or intermediate-load resources, providing reliable capacity and energy when renewable resources such as wind and solar are unavailable or insufficient to meet system demand. Combined-cycle facilities equipped with carbon capture and sequestration (CCS) may also provide a pathway for reducing carbon emissions while continuing to supply firm, dispatchable generation.

- **Combined Cycle (CC):** This technology captures the thermal energy contained in the exhaust of a simple-cycle heavy-frame gas turbine that would otherwise be released to the atmosphere. This recovered heat is used to produce steam in a heat recovery steam generator. The steam is then directed to a steam turbine, which generates additional electricity without requiring additional fuel combustion.
- **Combined Cycle with Carbon Capture Sequestration (CC-CCS):** This addition to a combined cycle facility allows the capturing and permanent storage of carbon dioxide emissions in underground geologic formations, this technology can substantially reduce the carbon emissions associated with electricity generation while continuing to provide firm, dispatchable power.

To minimize water usage and associated costs, PNM assumed this combined cycle gas turbine will utilize dry cooling technology, which is included in the capital cost estimates. PNM used the EPRI TAG database as the source of the unit characteristics and adjusted the TAG data for 4,500

feet above sea level. Table 8-8 summarizes the cost and performance assumptions for CC and CC-CCS. These candidate resources are considered as options in all scenarios beginning in 2031. More information on cost curves can be found in Appendix K.

8.4.3 Advanced Generator

Linear generators are a novel, firm thermal resource which offers an alternative to combustion turbines. Linear generators work by driving magnets attached to oscillators, which interact with surrounding copper coils. The constant back-and-forth motion of the magnets produces electricity. The magnets oscillate repeatedly as air and fuel are compressed in an inner chamber, pushing the magnets outward; followed by the compression of air in the outer chamber pushing the magnets back inward.

Linear generators possess multiple advantages over traditional combustion turbines: (1) they produce minimal criteria pollutants such as NOx, (2) they can switch between fuels (e.g. natural gas to hydrogen) without any significant capital expenditures or upgrades, and (3) they can be built in small, modular units to fulfill specific locational needs to mitigate need for new transmission, much like battery storage. Linear generators are currently more costly than traditional thermal generators and have only been deployed at a small scale to date.

The assumptions for the cost and performance characteristics of linear generators are summarized in Table 8-8. Present cost data and future cost curves are summarized in Appendix K. Like hydrogen-ready combustion turbines, new linear generators are assumed to operate using natural gas fuel through 2044; however, no capital upgrades are needed to do so, as the linear generator technology is already technically capable of operating using hydrogen fuel. In all scenarios, linear generators are first included as an option in 2030.

8.4.4 Nuclear

Small modular reactors are nuclear power plants designed using modular construction techniques that allow major components to be factory fabricated and transported to a project site for installation. SMRs provide carbon-free electricity generation and, unlike variable renewable resources such as solar and wind, can generate electricity around the clock. In a light-water SMR, nuclear fission generates heat that is transferred to water. Heated water produces steam, which is directed through a steam turbine connected to an electric generator to produce electricity.

Small modular reactors have the potential to support New Mexico's decarbonization goals while also enabling hydrogen production. Because SMRs can provide both electricity and steam, they may support hydrogen production through electrolysis. Studies[46] have evaluated the use of electricity and process steam from SMRs for hydrogen production, and certain high-temperature

[46] "NuScale Small Modular Reactor Integration for Hydrogen and hydrogen cogeneration via high temperature steam electrolysis." Office of Technology NuScale Power. 2025. Available at https://www.nuscalepower.com/hubfs/Website/Files/Technical%20Publications/nuscale-small-modular-reactor-integration-for-hydrogen-and-ammonia-production.pdf and https://www.osti.gov/servlets/purl/1905588h

steam electrolysis processes can utilize both electrical and thermal energy from the reactor, improving overall hydrogen production efficiency.

Assumed Technology Characteristics

Table 8-8 summarizes the cost and performance assumptions for SMR. This technology is considered as an option in all scenarios beginning in 2035. More information on annual costs and performance characteristics for this technology can be found in Appendix K.

TABLE 8-8. COST AND PERFORMANCE CHARACTERISTICS FOR ALL THERMAL SUPPLY-SIDE CANDIDATE RESOURCES

Resource	2026$	Performance Characteristics					
	Capital Cost	Fixed O&M	Variable O&M	Heat Rate	Investment Tax Credit	Operating Life	Modeled Capacity
	$/kW	$/kW-yr	$/MWh	Btu/kWh	Yes/No	Years	MW
CT (heavy frame)	1,922	14	8	10,236	No	30	179
CT (aero)	2,850	33	6	9,449	No	30	40
Combined Cycle	2,451	18	4	6,762	No	30	582
Combined Cycle with CCS	5,011	31	5	7,765	No	30	499
Linear Generator	2,996	7	7	7,582	No	30	40
SMR	6,333	107	9	10,900	No	30	146

8.5 Transmission Expansion Alternatives

As discussed in the Transmission Section (Section 5) of this report, projects were selected based upon connecting the PNM transmission system to an external market. This section describes alternative assumptions as they were modeled in the Zonal and Nodal models.

TABLE 8-9. TRANSMISSION EXPANSION ALTERNATIVES ASSUMPTIONS

Project	Schedule	Installed Cost	Zonal Modeling Assumption	Nodal Modeling Assumption
Blackwater Connection to SPP	8-10 years	~$1.5 billion	Added a 1,000 MW bidirectional transfer path between the PNM-East area and SPP using an SPP market price curve	Constructed a second Clines Corners-to-Blackwater 345 kV circuit parallel to the existing line. The SPP price curve is connected at Blackwater with a 1,000 MW interchange limit
Rio Puerco – Four Corners Connection	8-10 years	~$448 million	Increased transfer capability between the PNM North and Four Corners areas by 700 MW	Constructed a second Rio Puerco-to-Four Corners 345 kV line parallel to the existing transmission line with the same rating

Project	Schedule	Installed Cost	Zonal Modeling Assumption	Nodal Modeling Assumption
Rio Sol Connection	4-6 years	~$262 million	Added a 600 MW transfer path between PNM-North area and the Palo Verde market	Constructed a Tie into Western Spirit-Hidden Mountain line and construct a line to Pinnacle Peak Switching station (APS) with 600 MW of Transmission capacity
SunZia Connection	4-6 years	~$219 million	Added a 800 MW transfer path between PNM-East area and the Palo Verde market	Constructed a 345 kV line from Western Spirit to the SunZia project with 800 MW limit. Modeled Palo Verde Price curve at SunZia project

8.6 Accredited Capacity of New Resource Options

In addition to accrediting the existing fleet, as discussed in Section 6.3, ELCC values were developed for incremental additions of resources to inform the expansion planning process. Incremental ELCCs were calculated for wind, solar, 4hr storage, 8hr storage, pumped hydro storage, demand response, and energy efficiency resources.

As described in Appendix M, incremental ELCCs were calculated by adding resource capacity to the 2029 base case and then adding load until LOLE returned to its original level. The load required to restore the base case LOLE, determined through interpolation, represents the accredited ELCC at that capacity level. Dividing this value by the resource's nameplate capacity yields the ELCC percentage.

Solar and storage resources were evaluated at increasing penetration levels to determine both cumulative (average) and incremental (tranche) ELCC values. Solar resources were assessed independently, while storage resources were paired with solar at a 2:1 ratio. Tranche ELCC results were used to develop continuous incremental ELCC curves for solar and storage technologies. Wind resources were evaluated at discrete penetration levels, while geothermal, demand response and energy efficiency were each assessed at a single increment.

Conventional thermal resources were accredited using an ELCC methodology applied across five resource categories: combined cycle, combustion turbine, nuclear, steam coal, and steam gas. The analysis was based on a 2029 system case calibrated to the 0.1 LOLE reliability target. Additional methodology details are provided in Appendix M.

For purposes of modeling candidate resource options, marginal ELCC curves were used to determine the appropriate accredited capacity to be applied to each new resource type depending upon the penetration level. Table 8-10 shows the marginal ELCC's of each resource type used in PNM's 2026 IRP modeling efforts.

TABLE 8-10. MARGINAL ELCCS BY RESOURCE TYPE

Solar		Wind		Storage			
Incremental MW	Marginal ELCC	Incremental MW	Marginal ELCC	Incremental MW	Marginal ELCC (4-hr)	Marginal ELCC (8-hr)	Marginal ELCC (PHS)
1,800	3%	500	8%	400	42%	58%	74%
1,600	<1%	1,000	2%	800	26%	42%	61%
2,400	<1%			1,200	22%	28%	43%
3,200	<1%			1,600		26%	37%
4,000	<1%			2,000		26%	38%

Combined Cycle	Combustion Turbine	Nuclear	Geothermal	Demand Response	Energy Efficiency
Marginal ELCC					
92%	98%	94%	76%	63%	50%

As shown in the tables above, new solar, wind and short-duration storage marginal ELCCs are significantly depressed. Marginal ELCC generally declines as the penetration of a resource type increases because each incremental addition changes the system conditions under which resource adequacy risk occurs. Early installations in a utility portfolio tend to reduce the highest-risk hours most effectively, but as those hours are mitigated, remaining reliability risk shifts to periods when the same resource is less available, less correlated with need, or constrained by duration, charging opportunity, or weather conditions. For variable resources such as solar and wind, this often reflects a shift in net peak or loss-of-load risk toward hours with lower resource output. For energy-limited resources such as 4hr and 8hr storage, the decline often reflects the broadening or lengthening of reliability risk beyond the resource's discharge capability. As a result, the next MW of a resource provides less incremental dependable capacity than prior MWs, even though the resource fleet may continue to provide meaningful aggregate reliability value.

8.7 Zonal Transmission Cost Adder for New Resources

The table below summarizes the MW threshold below which no transmission upgrade is required, and the transmission cost adder applied above that threshold, for each candidate resource type.

TABLE 8-11. TRANSMISSION UPGRADE THRESHOLDS BY RESOURCE TYPE

Resource Type	MW Threshold Without Adder	Transmission Cost Adder	Notes
PNM Scenarios			
Natural Gas, Solar, and Energy Storage	N/A	None	Flexible siting near load and fuel sources results in minimal interconnection costs.
Wind	~200 MW	$590/kW above 200 MW; up to ~1,300 MW with adder applied	Consistent MW threshold across zonal and nodal models; a $/kW adder value has not yet been documented.
Pumped Hydro Storage (PHS)	~300 MW	$640/kW above 300 MW	Driven by anticipated retirements in the Four Corners region; unlimited additional capacity permitted in the zonal model with the adder applied.
Nuclear (SMR)	Not applicable (siting uncertain)	$640/kW (unlimited capacity)	Adder applied to all SMR capacity added in the optimization due to locational uncertainty.
Stakeholder Scenarios			
Fusion	N/A	None	Assumed to site similarly to natural gas, solar, and storage; to be revisited as the technology matures.
Geothermal	0 MW	$286/kW (2026$)	Stakeholder Scenarios #2, #11, and #12.

8.8 Commodity Price Forecasts

Historically, forecasted commodity costs have played a critical role in determination of which resources are selected in the preferred portfolio and longer-term planning. In this IRP, decisions around PNM's portfolio are primarily driven by emission reduction, RPS targets, and maturity of long duration storage with commodity costs playing a smaller role as PNM has and is expected to add significant amounts of carbon free resources to its resource portfolio. Still, the cost implications of these decisions are impacted by the expected prices for natural gas, hydrogen fuel, and the wholesale electricity throughout the IRP timeframe. The comparison between these variable costs and the upfront costs of renewables and storage helps to determine the optimal resource selection to meet carbon reduction targets and also meet customer requirements.

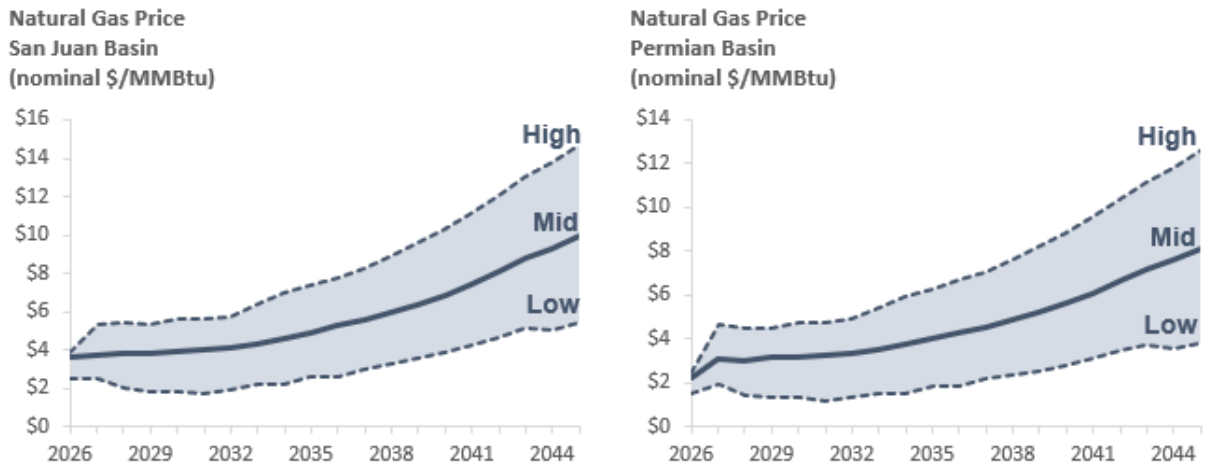
8.8.1 Natural gas Prices

PNM's natural gas supplies are sourced from two production basins: the Permian Basin in Texas and the San Juan Basin in the Four Corners region. The plants in the southern part of New Mexico are typically supplied from the Permian Basin via the El Paso Natural Gas Southern Mainline; plants in the north can also be supplied from the San Juan Basin via either New Mexico Gas Company's system or by either the El Paso natural gas northern mainline or the transwestern pipeline. Forecasts for natural gas commodity prices in each of these supply basins were developed by Siemens using fundamentals-based analysis of continental supply and demand for natural gas as well as forward prices up to October 2025.

Under the low natural gas pricing curve, negative pricing was forecasted for the winter of 2026 due to high production and low demand. For this projection, negative pricing is expected to occur in the near term for a limited amount of time. To mitigate any risks this imposed on the resource planning picture, PNM adjusted the near-term forecast provided by Siemens with the natural gas forward pricing for the low gas forecast only. Thus, the low gas forecast pricing case for natural gas is based on forward pricing for the first two years and a fundamental forecast thereafter.

These forecasts are shown in Figure 8-7; supporting data tables are provided in Appendix I.

Figure 8-7. Natural Gas Basin Prices



In addition to the commodity cost of natural gas, PNM pays additional fees and taxes to deliver natural gas from the supply basins to the burner tip of PNM's generators. These fees and taxes include fuel surcharges, pipeline usage and transportation charges, and local gross receipts taxes. While these specific costs vary by plant based on its location and the pipeline transporting the fuel, they generally add between $0.82 to $2.06/MMBtu in additional costs over the planning horizon to deliver natural gas to generators.

8.8.2 Hydrogen Prices

One of the potential options to meet a portion of future planning reserve needs in a carbon emission-free portfolio is to repurpose natural gas generation infrastructure to operate using a

"drop-in" carbon-free fuel. Since the passage of the IRA, commercial interest in hydrogen as an energy carrier has grown considerably. The US Clean Hydrogen Production Tax Credit (Title 26 § 45V) for hydrogen production is expected to stimulate a nascent industry, and DOE recently announced $7 billion in grant awards to seven proposed hydrogen hubs around the country. As the industry begins to gain momentum, the prospect that some form of carbon-free fuel, hydrogen, renewable natural gas, or other synthetic fuels, may be available by 2040 is increasingly promising.

These fuels are appealing for numerous reasons: first, they would allow for future operations of some existing natural gas generation infrastructure beyond the 2044-time frame, and second, they would provide an option for a firm, carbon-free resource, a crucial cornerstone of a reliable carbon-free portfolio. Present expectations suggest that these fuels would likely be costly to produce, deliver, and store; nonetheless, PNM would expect to use them infrequently and in small quantities much like peaking plants today.

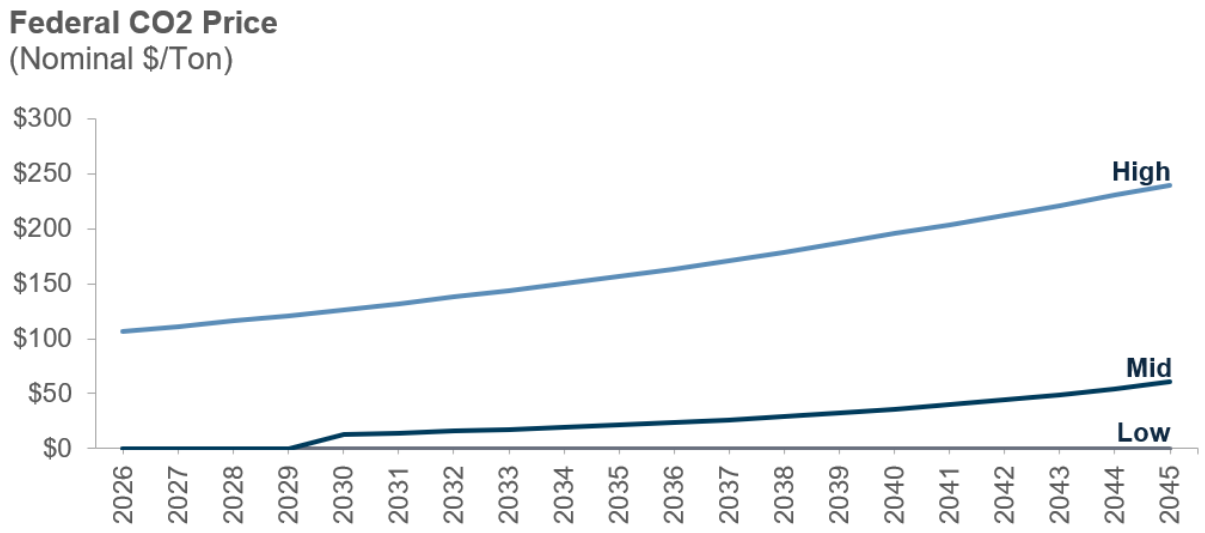
While these types of options would provide significant value to PNM's customers in the context of its 100% goal, the price at which these fuels may be offered in the future is a significant uncertainty. While many of the technologies needed to create these fuels exist today, the supply chains to produce and deliver these fuels at scale do not. Whether and at what scale these types of fuels are available will have particularly significant ramifications upon the nature of the challenges as PNM's portfolio approaches 100% carbon emission-free energy. This IRP assumes a hydrogen fuel cost based on EPRI provided data in 2045 of $21.36/MMBtu, a price intended to reflect the all-in cost of production of hydrogen including the electrolyzer, renewable energy to operate the production facility and pipeline infrastructure expenses for delivery of hydrogen within a 50-mile radius. Capital expenditures for the electrolyzer are amortized over one year and the price of hydrogen fuel does not include any federal tax incentives or credits.

8.8.3 Carbon Prices

This IRP analysis considers three forecasts of future carbon pricing derived from scenarios originally developed by Siemens. The lowest carbon price projection assumes no state or federal carbon pricing regimes throughout the planning period. For the CTP future, carbon pricing assumes no carbon tax which is reflective of the current federal policies. For the "Base" which begins in 2030 at about $13/ton and escalates over the planning period to $61/ton; in the "High" case, carbon pricing begins in 2026 and escalates at a higher rate to reach $240/ton by 2045.

The full range of carbon pricing scenarios analyzed in the IRP is shown in Figure 8-8.

FIGURE 8-8. FEDERAL CO_2 PRICES



8.8.4 WHOLESALE ELECTRICITY MARKET PRICES

This analysis incorporates projected wholesale market prices at the Palo Verde market hub. To ascertain any benefits that could be obtained through a transmission connection to SPP, the SPP market hub was included in the transmission expansion scenario. These forecasts are also developed by Siemens using a fundamentals-based model of the Western electricity system and reflect the same future commodity price forecasts for natural gas as PNM uses in its own analysis.

The wholesale market price projections used in this analysis are shaped on an hourly basis and reflect an expectation that continued investments in solar generation throughout the Western Interconnection will increasingly result in the lowest prices in wholesale markets during the daytime hours and the highest prices during the evening hours of sundown (exhibiting the same general shape as California's eponymous duck curve). Figure 8-9 and Figure 8-10 show the evolution of these patterns over the twenty-year analysis horizon as captured in the forecast provided by Siemens, in which the effects of solar saturation on daytime prices become increasingly pronounced.

FIGURE 8-9. PALO VERDE WHOLESALE ELECTRICITY PRICE FORECAST

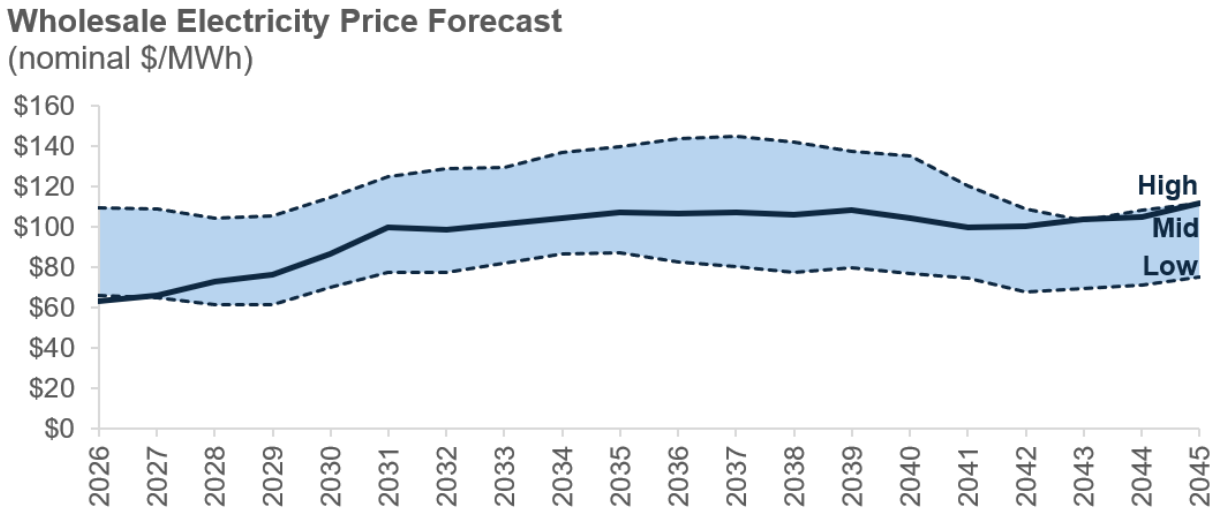
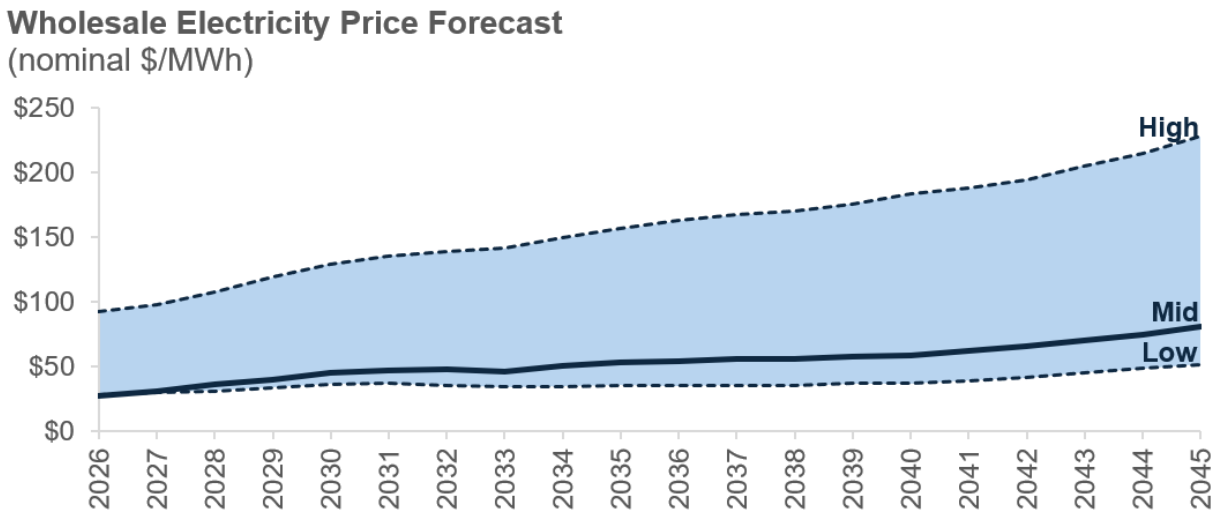


FIGURE 8-10. SOUTHWESTERN POWER POOL WHOLESALE ELECTRICITY PRICE FORECAST



8.8.5 Natural Gas Volatility Study

Stakeholder Input: Natural Gas Volatility Study

During the 2023 IRP stakeholder process, stakeholders requested that PNM perform an evaluation of natural gas price volatility, including the potential for significant price spikes and the implications of gas price uncertainty on resource planning decisions. Stakeholders also sought additional transparency regarding how gas market volatility is reflected in long-term planning assumptions and portfolio evaluations. In response, PNM committed to conducting a dedicated natural gas volatility study as part of the 2026 IRP process.

As part of PNM's ongoing efforts to improve the IRP process, many suggestions and improvements were made as part of the feedback for the 2023 IRP. These improvements serve to enhance the resulting reference portfolio by providing a robust analytical framework in which to understand all the implications of the results. One such request that was agreed to by PNM was to perform a natural gas volatility study in which the price swings for natural gas on a portfolio basis could be determined. As part of the 2026 IRP process, PNM contracted Siemens to evaluate how these factors could affect natural gas prices over the planning horizon. In February of 2026, stakeholders were provided with an overview of how the study was to be conducted and were solicited for feedback. Receiving none, the study was performed with the following framework and assumptions:

1. Analyze historical spot price data to calculate volatility, including short-duration market disruptions that create pricing anomalies;
2. Apply this volatility to the forward curve through Monte Carlo simulation;
3. Generate thousands of potential future price paths;
4. Organize these paths into standard deviation bands around the forward curve;
5. Apply the resulting price scenarios to forecast monthly natural gas consumption from the IRP dispatch model to quantify gas exposure;
6. Estimate the variance between expected and unfavorable outcomes to assess potential risk to customers;
7. Understand current utility practices regarding gas hedging;
8. Make recommendations.

To summarize, the quantitative and qualitative analyses presented in this study indicate that fuel cost variability associated with natural gas price volatility, while meaningful, can be prudently managed within the planning horizon. Simulations show that fuel cost deviations associated with natural gas price volatility remain within ranges consistent with historical market behavior, with annual variations of approximately $0.14 to $1.09/MMBtu around the forward curve. Under the high-gas-price scenarios evaluated by Siemens, this translates to an annual cost variance of

approximately $26 million to $46 million, although these impacts can be substantially reduced through PNM's existing hedging program. Basis risk was estimated to contribute an additional exposure of approximately $10.8 million. While this exposure is not insignificant, the estimate does not reflect the risk reduction benefits provided by PNM's hedging program. When viewed in the context of overall portfolio fuel costs and the broader IRP planning horizon, this level of potential variance does not represent a structural threat to long-term rate stability, provided that it remains actively managed through ongoing risk-management practices. Ultimately the data concluded that the treatment of natural gas price risk within the 2026 IRP is reasonable and consistent with sound utility planning practices. The study and its findings are found in Appendix J.

9. Portfolio Analysis

Chapter Highlights

1. PNM modeled the Current Trends and Policy future using the CTP Base Case and eleven sensitivities to evaluate how different operational, economic, regulatory, technology, rate design, EV adoption, and transmission assumptions affect portfolio outcomes.
2. PNM refined its modeling process in this IRP by first developing a location-neutral capacity expansion portfolio without transmission cost adders, then assigning selected resources to specific transmission nodes for nodal analysis. The nodal modeling step allows PNM to evaluate transmission-related impacts that the zonal model cannot capture, including system losses, resource curtailment, congested hours, and congestion costs.
3. Near-term resource additions through 2036 are primarily driven by carbon-free resources such as utility-scale solar and energy efficiency, supported by demand response and, in select cases, long-duration storage or pumped hydro for reliability
4. By 2045, CTP portfolios require substantial additions of solar, BESS, demand response, and firm dispatchable zero-carbon resources to support renewable integration and meet statutory decarbonization requirements. The projected energy mix shows a major shift away from fossil generation, with coal eliminated after FCPP retirement, carbon-free resources supplying roughly 80% of system energy in the focus period, and zero-carbon resources meeting 100% of customer energy requirements by 2045. Portfolio costs remain relatively stable across scenarios through 2040 but increase significantly between 2040 and 2045 as portfolios add higher-cost clean firm and long-duration resources needed to achieve full zero-carbon compliance.

9.1 Portfolio Analysis Overview

To comprehensively evaluate future resource needs, PNM utilizes its capacity expansion software, EnCompass™, to determine the lowest-cost combination of existing and new resources that satisfies PRM and energy requirements, while meeting RPS and carbon reduction mandates. PNM compares costs of various portfolios using a 20-year NPV over the planning horizon.

Detailed portfolio capacities and capacity expansion plans for each candidate portfolio evaluated in this IRP are provided in Appendix N: Summary Results for Each Portfolio.

9.2 Current Trends and Policy Modeling

9.2.1 PNM Cases and Modeling Approach

PNM evaluated the CTP future under varying operational, economic, and regulatory conditions, PNM analyzed twelve total scenarios under the CTP framework, comprising the CTP Base Case and eleven alternative sensitivities. These sensitivities examine the impacts of key variables, including delayed and absent technologies, different rate structures, EV adoption rates, and transmission expansion. Each sensitivity is described in Section 7.2.

Portfolios used for Nodal Analysis

Portfolios used for nodal analysis were the CTP, HEG, and LEG base cases. The four transmission sensitivities are then folded into those three futures to see how they perform.

9.2.2 Resource Additions by Specific Technology Type

Table 9-1 details the resulting capacity expansion ranges by technology type and functional resource category across all CTP simulations.

- **Focus Period (2033–2036):** Over the Focus Period, carbon-free resources, primarily new utility-scale solar and EE, are largely sufficient to reliably satisfy system needs. The modeling selects between 360 MW and 598 MW of solar alongside 196 MW of expanded EE programs. New DR programs contribute an additional 15 MW to 45 MW of dynamic peak reduction. In select scenarios, a targeted addition of long-duration storage (100 MW of either LDES or pumped hydro) is also deployed to support system reliability.
- **Planning Period (Through 2045):** Substantial resource additions are required over the remainder of the planning horizon to achieve statutory decarbonization goals. Utility-scale solar increases to between 1,144 MW and 1,409 MW, up to 130 MW of wind capacity is selected, and 420 MW of EE programs are integrated across all cases. To support higher renewable penetration, dynamic balancing requirements are met through 517 MW to 768 MW of short-duration BESS along with expanded DR. The most impactful additions are firm, dispatchable carbon-free technologies needed to satisfy New Mexico's zero-carbon mandate, with the modeling selecting between 863 MW and 1,602 MW of firm dispatchable capacity across sensitivities, utilizing diverse technology mixes depending on scenario assumptions.

Table 9-1. CTP Cases Resource Additions by Technology Type (MW Nameplate)

Technology Type	Through 2036[a]		Through 2045[a]	
	Low[b] (MW)	High[b] (MW)	Low[b] (MW)	High[b] (MW)
Solar (Utility-Scale)	360	598	1,144	1,409
Wind Generation	0	0	0	130
Energy Efficiency	196	196	420	420

Technology Type	Through 2036[a]		Through 2045[a]	
	Low[b] (MW)	High[b] (MW)	Low[b] (MW)	High[b] (MW)
Carbon-Free Energy Total	**556**	**794**	**1,565**	**1,829**
Battery Energy Storage (BESS 4hr & 8hr)	0	0	517	768
Demand Response	15	45	19	52
Dynamic Balancing Total	**15**	**45**	**536**	**820**
Long-Duration Energy Storage	0	100	0	300
Combustion Turbines (Gas/H_2)	0	0	0	179
Advanced Generator	0	0	0	280
Geothermal	0	0	0	0
Nuclear	0	0	584	1,022
Pumped Hydro	0	100	0	100
Firm Dispatchable Total	**0**	**200**	**863**	**1,602**

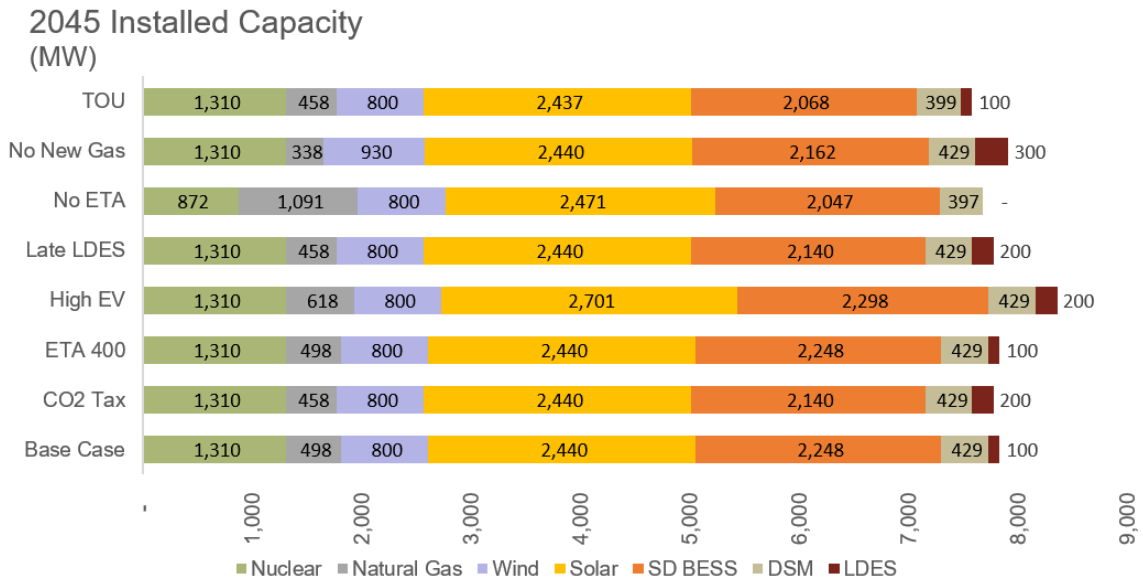
Notes:

a. Amounts through 2036 and through 2045 do not include existing, approved resources not yet in-service and pending resources not yet approved.

b. The 'Low' and 'High' columns within each individual load scenario do not represent low or high economic growth; rather, they represent the optimization bounds driven by variations in key modeling assumptions within that specific load future.

Figure 9-1 summarizes the total nameplate capacity (MW) across all CTP cases in 2045, reflecting cumulative candidate additions alongside existing and planned assets, net of scheduled unit retirements and contract expirations.

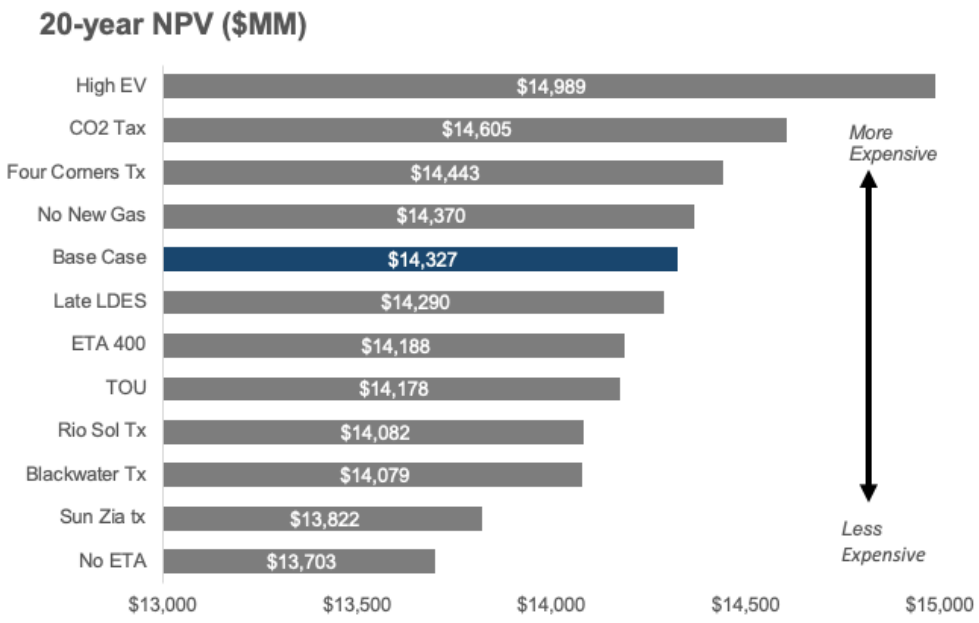
FIGURE 9-1. CTP CASES – INSTALLED CAPACITY MW (2045)



9.2.3 PORTFOLIO COSTS

As shown in Figure 9-2, 20-year NPV portfolio costs range from $13,703 million to $14,989 million across all modeled sensitivities. Excluding the High EV sensitivity (which includes incremental load to serve) and the non-ETA compliant scenario narrows this range to between $13,822 million and $14,605 million NPV. Several transmission-based sensitivities yielded lower NPVs than the CTP Base Case, driven by significant market purchase and sales opportunities that reduced overall system costs. Because these benefits depend on future electricity market price differentials which may or may not transpire, the resulting NPVs could vary materially. Therefore, these results should be evaluated in the context of evolving market conditions.

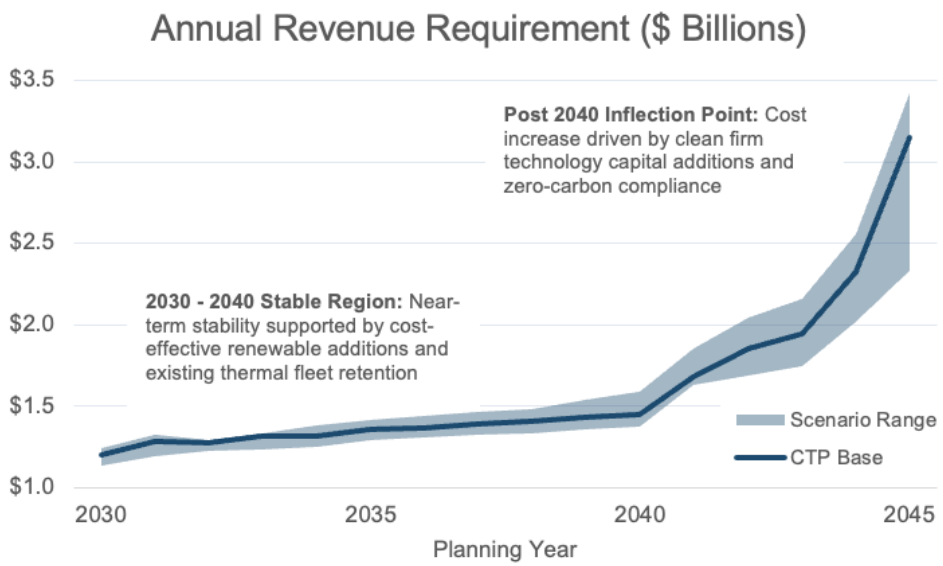
FIGURE 9-2. CTP CASES – 20 YEAR NPV



As illustrated below in Figure 9-3, annual revenue requirements remain relatively stable across scenarios through 2040. However, between 2040 and 2045, annual costs rise significantly and scenario outcomes diverge as portfolios expand to meet statutory clean energy and zero-carbon mandates.

These results reflect the widely recognized reality of electric sector decarbonization: while achieving the initial 80% to 90% clean energy threshold remains relatively stable and provides moderate increases in annual revenue requirements through 2040, eliminating the final 10% to 20% of emissions requires significant capital investment in clean firm and long-duration technologies. The post-2040 cost inflection across all policy-compliant scenarios directly illustrates this dynamic, showing that achieving full zero-carbon compliance is the primary driver of long-term portfolio costs.

FIGURE 9-3. CTP CASES – ANNUAL REVENUE REQUIREMENT (2030-2045)



9.2.4 ENERGY GENERATION MIX

While nameplate capacity measures the gross installed rating of system resources, energy generation reflects the actual volume of electricity produced to meet customer load throughout the year. Across all CTP cases, the energy trajectory reflects a structural shift towards zero-carbon generation, driven by RPS targets and ETA mandates:

- **Focus Period (2033–2036):** Following the retirement of PNM's remaining coal capacity at the FCPP (which fully eliminates coal from PNM's portfolio) carbon-free resources supply the majority of total system energy. Additionally, short-duration BESS plays a critical balancing role during this period, absorbing mid-day solar overgeneration and discharging during the evening net-peak to minimize curtailments and reduce reliance on natural gas-fired generation.
- **Remainder of Planning Period:** By 2045, 100% of customer energy requirements are met by zero-carbon resources. Emerging clean firm assets (e.g., SMRs or enhanced geothermal) serve as the zero-carbon baseload foundation, while hydrogen-fueled combustion turbines operate strictly in a targeted peaking capacity - accounting for under 1% to 3% of total annual system energy.

These energy trajectories directly mirror the financial patterns observed in the annual revenue requirements, illustrating how physical generation shifts long-term portfolio costs.

FIGURE 9-4. 2026-2045 CTP BASE CASE - PROJECTED ENERGY MIX BY TECHNOLOGY (%)

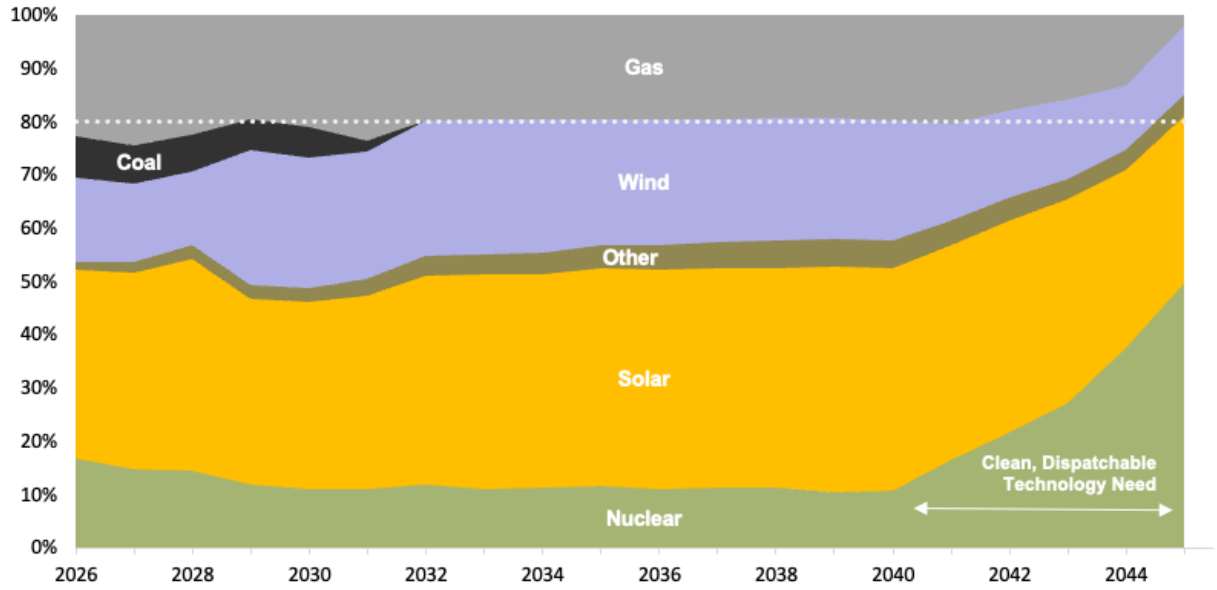


Figure 9-5 and Figure 9-6 illustrate the energy generation mix across all modeled CTP sensitivities in 2036 and 2045, respectively. As shown below, the generation mix remains largely consistent across sensitivities in 2036 due to the closely aligned expansion plans through 2040. Most of the portfolio energy production is from nuclear, solar and wind resources which are all CO_2 free. The remaining energy is produced from DSM programs such as EE and gas fired resources. Energy from gas resources is still produced at low cost, however state mandates limit full utilization throughout the year. In 2045, portfolio energy mixes remain closely aligned across almost all runs as they ramp to meet zero-carbon targets between 2040 and 2045, diverging only in the sensitivity evaluated without CO_2 mandates. By 2045, new nuclear additions provide a significant increase in CO_2 free energy to the system, to complement solar and wind production. Small amounts of energy in each sensitivity are being produced from hydrogen fired combustion turbines and EE programs.

FIGURE 9-5. 2036 PROJECTED ENERGY MIX BY TECHNOLOGY (%) BY CTP SENSITIVITY

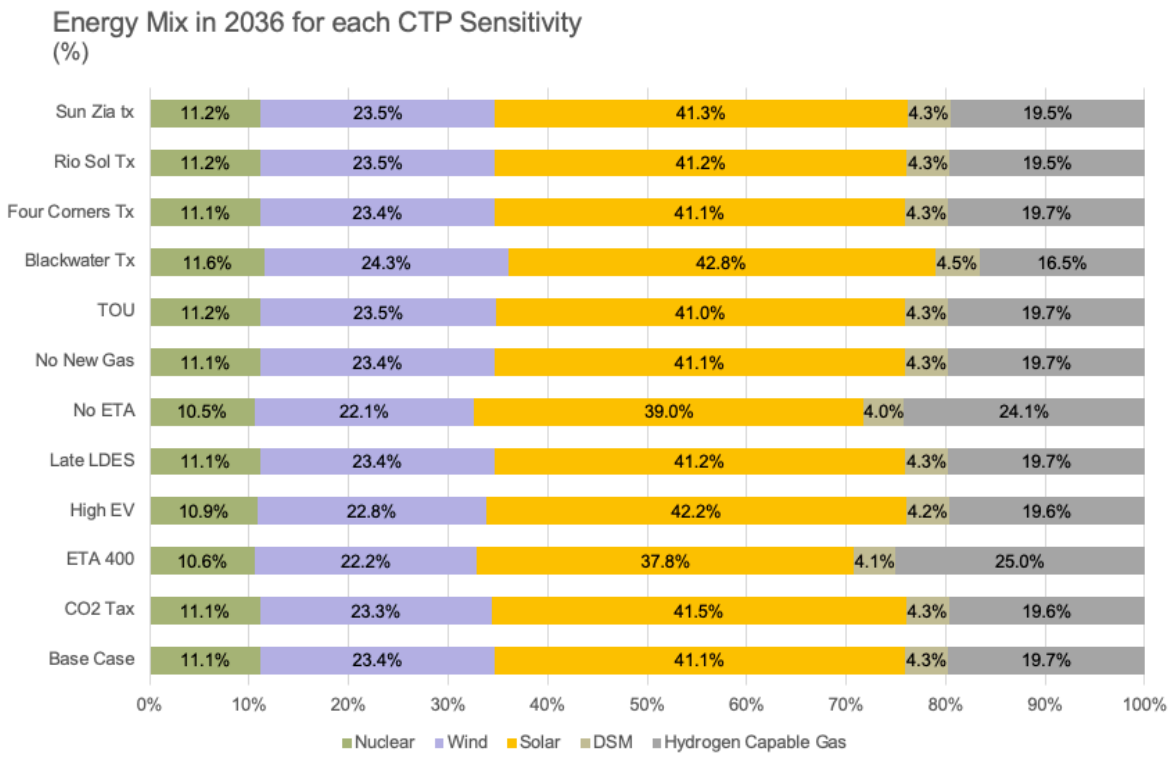
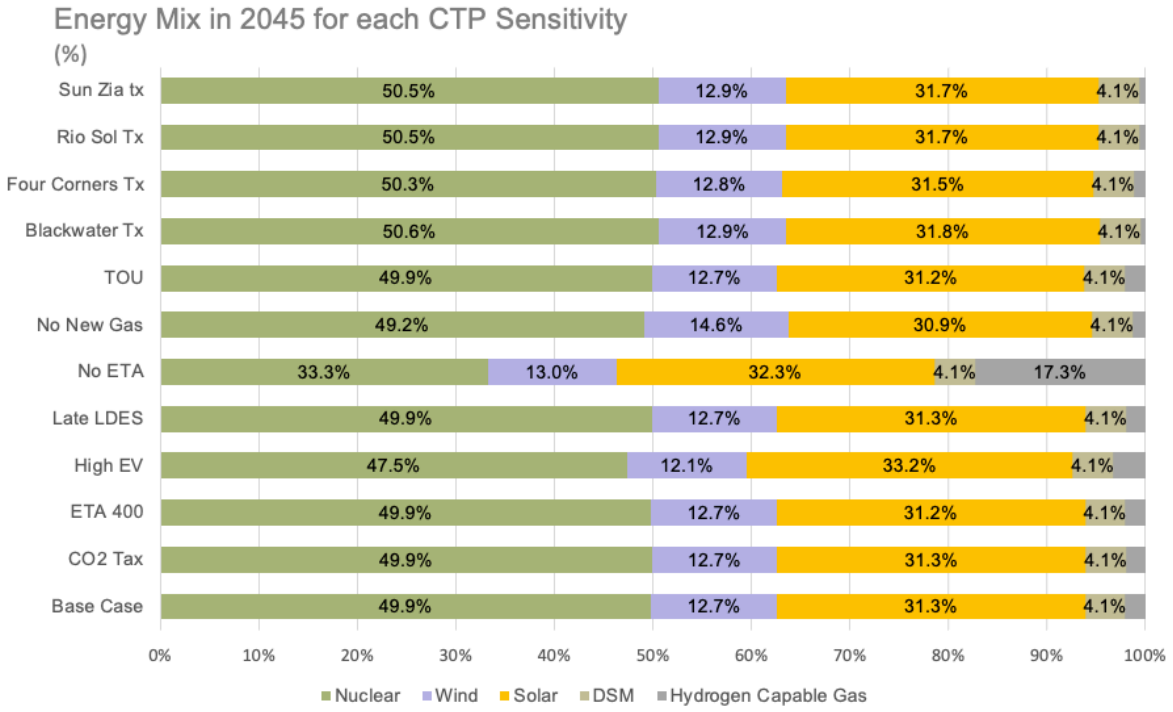


FIGURE 9-6. 2045 PROJECTED ENERGY MIX BY TECHNOLOGY (%) BY SENSITIVITY



9.2.5 Carbon Dioxide Emissions

Driven by ongoing generation fleet transitions, combining past thermal retirements, the planned exit from the FCPP by mid-2031, and substantial additions of new zero-carbon generation and storage, PNM's carbon intensity drops sharply across the planning horizon in compliance with New Mexico's ETA. Across all modeled CTP sensitivities, projected carbon emissions trajectories closely track overall energy generation patterns, maintaining strong consistency across sensitivity variations as new clean resources scale to meet statutory requirements.

CTP Base Case Carbon Trajectory and Statutory Compliance

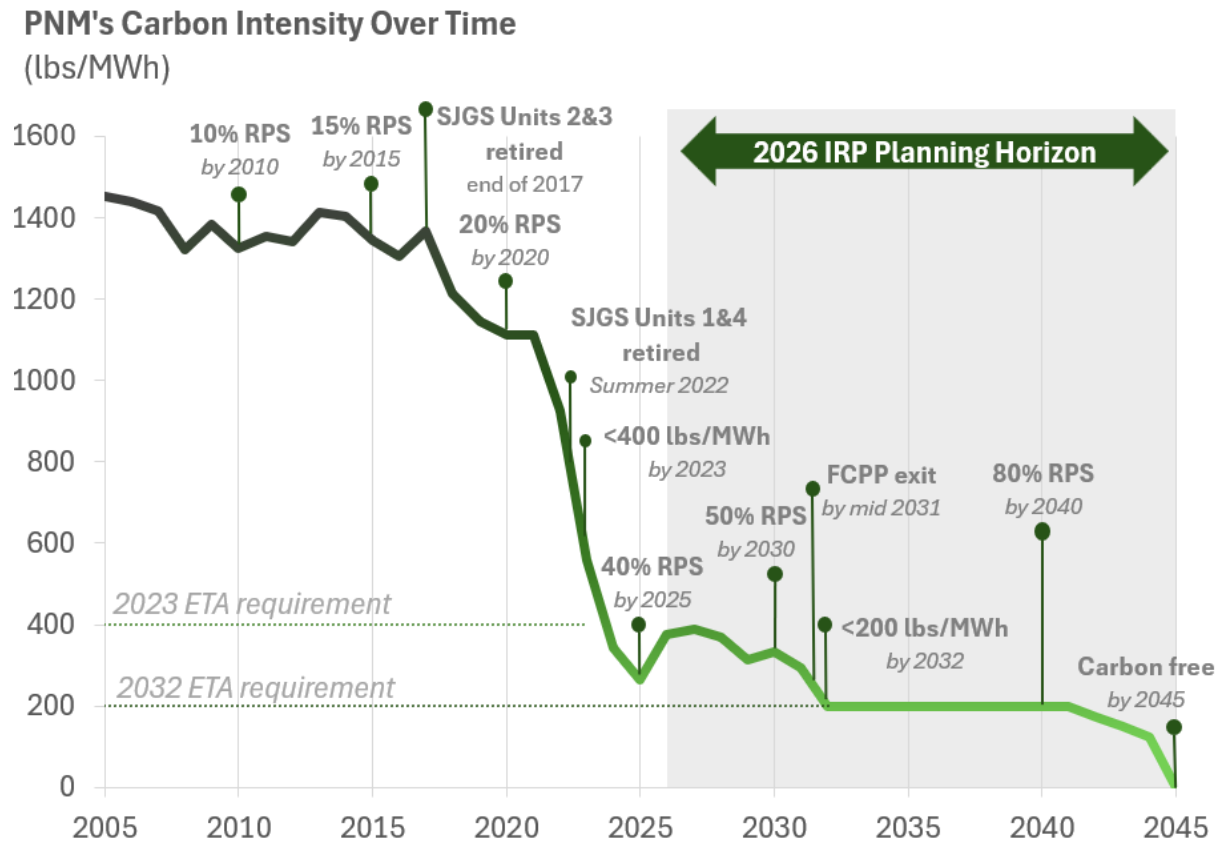
PNM's past fleet actions, including the retirement of SJGS Units 2 & 3 in 2017 and Units 1 & 4 in 2022, significantly reduced system carbon intensity, bringing emissions below the 2023 limit of 400 lbs/MWh.

Entering the 2026 IRP planning horizon, emissions fall even further:

- **Near-Term Mandates & FCPP Exit (Through 2032):** Following compliance with the 40% RPS target in 2025, PNM exits its remaining coal capacity at FCPP by mid-2031. This complete elimination of coal from the portfolio drives carbon intensity down to meet the ETA requirement of less than 200 lbs/MWh by 2032.
- **Focus Period & Interim RPS Milestones (2033–2040):** During this phase, zero-carbon assets, primarily solar, wind, nuclear, and energy storage, supply approximately 80% of total system energy, aligning with the increased RPS target by 2040. Natural gas-fired resources supply the remaining ~20% of annual generation to manage evening net-peaks and multi-day weather variability. While natural gas remains critical for firm capacity and resource adequacy, its operational capacity factor stays restricted by state emission caps, keeping total carbon intensity flat at the ~200 lbs/MWh floor through 2040.
- **Full Decarbonization (2041–2045):** Between 2040 and 2045, carbon intensity transitions from 200 lbs/MWh to zero. The integration of emerging clean firm generation (such as SMRs) replaces conventional natural gas. Hydrogen-capable combustion turbines operate strictly for peaking and reliability, contributing just 1% to 3% of annual energy generation, ensuring full compliance with the 2045 ETA carbon-free mandate.

For the CTP base case portfolio, annual carbon intensity is shown in Figure 9-7 across the 2026 IRP planning horizon in addition to PNM's historical carbon intensity.

FIGURE 9-7. CARBON INTENSITY PROGRESSION OVER TIME

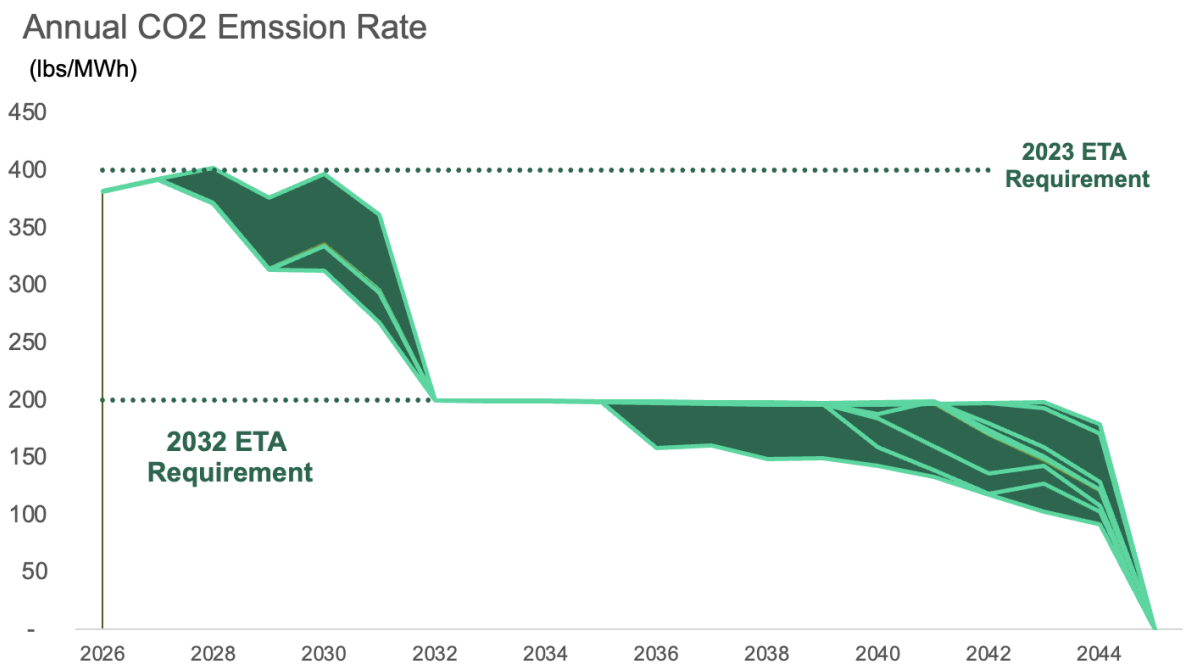


Note: Reported carbon intensity is calculated from modeling results by dividing total emissions from PNM's generation fleet by total annual energy production. Mandated carbon emission intensity compliance is measured over a defined three-year window, the first being 2023-2025. Future compliance outcomes may vary depending on variables such as load, weather, and actual system dispatch.

Cross-Portfolio Emissions Alignment

Because expansion plans across all CTP sensitivities remain closely aligned, annual CO_2 emission rates (lbs/MWh) follow a consistent downward trajectory across all portfolios, with sensitivity variations bounded within narrow bands over specific planning periods. Figure 9-8 below shows projected annual CO_2 intensity of portfolios determined for each of the CTP sensitivities. Upper and lower bounds created by a few of the CTP sensitivities are mainly driven by interaction with new markets or expanded market capability, both of which can have an impact on PNM's calculated CO_2 intensity. Regardless of sensitivity paths prior to 2045, all portfolio trajectories fully converge to zero lbs/MWh by 2045, satisfying the 100% carbon-free ETA mandate.

FIGURE 9-8. PROJECTED CARBON INTENSITY OF CTP SENSITIVITIES



9.3 Nodal CTP Analysis Results

Stakeholder Input: Provide potential expansions of transmission connectivity to other utilities and analysis

During the 2023 IRP, stakeholders requested that PNM explore potential expansions of transmission connectivity.

This section summarizes Nodal model runs over the CTP Future. All simulations use the capacity expansion plan for the CTP future assumed to be built out for the years simulated 2029, 2035 and 2040. All projects regardless of their respective in-service dates due to expected development time for the transmission alternative were assumed to be operational in 2035 and 2040.

9.3.1 Losses

Figure 9-9. Transmission Alternative Losses Based Upon the CTP Figure

Year	CTP Future Losses (GWh)				
	CTP Future No Transmission Alernative	Rio Sol Connection	Sun Zia Connection	Blackwater Connection to SPP	Rio Puerco Switching Station – Four Corners
2029	687	687	687	687	687
2035	710	697	702	844	675
2040	742	731	735	784	706

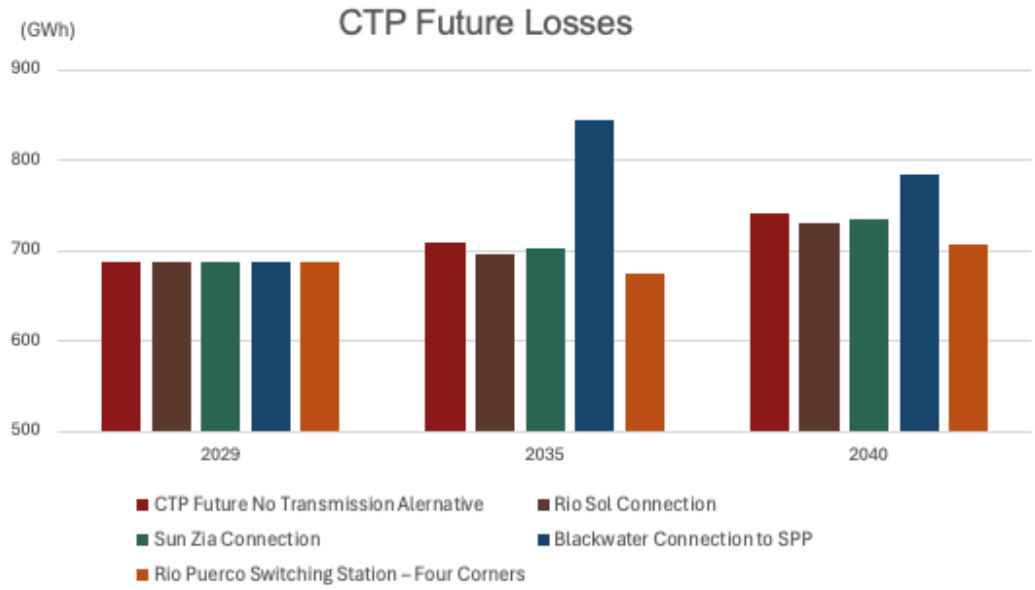


Figure 9-9 shows nodal losses for the CTP future across the four transmission scenarios examined in this analysis. Applying PNM's publicly posted 2026 loss rate of 2.78%[47] to the PNM BA's forecasted peak load in the nodal model yields an expected 681 GWh of annual losses. This confirms the model is calibrated to historical losses and reasonably represents a plausible future range for loss quantities. Based on the assumptions used, three of the four alternatives reduced losses by approximately 2.5% in 2035 and 2040. The key takeaway is that greater connectivity generally reduces losses; however, in the case of the Blackwater Connection to SPP the significant price differential drives higher flow, which in turn increases losses.

9.3.2 Resource Curtailment

Figure 9-10. Transmission Alternative Curtailments Across the CTP Future

Year	CTP Curtailments (GWh)				
	CTP Future No Transmission Alernative	Rio Sol Connection	Sun Zia Connection	Blackwater Connection to SPP	Rio Puerco Switching Station – Four Corners
2029	0	0	0	0	0
2035	28	27	8	6	27
2040	212	209	48	39	205

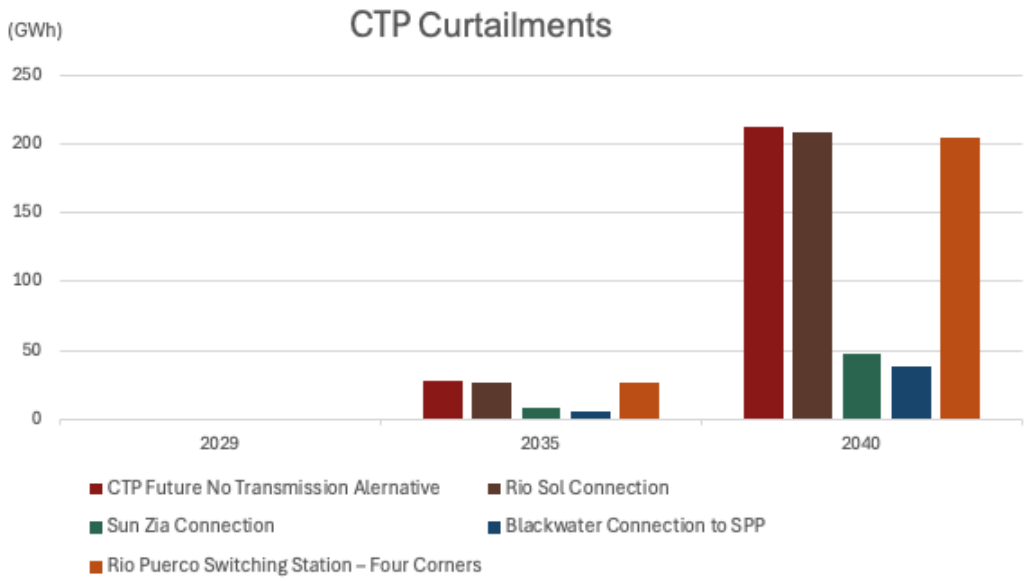


Figure 9-10 shows PNM resource curtailment over the CTP Future. In 2025, resource curtailments were in the range of 400 GWh. Because modeled curtailments fall to roughly half that 2025 level,

[47] https://www.oasis.oati.com/pnm/index.html

with additional storage resources coming online in 2026 and 2028, the model demonstrates that the portfolio can operate at substantially lower curtailment levels than today from an operational dispatch perspective. As PNM enters the EDAM, where greater efficiency becomes operationally available than exists today, this fully system-wide optimized dispatch indicates PNM could operate with fewer hours of curtailment in the future.

9.3.3 Congested hours

Figure 9-11. Transmission Alternative Path 48 Congestion Hours Across CTP Future

Year	CTP Congestion (Hours)				
	CTP Future No Transmission Alernative	Rio Sol Connection	Sun Zia Connection	Blackwater Connection to SPP	Rio Puerco Switching Station – Four Corners
2029	898	898	898	898	898
2035	943	596	2,967	1,637	170
2040	1,013	627	2,769	2,039	224

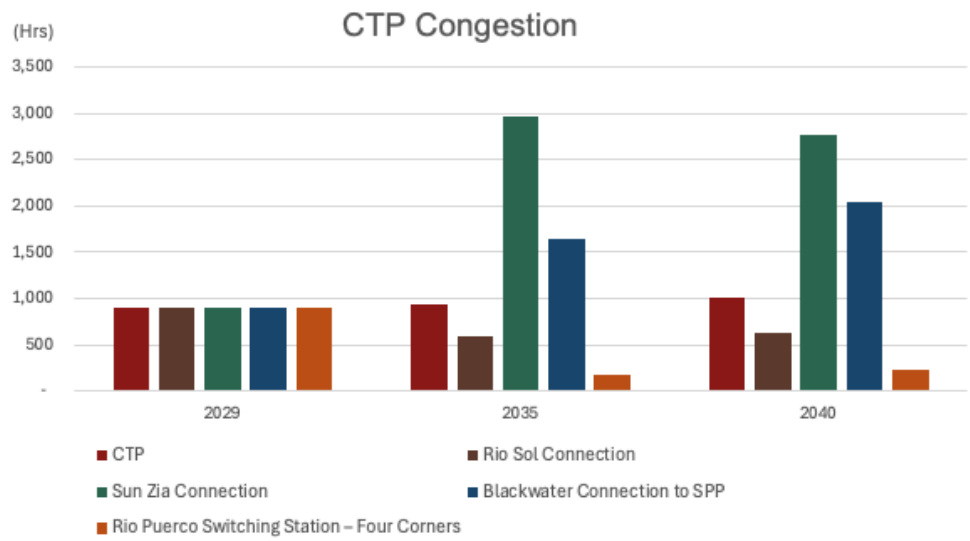
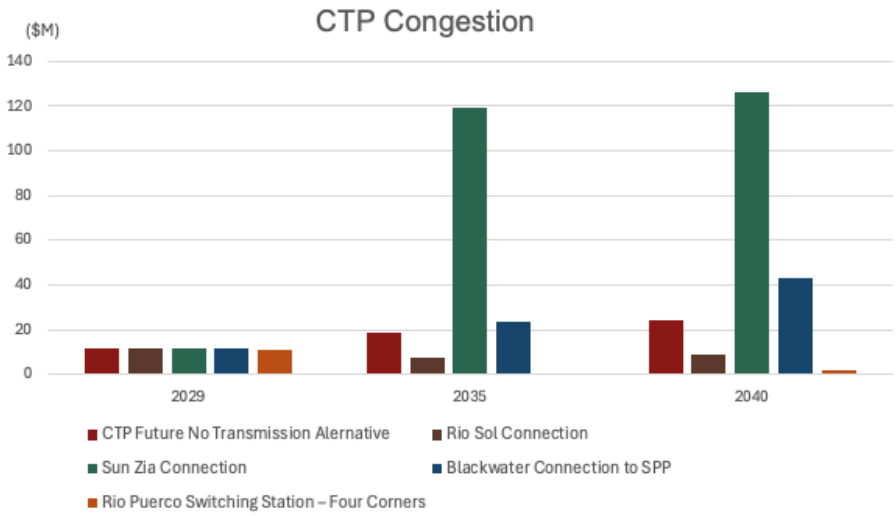


Figure 9-12 shows the congested hours from the nodal model for the years simulated. Historical congestion on the path has been minimal, typically tied to transmission outages. The model indicates that as additional resources are added in the future, some congestion is expected to occur, and future transmission expansion could keep this congestion manageable. The SunZia Connection transmission alternative drives congestion hours notably higher, tied to the difference between market price and PNM's generation dispatch cost.

9.3.4 Congestion Dollars

Figure 9-12. Transmission Alternative Congestion Dollars for Path 48 over the CTP Future

Year	CTP Congestion ($ Million)				
	CTP Future No Transmission Alernative	Rio Sol Connection	Sun Zia Connection	Blackwater Connection to SPP	Rio Puerco Switching Station – Four Corners
2029	12	12	12	12	11
2035	19	8	120	23	1
2040	24	9	126	43	2



As seen in Figure 9-12 congestion costs vary significantly across the transmission alternatives, based on differing market assumptions and portfolio dispatch. Because each alternative provides access to a different market, dispatch patterns and congestion settlement outcomes differ accordingly. Congestion dollars suggest that Four Corners and Rio Sol Connection projects reduce Congestion cost to the system over the study period.

In summary, further analysis is warranted for transmission alternatives that provide access to an external market, as both the Nodal and Zonal models show promising cost reductions. However, while these results are directionally useful in identifying which alternatives merit further study, they should not be treated as conclusive. PNM will need to consult with external market experts experienced in SPP, CAISO, and the broader Arizona wholesale market to better understand the specific dynamics of each connecting market, and to confirm whether a more detailed and rigorous accounting of those market interactions would continue to support the cost savings suggested by this preliminary transmission alternative analysis.

9.4 Most Cost-Effective Portfolio

In accordance with the IRP Rule, PNM has identified an MCEP, which PNM has anchored to the expansion plan portfolio using the base CTP future. PNM identifies the CTP as the MCEP because it minimizes the net present value of revenue requirements among the portfolios satisfying applicable reliability, risk, and state-policy requirements under the assumptions evaluated. Appendix O reproduces the complete results for this selected portfolio, which also appears in Appendix N. PNM determined the MCEP using its best estimates for load growth, behind-the-meter solar adoption, EV adoption, electrification trends, economic development, future energy prices, and technology costs. These assumptions collectively defined PNM's CTP future and formed the basis for developing the MCEP. Accordingly, PNM selected the base CTP future expansion plan as the MCEP for the 2026 IRP. This expansion primarily adds energy efficiency and solar resources to meet needs in the IRP focus period of 2033 to 2036. However, while the IRP Rule requires the utility to designate a primary MCEP, it also mandates that the IRP demonstrate how the resource plan adapts under shifting supply and demand dynamics.

Because modern utility planning involves multi-dimensional uncertainties, including evolving technology commercialization timelines, fuel price volatility, transmission expansion, and dynamic load growth trajectories, relying solely on a single static portfolio creates substantial long-term customer risk. Therefore, PNM’s modeling framework expands beyond the point-estimate MCEP to evaluate how portfolio choices adapt across a broad suite of sensitivity analyses.

Rather than treating the MCEP as a rigid, exclusive blueprint, PNM synthesizes the common analytical denominators across all three futures to establish tiered procurement ranges. These ranges capture the baseline's underlying elasticity, providing PNM and stakeholders with transparent insight into how the MCEP dynamically evolves in response to real-world market conditions. This approach maintains essential commercial flexibility, supports prudent near-term execution during the Action Plan Period, and prevents premature capital commitments to specific emerging technologies before they achieve commercial or economic maturity.

FIGURE 9-13. INSTALLED CAPACITY ADDITIONS FOR THE MOST COST-EFFECTIVE PORTFOLIO

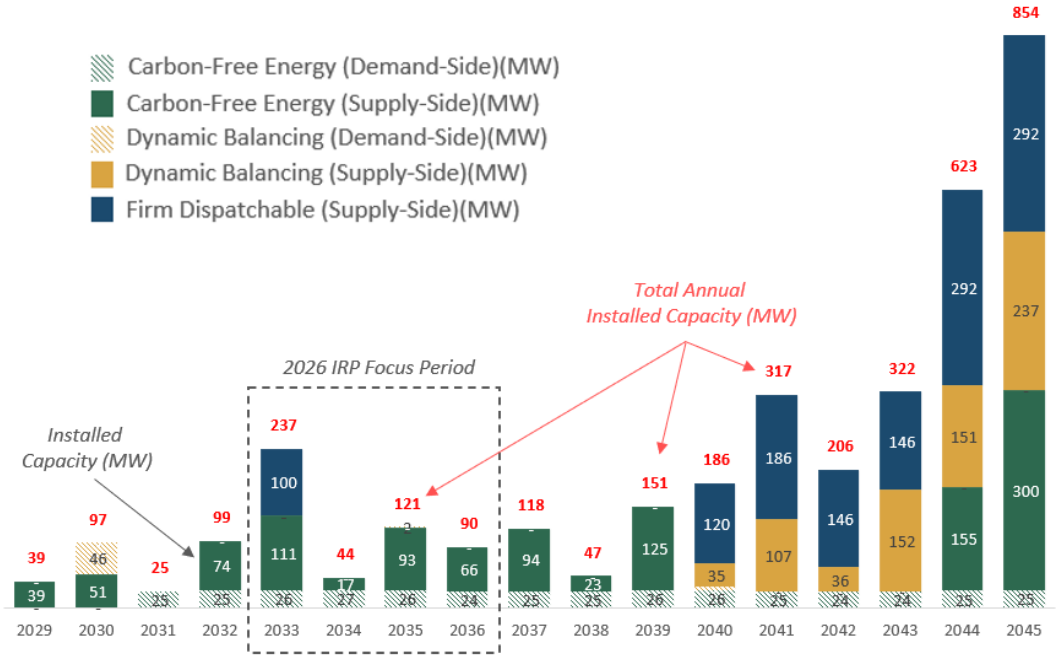


Figure 9-13 outlines the volume, timing, and functional categories of proposed new resources required to reliably serve customer demand across the 20-year planning horizon while fulfilling state statutory policies using the CTP base case. For only the MCEP, PNM has apportioned the Carbon-Free Energy and Dynamic Balancing functional categories to illustratively show that resources in these categories could be composed of a combination of demand and supply side resources. However, PNM's resource planning process is technology and connectivity agnostic to ensure PNM meets its three planning core objectives: maintaining reliability, minimizing costs and mitigating environmental impacts.

Crucially, the resource additions included in the MCEP reflect the deterministic optimization of a single case prior to stress-testing with various sensitivity analyses. Consequently, the formal Statement of Need (Section 10) integrates both the MCEP baseline and the boundary variations established by the sensitivity analyses. Expressed through procurement tiers and functional resource attributes, the Statement of Need ensures system resource adequacy, maintains PRM, and fulfills state environmental mandates under a least-cost, risk-managed framework.

Stakeholder Input: Specifically identify all resources chosen in the MCEP

Stakeholders commenting on PNM's 2023 IRP requested greater transparency regarding the resources included in the Most Cost-Effective Portfolio. In response, the specific resources that make up the MCEP are identified in Appendix O of the 2026 IRP.

9.5 Low Economic Growth Cases

To establish a low customer demand and energy requirement boundary, PNM analyzed four sensitivities under the LEG framework. This boundary future and sensitivities test system resource additions if economic conditions dampen customer demand below reference projections.

9.5.1 Resource Additions by Specific Technology Type

To test portfolio robustness against downside load risk, the LEG future assumes system requirements under reduced energy consumption and peak demand. Evaluating this trajectory establishes the minimum baseline of resource additions necessary to maintain reliability and fulfill statutory mandates if economic growth falls below reference case expectations.

- **Focus Period (2033–2036):** Over the Focus Period, existing and near-term committed solar and battery storage resources fully satisfy PNM's PRM requirement, eliminating the need for uncommitted, candidate supply-side capacity additions during this timeframe. The modeling does still add 163 MW of EE and 9 MW of DR programs.
- **Planning Period (Through 2045):** Even under suppressed demand growth, the structural retirement of legacy natural gas assets post-2035 creates a persistent capacity deficit. Consequently, a baseline addition of 146 MW to 624 MW of clean firm and dispatchable capacity is required by 2045. This core foundation is supported by between 778 MW and 894 MW of solar additions, expanding EE programs, and incremental dynamic balancing resources, including both BESS and DR, to maintain grid reliability during net peak periods.

TABLE 9-2. LEG CASE RESOURCE ADDITIONS BY TECHNOLOGY TYPE (MW NAMEPLATE)

Technology Type	Through 2036[a]		Through 2045[a]	
	Low[b] (MW)	High[b] (MW)	Low[b] (MW)	High[b] (MW)
Solar (Utility-Scale)	0	0	778	894
Wind Generation	0	0	0	0
Energy Efficiency	163	163	369	381
Carbon-Free Energy Total	**163**	**163**	**1,159**	**1,263**
Battery Energy Storage (BESS 4hr & 8hr)	0	0	268	364
Demand Response	9	9	18	20
Dynamic Balancing Total	**9**	**9**	**286**	**384**
Long-Duration Energy Storage	0	0	0	0
Combustion Turbines (Gas/H_2)	0	0	0	0
Advanced Generator	0	0	0	40
Geothermal	0	0	0	0
Nuclear	0	0	146	584
Pumped Hydro	0	0	0	0
Firm Dispatchable Total	**0**	**0**	**146**	**624**

Notes:

a. Amounts through 2036 and through 2045 do not include existing, approved resources not yet in-service and pending resources not yet approved.

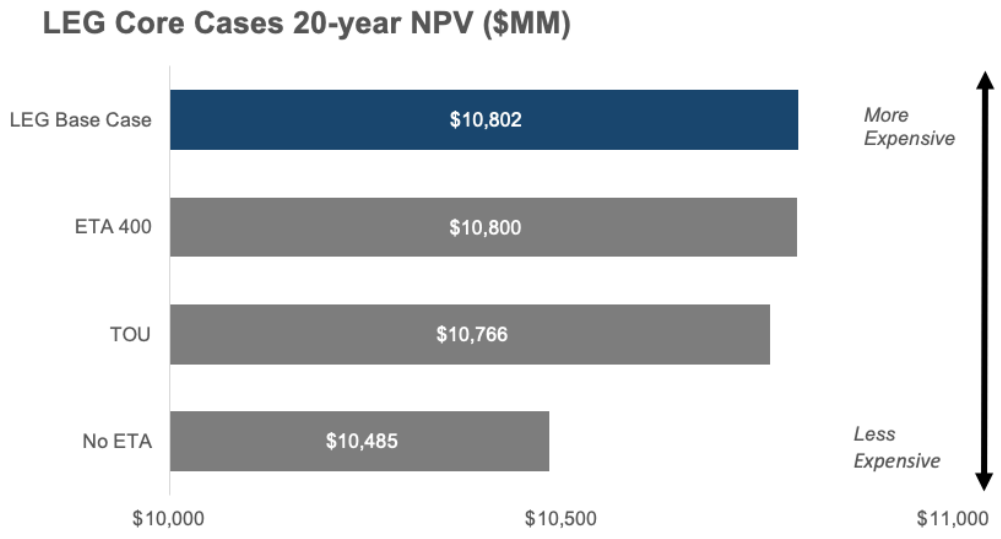
b. The 'Low' and 'High' columns within each individual load scenario do not represent low or high economic growth; rather, they represent the optimization bounds driven by variations in key modeling assumptions within that specific load future.

If PNM were to encounter such depressed customer load growth, PNM would re-evaluate the timing and scale of resource plans requested for approval at the Commission, specifically the 2029-2032 System Resources, to ensure additions remain aligned with updated customer demand forecasts. Since the LEG is a low probability future, PNM does not expect to make any adjustments to resources sought in the 2029-2032 System resources application as of the filing of this IRP.

9.5.2 LEG PORTFOLIO COSTS

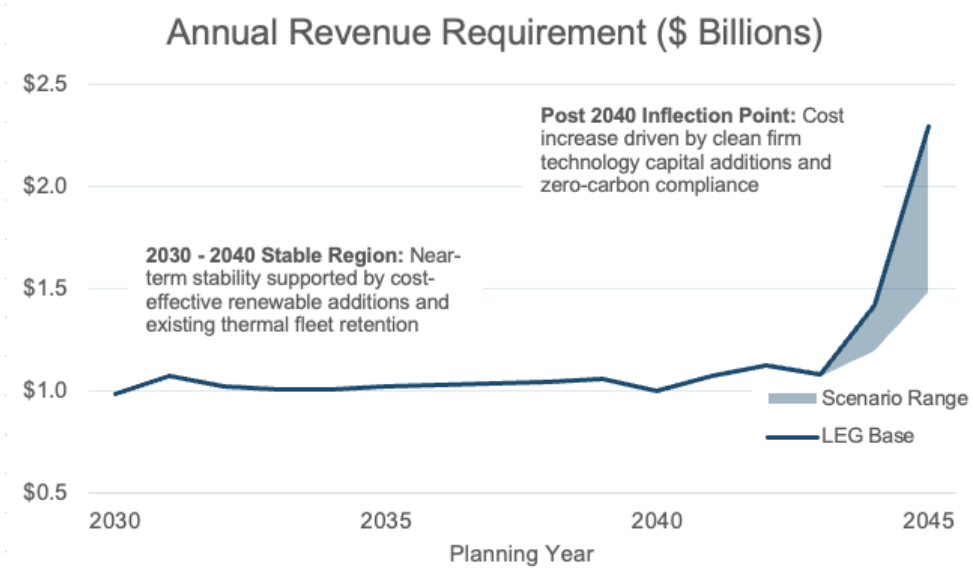
As shown in Figure 9-14, 20-year NPV portfolio costs range from $10,485 million to $10,802 million across all modeled scenarios. Excluding the non-ETA compliant scenario narrows this range to between $10,766 million and $10,802 million NPV.

FIGURE 9-14. LEG CASES – 20 YEAR NPV



Like the CTP cases shown in Figure 9-3, annual revenue requirements remain relatively stable across scenarios through the early 2040s, though this cost stability extends slightly longer than in the CTP cases due to reduced near-term load pressure. However, between 2043 and 2045, annual costs rise significantly and scenario outcomes diverge as portfolios deploy capital to meet statutory clean energy and zero-carbon mandates.

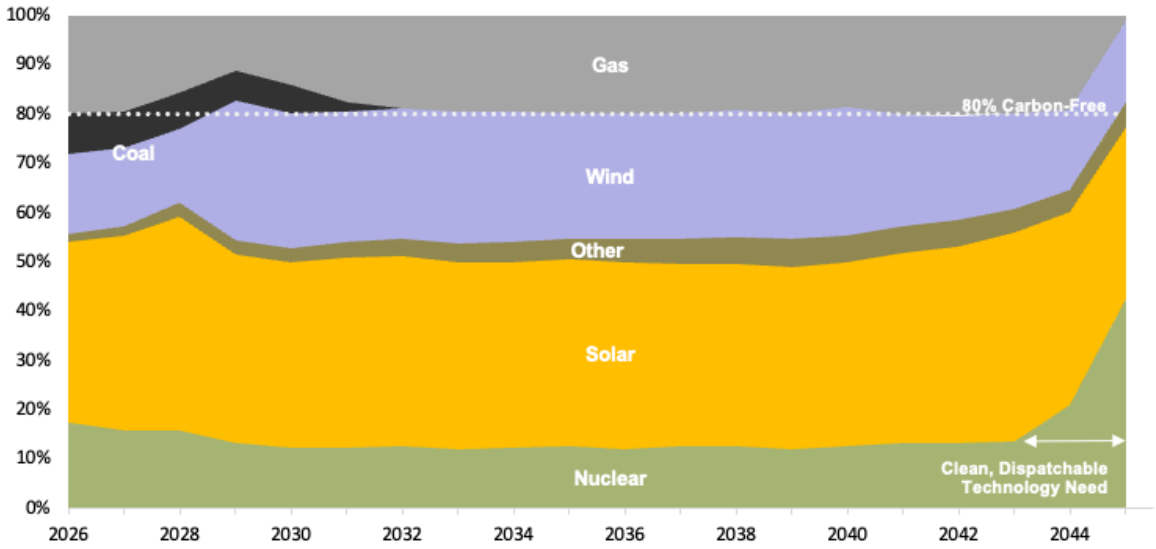
FIGURE 9-15. LEG CASES – ANNUAL REVENUE REQUIREMENT (2030-2045)



9.5.3 LEG Energy Generation Mix

As shown in Figure 9-16, lower demand provides a slight early-period advantage in the energy mix, allowing existing and planned zero-carbon resources to easily carry the system. In fact, the portfolio maintains a steady ~80% carbon-free energy share across most of the planning horizon. In alignment with the revenue requirement trends, the final push to replace the remaining ~20% gas margin is slightly delayed, concentrating the rapid ramp in clean, dispatchable technology between 2043 and 2045 to satisfy full zero-carbon mandates.

Figure 9-16. 2026-2045 LEG Base Case - Projected Energy Mix by Technology (%)



9.6 High Economic Growth Cases

The High Economic Growth scenario evaluates portfolio needs under expanded demand conditions to determine how accelerated system energy and peak demand trajectories impact long-term resource selection. Analyzing this trajectory establishes the incremental capacity, infrastructure, and procurement timing required to preserve system reliability and fulfill statutory zero-carbon mandates if load growth exceeds baseline projections.

9.6.1 Resource Additions by Specific Technology Type

To test portfolio robustness against upside load risk, the HEG scenario models system requirements under energy and peak demand expansion. Evaluating this higher trajectory reveals how increased load growth accelerates the need for new capacity into the near-term Focus Period, defining the advanced procurement required to preserve system reliability and fulfill statutory zero-carbon mandates.

- **Focus Period (2033–2036):** Unlike the LEG cases, incremental load growth eliminates near-term capacity margins, accelerating candidate supply-side additions directly into the Focus Period. To satisfy PRM requirements and maintain peak reliability, the modeling

brings forward between 852 MW and 1,063 MW of utility-scale solar, up to 199 MW of wind, alongside between 31 MW and 649 MW of short-duration BESS. These additions are reinforced by expanded demand-side management, including EE and DR programs. Importantly, there's an established need for firm and dispatchable resources in the focus period.

- **Planning Period (Through 2045):** Sustained demand growth, combined with the retirement of legacy natural gas assets, significantly compounds long-term capacity requirements. Satisfying final zero-carbon mandates while serving higher peak loads requires a significant expansion of clean firm dispatchable resources (1,434 MW to 1,862 MW), supported by extensive solar additions (1,546 MW to 1,814 MW), 420 MW of EE, large-scale BESS deployment, and expanded dynamic balancing resources across the remainder of the planning horizon.

TABLE 9-3. HEG CASES RESOURCE ADDITIONS BY TECHNOLOGY TYPE (MW NAMEPLATE)

Technology Type	Through 2036[a]		Through 2045[a]	
	Low[b] (MW)	High[b] (MW)	Low[b] (MW)	High[b] (MW)
Solar (Utility-Scale)	852	1,063	1,546	1,814
Wind Generation	0	199	0	199
Energy Efficiency	196	196	420	420
Carbon-Free Energy Total	**1,223**	**1,398**	**1,966**	**2,434**
Battery Energy Storage (BESS 4hr & 8hr)	31	649	624	888
Demand Response (DR)	15	46	22	52
Dynamic Balancing Total	**46**	**695**	**676**	**939**
Long-Duration Energy Storage (LDES)	0	300	0	300
Combustion Turbines (Gas/H_2)	0	0	0	358
Advanced Generator	0	80	0	720
Geothermal	0	0	0	0
Nuclear	0	0	876	1,022
Pumped Hydro	0	200	100	200
Firm Dispatchable Total	**80**	**400**	**1,434**	**1,862**

Notes:

a. Amounts through 2036 and through 2045 do not include existing, approved resources not yet in-service and pending resources not yet approved.

b. The 'Low' and 'High' columns within each individual load scenario do not represent low or high economic growth; rather, they represent the optimization bounds driven by variations in key modeling assumptions within that specific load future.

9.6.2 HEG Portfolio Costs

Evaluating the economic outcomes across the HEG scenario suite illustrates the financial impact of accelerated demand growth and advanced procurement timing. Total 20-year NPV system costs across HEG sensitivities range from $16,263 million to $16,861 million, reflecting the front-loaded capital investments and expanded capacity additions required to reliably serve higher peak loads and increased energy consumption.

Figure 9-17. HEG Core Cases – 20 Year NPV

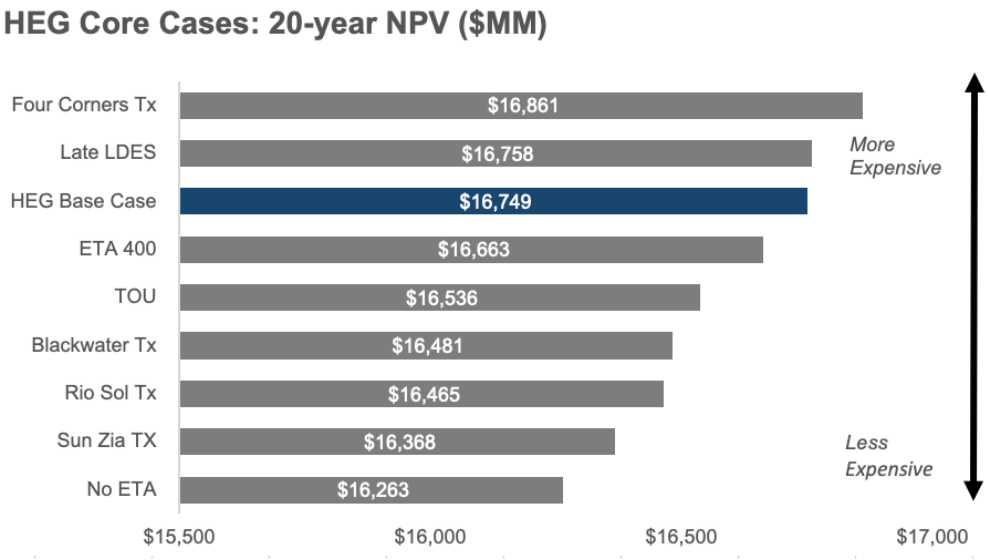
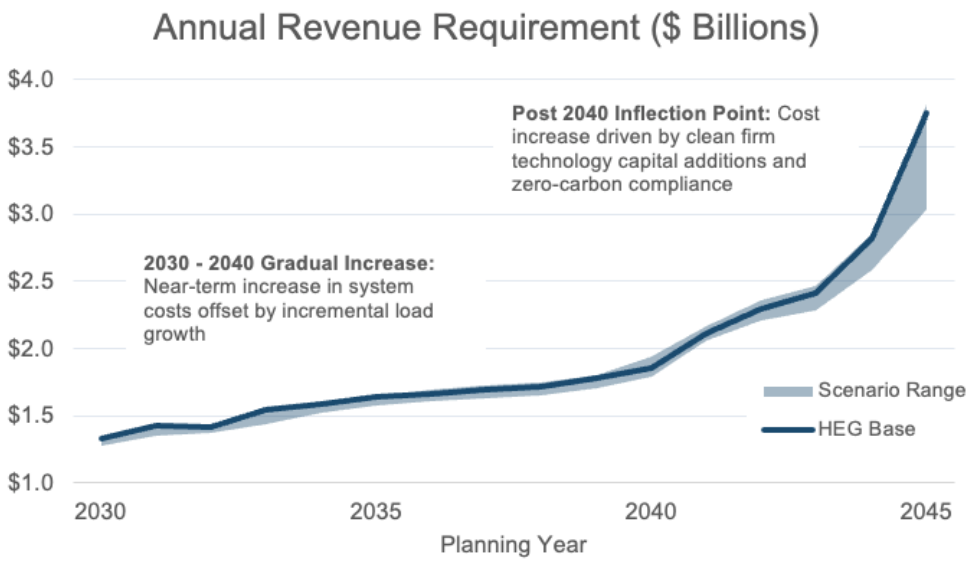


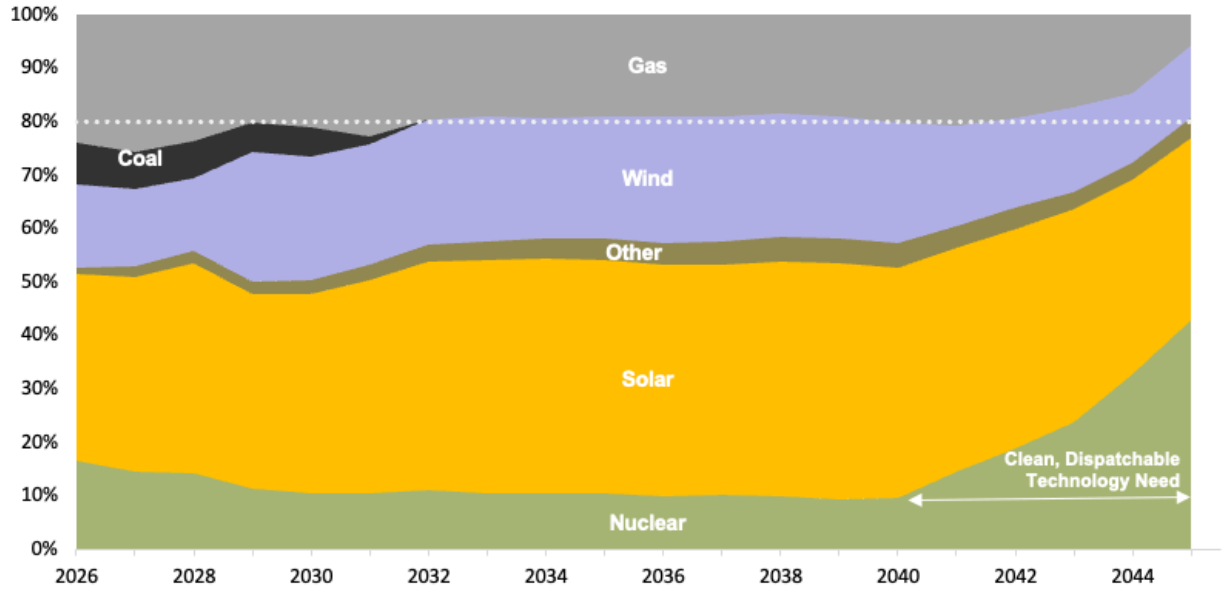
FIGURE 9-18. HEG CORE CASES – ANNUAL REVENUE REQUIREMENT (2030-2045)



9.6.3 HEG ENERGY GENERATION MIX

Despite higher load growth, the expanded buildout of renewable energy and early storage ensures the system continues to supply ~80% carbon-free energy across most of the planning horizon. To meet escalating RPS and carbon-intensity targets under higher overall energy burn, additional zero-carbon energy generation must be integrated into the mix alongside near-term additions.

FIGURE 9-19. 2026-2045 HEG BASE CASE - PROJECTED ENERGY MIX BY TECHNOLOGY (%)



9.6.4 Extreme Economic Growth Sensitivity

To capture the full spectrum of potential demand growth, PNM evaluated system performance under the Extreme Economic Development Load Growth (XEG) case. Examining this high boundary scenario illustrates the severe stress placed on grid infrastructure by substantially accelerated load expansion, driven by rapid data center development and concentrated industrial load additions, and identifies the significant capacity procurement required to resource adequacy and statutory compliance.

9.6.5 Resource Additions by Specific Technology Type

- **Focus Period (Through 2036):** Driven by extraordinary near-term load growth, resource additions scale dramatically to preserve reliability and meet clean energy requirements. To meet expanded energy requirements, the modeling adds 4,737 MW of utility-scale solar and 462 MW of wind, supported by 2,328 MW of short-duration BESS and 45 MW of DR. Crucially, extreme load growth creates an immediate requirement for firm, dispatchable capacity in the focus-period, requiring 760 MW of advanced clean generation, 500 MW of LDES, and 100 MW of pumped hydro storage (totaling 1,360 MW of firm capacity). These additions are further supported by 196 MW of EE.
- **Planning Period (Through 2045):** Sustained demand growth, combined with the retirement of legacy natural gas assets, exponentially compounds long-term capacity requirements. Satisfying zero-carbon mandates while serving extreme demand requires a significant long-term expansion of clean firm dispatchable resources (scaling to 3,622 MW, led by 2,000 MW of advanced generation and 1,022 MW of nuclear capacity). This firm foundation is supported by cumulative solar additions reaching 5,522 MW, 420 MW of EE, and expanded dynamic balancing resources across the remainder of the planning horizon.

TABLE 9-4. XEG CORE CASE RESOURCE ADDITIONS BY TECHNOLOGY TYPE (MW NAMEPLATE)

Technology Type	Through 2036 [a] (MW)	Through 2045 [a] (MW)
Solar (Utility-Scale)	4,737	5,522
Wind Generation	462	462
Energy Efficiency	196	420
Carbon-Free Energy Total	**5,396**	**6,405**
Battery Energy Storage (BESS 4hr & 8hr)	2,328	2,328
Demand Response	45	52
Dynamic Balancing Total	**2,373**	**2,379**
Long-Duration Energy Storage	500	500
Combustion Turbines (Gas/H_2)	0	0
Advanced Generator	760	2,000
Geothermal	0	0
Nuclear	0	1,022
Pumped Hydro	100	100
Firm Dispatchable Total	**1,360**	**3,622**

Notes:

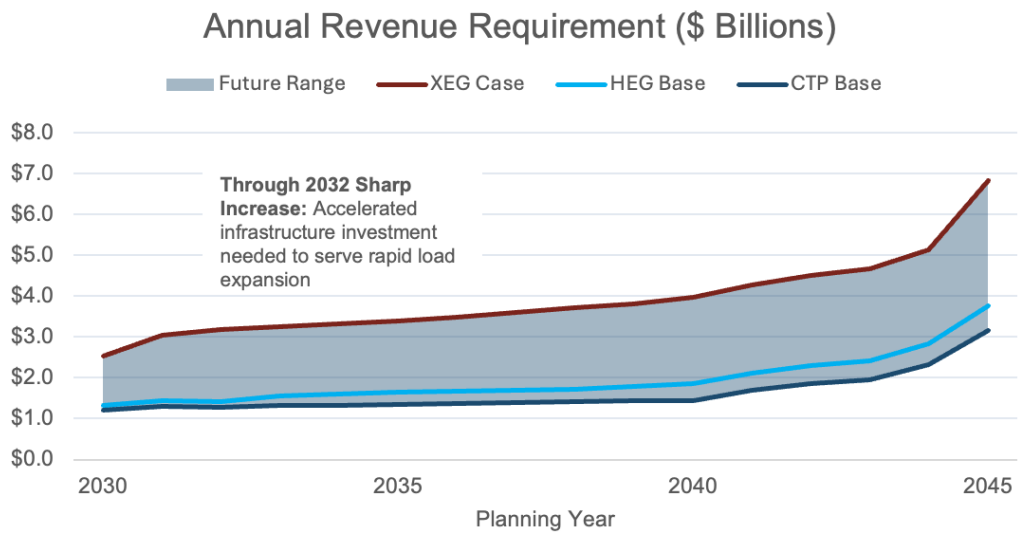
a. Amounts through 2036 and through 2045 do not include existing, approved resources not yet in-service and pending resources not yet approved.

9.6.6 XEG PORTFOLIO COSTS

Examining the economic outcomes across the XEG scenario underscores the substantial financial shift driven by hyper-accelerated load growth. Total 20-year NPV system costs reach $31,578 million, rising sharply above the CTP ($14,327 million) and HEG ($16,749 million) base cases, capturing the capital outlays required to build out an expanded grid infrastructure. This steep cost trajectory stems directly from compressing large-scale renewable development, BESS build-out, and next generation clean firm capacity into an expedited timeframe to keep pace with rapid large load interconnections. Importantly, these NPV figures reflect total gross system supply costs and do not account for the incremental retail revenues generated by increased electricity sales.

Figure 9-20 illustrates the annual revenue requirement trajectories for the CTP, HEG, and XEG scenarios through 2045.

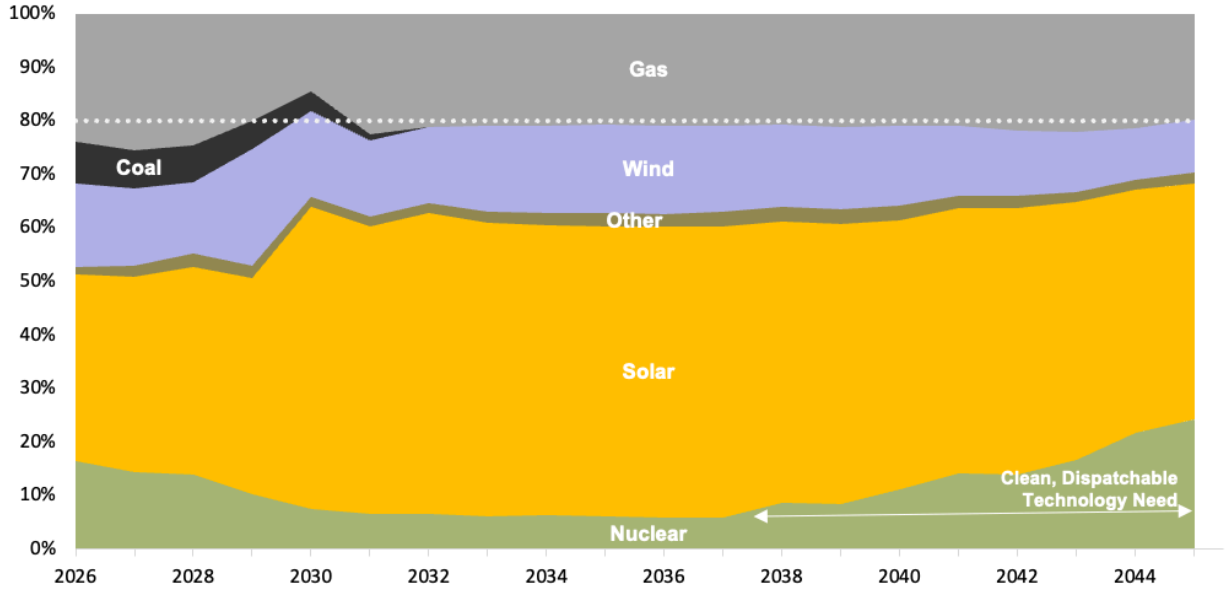
FIGURE 9-20. ANNUAL REVENUE REQUIREMENT TRAJECTORIES ACROSS SCENARIOS



9.6.7 XEG ENERGY GENERATION MIX

Despite extraordinary load growth, the significant, front-loaded deployment of zero-carbon resources enables the system to maintain statutory RPS compliance and strictly limit portfolio carbon intensity across the planning horizon. Under this hyper-growth scenario, substantial utility-scale solar additions serve as the primary resource for total energy generation. As legacy natural gas assets retire, this solar generation, supported by battery storage and expanded clean firm generation, ensures the portfolio scales its zero-carbon energy share in direct alignment with accelerating New Mexico environmental mandates.

FIGURE 9-21. 2026-2045 XEG BASE CASE - PROJECTED ENERGY MIX BY TECHNOLOGY (%)



9.7 Stakeholder Requested Scenario Analysis

In addition to the PNM driven-scenarios, a series of additional scenario cases to incorporate specific stakeholder-requested constraints and inputs were evaluated. While built upon the same foundational baseline assumptions as the primary futures described above, these sensitivities adjust key operational and policy parameters to model specific stakeholder perspectives.

Detailed portfolio capacities and capacity expansion plans for each candidate portfolio evaluated in this IRP are provided in Appendix N: Summary Results for Each Portfolio.

9.7.1 Stakeholder Scenario #1: Fusion Technology

Scenario Purpose

To evaluate the long-term potential of emerging technologies within PNM's resource portfolio, PNM conducted a sensitivity analysis examining the integration of commercial nuclear fusion generation within the HEG future. The primary objective was to evaluate whether fusion would be selected in a least-cost capacity expansion plan, including the optimal timing, scale, and economic performance of potential additions.

Additionally, this scenario assessed broader portfolio impacts, specifically evaluating fusion's potential to accelerate carbon emissions reductions relative to the baseline trajectory and quantifying the resulting impact on total revenue requirement.

Modeling Adjustments & Assumptions

Based on stakeholder input, the following cost parameters were incorporated as candidate resources starting in 2040:

Adjustment	Description	Suggested By
Commercial Fusion Candidate Parameters	Added Fusion starting in 2040 with parameters (2026$): • Capital Cost: $6,137 / kW • Fixed O&M: $75 / kW-year • Variable O&M / Fuel: $1.50/MWh	Stakeholder

Results and Key Findings

Under these modeling assumptions, the resulting capacity expansion portfolio selected 300 MW of fusion capacity per year from 2040 through 2045, building a cumulative total of 1,800 MW. The introduction of firm, low-cost fusion completely displaced all SMR capacity previously selected in the HEG base case. Because of its high-capacity factor and firm zero-carbon profile, the 1,800 MW fusion addition reduced the need for several other buildouts across the system, including 240 MW of hydrogen-capable gas, 300 MW net of pumped hydro, 262 MW of short-duration battery storage, 572 MW of solar, 199 MW of wind, and 32 MW of energy efficiency.

Overall, system NPV decreased from $17,237 million to $16,387 million, delivering $850 million in portfolio cost savings while driving a substantial acceleration in system-wide carbon emissions reductions.

Conclusion and PNM Takeaway

The scenario highlights that a low-cost, firm, dispatchable zero-carbon resource can significantly reduce the requirement for variable renewables and short-duration storage while simultaneously reducing system costs and accelerating decarbonization. While the sensitivity demonstrated lower cost results, commercial fusion remains in early stages of development. PNM will continue to track technological progress and market maturity, but notes that the commercial availability, firm pricing, and performance parameters modeled in this stakeholder scenario cannot be verified until such resources are submitted and evaluated through future competitive solicitations.

9.7.2 Stakeholder Scenario #2: Updates to Geothermal Cost Assumptions

Scenario Purpose

To evaluate whether conventional or enhanced geothermal generation would be selected in a least-cost expansion plan under lower capital cost assumptions, PNM modeled a dedicated scenario using the CTP future as a starting case. The primary objective of this stakeholder scenario was to determine the economic competitiveness, optimal timing, and portfolio impacts of incorporating firm geothermal capacity into the future resource mix.

Modeling Adjustments & Assumptions

Adjustment	Description	Suggested By
Conventional Geothermal Candidate Resource	Allowed up to 50 MW of conventional geothermal capacity starting in 2030 at $5,100/kW (2026$), escalated at 3% annually thereafter	Stakeholder
Enhanced Geothermal Candidate Resource	Allowed unlimited enhanced geothermal capacity starting in 2030 at $6,100/kW (2026$), escalated at 3% annually thereafter	Stakeholder
Geothermal Transmission Cost Adder	Applied a transmission interconnection and reinforcement cost adder of $286/kW (2026$)	PNM

Key Findings & Portfolio Dynamics

In the initial unconstrained optimization run, the model did not select either conventional or enhanced geothermal as part of the least-cost expansion portfolio. To evaluate the economic and operational impacts of integrating these firm resources, PNM conducted three constrained sensitivities forcing geothermal into the portfolio in 2033:

- Sensitivity 1: Forced selection of 50 MW of conventional geothermal.

- Sensitivity 2: Forced selection of 50 MW of enhanced geothermal.
- Sensitivity 3: Forced selection of 250 MW total geothermal (50 MW conventional + 200 MW enhanced).

Across these forced-build simulations, integrating firm geothermal capacity drove consistent portfolio reconfigurations:

- **Resource Shifts:** The addition of firm geothermal capacity enabled the system to incorporate 100 MW of LDES. These additions were counterbalanced by displacing 98 MW to 117 MW of short-duration battery storage, 8 MW to 19 MW of utility-scale solar, and 80 MW of hydrogen-ready gas generation. In sensitivity 3, the 250 MW combined sensitivity, geothermal capacity also displaced 146 MW of SMR capacity as compared to the MCEP.
- **System Cost Impacts:** Forcing geothermal resources into the portfolio increased total 20-year NPV system costs by $5 million to $153 million across the three simulated sensitivities. Applying the stakeholder cost of $6,100/kW to enhanced geothermal resulting in the lowest cost impact above the MCEP.
- **Break-Even Cost Analysis:** Holding all other operational and cost assumptions constant, PNM calculated the break-even capital cost needed for unconstrained model selection to be approximately $4,350/kW for conventional geothermal and $5,930/kW for enhanced geothermal by 2030.

Conclusion and PNM Takeaway

While geothermal resources were not selected in the unconstrained least-cost optimization, the relatively narrow cost delta between the approximate break-even point and stakeholder costs demonstrates that geothermal represents a potential promising candidate resource for meeting future firm zero-carbon capacity requirements. As geothermal technologies mature, PNM will continue to evaluate their commercial viability, capital costs, and resource availability, and will observe market-tested pricing as proposals are submitted through future competitive solicitations.

9.7.3 Stakeholder Scenario #3: Accelerated Decarbonization

Scenario Purpose

This scenario served a dual purpose. First, it evaluated a more gradual, stepped reduction in the carbon intensity of PNM's resource portfolio between the 200 lbs/MWh regulatory target in 2032 and New Mexico's zero-carbon mandate in 2045. Second, stakeholders sought to determine whether implementing a smoothed interim trajectory would mitigate the concentrated capacity additions and associated capital investment requirements modeled in 2045.

Modeling Adjustments & Assumptions

To test this approach, the following carbon intensity reduction trajectory was modeled:

Adjustment	Description	Suggested By
Incremental carbon intensity reduction	2026-2031: 400 lbs/MWh	Current Requirement
	2032-2034: 200 lbs/MWh	Current Requirement
	2035-2037: 155 lbs/MWh	Stakeholder
	2038-2040: 110 lbs/MWh	Stakeholder
	2041-2044: 65 lbs/MWh	Stakeholder
	2045: 0 lbs/MWh	Current Requirement

Results and Key Findings

Implementing an accelerated decarbonization schedule induced specific timing and resource adjustments across the portfolio:

- **Resource Displacements and Additions:** While total installed capacity through 2045 remained largely unchanged, the model selected an additional 100 MW of LDES and 53 MW of wind capacity compared to MCEP. These additions were offset by displacing 82 MW of short-duration BESS, 40 MW of hydrogen-ready gas generation, and 30 MW of demand response.
- **Portfolio Acceleration:** The primary impact of the accelerated schedule was pulling forward clean capacity additions to meet near-term carbon intensity limits. Most notably, this required advancing 292 MW of nuclear generation by three to five years, alongside earlier commercial operation dates for solar and short-duration storage assets.
- **Cost Impacts:** On an NPV basis, accelerating the decarbonization schedule increased by approximately $350 million due to the near-term capital requirements of advancing firm zero-carbon and renewable capacity.

Conclusion and PNM Takeaway

Meeting an optional interim clean energy trajectory under current market conditions presents clear cost and procurement challenges. However, PNM's historical performance demonstrates a track record of exceeding interim carbon reduction milestones, and the company will continue evaluating opportunities to accelerate decarbonization provided customer affordability and grid reliability are preserved.

9.7.4 Stakeholder Scenario #4: High Natural Gas Price Forecast

Scenario Purpose

Stakeholders proposed evaluating a scenario reflecting continued geopolitical disruption in the Persian Gulf, associated oil price escalation, and supply chain constraints on natural gas turbines driven by rapid data center expansion. Following consultation with stakeholders, the scope was

focused specifically on evaluating the impacts of a sustained high natural gas price forecast within the CTP modeling framework.

Modeling Adjustments & Assumptions

Adjustment	Description	Suggested By
Gas Price Sensitivity	Applied PNM's high natural gas price forecast across the planning horizon in the CTP base case	Stakeholder

Results and Key Findings

When higher natural gas prices are introduced, the capacity expansion model shifts to insulate the portfolio from elevated fuel costs by accelerating non-emitting resources, though the final long-term resource mix remains virtually identical to the base case. To mitigate higher operational expenses, the model accelerates the addition of 146 MW of nuclear capacity by 4 years relative to baseline timing. Similarly, near-term deployments of solar and short-duration energy storage are moved forward significantly to offset fuel burn during high-cost hours. Consequently, the entry of hydrogen-capable natural gas generators is deferred by 2 to 4 years, though these resources are still ultimately constructed in the same total capacity volumes by the end of the planning horizon. Applying higher underlying fuel prices increases the overall system revenue requirement, raising total portfolio costs by $1,028 million NPV.

Conclusion and PNM Takeaway

This sensitivity demonstrates that while sustained high gas prices adjust the near-term timing of capacity additions, pulling clean resources forward and deferring gas investments, they do not fundamentally alter the ultimate destination of the resource mix. PNM will continue to evaluate fuel price volatility across a range of market forecasts and observe actual market responses through upcoming competitive solicitations.

9.7.5 Stakeholder Scenario #5: High BTM Solar & TOU

Scenario Purpose

To evaluate how customer-side resources and TOU rate structures influence utility-scale procurement, PNM modeled two distinct scenarios built on the CTP baseline with a high BTM solar forecast.

- **High BTM Solar Only:** Replaces the reference BTM solar adoption forecast with a high growth trajectory.
- **High BTM Solar and TOU Adoption:** Combines the high BTM solar forecast with widespread TOU rate adoption.

Modeling Adjustments & Assumptions

Adjustment	Description	Suggested By
High BTM Forecast	Replaced reference BTM solar adoption with the High BTM solar forecast trajectory in the CTP framework	Stakeholder
Default TOU rate sensitivity/ EV-TOD or managed EV charging sensitivity	Applied a default TOU rate structure starting in 2030, assuming approximately 80% customer participation, including 80% participation among EV customers	Stakeholder
Two-scenario extensions	Modeled the adjustments both as a standalone High BTM solar case and as a combined High BTM + TOU case	Stakeholder

Key Findings & Portfolio Dynamics

Expanding customer-side solar and active load management flattens system net demand, enabling PNM to defer or avoid both utility-scale thermal capacity and clean energy builds.

- In the High BTM Solar Only Scenario, customer-sited generation reduces utility-scale buildouts by avoiding 40 MW of hydrogen-capable natural gas and 66 MW of utility-scale solar. Assuming no additional administrative or program implementation expenses, this shift yields $160 million in NPV cost savings.
- In the High BTM Solar and TOU Adoption Scenario, active load shifting further reduces system peak requirements. This combined approach avoids a cumulative 80 MW of hydrogen-capable gas, 87 MW of short duration energy storage, 62 MW of utility-scale solar, and 46 MW of utility DR programs. Total system cost savings increase to $282 million NPV (excluding administrative or program costs).

Comparing the two runs demonstrates high participation in TOU rates delivers an incremental $122 million in NPV savings (excluding program costs) while displacing 46 MW of traditional utility demand response during the focus period.

Conclusion & PNM Takeaway

These sensitivities illustrate that expanded distributed solar and high TOU participation can meaningfully reduce bulk system peak requirements, lowering total supply-side capital commitments and overall NPV costs. Because these estimates do not account for the administrative, marketing, or infrastructure expenses required to achieve 80% rate adoption, PNM will continue to evaluate the full cost-effectiveness of these customer programs and monitor real-world adoption trends through future rate dockets and market solicitations.

9.7.6 Stakeholder Scenario #6: Incremental Demand Response Programs

Scenario Purpose

To evaluate the capacity value of expanded demand-side management, PNM modeled a scenario testing the extension and expansion of existing direct load control programs. Specifically, this sensitivity examines the portfolio and financial impacts of extending PNM's Power Saver program through 2045 alongside a 25% increase in program magnitude across both Power Saver and water heater load control portfolios, combined with high BTM solar adoption and TOU rate design.

Modeling Adjustments & Assumptions

Adjustment	Description	Suggested By
High BTM Solar Forecast	Replaced reference BTM solar adoption with the High BTM Solar forecast trajectory	Stakeholder
Time-of-Use (TOU) Sensitivity	Applied the default TOU rate design assumptions established in Scenario #5	Stakeholder
Power Saver Extension & Expansion	Forced in the Power Saver program through 2045 and expanded total potential magnitude by 25%	Stakeholder
Water Heater Program Expansion	Forced in smart water heater load control programs through 2045 with a 25% increase in potential magnitude	Stakeholder

Key Findings & Portfolio Dynamics

Forcing in the extended and expanded DR programs adds 39 MW of incremental DR capacity to the portfolio.

The addition of this controllable demand-side capacity primarily shifts the utility-scale storage expansion plan. The incremental DR enables the system to avoid 100 MW of LDES during the focus period. To complement the shifted load profiles and maintain intra-day balancing, the model selects a modest addition of 20 MW of short-duration battery storage and 10 MW of utility-scale solar.

Overall, incorporating this expanded DR portfolio yields $233 million in total NPV savings across the planning horizon, assuming zero incremental administrative, equipment, or customer incentive program costs.

Conclusion & PNM Takeaway

This sensitivity highlights that expanding direct load control programs like Power Saver and water heater management can effectively displace higher-cost long-duration utility storage assets while lowering overall portfolio net present value costs. However, because these model runs assume zero incremental program delivery expenses, PNM notes that the net economic benefit in practice will depend on actual program administration costs, technology enablement expenses, and

customer enrollment rates, which PNM will continue to evaluate through future demand-side management filings and market solicitations.

Stakeholder Input: Analyze Impact of Distributed Generation with Local Storage Backup

Stakeholders expressed interest in PNM evaluating how distributed generation resources, such as behind-the-meter solar can work in tandem with local storage resources. PNM analyzed these impacts through a stakeholder requested scenario.

9.7.7 Stakeholder Scenario #7: VPP Integration & Direct Load Control

Scenario Purpose

To evaluate the impact of rapidly developing distributed energy resources on utility capacity expansion, PNM modeled a scenario examining high Virtual Power Plant growth. This scenario builds upon the high BTM solar, TOU rate design, and expanded DR baseline established in Scenario #6 by layering on high battery storage attachment rates for residential BTM solar installations and enrolling those customer batteries into a DLC VPP program.

Modeling Adjustments & Assumptions

Adjustment	Description	Suggested By
High BTM Solar Forecast	Replaced reference BTM solar adoption with the high BTM Solar forecast trajectory	Stakeholder
TOU Sensitivity	Applied the default TOU rate design assumptions established in Scenario #5	Stakeholder
Expanded DR	Retained the extended Power Saver and smart water heater expansions (+25% magnitude through 2045) from Scenario #6	Stakeholder
VPP / Battery-DLC Deployment	Updated Battery-DLC potential assuming: • New Solar: Starting in 2030, 50% of new BTM solar includes a 4-hour battery, with 90% enrolled in VPP (up to 60 dispatch events/year) • Retrofit Solar: Starting in 2029/2030, 1% of existing BTM solar retrofits a 4-hour battery annually, with 90% enrolled in VPP	Stakeholder

Key Findings & Portfolio Dynamics

The high adoption and dispatch of customer-sited batteries provide 58 MW of incremental dispatchable capacity to the system during the focus period via the VPP program.

This additional firm, distributed capacity significantly alters the timing and mix of utility-scale additions. The aggregate VPP contribution enables the portfolio to defer 100 MW of LDES and reduce utility-scale solar additions by 108 MW during the focus period. To maintain energy balance across off-peak and overnight hours, the model compensates by increasing utility-scale wind capacity by 75 MW.

Economically, adding the VPP battery program generates an incremental $100 million in NPV cost savings beyond Scenario #6, bringing total portfolio cost savings to $333 million NPV (assuming zero program or customer incentive costs and battery RTE degradation).

Conclusion & PNM Takeaway

This analysis demonstrates that customer-sited battery VPPs can serve as an effective substitute for utility-scale solar and long-duration storage while enhancing overall portfolio value. However, capturing these savings depends on customer willingness to invest in customer sited batteries, high enrollment retention across 60 annual dispatch events, and manageable utility administrative costs. PNM believes the adoption rates for solar and associated customer owned battery storage in this stakeholder scenario are extremely high and is unlikely to materialize in PNM's service territory. PNM will monitor customer adoption metrics and test distributed storage capabilities through future demand-side management filings and market solicitations.

9.7.8 Stakeholder Scenario #8: Geothermal Generation & LDES Requirements

Stakeholders requested a scenario to test whether adding geothermal generation would eliminate the need for LDES. PNM and stakeholders agreed that this evaluation was already fully captured within the modeling framework of Scenario #2.

9.7.9 Stakeholder Scenario #9: Impact of EDAM on PRM

Stakeholders initially requested a scenario evaluating whether participation in EDAM could reduce PNM's PRM. Following technical discussions, both parties agreed this scenario was unnecessary and was not modeled.

9.7.10 Stakeholder Scenario #10: Transmission Reliability benefits

Scenario Purpose

To evaluate the impact of major regional transmission line expansions on system reliability, capacity additions, and total portfolio costs, PNM first calculated the PRM benefit provided by increased import capacity. PNM then conducted additional capacity expansion modeling using the revised PRM to determine the downstream impacts on required capacity additions and overall portfolio costs.

Modeling Adjustments & Assumptions

Adjustment	Description	Suggested By
Increased Summer Import Capacity	• Double summer import capacity from 50 MW to 100 MW to calculate the resulting reduction in the PRM requirement • Update the EnCompass™ modeling with the reduced PRM	Stakeholder

Key Findings & Portfolio Dynamics

Doubling the summer import capacity from 50 MW to 100 MW yielded a ~1.4% reduction in the required PRM, equivalent to approximately 40 MW.

Because this reliability benefit is less than 1:1 relative to the 50 MW import increase, it demonstrates that import capability is not the sole limiting factor; during certain critical periods, external regional resource availability limits transfers regardless of available transmission line capacity.

Because the reduced PRM lowers overall reserve requirements, the portfolio requires fewer dispatchable resources. Specifically, the capacity expansion model selects 40 MW less hydrogen-capable gas generation and approximately 20 MW less short-duration battery energy storage, lowering total portfolio costs by approximately $50 million NPV.

Conclusion & PNM Takeaway

While this stakeholder scenario illustrates that higher transfer limits could theoretically lower PRM requirements and reduce local capacity needs, PNM emphasizes that physical transfer capability does not equal deliverable firm energy. Realizing true reliability savings requires surplus generation in neighboring markets during critical periods.

Relying on external imports for resource adequacy without binding contractual structures or formal regional accrediting mechanisms poses reliability risks during widespread heat events or winter storms. PNM will evaluate these potential benefits through formal participation in emerging regional resource adequacy programs rather than assuming firm deliverability in baseline planning.

9.7.11 Stakeholder Scenarios #11 & 12: Combined Multi-Input Sensitivities

Scenario Purpose

To evaluate an alternative decarbonization pathway, Scenarios #11 and #12 integrate select modeling components from prior stakeholder requests alongside targeted new parameter adjustments. By bundling these multi-faceted changes, including updated technology cost curves, tax credit extensions, modified technology availability, and high demand-side resource adoption assumptions, Scenario #11 evaluates how a distinct combination of energy strategies impacts long-term capacity expansion and portfolio costs relative to the baseline. Scenario #12 builds

directly upon Scenario #11 by evaluating the additional impact of removing a 172 MW placeholder gas unit in 2029.

Adjustment	Description	Suggested By
Stakeholder Scenario #2 Integration	As described in Stakeholder Scenario #2	Stakeholder
Stakeholder Scenario #7 Integration	As described in Stakeholder Scenario #7	Stakeholder
Geothermal & SMR Tax Credits	Included Investment ITC step-down trajectory for Geothermal and SMR assets: • 2026–2033: 30% • 2034: 22.5% • 2035: 15% • 2036+: 0%	Stakeholder
SMR Commercial Availability	Deferred the first available online date for SMR from the baseline to 2040	Stakeholder
Technology Options	Removed hydrogen conversion capability for thermal units and carbon capture and sequestration	Stakeholder
Placeholder Gas Removal (Scenario #12 Only)	Removed the 172 MW placeholder gas generation unit modeled in 2029	Stakeholder

Key Findings & Portfolio Dynamics

Scenario #11 Results: Incorporating these multi-faceted stakeholder changes results in substantial shifts to the focus period resource buildout, specifically adding 350 MW of enhanced geothermal and 129 MW of DR, while reducing solar by 392 MW and LDES by 100 MW during 2030-2036. Overall, the scenario yields a $564 million 20-year NPV cost reduction. This economic improvement is driven by a combination of higher behind-the-meter solar adoption, expanded TOD participation, and high battery DLC potential, further compounded by favorable cost assumptions including geothermal ITC, and deferred nuclear and LDES adoption.

Scenario #12 Results: Building upon Scenario #11, explicitly removing the 172 MW placeholder gas unit in 2029 requires the model to add just 23 MW of short-duration BESS and 23 MW of solar during 2030-2036. This modest capacity replacement occurs because the compound adjustments already embedded in Scenario #11 (e.g., high demand-side adoption) offset the need for the dispatchable capacity. Avoiding the capital and operational costs of the gas turbine increases total portfolio cost savings from $564 million to $799 million NPV.

Conclusion & PNM Takeaway

While this multi-input stakeholder scenario demonstrates significant potential cost reductions ($564 million NPV), PNM emphasizes that these results rely on highly aggressive and potentially unrealistic modeling assumptions across several key areas:

- Optimistic Geothermal Cost Structures: The scenario assumes a 2030 enhanced geothermal capital cost of $6,100/kW, which is significantly below PNM's third-party consultant forecast ($11,165/kW in 2030). Additionally, the portfolio's economics depend heavily on the federal ITC, which is currently unavailable after 2035.
- Unsubstantiated Demand-Side Expansion: The model incorporates 1,035 MW of BTM solar by 2045, well above PNM's baseline adoption trajectory. Because capital costs for customer-sited solar are borne directly by participants rather than modeled as utility investments, this creates an artificially lower portfolio NPV.
- Aggressive Storage Attachment & Zero-Cost Assumptions: Reaching 328 MW of battery DLC potential assumes a 50% battery attachment rate on new BTM solar and a 1% annual retrofit rate on existing systems (rates far exceeding current expectations). Furthermore, because customer battery capital costs and utility administrative/incentive costs are excluded from the model, the portfolio's cost savings are overstated.

PNM will continue to track emerging geothermal cost trends, tax credit policies, and customer adoption metrics, but caution against relying on these optimistic inputs for baseline resource planning.

9.8 Affordability

9.8.1 Affordability Factors

Customer affordability is one of the three major objectives, including reliability and environmental impact, PNM considers when optimizing its long-term plans. PNM's plans should also consider how best to manage the pace and magnitude of investments in light of customer rate impacts. Affordability is not evaluated separately from reliability or environmental performance; rather, it is considered as part of critical balance that must be struck to ensure customers can receive services while the state progresses toward its carbon-free future.

These affordability principles (outlined in Section 1.6.3) are especially important where significant new load could otherwise create cost-shift risk for existing residential and small business customers. Large-load customers can provide economic development benefits and help spread fixed costs across a larger customer base, with appropriate tariff structures, service agreements, and cost-allocation mechanisms to ensure that those customers pay their share of the incremental costs and an appropriate share of existing system costs. The IRP recognizes that customer growth can support affordability when it is paired with disciplined planning and appropriate customer protections.

To mitigate customer impacts, PNM is considering a range of strategies that can help maintain affordability while supporting reliability and clean energy policy objectives. These include:

- Large-load tariffs and service agreements that include take-or-pay provisions, collateral requirements, exit protections, and cost allocation aligned with cost causation.
- Flexible load programs, interruptible or curtailable service options, DR, and time-varying rates that reduce demand during constrained or high-cost hours and encourage usage when renewable energy is abundant.
- EE, DSM, and customer programs that reduce or shift load and can lower the amount of infrastructure needed to serve peak conditions.
- Diversified resource portfolios that include various sources and geographies for renewable energy, storage, firm dispatchable capacity, demand-side resources, and regional market opportunities to reduce exposure to fuel volatility, technology risk, and extreme weather conditions.
- Strategic transmission investments and grid-enhancing technologies (GETs) that expand access to lower-cost resources, reduce congestion and renewable curtailment, increase market participation, and improve system resilience.
- State or federal funding, tax credits, securitization, low-cost financing, rate riders, and other targeted cost-recovery mechanisms that may reduce financing costs, smooth rate impacts, or accelerate investments that provide customer value. These are topics that could be addressed through the working group Action Plan item.

These tools are complementary. For example, time-varying rates and DR can reduce peak needs; regional market participation can lower energy costs and improve access to diverse resources; and transmission expansion can reduce congestion and support both load growth and renewable integration. When considered together, these options may reduce the amount of new infrastructure needed, improve utilization of existing assets, and help manage total system cost.

Large-load growth is one of the most significant affordability issues facing the electric utility industry at a national and global level. New industrial, manufacturing, data center, and other high-load-factor customers may require substantial generation, storage, transmission, and distribution additions. Without appropriate protection, these additions could increase costs for existing customers. As described in the 2026 IRP Action Plan, PNM will be seeking approval of a large load tariff governing allocation of dedicated facilities and resources needed to serve them, require large customers to provide sufficient credit support, make long-term service commitments, and bear the financial consequences of material reductions or cancellations in load that leave system costs behind.

At the same time, large loads can provide system benefits when they are flexible, located where infrastructure can support them efficiently, and are willing to align operations with grid conditions. Flexible large-load programs can operate similarly to a resource by reducing demand during risk hours, shifting consumption to periods of high renewable output, or responding during emergency conditions. Going forward, PNM plans to further evaluate ways to treat flexible load as an affordability and reliability tool, not merely as a customer-service option.

The rate impact analysis that follows provides an illustrative measure of how the affordability considerations reflected in the 2026 IRP modeling could affect customers. It translates the technologies and quantities selected in the CTP and HEG base portfolios into potential revenue requirements and average system rate impacts. The 2026 IRP also recognizes that certain

affordability issues can only be meaningfully addressed in future regulatory and rate review proceedings. Resource approvals, transmission expansion, rate design, securitization, cost allocation, prudence review, and tariff changes remain subject to Commission review. The IRP does not pre-approve those costs; instead, it provides a planning framework that informs future filings and demonstrates how PNM is evaluating customer impacts as part of its long-term resource strategy.

PNM's customer affordability strategy is to pursue an integrated, disciplined, and flexible resource plan that reliably serves customers, meets New Mexico's clean energy requirements, supports economic development, and protects existing customers from undue cost shifts. The best approach is not a single program or filing; it is the coordinated use of integrated resource planning, cost-causation principles, large-load customer protections, demand-side resources, regional market participation, strategic transmission investment, and potential legislative or regulatory tools that can collectively reduce long-term customer risk.

9.8.2 Rate Impacts

A measure of affordability associated with IRP findings is the indicative rate impact to customers of the candidate portfolios. This section provides a discussion of potential revenue requirements and rate impacts based on the technologies and quantities selected for the CTP and HEG futures studied in the IRP. The analysis does not consider how the various sensitivities applied to each future would potentially impact results.

PNM recently filed the 2029-2032 resource applicat[48] with the NMPRC. As discussed in more detail in Section 1.5, PNM's resource plan proposed in that application included new resources to serve substantial increases in load as well as addressing existing resource retirements or abandonments. The resource application included illustrative information on the potential revenue requirements and customer rate impacts of the proposed application resources.

Based on PNM's last approved general rate case, base rates are designed to collect $866.1 million in non-fuel revenue requirement[49]. Within the 2029-2032 resource application, the total revenue requirement for new resource additions was estimated at $501.3 million in 2031. PNM provided illustrative class allocations designed to collect the total revenue requirement shown in Table 9-5.

[48] Docket No. 26-0000114

[49] Docket No. 24-00089-UT: PNM's last approved general rate case.

TABLE 9-5. REVENUE REQUIREMENTS PROVIDED IN DOCKET NO. 26-0000114

Category	Value
Non-Fuel Revenue Requirement (Docket No. 24-00089-UT Approved Stipulation)	$866,083,648
2030 Forecasted Fuel Revenue Requirement	$239,111,642
2031 Test-Year Incremental Revenue Requirement (Docket No. 26-0000114)	$501,291,244
Total Revenue Requirement	**$1,606,486,534**

The average total system rate, using the total revenue requirement above, is $0.09525 per kWh. The illustrative information in the filing, which sets the baseline for comparison, does not account for any distribution system cost changes, or any transmission system cost changes that are not associated with interconnecting and delivering the resources requested in the filing.

CTP

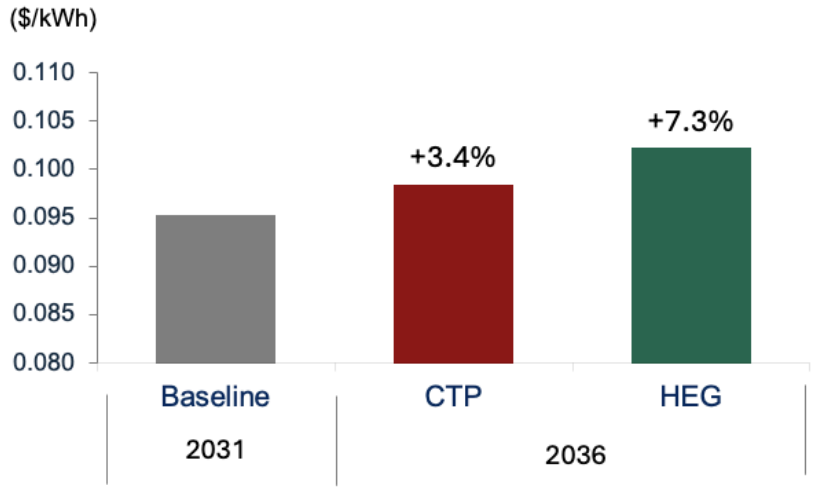
Using the resource filing rate impact illustration as a baseline, PNM evaluated the potential rate impact of the technologies and amounts identified in the CTP base case (case defining the MCEP). The analysis is based on the incremental revenue requirement for resources added through 2036 (i.e. the end of the 2026 IRP focus period) over the 2029-2032 resource application. The revenue requirement increase from addition of these resources was $229M with a total increase in energy sales of 1,780,000 MWh. The resulting system average 2036 rate is $0.09845 per kWh which represents an increase of approximately 3% over the illustrative 2031 rate in the 2029-2032 resource filing.

HEG

The rate impact associated with the HEG base case was also evaluated for illustrative purposes. The total resources in the HEG base case by 2036 are higher than with the CTP. The incremental revenue requirement for the HEG resources over the resource application was $519M (vs $229M for the CTP resources) with additional sales of 3,932,000 MWh. This yielded a new system average 2036 rate of $0.1022 per kWh which represents an increase of approximately 7% over the 2031 estimated rate in the 2029-2032 resource application.

Figure 9-22 provides a comparison of the illustrative rate impacts of the CTP and HEG to the information in the 2029-2032 resource application.

FIGURE 9-22. SYSTEM AVERAGE RATE



9.9 Qualitative Risks to PNM's Portfolio

With few exceptions, many of the risks identified and discussed below are relevant to all scenarios considered in the 2026 IRP. The identification of risks that are common across scenarios reinforces the necessity of strategies to mitigate those risks as a central element of PNM's continued transition toward a carbon-free portfolio by 2045, and many of the items in PNM's Action Plan are informed by the challenges ahead.

9.9.1 RESOURCE DEVELOPMENT

Resource development presents a resource planning risk because the resources identified through the IRP process cannot be assumed to be available exactly when needed, or in the same form, cost, or quantity modeled in the planning analysis. The ultimate portfolio used to meet customer needs will depend on competitive solicitation results, market conditions, technology availability, regulatory approvals, construction progress, and broader industry trends that cannot be fully known at the time the IRP is developed. For this reason, the IRP does not prescribe the specific resources that will ultimately be procured, but instead identifies resource needs, risks, and decision pathways to guide future procurement decisions while preserving flexibility. PNM mitigates this risk by designing its planning and procurement processes to be adaptive and iterative, allowing future decisions to reflect updated market conditions, load forecasts, technology performance, and solicitation results.

This risk is particularly important because generation and transmission projects often require long development timelines. New resources and associated system expansion require time to design, clear interconnection queues, procure equipment, and construct before they can support system reliability. If procurement or development activities begin too late, needed resources may not be available in time to address load growth, planned retirements, or reliability requirements. PNM is mitigating this timing risk by expanding its forward planning horizon and initiating procurement well in advance of resource need dates. The 2026 IRP identifies a Focus Period for resources expected to enter service between 2033 and 2036, while the Action Plan includes steps to issue

an all-source RFP for supply-side and demand-side resources needed during that period. This earlier procurement approach is intended to provide additional lead time and broaden the pool of potential bidders.

Resource development risk is further amplified by current supply chain and market constraints. The document identifies an industry environment in which electricity demand growth has outpaced equipment manufacturing capacity, specialized labor availability, and raw material supply. Delivery schedules for long-lead equipment, including main power transformers, combustion turbines, and high-voltage circuit breakers, have extended from months to several years. PNM is mitigating this risk by planning further ahead, ordering or enabling procurement of long-lead equipment earlier, and conducting competitive solicitations far enough in advance to help insulate project schedules from manufacturing backlogs and supply chain constraints.

PNM also mitigates resource development risk through continued regulatory and implementation activities. The Action Plan includes pursuing regulatory approvals and advancing construction efforts for resources associated with the 2029-2032 system needs, continuing the evaluation and selection process under the 2029-2032 All-Source Generation Resource RFP Supplement, and preparing for future procurement to address 2033-2036 needs. In addition, PNM is preserving optionality by evaluating demand-side resources, advancing DSM programs, monitoring emerging clean firm and long-duration storage technologies, and continuing transmission and advanced grid technology analysis. Together, these actions reduce the risk that resource development delays, market constraints, or technology uncertainty will compromise reliability, affordability, or progress toward a carbon-free system.

9.9.2 Transmission Development

Transmission line and equipment development is a material resource planning risk because new generation resources must be deliverable to customers before they can provide full reliability or economic value. As PNM's portfolio evolves to serve load growth and support decarbonization, additional transmission infrastructure may be needed to connect new resources, relieve constraints, and enable access to neighboring systems and regional markets. PNM's existing transmission system is already constrained at times and many resources capable of meeting future needs are located in areas that may require new transmission investment.

This risk also affects both portfolio feasibility and timing. Transmission development can require extensive planning, interconnection studies, permitting, equipment procurement, construction, and coordination with neighboring systems. If transmission upgrades or related equipment are delayed, resources selected through the IRP may not be deliverable on the schedule assumed in the planning analysis, potentially affecting reliability, costs, curtailment, congestion, and the ability to meet resource adequacy needs. PNM's IRP recognizes the interdependence between resource planning and transmission planning, including the need to account for deliverability constraints, interconnection timing, and transmission-related costs when evaluating future portfolios.

Transmission equipment risk is further heightened by broader market conditions, including supply-chain constraints, permitting challenges, inflationary pressures, and increased demand for generation, storage, and transmission equipment. These factors have contributed to longer development timelines and reinforce the need for proactive, coordinated planning. PNM is

addressing this risk by strengthening the integration of transmission analysis into the IRP, using nodal transmission modeling, evaluating transmission alternatives, and coordinating resource and transmission planning through an integrated system planning approach. These efforts help ensure that future resource portfolios are not only economically attractive, but also technically feasible and deliverable under evolving system conditions.

9.9.3 Operational and Performance Uncertainty

Operational and resource performance is a resource planning risk because a portfolio that appears sufficient on an installed-capacity basis may not perform as expected under actual system conditions. PNM's IRP recognizes that reliability depends on whether resources can serve load across a range of weather conditions, outage events, renewable production patterns, operating reserve requirements, and market conditions. For this reason, PNM evaluates resource adequacy using probabilistic reliability modeling and provides resource accreditation based on their effective contribution to reliability, rather than assuming all resources provide the same capacity value.

This risk varies by technology. Wind and solar output fluctuate with weather and time of day, storage resources are limited by discharge duration and charging opportunity, and firm resources may be unavailable during forced outages. These performance characteristics affect whether resources are available during critical periods, which may occur outside traditional peak-load hours as the portfolio includes more renewable and energy-limited resources.

Operational performance also creates planning risk because real-time reliability requires resources that can respond to changing system conditions. PNM must maintain operating reserves to respond to unforeseen events, balance normal variations in load and renewable generation, and meet applicable NERC and WECC reliability requirements. As renewable penetration and energy-limited resources increase, the timing and nature of reliability risk may change, reinforcing the need for resources that can provide energy, capacity, flexibility, and responsiveness in the timeframes when system needs arise.

PNM mitigates this risk by using resource adequacy methods that evaluate performance across many potential operating conditions, including load variability, weather patterns, resource availability, forced outages, and operating reserve needs. The IRP also considers alternative reliability metrics, such as expected unserved energy and loss-of-load hours, and evaluates the role of firm resources, storage, demand-side resources, and regional market access in maintaining reliability under stressed conditions. This approach helps ensure that resource planning decisions reflect not only the quantity of capacity added, but also the ability of the portfolio to perform when reliability risks occur.

9.9.4 Load Forecast

Load forecast uncertainty is a key resource planning risk because future demand directly affects the timing, amount, and type of resources PNM must procure to maintain reliability. The 2026 IRP recognizes that load growth may vary materially due to economic development, data center activity, electrification, behind-the-meter solar adoption, energy efficiency, weather, and policy-driven changes in customer energy use. To address this uncertainty, PNM evaluates multiple load

scenarios and sensitivities rather than relying on a single forecast, using historical load and weather data, customer class forecasts, economic assumptions, end-use modeling, and climate-adjusted weather years.

This uncertainty creates risk in both directions. If actual load growth exceeds the forecast, PNM may face reliability challenges, accelerated capacity needs, greater dependence on market purchases, or shorter procurement timelines. If load growth is lower than forecast, PNM could procure resources earlier or in greater quantities than needed, increasing customer costs and reducing planning flexibility.

By testing low, expected, and higher-growth load futures, PNM can better understand how resource needs change under different demand outcomes. Under a High Economic Growth future, resource needs increase significantly as economic development and electrification accelerate, while under a Low Economic Growth future, existing and near-term resources remain sufficient for a longer period. This scenario-based approach helps PNM identify a resource plan that can meet expected needs while preserving flexibility to scale procurement up or down as actual load growth becomes clearer.

9.9.5 Wholesale Markets

PNM's planning depends increasingly on evolving regional energy markets and the availability of regional support during constrained conditions. Joining EDAM in October 2027 is expected to expand the benefits realized through the WEIM and reduce seams risk. PNM is also transitioning from WRAP and helping design an EDAM-aligned resource-adequacy program to better coordinate regional resource scheduling and delivery.

Importantly, participation in these markets does not relieve PNM of its obligation to arrive with sufficient capacity: WEIM and EDAM participants must pass resource-sufficiency tests, and neither program alters planning reserve requirements. The regional grid continues trending toward abundant solar and low daytime prices with scarcity in the evening. PNM must therefore be prepared to be self-reliant when the region cannot support its system, procuring sufficient renewable resources and transmission rights to meet load throughout the year rather than depending on other jurisdictions. Consistent with this principle, PNM's modeling framework only includes market transactions post determination of capacity expansion plans. This methodology ensures that prospective portfolios identified in the IRP are not dependent upon off-system sales or market purchases. Rather, PNM's expansion plans are sufficient to serve customer demand and energy requirements while also meeting established policy considerations such as mandated ETA compliance. Concerning reliability and costs to customers, PNM's 2026 resource-adequacy study incorporates reasonable seasonal import limits—50 MW during summer net-peak hours and, in winter, 250 MW overnight and 800 MW during daylight hours—to avoid over-reliance on imports that would expose customers to high market prices and lost-load risk during peak events.

9.10 Key Findings of Portfolio Results

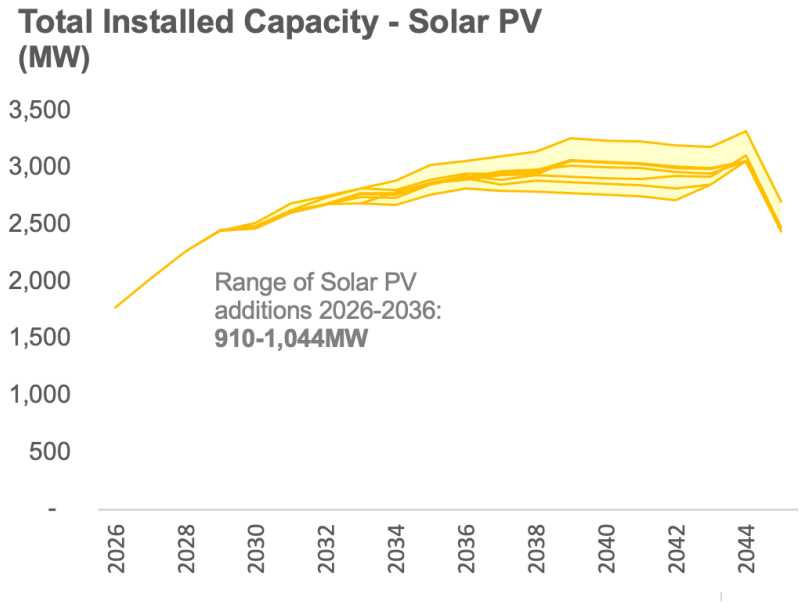
Examining the results across all core cases under each future and stakeholder sensitivities highlights key trends in PNM's baseline system requirements and points toward the most cost-effective resource strategies to meet them:

Key Finding 1. Solar Serves as Core Resource Across All CTP Portfolios

New renewable generation plays a foundational role in meeting near-term system needs and supporting progress toward PNM's long-term clean energy goals:

New renewable generation plays a foundational role in meeting near-term system needs and driving long-term clean energy progress. Across all CTP sensitivity cases, total installed solar capacity grows by 910 MW to 1,044 MW between 2026 and 2036, continuing to build through 2040. This growth includes 629 MW of near-term planned solar additions, supplemented by 281 MW to 415 MW of uncommitted, generic solar selected on an economic basis. Even as federal tax credits expire, solar remains a cost-effective resource for meeting RPS compliance targets.

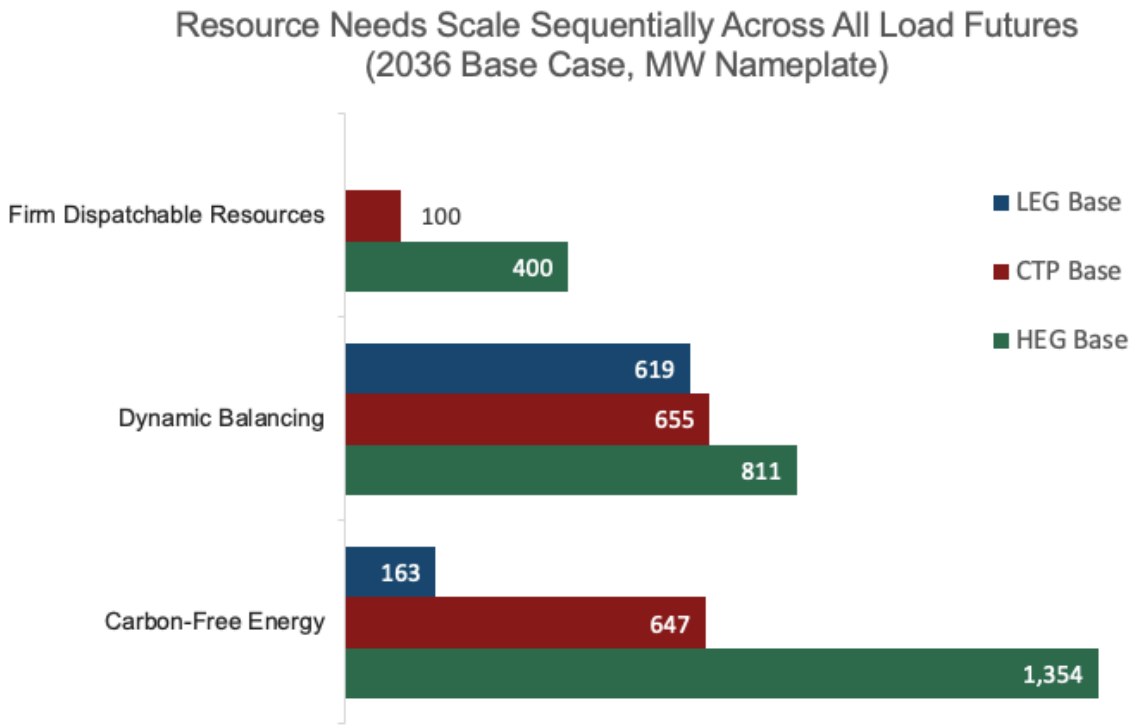
FIGURE 9-23. CTP CORE CASES – RANGE OF SOLAR INSTALLED CAPACITY ADDITIONS



Key Finding 2. Meeting Load Uncertainty Requires a Flexible Procurement Framework

Like utilities nationwide, PNM faces unprecedented load uncertainty and volatility at a time when bringing new generation and transmission online requires multi-year lead times. PNM must proactively manage this uncertainty – hedging against potential demand growth without overcommitting capital. Under the LEG scenario, PNM's existing and committed supply-side resources are sufficient to satisfy system needs through the focus period. Conversely, under the CTP and HEG cases, accelerated demand necessitates incremental supply-side resources within the focus period to maintain grid reliability.

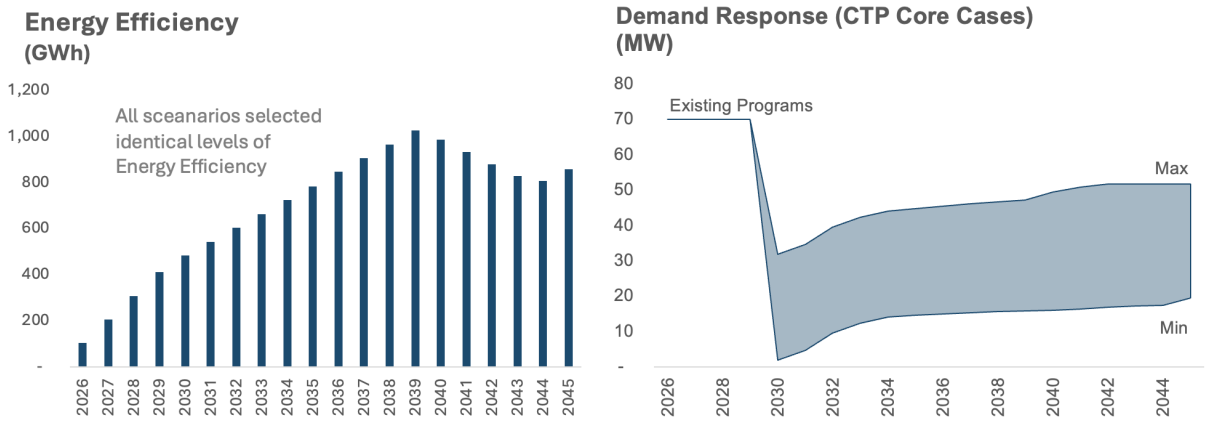
FIGURE 9-24. RESOURCE NEEDS BY RESOURCE TYPE ACROSS FUTURES



Key Finding 3. Demand-Side Resources Expand to Provide Energy and Peak Capacity Reductions

Rather than treating demand-side management as a fixed reduction to the load forecast, DR and EE are modeled as candidate resource options within EnCompass™. This allows demand-side bundles to compete directly on a least-cost basis against supply-side alternatives. Across all CTP scenarios, the model selected maximum achievable levels of energy efficiency and consistently selected DR programs to defer utility-scale peaking buildouts.

FIGURE 9-25. MODELED DEMAND-SIDE MANAGEMENT (DSM) EXPANSION – ENERGY EFFICIENCY AND DEMAND RESPONSE ADDITIONS ACROSS CTP CASES

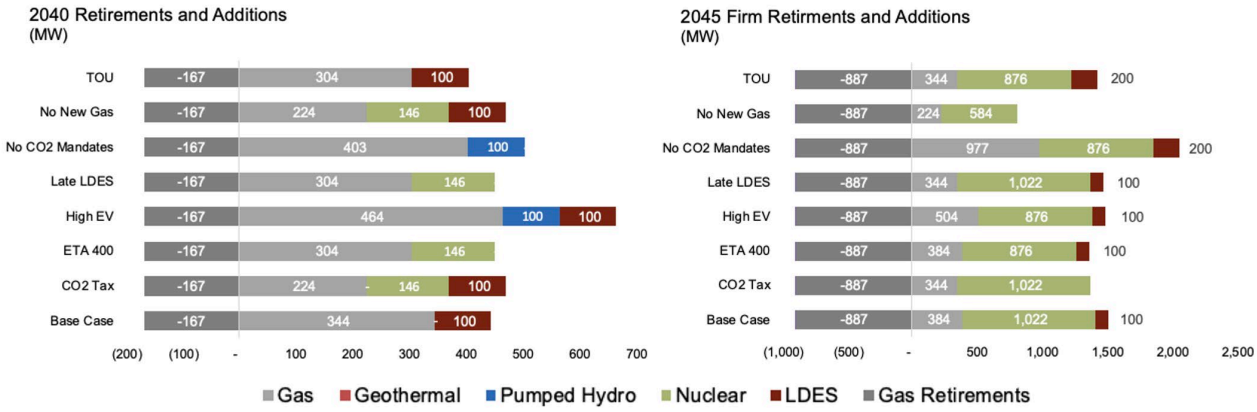


Key Finding 4. Firm, Dispatchable Resources Are Essential for Grid Reliability in a Clean Energy Portfolio

As PNM advances toward a 100% clean energy portfolio, capacity expansion modeling demonstrates a growing structural requirement for carbon-free firm, dispatchable resources. While renewable resources (wind and solar) deliver most of the annual energy generation and daily peak system balancing relies heavily on shifting energy delivery with battery energy storage, firm capacity remains essential to maintain resource adequacy, bridge multi-day renewable lulls, and support system resiliency during periods of extreme weather or grid stress.

- **Through 2035 - 2040:** Across all core scenarios, the model resulting expansion plans adds between 237 MW and 497 MW of new firm, dispatchable capacity, comprising options such as hydrogen-capable gas turbines, geothermal, pumped hydro storage, nuclear, and LDES. Excluding the High EV Forecast sensitivity (which drives higher overall load), the underlying resource need spans a narrow range of 237 MW to 336 MW. This consistency demonstrates that despite variations in technology operating characteristics, the overarching requirement for firm capacity is critical and invariant.
- **Elevated Growth Upside (HEG & XEG):** While the CTP cases establish this baseline, firm capacity requirements accelerate and expand substantially under the HEG and XEG scenarios to maintain reserve margins against higher peak demand.
- **Through 2045:** As existing natural gas capacity retires to comply with New Mexico's ETA mandates, the requirement for firm capacity expands significantly. To replace retiring gas assets while maintaining reliability, the model selects incremental nuclear capacity in all scenarios, complemented by additional LDES in most cases. However, as evaluated further in this section, adjusting market availability and cost assumptions for emerging zero-carbon technologies (e.g., geothermal) alters the specific technology mix without diminishing the total firm capacity required.

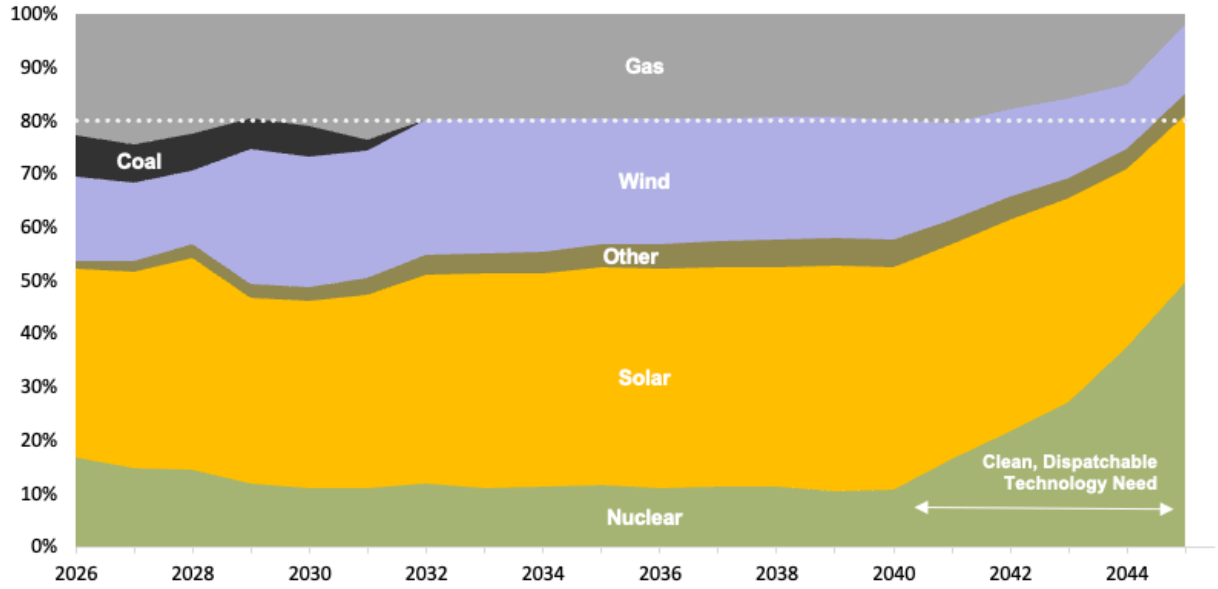
FIGURE 9-26. INCREMENTAL FIRM CAPACITY ADDITIONS 2040 AND 2045 CTP CORE CASES



Key Finding 5. Renewables and Clean Firm Generation Anchor the Energy Transition

Across all evaluated scenarios, carbon-free resources supply approximately 80% of total system energy by the early to mid 2030's, with natural gas meeting the remaining demand. As the portfolio transitions toward New Mexico's 2045 zero-carbon mandate, system adequacy requires emerging technologies such as nuclear generation or enhanced geothermal, complemented by expanding renewable resources and DSM. Under the 2045 zero-carbon requirement, any remaining gas-capable assets (converted to operate on zero-carbon fuels) transition to a targeted, peaker-oriented role, supplying only a minor fraction of total system energy.

FIGURE 9-27. CTP BASE CASE – PROJECTED ENERGY MIX BY TECHNOLOGY (%)



Key Finding 6. Portfolio Economics Are Primary Drivers of Customer Value

System cost screening across the CTP suite demonstrates that achieving an ~80% carbon-free energy platform is cost-effective using proven, commercially mature technologies like solar, wind, and short-duration storage. However, replacing the remaining 10–20% of firm thermal generation to achieve full zero-carbon compliance presents significant cost and operational challenges. Eliminating this final margin without inflating customer costs requires the commercialization and cost decline of emerging clean firm and long-duration technologies (e.g., advanced nuclear, clean fuels, enhanced geothermal, and LDES) that are not yet commercially available at scale today.

Key Finding 7. Expanded Transmission Connectivity Potentially Provides Substantial Net Savings for Customers

Evaluating targeted transmission expansion sensitivities demonstrates that enhancing regional transfer capability can potentially lower system costs. Three of the four transmission scenarios evaluated yield significant customer savings relative to the CTP Base Case by increasing off-peak market sales, reducing renewable curtailments, and optimizing overall portfolio dispatch. The inclusion of the SunZia Connection delivers the largest cost reduction, lowering the 20-year NPV by $504 million. Similarly, the Blackwater Connection to SPP and Rio Sol Connection expansion projects yields net savings of $247 million and $245 million, respectively. Conversely, the Four

Corners transmission expansion increases total NPV by $116 million, indicating that transmission additions must be strategically located to deliver net economic benefits.

TABLE 9-6. 20-YEAR PORTFOLIO NPV AND CUSTOMER NET SAVINGS ACROSS TRANSMISSION SCENARIOS

Scenario Name	20-Year NPV ($ millions)	Delta from CTP Base Case ($ millions)
SunZia Connection	$13,822	($504)
Blackwater Connection to SPP	$14,079	($247)
Rio Sol Connection	$ 14,082	($245)
Four Corners Connection	$14,443	$116

Key Findings Summary

Across the various portfolio results, PNM's system needs are shaped by continued load uncertainty, clean energy policy requirements, and the need to maintain reliability through the transition to a lower-carbon resource mix. Solar remains a foundational and cost-effective resource across all portfolios, supported by additional demand-side resources such as energy efficiency and demand response to reduce energy needs and peak capacity requirements. However, the analysis also shows that renewable generation and short-duration storage alone are not sufficient to maintain reliability, particularly as load growth accelerates and existing natural gas resources retire to meet New Mexico's zero-carbon mandate. As a result, firm, dispatchable, carbon-free resources such as enhanced geothermal, nuclear, hydrogen-capable generation, pumped hydro, and long-duration storage become increasingly important, especially beyond 2040. The results indicate that achieving an approximately 80% carbon-free energy mix is a low-cost path using commercially mature technologies, while reaching full zero-carbon compliance will depend on the availability, cost decline, and scalability of emerging clean firm resources. Targeted transmission expansion may also provide meaningful customer savings by improving regional transfer capability, reducing curtailment, and optimizing portfolio dispatch, although the benefits depend heavily on the location and characteristics of each transmission project.

10. Statement of Need

10.1 Introduction

PNM's 2026 IRP presents a comprehensive and forward-looking strategy to reliably and efficiently serve projected customer demand while achieving compliance with New Mexico's clean energy requirements through 2045. In accordance with 17.7.3.10(A) and (B) NMAC, this IRP establishes a Statement of Need that defines the required operational attributes, such as carbon-free energy, dynamic balancing, and firm dispatchable resources needed to meet evolving system demands. Crucially, the Statement of Need goes beyond peak load forecasts to evaluate drivers like demand growth, decarbonization, and unit retirements, providing a flexible framework rather than a rigid, technology-specific mandate.

The Statement of Need quantities and technical characteristics in this section are supported by the existing-resource information in Appendix E, the load forecast in Appendix H, the candidate-resource assumptions in Appendix K, the reliability analysis in Appendix M, the scenario results in Appendix N, and the selected Most Cost-Effective Portfolio in Appendix O. The quantities shown are planning ranges and do not constitute predetermined procurement awards. Before solicitation, PNM will update the remaining need using the then-current load forecast, the status of approved and pending resources, accredited-capacity requirements, transmission information, and the results of ongoing procurements.

The 2026 IRP base CTP portfolio establishes the foundation for PNM's MCEP, which integrates supply- and demand-side resources in compliance with 17.7.3.7(M) NMAC. To fully satisfy the rule's mandate to balance these economics with comprehensive "reliability and risk considerations," PNM does not treat this baseline as a rigid, singular path. Instead, the baseline serves as the optimized core around which an extensive set of supply, demand, and market sensitivities were evaluated. This ensures that the resulting tiered procurement framework remains robust, cost-effective, and adaptable across a wide range of real-world risk scenarios.

In developing the Statement of Need and Action Plan, PNM provided diagrams of the procurement IRP timeline and procurement timeframes which show the planning time horizons for the 2026 IRP in the context of both the previous 2023 and subsequent 2029 IRPs. These diagrams can be found in Appendix P. Also, the discussion of PNM's MCEP can be found in Section 9.4 which provides the background for the tier procurement framework discussed in this section.

10.2 Capacity and Energy Shortfall

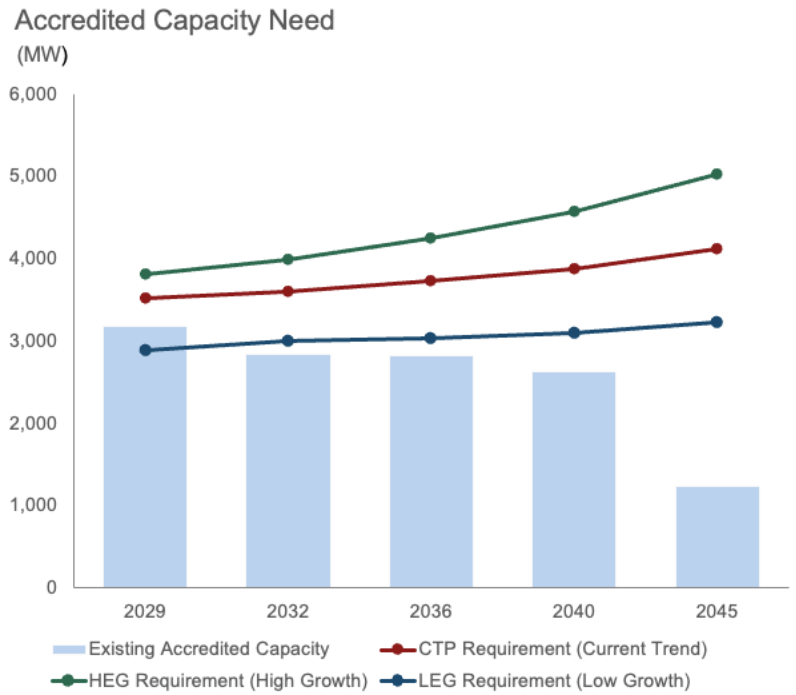
To establish a baseline for the system's resource needs, PNM first evaluates a "no-action" scenario. This analysis measures the gap between projected system needs and existing or already approved capacity and energy before adding any new resources. It explicitly excludes future generic candidate resource options, projects pending approval in the 2029–2032 resource filing, and procurement from the RFP Supplement. The resulting resource gap is driven by two factors: projected load growth and the scheduled retirement or contractual expiration of existing generation. The resource details used for the gap analysis are provided in Section 4.

10.2.1 Accredited Capacity & Energy Position Across Futures

The magnitude and timing of the system's future capacity deficit depend heavily on the trajectory of regional economic growth and electrification. Figure 10-1 contrasts existing and approved accredited capacity against the 14.5% PRM requirements across three distinct load growth scenarios: the LEG, CTP, and HEG futures.

The resource adequacy deficit over the 20-year planning horizon is illustrated by the vertical divergence between existing accredited capacity and the target requirement lines. With the exception of the LEG future, current resources fall short of meeting the planning PRM requirement by 2029. By 2045, the compounding impacts of asset retirements and intensifying peak loads expand these capacity deficits significantly (see Section 6.4 for underlying data).

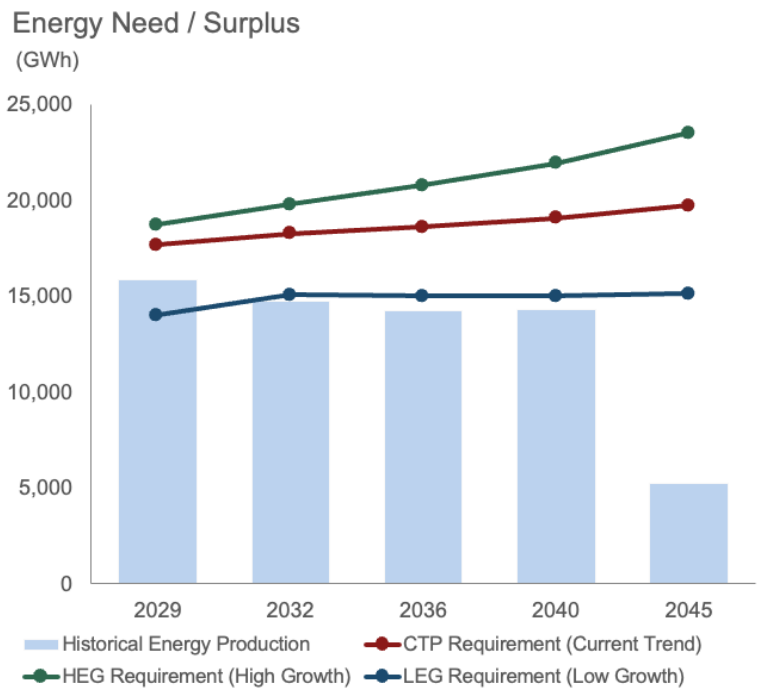
Figure 10-1. Accredited Capacity Need Across Futures



Notes: The IRP analysis included an additional load sensitivity that covered XEG. This is a boundary limit on load growth and expected to be very low probability. The XEG results showed an additional capacity deficit of approximately 1,900 MW above the HEG deficit by 2036 and an additional capacity deficit of approximately 2,500 MW above the HEG deficit by 2045. This is well above the HEG deficiencies shown above in Figure 10-1.

PNM also evaluated the incremental energy requirements to serve PNM retail load. Based on historical output of the existing resources, there is essentially no energy margin by 2036 indicating a significant risk of falling short if resource availability is reduced or dispatch is not perfectly matched to load demand. Two of PNM's existing contracted renewable resources are expected to expire between 2034 to 2036 and are contributing to the reduction in projected energy production by 2036. While energy margins are not specifically targeted in resource planning, a portfolio would be expected to have substantial potential to significantly exceed the energy needs of the system since many resources are not dispatched at full capacity much of the time.

FIGURE 10-2. ENERGY NEED AND SURPLUS ACROSS FUTURES



10.2.2 DYNAMIC TIERED PROCUREMENT FRAMEWORK

To ensure the IRP translates directly into actionable, risk-managed commercial decisions, PNM structures portfolio additions across two dimensions: Vertical Load Scaling (responding to load growth futures) and Horizontal Functional Categories (maintaining technology diversity and operational flexibility).

Vertical Load Scaling

Rather than relying on a single static load forecast, PNM's resource plan employs distinct load futures tied to measurable economic conditions. Each future reflects a specific growth threshold that, when crossed, alters the timing and volume of resource procurement:

- **Current Trends & Policy (Baseline Future - Tier 1):** Serves as the foundational anchor for the 2026 IRP. This reference case reflects baseline trajectories for core planning drivers, such as load growth, customer-sited BTM solar adoption, and EV penetration.
- **Low Economic Growth (LEG Boundary):** Establishes the lower-bound demand trajectory. Under this scenario, PNM's existing fleet and already-committed resource additions are sufficient to maintain system resource adequacy. As a result, this scenario defines a demand floor that requires no incremental procurement tier.
- **High Economic Growth (Tier 2):** Activated when growth parameters outpace reference case expectations across core demand drivers. This scenario evaluates system needs under accelerated economic development, elevated regional load forecasts, and significant adoption rates for both EV and building electrification.

- **Extreme Economic Development (Tier 3):** Represents a low-probability, high-impact demand trajectory triggered by the prospective addition of discrete, large-scale industrial or data center loads. This tier establishes conditional procurement mechanisms that scale capacity additions if specific large-load commitments materialize.

10.3 CTP Future (Base – Tier 1)

The CTP trajectory represents the baseline planning scenarios with the highest expected probability of occurrence. Under this pathway, steady load growth and clean energy mandates mean that the pending near-term procurement resources only partially solve the long-term resource need, requiring additional generic resources over time.

The individual technologies described in detail in Section 8 roll up into the three operational categories in shown Table 10-1 below and used to summarize the Tier 1 Statement of Need, while the highlighted ranges depict how needs vary across modeled sensitivities.

- **Through 2036:** Supply-side resources consist entirely of utility-scale carbon-free resources (i.e., solar) and Demand-side resources focus on the expansion of energy efficiency and demand response programs.
- **Through 2045:** Additional technologies emerge in the later years of the planning horizon, with SMRs adding substantial carbon-free energy and firm capacity to the overall portfolio.

Critically, the resource ranges defined below represent net-new, incremental capacity targets required over and above the pending near-term procurements. Based on the selected technologies from the IRP analysis, Table 10-1 shows the total incremental resource needs. The details supporting the CTP ranges are shown in Section 9.2.

TABLE 10-1. INCREMENTAL RESOURCE NEEDS BASED ON CTP FUTURE AND SENSITIVITIES

Resource Category	Through 2036[a]		Through 2045[a]	
	Low[b] (MW)	High[b] (MW)	Low[b] (MW)	High[b] (MW)
Carbon-Free Energy	556	794	1,565	1,829
Dynamic Balancing	15	45	536	820
Firm Dispatchable	0	200	863	1,602

Notes:

a. Amounts through 2036 and through 2045 do not include existing, approved resources not yet in-service and pending resources not yet approved.

b. The 'Low' and 'High' columns within each individual load scenario do not represent low or high economic growth; rather, they represent the optimization bounds driven by variations in key modeling assumptions within that specific load track.

10.3.1 Stakeholder Scenarios

PNM evaluated a series of alternative modeling cases incorporating stakeholder-requested assumptions and constraints using the same underlying baseline load trajectory as the CTP case, but adjusting critical inputs and assumptions changes the optimized portfolio balance across the three functional technology categories. Specifically, these sensitivities expanded the near-term need for Carbon-Free resources, accelerated the overall demand for Dynamic Balancing resources, and confirmed an almost identical long-term capacity floor for Firm Dispatchable resources. The details supporting stakeholder scenario ranges are shown in Section 9.7.

Key Category Takeaways:

- **Carbon-Free Energy Resources:** Stakeholder assumptions widen the near-term band of uncertainty through 2036, expanding the range of additional resources to 238 MW – 967 MW (compared to the tighter CTP range of 556 MW – 794 MW). By 2045, the long-term range shifts to an additional 1,265 MW – 1,621 MW of installed capacity, bringing the high-end requirement into close alignment with the CTP.
- **Dynamic Balancing Resources:** Altering resource options shifts the need for fast-acting grid flexibility upward across the board. The near-term focus period ceiling increases significantly to 421 MW (vs. 45 MW in the CTP), ultimately scaling to a maximum of up to 835 MW by 2045.
- **Firm Dispatchable Resources:** The absolute volume of firm capacity required to preserve grid stability remains very stable. Through 2036, both pathways share an identical near-term floor of 0 MW, while the upper bounds remain closely aligned at 350 MW under stakeholder assumptions versus 200 MW in the CTP. By 2045, the long-term requirements converge on a similar requirement (1,360 MW under stakeholder cases vs. 1,602 MW in the CTP). However, while the capacity floor is driven by load and retirement timelines, the stakeholder assumptions dramatically shift the underlying technology mix away from traditional placeholders toward alternative clean-firm dispatchable resources (e.g., geothermal).

Planning Triggers

A move to align with this planning pathway could be triggered by changes in ETA goals or required milestone dates, new or modified demand side management programs bid into resource procurements that exceed the expected penetration levels utilized in the analysis, or future RFP bids provide lower technology costs, better operating characteristics, and/or more favorable permitting timeframes over current expectations. Fusion was added per a stakeholder request. It is understood that fusion companies target deployment of the first fusion power plants by the early to mid-2030s; however, a cost and deployment trajectory for this technology in the Focus Period is uncertain at this time.

10.4 Downward Variance Low Economic Growth Future

Sensitivity modeling demonstrates that under a LEG Future, the near-term procurement resources are fully sufficient to meet system needs. Minimal supply-side resource additions are required through 2040, though the model consistently identifies incremental demand-side (EE programs) as optimal cost. Such a planning pathway would be triggered by a significant reduction in the actual load growth captured in the expected CTP cases. The details supporting the LEG range needs are shown in Section 9.5.

TABLE 10-2. INCREMENTAL RESOURCE NEEDS BASED ON LEG FUTURE AND SENSITIVITIES

Resource Category	Through 2036[a]		Through 2045[a]	
	Low[b] (MW)	High[b] (MW)	Low[b] (MW)	High[b] (MW)
Carbon-Free Energy	163	163	1,159	1,263
Dynamic Balancing	9	9	286	384
Firm Dispatchable	0	0	146	624

Notes:

a. Amounts through 2036 and through 2045 do not include existing, approved resources not yet in-service and pending resources not yet approved.

b. The 'Low' and 'High' columns within each individual load scenario do not represent low or high economic growth; rather, they represent the optimization bounds driven by variations in key modeling assumptions within that specific load track.

10.5 Upward Scalability: Tier 2 - High Economic Growth Future

If economic development and electrification growth accelerate beyond the levels defined in the CTP future, PNM's resource needs are expected to be significantly greater.

When compared to the CTP future, there is substantial greater amounts of solar and a wider range of short duration storage through 2036. Greater amounts of long-duration storage are also evident. Linear generators are also added in smaller quantities depending on the sensitivity. Table 10-3 summarizes the resource ranges identified in the IRP analysis for the HEG future. The details supporting the HEG ranges are shown in Section 9.6.

TABLE 10-3. INCREMENTAL RESOURCE NEEDS BASED ON HEG FUTURE AND SENSITIVITIES

Resource Category	Through 2036[a]		Through 2045[a]	
	Low[b] (MW)	High[b] (MW)	Low[b] (MW)	High[b] (MW)
Carbon-Free Energy	1,223	1,398	1,966	2,434
Dynamic Balancing	46	695	676	939
Firm Dispatchable	80	400	1,434	1,862

Notes:

a. Amounts through 2036 and through 2045 do not include existing, approved resources not yet in-service and pending resources not yet approved.

b. The 'Low' and 'High' columns within each individual load scenario do not represent low or high economic growth; rather, they represent the optimization bounds driven by variations in key modeling assumptions within that specific load track.

Planning Triggers

Changes that would lead to adapting to a high economic growth planning pathway would include faster adoption of electrification and electric vehicles than currently forecast. This could come about from regulatory changes focused on accelerating carbon reduction goals. Other drivers of an HEG planning pathway include increased US manufacturing activity and accelerated overall economic growth above current expectations and data center and AI activities that are more moderate than exemplified by current demand but above the expectations of the base CTP forecast.

10.6 Boundary Sensitivity: Tier 3 - Extreme Economic Growth Sensitivity

To evaluate extreme load growth, the Extreme Economic Growth Sensitivity maps out an unprecedented volume of resources required well beyond historical procurement cycles. Based on the technologies selected in the IRP, the incremental resource needs, above the pending near-term procurements, under the Extreme Economic Growth Sensitivity are shown in Table 10-4 below.

TABLE 10-4. INCREMENTAL RESOURCE NEEDS BASED ON EXTREME ECONOMIC GROWTH SENSITIVITY

Resource Category	Through 2036[a] (MW)	Through 2045[a] (MW)
Carbon-Free Energy	5,396	6,405
Dynamic Balancing	2,373	2,379
Firm Dispatchable	1,360	3,622

Notes:

a. Amounts through 2036 and through 2045 do not include existing, approved resources not yet in-service and pending resources not yet approved.

Planning Trigger

The key trigger for a 3 Tier planning pathway would be continued and accelerating Large Customer and Data Center Growth. Contracting and development milestones that ensure the costs of serving new large load would be aligned to protections in a large load tariff to ensure that customers have certainty on rate and service impacts of large load customer service and avoid unfairly shifting costs to other customer classes.

10.7 Conclusion

The 2026 Statement of Need establishes a dynamic, trigger-based procurement framework rather than a static build plan. By organizing system needs into three functional categories, Carbon-Free Energy, Dynamic Balancing, and Firm Dispatchable resources, PNM maintains the operational flexibility required to meet long-term reliability and statutory mandates as market conditions evolve.

Instead of locking into rigid technology quotas, PNM ties future solicitations directly to measurable demand thresholds. The baseline Tier 1 pathway serves as PNM's immediate execution plan for the next RFP cycle, prioritizing near-term carbon-free additions and fast-acting balancing resources to preserve resource adequacy under current trajectories. If electrification, EV adoption, or regional economic development accelerates beyond baseline expectations, the framework seamlessly scales up procurement across all three resource categories under Tier 2. For low-probability, extreme load growth driven by large industrial or data center commitments, Tier 3 provides conditional, large-scale capacity expansion protected by targeted tariff structures. Conversely, if growth falters, a Low Economic Growth floor defers supply-side capital spend in favor of cost-effective demand management.

By anchoring future solicitations to functional operational attributes and real-world planning triggers, PNM can execute near-term procurements with confidence while safeguarding customers against the risks of premature or speculative overbuilding.

11. Action Plan

The 2026 IRP Action Plan establishes the near-term actions PNM will undertake to address the resource needs identified through the integrated resource planning process and advance the transition to a reliable, affordable, resilient, and carbon-free portfolio. Informed by the Statement of Need, supporting analyses, and stakeholder input, the Action Plan provides a practical framework for pursuing necessary resources, evaluating emerging technologies, and refining planning assumptions as conditions evolve. Recognizing the various planning uncertainties, PNM has developed the Action Plan to support timely progress while maintaining sufficient flexibility to adapt to new information and changing system needs.

PNM will implement this Action Plan during the three-year period following filing of the 2026 IRP. The actions identified below describe the specific planning, solicitation, contracting, transmission, demand-side, regulatory, and stakeholder activities PNM will undertake to implement the IRP and fulfill the accepted Statement of Need. PNM will use the same action identifiers in the implementation reports filed one year and two years after the IRP filing and will report completed work, milestones, schedule changes, and unresolved dependencies.

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.
2. PNM will take the necessary steps to advance the 2029-2032 All-Source Generation Resource RFP Supplement issued on May 1, 2026, proceeding with the evaluation and selection of resources to meet 2029-2032 system needs identified in PNM's 2023 IRP.
3. PNM will issue an All-Source RFP seeking both supply-side and demand-side resources to meet its 2033 – 2036 system needs. To the extent issuance cannot occur within five months after Commission acceptance, PNM will seek a variance from 17.7.3.12(B) NMAC. The variance request will identify a definite proposed solicitation date, explain the planning and procurement dependencies supporting the schedule, and demonstrate how the alternative preserves competitive fairness, transparency, and alignment with the accepted Statement of Need. Given the long development timelines for generation and transmission infrastructure, initiating procurement well in advance provides the necessary lead time and could broaden the pool of potential bidders.

   PNM will provide the draft RFP, which will be open to new and revised demand-side management options, for stakeholder review. The RFP draft documents will identify how PNM will evaluate these projects, include accredited capacity, and avoided or deferred system costs that will be assessed.

   Note: PNM must finalize its resource selections from the 2029-2032 All-Source Generation Resource RFP Supplement before issuing a subsequent RFP. Consequently, this dependency, along with the need to solidify other critical inputs and assumptions, such as the load forecast, may require a variance to the IRP procurement schedule.

4. PNM will form a working group to evaluate strategic public and private partnerships, policies and funding mechanisms or tax credits, including new state and federal incentives, to support the deployment of emerging clean energy resource development including fusion and enhanced geothermal and transmission expansion in New Mexico, with the goal of benefiting customers by reducing development risk and managing associated costs.

   A focus of the working group will include identifying potential solutions to challenges of seeking emerging and long-lead technologies under the current RFP processes outlined in the IRP rule.

5. PNM will further analyze the four IRP-evaluated transmission alternatives that would connect PNM's system to neighboring systems: the Rio Sol transmission facilities, the SunZia AC transmission facilities, the SPP system near the existing Blackwater HVDC facility, and the expanded interconnection with neighboring utilities at Four Corners. These analyses will focus on validating the underlying economic findings on customer value and clarify the potential benefits of increased access to external regional markets. Depending on the outcomes of these evaluations, PNM may seek regulatory approval for specific transmission projects. PNM will provide appropriate information justifying the basis for any facilities sought under a regulatory filing. PNM will review projects proposed to WestTEC and suggest if others should also be considered for evaluation. PNM will also assess how moving to flow-based transmission capacity for operations might affect transmission planning, utilization and congestion assessments.

6. PNM is participating in the development of a western regional resource adequacy program for EDAM participants and will assess its potential to enhance reliability and deliver PNM customer value. As a sponsor and active member of the stakeholder working group, PNM will assist in advancing a final resource adequacy proposal for the EDAM/WEIM footprint to the new ROWE Board by the end of Q1 2027 for program development. Based on the final program framework, PNM will evaluate whether there are impacts to its long-term reliability planning metrics that should be incorporated into its next IRP and will report its evaluation in its annual action plan status updates.

7. PNM will continue to support the expansion of demand side options including demand response and energy efficiency initiatives through its triennial Energy Efficiency and Load Management program filings and Grid Modernization Plan development and timelines.

   a. PNM will continue efforts for expanding demand response programs that leverage Grid Modernization AMI technologies. The development timeline is dependent on the deployment of AMI meters and infrastructure. This includes development of specifications for a Behavioral Demand Response Pilot program.

   b. Contingent on a final contract with DOE, PNM will leverage small, distributed energy resources to improve grid reliability and reduce customer electricity bills through its recently awarded DOE VPP grant.

   c. PNM will provide a visual representation of the various demand-side programs and their progression.

d. PNM will continue to advance energy efficiency and demand response initiatives thorough existing and planned pilot programs:

   i. An All-Electric Homes Pilot to encourage all-electric home construction by supporting homes with electric cooking, space heating, and water heating systems through enhanced incentive offerings.

   ii. PNM Manufacturing Facilities Glow-Up Program: Helping qualifying manufacturing customers reduce energy costs by combining tax-saving opportunities with energy-efficiency upgrades.

   iii. PNM Business Uplift Pilot: Supporting small businesses in designated redevelopment areas by providing enhanced incentives for energy-efficient equipment upgrades and facility improvements.

   iv. Low Income Residential Heat Pump Pilot: Promoting the adoption of high-efficiency heat pumps among low-income customers through enhanced rebates and financing options.

   v. PNM will actively recruit customers for the EV Active Managed Charging Pilot Program which was recently initiated.

8. PNM recognizes that IRP stakeholders support opt-out time-of-day rates and will continue to work through the Pricing Advisory Committee (PRAC) on its Roadmap to default TOD rates.

   a. PNM will continue to provide status updates on its roadmap to establish an opt-out TOD rate.

   b. Based on data from the TOD pilot program initiated in 2024, PNM will propose modifications to the pilot program to improve potential benefits to customers.

   c. PNM will propose in a general rate case modifications to the pilot program to add a super off-peak period.

   d. Using data collected from the pilot program, PNM will develop a residential TOD program as the default residential rate with an opt-out provision. The changes will be proposed in a future general rate case following full deployment of AMI. PNM will provide education to the residential customer class to coincide with this roll-out.

   e. PNM will continue to seek stakeholder input on the TOD rate development through the PRAC.

9. PNM will file a Large Load Tariff to establish rates, service conditions, and cost-responsibility provisions applicable to large loads seeking service on PNM's system. The tariff will be designed to support economic development opportunities while protecting existing customers from cost shifting, stranded investment risk, and adverse reliability impacts. PNM will evaluate and incorporate, as appropriate, customer protection mechanisms including minimum load commitments, contract demand obligations, exit provisions, collateral requirements, and infrastructure cost assignment methodologies.

10. PNM will file annual reports to demonstrate the progress of its Action Plan.
11. PNM will complete the 2029 IRP in accordance with 17.7.3 NMAC.

APPENDIX A: ACRONYMS

AAR	Ambient Adjusted Ratings
AC	Alternating Current
ACCC	Advanced conductor
ADMS	Advanced Distribution Management Systems
AFC	Available Flowgate Capacity
AMI	Advanced Metering Infrastructure
APS	Arizona Public Service Company
ATB	Annual Technologies Baseline
ATC	Available Transfer Capability
BA	Balancing Area
BAA	Balancing Authority Area
BESS	Battery Energy Storage System
BTM	Behind-The-Meter
CAES	Compressed Air Energy Storage
CAGR	Compound Annual Growth Rate
CAIDI	Customer Average Interruption Frequency Index
CAISO	California Independent System Operator
CAPEX	Capital Expenditures
CAPS	Corrective Action Plans
CC	Combined Cycle
CCN	Certificate of Public Convenience & Necessity
CCS	Carbon Capture and Storage
CS	Community Solar
CT	Combustion Turbines
CTP	Current Trends and Policy
DC	Direct Current
DCU	Digital Control Unit
DER	Distributed Energy Resources
DG	Distributed Generation
DLC	Direct Load Control
DR	Demand Response
DSM	Demand Side Management
DSP	Distribution System Plan
E3	Energy and Environmental Economics, Inc.
EDAM	Extended Day-Ahead Market
EE	Energy Efficiency
EIP	Eastern Interconnect Project
ELCC	Effective Load Carrying Capacity
EPE	El Paso Electric Company
EPRI	Electric Resource Power Institute
ERCOT	Electric Reliability Council of Texas
ESA	Energy Storage Agreement
ESIG	Energy Systems Integration Group
ETA	Energy Transition Act
EUE	Expected Unserved Energy
EUEA	Efficient Use of Energy Act
FACTS	Flexible AC Transmission Systems
FCPP	Four Corners Power Plant
FEOC	Foreign Entity of Concern
FERC	Federal Energy Regulatory Commission
FSP	Facilitated Stakeholder Process
GET	Grid Enhancing Technology
GHG	Greenhouse Gas
GIA	Generator Interconnection Agreement
GWh	Gigawatt-hours
HB	House Bill
HEG	High Economic Growth
HVAC	Heating, Ventilation and Air Conditioning
HVDC	High-Voltage Direct Current
IAS	Iron-Air Storage
IBR	Inverter Based Resource
ICAP	Installed Capacity
ICF	Inner City Fund/ICF International
IEEE	Institute of Electrical and Electronics Engineers
ILR	inverter loading ratio
IM	Independent Monitor
IRA	Inflation Reduction Act
IRP	Integrated Resource Plan
ISO	Independent System Operators
ISP	Integrated System Plan
ITC	Investment Tax Credit
kV	Kilovolt
LBNL	Lawrence Berkeley National Laboratory
LCOE	Levelized Cost of Energy
LDES	Long-Duration Energy Storage
LED	Light Emitting Diode
LEG	Low Economic Growth
LGIA	Large Generator Interconnection Agreement
LGIP	Large Generator Interconnection Procedures
LM	Load Management
LOLE	loss of load expectation
LOLH	Loss-of-Load-Hours
LOLP	Loss of Load Probability
LTCE	Long Term Capacity Expansion
M+	Markets Plus
MCEP	Most Cost-Effective Portfolio
MOD	Modeling, Data, and Analysis NERC standards
MV90	Interval meter data collection system/model designation
MWh	Megawatt-hours

NAESB	North American Standards Board
NEPA	National Environmental Policy Act
NERC	North American Electric Reliability Corporation
NLR	National Laboratory of the Rockies
NMAC	New Mexico Administrative Code
NMPRC	New Mexico Public Regulation Commission
NMSA	New Mexico Statutes Annotated
NMWEC	New Mexico Wind Energy Center
NO_x	Nitrogen Oxides
NPV	Net Present Value of Revenue Requirements
O&M	Operating and Maintenance
OATT	Open Access Transmission Tariff
OBBBA	One Big Beautiful Bill Act
PCM	Production Cost Modeling
PEGS	Prewitt Escalante Generating Station
PHS	Pumped Hydro Storage
PNM	Public Service Company of New Mexico
PPA	Power Purchase Agreement
PRAC	Pricing Advisory Committee
PRC	Protection and Control NERC Standards family
PRM	Planning Reserve Margin
PSH	Pumped Storage Hydro
PST	Phase Shifting Transformer
PTC	Production Tax Credit
PV	photovoltaic
PVNGS	Palo Verde Nuclear Generating Station
PVRR	Present Value Revenue Requirement
RA	Resource Adequacy
RAS	Remedial Action Schemes
RCCS	Albuquerque power factor control system
RECs	Renewable Energy Certificates
RETA	Renewable Energy Transmission Authority
RFI	Request for Information
RFP	Request for Proposal
ROWE	Regional Organization for Western Energy
RPS	Renewables Portfolio Standard
RSG	Reserve Sharing Group
RTCA	Real-Time Contingency Analysis
RTO	Regional Transmission Organizations
SA	Supplemental Analysis
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SB	Senate Bill
SCADA	Supervisory Control and Data Acquisition
SERVM	Strategic Energy & Risk Valuation Model
SJGS	San Juan Generating Station
SMR	Small Modular Reactor
SO_2	Sulfur Dioxides
SO_x	Sulfur Oxides
SPP	Southwest Power Pool
SPS	Southwestern Public Service
SVC	Static Var Compensator
SWPG	SouthWestern Power Group
SWRA	Southwest Resource Adequacy Study
T&D	Transmission and Distribution Systems
TAG	Technical Assessment Guide
TEP	Transportation Electrification Plan
TOD	Time-of-Day
TOU	Time-of-Use
TPL	Transmission Planning Standard
TSGT	Tri-State Generation & Transmission
TTC	Total Transfer Capability
TWTC	Western Transmission Consortium
UCAP	Unforced Capacity
VEF	Valencia Energy Facility
VPP	Virtual Power Plant
VSC	Voltage Source Converter
WAPA	Western Area Power Administration
WECC	Western Electricity Coordinating Council
WEIM	Western Energy Imbalance Market
WEIS	Western Energy Imbalance Service
WHEV	Whole House Electric Vehicle
WPP	Western Power Pool
WRAP	Western Resource Adequacy Program
XEG	Extreme Economic Growth

APPENDIX B: GLOSSARY OF TERMS

The following terms and acronyms are used throughout this report. Entries are listed alphabetically by full term, with the corresponding acronym shown in parentheses where one is used.

A

Accredited Capacity: The amount of capacity that each generation resource contributes to meeting PNM's planning reserve margin requirement. This is typically less than a generator's nameplate capacity to reflect the various limitations and constraints on each resource that may impact its ability to generate when needed. See also unforced capacity and effective load carrying capability.

ACE Diversity Interchange: Power system control areas within three major (and essentially separate) areas of North America are interconnected electrically, thus enjoying vastly improved reliability and economy of operation compared to operating in isolation. Each must continually balance load, interchange, and generation to minimize adverse influence on neighboring control areas and interconnection frequency. Area control error (ACE) and area diversity interchange (ADI) offer a means of reducing this control burden without undue investment or sacrifice by any participant in a group. (Source: IEEE, http://ieeexplore.ieee.org/Xplore/login.jsp?url=/iel1/59/8797/00387953.pdf?arnumber=387953)

Action Plan Period: The three-year period immediately following IRP filing during which PNM executes near-term implementation activities identified in the Action Plan.

Advanced Conductor (ACCC): High-capacity transmission conductor designs that increase line thermal capability and reduce losses relative to conventional conductors, often used to reconductor existing corridors.

Advanced Distribution Management Systems (ADMS): Integrated software platforms used to monitor, control, and optimize distribution system operations, including outage management, switching, and voltage control.

Advanced Metering Infrastructure (AMI): Networked metering systems that provide two-way communication and interval consumption data between customer meters and the utility.

Aeroderivative: A type of gas turbine used for electrical power generation.

Arizona Public Service Company (APS): The largest electric utility in Arizona and a regional interconnected neighbor and joint-participant with PNM in several generating and transmission facilities.

Availability Factor: The ratio of the time a generating facility is available to produce energy at its rated capacity to the total amount of time in the period being measured, as defined by the IRP Rule.

Available Flowgate Capability (AFC): The remaining transfer capability of a defined flowgate that is available for additional commercial transmission service.

Available Transfer Capability (ATC): The transfer capability remaining in the physical transmission network for further commercial activity, above already committed uses.

Avoided Costs: The incremental cost to a utility for capacity and/or energy that could be avoided if another incremental resource addition such as energy efficiency were added that deferred or eliminated the need for the original addition.

B

Balancing Authority (BA): The entity responsible for balancing generation, load, and interchange within its defined electrical boundary in real time.

Balancing Authority Area (BAA): The collection of generation, transmission, and load within the metered boundaries of a Balancing Authority.

Baseload: A resource that is most economically used by running at a capacity factor of 65% or greater on an annual basis. See also capacity factor.

Battery Energy Storage System (BESS): An electrochemical storage resource that charges and discharges electricity to provide energy, capacity, and ancillary services.

Behind-The-Meter (BTM): Any electricity generation, storage, or energy management system located on the customer's side of the utility revenue meter — meaning the energy produced or stored is consumed on-site and never passes through (or is measured by) the utility's meter before reaching the customer's load.

Biomass Resource: As defined by the IRP Rule, a recognized renewable resource type that uses renewable fuels such as agriculture or animal waste, small diameter timber, salt cedar and other phreatophyte or woody vegetation removed from river basins or watersheds, landfill gas, and anaerobically digested waste biomass. See also renewable energy.

C

California Independent System Operator (CAISO): The independent system operator managing the bulk transmission grid and wholesale markets for most of California, and the operator of the Western Energy Imbalance Market and EDAM.

Cap and Trade: A regulatory body sets a cap on emissions of a designated pollutant and sells permits equivalent to a firm's emissions. Firms that need to increase their emission permits must buy them from those who require fewer permits.

Capacity Factor: Actual energy generated over a certain time period divided by theoretical ability to generate electricity over that same time period. Capacity factor is most often referenced as an annual calculation.

Capacity Uprate: The maximum power level at which a nuclear power plant may operate.

Capital Expenditures (CapEx): Funds a company spends to acquire, upgrade, construct, or maintain long-term physical assets—such as buildings, equipment, machinery, land, or infrastructure—that provide value over multiple years rather than being consumed within a single accounting period.

Carbon Capture and Sequestration (CCS): A technology that allows for carbon dioxide to be captured during the combustion of fossil fuels and subsequently stored in underground geologic formations, reducing and/or eliminating greenhouse gas emissions resulting from fossil fuel combustion.

Carbon Dioxide (CO2): An important greenhouse gas because it is thought to contribute to global warming. An NMPRC Order in Case No. 06-00448-UT requires that electric utilities use standardized prices for carbon emissions in their IRP filing of $8, $20, and $40 per metric ton for their low, medium, and high price sensitivities, respectively.

Certificate of Public Convenience and Necessity (CCN): NMPRC authorization required for a utility to construct or own certain new generation or infrastructure.

Climate Change: A significant change in measures of climate, including temperature, precipitation, or wind, that lasts for an extended period of time, resulting from natural factors or human activities that change the atmosphere's composition and the land surface.

Combined Cycle (CC): A thermal generating configuration in which combustion turbine exhaust heat is recovered to drive a steam turbine, improving overall efficiency.

Combined Cycle Gas Turbine: For electric generation, combined cycle refers to a gas turbine that generates electricity and heat in the exhaust used to make steam, which then drives a steam turbine to generate additional electricity.

Combined Cycle with Carbon Capture and Sequestration (CC-CCS): A combined-cycle generating unit equipped with post-combustion carbon capture and geologic sequestration of the captured carbon dioxide.

Combustion Turbine (CT): A gas-fired generating unit that produces electricity directly from expanding combustion gases, typically used for peaking and flexible operation.

Compound Annual Growth Rate (CAGR): The constant annual rate at which a quantity would need to grow to move from its beginning value to its ending value over a period.

Compressed Air Energy Storage (CAES): A form of energy storage that uses surplus electricity to compress air to a high pressure; air is subsequently stored in subterranean geologic formations and can later be withdrawn to power an electric turbine. Because of the requirement for specific geologic formations, CAES is highly site-specific but can provide durations of 24 hours or longer depending on site characteristics.

Constrained Transmission: A transmission system that can no longer accommodate additional capacity to meet demand is constrained.

Conventional Resources: Coal, nuclear, and natural gas resources that have historically been the most commonly used to supply electricity (also referred to as traditional resources).

Cost Causation: The ratemaking principle that utility costs should be assigned to the customers or customer classes whose energy usage, peak demand characteristics, service requirements, or other behaviors create the need for those costs, thereby promoting equitable and economically efficient rates.

Crediting: A billing mechanism that credits distributed generation system owners for electricity they add to the grid. When a home or business is net-metered, electricity generated is credited against electricity consumed when use exceeds the system's output. Customers are only billed for their "net" energy use.

Current Trends and Policy (CTP): The planning future that reflects presently enacted policy and expected market and technology trends, used as the reference case in the analysis.

Customer Average Interruption Duration Index (CAIDI): A reliability metric representing the average outage duration experienced by customers who were interrupted during a reporting period.

D

Demand: Usage at a point in time, measured in MW or kW.

Demand Response (DR): A resource comprising programs that compensate electricity users in exchange for the ability to interrupt or reduce their electric consumption when system demand is particularly high and/or system reliability is at risk.

Demand Side Management (DSM): The portfolio of energy efficiency, load management, and demand response programs used to modify the level and shape of customer demand.

Demand-Side Resources: As defined by the IRP Rule, energy efficiency and load management, as those terms are defined in the Efficient Use of Energy Act.

Direct Load Control (DLC): A demand-side program in which the utility or its agent directly cycles or curtails customer end-use equipment during system peaks or events.

Dispatchability: The ability of a generating unit to increase or decrease generation, or to be brought online or shut down at the request of a utility's system operator.

Distributed Energy Resources (DER): Smaller-scale generation, storage, and controllable load resources connected at the distribution level or behind the customer meter.

Distributed Generation: Electric generation that is sited at a customer's premises, providing energy to the customer load at that site and/or providing electric energy for use by multiple customers in contiguous distribution substation areas.

Distribution System Plan (DSP): The forward-looking plan describing distribution system needs, investments, and DER integration, filed with the Commission and coordinated with the IRP.

Duty Cycle: Generating facility design that determines how a facility is operated. Duty cycle classifications for firm resources include baseload, intermediate, and peaking; non-firm resources are generally classified as intermittent or storage.

Dynamic Balancing Resources: Resources that provide operators the tools to balance the supply and demand for electricity on an instantaneous basis, recognizing that the generation profiles of many of PNM's carbon-free resources will not coincide naturally with electricity demand. Examples include shorter-duration energy storage, aeroderivative combustion turbines, and demand response.

E

Eastern Interconnect Project (EIP): The transmission project and associated facilities providing an interconnection between the Eastern and Western Interconnections in eastern New Mexico.

Effective Load Carrying Capability (ELCC): A statistical measure used to translate the contributions of non-firm resources toward resource adequacy into equivalent "perfect" capacity, derived through loss of load probability modeling. The use of ELCC allows the planning reserve margin requirement to capture system needs across all conditions.

Efficient Use of Energy Act (EUEA): New Mexico statute requiring utilities to invest a minimum percentage of retail sales revenue in energy efficiency and load management programs.

El Paso Electric Company (EPE): An investor-owned electric utility serving west Texas and southern New Mexico and a neighboring interconnected system to PNM.

Electric Power Research Institute (EPRI): An independent, nonprofit research organization that conducts research and development on electricity generation, delivery, and use.

Electric Reliability Council of Texas (ERCOT): The independent system operator and grid operator for most of Texas, comprising a separate interconnection from the Western and Eastern Interconnections.

Electric Vehicle (EV): A vehicle propelled wholly or partly by electricity drawn from onboard batteries charged from the grid.

Electric Vehicle Time-of-Day (EV-TOD): A rate design that varies the price of electricity used for vehicle charging by time period to shift charging away from system peaks.

Electrolysis: A process by which electricity is used to split water molecules into hydrogen and oxygen; the hydrogen can subsequently be used to generate electricity in thermal generators or fuel cells or used for other applications.

Emergency Energy: Energy purchases to meet unserved load.

EnCompass: The primary resource portfolio modeling software that PNM uses for resource plan optimization. The model includes both capacity expansion and production simulation functionality.

Energy: Usage over a period of time, measured in GWh, MWh, or kWh.

Energy and Environmental Economics, Inc. (E3): An energy consulting firm providing resource adequacy, capacity value, and electric-sector modeling and analysis.

Energy Efficiency (EE): Measures, including energy conservation measures or programs that target consumer behavior, equipment, or devices, that result in a decrease in consumption of electricity without reducing the amount or quality of energy services, as defined by the IRP Rule.

Energy Efficiency Rule (EE Rule): Energy Efficiency Rule, 17.7.2 New Mexico Administrative Code.

Energy Storage: Various technologies that allow for the storage of surplus electricity so that it can later be provided back to the grid. See also compressed air energy storage, flow battery, iron-air storage, liquid air energy storage, lithium-ion battery, and pumped hydro storage.

Energy Storage Agreement (ESA): A contractual agreement between two parties (often a utility and a developer) through which the utility assumes the rights to the output produced by a specific energy storage resource.

Energy Systems Integration Group (ESIG): A nonprofit educational and technical association focused on the integration of variable and distributed resources into power systems.

Energy Transition Act (ETA): 2019 New Mexico legislation establishing carbon-free generation milestones, RPS targets, and the 2045 100% carbon-free requirement for electric utilities.

Equivalent Availability Factor (EAF): The proportion of hours in a given time period that a resource is available to generate at full capacity.

Expected Unserved Energy (EUE): A probabilistic measure of the amount of load shed that a portfolio of resources might experience, as measured in the expected amount of load that cannot be served. See also resource adequacy, loss of load expectation, and loss of load hours.

Extended Day-Ahead Market (EDAM): A voluntary day-ahead wholesale market offered by CAISO that extends day-ahead unit commitment and transfer optimization across participating Western balancing authorities.

Extreme Economic Growth (XEG): A planning scenario reflecting very high load growth driven by large economic development additions such as data centers and manufacturing.

F

Facilitated Stakeholder Process (FSP): A structured, third-party facilitated engagement process used to gather and incorporate stakeholder input into the planning process.

Federal Energy Regulatory Commission (FERC): Federal agency that regulates interstate transmission and wholesale electricity markets and approves NERC reliability standards.

Financial Risk: Expected cost to the customer and the variability and uncertainty of future cost outcomes.

Firm Generating Resources: Generating resources capable of producing stable, predictable output over sustained periods of time (absent forced outages), which typically include nuclear, coal, and natural gas and may in the future include hydrogen and various long-duration storage technologies.

Fixed Cost: Costs that are independent of output. See also variable costs.

Flexible AC Transmission Systems (FACTS): Power-electronic devices that dynamically control voltage, impedance, or phase angle to increase transfer capability and controllability of AC transmission.

Flow Battery: A form of chemical storage that can be used to store surplus electricity and discharge back to the grid. Flow batteries are anticipated to provide storage duration in the range of 8–10 hours.

Focus Period: A look-ahead window representing the target in-service timeframe for resources solicited under the current Action Plan's RFP.

Forced Outage Rate: Percentage of time a unit is not operational when it is expected to be in service.

Foreign Entity of Concern (FEOC): A statutory designation restricting eligibility for federal tax credits and incentives where specified foreign ownership, control, or supply relationships exist.

Four Corners Power Plant (FCPP): A coal-fired generating station in northwestern New Mexico in which PNM holds an ownership interest.

G

Generator Interconnection Agreement (GIA): The contract establishing the terms, facilities, and cost responsibility for connecting a generating facility to the transmission system.

Geothermal: Electric generation fueled by heat from geologic formations, which qualifies as a renewable resource under 17.9.572 NMAC.

Greenhouse Gas (GHG): Atmospheric gases such as carbon dioxide and methane that trap heat and are tracked as emissions in resource planning.

Grid Modernization Statute (Section 62-8-13 PUA): 2020 New Mexico law encouraging utility investment in grid modernization projects, including AMI, that benefit customers and the state.

Grid-Enhancing Technologies (GETs): Hardware and software solutions such as dynamic line ratings, power flow control, and topology optimization that increase utilization of existing transmission.

H

Heat Rate: The ratio of energy inputs used by a generating facility expressed in BTUs (British Thermal Units) to the energy output of that facility expressed in kilowatt-hours, as defined by the IRP Rule.

High Economic Growth (HEG): A planning scenario assuming stronger-than-expected economic and load growth relative to the reference forecast.

High-Voltage Direct Current (HVDC): A transmission technology that converts AC to DC for long-distance or asynchronous transfers, providing controllable power flow.

House Bill (HB): Proposed legislation originating in the House of Representatives of the state legislature or Congress.

House Bill 93 (HB 93): New Mexico legislation requiring advanced grid technology plans, enabling cost recovery for grid modernization projects, and authorizing self-sourced microgrids.

Hydrogen: A carbon-free fuel that may be used to generate electricity through either combustion in a thermal resource or use in a fuel cell. While direct use of hydrogen to generate electricity does not produce carbon emissions, the fuel may have implied emissions embedded in it depending on how it was produced.

Hydrogen-Ready Combustion Turbine: A peaking resource that generates electricity through combustion of a blend of hydrogen and natural gas and that may be retrofit in the future to operate using 100% hydrogen fuel.

I

ICF International (ICF): A global consulting firm providing energy market, load forecasting, and regulatory analysis services.

Independent Monitor (IM): A third party retained to oversee a competitive procurement or planning process and report on its fairness and objectivity.

Independent Power Producer (IPP): Third-party producers who sell capacity and/or energy to utilities.

Independent System Operator (ISO): An independent entity that operates the transmission grid and administers wholesale markets on a nondiscriminatory basis.

Inflation Reduction Act (IRA): Federal legislation passed in 2022 that created broad tax credits and other financial incentives to support the development of clean energy resources.

Infrastructure Investment and Jobs Act (IIJA): Federal legislation providing funding to the energy sector in support of industrial development, complementing the Inflation Reduction Act.

Installed Capacity (ICAP): A legacy capacity-accounting convention counting resources at full nameplate or seasonal rating, with unavailability embedded in the reserve margin.

Institute of Electrical and Electronics Engineers (IEEE): A professional association that develops widely used technical standards for electric power equipment, reliability metrics, and interconnection.

Integrated Resource Plan (IRP): The long-range plan evaluating supply-side and demand-side resource portfolios to meet forecasted customer needs at least cost and acceptable risk.

Integrated System Planning (ISP): A coordinated process in which a utility develops a single long-term plan that links together the different elements of its system, which may include generation, transmission, distribution, and customer programs.

Intermediate: A resource that is most economically run at capacity factors between 20% and 65% on an annual basis. See also capacity factor and duty cycle.

Inverter-Based Resource (IBR): A generating or storage resource that connects to the grid through power electronic inverters, such as solar, wind, and batteries.

Investment Tax Credit (ITC): A federal tax credit based on the capital cost of an eligible generating or storage facility.

Iron-Air Energy Storage: A form of energy storage that utilizes the natural rusting process to store electricity. Iron-air storage is a long-duration storage technology that typically has a duration of 100 hours.

IRP Rule: Integrated Resource Plan for Electric Utilities, NMPRC Rule 17.7.3 New Mexico Administrative Code (17.7.3 NMAC).

J

Jurisdictional Load: Case 3137 Stipulation identifies jurisdictional load as New Mexico retail load and wholesale firm requirement customers contracted prior to September 2, 2002.

L

Large Generator Interconnection Agreement (LGIA): The FERC pro forma agreement governing interconnection of generating facilities larger than 20 MW.

Large Generator Interconnection Procedures (LGIP): The FERC pro forma procedures governing study, queuing, and cost allocation for large generator interconnection requests.

Lawrence Berkeley National Laboratory (LBNL): A U.S. Department of Energy national laboratory that publishes widely used research on electricity markets, renewables, and grid planning.

Levelized Cost of Energy (LCOE): The constant per-unit cost of energy that recovers all lifecycle capital and operating costs of a resource on a present-value basis.

Linear Generator: A type of thermal generating resource that uses combustion of various fuels to drive the oscillation of copper coils attached to magnets; the back-and-forth motion of the

magnets produces electricity. Linear generators are expected to be capable of operating using multiple fuels.

Liquid Air Energy Storage (LAES): A form of energy storage that uses surplus electricity to chill air to very low temperatures so that it can be stored in liquid phase and subsequently depressurized to power an electric turbine. LAES is expected to provide storage duration of approximately 8–10 hours.

Lithium-Ion Battery: A form of chemical storage that can be used to store surplus electricity and discharge back to the grid. Lithium-ion batteries are typically configured to provide storage with duration up to four hours.

Load and Resources: A load and resources table shows the annual balance between load and the resources to meet the load, and includes the reserve margin calculation.

Load Factor: Peak demand divided by average demand.

Load Forecasting: The prediction of the demand for electricity over the planning period for the utility, as defined by the IRP Rule.

Load Management (LM): Measures or programs that target equipment or devices to decrease peak electricity demand or shift demand from peak to off-peak periods, as defined by the IRP Rule.

Load-Following Resource: A resource with a response rate that can meet normal fluctuations in load.

Long-Duration Energy Storage (LDES): Storage technologies capable of sustained discharge over many hours or days, used to address extended periods of low renewable output.

Long-Term Capacity Expansion (LTCE): The optimization modeling that selects the least-cost mix and timing of new resources over the long-range planning horizon.

Loss of Load Expectation (LOLE): A probabilistic measure of the expected frequency that a portfolio of resources would have insufficient capability to serve loads, as measured in expected number of days per year. See also resource adequacy, expected unserved energy, and loss of load hours.

Loss of Load Hours (LOLH): A probabilistic measure of the amount of time that a portfolio of resources would have insufficient capability to serve loads, as measured in expected number of hours per year. See also resource adequacy, loss of load expectation, and expected unserved energy.

Loss of Load Probability (LOLP): The probability that available generating resources will be insufficient to serve load in a given period.

Low Economic Growth (LEG): A planning scenario assuming weaker-than-expected economic and load growth relative to the reference forecast.

Low-Cost Carbon-Free Energy Resources: Resources with the capability to produce clean energy to meet a majority of customers' energy needs throughout the year. Examples available today include solar PV, wind, and energy efficiency.

M

Marginal Cost: The highest system resource cost for the hour.

Markets Plus (M+): The day-ahead and real-time wholesale market service offered by the Southwest Power Pool for participants in the Western Interconnection.

Modeling, Data, and Analysis (MOD): The NERC Reliability Standards family governing transmission modeling data, transfer capability methodology, and data reporting.

Monte Carlo: Risk analysis technique utilizing multiple iterations calculated using random draws for sensitivity variables from a defined distribution for the variables.

Most Cost-Effective Portfolio (MCEP): The resource portfolio identified through the planning analysis as meeting requirements at the lowest reasonable cost and risk.

Most Cost-Effective Resource Portfolio: Those supply-side and demand-side resources that minimize the net present value of revenue requirements proposed by the utility to meet electric system demand during the planning period consistent with reliability and risk considerations, as defined by the IRP Rule.

MV-90 Interval Data System (MV90): The interval meter data collection and translation system used to retrieve and process recorded load data.

N

Nameplate Capacity: The rated output of an electrical generator; it can also refer to the rated capacity of a power plant (also referred to as installed capacity).

National Environmental Policy Act (NEPA): The federal statute requiring environmental review of major federal actions, including permitting of transmission and generation facilities on federal land.

National Laboratory of the Rockies (NLR): A research institution referenced in the analysis as a source of technical study work.

Net Present Value: The difference between the present value of cash inflows and the present value of cash outflows.

Net Present Value of Revenue Requirements (NPV): The present value of the stream of costs that customers would pay over the study period, used to compare portfolios on a consistent basis.

Network Transmission Service: The transmission of capacity and energy from network generating resources to PNM's load.

New Mexico Administrative Code (NMAC): The compilation of adopted rules of New Mexico state agencies, including the rules of the New Mexico Public Regulation Commission.

New Mexico Public Regulation Commission (NMPRC): The state agency that reviews, accepts, and regulates PNM's IRP, rate cases, and resource applications.

New Mexico Statutes Annotated (NMSA): The official compilation of New Mexico statutory law.

New Mexico Wind Energy Center (NMWEC): A wind generating facility in eastern New Mexico from which PNM procures energy.

Non-Firm Resources: Generating resources with limitations on their ability to produce sustained, constant production of energy, including wind and solar (whose intermittency and variability limit their production) and storage and demand response (whose limited duration affects their ability to produce power for sustained periods).

Non-Spinning Reserves: The extra generating capacity that is not currently synchronized with the system but can become available after a short delay.

North American Electric Reliability Corporation (NERC): The FERC-certified Electric Reliability Organization that develops and enforces mandatory Bulk Electric System reliability standards.

North American Energy Standards Board (NAESB): The industry body that develops voluntary wholesale and retail business practice standards for the electricity and natural gas industries.

O

One Big Beautiful Bill Act (OBBBA): Federal legislation that accelerates the phase-out of clean energy tax credits established under the IRA and imposes new Foreign Entity of Concern (FEOC) restrictions.

Open Access Transmission Tariff (OATT): The FERC pro forma tariff under which PNM provides non-discriminatory transmission service to retail and wholesale customers.

Operating and Maintenance (O&M): The recurring non-fuel costs of operating, maintaining, and servicing generating and delivery facilities.

P

Palo Verde Nuclear Generating Station (PVNGS): The nuclear generating station in Arizona in which PNM holds an ownership and leasehold interest.

Particulate Matter: A complex mix of extremely small particles and liquid droplets, including acids, organic chemicals, metals, and soil and dust, creating particle pollution.

Peak Demand: Occurs when demand for energy is at its greatest.

Peak Shaving: A strategy used to reduce electricity use during times of peak demand, typically employed through demand response programs.

Peaking: A resource that is most economically run at a capacity factor of less than 20%. See also capacity factor and duty cycle.

Phase Shifting Transformer (PST): A transformer that adjusts phase angle across a transmission path to control real power flow between parallel paths.

Photovoltaic (PV): Solar generating technology that converts sunlight directly into electricity using semiconductor cells.

Planning Period: The future period for which a utility develops its IRP. For purposes of the IRP Rule, the planning period is 20 years.

Planning Reserve Margin (PRM): A measure of the amount of capacity in a portfolio in excess of a utility's peak demand. The capacity contributions of different resource types are measured using effective load carrying capability (renewables, storage, and demand response) and unforced capacity (nuclear, coal, and gas), allowing the PRM to reflect supply needs across all hours of the year. See also resource adequacy.

Plug-In Hybrids: Hybrid automobiles whose batteries are recharged by plugging into an electric socket.

Point-to-Point Transmission Service: Delivery of power from one location to another, without branching to other locations.

Portfolio: A combination of resource additions and assets over the planning period that meet the reserve margin criteria.

Power Purchase Agreement (PPA): A contractual agreement between two parties (often a utility and a developer) through which the utility assumes the rights to energy and/or capacity provided by a specific generating resource.

Present Value Revenue Requirement (PVRR): A calculation of the cumulative revenue requirement over the planning horizon, discounted to the beginning of the period based on a specified discount rate, typically the utility's weighted average cost of capital.

Prewitt Escalante Generating Station (PEGS): A generating facility in western New Mexico evaluated in PNM's resource portfolios.

Pricing Advisory Committee (PRAC): The advisory group that reviews and provides input on pricing and rate design matters.

Production Cost Modeling (PCM): Chronological simulation of unit commitment and economic dispatch used to estimate production costs, emissions, and system operations.

Production Tax Credit (PTC): A federal tax credit earned per unit of electricity generated by an eligible facility over a defined period.

Protection and Control (PRC): The NERC Reliability Standards family governing protection systems, relay settings, and remedial action schemes.

Public Service Company of New Mexico (PNM): The regulated electric utility serving retail customers across New Mexico and the entity submitting this plan.

Public Utility: As defined by the IRP Rule, public utility or utility has the same meaning as in the Public Utility Act, except that it does not include a distribution cooperative utility, as defined in the Efficient Use of Energy Act.

Pumped Hydro Storage (PHS): A form of mechanical storage that stores electricity by pumping water into a reservoir and subsequently using that water to generate electricity through hydroelectric turbines. Duration varies based on site-specific parameters and hydrologic conditions but can range from short (under 8 hours) to long (100+ hours) depending on reservoir size.

Q

Qualifying Facilities: A class of generating facilities established by FERC that receive special rate and regulatory treatment to support implementation of the Public Utility Regulatory Policies Act of 1978. These facilities fall into two categories: qualifying small power production facilities and qualifying cogeneration facilities.

R

Rate Rider: Under State Statute 62-3-3-H, “rate” means every rate, tariff, charge, or other compensation for utility service rendered or to be rendered by a utility and every rule, regulation, practice, act, requirement, or privilege in any way relating to such rate, tariff, charge, or other compensation and any schedule or tariff or part thereof.

Reactive Compensation and Control System (RCCS): The reactive power compensation and voltage control equipment installed to support the Albuquerque metropolitan load center.

Real-Time Contingency Analysis (RTCA): Continuous operational analysis that evaluates system response to potential contingencies to identify reliability violations before they occur.

Reasonable Cost Threshold: A customer protection mechanism that limits the customer bill impact resulting from renewable energy procurements by utilities. It is the cost level established by the Commission above which a public utility shall not be required to add renewable energy to its electric energy supply portfolio pursuant to the renewable portfolio standard.

Regional Entity: One of the regional organizations with which NERC works to improve the reliability of the bulk power system. Members come from all segments of the electric industry, including investor-owned utilities, federal power agencies, rural electric cooperatives, municipal and provincial utilities, independent power producers, power marketers, and end-use customers.

Regional Haze: Visibility impairment produced by activity that emits fine particles and their precursors over a geographic area.

Regional Organization for Western Energy (ROWE): The independent regional organization formed to govern Western wholesale market services.

Regional Transmission Organization (RTO): A FERC-approved entity that operates transmission facilities and administers markets across a multi-utility region.

Reliability: The ability of the electric system to supply the demand and energy requirements of the customers when needed and to withstand sudden disturbances.

Remedial Action Scheme (RAS): An automatic protection scheme that takes predetermined corrective action following specified system conditions to maintain reliability.

Renewable Energy: As defined by the IRP Rule, electrical energy generated by means of a low- or zero-emissions generation technology with substantial long-term production potential and generated by use of renewable energy resources that may include solar, wind, hydropower, geothermal, fuel cells that are not fossil fueled, and biomass resources.

Renewable Energy Procurement Plan (REPP): PNM annual filing at the NMPRC that discusses plans to meet the Renewable Portfolio Standard set by the NMPRC.

Renewable Energy Transmission Authority (RETA): The New Mexico state authority created to facilitate financing and development of transmission and storage projects serving renewable resources.

Renewable Portfolio Standard (RPS): Statutory targets (e.g., 50% by 2030, 80% by 2040) requiring utilities to serve a defined percentage of retail sales with renewable energy.

Renewable Resources: Generation resources that are based on a renewable fuel supply.

Request for Information (RFI): A process by which a utility issues a solicitation to project developers to provide information on potential new resources for the purpose of gathering market intelligence. PNM periodically issues RFIs to ensure that planning assumptions reflect the best and most current available information in the market.

Request for Proposals (RFP): A process in which a utility issues a solicitation to developers to provide competitive bids for potential resources that will be evaluated by the utility to fill a specified procurement need.

Reserve Sharing Group (RSG): A group of balancing authorities that collectively share contingency reserve obligations and support one another following resource loss.

Resilience: As defined by FERC, the ability to withstand and reduce the magnitude and/or duration of disruptive events, which includes the capability to anticipate, absorb, adapt to, and/or rapidly recover from such an event.

Resource Adequacy (RA): The ability of a portfolio of resources to supply enough generation to meet demand across the year according to a predetermined reliability standard. PNM's standard for resource adequacy is based on a loss of load expectation of 0.1 days per year. To meet this standard, PNM plans to meet a minimum planning reserve margin requirement.

Retail Sales: The sale of energy to end users.

Revenue Requirement: Total sum of annual costs for meeting the system's energy requirements with all resources. This includes costs associated with existing utility-owned resources (depreciation and taxes, operations and maintenance, and fuel costs), existing power purchase agreements and energy storage agreements, and the costs of all new future resources included in the planning horizon.

Round Trip Efficiency (RTE): The percentage of electricity retrieved from an energy storage system compared to the total energy put into it during a full charge and discharge cycle.

S

San Juan Generating Station (SJGS): The retired coal-fired generating station in northwestern New Mexico formerly operated by PNM.

Scenario: A combination of sensitivity values used to generate portfolios.

Senate Bill (SB): Proposed legislation originating in the Senate of the state legislature or Congress.

Senate Bill 170 (Utility Pre-Deployment Act) (SB 170): 2025 New Mexico legislation authorizing utilities to develop infrastructure in advance of a binding customer commitment for certified economic development projects, subject to NMPRC approval.

Sensitivity: A variable that has a significant impact on risk evaluation.

Small Modular Reactor (SMR): A factory-fabricated nuclear generating technology with modular units of substantially smaller output than conventional reactors.

Solar Photovoltaic (Solar PV): Electric generation that uses photovoltaic panels to convert sunlight directly to energy.

Southwest Power Pool (SPP): The regional transmission organization serving the central United States and the administrator of Markets Plus and the Western Energy Imbalance Service.

SouthWestern Power Group (SWPG): The developer of transmission and generation projects in the desert Southwest, including the Bowie and associated transmission projects.

Spinning Reserves: Backup energy production capacity that can be available to a transmission system within 10 minutes and can operate continuously for at least two hours after being brought online.

Spot Prices: The price quoted for immediate settlement (payment) of a commodity.

Statement of Need: As defined by the IRP Rule, a description and explanation of the amount and the types of new resources, including the technical characteristics of any proposed new resources, to be procured, expressed in terms of energy or capacity, necessary to reliably meet an identified level of electricity demand in the planning horizon and to effect state policies. The Statement of Need is one of the primary outputs of the IRP process.

Static Var Compensator (SVC): A power-electronic device that rapidly supplies or absorbs reactive power to regulate transmission system voltage.

Steam Turbine (ST): A generating unit that converts thermal energy in steam into rotational energy to drive an electric generator.

Strategic Energy and Risk Valuation Model (SERVM): A probabilistic reliability and production simulation model used to evaluate resource adequacy and capacity contribution.

Supervisory Control and Data Acquisition (SCADA): The operational system that collects real-time telemetry from and issues control commands to field equipment.

Supplemental Analysis (SA): Additional analysis performed beyond the base study scope to address specific questions or stakeholder requests.

System Average Interruption Duration Index (SAIDI): A reliability metric representing the average total outage duration per served customer during a reporting period.

System Average Interruption Frequency Index (SAIFI): A reliability metric representing the average number of sustained interruptions per served customer during a reporting period.

T

Technical Assessment Guide (TAG): The EPRI reference used for generating technology cost and performance characterization.

Thermal Energy Storage: Various energy storage technologies that use electricity to heat materials or working fluids that can be stored at high temperatures and later used to transfer heat to generate electricity using a steam turbine. Thermal energy storage technologies offer potential for long-duration storage, providing duration of up to a week.

Time-of-Day (TOD): A rate structure in which the price of electricity varies by defined periods of the day to reflect differences in the cost of service.

Time-of-Use (TOU): A rate structure in which prices vary across defined on-peak, off-peak, and shoulder periods.

Total Transfer Capability (TTC): The maximum amount of power that can be reliably transferred across a defined interface under specified system conditions.

Transmission and Distribution (T&D): The facilities and systems that deliver electricity from generating resources to end-use customers.

Transmission Planning (TPL): The NERC Reliability Standards family establishing performance requirements and study obligations for transmission system planning.

Transportation Electrification Plan (TEP): The utility plan describing programs, infrastructure, and rate designs to support electrification of transportation.

Tri-State Generation and Transmission Association (TSGT): A generation and transmission cooperative serving member distribution cooperatives in New Mexico and neighboring states.

U

Unforced Capacity (UCAP): Installed capacity adjusted downward to reflect forced outage rates and expected availability.

V

Valencia Energy Facility (VEF): A gas-fired generating facility near Belen, New Mexico, from which PNM purchases capacity and energy.

Variable Costs: Costs that change with unit output. See also fixed costs.

Virtual Power Plant (VPP): An aggregation of distributed generation, storage, and flexible load dispatched collectively to provide grid services.

Voltage Source Converter (VSC): An HVDC converter technology that independently controls real and reactive power and can energize weak or passive networks.

W

Water Intensity: A measure of the water resource needed to generate over a defined period.

Western Area Power Administration (WAPA): The federal power marketing administration that markets federal hydropower and owns transmission across the western United States.

Western Electricity Coordinating Council (WECC): The regional entity responsible for reliability coordination and standards enforcement across the Western Interconnection.

Western Energy Imbalance Market (WEIM): The CAISO-administered real-time market that economically dispatches participating resources across the West.

Western Energy Imbalance Service (WEIS): The SPP-administered real-time imbalance market serving participants in the Western Interconnection.

Western Power Pool (WPP): The regional organization of Western utilities that administers reserve sharing and the Western Resource Adequacy Program.

Western Resource Adequacy Program (WRAP): The voluntary regional resource adequacy program administered by the Western Power Pool establishing binding seasonal capacity obligations.

Western Transmission Consortium (TWTC): The consortium of Western utilities collaborating on interregional transmission planning and development.

Wheeling: Transportation of electric power over transmission lines.

Whole House Electric Vehicle (WHEV): A residential rate or program category addressing whole-premise service that includes electric vehicle charging load.

Wind: Electric generation fueled by wind turbines.

APPENDIX C: 2026 IRP FACILITATED STAKEHOLDER PROCESS MATERIALS

This appendix provides Gridworks meeting summary materials for PNM's 2026 IRP Facilitated Stakeholder Process.

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PNM's 2026 Integrated Resource Plan – Stakeholder Orientation, Interests, and PNM Vision Workshop #1 (December 9, 2025), Virtual

WORKSHOP SUMMARY

Representatives from 46 organizations attended this workshop to meet the PNM IRP team, hear the PNM's perspective on planning in these times, and present stakeholders' highest-priority topics for upcoming discussions. Over 40 individuals introduced themselves and offered priority topics. The list of participating organizations (excluding PNM, its consultants, and Gridworks) is attached.

MATERIALS

- PNM Slides
- Gridworks Slides
- Workshop Recording
- Website for Stakeholder Process

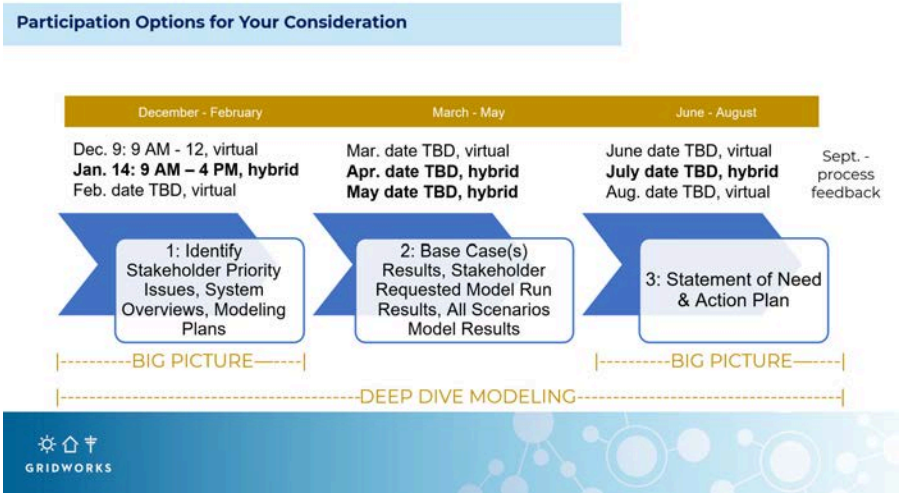
WELCOME AND INTRODUCTION

This orientation workshop, facilitated by the NM PRC-appointed facilitator, Gridworks, had the following objectives:

1. Describe stakeholder process, conceptual schedule, and options for engagement.
2. Meet the PNM IRP team and hear a PNM executive's vision/goals for 2046.
3. Hear and document stakeholders' primary topics of interest.
4. Preview the January workshop.
5. Build relationships and connections.

STAKEHOLDER ENGAGEMENT SCHEDULE AND OPTIONS FOR PARTICIPATION

A three-phase process, spanning the months of December 2025 through August 2026, offers opportunities for participating in "big picture, or" deep dive" modeling discussions or both. These phases are depicted in the figure.

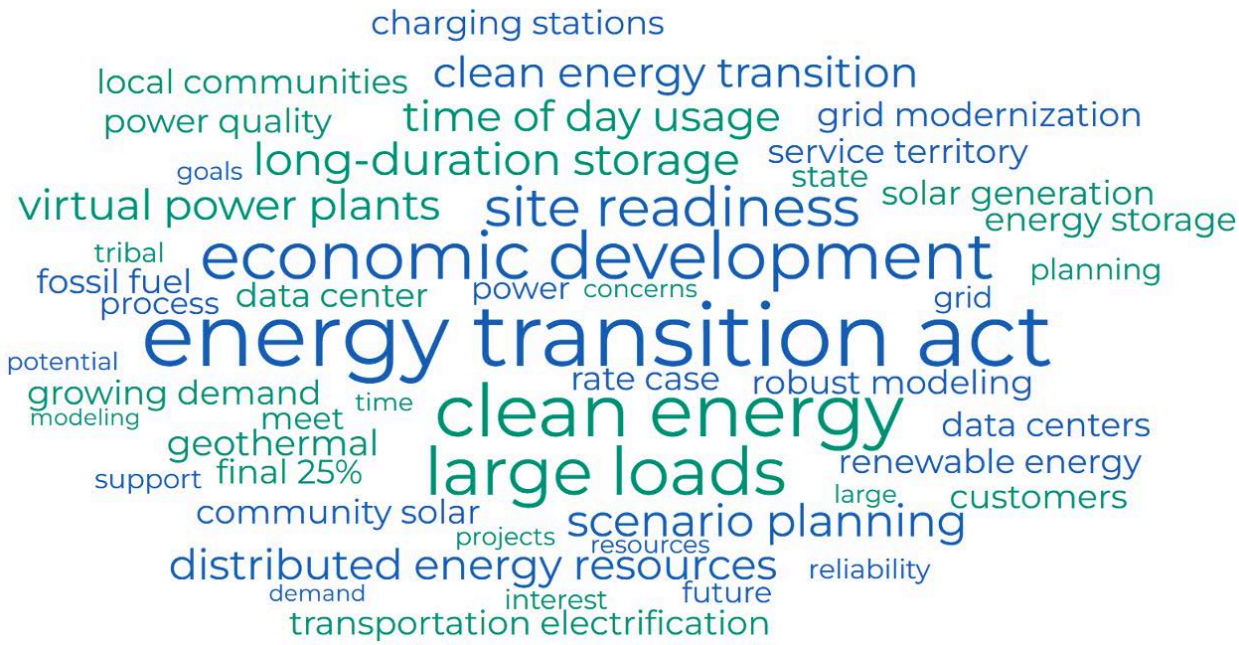


PNM TEAM AND PLANNING CONTEXT

Tom Duane (PNM's Director of Integrated Resource Planning) introduced the IRP team and supporting teams. Laurie Williams (Senior Vice President of Integrated Planning and Transmission Development) described the drivers for and benefits of moving from Integrated Resource Planning to Integrated System Planning, which PNM is moving toward in this and subsequent IRP cycles. She explained the need to balance considerations of environmental footprint, reliability, and customer cost. She summarized challenges and opportunities for the utility. Tom also provided an update on actions from the prior (2023) IRP, resource additions in process, and other pending resource and transmission filings.

STAKEHOLDER PRIORITY TOPICS

The remainder of the meeting was an opportunity for stakeholders to introduce themselves and offer a topic that is of most interest to them in this planning process. Forty individuals spoke, with interests ranging from power readiness needs to environmental progress to modeling approaches. Top interests are depicted in the "word cloud" below.



Key themes offered by the group include:

- Energy Transition Act. PNM's plans to continue the clean energy transition and do so affordably. Final 25% to decarbonization. Impacts of climate change are recognized in modeling assumptions. Grid modernization.
- Economic development. Preparation for future growth, power availability, and staying competitive. Site readiness. Power needs for expansion.

- Integration of demand side resources. Distributed energy, virtual power plants, and clean energy technologies. Modeling and valuing.
- Tribal perspectives. Restoration after wildfires, universal service/upgraded service on tribal lands, tribal energy sovereignty
- New technology options. Long-duration storage, geothermal. Modeling tools that co-optimize generation, transmission, storage, and large loads.
- Consumer and public communication. Examples include time-of-day rates and how we get our power.
- First timers. Understand what is happening, learn from the experience, ensure we are prepared for our future, and assess the impacts on my organization and me.

NEXT STEPS

A summary of this workshop is available at [Gridworks Website - PNM IRP](https://gridworks.org/initiatives/pnm-2026-integrated-resource-plan/) (https://gridworks.org/initiatives/pnm-2026-integrated-resource-plan/)

The next workshop will be held on January 14, 2026, from 9 AM to 4 PM

- CNM Workforce Training Center, Albuquerque, and via Zoom (with limited interaction capabilities)
- **In-person attendance is highly recommended.**
- The purpose is to build a foundation of knowledge on the PNM system, opportunities, challenges, available resources, and requirements. Participants will also be asked to choose between big-picture and deep-dive modeling.

Questions, concerns, and suggestions are welcome via info@gridworks.org or by contacting Margie Tatro at mtatro@gridworks.org or 505-205-0838.

WORKSHOP #1 PARTICIPATING ORGANIZATIONS (Excluding PNM, its consultants, and facilitators)

174 Power Global
350 New Mexico
Advanced Energy United
AES Corp
AzCPA
BP/Shell
City of Albuquerque
Clean Energy Buyers Association
Clean Energy Coalition of Santa Fe County
Coalition for Community Solar Access
Customers
Energy Strategies
Form Energy
GridLab
Hanwha Renewables
Hecate Energy
Mescalero Apache Telecom, Inc.
META
New Mexico Gas Co.
New Mexico Partnership
NextEra Energy Resources, LLC
NM Affordable Reliable Energy Alliance
NM Economic Development Department
NM RETA
NMPRC
PNE-AG
Renewable Energy Industries of NM
Sandia National Labs
Sandia Pueblo
Sandoval County Economic Development Department
Sandoval Economic Alliance
Sierra Club
Single Space Strategies
Solariant Capital, LLC
Sovereign Energy
SWEEP
Third Act NM
Village of Los Lunas, Economic Development Division
Walmart
Western Environmental Law Center
WRA

PNM's 2026 Integrated Resource Plan
PNM System, Challenges, and Opportunities
Workshop #2 - Hybrid
January 14, 2026

WORKSHOP SUMMARY

Representatives from 59 stakeholder organizations attended this workshop to learn about or get updates on PNM's current resources, opportunities, challenges, constraints, and planning landscape. Over 96 individual stakeholders attended: 31 in person and 65 virtually. The list of participating organizations (excluding PNM, its consultants, and facilitators) is attached.

MATERIALS

- **Gridworks slide deck**
- **PNM slide deck**
- **Workshop recording (note that ZOOM "station discussions" are included, in-person "station discussions" are not):** https://youtu.be/mw3xEaPLYvM
- **Discussion Guides**
  - **Demand Forecast**
  - **Supply Resources**
  - **Behind the Meter Resources**
  - **Transmission and Market-Enabled Resources**
- **Materials shared during the day:**
  - **PNM 20-Year Transmission Outlook**
  - **DOE Pathways Report Next Generation Geothermal**
  - **Potential economic development sites sites.partnerwithPNM.com**

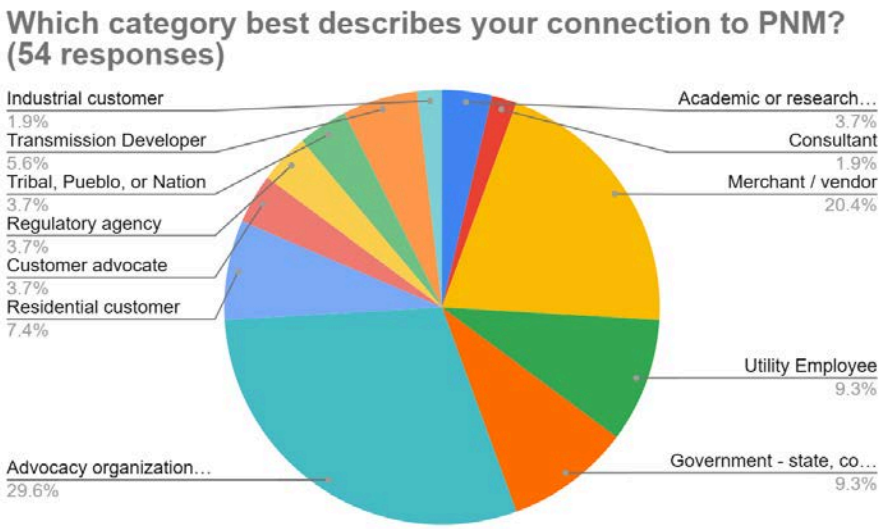
WELCOME AND INTRODUCTION

This orientation workshop, facilitated by the NM PRC-appointed facilitator, Gridworks, had the following objectives:

1. Build a foundation of shared knowledge about the PNM system, opportunities, and challenges.
2. Facilitate discussions among participants and PNM subject-matter experts on key topics.
3. Introduce a framework to orient stakeholders and introduce them to the in-depth work ahead.
4. Gather baseline information to measure the process's success.
5. Build relationships and connections, and offer appreciation for stakeholders.

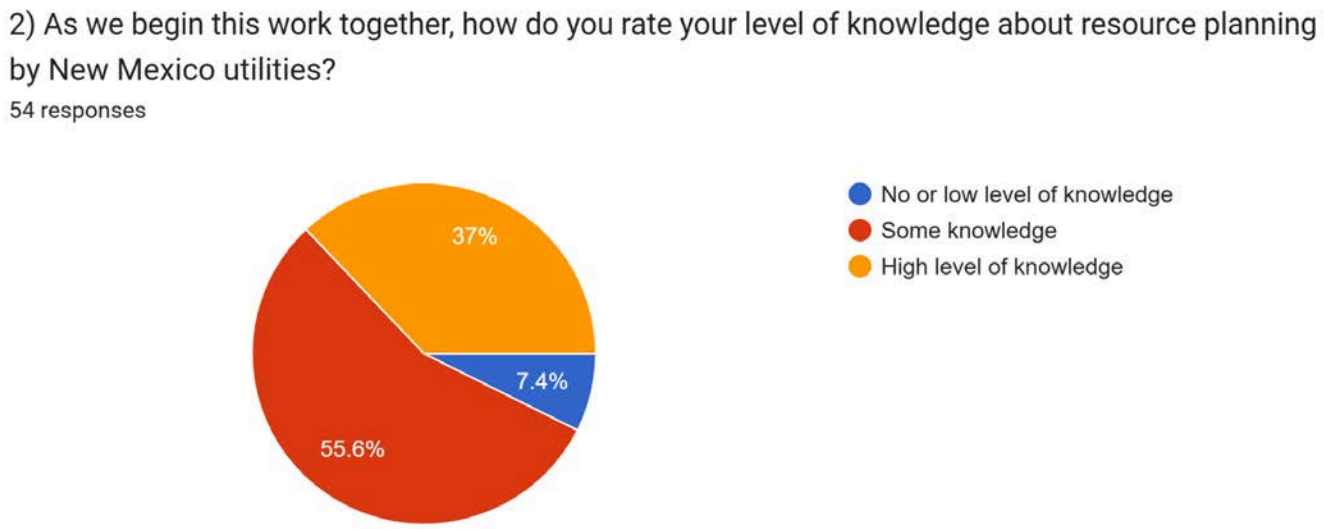
All participants had the opportunity to introduce themselves and complete a survey on their knowledge of electric utility planning, primary interests, and their desire for materials in advance of future workshops. Over 50% of respondents requested materials three business days prior to future workshops. Respondents also offered suggestions of groups that should be invited to participate in this process.

Participants were asked about their connection to PNM:

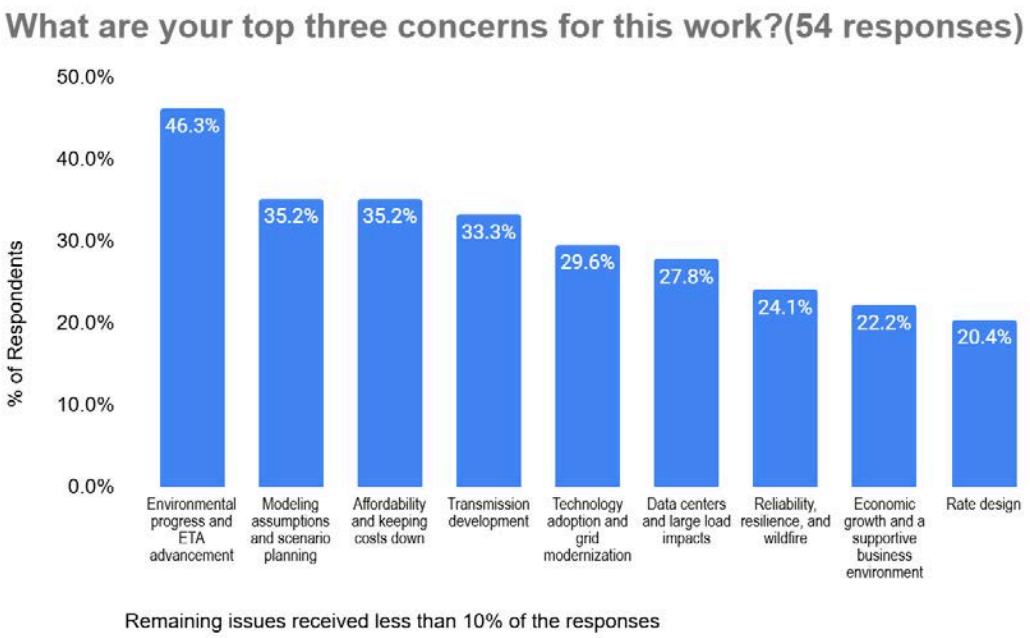


*Utility employees include 2 gas and 2 electric utility respondents.

Their level of knowledge about the resource planning process:



And their top three concerns:



IRP PURPOSE AND PNM SYSTEM OVERVIEW, REQUIREMENTS, AND MODELING FRAMEWORK

PNM staff presented information about the purpose, components, considerations, and objectives of the IRP. PNM's resource mix, pending activities, affordability drivers, planning requirements, and planning landscape were described. The PNM team presented a high-level overview of the 2026 IRP modeling framework, including envisioned futures, scenarios, and sensitivities to be analyzed. A summary of 2023 IRP stakeholder comments was included in the PNM slide deck and, due to time constraints during the day, participants are encouraged to review these slides (32-37) at their convenience. Participants' questions were offered both verbally and in writing. Questions that were not addressed during workshop #2 will guide future workshops and utility comments.

KNOWLEDGE FOUNDATION IN SUPPORT OF THE CENTRAL QUESTION

The afternoon activity included small-group discussions with PNM's subject-matter experts in four areas: demand forecasting, supply-side resources, distribution and behind-the-meter resources, and transmission- and market-enabled resources. **These topics are key to the central question for the stakeholder process: "What is PNM's resource need to meet expected demand?"** Two-page discussion guides served as the starting point for discussions, and all attendees had the opportunity to discuss all four areas. The group then reflected on the discussions and offered additional questions or topics that needed further discussion.

Discussion themes from each of the four stations are summarized below:

Demand Forecasting

- **Resources or load modifiers?:** What are the forecasted quantities of energy efficiency, customer-sited solar, batteries (including electric vehicles), and demand response projects and how do they compare with current actual values? Are these being considered as load modifiers or resources?
- **Elements of demand**: What are the contributions from electric vehicles, building electrification, energy efficiency, and demand response compared with data center growth?
- **Characteristics of demand**: ramp schedules, customer type, and impacts of severe weather are of interest to stakeholders.
- **Data center loads**: Stakeholders were interested in the quantity of data center loads included in the projected demand curve, the maturity phases of data center projects, and the threshold size of economic development projects. Alternative approaches to the High Economic Development scenario, such as Public Service Company of Colorado's incremental need pool concept or a reduced ramp rate for new loads due to "supply chain" constraints, were offered by stakeholders.

Supply-side Resources

- **Sources for cost data and affordability interests:** What information is used to inform costs for supply-side resources? Are the costs regionally specific? How are resources with high fixed costs but low/no fuel costs compared to resources with relatively lower capital costs but exposure to market fuel prices?
- **Geothermal and small modular reactor resources cost data:** Stakeholders encourage a closer look.
- **IRP and RFP connections:** How are RFP results modeled, and how are they connected to IRP model results?
- **Gas volatility and infrastructure availability:** There is interest in the upcoming gas volatility study and also in the capacity of the gas delivery infrastructure.
- **Modeling a "no ETA" scenario:** Stakeholders sought a better understanding of the purpose of such a scenario and the information it provides regarding the cost of compliance.

Distribution and Behind-the-Meter Resources

- **Resources or load modifiers?:** What are the forecasted quantities of the behind-the-meter resources, and how do they compare with current actual values? Are these being considered as load modifiers or resources?
- **Time-of-Use (TOU) assumptions:** What are the TOU assumptions and impacts on load forecasts?
- **Advanced Metering Infrastructure (AMI):** Participants are curious about data privacy and customer choice options associated with smart meters.
- **Demand response and data centers:** Will data centers join demand response programs?

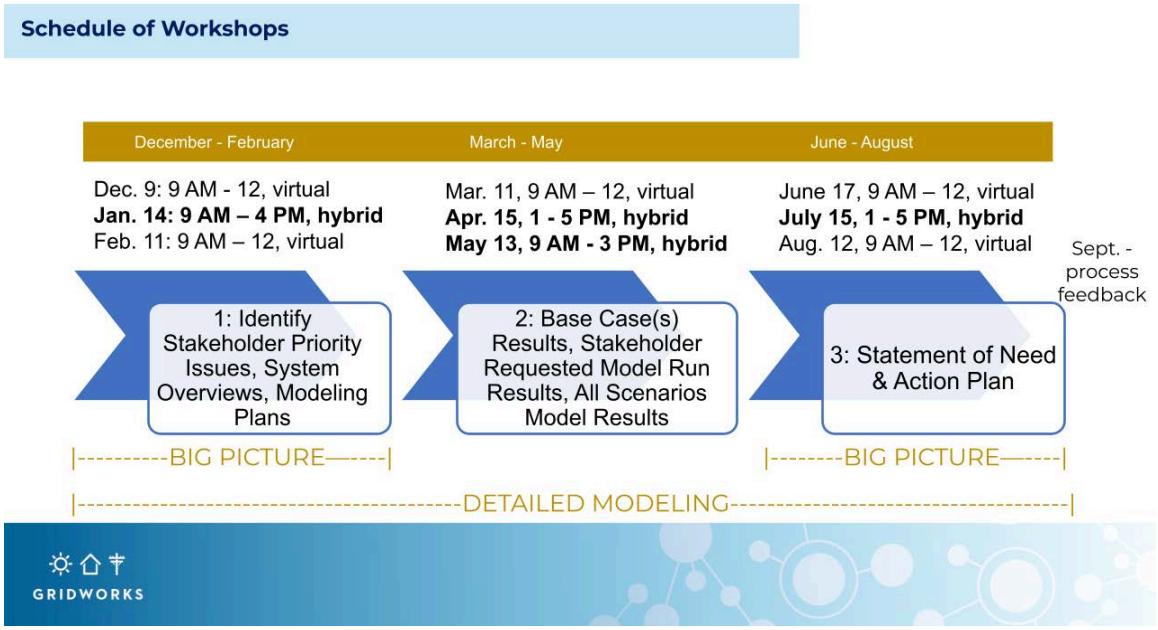
- **Load terminology:** Understanding the differences between flexible and variable loads.
- **Engaging the public:** Some stakeholders are interested in educational efforts to bring others along and explain how they can be constructive participants in the energy transition journey.

Transmission and Market-Enabled Resources

- **Retail load vs. transmission service:** PNM's transmission service ("rights" to move electricity across PNM's transmission system) is almost double its retail customer load. This creates a complexity for planning; need to account for flow-throughs and PNM's transmission service business.
- **Market developments:** PNM will enter the Extended Day Ahead Market in Oct. 2027, giving it access to a broader array of low-cost resources and sharing opportunities, as well as opportunities to sell excess solar. This will change how the transmission system is used and how it should be modeled. Not yet clear how or to what extent this can inform resource planning and the modeling of transmission as a resource.
- **Transmission in modeling:** interest in an iterative process from the nodal analysis, production cost modeling, and back to the capacity expansion analysis. Desire to see zonal transmission cost adders like in the 2023 IRP. PNM plans four transmission sensitivities (RioSol, SunZia, Blackwater DC tie, Four Corners). Also studying transmission expansion for interconnection needs.
- **Regional transmission scenario:** participants expressed strong interest in developing a regional transmission scenario for consideration in this resource plan.
- **PNM's 20yr Transmission Outlook:** takes a statewide, zonal approach to resource development and the transmission needed to enable those resources. Will inform IRP modeling.
- **Transmission to support economic development:** PNM is studying a cluster approach and developing a master plan of potential development sites for exploratory customers. See sites.partnerwithPNM.com.

STAKEHOLDER ENGAGEMENT SCHEDULE AND OPTIONS FOR PARTICIPATION

The schedule of future workshops was presented, see below. A three-phase process offers opportunities for participating in "big picture, or" detailed modeling" discussions or both. Stakeholders requested more details regarding topics for each workshop, which will be provided.



NEXT STEPS

A summary of this workshop is available at [Gridworks Website - PNM IRP](https://gridworks.org/initiatives/pnm-2026-integrated-resource-plan/) (https://gridworks.org/initiatives/pnm-2026-integrated-resource-plan/)

Workshop #3 will be held on February 11, 2026, from 9 AM to 12 PM via ZOOM.

The focus will be on preparing for modeling. A short session will be included to address many "big picture" questions posed during workshop #2. Modeling topics will include inputs, assumptions, futures, sensitivities, nodal analysis, and model runs currently planned by PNM.

Stakeholders are asked to be prepared to discuss their specific modeling information requests using the discussion guides from workshop #2 as a starting point. The information sharing mechanism will be described during this workshop. **Stakeholder requested modeling runs will be discussed at workshop #4 on March 11.**

Questions, concerns, and suggestions are welcome via info@gridworks.org or by contacting Margie Tatro at mtatro@gridworks.org or 505-205-0838.

GRIDWORKS

WORKSHOP #2 PARTICIPATING ORGANIZATIONS (Excluding PNM, its consultants, and facilitators)

In-person Attendees

350 NM
Ameren - Lucky Corridor
AzCPA
City of Albuquerque
Customers (3)
Exus Renewables
Gould Law Firm
New Mexico Gas Company
NextEra
NM Affordable Reliable Energy Alliance
NM RETA
NM PRC
Pacific Fusion
Renewable Energy Industries of NM
Sandia National Labs
Sandia Pueblo
Southwestern Power Group
SWEEP
Third Act NM
Walmart
WRA

ZOOM Attendees

Advanced Energy United
AES Clean Energy
Allum Renewable Energy
Bernalillo County Economic Development
Boehm, Kurtz & Lowry Law
City of Albuquerque
California Independent System Operator
CDG Engineers
Clean Energy Buyers Association
City of Lordsburg Economic Development
Clean Energy Coalition for Santa Fe County
Clenera
Coalition for Clean Affordable Energy
Coalition for Community Solar Access
Customer
Energy Futures Group
esVolta
Exus Renewables
Form Energy
Grid United
Gridlab
Interwest Energy Alliance
Invenergy
Mescalero Apache Telecom, Inc.
MMR Group
New Mexico Gas Company
NM Affordable Reliable Energy Alliance
NM DOJ
NM Economic Development Department
NM RETA
NM PRC
NM State Land Office
Onward Energy
Ormat
Pattern Energy
Renewable Energy Industries of NM
Sandia National Labs
Santa Fe County Economic Development Division
Solariant Capital, LLC
Southwestern Power Group
Sovereign Energy
Tesuque Pueblo
Walmart
Western Environmental Law Center
WRA
Unknown (2)

PNM's 2026 Integrated Resource Plan
Modeling Foundation, Workshop #3 - Virtual
February 11, 2026

WORKSHOP SUMMARY

Representatives from 48 stakeholder organizations attended this workshop to explore the modeling framework, inputs, assumptions, and plans for the PNM-initiated modeling work. PNM shared load and resource information, energy and demand forecasts, and the framework it intends to use for its resource modeling. PNM also described the process for requesting access to modeling information. Gridworks presented the themes and dates for future workshops. Over 66 individual stakeholders attended. The list of participating organizations (excluding PNM, its consultants, and facilitators) is included at the end of this document.

MATERIALS

- **Gridworks' Deck Link:** Modeling Foundation WORKSHOP #3.pptx
- **PNM Deck Link:** PNM-IRP-2026-Workshop-3-February.pdf
- **Workshop recording:** https://youtu.be/Q1ntNCX8e0w
- **Materials shared during the day:**
  - PNM-2025-Potential-Study-Report_2025-11-03-5.pdf
  - **Instructions for** Accessing-IRP-Modeling-Data.pdf
  - Stakeholder-Information-Sharing-Request-Form-2.pdf
  - PNM Confidentiality Agreement 2023 IRP Stakeholder Facilitated Process Final

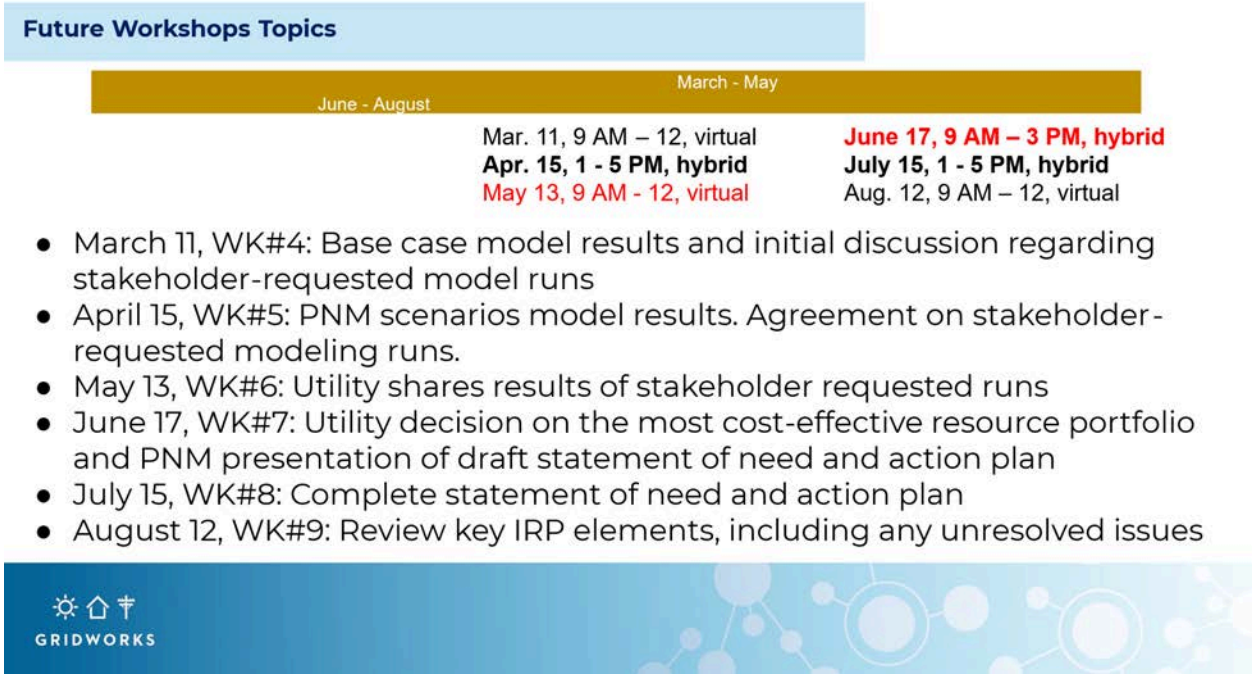
WELCOME AND INTRODUCTION

This modeling foundation workshop had the following objectives:

- Share topics and timing for upcoming stakeholder conversations
- Share information on modeling inputs and assumptions, plans for running base case(s), and the process for stakeholder access to modeling information
- Prepare stakeholders to understand the results of base case model runs to be presented during workshop #4
- Begin detailed modeling conversations

ENGAGEMENT OPTIONS

After a review of the results of the participant poll from Workshop #2, and a summary of themes for future workshops, participants had the opportunity to indicate whether they wished to engage in detailed modeling discussions or take a step back during modeling, then re-engage in the June-August timeframe for work on the statement of need and action plan.



MODELING FOUNDATION: INPUTS, ASSUMPTIONS, AND MODELING FRAMEWORK

PNM staff presented information about the loads and resources tables, demand forecasts for both energy and capacity, the modeling framework, including planned model runs, and a summary of energy efficiency and demand response options. Main themes of discussions are listed below:

PNM's resource position

- PNM's system is generally adequate through 2035, although the margin varies depending on whether economic growth is high or low.
- RPS compliance: 40%, increasing to 50% by 2030.
- Energy long, causing curtailments of renewable generation. Capacity short.
- Any new gas CTs will include the cost of hydrogen burn conversion.
- Behind-the-meter solar is treated as a load modifier.

Action plan and planning period

- Action plan: 2026-2029
- Planning period: 2026-2045
- This IRP is to develop the resources for 2032 and beyond. An action plan for a 3-yr period is not enough runway to account for supply chain difficulties, permitting issues, and the lead time needed to bring new large-scale resources online.

Three potential futures PNM will use to frame modeling

- Current Trends and Policies (CTP)
- Low economic growth (LEG)

- High economic growth (HEG)

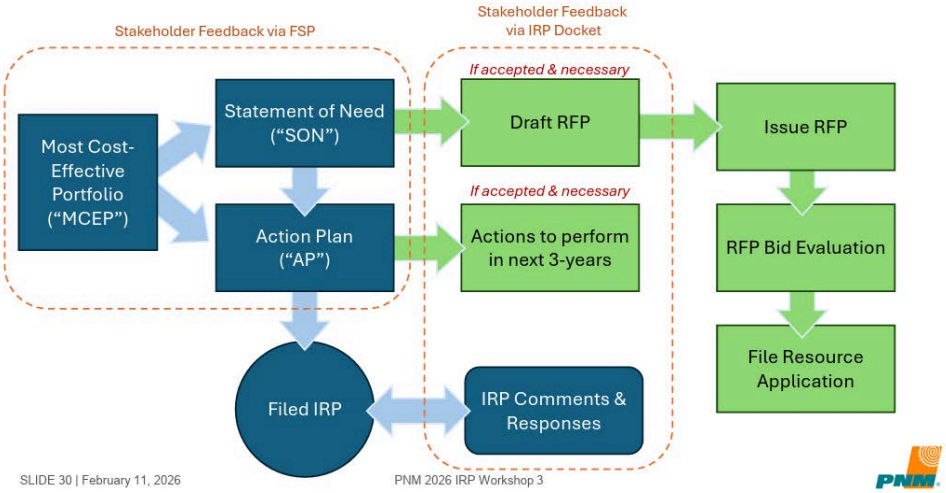
Supplemental RFP for firm dispatchable generation, expected in the next few weeks

- NM PRC Case #23-00409-UT
- Material event filed in January 2026.

Smart meter rollout (AMI) and Time-of-Day (TOD) rate

- Small pilot in the field now. Full rollout expected by 2028; first year of data by 2029.
- Concerns about privacy issues; communication to the general public about time-of-use. rates and behavioral change. Add this as input to the action plan?
- PNM is working on a TOD rate structure; a future filing will be made at the PRC.

Interaction between this resource plan (IRP) and a future solicitation (RFP)



Renewable Portfolio Standard / Energy Transition Act / Carbon-free corporate goal

- PNM is working to balance carbon-free requirements with its corporate 2040 goal while addressing affordability concerns. High curtailment rates for renewable energy and concerns about additional capital expenditures.
- No ETA scenario is in response to requests from consumer advocates and affordability concerns.

MODELING INFORMATION

The PNM team described the process for requesting access to modeling information and presented a list of information to be posted on the shared site, VENUE. Instructions for accessing modeling information are provided in the following document: **Accessing-IRP-Modeling-Data.pdf.** Individuals are invited to complete the forms and email them to IRP@PNM.com:

- **Stakeholder-Information-Sharing-Request-Form-2.pdf**
- **PNM Confidentiality Agreement 2023 IRP Stakeholder Facilitated Process Final**

Questions about information or the access process can be sent to IRP@PNM.com. The files on Venue will be available to all who request access from PNM, subject to confidentiality restrictions.

NEXT STEPS

Stakeholders requested the following information:

- Provide ELCC data by resource type
- Input and output files from SERVM, access to virtual software?
- Provide the load profile data from PNM's EV charging program
- Energy and capacity projections, 2025-2046, stacked bar chart by components
- Share the work papers for the EE bundles
- Provide the probabilistic model for new loads
- Discussion about enhanced geothermal cost assumptions

A summary of this workshop is available at Gridworks Website - PNM IRP (https://gridworks.org/initiatives/pnm-2026-integrated-resource-plan/)

Workshop #4 will be held on March 11, 2026, from 9 AM to 12 PM Mountain Time via Webex. Results from the base case model and initial discussion of stakeholder-requested model runs will be presented.

Questions, concerns, and suggestions are welcome via info@gridworks.org or by contacting Margie Tatro at mtatro@gridworks.org or 505-205-0838.

WORKSHOP #3 PARTICIPATING ORGANIZATIONS (Excluding PNM, its consultants, and facilitators)

Advanced Energy United
Black Forest Partners
CDG Engineers
CEBA
Citizens for Alternatives to Radioactive Dumping
Clean Energy Coalition of Santa Fe County
Clenera
Coalition for Clean Affordable Energy
Customers (3)
El Paso Electric
Energy Futures Group
Exus Renewables
Form Energy
Geothermal Scientist
Goschke Energy Advisors
Gould Law Firm
Grid United
GridLab
Hecate Energy
Senator Heinrich's Office
IEEE
Interwest Energy Alliance
Invenergy
Jupiter Power
Kinetic Power, LLC
New Mexico Gas Co
NextEra Energy Resources, LLC
NM Affordable Reliable Energy Alliance
NM Economic Development Department
NM EMNRD
NM PRC
NM RETA
NM State Land Office
OE Solar
Pacific Fusion
Sandia National Labs
Sandia Pueblo
Santa Ana Pueblo
Single Space Strategies
Sovereign Energy
SWEEP
Third Act NM
Walmart
Western Resource Advocates
US Department of Energy
Unidentified (1)

PNM's 2026 Integrated Resource Plan
Modeling Foundation, Workshop #4 - Virtual
March 11, 2026

WORKSHOP SUMMARY

Representatives from 40 stakeholder organizations attended this workshop to receive an update on modeling activities and begin sharing stakeholders' interests in model runs to supplement PNM's runs. Base-case model results were not available due to some modeling issues; Gridworks will notify the stakeholders when they are posted on the shared file site (Venue). PNM updated participants on the list of available modeling information on the VENUE site. PNM discussed the framework for requesting additional modeling, and stakeholders suggested six initial topics of modeling interest.

Fifty-three individual stakeholders attended. The list of participating organizations (excluding PNM, its consultants, and facilitators) is included at the end of this document.

MATERIALS

- **Gridworks' Deck: Gridworks Slide Deck**
- **PNM Slide Deck: PNM Slide Deck**
- **Workshop recording: https://youtu.be/j9hNUTVdr6w**

WELCOME AND INTRODUCTION

This workshop had the following objectives:

- Update participants on activities since Workshop #3
- Inform participants about the status of modeling activities
- Share stakeholders' model run interests
- Understand the process for proposing stakeholder ideas for additional model runs

ACTIVITIES SINCE WORKSHOP #3

Three "office hour" sessions were held over the past month. Session summaries and key outcomes are shown below. Recordings of each are available at https://gridworks.org/initiatives/pnm-2026-integrated-resource-plan/

Transmission Office Hour Feb. 17, 2026	47 attendees	• Transmission questions answered • GETs white paper and PNM 20-Yr Transmission Outlook shared
Geothermal Office Hour March 4, 2026	50 attendees	• Add hydrothermal as a resource option • Geothermal cost and timing sensitivity • Identification of best locations
Follow Up Office Hours March 11, 2026	30 attendees	• Discussion of written responses to 25 questions, also posted • Dialogue to reach clarity on outstanding questions

During the March 4 Geothermal Office Hour, stakeholders proposed consideration of RFP bid language to accommodate enhanced geothermal resources. PNM directs interested stakeholders to the RFP process that will follow this IRP to further that work.

Next, PNM responded to previous questions and allowed time for additional stakeholder questions and clarifications. PNM provided the following guidance about modeling software access and data files:

EnCompass can be made available with some limitations:

- Organizations will need to select a single individual for access.
- PNM computer access agreement and procedures will need to be completed and followed.
- Ability to use the software or work with the data structure requires experience. PNM will not be providing training or support.
- Parties requesting access will need to contact PNM at irp@pnm.com along with a phone number for PNM to discuss.

EnCompass and SERVM data files can be made available on Venue site.

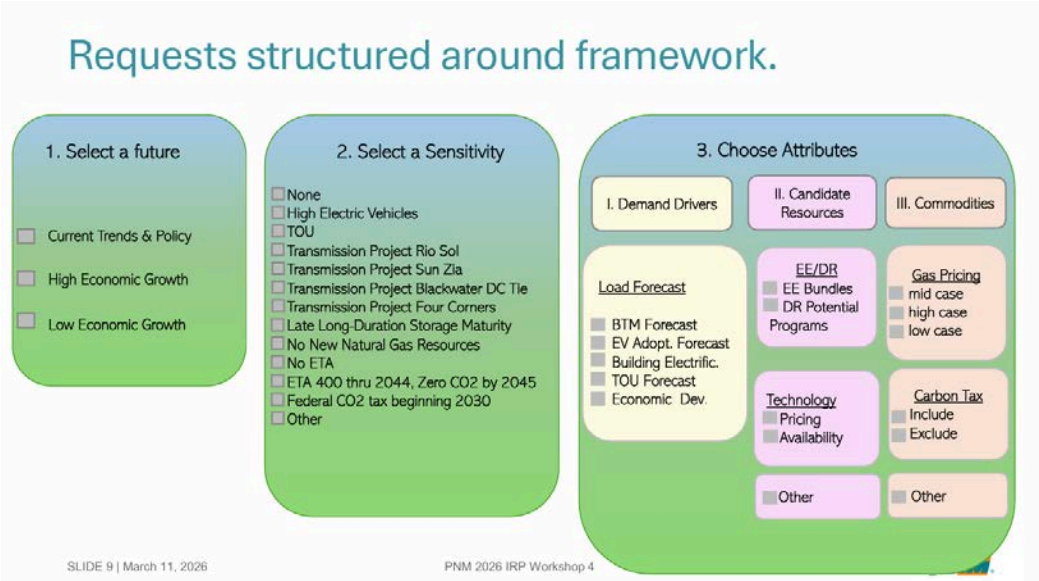
- EnCompass database and output summaries in Excel format will be placed on the confidential VENUE site.
- SERVM data files can be made available in csv format. An executable version can be obtained from PowerGem if a stakeholder licenses SERVM.

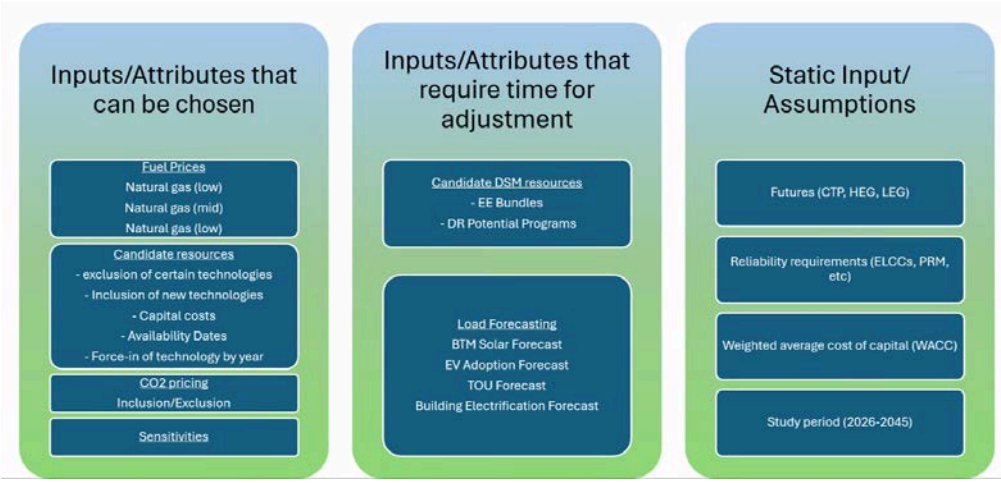
New questions during this workshop centered around the following themes:

- **Hydrogen:** cost assumptions, conversion cost, green fuel availability, and changes in federal funding. PNM agreed to add hydrothermal as a resource option.
- **Modeling inputs:** load growth projections, natural gas price forecast, import tariff and resource costs, and resource adequacy assumptions
- **Policy alignment and the Energy Transition Act:** PNM's 100% carbon-free goal by 2045, state requirements under the ETA, and the no ETA sensitivity
- **Data centers and large loads:** infrastructure needs, stranded costs, and PNM's large load tariff expected later this year
- **Process and timeline:** date for base case results and deadline for stakeholder requests on modeling runs

PNM informed the group that base-case model results are not ready due to modeling issues, but will be shared with stakeholders as soon as they are available via the VENUE site and during Workshop #5 (April 15).

PNM reviewed the framework for stakeholder model run requests and provided the guidance below:





STAKEHOLDER MODELING RUN INTERESTS

PNM consultant Ben Elsey (E3) led a discussion on stakeholder ideas for additional modeling runs. Discussions centered on two key questions:

1. What is at the core of stakeholders' modeling run interests?
2. Which runs will yield new insights to inform the statement of need?

See below for a summary of the discussion, including the names of stakeholders interested in further definition and the objectives of each topic. Stakeholders with an interest in the listed topics are invited to email mtatro@gridworks.org to be added to the informal "working groups" for each topic. Gridworks will contact these working groups to encourage conversations in advance of the April 15 workshop.

GRIDWORKS

Residential DER

- Higher DER penetration - accelerated timing, higher quantity
- Higher battery attachment rates (50%)
- Higher solar growth (40% BTM addition)
- EV adoption rates, V2G, managed charging program
- Building electrification
- Included as a candidate resource in modeling - selected when economic
- Model a range of capacity amounts (supply curve)
- Cost assumptions-see Venue files
- TOU rates
- C&I DER target

Brian Turner, Glenn Wikle, Brad Heusinkveld, Ramon Alatorre, Alex Eubanks, Anna Sommer, Jaime McGovern, Randy Coleman, Barbara Chatterjee

Energy Transition Act 2045 Achievement

- 100% carbon free, 2045
- 10-20% clean firm (geothermal) + 80-90% mix of wind, solar, battery backup
- No new nuclear; some imports from Palo Verde
- Reasonable proxy: no new natural gas + carbon tax?
- No hydrogen, no carbon capture
- FT rates for future gas units

Tom Solomon, Anna Sommer, AnnaLinden Weller, Jaime McGovern

Geothermal

- Model resource expansion as a generic resource?
- Reduced capex costs, both hydrothermal and geothermal
- Long duration storage-pumped storage
- Replace some of the six existing PNM gas combustion plants with geothermal plants of the same or larger capacity at the same location using the existing grid connection.

Tom Solomon, Glenn Wikle, Daren Zigich, Anna Sommer, Jaime McGovern

Transmission Connectivity

- PNM plans: 4 line scenarios
- Lightning Dock line upgrade?
- Southline expansion
- Regional transmission scenario: multiple lines

AnnaLinden Weller, Tom Solomon, Jacob Richardson, Remy Franklin, Kelly Gould, Anna Sommer, Jaime McGovern

Large Loads/Long Duration Storage

- Large load customer subsidizes capex for long duration storage or other tech (lower resource cost in the modeling)
- How does an LDES resource impact capacity expansion?

Daren Zigich, Cara Lynch, AnnaLinden Weller, Brian Andrews, Glenn Wikle, Patrick Goschke, Anna Sommer, Jaime McGovern, Kelly Gould, Brad Heusinkveld, Randy Coleman

Gas Availability

- No gas availability in winter - SERVM resource adequacy

Anna Sommer, Jaime McGovern

NEXT STEPS

- **If stakeholders have additional questions:** submit by email to IRP@pnm.com and info@gridworks.org by this Fri., 3/13, 5 PM. Written responses will be posted on the Gridworks website by Fri., 3/20, 9 AM. Gridworks will also notify stakeholders of this posting via email.
- **For further dialogue,** the team will be hosting an additional office hour on Wednesday, Mar. 25, 1:30-2:30 pm MDT via WebEx. The discussion will begin with written questions submitted by 3/13.
- **Next workshop:** Wed., April 15, 9 am-3 pm MDT, CNM Workforce Training Center, Albuquerque (5600 Eagle Rock Ave NE, Albuquerque, NM 87113). In-person attendance is strongly recommended, though a Webex link will also be available. This is a time change from the previously announced schedule. The morning session will focus on model results, and the afternoon will aim to reach agreement on stakeholder-requested modeling runs.
- **Follow-up items for PNM:**
    - Touch base with PowerGem to release SERVM files
    - Check with consultants regarding hydrogen cost assumptions. Does it account for federal changes to hydrogen funding?
    - Large load treatment in SERVM, subject to weather risk assumptions?
    - Notify Gridworks when base case results are loaded in Venue so that stakeholders can be informed
    - Clarify the Siemens gas price volatility study vis-à-vis the commodity costs in the shared files
    - Elaborate on the criteria PNM will use to evaluate portfolios: most cost-effective, risk, and reliability tradeoffs
    - Future model iterations combining scenarios to explore synergies

Questions, concerns, and suggestions are welcome via info@gridworks.org or by contacting Margie Tatro at mtatro@gridworks.org or 505-205-0838.

GRIDWORKS

WORKSHOP #4 PARTICIPATING ORGANIZATIONS (Excluding PNM, its consultants, and facilitators)

350 New Mexico
Advanced Energy United
AES Clean Energy
Black Forest Partners
CDG Engineers
Clean Energy Buyers Association (CEBA)
Clean Energy Coalition of Santa Fe County
Coalition for Clean Affordable Energy
Customers (2)
Deutsch Domestic Water Company, Inc
EDD
Energy Futures Group
esVolta
Geothermal Scientist/h4ngi Energy
Goschke Energy Advisors
Grid United
Gridlab
Hecate Energy
Senator Heinrich's Office
Invenergy
Jupiter Power
Kinetic Power, LLC
New Mexico Gas Co.
NM Affordable Reliable Energy Alliance
NM PRC
NM RETA
Pacific Fusion
Pattern Energy
Sandia National Labs
Sandoval Economic Alliance
Senate Energy and Natural Resources Committee
Single Space Strategies
SWEEP
Third Act NM
Tierra Adentro Growth Capital (TAGC)
Vote Solar
Walmart
WRA
Xcel Energy

PNM's 2026 Integrated Resource Plan
Base Case Results and Refining Stakeholder-Requested Model Runs
Workshop #5 – Albuquerque and Webex
April 15, 2026

WORKSHOP SUMMARY

Representatives from 36 stakeholder organizations attended this workshop to discuss results from PNM's base case modeling efforts and to develop stakeholder modeling run requests. The PNM IRP team presented model results for three futures – Current Trends and Policies (CTP), Low Economic Growth (LEG), and High Economic Growth (HEG)- and a variety of sensitivities for each future. Participants offered ideas for additional model runs, and several stakeholders volunteered to develop specific requests.

Over 61 individual stakeholders attended, with 24 in person. The list of participating organizations (excluding PNM, its consultants, and facilitators) is included at the end of this document.

MATERIALS

- **Gridworks' Deck Link:** Gridworks slide deck
- **PNM Slide Deck:** PNM slide deck
- **PNM Data on TOU, EVs, and TOU:** Supplemental Data: Economic Growth, EV and TOU
- **Workshop recording:** https://youtu.be/MuYniHCaGa8
- **GridLab report:** https://gridlab.org/datacenter_flex/
- **Geothermal siting presentation:** Geothermal Sites for IRP v1 14-Apr-26 (1)
- 2026 Integrated Resource Plan Stakeholder Scenario Request Form – Fill out form

WELCOME AND INTRODUCTION

This workshop had the following objectives:

- Understand base case model results
- Identify, develop, and refine stakeholders' model run requests that complement utility modeling efforts
- Gather suggested improvements to the stakeholder engagement process (mid-point feedback)

The stakeholder engagement process has included 5 workshops and 5 additional office hour sessions to date. Four workshops remain. Stakeholders were invited to reply to a 3-question mid-process feedback survey. The survey is available via the QR code at the right or https://forms.gle/acRG2Em1HCEUojGV9.

Activities since Workshop #4 included the opportunity for written questions (3/13/2026), the March 25 Office Hour to address questions arising after workshop #4, the formation of 6 modeling request working groups, and the posting of model results in presentation format (PNM slide deck) and on VENUE (4/8/2026).

BASE CASE MODEL RESULTS

The PNM IRP team presented model results for three futures – Current Trends and Policies (CTP), Low Economic Growth (LEG), and High Economic Growth (HEG) – and a variety of sensitivities for each future. Themes of stakeholder questions regarding the model results included the following:

- Achieving the Energy Transition Act (ETA) requirements, particularly for 2040 and 2045
- Relationship between the current RFP activity and IRP modeling
- Clarification of the action plan period versus the modeling focus period
- Understanding assumptions of the High Economic Growth future and review of the EV and TOU components in the demand forecasts (see supplemental data posted following the workshop: Supplemental Data: Economic Growth, EV and TOU)
- TOU rates, relationships with rooftop solar resources, and communication with the public
- Long-duration storage and geothermal resource potential (see information provided regarding Geothermal Sites for IRP v1 14-Apr-26 (1))
- Transmission implications for new generation resources

Understanding of model results is key to the formulation of stakeholder modeling run requests. The afternoon session of the workshop focused on these requests.

STAKEHOLDER MODELING RUN INTERESTS

The PNM team explained the model run request form using an example of modifying the HEG future parameters to include greater customer-sited PV penetration.

Attendees discussed five model run request topics identified as a priority during Workshop #4, plus a new idea on fusion as a candidate resource. (The topic of transmission connectivity will be discussed during the April 20 Office Hour, scheduled for 2:30-3:30 PM MDT via Webex.) Representatives from working groups, formed after Workshop #4, provided updates and shared their objectives for each request, and individuals offered to lead the development of the requests. PNM and its consultant, Ben Elsey, are available to assist stakeholders with refining these requests.

The six model run ideas discussed, along with the names of individual stakeholders who offered to submit the model run request form for each, are listed below:

- **Flexible large load interconnection**. Nikhil Kumar (lead), Gwen Farnsworth, Orland Whitney
    - Requirements for large loads to curtail during peak hours; impact on resource needs.
- **Decarbonization**. AnnaLinden Weller (lead)
    - Interim steps to meet 2040 and 2045 ETA requirements, to demonstrate continuous improvement toward ETA endpoints
- **Distributed Energy Resources (DER), Demand Response (DR), Time-of-Use rates (TOU)**. Alex Eubanks (lead), Ramon Alatorre, Brian Turner
    - 3 scenarios plus perhaps a combination scenario: 1) Virtual power plant as a resource, 2) rooftop top solar + managed EV charging + high battery adoption + 44 MW demand

response continued through the planning period, 3) higher behind-the-meter solar adoption in the high growth scenario

- **Geothermal** - lower cost assumptions, full valuation of geothermal benefits. Tom Solomon (lead)
- **ETA without hydrogen or carbon capture sequestration**. Nikhil Kumar and possibly Anna Sommer (leads), Gwen Farnsworth/AnnaLinden Weller, Tom Solomon
    - Either: 1) fully loaded costs added to new gas assets: costs for hydrogen conversion + hydrogen infrastructure + stranded asset risk OR 2) no hydrogen or carbon capture sequestration option in the capacity expansion model
    - Alternative scenario: no new gas allowed in the model for any of the years, including the near-term years of 2029-2032.
- **Fusion** - cost estimates and timing assumptions. Doug Perkins (lead)

SUMMARY AND NEXT STEPS

This summary, the recording, and all other workshop materials are available at the Gridworks Website - PNM IRP (https://gridworks.org/initiatives/pnm-2026-integrated-resource-plan/).

Model Run Requests, even if not fully completed, are due by April 24 at 5 PM MDT via the following form: 2026 Integrated Resource Plan Stakeholder Scenario Request Form – Fill out form. The PNM team will review all ideas submitted by April 24 and will contact requestors between April 24 and May 6 if clarifications or refinements are needed. Stakeholders who would like assistance in filling out the form are encouraged to contact IRP@PNM.com as soon as possible.

Upcoming Workshops and topics are shown below.

Workshop #6, May 13, 9 AM - 12 PM MDT, via Webex PNM will share the list of stakeholder-requested model runs and present any model results to date.
Workshop #7, June 17, 9 AM - 3 PM MDT, as a **hybrid workshop**. In-person attendance is highly recommended, as virtual attendees may have difficulty fully participating. The PNM team will discuss decisions regarding the most cost-effective resource portfolio. All participants will begin conversations regarding the statement of need and action plan.
Workshop #8, July 15, 1 - 5 PM MDT, as a **hybrid workshop**. In-person attendance is highly recommended, as virtual attendees may have difficulty fully participating. Obtain final input from stakeholders regarding the statement of need and action plan.
Workshop #9, August 12, 9 AM - 12 PM MDT, via Webex. Attendees will review final IRP elements, including any unresolved issues.

WORKSHOP #5 PARTICIPATING ORGANIZATIONS (Excluding PNM, its consultants, and facilitators)

350 New Mexico
Advanced Energy United
AES Clean Energy
Ameren – Lucky Corridor
Clean Energy Buyers Association
Clean Energy Coalition of Santa Fe County
Clenera
Coalition for Clean Affordable Energy
Customer (3)
EMNRD
esVolta
Exus Renewables
Form Energy
Gould Law Firm
GridLab
Interwest
New Mexico Gas Co.
NM Affordable Reliable Energy Alliance
NM PRC
NM RETA
Onward Energy
Pacific Fusion
Pattern Energy
Rio Rancho Chamber of Commerce
Sandia National Labs
Senate Energy and Natural Resources Committee
Single Space Strategies
SWEEP
Third Act NM
Tierra Adentro Growth Capital (TAGC)
Vote Solar
Western Environmental Law Center
WRA
Xcel Energy

PNM's 2026 Integrated Resource Plan
Model Results and Implications
Workshop #6 Summary (Corrected 5/19/2026)
May 13, 2026

WORKSHOP SUMMARY

Representatives from 31 stakeholder organizations attended this workshop to discuss PNM's updated base-case modeling efforts and the results of stakeholder-requested model runs. The PNM IRP team presented updated model results, including some modifications to the assumptions presented at the prior workshop.

Over 42 individual stakeholders attended the workshop. The list of participating organizations (excluding PNM, its consultants, and facilitators) is included at the end of this document.

MATERIALS

- **Gridworks' Deck Link:** Gridworks Slide Deck
- **PNM Slide Deck:** PNM-IRP-2026-Workshop-6-2.pdf
- **Background Reading:** Background Reading, SoN and AP
- **Workshop recording:** https://youtu.be/o8w2B2hBTZw

WELCOME AND INTRODUCTION

This workshop had the following objectives:

- Present model results since the prior workshop and discuss possible implications
- Review stakeholder model run requests and results to date
- Prepare stakeholders for Statement of Need and Action Plan conversations

UPDATED BASE CASE MODEL RESULTS

The PNM IRP team presented model results reflecting updates to assumptions since the prior workshop. Updates to the modeling framework and operating parameters included:

- Incorporated transmission cost adders in zonal analysis based on the discussion during the April 20 office hour session.
- Applied end of study period (years 2041-2044) thermal fleet firm-capacity decline to Afton, Luna, Rio Bravo, and Reeves facilities
- Increased the generic solar PV annual capacity factor from 27% to 32% and applied capacity degradation to approved resources for a data center customer
- Revised book life and updated outage rate for pumped hydro, 4hr storage, 8hr storage, and compressed air storage resources
- Corrected extension of existing gas unit operation in "No ETA" scenarios

These updates resulted in no changes to the key trends presented during the prior workshop.
The PNM IRP team also presented results of two sensitivities in the Current Trends and Policies Future. The sensitivities were a low-high gas sensitivity and an extremely high economic development sensitivity.

Both stakeholders and the utility team commented on the productive nature of the dialogue and constructive suggestions offered during the modeling efforts to date.

STAKEHOLDER MODELING RUN REQUESTS - RESULTS TO DATE

The PNM IRP team summarized the stakeholder-requested model run requests. See below.

The PNM team presented the results from 10 stakeholder-requested model runs and described the remaining 4 requests, which are still being finalized.

Stakeholders requested information on these topics:

- Updated model results posted to the Venue site. Note: this was completed on May 13 via the confidential Venue folders.
- ~~PNM's report to the NM PRC regarding the Time of Day (TOD) pilot program. See Heidi Pitt's testimony and attachments PNM Grid Modernization Filing (TOD Pilot) in PNM's Second Annual Grid Modernization Filing, docket number 26-0000069 (pp. 291-426). Exhibit HMP-2 summarizes the Customer Satisfaction Survey report, and Exhibit HMP-4 details the load shifting impact report.~~
- PNM's report to the NM PRC regarding the Time-of-Day (TOD) pilot rates. In PNM's Second Annual Grid Modernization Review Filing, PNM Grid Modernization Filing (TOD Pilot), the current state of the TOD pilot is provided in the Direct Testimony of Heidi Pitts. Topics discussed include customer enrollment, bill guarantee results, energy usage reports and dashboard, and the Roadmap to Default TOD rates. Exhibit HMP-4 is the 2025 load shifting impact report.
- Capacity factor assumptions used for the geothermal-related stakeholder model runs: available via the Venue files, "2026 Facilitated Stakeholder Process >> 1 - Public Modeling data >> 1.1 Generic Resources. Note: PNM is modeling 69% capacity factor for hydrothermal (based on Lightning Dock) and 86% capacity factor for enhanced geothermal (based on a developer's estimates).

The following analyses are pending and will be presented as results become available, either in an office hour session before Workshop #7 or during the next workshop. Pending analyses:

1. Reliability analysis (LOLE of CTP, HEG, others)
2. Remaining stakeholder scenarios
3. Customer impacts for CTP, HEG, LEG
4. Qualitative analysis
5. Determination of Most Cost-Effective Portfolio (MCEP)
6. Draft Statement of Need (SON)
7. Draft Action Plan (AP)

Gridworks described the statement of need and action plan. Further details and links to recent examples from the three NM investor-owned utilities are available here: Background Reading, SoN and AP

STAKEHOLDER QUESTIONS

Gridworks facilitated stakeholder questions at appropriate points throughout PNM's presentations. Most questions focused on clarifying results and improving understanding of key takeaways. Importantly, PNM emphasized that the modeling remains conceptual and is based on generic assumptions. PNM reiterated that the competitive procurement process is the critical phase where decisions regarding specific technologies and projects will ultimately be made.

One outstanding issue for further discussion is how PNM will determine the **most cost-effective portfolio**. Stakeholders asked how this evaluation would be conducted, and PNM acknowledged that defining this approach is a next step in its analysis.

SUMMARY AND NEXT STEPS

This summary, the recording, and all other workshop materials are available at the Gridworks Website - PNM IRP (https://gridworks.org/initiatives/pnm-2026-integrated-resource-plan/).

Upcoming workshops and topics are shown below.

Workshop #7 June 17, 9 AM-3 PM hybrid*	Utility decisions based on modeling results; outline of statement of need and action plan. **LOCATION: CNM Montoya Campus (4700 Morris St. NE, Montgomery and Juan Tabo)**
Workshop #8 July 15, 1-5 PM hybrid*	Complete statement of need and action plan
Workshop #9 Aug. 12, 9 AM-12 virtual	Review key IRP elements, including any unresolved issues

Feedback on Stakeholder Process September	Survey and opportunity for direct feedback are forthcoming. Your input is critical to Gridworks and the NM PRC

*Hybrid Workshop: in-person attendance is strongly advised. Webex links will be available, but may not provide the same participation options as provided to in-person participants.

WORKSHOP #6 PARTICIPATING ORGANIZATIONS (Excluding PNM, its consultants, and facilitators)

350 New Mexico
AES Clean Energy
Bernalillo County Economic Development
Clean Energy Coalition of Santa Fe County
Clenera
Coalition for Clean Affordable Energy
Customer
Deutsch Domestic Water Company, Inc
Energy Futures Group
esVolta
Exus Renewables
Form Energy
Gridlab
Hecate Energy
Interwest Energy Alliance
Jupiter Power
Linea Energy
Navajo Transitional Energy Company (NTEC)
New Mexico Gas Co.
NM Affordable Reliable Energy Alliance
NM EMNRD
NM PRC
NM RETA
Pacific Fusion
Pattern Energy
Sandia National Labs
Single Space Strategies
SWEEP
Third Act NM
Vote Solar
WRA

PNM's 2026 Integrated Resource Plan
Utility Decisions, Statement of Need, and Action Plan
Workshop #7 Summary

WORKSHOP SUMMARY

Representatives from 34 stakeholder organizations attended this workshop to review all modeling efforts completed to date and provide input to PNM on the draft Statement of Need and Action Plan. Over 48 individual stakeholders attended the workshop, 14 of whom attended in person. The list of participating organizations (excluding PNM, its consultants, and facilitators) is included at the end of this document.

MATERIALS

- Gridworks Slide Deck
- PNM Slide Deck
- 2026 PNM IRP Reliability Results - Powergem
- Key Takeaways (E3 Slide Deck)
- PNM Slide Deck - Draft SoN and Action Plan
- 2026 IRP Draft Action Plan
- 2026 IRP Draft Statement of Need
- **Workshop recording:** https https://gridworks.org/wp-content/uploads/2026/06/2026-IRP-Draft-Action-Plan-V1-3.docx://youtu.be/HQS2AlDH334

WELCOME AND INTRODUCTION

This workshop had the following objectives:

- Return to "BIG PICTURE" discussions;
- Present a recap of modeling activities and present SERVM reliability analyses;
- Discuss key takeaways, portfolio direction based on future outcomes, and implications for the statement of need; and
- Review the draft Statement of Need and Action Plan, gather stakeholder feedback, and announce the process for submitting redline edits.

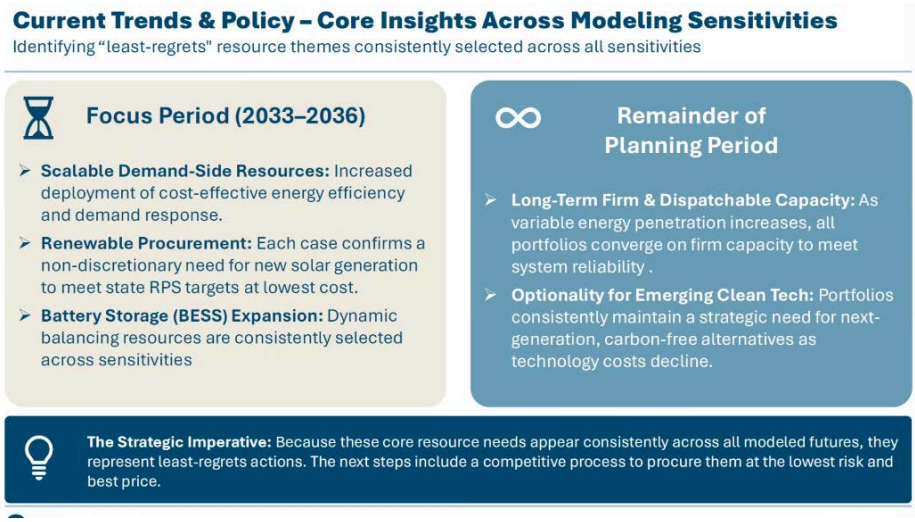
RECAP OF MODELING ACTIVITIES

The PNM team provided a review of all workshops, office hours, and modeling results to date. A gas volatility study is underway. A resiliency report on the Current Trends and Policies (CTP) and High Economic Growth (HEG) futures, as well as for the stakeholder modeling request #12 (described in the PNM Slide Deck from the June 10th Office Hour), is expected soon. Results of these analyses will be made available to stakeholders.

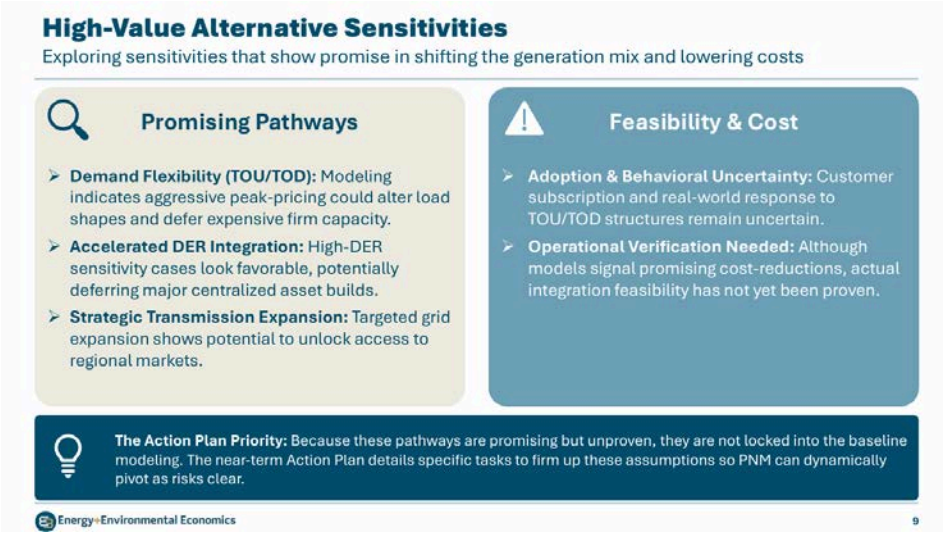
PNM's consultant, PowerGem, reviewed the SERVM-based reliability analyses performed on the CTP and HEG futures for study years 2036, 2040, and 2045. PowerGem concluded that both futures meet reliability requirements.

MODEL RESULTS - KEY TAKEAWAYS

PNM's consultant, E3, described the rationale for presenting a "least regrets" framework of model results as contrasted with a single preferred portfolio for long-term planning. Insights across sensitivities for the Current Trends and Policies Futures are shown below:



Modeling a variety of sensitivities revealed three promising pathways, identified below:



STATEMENT OF NEED AND ACTION PLAN

PNM presented key elements of the draft statement of need and action plan. Stakeholders worked in small groups to generate feedback for the utility on these two important sections of the IRP report. A summary of stakeholder comments is attached. Stakeholders expressed frustration that they received the draft materials on short notice and requested additional time to review the information and consult with colleagues before offering detailed feedback.

NEXT STEPS

- Stakeholder comments on the draft Statement of Need and Action Plan are due to IRP@PNM.com and dshields@gridworks.org by **5 PM MDT on Wednesday, July 1**. Redline edits

and narrative comments are welcome. Links to the two documents can be found here: 2026 IRP Draft Action Plan and 2026 IRP Draft Statement of Need.

- PNM to share gas volatility study
- PNM to share resiliency report, including analyses of CTP, HEG, and stakeholder run request #12
- PNM to share results from customer impact analyses

Upcoming workshops and topics are shown below.

Workshop #8 July 15, 1-5 PM hybrid*	Complete statement of need and action plan
Workshop #9 Aug. 12, 9 AM-12 virtual	Review key IRP elements, including any unresolved issues
Feedback on Stakeholder Process September	A survey and opportunity for direct feedback are forthcoming. Your input is critical to Gridworks and the NM PRC

*Hybrid Workshop: in-person attendance is strongly advised. Webex links will be available, but may not offer the same participation options as those for in-person participants.

GRIDWORKS

WORKSHOP #7 PARTICIPATING ORGANIZATIONS (Excluding PNM, its consultants, and facilitators)

Advanced Energy United
Bernalillo County Economic Development
CABQ
Clenera
Coalition for Clean Affordable Energy
Customers (2)
Deutsch Domestic Water Company, Inc
Energy Futures Group
Energy Futures Group
esVolta
Form Energy
Goschke Energy Advisors
Gould Law Firm
GridLab
Interwest Energy Alliance
Jupiter Power
Kinetic Power, LLC
Linea Energy
New Mexico Gas Co.
NM Affordable Reliable Energy Alliance
NM PRC
Pacific Fusion
Plus Power
Sandia National Labs
Sandia Pueblo
Single Space Strategies
SWEEP
350 New Mexico
Third Act NM
Village of Los Lunas, Economic Development Division
Vote Solar
Walmart
WRA
Zanskar Geothermal & Minerals

GRIDWORKS

PNM 2026 IRP, Workshop #7, June 17, 2026

Initial Stakeholder Feedback on Draft Statement of Need and Action Plan

Statement of Need

- Provide energy amounts (MWh) in addition to capacity position (MW) (tables 1 and 2)
- 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
- Clearly describe what is in the baseline and the relationship to current procurement activities
- Break down expected load growth into segments (data centers, large loads, residential electrification, etc.)
- More information on affordability and customer impacts of each scenario
- 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)
- Define short-duration storage, 4hr versus 8hr discharge rates, and applications
- 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
- Explain how PNM is thinking about hydrogen conversion, infrastructure costs, and deliverability uncertainty
- Provide examples of emerging resources
- Explain where/how stakeholder input and requested modeling runs are reflected in PNM's analysis, and how stakeholder input impacted PNM's identified need
- Explain how demand-side management is included in an all-source solicitation

Action Plan

- Commit to a large load tariff that includes financial assurances and protections for existing customers
- #3 – Work with developers and the Commission to consider alternative RFP structures (tiered or phased)
- #4 – add "public and private" partnerships and accelerate work on this to take advantage of the next legislative session
- #7 – Need specific targets, programs, and metrics for energy efficiency and demand-side management
- #8 – Identify specific goals for smart meter implementation, data-informed program development, and customer communication plans
- Commit to RFP criteria that prioritize technologies with tax credits
- Add specific time frames for action plan items

Format and Structure

- Bullet points, key takeaways, graphics, and summary conclusions are preferred over lengthy text
- A non-technical audience should be able to understand the key points
- Be more specific in targets and actions; clearly defined boundaries so it is evident if/when a material event is triggered
- Add a section describing the impact of stakeholder input

PNM's 2026 Integrated Resource Plan
Statement of Need and Action Plan Review
Workshop #8 Summary

WORKSHOP SUMMARY

Representatives from 27 stakeholder organizations attended this July 15, 2026, workshop to review all modeling efforts completed to date and provide input to PNM on the draft Statement of Need and Action Plan. Over 37 individual stakeholders attended the workshop, 7 of whom attended in person. The list of participating organizations (excluding PNM, its consultants, and facilitators) is included at the end of this document.

MATERIALS

- Gridworks Slide Deck
- PNM Modeling Update Slide Deck
- PNM Statement of Need & Action Plan Slide Deck
- Revised PNM Statement of Need
- Revised PNM Action Plan
- Gas Volatility Analysis
- PNM SoN and Action Plan Feedback Tracker
- Workshop recording: https://youtu.be/s9iWSjAG-GM

WELCOME AND INTRODUCTION

The workshop objectives were to review the Statement of Need and Action Plan, hear how stakeholder input was considered, and assess the level of agreement with these two elements of the IRP.

UPDATE ON MODELING ACTIVITIES

The PNM team shared the results of the reliability analysis for stakeholder-requested scenario #12 and the revised results for the High and Extreme Economic Growth scenarios. The gas volatility study is complete and available here: Gas Volatility Analysis. Key takeaways from the revised High Economic Growth reliability analysis, which increased the accredited capacity for energy-limited resources, indicated a need for fewer firm-dispatchable and carbon-free resources compared to the results presented in May. The analysis indicated a need for more dynamic balancing resources in the Extreme Economic Growth situation.

STATEMENT OF NEED AND ACTION PLAN

The PNM team summarized the revised Statement of Need (SoN) and Action Plan (AP), which were sent to stakeholders and posted on the Gridworks website on July 9. Stakeholder comments from Workshop #7 and seven sets of written comments submitted by July 2 were considered by the utility team while developing these revised documents. Disposition of all comments is shown in the PNM SoN and Action Plan Feedback Tracker.

PNM discussed Action Plan item #4, a proposed emerging technology working group, as critical to developing emerging clean energy resources in New Mexico. PNM proposed to form a working group to evaluate strategic public and private partnerships, policies, and funding mechanisms or tax credits, including new state and federal incentives, to support the deployment of emerging clean energy resource developments. Several stakeholders offered connections and possible allies in this endeavor.

STAKEHOLDER FEEDBACK ON REVISED STATEMENT OF NEED AND ACTION PLAN

Stakeholders were invited to respond to the questions below regarding the Statement of Need (SoN). (Results of the polling are included with each question. There were 10 responses.)

- Do you agree with the **amount and types of resources** PNM needs to reliably meet customer demand and state policies during 2026-2045? Results: 60% YES, 40% NO.
- Do you agree that the SoN includes the **technical characteristics** of any proposed new resources to be procured, **expressed in terms of energy or capacity**? Results: 60% YES, 40% NO.
- Do you feel that the SoN takes a **broad view** of the evolving needs of the system? Results: 80% YES, 20% NO.

Concerns mentioned by individual respondents include:

- ➢ A desire for more definition on customer outreach and communications efforts related to the smart meter rollout and the transition to time-of-day rates.
- ➢ Skepticism about the durability of data center load growth. Request for a breakdown of the load forecasts by sector.
- ➢ Opposition to including nuclear as a resource option.
- ➢ Opposition to including gas as a resource; need to avoid stranded assets.
- ➢ Accessibility of the SoN to non-technical audiences.
- ➢ Request for an overview/appendix/summary table of emerging technology resource options.
- ➢ Inclusion of a description of a large load tariff and implications for resource planning.
- ➢ Correction to a statement related to fusion technology.

The team noted that some information requested by stakeholders during the SoN discussion will be included in other chapters of the IRP report.

Stakeholders were also invited to respond to the questions below regarding the Action Plan: (Results of the polling are included with each question. There were 6 responses.)

- Do you agree that the Action Plan includes specific steps over the next 3 years to implement the resource plan? Results: 67% YES, 33% NO.
- Do you agree that the Action Plan details specific actions to develop any resource solicitation or contracting activities to fulfill the statement of need? Results: 83% YES, 17% NO.
- Does the plan include the issuance of a status report of actions contained in the 2023 IRP Action Plan? Results: 83% YES, 17% NO.

Issues voiced by respondents include:

- ➢ Lack of assurance that all IRP participants will receive regular updates on the Action Plan.
- ➢ Lack of a commitment to a distributed energy resources roadmap or enabling of Community Solar, customer-sited generation and storage, microgrids, and virtual power plants (VPPs).
- ➢ Lack of a commitment to developing an open-access Grid Services Tariff.

NEXT STEPS
PNM will develop the full IRP report and intends to share a draft with stakeholders for informational purposes prior to Workshop #9.

Across the full body of stakeholder feedback received to date, two remain as open items:

- Evaluation of affordability, customer impacts, and revenue requirements for each tier of resources
- Evaluation of transmission options: WestTEC corridors that affect PNM, flow-based operations

Workshop #9 is scheduled for **Aug. 12 from 9 AM - 12 NOON MDT** via WebEx. (Gridworks apologizes for the error in the workshop time that was announced during Workshop #8.) This workshop will focus on the IRP content and include an invitation to provide feedback on the stakeholder engagement process.

WORKSHOP #8 PARTICIPATING ORGANIZATIONS (Excluding PNM, its consultants, and facilitators)

350 New Mexico
Advanced Energy United
City of Albuquerque
Clean Energy Coalition of Santa Fe County
Coalition for Community Solar Access
Customers (2)
Energy Futures Group
Exus Renewables
Form Energy
Gridlab
Gould Law Firm
Interwest Energy Alliance
Invenergy
Kinetic Power, LLC
New Mexico Gas Co.
NM Affordable Reliable Energy Alliance
NM PRC
NM RETA
Pacific Fusion
Pattern Energy
SWEEP
Third Act NM
Tierra Adentro Growth Capital
TransAlta
WRA
Xcel Energy

PNM's 2026 Integrated Resource Plan
IRP Review and Process Feedback
Workshop #9 Summary

WORKSHOP SUMMARY

Representatives from 24 stakeholder organizations attended this August 12, 2026, workshop to receive an update on the PNM IRP Report and learn about changes made to the Statement of Need since the prior workshop. 31 stakeholders attended the virtual workshop. The list of participating organizations (excluding PNM, its consultants, and facilitators) is included at the end of this document.

MATERIALS

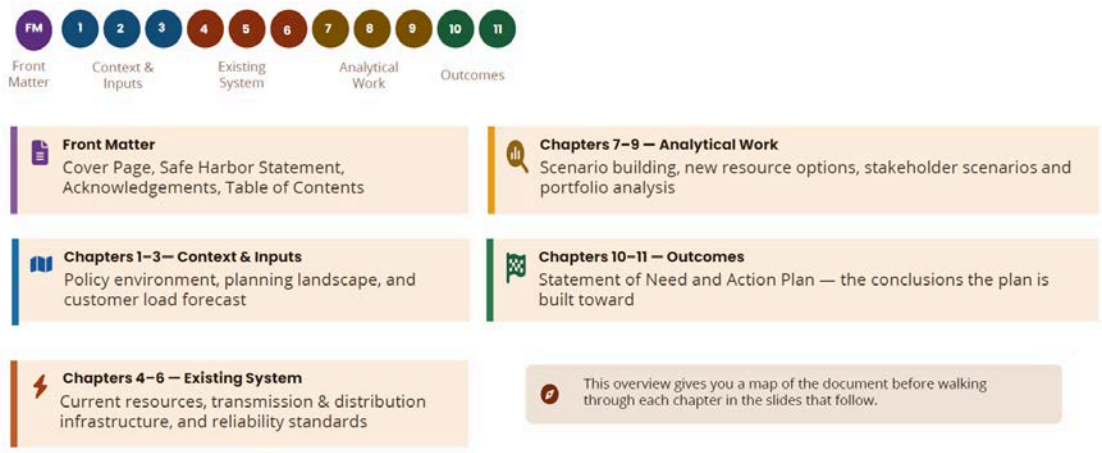
- **Gridworks Slide Deck**
- **PNM Slide Deck**
- **Updated SoN, Chapter 10**
- **Preliminary PNM 2026 IRP Draft Report**
- **Workshop recording:** https://youtu.be/ai_mOV7k9JY

WELCOME AND INTRODUCTION

The workshop objectives were to understand key elements of the IRP report, review updates to the Statement of Need since the last workshop, review the main themes that surfaced during the 9-month stakeholder engagement process, and invite feedback on this process as input for the facilitator's report to the NM Public Regulation Commission. Gridworks expressed appreciation to all stakeholders who participated in this process, noting that 44 individuals attended 6 of the 16 stakeholder gatherings to date.

IRP REPORT CONTENT

The PNM team shared the organization of the IRP report and identified sections that were influenced by stakeholder engagement. A copy of the draft report was distributed to stakeholders on Aug. 6: Preliminary PNM 2026 IRP Draft Report. The report structure is as follows:



The PNM team shared an analysis of possible customer cost impacts across the three analyzed scenarios (Current Trends and Policies, High Economic Growth, and Low Economic Growth).

Stakeholder questions focused on the load forecast under record-heat conditions, planned resource additions (including transmission assets), assumptions about hydrogen costs, flexible data center interconnections, rate impacts, overlap with the distribution system planning process, and the relationship between current and planned resource acquisition activities.

UPDATED STATEMENT OF NEED

The PNM team presented updated ranges of resources needed for the CTG, stakeholder-defined, LEG, and HEG scenarios. These updates were made to align with results of the modeling runs and were shared with stakeholders in an updated Statement of Need document, distributed on Aug. 10, Updated SoN, Chapter 10. Changes between the July and August versions for the CTG scenario are illustrated below.

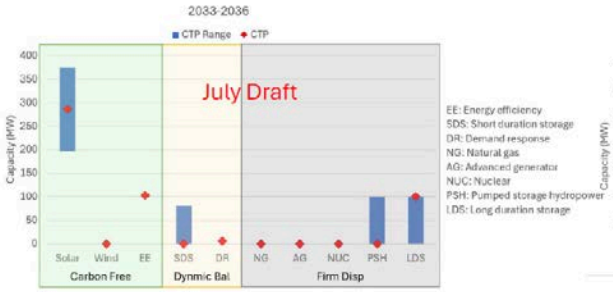


Table 4 – Incremental Installed Capacity Resource Needs Based on CTP Future and Sensitivities

Incremental to 2029 Baseline

Resource Category	Through 2036		Through 2045	
	Low	High	Low	High
Carbon-Free Energy (Supply-Side)	~~196~~ 360	~~374~~ 598	~~657~~ 1,144	~~1,533~~ 1,409
Carbon-Free Energy (Demand-Side)	~~103~~ 196	~~103~~ 196	~~327~~ 420	~~327~~ 420
Dynamic Balancing (Supply-Side)	0	~~80~~ 0	517	~~883~~ 768
Dynamic Balancing (Demand-Side)	~~6~~ 15	~~6~~ 45	~~10~~ 19	~~12~~ 52
Firm Dispatchable (Supply-Side)	0	200	~~584~~ 863	~~2,208~~ 1,602

IRP KEY TAKEAWAYS

The Statement of Need and Action Plan contain key results from the modeling efforts and stakeholder discussions. In addition, the following takeaways were noted:

- There are limited resource needs through 2036, depending on the load
- For the next IRP, expand potential modeling sensitivities for the late 30's and beyond to provide better insight into options and challenges to complete the path to a zero-carbon portfolio
- Continue work advancing Integrated System Planning concepts
- Enhance information on demand-side program possibilities and potential

ACTION ITEMS FOR PNM

- Share resource adequacy/weather resiliency study (by PowerGem)
- Incorporate results of stakeholder scenarios #10-13 into IRP report
- Add transmission addition (2029-2032 resource filing) to IRP report

NEXT STEPS

The IRP Resource Adequacy Analysis will be included as an appendix to the IRP Report. The final version of the IRP Report will also be made available to stakeholders through Gridworks' communications.

Public comments on the IRP Report are allowed up to 30 days after the Sept. 1 filing date via NM PRC's docket number 25-00022-UT. PNM has 60 days after filing to respond to public comments, and then the NM PRC staff and commission will conduct their review and acceptance process.

Stakeholders are invited to provide feedback to Gridworks on the stakeholder engagement process by Sept. 4. This feedback is critical to the facilitator's report to the NM PRC and vital to improving New Mexico's electric utilities' planning process. Feedback is welcome via a survey (see the QR code and link below), and/or via a direct conversation with the Gridworks team.

https://forms.gle/pr9x2uQZ6c31VGk77

WORKSHOP #9 PARTICIPATING ORGANIZATIONS (Excluding PNM, its consultants, and facilitators)

Advanced Energy United
AES Clean Energy
Black Forest Partners
City of Albuquerque
CDG Engineers
Clean Energy Coalition of Santa Fe County
Clenera
Coalition for Community Solar Access
Customer
Gould Law Firm
Gridlab
Interwest Energy Alliance
Invenergy
Linea Energy
New Mexico Gas Co.
NM Affordable Reliable Energy Alliance
NM PRC
NM RETA
Pacific Fusion
Sandia Pueblo
Vote Solar
Western Resource Advocates
Zanskar Geothermal & Minerals

APPENDIX D: 2023 IRP FSP AND 2026 IRP FSP FEEDBACK

1 2023 IRP FILED COMMENTS

Appendix D provides the disposition of material issues raised during the facilitated stakeholder process and identifies whether each issue was adopted, adopted in part, not adopted, deferred, or remains unresolved, together with PNM's rationale and the resulting effect, if any, on the Statement of Need or Action Plan.

In keeping with the transparency aspect of the new IRP Rule, a series of comments were filed in public in Docket No. 23-00409-UT regarding the filed 2023 IRP report. Although none of the comments PNM agreed to adopt required an amendment of the 2023 IRP, many of the responses improved the overall process and clarity for stakeholders. These comments were adopted to help improve the IRP process, augment stakeholder transparency, and increase stakeholder understanding of how PNM determines the Statement of Need, the Action Plan and ultimately the IRP report. The table below summarizes all stakeholder feedback that PNM agreed to from the 2023 IRP filed comments. Responses to these comments as well as information was provided throughout the 2026 IRP FSP process in various workshops, office hours or directly in the 2026 IRP report. A summary of these comments as well as PNM's response are provided below.

TABLE D-1. 2023 FILED IRP COMMENTS/FEEDBACK

#	Topic	Comment/Feedback	Response	2026 IRP Status
1	IRP Process	Provide a better understanding of how TOU rates implementation/customers' electricity usage behaviors impacts	Adopted	Completed, arranged for SME's to discuss with interested stakeholders in breakout session in Workshop #7; also provided multiple PNM filings regarding these programs to all stakeholders via the Venue site. PNM's website (pnm.com) also provides substantial information on TOU/TOD rates for customers
2	IRP Process	Provide a better understanding concerning "Behind the meter" data collection	Adopted	Completed, arranged for SME's to discuss with interested stakeholders in breakout session in Workshop #7; also provided multiple PNM filings regarding these programs to all stakeholders via the Venue site
3	IRP Process	Provide analysis of impact of distributed generation with local storage backup	Adopted	Provided analysis in stakeholder scenarios #5, 6, 7, 11 and 12 from Workshop #6, additional write up in IRP report stakeholder scenario section
4	IRP Process	Develop and include an overview/table of generating resources	Adopted	Completed; Provided in Workshop #2 and 2026 IRP report

#	Topic	Comment/Feedback	Response	2026 IRP Status
5	RFP Process	Present a clear process for the RFP	Adopted	Completed; Provided an overview in Workshop #8 on how the SoN is used to provide direction in RFP requests. Provided procurement timeframes in Appendix P
6	Modeling	Provide more clarity from the beginning for the process about what scenarios and sensitivities PNM plants to model	Adopted	Completed; Overview in Workshop #3 on February 11, 2026. PNM followed up in Workshop #4 in March 2026 and Workshop #5 in April 2026.
7	Modeling	Perform an ELCC study for thermal generation	Adopted	Completed; Presented study scope to solicit stakeholder input in February 2026. Receiving none, PNM proceeded with the scope as presented. Results were uploaded on Venue on 3/19/26 and PNM provided update in Workshop #3.
8	Modeling	Include a detailed study of gas price volatility	Adopted	Completed; Presented study scope to solicit stakeholder input in February 2026. Receiving none, PNM proceeded with the scope as presented. Study was uploaded on Venue on 7/7/26. Result summary provided in Workshop #8 and summarized in the 2026 IRP report, Section 8.9.
9	Transmission	Provided detailed information regarding regional transmission planning	Adopted	Summarized in the 2026 IRP report, Section 2.4
10	Transmission	Provide potential expansions of transmission connectivity to other utilities and analysis	Adopted	Completed, PNM explicitly analyzed four transmission alternatives for the 2026 IRP report, Section 5.8
11	Modeling	Analyze information regarding advanced transmission technologies and grid-enhancing technologies	Adopted	PNM provided additional GETs information, uploaded to the Venue site on March 5, 2026 and a full write up is in the 2026 IRP report, Section 5.1
12	Modeling	Alignment of EE bundles and PNM EE programs	Adopted	Completed; Included a description of updated methodology in Section 3.4 and Section 8.1 of the 2026 IRP Report
13	IRP Report	Clearly articulate how federal rebates and tax credits reduce costs of different resources	Adopted	Completed; Included how federal incentives if applied were used to reduce costs of technologies in Section 8 of the 2026 IRP report
14	Modeling	Expand modeling sensitivities regarding electrification	Adopted	PNM performed sensitivities that expanded the modeling for electrification though high electric vehicle adoption. Sensitivity results provided during the FSP in Workshops #5 and #6 and in the 2026 IRP Report in Section 9

#	Topic	Comment/Feedback	Response	2026 IRP Status
15	IRP Report	Specifically Identify all Resources Chosen in the MCEP	Adopted	Provided in the 2026 IRP report in Appendix N

2 2026 IRP FSP Frequent Themes

The 2026 IRP FSP spanned over nine months solicitating stakeholder feedback on many aspects of PNM's triennial IRP planning process. Over the course of the facilitated process, there were a series of topics that were frequently raised by participants and discussed multiple times. Some of these matters could impact future IRPs and therefore do not have immediate solutions. Other comments point to areas PNM could improve upon in future IRP cycles. Although these themes were discussed over multiple workshops with multiple stakeholders; no specific conclusion could be agreed upon. These topics also warrant more time to satisfactorily address and understand all the implications than the few months of time allotted for the FSP to investigate a solution. Other topics while not directly impacting PNM's SoN or the AP for this IRP were either addressed or resolved during the workshops or office hour meetings. These topics, listed in no particular order are discussed below.

2.1 Data Center Load Growth, Forecasting, & Customer Protections

Early in the process, stakeholders expressed concern over the scale, timing, and uncertainty of economic development load growth projections. Stakeholders cited project timing, infrastructure demands, and the risk that existing retail customers could bear stranded costs for speculative loads. Requests for load breakdown, the evaluation process to determine if loads were tangible were continually vocalized. To assuage the concern associated with this type of load growth, PNM provided supplemental forecast details multiple times and had SMEs on hand during multiple meetings to respond to any questions. In addition, PNM modeled multiple load forecasts as well as stakeholder-requested model runs were performed. Finally, PNM committed to filing a formal large-load tariff to provide financial assurances and ratepayer protections and Gridworks directed stakeholder interest to the NMPRC forum which began during this process to discuss utility options for large load tariffs and its implications. Although the current 2026 IRP process cannot fully address this topic during the FSP, PNM is actively participating in this regulatory process and will provide follow-up information in its action plan status updates.

2.2 Energy Transition Act (ETA) Compliance vs. New Natural Gas Generation

During the FSP, some stakeholders questioned PNM's reliance on new natural gas combustion turbines (CTs) as a future candidate resource, raising concerns about alignment with ETA mandates (100% carbon-free by 2045). Doubts centered on gas price volatility, pipeline infrastructure, stranded asset risk, and the technical and economic viability of green hydrogen conversion given shifting federal funding. Participants also strongly objected to PNM's 2029-2032 System Resources filing which included requested approval of one small gas facility to PNM's portfolio.

Prudent planning requires PNM to be technology agnostic and to ensure all feasible technologies are evaluated on a level playing field. To that end, PNM incorporated hydrogen conversion costs,

completed a natural gas volatility study, modeled a no-ETA comparison sensitivity, and executed stakeholder runs evaluating decarbonization without hydrogen, carbon capture, or new gas. For modeling purposes, PNM assumed all new natural gas resource candidates included the cost of conversion equipment needed to burn hydrogen beginning in 2045. Further, for hydrogen fuel pricing there was no use of federal funding or incentives used to reduce overall costs and only renewable resources would be used to provide the energy needed for a hydrogen production processing facility. In essence, PNM fully burdened this candidate resource type with substantial capital and operating costs when competing with all other candidate technologies. PNM contracted with Siemens to perform a natural gas volatility study to understand the implications of natural gas price spikes. PNM approached hydrogen conversion without a bias relying heavily on industry experts to provide guidance on the feasibility of conversion and the infrastructure needed to have a clean burning fuel. This same approach was undertaken in the 2029-32 Resource Plan for gas resources.

2.3 Nuclear as a Candidate Resource

In long-term capacity expansion modeling, the model consistently selected new nuclear resources late in the planning period in order to meet firm dispatchable resource needs and to support 100% carbon free mandated energy production by 2045. Reaction to these results incited strong opposition and vocalizing safety/waste concerns. Stakeholder opposition to nuclear as an acceptable candidate resource was discussed and repeated,

PNM clarified that nuclear was included purely as a generic proxy resource for firm capacity in the long-term expansion model and would require significant screening and evaluation before it had the ability to become a selection. Additionally, PNM emphasized that resource procurement is not a function of the IRP facilitated stakeholder process. Specifically, the IRP identifies three areas of need: carbon free resources, dynamic balancing resources and firm generating resources. To model in IRP, PNM uses generic feasible technologies to serve as proxies. Specific technology identification to meet the needs as shown in the Statement of Need is determined though market solicitations and analyses. Although the IRP and resource procurement through an RFP are inextricably linked, the IRP does not prescribe exact technologies but serves to provide direction and magnitude while fully expecting specific technology types would be vetted through a subsequent procurement process. Additionally, the timing of nuclear resource additions in PNM's 2026 IRP modeling were in the 2040's, which on the early side, is 14 years into the future. PNM plans to monitor long lead-time technologies such as nuclear, in addition to emerging technology maturity to determine if, and when, such technologies could assist PNM meeting customer requirements while considering reliability, affordability and environmental impacts.

2.4 Distributed Energy Resources (DERs), Virtual Power Plants (VPPs), & Demand Response

Some stakeholders asked that PNM consider expanding its options for customer-sited resources (rooftop solar, batteries, electric vehicles, demand response) and treat such options as dispatchable resources. Stakeholders pressed for PNM to commit to a more explicit DER roadmap, community solar enablement, microgrids, and an open-access Grid Services Tariff.

Consistent with recognition from Gridworks to this topic, PNM modeled stakeholder-requested DER sensitivities, including a VPP scenario which was a combined simulation featuring high rooftop solar, high Time-of-Use rate adoption, behind-the-meter batteries, and additional demand response. However, during final Action Plan reviews, stakeholders expressed that the plan still lacked explicit commitments or policy targets for a DER roadmap. PNM did not agree with specific stakeholder commitments as PNM has already implemented or plans to implement some of these programs/projects, such as VPP, whole house EV pilot program and Commission-approved distribution sited BESS.

2.5 Costing & Integration of Emerging Clean Energy Technologies (Geothermal, LDES, & Fusion)

A dominant topic in the 2026 IRP FSP was a greater inclusion of emerging clean technologies, specifically enhanced geothermal, long-duration energy storage (LDES), and nuclear fusion, arguing that initial generic cost and performance assumptions undervalued their potential as firm clean power compared to fossil resources. For geothermal specifically, stakeholders questioned generic capital cost estimates, questioned capacity factor assumptions, and requested tailored RFP bid language to accommodate the longer development lead times of enhanced geothermal systems.

To address this concern, PNM held dedicated office hours (including a March 4 session on geothermal costs), updated capacity factor assumptions, and executed stakeholder-requested model runs across multiple price points for geothermal and nuclear fusion. While specific RFP bid language and contracting terms were deferred to the post-IRP competitive procurement process, PNM committed to creating an Emerging Technology Working Group in Action Plan Item #4 to evaluate public-private partnerships, federal/state tax incentives, and deployment opportunities that would support this technology. The focus of the working group will include identifying potential solutions to challenges of seeking emerging and long-lead technologies under the current RFP processes outlined in the IRP rule.

2.6 Reliability & Resource Adequacy Modeling

Although there were not any specific issues that arose in the FSP workshops regarding PNM's reliability and resource adequacy planning, stakeholders sought assurance that proposed candidate portfolios would maintain system reliability under high load growth and severe weather, particularly with increased reliance on energy-limited renewables and storage.

PNM through its consultant (PowerGEM) completed SERVM probabilistic reliability modeling across Current Trends and Policies (CTP) and High Economic Growth (HEG) futures. SERVM analyses confirmed that the CTP and HEG portfolios met reliability standards, with some accredited capacity adjustments iterated for the HEG portfolio to align with PNM's 1-day-in-10-years planning standard. While evaluated portfolio reliability was not debated, stakeholders continued to express concerns regarding the specific resource mix used to achieve it. Additionally, PNM performed a resiliency study to evaluate how CTP and HEG portfolios perform under extreme summer and winter weather events, both under standard interconnected operations and an islanded sensitivity. System resiliency was also evaluated to determine daily risk by season,

the impact of firm dispatchable capacity on resiliency and performance of different technology types under extreme conditions.

2.7 Transmission Constraints & Market Opportunities

Stakeholders highlighted the complexity of PNM's system. PNM's wholesale transmission business exceeds the amount of PNM's utilization of transmission for retail customers planned for in the IRP. As a result, PNM's transmission utilization is more than double the amount of PNM's peak retail load. The wholesale transmission business must be considered in the ability of the transmission system to deliver resources identified in the IRP to PNM's retail load. Stakeholders urged PNM to capture the benefits of joining the Extended Day Ahead Market (EDAM) in 2027 and regional transmission expansion. Previous work and stakeholder comments from the 2023 IRP encouraged PNM to expand modeling of the transmission system in its IRP. In response to stakeholder comments, PNM expanded its IRP modeling to include transmission project analysis of four transmission path sensitivities derived from its 20-Year Transmission plan with the intent to explore whether market related benefits could be obtained from these potential transmission related interconnections. While this work is still ongoing, PNM recognizes there is still work to be performed in this area and plans to perform additional analysis regarding these potential projects prior to or as part of the 2029 IRP. Evaluating broader regional transmission options (such as WestTEC corridors and flow-based operations) as requested in the FSP was cited as potential options for improving the work PNM has accomplished in PNM's next IRP.

2.8 Customer Bill Impacts, Affordability, & Revenue Requirements

Stakeholders requested transparent data showing how candidate resource portfolios and economic growth futures would translate into customer rate impacts, overall revenue requirements, and energy affordability.

PNM identified an MCEP as the CTP baseline case, as well as resource plans under varying key supply- and demand-side assumptions. System average rate impacts for CTP, HEG, and LEG futures were presented to stakeholders in PNM's August Workshop #9. Average rate impacts for the last year (2036) of the 2026 IRP focus period reflected cost impacts for each portfolio, providing the estimated incremental revenue requirements and energy requirements above a baseline set by PNM's 2029-2032 Resource filing illustrative rates.

2.9 Relationship Among IRP, Current Procurements, & Future RFPs

Stakeholders expressed confusion regarding overlapping proceedings (such as PNM's 2029-2032 resource filing, the supplemental RFP and future resource filing), how existing baseline procurements were treated, and whether a 3-year Action Plan provided sufficient lead time for large-scale or emerging clean energy additions. PNM clarified that portfolios identified by capacity expansion tools used generic, conceptual resources, whereas specific projects and commercial technologies were chosen later through a competitive procurement process. Stakeholders were also concerned about timing of RFP needs, noting that emphasis should be adjusted to accommodate long-lead time resources. To satisfy stakeholders, the Statement of Need and Action Plan were explicitly revised to account for better transparency and document the timeframes for each period and show how all PNM procurements (current and future) are aligned.

PNM agreed with stakeholders on long-lead times for RFP's and resource procurements, thus why PNM's 2026 IRP is focusing on resources needed to serve system needs for the forward looking 7-10 years.

2.10 Behind the meter (BTM) & Time-of-Day (TOD) Rates

A single stakeholder raised questions regarding customer data privacy, rate choice, and the need for public education and communication plans to support the transition to default TOD rates following full smart meter deployment by 2028–2029. For this IRP, PNM shared many updates and filings that PNM has made regarding its grid modernization plan, including TOD pilot customer satisfaction reports and load-shifting data. In addition, PNM provided opportunities for stakeholders to have access to PNM's SMEs multiple times in various meetings in the effort to increase customer understanding of these programs, designs and future plans. Although many of these programs are still in their infancy and plans are not completely established, it was requested that the final Action Plan include more concrete customer outreach strategies, metrics, and implementation goals. PNM provides substantial information on its website (pnm.com) on TOD rates and customer choice options and believes this is a standard way for customer communications with today's audiences. PNM implements the latest and best practices in customer privacy protection in the systems implemented for AMI and Grid Modernization data collection. PNM considers its website an important element of customer communication and will evaluate additional communication channels as program design and deployment milestones are established.

2.11 Modeling Access, Transparency, & Stakeholder Process

Early in the FSP, some stakeholders experienced frustration regarding delayed access to model inputs, software licenses, workpapers, and raw data files. To address this concern, PNM established a centralized site for modeling data and other information on the VENUE platform. PNM held more than five dedicated office hours for Q&A, extended review periods, and collaborated with stakeholders to execute and present results for 12 stakeholder-requested model runs.

PNM made all software database inputs and outputs available to stakeholders once data was ready for sharing. A modeling access form was provided to stakeholders early in the process. For those that were interested, the form was to be completed and emailed to PNM. PNM then validated the request and provided access to PNM's VENUE platform for access to inputs and outputs for all modeling performed by PNM. Most modeling input data, modeling framework, load forecast data and zonal output data such as resource information and simulation results were provided to any stakeholders requesting access. For stakeholders that requested detailed software modeling inputs, a confidentiality form was also provided to any stakeholder that requested this type of access. This allowed those stakeholders to perform their own modeling using the same database of information PNM used in the 2026 IRP. For the 2026 IRP, PNM noted that the nodal model inputs contained proprietary data and included NERC CIP protected data which required stakeholders to demonstrate the ability to meet FERC requirements to access such data.

3 2026 IRP FSP Statement of Need/Action Plan Feedback

As part of the 2026 IRP FSP process PNM presented a draft SoN and AP to solicit feedback from participants. Over the course of two workshops, PNM gathered over 70 comments, suggestions and redlines for both documents. Table D-2 summarizes all comments PNM received via workshop, through Gridworks or via email. PNM's response to each is also found in the table.

Table D-2 - 2026 IRP FSP Statement of Need/Action Plan Comments

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 publicaly coordinated in other forums.

Table D-2 - 2026 IRP FSP Statement of Need/Action Plan Comments

Issue Number	Status	Description	Category	Date Reported	Respondent	Comments
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 Moderization 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

Table D-2 - 2026 IRP FSP Statement of Need/Action Plan Comments

Issue Number	Status	Description	Category	Date Reported	Respondent	Comments
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 2029-20232 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

Table D-2 - 2026 IRP FSP Statement of Need/Action Plan Comments

Issue Number	Status	Description	Category	Date Reported	Respondent	Comments
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 (GWhs) 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

Table D-2 - 2026 IRP FSP Statement of Need/Action Plan Comments

Issue Number	Status	Description	Category	Date Reported	Respondent	Comments
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

Table D-2 - 2026 IRP FSP Statement of Need/Action Plan Comments

Issue Number	Status	Description	Category	Date Reported	Respondent	Comments
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 26-0000039-UT demonstrates PNM's CO2 compliance. Duplication in the action plan is unneccasry.
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 Moderinzation including AMI implementation, additional DR programs and energy efficiency initiatives, expanding on these is not warrented.
55	Closed	New item, demand-side resources capacity accreditation. PNM will publish for stakeholder comment, its capacity accreditation method for demand-side resources. Too 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 beleive a separate action item is warrented. The IRP report includes information on ELCC methodology and calculations used for resource planning purposes which will be availabe 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 encourage to provide comments during the RFP commentary period.

Table D-2 - 2026 IRP FSP Statement of Need/Action Plan Comments

Issue Number	Status	Description	Category	Date Reported	Respondent	Comments
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.

Table D-2 - 2026 IRP FSP Statement of Need/Action Plan Comments

Issue Number	Status	Description	Category	Date Reported	Respondent	Comments
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	Closed	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	This has been incorporated into the IRP report.
72	Closed	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	Action plan modified to incorporate WestTEC and flow-based assessment.

APPENDIX E: ADDITIONAL DETAILS ON PNM'S EXISTING GENERATION

In accordance with the IRP Rule, this appendix provides detailed characteristics of our existing generation resources.

- Table E-1 Provides information on current PVNGS ownership shares
- Table E-2 Provides information on current FCPP ownership shares
- Table E-3 Highlights thermal resource operational characteristics
- Table E-4 Reviews the ongoing costs associated with existing resources
- Table E-5 Shows a ten-year historical look at PNM wind performance
- Table E-6 Summarizes solar resources within PNM's portfolio
- Figure E-1 Shows solar capacity growth
- Table E-7 Provides a general characteristic of storage resources within PNM's portfolio
- Figure E-2 Shows storage resources over time
- Table E-8 Summarizes PPA and ESA annual costs
- Table E-9. General characteristics of Peak Saver and Power Saver
- Table E-10. General characteristics of PNM's Triennial filing energy efficiency programs

NUCLEAR

Palo Verde Nuclear Generating Station (PVNGS)

The Palo Verde Nuclear Generating Station (PVNGS) is PNM's only nuclear generating resource and provides 288 MW of carbon-free capacity to the Company's generation portfolio. Located approximately 50 miles west of Phoenix, Arizona, the three-unit facility is operated by Arizona Public Service Company (APS) on behalf of the plant's seven co-owners. Commercial operation began between 1986 and 1988, and the units are licensed by the U.S. Nuclear Regulatory Commission to operate through 2045 (Unit 1), 2046 (Unit 2), and 2047 (Unit 3).

PNM's ownership interest is distributed across all three generating units and currently consists of 30 MW in Unit 1, 124 MW in Unit 2, and 134 MW in Unit 3. The ownership interests of all participating utilities are summarized in Table E-1.

TABLE E-1. CURRENT PVNGS OWNERSHIP SHARES (NET DEPENDABLE SUMMER CAPACITY)

Owner	Unit 1 (MW)	Unit 2 (MW)	Unit 3 (MW)	Percentage
Arizona Public Service	382	382	382	29.1%
Salt River Project	333	240	230	20.4%
El Paso Electric	207	208	207	15.8%
Southern California Edison	207	208	207	15.8%
Public Service Co of New Mexico	**30**	**124**	**134**	**7.3%**
So. Cal. Public Power Assoc.	77	78	77	5.9%
Los Angeles Dept. of Water & Power	75	75	75	5.7%
Total	**1,311**	**1,314**	**1,312**	**100.0%**

PNM's current ownership reflects the completion of a multi-year transition associated with historical lease arrangements. Portions of Units 1 and 2 were previously subject to sale/leaseback financing agreements, under which PNM reacquired 154 MW of owned capacity while allowing the remaining leased interests to expire in 2023 and 2024. As a result, PNM's ownership interest decreased from 402 MW, as reported in the 2023 IRP, to the current 288 MW. The remaining ownership interests are expected to remain available through the expiration of each unit's operating license.

APS is responsible for nuclear fuel procurement on behalf of the owners. Fuel supply is secured through long-term agreements covering uranium concentrate, conversion, enrichment, and fuel fabrication services with multiple qualified suppliers, providing diversity in the fuel supply chain and reducing procurement risk.

Energy from PVNGS is delivered to PNM's service territory using jointly owned transmission facilities together with contracted transmission rights. PNM expects these transmission arrangements, along with existing fuel procurement practices, to continue supporting reliable operation of the facility throughout the planning horizon.

COAL

Four Corners Power Plant (FCPP)

The Four Corners Power Plant (FCPP) is a two-unit, coal-fired generating facility located on the Navajo Nation near Fruitland, New Mexico. Units 4 and 5 are operated by Arizona Public Service Company (APS) on behalf of the plant's owners. Coal for the facility is supplied from the adjacent Navajo Mine, which is owned by Navajo Transitional Energy Company (NTEC). The current coal supply agreement extends through 2031.

PNM has owned an interest in FCPP since acquiring a 13% share of Units 4 and 5 in 1969 and 1970. PNM's ownership totals 200 MW of net dependable summer capacity. Current ownership shares for the facility are summarized in Table E-2.

TABLE E-2. CURRENT FCPP OWNERSHIP SHARES (SUMMER NET DEPENDABLE CAPACITY)

Owner	Unit 4 (MW)	Unit 5 (MW)	Total (MW)	Percentage
Arizona Public Service	485	485	970	63%
Public Service Co of New Mexico	**100**	**100**	**200**	**13%**
Salt River Project	77	77	154	10%
Tucson Electric Power	54	54	108	7%
Navajo Transitional Energy Company	54	54	108	7%
Total	**770**	**770**	**1,540**	**100%**

Power generated by FCPP is delivered to PNM's service territory through the Company's transmission system. In addition to providing dispatchable generation, the facility has historically contributed to resource adequacy and operational flexibility during periods of high customer demand.

Following the retirement of the San Juan Generating Station in 2022, FCPP became PNM's only remaining coal-fired generating resource and the largest source of direct carbon emissions within the Company's generation portfolio. Under the Energy Transition Act, electric utilities must comply with increasingly stringent emissions limitations beginning in 2032. Based on the evaluation following the 2023 IRP, the abandonment of its ownership interest in FCPP following expiration of the existing coal supply agreement (July 2031) is currently pending before the NM PRC (Docket No. 26-0000114).

Although PNM plans to exit ownership of the generating units in 2031, the Company expects to retain certain transmission-related facilities associated with the site that are necessary to maintain reliable operation of the transmission system. These retained facilities are not part of the proposed abandonment of the generating assets.

The Four Corners facility is governed through a series of agreements among the co-owners, including co-tenancy, operating, coal supply, and lease agreements. The coal supply agreement expires in 2031, while the underlying land leases extend beyond plant operations to provide for

decommissioning activities. Under the existing agreements, PNM's responsibility for mine reclamation is limited to its proportionate share of the required reclamation funding established under the coal supply agreement.

NATURAL GAS

Afton Generating Station

The Afton Generating Station (Afton) is a 235 MW natural gas-fired combined-cycle generating facility located near La Mesa, New Mexico. The plant entered commercial operation in 2007 and consists of a General Electric (GE) Frame 7 combustion turbine, a heat recovery steam generator, and a steam turbine. Afton can operate in either simple-cycle or combined-cycle mode, providing operational flexibility to support a range of system conditions. Afton is assumed to be available with PNM's portfolio through its planned retirement year, 2042. For modeling purposes, PNM assumed that Afton would be capable of prolonging its planned retirement by a couple of years to reach the end of 2044. This assumption will be re-evaluated in the following IRP (2029).

Located within PNM's southern service territory, Afton serves both local and system-wide reliability needs. The facility can deliver energy to customers in southern New Mexico and, through existing transmission arrangements, to load centers in northern New Mexico. Natural gas is supplied via the El Paso Natural Gas Company's southern mainline, providing access to regional fuel supplies.

La Luz Energy Center

The La Luz Energy Center (La Luz) is a 41 MW natural gas-fired simple-cycle generating facility located in Valencia County near PNM's Belen Substation, west of Albuquerque. Placed in service in 2016, it is the newest thermal generating resource in PNM's portfolio and consists of a single GE LM6000 aeroderivative combustion turbine. La Luz is assumed to be available in PNM's portfolio through its planned retirement year, 2055 and is expected to be converted to burn hydrogen fuel by 2045.

La Luz is strategically located within the Albuquerque load pocket, where it provides fast-start generation and operating reserves to support system reliability. The facility is capable of reaching full output in approximately 10 minutes, enabling it to respond quickly to changing system conditions, fluctuations in customer demand, and variability in renewable generation. The unit is equipped with selective catalytic reduction and carbon oxidation systems to reduce air emissions during operation.

Natural gas is supplied to the facility through the Transwestern pipeline system, with additional access to the nearby El Paso Natural Gas interstate pipeline network. The aeroderivative turbine technology also provides operational flexibility that may support the use of lower-carbon fuels such as hydrogen.

Lordsburg Generating Station

The Lordsburg Generating Station (Lordsburg) is an 86 MW natural gas-fired simple-cycle peaking facility located near Lordsburg, New Mexico. The plant entered commercial operation in 2002 and consists of two GE LM6000 aeroderivative combustion turbines that provide fast-start,

dispatchable generation to support system reliability. For modeling purposes, PNM assumed that Lordsburg units would be capable of prolonging its planned retirement by a couple of years to reach the end of 2044 and are expected to be converted to burn hydrogen fuel by 2045.

Located within PNM's southern service territory, Lordsburg provides peaking capacity, operating reserves, and load-following capability during periods of high demand and changing system conditions. Energy generated at the facility can serve customer load in southern New Mexico or be delivered to northern New Mexico through existing transmission arrangements. Natural gas is supplied via the El Paso Natural Gas Company's southern mainline, and the aeroderivative turbine technology provides operational flexibility that may support the future use of lower-carbon fuels as those technologies become commercially viable.

Luna Energy Facility

The Luna Energy Facility (Luna) is a 190 MW natural gas-fired combined-cycle generating resource located near Deming, New Mexico. Commissioned in 2006, the facility consists of two GE 7FA combustion turbines, each paired with a heat recovery steam generator, and is jointly owned by PNM, Tucson Electric Power, and Samchully Power & Utilities 1, LLC, with each owner holding a one-third interest. PNM assumes that Luna will be available through its planned retirement year, 2042. Luna operates exclusively in combined-cycle mode, providing efficient, dispatchable generation to support system reliability. For modeling purposes, PNM assumed that Luna would be capable of prolonging its planned retirement by a couple of years to reach the end of 2044. This assumption will be re-evaluated in the following IRP (2029).

Energy produced from PNM's ownership share can be delivered directly to customers in southern New Mexico or, through existing transmission arrangements, to load centers in northern New Mexico. Natural gas is supplied via the El Paso Natural Gas Company's southern mainline, with each co-owner responsible for procuring its own fuel supply.

Reeves Generating Station

The Reeves Generating Station (Reeves) is a 146 MW natural gas-fired steam generating facility located in central Albuquerque. The plant consists of three steam turbine units, Units 1, 2, and 3, that are 42, 41, and 63 MW, respectively. The units entered commercial operation between 1960 and 1962 and Units 1 and 2 were upgraded in 2010 and 2011. Natural gas is supplied by the New Mexico Gas Company.

Reeves plays an important role in maintaining reliable electric service within the Albuquerque load pocket by providing dispatchable generation, voltage support, and operational flexibility while helping to alleviate local transmission constraints. As one of the few generating resources located within the metropolitan area, the facility continues to provide essential reliability services that support operation of the transmission system. As discussed in Section 4.1.3 of the 2026 IRP report, the findings from the Reeves analysis supported the decision to incorporate the Reeves extension as a resource until 2044 in PNM's 2026 IRP.

Rio Bravo Generating Station

The Rio Bravo Generating Station (Rio Bravo) is a 149 MW natural gas-fired simple-cycle generating facility located in south Albuquerque. The plant consists of a GE 7FA combustion

turbine that entered commercial operation in 2000 and was acquired by PNM in 2013 following approval by the NMPRC.

Located within the Albuquerque load pocket, Rio Bravo provides dispatchable generation that supports local reliability by helping relieve transmission constraints, maintain system operating criteria, and provide voltage support. The facility is designed for dual-fuel operation, using natural gas supplied by the New Mexico Gas Company as its primary fuel and fuel oil stored on-site as a backup fuel source when needed. As a load-side generating resource, Rio Bravo continues to play an important role in supporting reliable operation of PNM's transmission system and serving customer demand. Rio Bravo's operational term extends through November 2040. For modeling purposes, PNM assumed that Rio Bravo would be capable of prolonging its planned retirement by some years to reach the end of 2044. This assumption will be re-evaluated in the following IRP (2029).

Valencia Energy Facility

The Valencia Energy Facility (Valencia) is a natural gas-fired simple-cycle generating facility located south of Belen, New Mexico, within PNM's northern load pocket. The facility consists of a GE 7FA combustion turbine that entered commercial operation in 2008. PNM purchases the plant's output under a long-term power purchase agreement (PPA) with Onward Energy. In 2025, the NMPRC approved an extension of the PPA from 2028, the expiration in the original PPA, through 2039. The NMPRC also approved an increase in PNM's contracted capacity from 155 MW to 167 MW starting in June 2028. Valencia provides dispatchable peaking capacity and operational flexibility to support reliability in the Albuquerque load area, while natural gas is supplied through a dedicated pipeline interconnection with Transwestern's interstate pipeline system. Table E-3 and E-4 show the thermal resources operating characteristics and costs.

TABLE E-3 THERMAL RESOURCES OPERATIONAL CHARACTERISTICS

Thermal Resources	Heat Rate at Max Output (Btu/kWh)	Forced Outage Rate (%)	Accredited Capacity (%)	CO2 Rate (lbs/MWh)	SO2 Rate (lbs/MWh)	NOx Rate (lbs/MWh)	Water Usage (gal/MWh)	Coal Ash Rate (lbs/MWh)	Nameplate Capacity (MW)
COAL									
Four Corners Unit 4	9,650	20	72	1,963	.505	.655	584	253	100
Four Corners Unit 5	9,650	20	72	2,029	.505	.655	584	253	100
NUCLEAR									
Palo Verde Unit 1	10,300	2	94	-	-	-	19	-	30
Palo Verde Unit 2	10,300	2	94	-	-	-	19	-	124
Palo Verde Unit 3	10,300	2	94	-	-	-	19	-	134
NATURAL GAS									
Afton Generating Station	7,680	2	92	926	.005	.18	92	-	235
La Luz Gas Turbine	9,747	8.7	98	1,121	.007	.25	44.5	-	41
Lordsburg Generating Station Unit 1	9,885	4.3	98	1,117	.008	1.07	250.6	-	43
Lordsburg Generating Station Unit 2	9,890	4.8	98	1,180	.005	.80	250.6	-	43
Luna Energy Facility	7,621	3	92	817	.002	.04	184	-	190
Reeves Generating Station Unit 1	12,057	3.3	92	1,452	.009	3.39	897	-	42
Reeves Generating Station Unit 2	11,851	3.3	92	1,495	.007	2.89	897	-	41
Reeves Generating Station Unit 3	11,583	3.3	92	1,424	.007	2.89	897	-	63
Rio Bravo Gas Turbine	10,619	5.4	98	1,367	.008	.44	7.8	-	149
Valencia Energy Facility	10,234	3.3	98	1,410	.010	.40	22.4	-	155

TABLE E-4. ONGOING COSTS ASSOCIATED WITH EXISTING RESOURCES ($MILLIONS)

Fuel Costs ($ millions)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Palo Verde	18.5	17.4	19.2	20.2	21.3	22.7	23.5	22.9	24.5	25.6	25.4	27.0	28.1	27.4	29.1	30.7	30.4	32.3	33.5	30.7
Four Corners	39.0	39.6	42.4	45.0	47.9	16.7	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fixed O&M Costs ($ millions)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Palo Verde	51.4	54.8	54.3	55.3	59.3	58.6	55.9	57.4	58.8	60.1	61.5	63.0	64.6	66.1	67.7	69.4	71.1	72.9	74.7	76.5
Four Corners	20.9	21.4	23.5	21.8	21.3	11.6	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Afton	12.7	12.5	23.1	12.6	12.8	15.0	15.4	15.7	16.0	16.4	16.8	17.3	17.7	18.2	18.7	19.9	20.4	20.9	21.5	22.0
La Luz	1.6	1.7	1.8	1.8	1.8	1.7	1.7	1.8	1.8	1.8	1.9	1.9	1.9	2.0	2.0	2.1	2.1	2.1	2.2	2.2
Lordsburg	3.1	3.4	3.6	3.6	3.7	3.5	3.6	3.6	3.7	3.7	3.8	3.9	3.9	4.0	4.1	4.2	4.3	4.3	4.4	4.5
Luna	10.1	9.8	10.2	10.0	10.1	9.9	10.0	10.2	10.4	10.6	10.7	10.9	11.1	11.3	11.6	12.6	12.9	13.2	13.6	13.9
Reeves	7.9	8.2	8.4	8.6	8.9	9.1	9.2	9.5	9.7	10.0	10.2	10.5	10.8	11.1	11.4	11.7	12.0	12.3	12.6	0.1
Rio Bravo	3.0	2.4	2.8	2.9	5.5	3.2	3.3	3.4	3.5	3.5	3.6	3.7	3.8	3.9	4.0	4.1	4.2	4.3	4.4	4.5
Valencia	23.7	24.0	20.8	18.4	18.6	18.8	19.0	19.2	19.4	19.6	19.8	20.0	20.2	20.4	-	-	-	-	-	-
PNM-Owned Solar	4.4	4.5	5.0	5.3	5.4	5.6	5.7	5.9	6.1	6.2	6.4	6.6	6.8	7.0	7.2	7.4	7.6	7.8	8.0	8.3
Annual Revenue Requirement ($ millions)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Palo Verde	56.4	57.2	58.1	59.0	59.9	61.5	62.8	64.1	65.5	72.8	73.9	74.9	76.0	76.9	90.2	89.9	89.7	89.4	88.9	141.2
Four Corners	22.1	22.4	22.6	22.7	23.3	18.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Investment Recovery	-	-	-	-	-	-	11.2	11.5	11.7	11.9	12.1	12.3	12.5	12.7	12.9	13.1	13.3	13.5	13.7	13.9
Afton	21.9	21.4	22.0	22.3	20.8	20.3	20.0	19.8	19.5	20.2	19.8	19.5	19.1	18.7	21.3	20.6	20.5	19.9	18.8	28.8
La Luz	5.9	6.0	5.8	5.6	5.1	5.1	5.1	5.1	5.0	5.3	5.2	5.1	5.0	4.9	4.8	5.4	5.3	5.1	4.8	2.5
Lordsburg	5.3	5.8	6.0	5.8	5.5	5.4	5.6	5.7	5.8	6.7	6.8	6.9	7.0	7.0	7.2	9.4	9.4	9.4	9.1	7.8
Luna	9.9	9.9	9.7	10.3	11.2	11.3	11.6	11.9	12.2	13.8	14.0	14.3	14.6	14.8	15.0	19.0	19.1	19.1	18.5	22.4
Reeves	11.2	10.9	10.5	11.5	8.8	11.5	12.9	12.6	13.0	18.7	19.3	18.5	17.6	16.5	18.2	17.3	16.1	15.0	13.8	0.4
Rio Bravo	6.8	7.0	7.2	7.0	7.1	8.1	8.6	9.0	9.4	11.7	12.0	12.2	12.5	12.7	16.1	16.2	16.3	16.4	15.9	15.6

GEOTHERMAL

Dale Burgett Geothermal Plant

The Dale Burgett Geothermal Plant is an 11 MW geothermal generating resource located in the Animas Valley of Hidalgo County, approximately 20 miles southwest of Lordsburg, New Mexico. PNM purchases the facility's energy and associated RECs under a long-term PPA with Zanskar Geothermal & Minerals. The facility reached its full 11 MW capacity in 2018. The current PPA is set to expire in March 2042.

The plant uses a closed-loop binary-cycle process that transfers heat from geothermal groundwater to a secondary working fluid to generate electricity before reinjecting the geothermal fluid back into the underground reservoir. This process enables continuous generation while minimizing emissions and conserving the geothermal resource through reinjection of the produced fluids.

WIND

New Mexico Wind Energy Center (NMWEC)

The New Mexico Wind Energy Center (NMWEC) is PNM's longest-serving wind resource and has supplied renewable energy to the Company's portfolio since 2003. PNM purchases the energy and associated RECs generated by the 200 MW facility from NextEra Energy, Inc. NMWEC is located near House, New Mexico and interconnects with PNM's transmission system at the Taiban Mesa Substation on the Blackwater–Clines Corners 345-kV line. In 2019, the project was repowered with upgraded turbine technology, increasing annual energy production, and PNM extended its PPA through 2043.

Red Mesa Wind Energy Center

Red Mesa Wind Energy Center (Red Mesa) provides 102 MW under a long-term PPA with NextEra Energy, Inc. PNM began purchasing energy and associated RECs in 2015 and the 20-year PPA is scheduled to expire at the end of 2034. Red Mesa is located in Cibola County, New Mexico and is interconnected to PNM's 115-kV transmission system at the Red Mesa Substation.

Casa Mesa Wind Project

The Casa Mesa Wind Project (Casa Mesa) added 50 MW of wind generation to PNM's portfolio in 2018 under a long-term PPA with NextEra Energy, Inc. The 25-year PPA is scheduled to expire in 2043. Located in eastern New Mexico in De Baca and Quay Counties, the project shares a transmission interconnection with the adjacent NMWEC. Because both facilities utilize the same point of interconnection, their combined output is limited to 200 MW.

La Joya Wind Projects

PNM has two separate long-term PPAs for the projects with Avangrid Renewables that expire in 2041. The La Joya 1 and La Joya 2 Wind Projects (La Joya Wind Projects) represent the newest operating wind resources in PNM's existing portfolio. The projects are 166 MW and 140 MW, respectively, totaling 306 MW. The projects are both located in Torrance County, New

Mexico. While both facilities contribute carbon-free energy to PNM's portfolio, the output and RECs from La Joya 1 support voluntary customer renewable energy programs and therefore do not count as an RPS-eligible resource for compliance with the ETA. La Joya 2 supplies retail customers and provides RECS that contribute to PNM's ETA compliance.

Historical operating data provides additional insight into the long-term performance of PNM's wind portfolio. Historic performance has varied due to a number of factors, including prevailing weather conditions, the 2019 repowering of the New Mexico Wind Energy Center (NMWEC), and the advent of newer projects such as Casa Mesa and La Joya with advanced turbine technologies.

Palomas

To be located within San Miguel and Torrance County. Palomas is an 800 MW wind generation facility that is currently pending NMPRC approval in PNM's 2029-2032 system resource application and therefore is not considered an existing resource within PNM's portfolio until 2029. If approved, the project would expand PNM's carbon-free energy portfolio and further diversify the company's renewable resource mix throughout the planning horizon.

Table E-5 below shows a ten-year summary of energy generation and capacity factors for each of PNM's wind resources.

TABLE E-5. TEN-YEAR HISTORY OF PNM'S WIND RESOURCE PERFORMANCE

Energy (GWh)	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Casa Mesa	-	-	-	187,441	187,442	191,070	163,498	177,759	182,195	180,605
La Joya 1	-	-	-	-	-	560,453	555,817	611,121	550,144	494,483
La Joya 2	-	-	-	-	-	384,857	446,022	464,478	439,440	402,901
NMWEC*	492,427	496,778	485,108	610,138	573,382	611,353	577,112	582,838	546,202	504,921
Red Mesa	214,030	215,606	212,754	220,073	230,275	196,105	197,568	199,437	160,464	163,215
Total	**706,457**	**712,384**	**697,862**	**1,017,652**	**991,099**	**1,943,838**	**1,940,017**	**2,035,633**	**1,878,445**	**1,746,125**
Capacity Factor (%)	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**
Casa Mesa	-	-	-	43%	43%	44%	37%	41%	42%	41%
La Joya 1	-	-	-	-	-	39%	38%	42%	38%	34%
La Joya 2	-	-	-	-	-	31%	35%	38%	36%	33%
NMWEC[1]	28%	28%	28%	35%	33%	35%	33%	33%	31%	29%
Red Mesa	24%	24%	24%	25%	26%	22%	22%	22%	18%	18%
Average	**27%**	**23%**	**23%**	**33%**	**32%**	**34%**	**33%**	**35%**	**33%**	**30%**

Notes
1. Increased output from NMWEC in 2019 due to repowering

SOLAR

The expansion of PNM's solar portfolio has occurred through a series of Commission-approved resource procurements and competitive solicitations, resulting in the addition of utility-scale solar facilities across New Mexico. Table E-6 highlights the general characteristics of solar resources within PNM's portfolio, and Figure E-1 summarizes the growth in installed and

committed solar PV capacity over time and illustrates the increasing role of solar generation within PNM's resource portfolio.

TABLE E-6. GENERAL CHARACTERISTICS OF PNM'S SOLAR RESOURCES (EXISTING, APPROVED, PENDING)

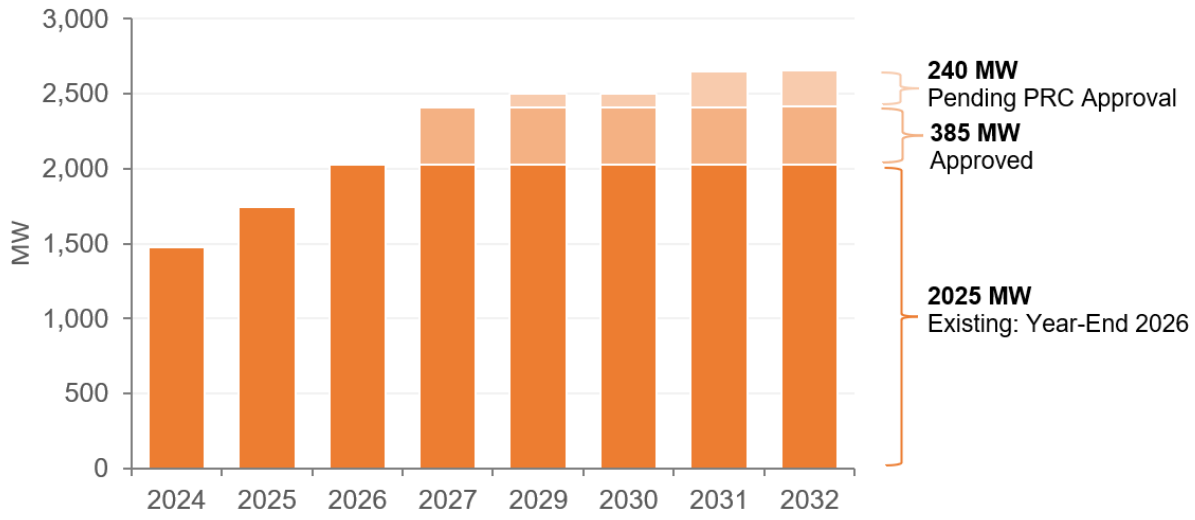
Solar Resources	Status	County	State	First Year	Last Year	Nameplate Capacity (MW)
OWNED						
Alamogordo Solar	Existing	Otero	NM	2011	2041	5
Albuquerque Solar Energy Center (Reeves)	Existing	Bernalillo	NM	2011	2041	2
Cibola Solar	Existing	Cibola	NM	2015	2035	8
Deming Solar	Existing	Luna	NM	2011	2041	9
Las Vegas Solar	Existing	San Miguel	NM	2011	2041	5
Los Lunas Solar	Existing	Valencia	NM	2011	2041	7
Manzano Solar	Existing	Valencia	NM	2013	2043	8
Meadow Lake Solar	Existing	Valencia	NM	2014	2045	9
Otero Solar	Existing	Otero	NM	2013	2043	8
Prosperity Solar	Existing	Bernalillo	NM	2011	2041	1
Rio Communities Solar	Existing	Valencia	NM	2015	2045	10
Rio Del Oro Solar	Existing	Valencia	NM	2019	2049	10
Rio Rancho Solar	Existing	Bernalillo	NM	2019	2049	10
San Miguel 1 Solar	Existing	San Miguel	NM	2019	2049	10
San Miguel 2 Solar	Existing	San Miguel	NM	2019	2049	10
Sandoval Solar	Existing	Sandoval	NM	2014	2044	6
Santa Fe Solar	Existing	Santa Fe	NM	2015	2045	9
Santolina Solar	Existing	Bernalillo	NM	2015	2045	11
South Valley Solar	Existing	Bernalillo	NM	2015	2045	10
Sunbelt Solar	Approved	San Juan	NM	2027	2047	100
Vista Solar	Existing	Valencia	NM	2019	2049	10
PPA						
Arroyo Solar	Existing	McKinley	NM	2024	2044	300
Atrisco Solar	Existing	Bernalillo	NM	2024	2044	300
Britton Solar	Existing	Torrance	NM	2019	2044	50
Cat Hills Solar	Pending	Valencia	NM	2030	2050	150
Community Solar Phase 1	Existing	Various	NM	2026	2046	117
Community Solar Phase 2	Approved	Various	NM	2027	2049	185
Encino North Solar	Existing	Sandoval	NM	2023	2043	50
Encino Solar	Existing	Sandoval	NM	2020	2045	50
Facebook 1 Solar	Existing	Valencia	NM	2017	2042	10
Facebook 2 Solar	Existing	Bernalillo	NM	2018	2043	10
Facebook 3 Solar	Existing	Bernalillo	NM	2018	2043	10
Four Mile Solar	Approved	San Juan	NM	2027	2047	100
Jicarilla Solar 1	Existing	Rio Arriba	NM	2023	2043	50
Jicarilla Solar 2	Existing	Rio Arriba	NM	2022	2037	50

Solar Resources	Status	County	State	First Year	Last Year	Nameplate Capacity (MW)
Quail Ranch Solar	Existing	Bernalillo	NM	2025	2045	100
Route 66 Solar	Existing	Cibola	NM	2022	2047	50
San Juan Solar	Existing	San Juan	NM	2024	2044	200
Sky Ranch Solar	Existing	Valencia	NM	2024	2044	190
Star Light Solar	Existing	Valencia	NM	2026	2046	100
TAG Solar I	Existing	Sandoval	NM	2025	2045	140
Wild Cat Solar	Pending	McKinley	NM	2029	2049	90
Windy Lane Solar	Existing	De Baca	NM	2026	2046	90
					Subtotal, Solar (Existing)	**2,025**
					Subtotal, Solar (Approved)	**385**
					Subtotal, Solar (Pending)	**240**
					Total, Solar (Existing, Approved, Pending)	**2,650**

Notes

1. Community Solar: Comprises multiple solar facilities, including both operational and planned projects. A total of 117 MW is expected to be operational by year-end 2026. Phase 1 is expected to reach 125 MW, while Phase 2 is anticipated to begin commercial operation in 2027 and expand to 185 MW by year-end 2029.
2. Windy Lane and Starlight are classified as existing resources due to their expected commercial operation by the end of 2026.

FIGURE E -1. SOLAR CAPACITY GROWTH



ENERGY STORAGE

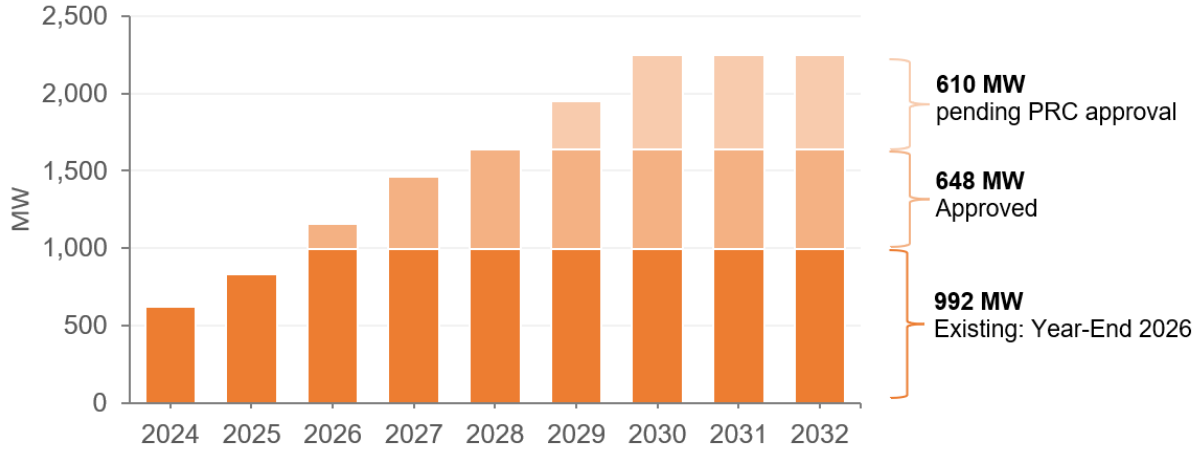
Large utility-scale battery energy storage was first added to PNM's portfolio in 2023 with the commercial operation of the Arroyo Battery Energy Storage System (150 MW) and the Jicarilla I Battery Energy Storage System (20 MW). These projects demonstrated the operational benefits of pairing battery storage with large-scale solar generation by enabling renewable energy to be stored and dispatched to better align with customer demand.

Since bringing these first two projects online, PNM has significantly expanded its battery energy storage portfolio through a series of Commission-approved resource procurements and competitive solicitations. New standalone and co-located battery storage facilities have been developed to support renewable integration, improve system flexibility, and maintain reliability as the Company's generation portfolio transitions toward carbon-free resources. Table E-7 summarizes the existing and future development of individual storage projects, while Figure E-2 illustrates the growth of battery energy storage capacity within PNM's portfolio over time.

TABLE E-7. GENERAL CHARACTERISTICS OF PNM'S STORAGE RESOURCES (EXISTING, APPROVED, PENDING)

Energy Storage Resources	Status	County	State	First Year	Last Year	Nameplate Capacity (MW)
OWNED						
Distribution Storage	Existing	Various	NM	2024	2044	12
Distribution Storage	Approved	Various	NM	2027	2047	30
Sandia Storage	Existing	Bernalillo	NM	2026	2046	60
Sunbelt BESS	Approved	San Juan	NM	2027	2047	50
PPA						
Arroyo Storage	Existing	McKinley	NM	2023	2043	150
Atrisco Storage	Existing	Bernalillo	NM	2024	2044	300
Britton BESS	Pending	Torance	NM	2029	2049	60
Cat Hills BESS	Pending	Valencia	NM	2031	2051	150
Corazon Storage	Approved	Bernalillo	NM	2027	2047	150
Encino BESS	Pending	Sandoval	NM	2029	2049	110
Four-Mile Mesa Storage	Approved	San Juan	NM	2027	2047	100
Gila Monster BESS	Pending	Sandoval	NM	2031	2051	150
Jicarilla Storage	Existing	Rio Arriba	NM	2023	2043	20
Quail Ranch Storage	Existing	Bernalillo	NM	2026	2045	100
Route 66 Storage	Existing	Cibola	NM	2025	2047	50
San Juan Storage	Existing	San Juan	NM	2024	2044	100
Sky Ranch II Storage	Existing	Valencia	NM	2025	2044	100
Sky Ranch Storage	Existing	Valencia	NM	2024	2044	50
Star Light Storage	Approved	Valencia	NM	2026	2046	100
Sun Lasso Storage	Approved	Bernalillo	NM	2028	2048	150
TAG I Storage	Existing	Sandoval	NM	2025	2045	50
TAG II BESS	Pending	Sandoval	NM	2029	2049	90
Wildcat BESS	Pending	McKinley	NM	2029	2049	50
Windy Lane Storage	Approved	De Baca	NM	2026	2046	68
					Subtotal, Storage (Existing)	**992**
					Subtotal, Storage (Approved)	**648**
					Subtotal, Storage (Pending)	**610**
					Total, Storage (Existing, Approved, Pending)	**2,250**

FIGURE E-2. ENERGY STORAGE IN PORTFOLIO OVER TIME



The following table, Table E-8 presents the annual costs associated with power purchase agreements and energy storage agreements for existing and approved resources. These costs reflect the contractual obligations associated with the resources over the planning period.

TABLE E-8. ANNUAL COSTS OF PPA & ESA RESOURCES

PPA Cost – Wind ($ millions)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Casa Mesa	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	4.2	0.0	0.0
La Joya 1	15.3	15.3	15.3	15.3	15.3	15.3	15.3	15.3	15.3	15.3	15.3	15.3	15.3	15.3	15.3	1.3	0.0	0.0	0.0	0.0
La Joya 2	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	4.0	-	-	-	-
Lone Mesa (NMWEC)	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	16.7	12.6	-	-
Red Mesa	7.4	7.6	7.7	7.9	8.1	8.2	8.4	8.6	8.7	-	-	-	-	-	-	-	-	-	-	-
Palomas[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PPA Cost – Solar ($ millions)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Arroyo Solar	13.2	13.1	13.0	12.9	12.8	12.7	12.6	12.6	12.5	12.4	12.3	12.2	12.1	12.0	12.0	11.9	11.8	11.7	1.0	-
Atrisco Solar	20.9	20.8	20.6	20.5	20.3	20.2	20.1	19.9	19.8	19.6	19.5	19.4	19.2	19.1	19.0	18.8	18.7	18.6	15.4	-
Britton Solar	4.2	4.2	4.2	4.1	4.1	4.1	4.0	4.0	4.0	4.0	3.9	3.9	3.9	3.8	3.8	3.8	3.7	3.7	3.7	-
Cat Hills Solar[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	--	-	-	-	-	-	-
Encino North Solar	3.4	3.4	3.3	3.3	3.3	3.3	3.3	3.3	3.2	3.2	3.2	3.2	3.2	3.2	3.1	3.1	3.1	2.1	-	-
Encino Solar	4.3	4.2	4.2	4.2	4.2	4.1	4.1	4.1	4.0	4.0	4.0	3.9	3.9	3.9	3.9	3.8	3.8	3.8	3.7	1.9
Four-Mile Solar	-	-	11.5	11.5	11.5	11.4	11.4	11.3	11.2	11.1	11.0	11.0	10.9	10.8	10.7	10.7	10.6	10.5	10.4	10.4
Jicarilla Solar 1	2.6	2.6	2.6	2.6	2.6	2.5	2.5	2.5	2.5	2.5	2.5	2.4	2.4	2.4	2.4	2.4	2.4	2.3	1.7	-
Jicarilla Solar 2	2.5	2.5	2.5	2.4	2.4	2.4	2.4	2.4	2.4	2.3	2.3	0.8	-	-	-	-	-	-	-	-
NMRD Solar	3.2	3.1	3.1	3.1	3.1	3.1	3.0	3.0	3.0	3.0	2.9	2.9	2.9	2.9	2.9	2.8	2.8	0.9	-	-
Quail Ranch Solar	8.2	8.1	8.1	8.0	8.0	7.9	7.9	7.8	7.8	7.7	7.6	7.6	7.5	7.5	7.4	7.4	7.3	7.3	7.2	5.4
Route 66 Solar	3.6	3.6	3.5	3.5	3.5	3.5	3.4	3.4	3.4	3.4	3.3	3.3	3.3	3.3	3.2	3.2	3.2	3.2	3.1	3.1
San Juan Solar	18.9	18.9	18.8	18.7	18.6	18.5	18.4	18.3	18.2	18.1	18.0	17.9	17.8	17.8	17.7	17.6	17.5	17.4	15.9	-
Sky Ranch Solar	12.2	12.2	12.1	12.0	12.0	11.9	11.9	11.8	11.8	11.7	11.6	11.6	11.5	11.5	11.4	11.3	11.3	11.2	2.8	0.0
Star Light Solar	-	10.4	10.4	10.3	10.3	10.2	10.2	10.1	10.1	10.0	10.0	9.9	9.9	9.8	9.8	9.7	9.7	9.6	9.6	9.6
TAG Solar I	12.2	12.1	12.0	11.9	11.8	11.7	11.6	11.6	11.5	11.4	11.3	11.2	11.1	11.0	11.0	10.9	10.8	10.7	10.6	7.0
Wild Cat Solar[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Windy Lane Solar	-	9.8	9.8	9.8	9.7	9.7	9.6	9.6	9.5	9.5	9.4	9.4	9.3	9.3	9.3	9.2	9.2	9.1	9.1	9.0
PPA Cost - Geothermal ($ millions)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Dale Burgett	7.2	7.4	7.6	7.8	8.0	8.2	8.4	8.6	8.8	9.0	9.2	9.5	9.7	9.9	10.2	10.4	10.7	-	-	-

PPA Cost - Natural Gas ($ millions)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Valencia Energy Facility	23.7	24.0	20.8	18.4	18.6	18.8	19.0	19.2	19.4	19.6	19.8	20.0	20.2	20.4	-	-	-	-	-	-

ESA Cost - Storage ($ millions)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Arroyo Storage	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	13.4	-
Atrisco Storage	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3	31.3
Britton BESS[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cat Hills BESS[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Corazon Storage	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4
Encino BESS[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Four-Mile Storage	-	-	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8	17.8
Gila Monster BESS[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Jicarilla Storage	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	8.0	-	-
Quail Ranch Storage	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3	14.3
Route 66 Storage	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1
San Juan Storage	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	16.8	15.4	-
Sky Ranch II Storage	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	-	-
Sky Ranch Storage	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	9.4	2.4	-
Star Light Storage	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2
Sun Lasso Storage	-	-	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3	18.3
TAG I Storage	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	4.4
TAG II BESS[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Wildcat BESS[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Windy Lane Storage	-	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4	11.4

Notes

1. Pending approval at the NMPRC

Demand Side Resources

Tables E-9 and E-10 summarize the general characteristics of the demand response and energy efficiency resources currently included in PNM's portfolio, including key program attributes, availability, and operational considerations. For modeling purposes in IRP, demand response and energy efficiency program impacts were initially based on the Energy Efficiency and Demand Response Potential Study conducted by ICF for 2026 through 2045. Throughout the statutory period, the ICF forecast impacts were adjusted to align with the program savings and participation levels reflected in the pending 2027-2029 EE and LM program plan filing. The operating lives assumed for energy efficiency programs within the statutory planning period were based on ICF's study assumptions and were used consistently throughout the modeling process. The Peak Saver and Power Saver programs were not assumed to continue beyond 2029, as any extension of these programs would require additional approval from the New Mexico Public Regulation Commission. Peak Saver and Power Saver were included as potential program extensions in the model, using the operating lives assumed by ICF.

Table E-9. General Characteristics of Peak and Power Saver

Demand Response Resources	Status	County	State	First Year	Last Year	Seasonality	Accredited Capacity (%)	Nameplate Capacity (MW)
Peak Saver	Existing	Various	NM	2026	2029	Year-Round	63	30
Power Saver	Existing	Various	NM	2026	2029	Summer	63	40
COST								
Year	2026	2027		2028			2029	
Peak Saver ($000)	3,843	3,477		3,558			3,557	
Power Saver ($000)	5,547	7,050		7,393			7,574	

Table E-10. General Characteristics of PNM's Triennial Energy Efficiency Programs

Energy Efficiency Resources	Status	County	State	First Year	Last Year	Accredited Capacity (%)	Nameplate Capacity (MW)
2026 Program	Existing	Various	NM	2026	2039	87	51
2027 Program	Existing	Various	NM	2027	2040	87	50
2028 Program	Existing	Various	NM	2028	2041	87	52
2029 Program	Existing	Various	NM	2029	2042	87	54
ENERGY COST							
	2026 Program	2027 Program		2028 Program		2029 Program	
($/MWh)	22.5	26.9		28.9		30.5	
ENERGY (GWh)							
Year	2026	2027		2028		2029	
2026 Program	103	103		104		103	

2027 Program	-	102	102	102
ENERGY (GWh)				
Year	2026	2027	2028	2029
2028 Program	-	-	103	102
2029 Program	-	-	-	103

APPENDIX F TRANSMISSION AND DISTRIBUTION FACILITIES

This appendix provides a detailed list of PNM's owned transmission and distribution facilities. Table F-1 provides a list of PNM's existing, planned/under construction, and future transmission substations. Table F-2 provides a list of PNM's existing, planned/under construction, and future distribution substations. Items included on this list are color-coded using the following convention:

- Black – Existing
- **Green – Existing, To Be Replaced**
- **Blue – Future Planned (24+ Months) or Under Construction**

Table F-3 lists existing jointly-owned transmission lines.

TABLE 0-1: EXISTING, PLANNED/UNDER CONSTRUCTION, AND FUTURE TRANSMISSION SUBSTATIONS

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Afton	**345 kV**	**Yes**	**EPE - TOP Owned and Operated by EPE - PNM only owns generation into the substation. Substation will not be evaluated for PNM CIP.**			
Alamogordo	**115 kV**	**No**	**N/A**			
Alamogordo (elements)	-	No	N/A	AR 115 Alamogordo - Amrad	115 kV	Line
Alamogordo (elements)	-	No	N/A	Gary Stephenson - Alamogordo 115 kV line	115 kV	Line
Alamogordo (elements)	-	Yes	PNM - TOP station, Tri-State - TO line	ADA: Dona Ana 115 kV-Alamogordo 115 kV	115 kV	Line
Alamogordo (elements)	-	Yes	PNM - TOP station, Tri-State - TO line	AC 115 Alamogordo - Carrizo	115 kV	Radial Line
Alamogordo (elements)	-	No	EPE owns, PNM Maintains	AH 115 Alamogordo - Holloman	115 kV	Line
Alamogordo (elements)	-	No	N/A	Alamogordo #1 Shunt Capacitors	115 kV	Reactive Resource
Alamogordo (elements)	-	No	N/A	Alamogordo #2 Shunt Capacitors	115 kV	Reactive Resource
Alamogordo (elements)	-	No	N/A	Alamogordo #3 Shunt Capacitors	115 kV	Reactive Resource
Alamogordo North, Mid, & South	**115 kV**	**No**	**N/A**			
Gary Stephenson (elements)	-	No	N/A	Gary Stephenson -Amard 115 kV line	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Gary Stephenson (elements)	-	No	N/A	Alamogordo South-Alamogordo 115 kV line	115 kV	Line
Gary Stephenson (2028)	**115 kV**	**No**	**N/A**			
Alamogordo South 1 & 2 (2028)	**115 kV**	**No**	N / A			
Alcazar	**115 kV**	**No**	**N/A**			
Algodones	**115 kV**	**No**	**N/A**			
Algodones (elements)	-	No	N/A	AL: Algodones 115 kV-Pachman 115 kV	115 kV	Line
Algodones (elements)	-	No	N/A	AW: Algodones 115 kV-Britton 115 kV	115 kV	Line
Algodones (elements)	-	No	N/A	ANZ: Algodones Tap 115 kV-Algodones 115 kV	115 kV	Line
Algodones (elements)	-	Yes	PNM - TOP station, Tri-State - TO line	Algodones 115 kV-La Jara 115 kV	-	Line
Algodones 1 & 2	**115 kV**	**No**	**N/A**			
Alire	**46 kV**	**No**	**N/A**			
Alire (elements)	-	No	N/A	AM: Alire Tap 46kV-Alire Substation	46 kV	Radial Line
Ambrosia 115	**115 kV**	**No**	**N/A**			
Ambrosia 115 (elements)	-	No	N/A	AY: Ambrosia 115 115 kV-Ya-Ta-Hey 115 kV	115 kV	Line
Ambrosia 115 (elements)	-	No	N/A	MA: Ambrosia 115 kV-Red Mesa 115 kV	115 kV	Line
Ambrosia 115 (elements)	-	Yes	TSGT owns, PNM maintains	MB: Ambrosia 115 kV-Bluewater 115 kV	115 kV	Line
Ambrosia 115 (elements)	-	No	N/A	Ambrosia #1 Shunt Capacitors	115 kV	Reactive Resource
Ambrosia 230	**230 kV**	**Yes**	**PNM - TOP**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Ambrosia 230 (elements)	–	Yes	PNM - TOP	WA: Ambrosia 230 kV-West Mesa 230 kV	230 kV	Line
Ambrosia 230 (elements)	–	Yes	TSGT owns, PNM maintains	PSA: Ambrosia - PEGS 230 kV Line	230 kV	Line
Ambrosia 230 (elements)	–	No	N/A	BI: Ambrosia 230 kV-Bisti 230 kV	230 kV	Line
Ambrosia 230 (elements)	–	No	N/A	Ambrosia 230/115 kV Transformer	230 kV	Transformer
Amrad	**115 kV**	**Yes**	**EPE - TOP**			
Amrad (elements)	–	No	N/A	AR 115 Alamogordo - Amrad	115 kV	Line
Amrad (elements) (2028)	–	No	N/A	Gary Stephenson -Amard 115 kV line	115 kV	Line
Amrad 345	**345 kV**	**Yes**	**EPE - TOP**			
Amrad 345 (elements)	–	Yes	EPE - TOP	AA: Amrad-Eddy (Artesia) 345 kV Line	345 kV	Line
Amrad 345 (elements)	–	Yes	EPE - TOP	Amrad-Caliente (Picante) 345 kV Line	345 kV	Line
Amrad 345 (elements)	–	Yes	EPE - TOP	Amrad 345/115 kV Transformer	345 kV	Transformer
Anderson	**115 kV**	**No**	**N/A**			
Arno 1 & 2	**46 kV**	**No**	**N/A**			
Arriba	**115 kV**	**No**	**N/A**			
Arriba (elements)	–	No	N/A	AA: Arriba Tap 115 kV-Arriba Substation	115 kV	Radial Line
Artesia (elements)	–	Yes	EPE - TOP	Amrad-Eddy 345 kV Line	345 kV	Line
Artesia and DC Converter Station	**345 kV**	**Yes**	**EPE - TOP**			
Aspen	**115 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Aspen (elements)	–	No	N/A	ASPN-WSMS1: Aspen-West Mesa	115 kV	Line
Aspen (elements)	–	No	N/A	ASPN-PRGR1: Aspen-Prager	115 kV	Line
Avila	**115 kV**	**No**	**N/A**			
Avila (elements)	–	No	N/A	AV: Avila Tap 115 kV-Avila Substation	115 kV	Line
B-A 115	**115 kV**	**No**	**N/A**			
B-A 115 (elements)	–	No	N/A	AB 115 Reeves-BA (East Circuit)	115 kV	Line
B-A 115 (elements)	–	No	N/A	CB: BA 115 kV-Pachman 115 kV	115 kV	Line
B-A 115 (elements)	–	No	N/A	RB: Reeves 115 kV-BA 115 kV	115 kV	Line
B-A 115 (elements)	–	No	N/A	RL: BA 115 kV-STA 115 kV	115 kV	Line
B-A 115 (elements)	–	No	N/A	RS: BA 115 kV-Zia 115 kV	115 kV	Line
B-A 345	**345 kV**	**No**	**N/A**			
B-A 345 (elements)	–	No	N/A	WN: Rio Puerco 345 kV-BA 345 kV	345 kV	Line
B-A 345 (elements)	–	No	N/A	CJ: Rio Puerco 345 kV-BA 345 kV	345 kV	Line
B-A 345 (elements)	–	No	N/A	BA-DMND1: BA-Diamond Tail #1 345 kV	345 kV	Line
B-A 345 (elements)	–	No	N/A	BA-DMND2: BA-Diamond Tail #2 345 kV	345 kV	Line
B-A 345 (elements)	–	No	N/A	BA 345/115 kV Transformer	345 kV	Transformer
B-A 345 (elements)	–	No	N/A	BA (CJ -formerly WW)- Line Reactor	345 kV	Reactive Resource
Ball Park	**46 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Ball Park (elements)	_	No	N/A	PK: Ball Park Tap 46 kV-Ball Park Substation	46 kV	Radial Line
Beckner Road	**115 kV**	**No**	**N/A**			
Bel Air	**115 kV**	**No**	**N/A**			
Bel Air (elements)	_	No	N/A	BA: Bel Air Tap 115 kV-Bel Air Substation	115 kV	Radial Line
Belen	**115 kV**	**No**	**N/A**			
Belen (elements)	_	No	N/A	SOC: Belen 115 kV-Socorro 115 kV	115 kV	Line
Belen (elements)	_	No	N/A	Phase shifting transformer on Belen-Socorro 115 kV line	115 kV	PST
Belen (elements)	_	No	N/A	WL: Belen - Willard 115 kV	115 kV	Line
Belen (elements)	_	No	N/A	PJ: Belen - Tome 115 kV	115 kV	Line
Belen (elements)	_	No	N/A	LZ: Belen-La Luz	115 kV	Gen Tie Line
Belen (elements)	_	No	N/A	Belen Series Reactor #1	115 kV	Reactive Resource
Belen (elements)	_	No	N/A	Belen Series Reactor #2	115 kV	Reactive Resource
Belen (elements)	_	No	N/A	BELN-SURA1: Sun Ranch-Belen 115 kV	115 kV	Line
Beverly Wood	**115 kV**	**No**	**N/A**			
Bisti	**230 kV**	**No**	**N/A**			
Bisti (elements)	_	No	N/A	BI: Bisti-Ambrosia 230 kV Line	230 kV	Line
Bisti (elements)	_	No	N/A	BP: Bisti-Pillar 230 kV Line	230 kV	Line
Bisti (elements)	_	No	N/A	BX 230 kV Line (radial)	230 kV	Radial Line
Black Ranch	**115 kV**	**No**	**N/A**			
Blackwater	**345 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Blackwater (elements)	–	No	N/A	TB: Blackwater-Taiban 345 kV Line	345 kV	Line
Blackwater (elements)	–	No	N/A	BWF - Generation interconnection	345 kV	Gen Tie Line
Blackwater (elements)	–	No	N/A	DC Converter	345 kV	DC Converter
Blackwater (elements)	–	No	N/A	Synchronous Condenser	345 kV	Reactive Resource
Blackwater (elements)	–	No	N/A	Blackwater Shunt Capacitor	230 kV	Reactive Resource
Bluewater	**115 kV**	**No**	**TSGT - TOP. Removed Low IRC since PNM does not own or maintain any devices in this station- Bluewater is a TSGT station. PNM owns 2 lines in and out of Bluewater but does not own any devices including protection for these lines in the station.**			
Bluewater (elements)	–	No	N/A	BLEW-CIBL1: Bluewater-Cibola 115 kV	115 kV	Line
Bluewater (elements)	–	No	N/A	MB: Ambrosia 115 kV-Bluewater 115 kV	115 kV	Line
Bosque Farms	**46 kV**	**No**	**N/A**			
Bosque Farms (elements)	–	No	N/A	BF: Bosque Farm Tap 115kV	115 kV	Radial Line
Bosque Farms (elements)	–	No	N/A	BF: Bosque Farm Tap 46kV	46 kV	Radial Line
Britton	**115 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Britton (elements)	–	No	N/A	TW: Britton 115 kV-Willard 115 kV	115 kV	Line
Britton (elements)	–	No	N/A	AW: Algodones 115 kV-Britton 115 kV	115 kV	Line
Britton (elements)	–	No	N/A	Britton Shunt Capacitor #1	115 kV	Reactive Resource
Britton (elements)	–	No	N/A	Britton Shunt Capacitor #2	115 kV	Reactive Resource
Buckman	**115 kV**	**No**	**N/A**			
Burro Mountain	**69 kV**	**No**	**N/A**			
Cabezon	**345 kV**	**No**	**N/A**			
Cabezon (elements)	345 kV	No	N/A	WW: San Juan-Cabezon 345 kV Line	345 kV	Line
Cabezon (elements)	345 kV	No	N/A	CZ: Cabezon-Rio Puerco	345 kV	Line
Cabezon (elements)	345 kV	Yes	TSGT - TO/TOP	Transformer 345/115 kV	345 kV	Transformer
Caja Del Rio	**115 kV**	**No**	**N/A**			
Camel Tracks	**46 kV**	**No**	**N/A**			
Capitol	**46 kV**	**No**	**N/A**			
Capitol (elements)	–	No	N/A	HT: Capitol Tap 46kV-Capitol Substation	46 kV	Radial Line
Central	**115 kV**	**No**	**N/A**			
Church Rock	**115 kV**	**No**	**N/A**			
Church Rock (elements)	–	No	N/A	CM: Church Rock Tap 115 kV-Church Rock Substation	115 kV	Line
Cibola	**115 kV**	**No**	**N/A**			
Cibola (Elements)	–	No	N/A	CIBL-PTRO1 Cibola to Petroglyph	115kV	Line
Cibola (Elements)	–	No	N/A	BLEW-CIBL1 Cibola to Bluewater	115kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Cibola (Elements)	_	No	N/A	Route 66 Solar	115kV	Gen Tie Line
Claremont	**115 kV**	**No**	**N/A**			
Claremont (elements)	_	No	N/A	CL: ClaremontTap 115kV-Claremont Substation	115 kV	Radial Line
Clines Corners	**345 kV**	**No**	**N/A**			**Station**
Clines Corners (elements)	_	No	N/A	CLCR-DMND1: Clines Corners-Diamond Tail #1 345 kV line	345 kV	Line
Clines Corners (elements)	_	No	N/A	CLCR-DMND2: Clines Corners-Diamond Tail #2 345 kV line	345 kV	Line
Clines Corners (elements)	_	No	N/A	CLCR-WESP1: Clines Corners-Western Spirit	345 kV	Line
Clines Corners (elements)	_	No	N/A	CP: Clines Corners to Guadalupe 345kV	345 kV	Line
Clines Corners (elements)	_	No	N/A	Clines Corners-Western Spirit Line Shunt Reactor	345 kV	Reactive Resource
Clines Corners (elements)	_	No	N/A	Wind Farm Generation interconnection	_	Gen Tie Line
Coal	**115 kV**	**No**	**N/A**			
Coal (elements)	_	No	N/A	CQ: Coal 115 kV-Coal Tap 115 kV	115 kV	Line
Cochiti	**46 kV**	**No**	**N/A**			
Cochiti (elements)	_	No	N/A	CR: Cochiti Tap 46kV-Cochiti Substation	46 kV	Radial Line
Colinas	**115 kV**	**No**	**N/A**			
College	**115 kV**	**No**	**N/A**			
College	**115 kV**	**No**	**N/A**			
College (elements)	_	No	N/A	CK: Tome-College 115 kV	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
College (elements)	–	No	N/A	College Sectionalizing Breaker		Sectionalizing Breaker
College (elements)	–	No	N/A	TC: College - El Cerro 115 kV	115 kV	Line
Cornell	**115 kV**	**No**	**N/A**			
Cornell (elements)	–	No	N/A	CN: Cornell Tap 115 kV-Cornell Substation	115 kV	Radial Line
Corrales Bluffs	**115 kV**	**No**	**N/A**			
Corrales Bluffs (Q2 2023)	**115 kV**	**No**	**N/A**			
Corrales Bluffs (elements)	–	No	N/A	RR: Corrales Bluffs 115 kV-Veranda 115 kV	115 kV	Line
Corrales Bluffs (elements)	–	No	N/A	CY: Corrales Bluffs 115 kV-Pachman 115 kV	115 kV	Line
Corrales Bluffs (elements)	–	No	N/A	IC: Corrales Bluffs - Irving 115 kV	115 kV	Line
Corrales Bluffs (elements)	–	No	N/A	CS: Corrales Bluffs 115 kV-Sara 115 kV	115 kV	Radial Line
Corrales Bluffs (elements)	–	No	N/A	CT: Corrales Bluffs 115 kV-Sara 115 kV	115 kV	Radial Line
Cottonwood 1 & 2	**115 kV**	**No**	**N/A**			
Cottonwood 1 & 2 (elements)	–	No	N/A	CW: Cottonwood 115 kV Tap-Cottonwood Substation	115 kV	Radial Line
Cuchilla	**115 kV**	**No**	**N/A**			
Cuchilla (elements)	115 kV	No	N/A	RC: Cuchilla 115kV Tap-Cuchilla Substation	115 kV	Line
Deming East & West	**115 kV**	**No**	**N/A**			
Deming East & West (elements) (2031)	–	No	N/A	DM: Mimbres 115 kV-Deming 115 kV	115 kV	Radial Line
Diamond Tail	**345 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Diamond Tail (elements)	–	No	N/A	BA-DMND1: Diamond Tail-BA #1 345 kV	345 kV	Line
Diamond Tail (elements)	–	No	N/A	BA-DMND2: Diamond Tail-BA #2 345 kV	345 kV	Line
Diamond Tail (elements)	–	No	N/A	CLCR-DMND1: Diamond Tail-Clines Corners #1 345 kV	345 kV	Line
Diamond Tail (elements)	–	No	N/A	CLCR-DMND2: Diamond Tail-Clines Corners #2 345 kV	345 kV	Line
Diamond Tail (elements)	–	No	N/A	DMND-NRTN1: Diamond Tail-Norton 345 kV	345 kV	Line
Eastridge	**115 kV**	**No**	**N/A**			
Eastridge (elements)	–	No	N/A	ET: Eastridge 115 kV Tap-Eastridge Substation	115 kV	Radial Line
El Cerro	**115 kV**	**No**	**N/A**			
El Cerro	**115 kV**	**No**	**N/A**			
El Cerro (elements)	–	No	N/A	El Cerro Sectionalizing Breaker		Sectionalizing Breaker
El Cerro (elements)	–	No	N/A	TC: El Cerro - College 115 kV	115 kV	Line
El Cerro (elements)	–	No	N/A	AT: El Cerro - Person 115 kV	115 kV	Line
El Dorado	**115 kV**	**No**	**N/A**			
El Dorado (elements)	–	No	N/A	ES: El Dorado Tap-El Dorado Substation	115 kV	Line
Embudo	**115 kV**	**No**	**N/A**			
Embudo	**115 kV**	**No**	**N/A**			
Embudo (elements)	–	No	N/A	EJ: Embudo 115 kV-Juan Tabo 115 kV	115 kV	Radial Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Embudo (elements)	–	No	N/A	ER: Embudo 115 kV-Reeves 115 kV	115 kV	Line
Embudo (elements) (2028)	–	No	N/A	RE: Embudo 115 kV-Reeves 115 kV	115 kV	Line
Embudo (elements)	–	No	N/A	EMDU-PALO1 Palomas - Embudo 115 kV	115 kV	Line
Embudo (elements)		No	N/A	EMBU-MORR1: Morris-Embudo	115 kV	Line
Embudo (elements)	–	No	N/A	SE: Embudo 115 kV-Sandia 115 kV	115 kV	Line
Embudo (elements)	–	No	N/A	EB-TL: Embudo 115 kV-North (TL Tap)	115 kV	Line
Enchanted Hills	**115 kV**	**No**	**N/A**			
ETA	**115 kV**	**Yes**	**NNSA- Los Alamos Laboratory (LA Cty) TO/TOP**			
ETA (element)	–	No	N/A	NL: Norton 115 kV-ETA (LAC) 115 kV	115 kV	Line
First Street	**115 kV**	**No**	**N/A**			
Fort Marcy	**46 kV**	**No**	**N/A**			
Four Corners	**500 / 345 / 230 kV**	**Yes**	**APS - TO/TOP**			
Four Corners (elements)	–	No	N/A	Four Corners - 500/345 kV Transformer 1AA	500 kV	Transformer
Four Corners (elements)	–	No	N/A	FC: Four Corners-San Juan 345 kV Line	345 kV	Line
Four Corners (elements)	–	No	N/A	Four Corners-Shiprock 345 kV Line	345 kV	Line
Four Corners (elements)	–	No	N/A	FRCR-PINT1: Four Corners-Pintado ISD Q1 2022	345 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Four Corners (elements)	_	No	N/A	Four Corners - Cholla 345 kV 1	345 kV	Line
Four Corners (elements)	_	No	N/A	Four Corners - Cholla 345 kV 2	345 kV	Line
Four Corners (elements)	_	No	N/A	AF: Four Corners 230 kV-Pillar 230 kV	230 kV	Line
Four Corners (elements)	_	No	N/A	Four Corners 345/230 kV XFMR #4	345 kV	Transformer
Four Corners (elements)	_	No	N/A	Four Corners 345/230 kV XFMR #8	345 kV	Transformer
Four Corners (elements)	_	No	N/A	Four Corners - 230/69 kV XFMR #2	230 kV	Transformer
Four Corners (elements)	_	No	N/A	Four Corners - Pintado Line Reactor	345 kV	Reactive Resource
Four Hills	**115 kV**	**No**	**N/A**			
Gallegos 115	**115 kV**	**No**	**N/A**			
Gallegos 115 (elements)	_	No	N/A	Gallegos-230/115 kV Transformer	230 kV	Transformer
Gallegos 115 (elements)	_	No	N/A	GU 115 kV line	115 kV	Line
Gallegos 115 (elements)	_	No	N/A	GK 115 kV line	116 kV	Line
Gallegos 230	**230 kV**	**No**	**N/A**			
Gallegos 230 (elements)	_	No	N/A	Gallegos-Pillar 230 kV Line (GC)	230 kV	Line
Gallinas	**115 kV**	**No**	**N/A**			
Gavilan 1 & 2	**115 kV**	**No**	**N/A**			
Girard	**115 kV**	**No**	**N/A**			
Gold St. 1 & 2	**115 kV**	**No**	**N/A**			
Greenlee	**345 kV**	**Yes**	**TEP - TOP**			
Greenlee (elements)	_	No	N/A	Greenlee-APE COOP 345 kV	345 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Greenlee (elements)	–	No	N/A	GH: Greenlee-Hidalgo 345 kV	345 kV	Line
Greenlee (elements)	–	No	N/A	Greenlee-Copper Verde 345 kV	345 kV	Line
Greenlee (elements)	–	No	N/A	Greenlee-Winchester 345 kV	345 kV	Line
Greenlee (elements)	–	No	N/A	Greenlee-Springerville 345 kV	345 kV	Line
Guadalupe	**345 kV**	**No**	**N/A**			
Guadalupe (elements)	–	No	N/A	TG: Taiban Mesa-Guadalupe 345 kV	345 kV	Line
Guadalupe (elements)	–	No	N/A	CP: Clines Corners to Guadalupe 345kV	345 kV	Line
Guadalupe (elements)	–	No	N/A	Wind Farm Interconnection Tie	345 kV	Gen Tie Line
Guadalupe (elements)	–	No	N/A	GUAD #2 Reactor	345 kV	Reactive Resource
Guadalupe (elements)	–	No	N/A	GUAD #1 Reactor	345 kV	Reactive Resource
Guadalupe (elements)	–	No	N/A	Guadalupe SVC	345 kV	Reactive Resource
Halona	**46 kV**	**No**	**N/A**			
Halona (elements)	–	No	N/A	HT: Halona 46kV Tap-Halona Substation	46 kV	Radial Line
Hamilton 1 & 2	**115 kV**	**No**	**N/A**			
Hassayampa	**500 kV**	**Yes**	**SRP - TOP**			
Hawkins 1 & 2	**115 kV**	**No**	**N/A**			
Hazeldine	**46 kV**	**No**	**N/A**			
Hazeldine (elements)	–	No	N/A	HS: Hazeldine 46kV Tap-Hazeldine Substation	46 kV	Radial Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Hermanas	**115 kV**	**No**	**N/A**			
Hernandez	**115 kV**	**No**	**TSGT - TOP Sub Operated by Tri-State - PNM owns line and 2 relays in station**			
Hernandez (elements)	–	No		HO: Hernandez 115 kV-Ojo 115 kV	115 kV	Line
Hernandez (elements)	–	No		NH: Norton 115 kV-Hernandez 115 kV	115 kV	Line
Hickox	**46 kV**	**No**	**N/A**			
Hickox (elements)	–	No	N/A	HT: Hickox 46kV Tap-Hickox Substation	46 kV	Radial Line
Hidalgo 115	**115 kV**	**No**	**N/A**			
Hidalgo 115 (elements)	–	No	N/A	LB: Hidalgo 115 kV-Lordsburg 115 kV	115 kV	Line
Hidalgo 115 (elements)	–	Yes	TSGT owns, PNM maintains	PYR1: Hidalgo 115 kV-Pyramid 115 kV	115 kV	Line
Hidalgo 115 (elements)	–	Yes	TSGT owns, PNM maintains	PYR2: Hidalgo 115 kV-Pyramid 115 kV	115 kV	Line
Hidalgo 115 (elements)	–	No	N/A	HR: Hidalgo 115 kV-Turquoise 115 kV	115 kV	Line
Hidalgo 345	**345 kV**	**Yes**	**EPE - TOP**			
Hidalgo 345 (elements)	–	No	N/A	GH: Hidalgo-Greenlee 345 kV Line	345 kV	Line
Hidalgo 345 (elements)	–	No	N/A	HL: Hidalgo-Luna 345 kV Line	345 kV	Line
Hidalgo 345 (elements)	–	No	N/A	345/115 kV Transformer T1	345 kV	Transformer
Hidalgo 345 (elements)	–	No	N/A	345/115 kV Transformer T2	345 kV	Transformer
Hidden Mountain (elements) (2028)		No	N/A	HIMO-RTSN1: Rattlesnake-Hidden Mountain #1	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Hidden Mountain (elements)		No	N/A	HIMO-RTSN1: Rattlesnake-Hidden Mountain #2	115 kV	Line
Hidden Mountain (elements)		No	N/A	HIMO-RTSN1: Rattlesnake-Hidden Mountain #3	115 kV	Line
Hidden Mountain (elements)		No	N/A	HIMO-PAJA1: Hidden Mountain-Pajarito 345kV line	345 kV	Line
Hidden Mountain (elements)		No	N/A	HIMO-WESP1: Hidden Mountain-Western Spirit 345 kV line	345 kV	Line
Hidden Mountain (elements)		No	N/A	HIMO 345 kv/115 kV transformer 1	345 kV	Transformer
Hidden Mountain (elements)		No	N/A	HIMO 345 kv/115 kV transformer 2	345 kV	Transformer
Hidden Mountain (elements)		No	N/A	HIMO 345 kv/115 kV transformer 3	345 kV	Transformer
Hidden Mountain 115	**115 kV**	**No**	**N/A**			
Hidden Mountain 345	**345 kV**	**No**	**N/A**			
Hogback	**230 kV**	**Yes**	**CoF - TO/TOP**			
Holloman	**115 kv**	**Yes**	**EPE - TOP**			
Holloman (elements)	-	No	EPE owns, PNM Maintains	AH 115 Alamogordo - Holloman	115 kV	Line
Hollywood (elements)	-	No	N/A	HG: Hollywood 115 kV-Gavilan 115 kV	115 kV	Radial Line
Hollywood (elements)	-	No	N/A	Hollywood - Carrizo Canyon 115 kV	115 kV	Radial Line
Hollywood (Ruidoso) 1 & 2	**115 kV**	**No**	**N/A**			
Hondale	**115 kV**	**No**	**N/A**			
Huning Ranch	**115 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Huning Ranch (elements)	–	No	N/A	HM: Huning Ranch - Los Morros 115 kV Line	115 kV	Line
Huning Ranch (elements)	–	No	N/A	HU: Huning Ranch - West Mesa Bus #1 115 kV Line	115 kV	Line
Huning Ranch (elements)	–	No	N/A	WD: Huning Ranch - West Mesa Bus #3 115 kV Line	115 kV	Line
Huning Ranch (elements)	–	No	N/A	Huning Ranch Shunt Capacitor #1	115 kV	Reactive Resource
Huning Ranch (elements)	–	No	N/A	Huning Ranch Shunt Capacitor #2	115 kV	Reactive Resource
Huning Ranch (elements)	–	No	N/A	HNRN-RTSN1: Huning Ranch - Rattlesnake #1 115 kV line	115kV	Radial Line
Huning Ranch (elements)	–	No	N/A	HNRN - RTSN2: Huning Ranch to Rattlesnake #2 115 kV line	115kV	Radial Line
Hurley Tap	**115 kV**	**No**	**N/A**			
Indian Hospital	**115 kV**	**No**	**N/A**			
Inez	**115 kV**	**No**	**N/A**			
Inez (elements)	–	No	N/A	MT: Inez 115 kV Tap-Inez Substation	115 kV	Radial Line
Innovation	**115 kV**	**No**	**N/A**			
Iris	**115 kV**	**No**	**N/A**			
Iron Street 1 & 2	**46 kV**	**No**	**N/A**			
Iron Street 1 & 2 (elements)	–	No	N/A	PI: Iron Street-Prager	46 kV	Line
Iron Street 1 & 2 (elements)	–	No	N/A	HI: Iron Street-Person	46 kV	Line
Irving	**115 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Irving (elements)	–	No	N/A	IC: Irving 115 kV-Corrales 115 kV	115 kV	Line
Irving (elements)	–	No	N/A	IR: Irving 115 kV-Reeves 115 kV	115 kV	Line
Irving (elements)	–	No	N/A	WR: West Mesa 115 kV-Irving 115 kV	115 kV	Line
Isleta	**46 kV**	**No**	**N/A**			
Isleta (elements)	–	No	N/A	IS: Isleta 46kV Tap-Isleta Substation	46 kV	Radial Line
Jarales	**115 kV**	**No**	**N/A**			
Jarales (elements)	–	No	N/A	JA: Jarales 115 kV Tap-Jarales Substation	115 kV	Radial Line
Jefferson	**115 kV**	**No**	**N/A**			
Jefferson (elements)	–	No	N/A	JT: Jefferson 115 kV Tap-Jefferson Substation	115 kV	Radial Line
Jicarilla	**345 kV**	**No**	**N/A**			
Jicarilla (elements)	–	No	N/A	OC: San Juan-Jicarilla 345 kV line	345 kV	Line
Jicarilla (elements)	–	No	N/A	OJ: Jicarilla 345 kV-Ojo 345 kV	345 kV	Line
Jicarilla (elements)	–	No	N/A	Jicarilla 345/115 kV Transformer	345 kV	Transformer
Jicarilla (elements)	–	No	N/A	Jicarilla Solar 1 and 2	345kV	Gen Tie Line
Jicarilla (elements)	–	No	N/A	Jicarilla-JANPA bus tie		Bus Tie
Jicarilla (elements)	–	No	N/A	Jicarilla Shunt Reactor	345 kV	Reactive Resource

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Jojoba	**500 kV**	**Yes**	SRP - TOP Operated by APS/SRP-PNM does not operate any equipment at this site-Jointly Owned Lines Operated by Other Utilities. It is covered by the ANPP agreement and is therefore being evaluated by SRP.			
Jojoba (elements)	–	No	N/A	Hassayampa 500 kV-Jojoba	500 kV	Line
Jojoba (elements)	–	No	N/A	345 kV-Kyrene 345 kV	345 kV	Line
Juan Tabo	**115 kV**	**No**	**N/A**			
Juan Tabo (element)	–	No		EJ: Juan Tabo Tap 115 kV Tap-Juan Tabo Substation	115 kV	Radial Line
Kaiser	**46 kV**	**No**	**N/A**			
Kaiser (element)	–	No		RT: KaiserTap 46 kV Tap-Kaiser Substation	46 kV	Radial Line
Keleher	**46 kV**	**No**	**N/A**			
Keleher (element)	–	No		KL: Keleher 46 kV Tap-Keleher Substation	46 kV	Radial Line
Kermac	**115 kV**	**No**	**N/A**			
Kewa	**115 kV**	**No**	**N/A**			
Kirtland	**115 kV**	**No**	**N/A**			
Kirtland (elements)	–	No	N/A	KB: Kirtland 115 kV-Sandia Lab 115 kV	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Kirtland (elements)	–	No	N/A	KS: Sandia 115 kV-Kirtland 115 kV	115 kV	Line
Kirtland (elements)	–	No	N/A	PS: Person 115 kV-Kirtland 115 kV	115 kV	Line
Kirtland (elements)	–	No	N/A	PROS-KIRT1 Kirtland-Prosperity 115 kV	115 kV	Line
Kirtland (elements)	–	No	N/A	KD: Kirtland 115 kV-Sandia Lab 115 kV	115 kV	Line
Kirtland (elements)	–	No	N/A	KA: Kirtland 115 kV-USAF 115 kV	115 kV	Line
Kyrene	**500 kV**	**No**	SRP - TOP			
La Bajada	**46 kV**	**No**	**N/A**			
La Morada	**115 kV**	**No**	**N/A**			
Lawrence	**115 kV**	**No**	**N/A**			
Lawrence (elements)	–	No	N/A	LW: Lawrence Tap 115 kV-Lawrence Substation	115 kV	Radial Line
Lenkurt	**115 kV**	**No**	**N/A**			
Lenkurt (elements)	–	No	N/A	LU: Lenkurt Tap 115 kV-Lenkurt Substation	115 kV	Radial Line
Leyendecker	**115 kV**	**No**	**N/A**			
Leyendecker (elements)	–	No	N/A	LT: Leyendecker Tap 115 kV-Leyendecker Substation	115 kV	Radial Line
Lomas	**115 kV**	**No**	**N/A**			
Lomas (elements)	–	No	N/A	PL: Prager Tap 115 kV-Lomas 115 kV	115 kV	Radial Line
Lordsburg	**115 kV**	**No**	**N/A**			
Lordsburg (elements)	–	No	N/A	LB: Hidalgo 115 kV-Lordsburg 115 kV	115 kV	Line
Lordsburg (elements)	–	No	N/A	Lordsburg Gen Tie	115 kV	Gen Tie Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Lordsburg (elements)	–	No	N/A	Lordsburg Transformer 115/69 kV	115 kV	Transformer
Lordsburg 69 kV	**68 kV**	**No**	**N/A**			
Lordsburg 69 kV	**69 kV**	**No**	**N/A**			
Lordsburg 69 kV (elements)	–	No	N/A	Lordsburg-MD 69 kV Line	69 kV	Radial Line
Lordsburg 69 kV (elements)	–	No	N/A	Lordsburg 115/69 kV Transformer	69 kV	Radial Line
Lordsburg 69 kV (elements)	–	No	N/A	Lordsburg-Burro Mountain 69 kV Line	69 kV	Radial Line
Los Angeles	**115 kV**	**No**	**N/A**			
Los Chavez	**46 kV**	**No**	**N/A**			
Los Chavez (elements)	–	No	N/A	Los Chavez Shunt Capacitor #1	46 kV	Reactive Resource
Los Chavez (elements)	–	No	N/A	Los Chavez Shunt Capacitor #1	46 kV	Reactive Resource
Los Lunas	**46 kV**	**No**	**N/A**			
Los Morros	**115 kV**	**No**	**N/A**			
Los Morros (elements)	–	No	N/A	Los Morros Sectionalizing Breaker	115 kV	Sectionalizing Breaker
Los Morros (elements)	–	No	N/A	WB: Belen - Los Morros 115 kV	115 kV	Line
Los Morros (elements)	–	No	N/A	Los Morros-Huning Ranch 115kV	115 kV	Line
Los Morros (elements)	–	No	N/A	LOMO-STCE1 Los Morros-St. Cecilia	115 kV	Line
Los Morros 1 & 2	**115 kV**	**No**	**N/A**			
Lost Horizon	**115 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Lost Horizon (elements)	–	No	N/A	LO: Lost Horizon Tap 115 kV-Lost Horizon Substation	115 kV	Line
Louden Hill (Q2 2024)	**46 kV**	**No**	**N/A**			
Louden Hill (element)	46 kV	No	N/A	LH: Louden Hill Tap 46kV	46 kV	Radial Line
Luna 115	**115 kV**	**No**	**PNM - TO/TOP**			
Luna 115 (elements)	–	No	N/A	LK: Luna 115 kV-MD-1 115 kV	115 kV	Line
Luna 115 (elements)	–	No	N/A	ML: Luna 115 kV-Mimbres 115 kV	115 kV	Line
Luna 115 (elements) (2031)	–	No	N/A	Luna 115 kV - Perrin 115 kV	115 kV	Line
Luna 345	**345 kV**	**No**	**EPE - TO/TOP**			
Luna 345 (elements)	–	No	N/A	HL:Luna-Hidalgo 345 kV Line	345 kV	Line
Luna 345 (elements)	–	No	N/A	VL: Luna-Springerville 345 kV Line	345 kV	Line
Luna 345 (elements)	–	No	N/A	LN: Luna-Afton 345 kV Line	345 kV	Line
Luna 345 (elements)	–	No	N/A	LD: Luna-Diablo 345 kV Line	345 kV	Line
Luna 345 (elements)	–	No	PNM - TO/TOP	LL: Luna-LEF 345 kV Tie	345 kV	Gen Tie Line
Luna 345 (elements)	–	No	PNM - TO/TOP	Luna 345/115 kV Transformer	345 kV	Transformer
Manhattan	**46 kV**	**No**	**N/A**			
Manzanita (Q4 2023)	**46 kV**	**No**	N/A			
Manzano	**115 kV**	**No**	**N/A**			
Mariposa	**115 kV**	**No**	**N/A**			
Marquez	**115 kV**	**No**	**N/A**			
Marquez (elements)	–	No	N/A	KC: Marquez 115 kV-Marquez Tap 115 kV	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
McKinley	**345 kV**	**Yes**	**TEP - TOP**			
McKinley (elements)	–	No	N/A	McKinley - San Juan 345 kV Line 1 (TS1)	345 kV	Line
McKinley (elements)	–	No	N/A	McKinley - San Juan 345 kV Line 2 (TS2)	345 kV	Line
McKinley (elements)	–	No	N/A	McKinley-Springerville 345 kV Line	345 kV	Line
McKinley (elements)	–	Yes	PNM TOP	Yah-ta-hey Transformer 345/ 115 kV #1	345 kV	Transformer
McKinley (elements)	–	Yes	PNM TOP	Yah-ta-hey Transformer 345/ 115 kV #2	345 kV	Transformer
MD-1	**115 kV**	**No**	**N/A**			
MD-1 (elements)	–	No	N/A	MH: MD-1 115 kV-Ivanhoe (PD) 115 kV	115 kV	Radial Line
MD-1 (elements)	–	No	N/A	LK: Luna 115 kV-MD-1 115 kV	115 kV	Line
MD-1 (elements)	–	No	N/A	MR: MD-1 115 kV-Turquoise 115 kV	115 kV	Line
MD-1 (elements)	–	No	N/A	MD-1 Shunt Capacitors	115 kV	Reactive Resource
MD-1 (elements) (2031)	–	No	N/A	MD-1 115 kv - Perrin 115 kv	115 kV	Line
MD-1 69 kV	**69 kV**	**No**	**N/A**			
MD-1 69 kV	**69 kV**	**No**	**N/A**			
MD-1 69 kV (elements)	–	No	N/A	MD 115/69 kV Transformer	115 kV	Transformer
MD-1 69 kV (elements)	–	No	N/A	MD 69 kV shunt Capacitor	69 kV	Reactive Resource
MD-1 69 kV (elements)	–	No	N/A	MD-Lordsburg 69 kV Line	69 kV	Radial Line
MD-1 69 kV (elements)	–	No	N/A	MD-Silver City 69 kV Line	69 kV	Radial Line
MD-1 69 kV (elements)	–	No	N/A	MD-Cobre Mine 69 kV Line	69 kV	Radial Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Mejia	**115 kV**	**No**	**N/A**			
Mejia (elements)	–	No	N/A	ZN: MejiaTap 115 kV-Mejia Substation	115 kV	Line
Menaul	**115 kV**	**No**	**N/A**			
Menaul (elements)	–	No	N/A	MT: Menaul Tap 115 kV-Menaul Substation	115 kV	Radial Line
Miguel Lujan	**115 kV**	**No**	**N/A**			
Miguel Lujan (elements)	–	No	N/A	MI: Miguel Lujan 115 kV Tap-Miguel Lujan Substation	115 kV	Radial Line
Mimbres	**115 kV**	**No**	**N/A**			
Mimbres (elements)	–	Yes	PNM owns/operates Mimbres station, Tri-State owns the line	MEB: Mimbres 115 kV-Caballo (TSGT) 115 kV	115 kV	Line
Mimbres (elements)	–	No	N/A	ML: Luna 115 kV-Mimbres 115 kV	115 kV	Line
Mimbres (elements)	–	No	N/A	DM: Mimbres 115 kV-Deming 115 kV	115 kV	Radial Line
Mimbres (elements)	–	No	N/A	MW: Mimbres 115 kV-Hermanas-Hondale 115 kV	115 kV	Radial Line
Mimbres (elements)	–	No	N/A	DL: Mimbres 115 kV-Picacho 115 kV	115 kV	Line
Mimbres (elements)	–	No	N/A	Mimbres #1 Shunt Capacitors	115 kV	Reactive Resource
Mimbres (elements)	–	No	N/A	Mimbres #2 Shunt Capacitors	115 kV	Reactive Resource
Mimbres (elements)	–	No	N/A	Mimbres #3 Shunt Capacitors	115 kV	Reactive Resource
Mission	**115 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Mission (elements)	–	No	N/A	MN: Mission 115 kV-North 115 kV	115 kV	Line
Mission (elements)	–	No	N/A	NR: Reeves 115 kV-Mission 115 kV	115 kV	Line
Mission (elements)	–	No	N/A	Mission Sectionalizing Breaker	115 kV	Sectionalizing Breaker
Mission 1 & 2	**115 kV**	**No**	**N/A**			
Montano	**115 kV**	**No**	**N/A**			
Montano (elements)	–	No	N/A	MP: Montano Tap 115 kV-Montano Substation	115 kV	Radial Line
Montgomery Plaza	**115 kV**	**No**	**N/A**			
Montgomery Plaza (elements)	–	No	N/A	MG: Montgomery Plaza Tap 115 kV-Montgomery Plaza Substation	115 kV	Radial Line
Morris (2031)	**115 kV**	**No**	**N/A**			
Morris (elements)	–	No	N/A	MORR-NRTH1: Morris-North	115 kV	Line
Morris (elements)	–	No	N/A	EMBU-MORR1: Morris-Embudo	115 kV	Line
Morris (elements)	–	No	N/A	Sectionalizing breaker	115 kV	Sectionalizing Breaker
Morris (elements)	–	No	N/A	Sectionalizing breaker	115 kV	Sectionalizing Breaker
Morris 1 & 2	**115 kV**	**No**	**N/A**			
Newell	**46 kV**	**No**	**N/A**			
Newell (elements)	–	No	N/A	WT: Newell Tap 46kV-Newell Substation	46 kV	Radial Line
North	**115 kV**	**No**	**N/A**			
North (elements)	–	No	N/A	EB-TL: Embudo 115 kV-North (TL Tap)	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
North (elements)	–	No	N/A	PN: Richmond-North	115 kV	Line
North (elements)	–	No	N/A	MN: Mission 115 kV-North 115 kV	115 kV	Line
North (elements)	–	No	N/A	RN: Reeves 115 kV-North 115 kV	115 kV	Line
North (elements) (2031)	–	No	N/A	MORR-NRTH1: Morris-North	115 kV	Line
North (elements)	–	No	N/A	North #1 Shunt Capacitors	115 kV	Reactive Resource
North (elements)	–	No	N/A	North #2 Shunt Capacitors	115 kV	Reactive Resource
North 1 and 2	**115 kV**	**No**	**N/A**			
North Bernalillo	**115 kV**	**No**	**N/A**			
North Bernalillo (elements)	–	No	N/A	BR: North BernalilloTap 115kV-North Bernalillo Substation	115 kV	Radial Line
North Silver	**69 kV**	**No**	**N/A**			
Norton 115	**115 kV**	**No**	**N/A**			
Norton 115 (elements)	–	No	N/A	NL: Norton 115 kV-ETA (LAC) 115 kV	115 kV	Line
Norton 115 (elements)	–	No	N/A	ANZ: Norton Tap 115 kV-Norton 115 kV	115 kV	Line
Norton 115 (elements)	–	No	N/A	NH: Norton 115 kV-Hernandez 115 kV	115 kV	Line
Norton 115 (elements)	–	No	N/A	NS: Norton 115 kV-Zia 115 kV	115 kV	Line
Norton 115 (elements)	–	No	N/A	Norton Series Reactors	115 kV	Reactive Resource
Norton 115 (elements)	–	No	N/A	Norton Shunt Capacitors	115 kV	Reactive Resource

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Norton 345	**345 kV**	**No**	**N/A**			
Norton 345 (elements)	–	No	N/A	DMND-NRTN1: Diamond Tail-Norton 345 kV	345 kV	Line
Norton 345 (elements)	–	No	N/A	Norton 345/115 kV Transformer	345 kV	Transformer
Ojo 115	**115 kV**	**No**	**N/A**			
Ojo 115 (elements)	–	No	N/A	HO: Hernandez 115 kV-Ojo 115 kV	115 kV	Line
Ojo 345	**345 kV**	**Yes**	**PNM - TOP**			
Ojo 345 (elements)	–	No	N/A	OJ: Jicarilla 345 kV-Ojo 345 kV	345 kV	Line
Ojo 345 (elements)	–	Yes	TSGT Owns and Operates	OT: Ojo-Taos 345 kV Line	345 kV	Line
Ojo 345 (elements)	–	No	N/A	Ojo 345/115 kV Transformer	345 kV	Transformer
Ojo 345 (elements)	–	No	N/A	OJO #1 OJ Line Reactor	345 kV	Reactive Resource
Ojo 345 (elements)	–	No	N/A	OJO #2 OJ Line Reactor	345 kV	Reactive Resource
Ortiz	**115 kV**	**No**	**N/A**			
Pachmann	**115 kV**	**No**	**N/A**			
Pachmann (Q3 2023)	**115 kV**	**No**	**N/A**			
Pachmann (elements)	–	No	N/A	PR: Pachmann 115 kV-Rio Puerco 115 kV	115 kV	Line
Pachmann (elements)	–	No	N/A	CE: Pachmann 115 kV-Scenic 115 kV	115 kV	Line
Pachmann (elements)	–	No	N/A	CY: Corrales Bluffs 115 kV-Pachmann 115 kV	115 kV	Line
Pachmann (elements)	–	No	N/A	CB: BA 115 kV-Pachmann 115 kV	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Pachmann (elements)	–	No	N/A	AL: Algodones 115 kV-Pachmann 115 kV	115 kV	Line
Pajarito	**345 kV**	**No**	**N/A**			
Pajarito (elements)	–	No	N/A	Pajarito-Western Spirit Line Shunt Reactor	345 kV	Reactive Resource
Pajarito (elements)	–	No	N/A	PAJA-WSMS1: West Mesa 345 kV to Pajarito 345 kV	345kV	Line
Pajarito (elements)	–	No	N/A	PAJA-SAND1: Pajarito 345 kV to Sandia 345 kV	345kV	Line
Pajarito (elements) (2029)	–	No	N/A	Pajarito - Prosperity 345 kV	345 kV	Line
Pajarito (elements)	–	No	N/A	HIMO-PAJA: Hidden Mnt 345 kV to Pajarito 345 kV	345kV	Line
Palace	**115 kV**	**No**	**N/A**			
Palm	**115 kV**	**No**	**N/A**			
Palo Verde	**500 kV**	**Yes**	**SRP - TOP Switchyard is operated by SRP. Covered by delegation in the ANPP High Voltage Switchyard Operating Agent agreement.**			
Palo Verde (elements)	–	No	N/A	PV-WW: Palo Verde 500 kV-Westwing 500 kV	500 kV	Line
Palo Verde (elements)	–	No	N/A	PV-WW: Palo Verde 500 kV-Westwing 500 kV	500 kV	Line
Palomas (2028)	**115 kV**	**No**	**N/A**			
Palomas (elements)	–	No	N/A	EMDU-PALO1 Palomas - Embudo 115 kV	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Palomas (elements)	-	No	N/A	PALO-REEV1 Palomas - Reeves 1 115 kV	115 kV	Line
Palomas 1 & 2 (2028)	**115 kV**	**No**	N/A			
Panorama	**115 kV**	**No**	**N/A**			
Paradise Hills	**115 kV**	**No**	**N/A**			
Pecos	**46 kV**	**No**	**N/A**			
Peralta	**46 kV**	**No**	**N/A**			
Perrin (2031)	**115 kV**	**No**	**N/A**			
Perrin (element)	-	No	N/A	Perrin - MD1 115 kV Line	115 kV	Line
Perrin (element)	-	No	N/A	Perrin - Luna 115 kV	115 kV	Line
Perrin (element)	-	No	N/A	Sectionalizing Breaker	115 kV	Sectionalizing Breaker
Perrin 1 & 2	**115 kV**	**No**	N/A			
Person	**115 kV**	**No**	**N/A**			
Person (elements)	-	No	N/A	PS: Person 115 kV-Kirtland 115 kV	115 kV	Line
Person (elements)	-	No	N/A	SP: Person 115 kV-Normally Open Switch SP-83 and HW-43	115 kV	Radial Line
Person (elements)	-	No	N/A	AT: Person 115 kV-El Cerro 115 kV	115 kV	Line
Person (elements)	-	No	N/A	Person Transformer 115/46 kV	115 kV	Transformer
Person (elements)	-	No	N/A	PM: Person 115 kV-West Mesa 115 kV	115 kV	Line
Person (elements)	-	No	N/A	PW: Person - Snow Vista	115 kV	Line
Person (elements)	-	No	N/A	Rio Bravo Gen Tie	115 kV	Gen Tie Line
Person (elements)	-	No	N/A	PERS-SAGE1: Person-Sagebrush	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Person (elements)	–	No	N/A	PB: Person - Tome 115 kV	115 kV	Line
Person 46kV	**46 kV**	**No**	**N/A**			
Person 46kV (elements)	–	No	N/A	EL: Person radial (Arno)	46 kV	Radial Line
Person 46kV (elements)	–	No	N/A	BN: Person-Tome	46 kV	Line
Person 46kV (elements)	–	No	N/A	PB: Person-Tome	46 kV	Line
Person 46kV (elements)	–	No	N/A	PC: Person radial (KAFB West)	46 kV	Radial Line
Person 46kV (elements)	–	No	N/A	PH: Person-Iron Street	46 kV	Radial Line
Person 46kV (elements)	–	No	N/A	115/46 kV Transformer	46 kV	Transformer
Petroglyph	**115 kV**	**No**	**N/A**			
Petroglyph	**115 kV**	**No**	**N/A**			
Petroglyph (elements)	–	No	N/A	PTRO-WSMS1 West Mesa to Petroglyph	115kV	Line
Petroglyph (elements)	–	No	N/A	CIBL-PTRO1: Petroglyph-Cibola	115kV	Line
Picacho	**115 kV**	**Yes**	**EPE - TOP PNM owns station, EPE operates Picacho station,**			
Picacho (elements)	–	Yes	TSGT owns, PNM maintains	PDA: Picacho 115 kV-Dona Ana (TSGT) 115 kV	115 kV	Line
Picacho (elements)	–	No	N/A	DL: Mimbres 115 kV-Picacho 115 kV	115 kV	Line
Picacho (elements)	–	Yes	EPE - TOP	FNT: Picacho 115 kV-Frontier 115 kV	115 kV	Line
Pillar	**230 kV**	**No**	**N/A**			
Pillar (Elements)	–	No	N/A	BP: Pillar 230 kV-Bisti 230 kV	230 kV	Line
Pillar (Elements)	–	No	N/A	AF: Pillar-Four Corners 230 kV Line	230 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Pillar (Elements)	–	No	N/A	GC: Pillar 230 kV-Gallegos 230 kV	230 kV	Line
Pintado	**345 kV**	**No**	**N/A**			
Pintado (Elements)	–	No	N/A	FRCR-PINT1: Pintado-Four Corners 345 kV	345 kV	Line
Pintado (Elements)	–	No	N/A	PINT-RIPU1: Pintado-Rio Puerco 345 kV	345 kV	Line
Pintado (Elements)	–	No	N/A	ARSO-PNT1: Arroyo Solar gen tie	345 kV	Gen Tie Line
Pittsburgh-Midway	**115 kV**	**No**	**N/A**			
Pittsburgh-Midway (elements)	–	No	N/A	YP: Pitt/Midway Tap 115 kV-Pitt/Midway Substation	115 kV	Radial Line
Power Plant	**46 kV**	**No**	**N/A**			
Power Plant (elements)	–	No	N/A	ZS: Power Plant-Zia	46 kV	Line
Power Plant (elements)	–	No	N/A	ZM: Power Plant-Zia	46 kV	Line
Power Plant (elements)	–	No	N/A	MS: Power Plant-Zia	46 kV	Line
Prager	**115 kV**	**No**	**N/A**			
Prager	**115 kV**	**No**	**N/A**			
Prager (elements)	–	No	N/A	PL: Prager 115 kV-Lomas 115 kV	115 kV	Radial Line
Prager (elements)	–	No	N/A	WP: West Mesa 115 kV-Prager 115 kV	115 kV	Line
Prager (elements)	–	No	N/A	Transformer 115/46 kV	115 kV	Transformer
Prager (elements)	–	No	N/A	RP: Prager 115 kV-Richmond 115 kV	115 kV	Line
Prager (elements)	–	No	N/A	Prager Shunt Capacitors	115 kV	Reactive Resource
Prager (elements) (2031)	–	No	N/A	ASPN-PRGR1: Aspen-Prager	115 kV	Line
Prager 46kV	**46 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Prager 46kV (element)	–	No	N/A	PI: Prager-Iron Street	46 kV	Line
Prager 46kV (element)	–	No	N/A	PY: Person-Prager	46 kV	Line
Prager 46kV (element)	–	No	N/A	115/46 kV Transformer	46 kV	Transformer
Princess Jeanne	**115 kV**	**No**	**N/A**			
Progress	**115 kV**	**No**	**N/A**			
Prosperity 115 (Q2 2024)	**115 kV**	**No**	**N/A**			
Prosperity (Q2 2024)	**115 kV**	**No**	**N/A**			
Prosperity 345 (Q2 2029)	**345 kV**	**No**	**N/A**			
Prosperity (elements)	–	No	N/A	PERS-PROS1 Prosperity-Person 115 kV line	115 kV	Line
Prosperity (elements)	–	No	N/A	PRSO-KIRT1 Prosperity-Kirtland 115 kV line	115 kV	Line
Prosperity (elements)	–	No	N/A	PROS-STUD1 Prosperity-Studio 115 kV line	115 kV	Line
Prosperity (elements) (2029)	–	No	N/A	Prosperity-Pajarito 345 kV line 1	345 kV	Line
				Prosperity-Pajarito 345 kV line 2	345 kV	Line
Prosperity (elements)	–	No	N/A	345/115 kV Transformer	345 kV	Transformer
Quail Ranch (Q1 2024)	**345 kV**	**No**	N/A			
Quail Ranch (elements)	–	No	N/A	QLRA-WSMS1 Quail Ranch-West Mesa 345 kV Line	345 kV	Line
Quail Ranch (elements)	–	No	N/A	QLRA-RIPU1 Quail Ranch-Rio Puerco 345 kV line	345 kV	Line
Quail Ranch (elements)	–	No	N/A	Atrisco Solar - QR: Atrisco Solar Gen Tie	345 kV	Gen Tie Line
Randolph	**115 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Rattlesnake (2028)	**115 kV**	**No**	**N/A**			
Rattlesnake (elements)	–	No	N/A	HNRN-RTSN1: Rattlesnake to Huning Ranch #1 115 kV Line	115kV	Radial Line
Rattlesnake (elements)	–	No	N/A	HNRN-RTSN2: Rattlesnake to Huning Ranch #2 115 kV Line	115kV	Radial Line
Rattlesnake (elements)		No	N/A	HIMO-RTSN1: Rattlesnake-Hidden Mountain #1	115 kV	Line
Rattlesnake (elements)		No	N/A	HIMO-RTSN1: Rattlesnake-Hidden Mountain #2	115 kV	Line
Rattlesnake (elements)		No	N/A	HIMO-RTSN1: Rattlesnake-Hidden Mountain #3	115 kV	Line
Rattlesnake (elements)	–	No	N/A	RTSN-SURA1: Sun Ranch-Rattlesnake 115 kV	115kV	Line
Red Mesa	**115 kV**	**No**	**N/A**			
Red Mesa (elements)	–	No	N/A	KM: West Mesa - Red Mesa 115 kV	115 kV	Line
Red Mesa (elements)	–	No	N/A	MA: Ambrosia 115 kV-Red Mesa 115 kV	115 kV	Line
Red Mesa (elements)	–	N/A	PNM does not own or operate this line.	Red Mesa Wind Farm Tie 115 kV	115 kV	Gen Tie Line
Reeves	**115 kV**	**No**	**N/A**			
Reeves	**115 kV**	**No**	**N/A**			
Reeves (elements)	–	No	N/A	AB: Reeves 115 kV-BA 115 kV	115 kV	Line
Reeves (elements)	–	No	N/A	RB: Reeves 115 kV-BA 115 kV	115 kV	Line
Reeves (elements)	–	No	N/A	NR: Reeves 115 kV-Mission 115 kV	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Reeves (elements)	–	No	N/A	RN: Reeves 115 kV-North 115 kV	115 kV	Line
Reeves (elements)	–	No	N/A	IR: Irving 115 kV-Reeves 115 kV	115 kV	Line
Reeves (elements)	–	No	N/A	ER: Embudo 115 kV-Reeves 115 kV	115 kV	Line
Reeves (elements)	–	No	N/A	RE: Embudo 115 kV-Reeves 115 kV	115 kV	Line
Reeves (elements) (2028)	–	No	N/A	PALO-REEV1 Palomas - Reeves 1 115 kV	115 kV	Line
Reeves (elements)	–	No	N/A	NW: Reeves 115 kV-West Mesa 115 kV	115 kV	Line
Reeves (elements)	–	N/A	N/A	Reeves Unit 1 gen tie	116 kV	Gen Tie Line
Reeves (elements)	–	N/A	N/A	Reeves Unit 2 gen tie	117 kV	Gen Tie Line
Reeves (elements)	–	N/A	N/A	Reeves Unit 3 gen tie	118 kV	Gen Tie Line
Reeves (elements)	–	No	N/A	Reeves Shunt Capacitors	115 kV	Reactive Resource
Richmond (2027)	**115 kV**	**No**	**N/A**			
Richmond	**115 kV**	**No**	**N/A**			
Richmond (element)	–	No	N/A	RP: Richmond - Prager 115 kV	115 kV	Line
Richmond (element)	–	No	N/A	CG: Richmond - Sandia 115 kV	115 kV	Line
Richmond (element)	–	No	N/A	PN: Richmond - North 115 kV	115 kV	Line
Rio Hondo	**115 kV**	**No**	**N/A**			
Rio Puerco 115	**115 kV**	**No**	**N/A**			
Rio Puerco 115 (elements)	–	No	N/A	PV: Rio Puerco 115 kV-Veranda 115 kV	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Rio Puerco 115 (elements)	-	No	N/A	PR: Pachmann 115 kV-Rio Puerco 115 kV	115 kV	Line
Rio Puerco 115 (elements)	-	No	N/A	Encino/Encino N 115 kv Gen Tie	115 kV	Gen Tie Line
Rio Puerco 115 (elements)	-	No	N/A	Tag Solar 115 kv Gen Tie	115 kV	Gen Tie Line
Rio Puerco 345	**345 kV**	**No**	**N/A**			
Rio Puerco 345 (elements)	-	No	N/A	BJ: West Mesa-Rio Puerco 345 kV Line 1	345 kV	Line
Rio Puerco 345 (elements)	-	No	N/A	AJ: West Mesa-Rio Puerco 345 kV Line 2	345 kV	Line
Rio Puerco 345 (elements)	-	No	N/A	WN: BA - Rio Puerco 345 kV Line 1	345 kV	Line
Rio Puerco 345 (elements)	-	No	N/A	CJ: BA - Rio Puerco 345 kV Line 2	345 kV	Line
Rio Puerco 345 (elements)	-	No	N/A	CZ: Cabezon-Rio Puerco	345 kV	Line
Rio Puerco 345 (elements)	-	No	N/A	PINT-RIPU1: Rio Puerco-Pintado 345 kV	346 kV	Line
Rio Puerco 345 (elements)	-	No	N/A	Rio Puerco 345 kV/115 kV Transformer	345 kV	Transformer
Rio Puerco 345 (elements)	-	No	N/A	Rio Puerco - Pintado 345 kV (series capacitors)	345 kV	Line
Rio Puerco 345 (elements)	-	No	N/A	Rio Puerco -Cabezon 345 CZ (series capacitors)	345 kV	Line
Rio Puerco 345 (elements)	-	No	N/A	QLRA-RIPU1 Quail Ranch-Rio Puerco 345 kV line	345 kV	Line
Rio Puerco 345 (elements)	-	No	N/A	FW #1 Line Shunt Reactor	345 kV	Reactive Resource
Rio Puerco 345 (elements)	-	No	N/A	WW #2 Line Shunt Reactor	345 kV	Reactive Resource

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Rio Puerco 345 (elements)	–	No	N/A	Rio Puerco SVC	345 kV	Reactive Resource
Rita	**115 kV**	**No**	**N/A**			
Rodeo	**115 kV**	**No**	**N/A**			
Roy	**115 kV**	**No**	**N/A**			
Sagebrush (Q2 2024)	**115 kV**	**No**	**N/A**			
Sagebrush (elements)	–	No	N/A	PERS-SAGE1: Person-Sagebrush	115 kV	Line
Sagebrush (elements)	–	No	N/A	SAGE-SAND1: Sagebrush-Normally Open Switch SP-83 and HW-43	115 kV	Line
Sagebrush 1 & 2 (Q2 2028)	**115 kV**	**No**	**N/A**			
Saint Cecilia	**46 kV**	**No**	**N/A**			
Saint Cecilia (Q2 2024)	**115 kV**	**No**	**N/A**			
Saint Cecilia (elements)	–	No	N/A	LOMO-STCE1 St. Cecilia-Los Morros 115 kV Line	115kV	Line
Saint Cecilia (elements)	–	No	N/A	STCE-SURA1: Sun Ranch-St. Cecilia 115kV	115kV	Line
San Antonio (elements)	–	No	N/A	TA: San Antonio Tap 46 kV-San Antonio Substation	46 kV	Radial Line
San Antonito 1 & 2	**46 kV**	**No**	**N/A**			
San Juan 230	**345/230/69/12.47**	**Yes**	**TEP partial owner**			
San Juan 230 (elements)	–	No	N/A	230/12.47 kV Transformer	230/12.47	Transformer
San Juan 230 (elements)	–	No	N/A	230/69 kV Transformer (to radial CC line)	230/69kv	Transformer
San Juan 230 (elements)	–	No	N/A	345/69 kV Transformers (to radial CO line)	345/69kv	Transformer

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
San Juan 230 (elements)	_	No	N/A	SF: San Juan-Hogback 230 kV Line	230 kV	Line
San Juan 345	**345 kV**	**Yes**	**PNM & TEP - TOP, 5 Tos**			
San Juan 345 (elements)	_	No	N/A	345/230 kV Transformer	345/230kv	Transformer
San Juan 345 (elements)	_	No	N/A	WW: San Juan-Cabezon	345 kV	Line
San Juan 345 (elements)	_	No	N/A	FC: San Juan 345 kV-Four Corners 345 kV	345 kV	Line
San Juan 345 (elements)	_	No	N/A	SJ-MC-1: McKinley 345 kV-San Juan 345 kV	345 kV	Line
San Juan 345 (elements)	_	No	N/A	SJ-MC-2: McKinley 345 kV-San Juan 345 kV	345 kV	Line
San Juan 345 (elements)	_	No	N/A	SH: San Juan-Waterflow 345 kV Line	345 kV	Line
San Juan 345 (elements)	_	No	N/A	OC: San Juan 345 kV-Jicarilla 345 kV	345 kV	Line
San Juan 345 (elements)	_	No	N/A	SR: San Juan 345 kV-Shiprock 345 kV	345 kV	Line
San Juan 345 (elements)	_	No	N/A	San Juan 345 kV - San Juan North 345 kV	345 kV	Line
San Juan North (Q1 2024)	**345 kV**	**No**	N/A		**345 kV**	
San Juan North (elements)	_	No	N/A	San Juan North 345 kV - San Juan 345 kV -	345 kV	Line
San Juan North (elements)	_	No	N/A	San Juan Solar gen tie	345 kV	Gen Tie Line
San Lucas	**115 kV**	**No**	**N/A**			
San Lucas (elements)	_	No	N/A	LS: San Lucas Tap 115 kV-San Lucas Substation	115 kV	Line
San Pedro	**115 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
San Pedro (elements)	–	No	N/A	ST: San Pedro Tap 115kv-San Pedro Substation	115 kV	Line
Sandia	**46 kV**	**No**	**N/A**			
Sandia (elements)	–	No	N/A	ID: radial line	46 kV	Radial Line
Sandia (elements)	–	No	N/A	Sandia-Kirtland AFB East 2	46 kV	Line
Sandia (elements)	–	No	N/A	Sandia-Kirtland AFB East 3	46 kV	Line
Sandia (elements)	–	No	N/A	Sandia-Kirtland AFB East 4	46 kV	Line
Sandia (elements)	–	No	N/A	115/46 kV Transformer	46 kV	Transformer
Sandia (elements)	–	No	N/A	115/46 kV Transformer	46 kV	Transformer
Sandia (elements)	–	No	N/A	Sandia 1-2 Bus tie	46 kV	Bus Tie
Sandia (elements)	–	No	N/A	Sandia 46 kV Shunt Capacitor #1	46 kV	Reactive Resource
Sandia (elements)	–	No	N/A	Sandia 46 kV Shunt Capacitor #2	46 kV	Reactive Resource
Sandia (elements)	–	No	N/A	Sandia 46 kV Shunt Capacitor #3	46 kV	Reactive Resource
Sandia (elements)	–	No	N/A	Sandia 46 kV Shunt Capacitor #4	46 kV	Reactive Resource
Sandia 115	**115 kV**	**No**	**N/A**			
Sandia 115 (elements)	–	No	N/A	SE: Sandia 115 kV-Embudo 115 kV	115 kV	Line
Sandia 115 (elements)	–	No	N/A	KS: Sandia 115 kV-Kirtland 115 kV	115 kV	Line
Sandia 115 (elements)	–	No	N/A	Sandia 115/46 kV Transformer #1	115 kV	Transformer
Sandia 115 (elements)	–	No	N/A	Sandia 115/46 kV Transformer #2	115 kV	Transformer
Sandia 115 (elements)	–	No	N/A	CG: Sandia-Richmond 115 kV Line	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Sandia 115 (elements)	–	No	N/A	SP: Sandia 115 kV-Normally Open Switch SP-83	115 kV	Radial Line
Sandia 115 (elements)	–	No	N/A	KS: Sandia 115 kV-SNL	115 kV	Line
Sandia 115 (elements)	–	No	N/A	SAGE-SAND1: Sagebrush-Normally Open Switch SP-83 and HW-43	115 kV	Line
Sandia 115 (elements)	–	No	N/A	Sandia #1 Shunt Capacitors	115 kV	Reactive Resource
Sandia 115 (elements)	–	No	N/A	Sandia #2 Shunt Capacitors	115 kV	Reactive Resource
Sandia 345	**345 kV**	**No**	**N/A**			
Sandia 345 (elements)	–	No	N/A	Sandia 345/115 kV Transformer T1	345 kV	Transformer
Sandia 345 (elements)	–	No	N/A	Sandia 345/115 kV Transformer Out of Service Spare	345 kV	Transformer
Sandia 345 (elements)	–	No	N/A	PAJA-SAND1: Sandia 345 kV to Pajarito 345 kV	345 kV	Line
Santa Fe Plant	**46 kV**	**No**	**N/A**			
Sara 1 & 2	**115 kV**	**No**	**N/A**			
Sara 1 & 2 (elements)	–	No	N/A	CS: Sara 1&2 Tap 115 kV-Sara 1&2 Substation	115 kV	Line
Sara 3 & 4	**115 kV**	**No**	**N/A**			
Sara 3 & 4 (elements)	–	No	N/A	CT: Sara 3&4 Tap 115 kV-Sara 3&4 Substation	115 kV	Line
Sara 5	**115 kV**	**No**	**N/A**			
Sara 6 & 7	**115 kV**	**No**	**N/A**			
Sara 8	**115 kV**	**No**	**N/A**			
Scenic	**115 kV**	**No**	**N/A**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Scenic	**115 kV**	**No**	**N/A**			
Scenic (elements)	_	No	N/A	SK: Scenic - West Mesa 115 kV	115 kV	Line
Scenic (elements)	_	No	N/A	CE: Scenic - Pachmann 115 kV	115 kV	Line
Scenic (elements)	_	No	N/A	Scenic Sectionalizing Breaker	115 kV	Sectionalizing Breaker
Sewer Plant	**115 kV**	**No**	**N/A**			
Shiprock	**345 kV**	**Yes**	**WAPA - TOP**			
Shiprock (elements)	_	No	N/A	SR: San Juan 345 kV-Shiprock 345 kV	345 kV	Line
Shiprock (elements)	_	No	N/A	Shiprock - Four Corners 345 kV Line	345 kV	Line
Shiprock (elements)	_	No	N/A	Shiprock - Lost Canyon 230 kV line	345 kV	Line
Shiprock (elements)	_	No	N/A	Shiprock - Kayenta	345 kV	Line
Shiprock (elements)	_	No	N/A	Shiprock 345/230 kV Transformers	345 kV	Transformer
Signetics (elements)	_	No	N/A	SG: Signetics Tap-Signetics Substation	115 kV	Line
Signetics 1 & 2	**115 kV**	**No**	**N/A**			
Silver City	**69 kV**	**No**	**N/A**			
Silver City	**69 kV**	**No**	**N/A**			
Silver City (elements)	_	No	N/A	Silver City-Turquoise 69 kV Line	69 kV	Line
Silver City (elements)	_	No	N/A	Silver City-MD 69 kV Line	69 kV	Line
Silver City (elements)	_	No	N/A	Silver City Capacitor	69 kV	Reactive Resource

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Silver City (elements)	–	No	N/A	Silver City-North Silver 69 kV	69 kV	Line
Snow Vista	**115 kV**	**No**	**N/A**			
Snow Vista	**115 kV**	**No**	**N/A**			
Snow Vista (elements)	–	No	N/A	Sectionalizing Breaker		Sectionalizing Breaker
Snow Vista (elements)	115 kV	No	N/A	WJ: West Mesa - Snow Vista	115 kV	Line
Snow Vista (elements)	115 kV	No	N/A	PW: Person - Snow Vista 115 kV	115 kV	Line
Sol (Q2 2025)	**115 kV**	**No**	**N/A**			
Sol (elements)	–	No	N/A	Sol-Studio 115 kV line	115 kV	Line
Sol (elements)	–	No	N/A	Sandia-Sol 115 kV line	116 kV	Line
South Coors	**115 kV**	**No**	**N/A**			
South Pacheco (elements)	–	No	N/A	ZF: South PachecoTap 115 kV-South Pacheco Substation	115 kV	Line
South Pacheco 1 & 2	**115 kV**	**No**	**N/A**			
Springerville	**345 kV**	**Yes**	**TEP - TOP**			
Springerville (elements)	–	No	N/A	Springerville-McKinley 345 kV Line (MC-SP-1)	345 kV	Line
Springerville (elements)	–	No	N/A	Springerville-McKinley 345 kV Line (MC-SP-2)	345 kV	Line
Springerville (elements)	–	No	N/A	Springerville-Coronado 345 kV Line (SP-CO-1)	345 kV	Line
Springerville (elements)	–	No	N/A	GH: Springerville-Greenlee 345 kV Line (SP-GL-1)	345 kV	Line
Springerville (elements)	–	No	N/A	Springerville-Winchester 345 kV Line (SP-VL-1)	345 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Springerville (elements)	-	No	N/A	Macho Springs - 345 kV (El Paso)	345 kV	Line
St. Joseph	**115 kV**	**No**	**N/A**			
STA	**115 kV**	**No**	**LANL**			
STA (elements	-	No	N/A	RL: BA 115 kV-STA 115 kV	115 kV	Line
State Pen	**115 kV**	**No**	**N/A**			
Storrie Lake	**115 kV**	**No**	**TGST - TOP**			
Storrie Lake (elements)	-	No	N/A	VS: Valencia 115 kV-Storrie Lake 115 kV	115 kV	Line
Studio	**115 kV**	**No**	**N/A**			
Studio (Q4 2026)	**115 kV**	**No**	**N/A**			
Studio (elements)	-	No	N/A	PA: Studio Tap 115 kV-Studio Substation	115 kV	Line
Studio (elements)	-	No	N/A	PROS-STUD1 Prosperity-Studio 115	116 kV	Line
Studio (elements)	-	No	N/A	Sol-Studio 115 kV	115 kV	Line
Studio (elements)	-	No	N/A	Sectionalizing Breaker	115 kV	Sectionalizing Breaker
Sun Ranch (Q4 2023)	**115 kV**	**No**	N / A			
Sun Ranch (elements)	-	No	N/A	RTSN-SURA1: Sun Ranch-Rattlesnake 115 kV	115 kV	Line
Sun Ranch (elements)	-	No	N/A	BELN-SURA1 Sun Ranch-Belen 115 kV	115 kV	Line
Sun Ranch (elements)	-	No	N/A	STCE-SURA1: Sun Ranch-St. Cecilia 115 kV	115 kV	Line
Sun Ranch (elements)	-	No	N/A	STCE-SURA1: Sun Ranch to Los Morros 115 kV	115 kV	Line
Sun Ranch (elements)	-	No	N/A	SKRA-SURA1: Sun Ranch-Sky Ranch 115 kV (Gen Tie)	115 kV	Gen Tie Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Sun Ranch (elements)	–	No	N/A	Sun Ranch – Star Light 115 kV (Gen Tie)	115 kV	Gen Tie Line
Taiban Mesa	**345 kV**	**No**	**N/A**			
Taiban Mesa (elements)	–	No	N/A	TG: Taiban Mesa-Guadalupe 345 kV	345 kV	Line
Taiban Mesa (elements)	–	No	N/A	TB: Blackwater-Taiban 345 kV Line	345 kV	Line
Taiban Mesa (elements)	–	No	N/A	Taiban Mesa 345 kV-Lone Mesa 345 kV	345 kV	Gen Tie Line
Tijeras	**46 kV**	**No**	**N/A**			
Tome	**115 kV**	**No**	**N/A**			
Tome	**115 kV**	**No**	**N/A**			
Tome (elements)	–	No	N/A	TJ: Tome 115 kV-Belen 115 kV	115 kV	Line
Tome (elements)	–	No	N/A	TV: Tome 115 kV-VEF 115 kV	115 kV	Gen Tie Line
Tome (elements)	–	No	N/A	CK: College - Tome 115 kV	115 kV	Line
Tome (elements)	–	No	N/A	Tome 115/46 kV Transformer	115 kV	Transformer
Tome (elements)	–	No	N/A	PB: Person - Tome 115 kV	115 kV	Line
Tome 46	**46 kV**	**No**	**N/A**			
Tome 46 (elements)	–	No	N/A	BN: Tome-Person	46 kV	Line
Tome 46 (elements)	–	No	N/A	PB: Tome-Person	46 kV	Line
Tome 46 (elements)	–	No	N/A	115/46 kV Transformer	46 kV	Transformer
Tramway	**115 kV**	**No**	**N/A**			
Truman	**115 kV**	**No**	**N/A**			
Truman (elements)	–	No	N/A	TR: Truman Tap 115 kV-Truman Substation	115 kV	Radial Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Tularosa	**115 kV**	**No**	**N/A**			
Turquoise	**69 kV**	**No**	**N/A**			
Turquoise	**115 kV**	**No**	**N/A**			
Turquoise (elements)	–	No	N/A	Turquoise-Silver City 69 kV Line	69 kV	Line
Turquoise (elements)	–	No	N/A	Turquoise 115/69 kV Transformer	115 kV	Transformer
Turquoise (elements)	–	No	N/A	Turquoise-Burro Mountain 69 kV Line	69 kV	Line
Turquoise (elements)	–	No	N/A	TY: Turquoise 115 kV-Tyrone 115 kV	115 kV	Line
Turquoise (elements)	–	No	N/A	Tyrone 115/69 kV Transformer	115 kV	Transformer
Turquoise (elements)	–	No	N/A	MR: MD-1 115 kV-Turquoise 115 kV	115 kV	Line
Turquoise (elements)	–	No	N/A	HR: Hidalgo 115 kV-Turquoise 115 kV	115 kV	Line
Tyrone 69	**69 kV**	**No**	**N/A**			
United	**115 kV**	**No**	**N/A**			
UNM North Campus (elements)	–	No	N/A	UT: UNM North Campus Tap 115 kV-UNM North Campus Substation	115 kV	Radial Line
UNM North Campus Sub	**115 kV**	**No**	**N/A**			
UNM Unit Sub 1, 2 and 3	**115 kV**	**No**	**N/A**			
Unser	**115 kV**	**No**	**N/A**			
Valencia (2027)	**115kV**	**No**	N/A			
Valencia	**115 kV**	**No**	**N/A**			
Valencia (elements)	–	No	N/A	VS: Valencia 115 kV-Storrie Lake 115 kV	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Valencia (elements)	–	No	N/A	SL: Zia 115 kV-Valencia 115 kV	115 kV	Line
Valencia (elements)	–	No	N/A	Valencia Transformer 115/46 kV	115 kV	Transformer
Valencia (elements)	–	No	N/A	Valencia Shunt Capacitors	115 kV	Reactive Resource
Van Buren T1 & T4	**69 kV**	**No**	**N/A**			
Veranda	**115 kV**	**No**	**N/A**			
Veranda (elements)	–	No	N/A	RR: Veranda 115 kV-Corrales Bluff 115 kV	115 kV	Line
Veranda (elements)	–	No	N/A	PV: Rio Puerco 115 kV-Veranda 115 kV	115 kV	Line
Veranda (elements)	–	No	N/A	Dist - Veranda (Sectionalizing Breaker system)		Sectionalizing Breaker
Veranda 1 & 2	**115 kV**	**No**	**N/A**			
Volcano 1 & 2	**115 kV**	**No**	**N/A**			
Warner	**46 kV**	**No**	**N/A**			
Wayne	**115 kV**	**No**	**N/A**			
Wesmeco	**115 kV**	**No**	**N/A**			
Wesmeco (elements)	–	No	N/A	WC: Wesmeco Tap 115 kV-Wesmeco Tap Substation	115 kV	Radial Line
West Mesa 115/ 230 (elements)	–	No	N/A	WD: West Mesa 115 kV - Huning Ranch 115 kV	115 kV	Line
West Mesa 115/ 230 (elements)	–	No	N/A	SK: Scenic - West Mesa 115 kV	115 kV	Line
West Mesa 115/ 230 (elements)	–	No	N/A	PTRO-WSMS1 West Mesa to Petroglyph	115 kV	Line
West Mesa 115/ 230 (elements)	–	No	N/A	WJ: West Mesa - Snow Vista	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
West Mesa 115/ 230 (elements)	-	No	N/A	WR: West Mesa 115 kV-Irving 115 kV	115 kV	Line
West Mesa 115/ 230 (elements)	-	No	N/A	NW: Reeves 115 kV-West Mesa 115 kV	115 kV	Line
West Mesa 115/ 230 (elements)	-	No	N/A	WP: West Mesa 115 kV-Prager 115 kV	115 kV	Line
West Mesa 115/ 230 (elements)	-	No	N/A	KM: West Mesa 115 kV-Red Mesa 115 kV	115 kV	Line
West Mesa 115/ 230 (elements)	-	No	N/A	WV-PM: West Mesa 115 kV-Person (Volcano) 115 kV	115 kV	Line
West Mesa 115/ 230 (elements)	-	No	N/A	230/115 kV Transformer #1	230 kV	Transformer
West Mesa 115/ 230 (elements)	-	No	N/A	230/115 kV Transformer #2	230 kV	Transformer
West Mesa 115/ 230 (elements)	-	No	N/A	HU: West Mesa 115 kV - Huning Ranch 115 kV	115 kV	Line
West Mesa 115/ 230 (elements)	-	No	N/A	WA: West Mesa-Ambrosia 230 kV Line	230 kV	Line
West Mesa 115/ 230 (elements)	-	No	N/A	West Mesa #1 Shunt Capacitors	115 kV	Reactive Resource
West Mesa 115/ 230 (elements)	-	No	N/A	West Mesa #2 Shunt Capacitors	115 kV	Reactive Resource
West Mesa 115/ 230 (elements) (2031)	-	No	N/A	ASPN-WSMS1: Aspen-West Mesa	115 kV	Line
West Mesa 115/230	**115/230**	**No**	**N/A**			
West Mesa 345	**345 kV**	**No**	**N/A**			
West Mesa 345 (elements)	-	No	N/A	EP: West Mesa 345 kV-Arroyo 345 kV	345 kV	Line
West Mesa 345 (elements)	-	No	N/A	BJ: West Mesa-Rio Puerco 345 kV Line 1	345 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
West Mesa 345 (elements)	-	No	N/A	AJ: West Mesa-Rio Puerco 345 kV Line 2	345 kV	Line
West Mesa 345 (elements)	-	No	N/A	PAJA-WSMS1: West Mesa 345 kV - Pajarito 345kV	345 kV	Line
West Mesa 345 (elements)	-	No	N/A	345/115 kV Transformer #1	345 kV	Transformer
West Mesa 345 (elements)	-	No	N/A	345/115 kV Transformer #2	345 kV	Transformer
West Mesa 345 (elements)	-	No	N/A	West Mesa - EP Line Reactor	345 kV	Reactive Resource
West Mesa 345 (elements)	-	No	N/A	West Mesa AJ Reactor	345 kV	Reactive Resource
West Mesa 345 (elements)	-	No	N/A	QLRA-WSMS1 Quail Ranch-West Mesa 345 kV Line	345 kV	Line
Western Spirit	**345 kV**	**No**	**N/A**			
Western Spirit (elements)	-	No	N/A	CLCR-WESP1 Clines Corners to Western Spirit	345kV	Line
Western Spirit (elements)	-	No	N/A	HIMO-WESP 345 kV line	345 kV	Line
Western Spirit (elements)	-	No	N/A	CCWF-WESP1 Tie to Third Party Wind Farm	345kV	Gen Tie Line
Western Spirit (elements)	-	No	N/A	DMWF-WESP1 Tie to Third Party Wind Farm	345kV	Gen Tie Line
Western Spirit (elements)	-	No	N/A	Western Spirit-Hidden Mountain Line Shunt Reactor	345 kV	Reactive Resource
Western Spirit (elements)	-	No	N/A	Western Spirit - Hidden Mountain series Capacitor	345 kV	Line
Westwing	**500 kV**	**Yes**	**APS - TOP**			
Willard	**115 kV**	**No**	**TSGT - TO & TOP**			

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Willard (elements)	–	No	N/A	WL: Willard 115 kV-Belen 115 kV	115 kV	Line
Willard (elements)	–	No	N/A	TW: Britton 115 kV-Willard 115 kV	115 kV	Line
Winrock	**115 kV**	**No**	**N/A**			
Wyoming	**115 kV**	**No**	**N/A**			
Yah-ta-hey	**115/345**	**No**	**N/A**			
Yah-ta-hey (elements)	–	No	N/A	YN: Ya-Ta-Hey 115 kV-Coalmine 115 kV	115 kV	Radial Line
Yah-ta-hey (elements)	–	No	N/A	YP: Ya-Ta-Hey 115 kV-Pitt Midway Substation	115 kV	Radial Line
Yah-ta-hey (elements)	–	Yes	TSGT owns, PNM maintains	GYTH: Ya-Ta-Hey - PEGS 115 kV	115 kV	Line
Yah-ta-hey (elements)	–	No	N/A	AY: Ambrosia 115 115 kV-Ya-Ta-Hey 115 kV	115 kV	Line
Yah-ta-hey (elements)	–	No	N/A	Yah-ta-hey Transformer 345/ 115 kV	345 kV	Transformer
Yah-ta-hey (elements)	–	No	N/A	Yah-ta-hey Transformer 345/ 115 kV	345 kV	Transformer
Yah-ta-hey (elements)	–	No	N/A	Yah-Ta-Hey #1 Shunt Capacitors	115 kV	Reactive Resource
Yah-ta-hey (elements)	–	No	N/A	Yah-Ta-Hey #2 Shunt Capacitors	115 kV	Reactive Resource
Zafarano	**115 kV**	**No**	**N/A**			
Zamora	**46 kV**	**No**	**N/A**			
Zamora (elements)	–	No	N/A	TZ: Zamora Tap 46kV-Zamora Tap Substation	46 kV	Radial Line
Zia	**115 kV**	**No**	**N/A**			
Zia (elements)	–	No	N/A	ZIA: Zia 115 kV-Norton 115 kV/Algodones 115 kV	115 kV	Line

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Zia (elements)	_	No	N/A	ZF: Zia 115 kV-South Pacheco Substation	115 kV	Radial Line
Zia (elements)	_	No	N/A	SL: Zia 115 kV-Valencia 115 kV	115 kV	Line
Zia (elements)	_	No	N/A	RS: BA 115 kV-Zia 115 kV	115 kV	Line
Zia (elements)	_	No	N/A	3- 115/46 kV Zia Transformers	115 kV	Transformer
Zia (elements)	_	No	N/A	NS: Norton 115 kV-Zia 115 kV	115 kV	Line
Zia (elements)	_	No	N/A	Zia #1 Shunt Capacitors	115 kV	Reactive Resource
Zia (elements)	_	No	N/A	Zia #2 Shunt Capacitors	115 kV	Reactive Resource
Zia (elements)	_	No	N/A	Zia #3 Shunt Capacitors	115 kV	Reactive Resource
Zia (elements)	_	No	N/A	Zia #4 Shunt Capacitors	115 kV	Reactive Resource
Zia 46	**46 kV**	**No**	**N/A**			
Zia 46 (elements)	_	No	N/A	ZS: Zia-Power Plant	46 kV	Line
Zia 46 (elements)	_	No	N/A	ZM: Zia-Power Plant	46 kV	Line
Zia 46 (elements)	_	No	N/A	MS: Zia-Power Plant	46 kV	Line
Zia 46 (elements)	_	No	N/A	ZB: Zia radial (Santa Domingo)	46 kV	Radial Line
Zia 46 (elements)	_	No	N/A	Zia 1-2 bus tie	46 kV	Line
Zia 46 (elements)	_	No	N/A	115/46 kV Transformer	46 kV	Transformer
Zia 46 (elements)	_	No	N/A	115/46 kV Transformer	46 kV	Transformer
Zia 46 (elements)	_	No	N/A	115/46 kV Transformer	46 kV	Transformer
Zia 46 (elements)	_	No	N/A	Zia 46 kV Shunt Capacitor #1	46 kV	Reactive Resource

Station Name	Station Voltage Level(s)	Jointly Owned / Operated? Yes	Jointly Owned / Operated Details	Element Name (Lines, transformers, Reactive Resources)	Element Voltage (High side for transformers)	Element Type
Zia 46 (elements)	–	No	N/A	Zia 46 kV Shunt Capacitor #2	46 kV	Reactive Resource

TABLE F-2: EXISTING, PLANNED/UNDER CONSTRUCTION, AND FUTURE DISTRIBUTION SUBTATIONS

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
Alamogordo 1	**115 kV**			
	–	**Alamogordo North 115/12.47 lV Transformer**	**115 kV**	**Transformer**
	–	**A10010**	**115 kV**	**Line**
	–	**A10011**	**115 kV**	**Line**
	–	**A10012**	**115 kV**	**Line**
	–	**Alamogordo Middle 115/12.47 lV Transformer**	**115 kV**	**Transformer**
	–	**A10001**	**115 kV**	**Line**
	–	**A10002**	**115 kV**	**Line**
	–	**A10003**	**115 kV**	**Line**
	–	**Alamogordo South 115/12.47 lV Transformer**	**115 kV**	**Transformer**
	–	**A10083**	**115 kV**	**Line**
	–	**A10089**	**115 kV**	**Line**
	–	**A10097**	**115 kV**	**Line**
Alcazar	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Alcazar 115/12.47kV Transformer	115 kV	Transformer
	–	Alcazar 11	12.47 kV	Line
	–	Alcazar 12	12.47 kV	Line
	–	Alcazar 13	12.47 kV	Line
	–	Alcazar 14	12.47 kV	Line
Algodones	**115 kV**			
	–	Algodones 115/12.47kV Transformer	115 kV	Transformer
	–	Algodones 11	12.47 kV	Line
	–	Algodones 12	12.47 kV	Line
	–	Algodones 13	12.47 kV	Line
	–	Algodones 2 115/12.47kV Transformer	115 kV	Transformer
	–	Algodones 21	12.47 kV	Line
Alire	**46 kV**			
	–	Alire 46/12.47 kV Transformer	46 kV	Transformer
	–	Alire 11	12.47 kV	Line
	–	Alire 12	12.47 kV	Line
Anderson	**115 kV**			
	–	Anderson 115/12.47kV Transformer	115 kV	Transformer
	–	Anderson 11	12.47 kV	Line
	–	Anderson 12	12.47 kV	Line
	–	Anderson 13	12.47 kV	Line
Arno	**46 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Arno 46/12.47 kV Transformer	46 kV	Transformer
	–	Arno 11	12.47 kV	Line
	–	Arno 12	12.47 kV	Line
	–	Arno 13	12.47 kV	Line
	–	Arno 46/12.47 kV Transformer	46 kV	Transformer
	–	Arno 24	12.47 kV	Line
	–	Arno 25	12.47 kV	Line
	–	Arno 26	12.47 kV	Line
Arriba	**115 kV**			
	–	Arriba 115/12.47kV Transformer	115 kV	Transformer
	–	Arriba 11	12.47 kV	Line
	–	Arriba 12	12.47 kV	Line
	–	Arriba 13	12.47 kV	Line
	–	Arriba 14	12.47 kV	Line
Aspen	**115 kV**			
	–	Aspen 115/12.47kV Transformer	115 kV	Transformer
	–	Aspen 11	12.47 kV	Line
	–	Aspen 12	12.47 kV	Line
	–	Aspen 13	12.47 kV	Line
	–	Aspen 14	12.47 kV	Line
Avila	**115 kV**			
	–	Avila 115/12.47kV Transformer	115 kV	Transformer

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Avila 11	12.47 kV	Line
	–	Avila 12	12.47 kV	Line
	–	Avila 13	12.47 kV	Line
Baca	**46 kV**			
	–	Baca 46/12.47 kV Transformer	46 kV	Transformer
	–	Baca 11	12.47 kV	Line
	–	Baca 12	12.47 kV	Line
Ball Park	**46 kV**			
	–	Ball Park 46/4.16 kV Transformer	46 kV	Transformer
	–	Ball Park 11	4.16 kV	Line
	–	Ball Park 12	4.16 kV	Line
	–	Ball Park 13	4.16 kV	Line
	–	Ball Park 14	4.16 kV	Line
Beckner	**115 kV**			
	–	Beckner 1 115/12.47kV Transformer	115 kV	Transformer
	–	Beckner 11	12.47 kV	Line
	–	Beckner 12	12.47 kV	Line
	–	Beckner 13	12.47 kV	Line
	–	Beckner 14	12.47 kV	Line
	–	Beckner 2 115/12.47kV Transformer	115 kV	Transformer
	–	Beckner 21	12.47 kV	Line
	–	Beckner 22	12.47 kV	Line
	–	Beckner 23	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Beckner 24	12.47 kV	Line
Bel Air	**115 kV**			
	–	Bel Air 115/12.47kV Transformer	115 kV	Transformer
	–	Bel Air 11	12.47 kV	Line
	–	Bel Air 12	12.47 kV	Line
	–	Bel Air 13	12.47 kV	Line
	–	Bel Air 14	12.47 kV	Line
Beverly Wood	**115 kV**			
	–	Beverly Wood 115/12.47kV Transformer	115 kV	Transformer
	–	Beverly Wood 11	12.47 kV	Line
	–	Beverly Wood 12	12.47 kV	Line
	–	Beverly Wood 13	12.47 kV	Line
Black Ranch	**115 kV**			
	–	Black Ranch 115/12.47kV Transformer	115 kV	Transformer
	–	Black Ranch 11	12.47 kV	Line
	–	Black Ranch 12	12.47 kV	Line
	–	Black Ranch 13	12.47 kV	Line
	–	Black Ranch 14	12.47 kV	Line
	–	Black Ranch 2 115/12.47kV Transformer	115 kV	Transformer
	–	Black Ranch 21	12.47 kV	Line
	–	Black Ranch 22	12.47 kV	Line
	–	Black Ranch 23	12.47 kV	Line
	–	Black Ranch 24	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
Bosque Farms	**115 kV**			
	–	Bosque Farms 1 115/12.47kV Transformer	115 kV	Transformer
	–	Bosque Farms 11	12.47 kV	Line
	–	Bosque Farms 12	12.47 kV	Line
Buckman	**115 kV**			
	–	Buckman 1 115/12.47kV Transformer	115 kV	Transformer
	–	Buckman 11	12.47 kV	Line
	–	Buckman 12	12.47 kV	Line
	–	Buckman 2 115/12.47kV Transformer	115 kV	Transformer
	–	Buckman 21	12.47 kV	Line
	–	Buckman 22	12.47 kV	Line
	–	Buckman 23	12.47 kV	Line
Burro Mountain	**69 kV**			
	–	Burro Mountain 69/12.47 kV Transformer	69 kV	Transformer
	–	Burro Mountain 7-160	12.47 kV	Line
	–	Burro Mountain 7-387	12.47 kV	Line
Caja Del Rio	**115 kV**			
	–	Caja Del Rio 115/12.47kV Transformer	115 kV	Transformer
	–	Caja Del Rio 11	12.47 kV	Line
	–	Caja Del Rio 12	12.47 kV	Line
	–	Caja Del Rio 13	12.47 kV	Line
	–	Caja Del Rio 14	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
Camel Tracks	**46 kV**			
	–	Camel Tracks 46/12.47 kV Transformer	46 kV	Transformer
	–	Camel Tracks 11	12.47 kV	Line
	–	Camel Tracks 12	12.47 kV	Line
	–	Camel Tracks 13	12.47 kV	Line
Capitol	**46 kV**			
	–	Capitol 46/4.16 kV Transformer	46 kV	Transformer
	–	Capitol 11	4.16 kV	Line
	–	Capitol 12	4.16 kV	Line
Central	**115 kV**			
	–	Central 115/12.47kV Transformer	115 kV	Transformer
	–	Central 11	12.47 kV	Line
	–	Central 12	12.47 kV	Line
	–	Central 13	12.47 kV	Line
	–	Central 14	12.47 kV	Line
Church Rock	**115 kV**			
	–	Church Rock 115/12.47kV Transformer	115 kV	Transformer
Claremont	**115 kV**			
	–	Claremont 1 115/12.47kV Transformer	115 kV	Transformer
	–	Claremont 11	12.47 kV	Line
	–	Claremont 12	12.47 kV	Line
	–	Claremont 13	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Claremont 14	12.47 kV	Line
	–	Claremont 2 115/12.47kV Transformer	115 kV	Transformer
	–	Claremont 21	12.47 kV	Line
	–	Claremont 22	12.47 kV	Line
	–	Claremont 23	12.47 kV	Line
	–	Claremont 24	12.47 kV	Line
Coal	**115 kV**			
	–	Coal 115/12.47kV Transformer	115 kV	Transformer
	–	Coal 11	12.47 kV	Line
	–	Coal 12	12.47 kV	Line
	–	Coal 13	12.47 kV	Line
	–	Coal 14	12.47 kV	Line
Cochiti	**46 kV**			
	–	Cochiti 46/12.47 kV Transformer	46 kV	Transformer
	–	Cochiti 11	12.47 kV	Line
	–	Cochiti 12	12.47 kV	Line
Colinas	**115 kV**			
	–	Colinas 115/12.47kV Transformer	115 kV	Transformer
	–	Colinas 11	12.47 kV	Line
	–	Colinas 12	12.47 kV	Line
	–	Colinas 13	12.47 kV	Line
College	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	College 115/12.47kV Transformer	115 kV	Transformer
	–	College 11	12.47 kV	Line
	–	College 12	12.47 kV	Line
	–	College 13	12.47 kV	Line
	–	College 14	12.47 kV	Line
Cornell	**115 kV**			
	–	Cornell 115/12.47kV Transformer	115 kV	Transformer
	–	Cornell 11	12.47 kV	Line
	–	Cornell 12	12.47 kV	Line
	–	Cornell 13	12.47 kV	Line
	–	Cornell 14	12.47 kV	Line
Corrales Bluffs	**115 kV**			
	–	Corrales Bluff 115/12.47kV Transformer	115 kV	Transformer
	–	Corrales Bluff 11	12.47 kV	Line
	–	Corrales Bluff 12	12.47 kV	Line
	–	Corrales Bluff 13	12.47 kV	Line
	–	Corrales Bluff 14	12.47 kV	Line
Cottonwood	**115 kV**			
	–	Cottonwood 1 115/12.47kV Transformer	115 kV	Transformer
	–	Cottonwood 11	12.47 kV	Line
	–	Cottonwood 12	12.47 kV	Line
	–	Cottonwood 13	12.47 kV	Line
	–	Cottonwood 14	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Cottonwood 2 115/12.47kV Transformer	115 kV	Transformer
	–	Cottonwood 21	12.47 kV	Line
	–	Cottonwood 22	12.47 kV	Line
	–	Cottonwood 23	12.47 kV	Line
	–	Cottonwood 24	12.47 kV	Line
Cuchilla	**115 kV**			
	–	Cuchilla 115/12.47kV Transformer	115 kV	Transformer
	–	Cuchilla 11	12.47 kV	Line
	–	Cuchilla 12	12.47 kV	Line
Deming East & West	**115 kV**			
	–	Deming East 115/13.8kV Transformer	115 kV	Transformer
	–	Deming East 11	13.8 kV	Line
	–	Deming East 12	13.8 kV	Line
	–	Deming East 13	13.8 kV	Line
	–	Deming West 115/13.8kV Transformer	115 kV	Transformer
	–	Deming West 11	13.8 kV	Line
	–	Deming West 12	13.8 kV	Line
	–	Deming West 13	13.8 kV	Line
Eastridge	**115 kV**			
	–	Eastridge 115/12.47kV Transformer	115 kV	Transformer
	–	Eastridge 11	12.47 kV	Line
	–	Eastridge 12	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Eastridge 13	12.47 kV	Line
	–	Eastridge 14	12.47 kV	Line
El Cerro	**115 kV**			
	–	El Cerro 115/12.47kV Transformer	115 kV	Transformer
	–	El Cerro 11	12.47 kV	Line
	–	El Cerro 12	12.47 kV	Line
	–	El Cerro 13	12.47 kV	Line
El Dorado	**115 kV**			
	–	El Dorado 115/12.47kV Transformer	115 kV	Transformer
	–	El Dorado 11	12.47 kV	Line
	–	El Dorado 12	12.47 kV	Line
Embudo	**115 kV**			
	–	Embudo 115/12.47kV Transformer	115 kV	Transformer
	–	Embudo 11	12.47 kV	Line
	–	Embudo 12	12.47 kV	Line
	–	Embudo 13	12.47 kV	Line
	–	Embudo 14	12.47 kV	Line
Enchanted Hills	**115 kV**			
	–	Enchanted Hills 115/12.47kV Transformer	115 kV	Transformer
	–	Enchanted Hills 11	12.47 kV	Line
	–	Enchanted Hills 12	12.47 kV	Line
	–	Enchanted Hills 13	12.47 kV	Line
	–	Enchanted Hills 14	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
First Street	**115 kV**			
	–	First Street 115/12.47kV Transformer	115 kV	Transformer
	–	First Street 11	12.47 kV	Line
	–	First Street 12	12.47 kV	Line
	–	First Street 13	12.47 kV	Line
	–	First Street 14	12.47 kV	Line
Fort Marcy	**46 kV**			
	–	Fort Marcy 46/12.47 kV Transformer	46 kV	Transformer
	–	Fort Marcy 11	12.47 kV	Line
	–	Fort Marcy 12	12.47 kV	Line
	–	Fort Marcy 13	12.47 kV	Line
	–	Fort Marcy 14	12.47 kV	Line
Four Hills	**115 kV**			
	–	Four Hills 115/12.47kV Transformer	115 kV	Transformer
	–	Four Hills 11	12.47 kV	Line
	–	Four Hills 12	12.47 kV	Line
	–	Four Hills 13	12.47 kV	Line
	–	Four Hills 14	12.47 kV	Line
Gallinas	**115 kV**			
	–	Gallinas North 115/12.47kV Transformer	115 kV	Transformer
	–	Gallinas 11	12.47 kV	Line
	–	Gallinas 12	12.47 kV	Line
	–	Gallinas 14	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
Gary Stephenson (2028)	**115 kV**			
Gary Stephenson 1 (2028)	**115 kV**			
	–	Gary Stephenson 11	12.47 kV	Line
	–	Gary Stephenson 12	12.47 kV	Line
	–	Gary Stephenson 13	12.47 kV	Line
	–	Gary Stephenson 14	12.47 kV	Line
Gary Stephenson 2 (2028)	**115 kV**			
	–	Gary Stephenson 21	12.47 kV	Line
	–	Gary Stephenson 22	12.47 kV	Line
	–	Gary Stephenson 23	12.47 kV	Line
	–	Gary Stephenson 24	12.47 kV	Line
Gavilan	**115 kV**			
	–	Gavilan North 115/12.47kV Transformer	115 kV	Transformer
	–	Gavilan 12-10	12.47 kV	Line
	–	Gavilan 12-30	12.47 kV	Line
	–	Gavilan South 115/12.47kV Transformer	115 kV	Transformer
	–	Gavilan 12-00	12.47 kV	Line
Girard	**115 kV**			
	–	Girard 115/12.47kV Transformer	115 kV	Transformer
	–	Girard 11	12.47 kV	Line
	–	Girard 12	12.47 kV	Line
	–	Girard 13	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Girard 14	12.47 kV	Line
Gold	**115 kV**			
	–	Gold 115/13.8kV Transformer	115 kV	Transformer
	–	Gold 11	13.8 kV	Line
	–	Gold 12	13.8 kV	Line
	–	Gold 13	13.8 kV	Line
Halona	**46 kV**			
	–	Halona 46/4.16 kV Transformer	46 kV	Transformer
	–	Halona 11	4.16 kV	Line
	–	Halona 12	4.16 kV	Line
	–	Halona 14	4.16 kV	Line
Hamilton	**115 kV**			
	–	Hamilton 1 115/12.47kV Transformer	115 kV	Transformer
	–	Hamilton 11	12.47 kV	Line
	–	Hamilton 12	12.47 kV	Line
	–	Hamilton 13	12.47 kV	Line
	–	Hamilton 14	12.47 kV	Line
	–	Hamilton 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Hamilton 21	12.47 kV	Line
	–	Hamilton 22	12.47 kV	Line
	–	Hamilton 23	12.47 kV	Line
	–	Hamilton 24	12.47 kV	Line
Hawkins	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Hawkins 1 115/12.47kV Transformer	115 kV	Transformer
	–	Hawkins 11	12.47 kV	Line
	–	Hawkins 12	12.47 kV	Line
	–	Hawkins 13	12.47 kV	Line
	–	Hawkins 14	12.47 kV	Line
	–	Hawkins 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Hawkins 21	12.47 kV	Line
	–	Hawkins 22	12.47 kV	Line
	–	Hawkins 23	12.47 kV	Line
	–	Hawkins 24	12.47 kV	Line
Hazeldine	**46 kV**			
	–	Hazeldine 2 46/4.16 kV Transformer	46 kV	Transformer
	–	Hazeldine 11	4.16 kV	Line
	–	Hazeldine 12	4.16 kV	Line
Hermanas	**115 kV**			
	–	Hermanas 115/13.8 kV Transformer	115 kV	Transformer
	–	Hermanas 11	13.8 kV	Line
	–	Hermanas 12	13.8 kV	Line
	–	Hermanas 13	13.8 kV	Line
	–	Hermanas 14	13.8 kV	Line
Hickox	**46 kV**			
	–	Hickox 2 46/4.16 kV Transformer	46 kV	Transformer

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Hickox 11	4.16 kV	Line
	–	Hickox 12	4.16 kV	Line
Hollywood (Ruidoso)	**115 kV**			
	–	Hollywood North 115/12.47kV Transformer	115 kV	Transformer
	–	Hollywood 12-123	12.47 kV	Line
	–	Hollywood South 115/12.47kV Transformer	115 kV	Transformer
	–	Hollywood 12-126	12.47 kV	Line
Hondale	**115 kV**			
	–	Hondale 115/13.8 kV Transformer	115 kV	Transformer
	–	Hondale 11	13.8 kV	Line
	–	Hondale 12	13.8 kV	Line
Indian Hospital	**115 kV**			
	–	Indian Hospital 115/12.47kV Transformer	115 kV	Transformer
	–	Indian Hospital 11	12.47 kV	Line
	–	Indian Hospital 12	12.47 kV	Line
	–	Indian Hospital 13	12.47 kV	Line
	–	Indian Hospital 14	12.47 kV	Line
Inez	**115 kV**			
	–	Inez 115/12.47kV Transformer	115 kV	Transformer
	–	Inez 11	12.47 kV	Line
	–	Inez 12	12.47 kV	Line
Innovation	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Innovation 115/12.47kV Transformer	115 kV	Transformer
	–	Innovation 11	12.47 kV	Line
	–	Innovation 12	12.47 kV	Line
	–	Innovation 13	12.47 kV	Line
	–	Innovation 14	12.47 kV	Line
Iris	**115 kV**			
	–	Iris 115/12.47kV Transformer	115 kV	Transformer
	–	Iris 11	12.47 kV	Line
	–	Iris 12	12.47 kV	Line
	–	Iris 13	12.47 kV	Line
	–	Iris 14	12.47 kV	Line
Iron Street	**46 kV**			
	–	Iron Street 1 46/12.47 kV Transformer	46 kV	Transformer
	–	Iron Street 2 46/12.47 kV Transformer	46 kV	Transformer
	–	Iron Street 11	12.47 kV	Line
	–	Iron Street 12	12.47 kV	Line
	–	Iron Street 13	12.47 kV	Line
	–	Iron Street 14	12.47 kV	Line
	–	Iron Street21	12.47 kV	Line
	–	Iron Street 22	12.47 kV	Line
	–	Iron Street 23	12.47 kV	Line
	–	Iron Street 24	12.47 kV	Line
Isleta	**46 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Isleta 46/12.47 kV Transformer	46 kV	Transformer
	–	Isleta 11	12.47 kV	Line
	–	Isleta 12	12.47 kV	Line
Jarales	**115 kV**			
	–	Jarales 115/12.47kV Transformer	115 kV	Transformer
	–	Jarales 11	12.47 kV	Line
	–	Jarales 12	12.47 kV	Line
	–	Jarales 13	12.47 kV	Line
	–	Jarales 14	12.47 kV	Line
Jefferson	**115 kV**			
	–	Jefferson 115/12.47kV Transformer	115 kV	Transformer
	–	Jefferson 11	12.47 kV	Line
Juan Tabo	**115 kV**			
	–	Juan Tabo 115/12.47kV Transformer	115 kV	Transformer
	–	Juan Tabo 11	12.47 kV	Line
	–	Juan Tabo 12	12.47 kV	Line
	–	Juan Tabo 13	12.47 kV	Line
	–	Juan Tabo 14	12.47 kV	Line
Kaiser	**46 kV**			
	–	Kaiser 46/4.16 kV Transformer	46 kV	Transformer
	–	Kaiser 11	4.16 kV	Line
Keleher	**46 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Keleher 46/4.16 kV Transformer	46 kV	Transformer
	–	Keleher 11	4.16 kV	Line
	–	Keleher 12	4.16 kV	Line
	–	Keleher 13	4.16 kV	Line
Kewa	**115 kV**			
	–	Kewa 115/12.47kV Transformer	115 kV	Transformer
	–	Kewa 11	12.47 kV	Line
	–	Kewa 12	12.47 kV	Line
	–	Kewa 13	12.47 kV	Line
La Bajada	**46 kV**			
	–	La Bajada 46/12.47kV Transformer	46 kV	Transformer
	–	La Bajada 11	12.47 kV	Line
La Morada	**115 kV**			
	–	La Morada 115/12.47kV Transformer	115 kV	Transformer
	–	La Morada 11	12.47 kV	Line
	–	La Morada 12	12.47 kV	Line
	–	La Morada 13	12.47 kV	Line
	–	La Morada 14	12.47 kV	Line
Lawrence	**115 kV**			
	–	Lawrence 115/12.47kV Transformer	115 kV	Transformer
	–	Lawrence 11	12.47 kV	Line
	–	Lawrence 12	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Lawrence 13	12.47 kV	Line
	–	Lawrence 14	12.47 kV	Line
Lenkurt	**115 kV**			
	–	Lenkurt 115/12.47kV Transformer	115 kV	Transformer
	–	Lenkurt 11	12.47 kV	Line
	–	Lenkurt 12	12.47 kV	Line
	–	Lenkurt 13	12.47 kV	Line
	–	Lenkurt 14	12.47 kV	Line
Leyendecker	**115 kV**			
	–	Leyendecker 115/12.47kV Transformer	115 kV	Transformer
	–	Leyendecker 11	12.47 kV	Line
	–	Leyendecker 12	12.47 kV	Line
	–	Leyendecker 13	12.47 kV	Line
	–	Leyendecker 14	12.47 kV	Line
Lomas	**115 kV**			
	–	Lomas 115/12.47kV Transformer	115 kV	Transformer
	–	Lomas 11	12.47 kV	Line
	–	Lomas 12	12.47 kV	Line
	–	Lomas 13	12.47 kV	Line
	–	Lomas 14	12.47 kV	Line
	–	Lomas 15	12.47 kV	Line
	–	Lomas 16	12.47 kV	Line
Lordsburg	**69 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Lordsburg T1 69/12.47kV Transformer	69 kV	Transformer
	–	Lordsburg 1000	12.47 kV	Line
	–	Lordsburg T2 69/12.47kV Transformer	69 kV	Transformer
	–	Lordsburg 318	12.47 kV	Line
Los Angeles	**115 kV**			
	–	Los Angeles 115/12.47kV Transformer	115 kV	Transformer
	–	Los Angeles 11	12.47 kV	Line
	–	Los Angeles 12	12.47 kV	Line
	–	Los Angeles 13	12.47 kV	Line
Los Chavez	**46 kV**			
	–	Los Chavez 46/12.47kV Transformer	46 kV	Transformer
	–	Los Chavez 11	12.47 kV	Line
	–	Los Chavez 12	12.47 kV	Line
Los Lunas	**46 kV**			
	–	Los Lunas 46/12.47kV Transformer	46 kV	Transformer
	–	Los Lunas 11	12.47 kV	Line
	–	Los Lunas 12	12.47 kV	Line
Los Morros	**115 kV**			
	–	Los Morros 1 115/12.47kV Transformer	115 kV	Transformer
	–	Los Morros 11	12.47 kV	Line
	–	Los Morros 12	12.47 kV	Line
	–	Los Morros 13	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Los Morros 14	12.47 kV	Line
	–	Los Morros 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Los Morros 21	12.47 kV	Line
	–	Los Morros 22	12.47 kV	Line
	–	Los Morros 23	12.47 kV	Line
	–	Los Morros 24	12.47 kV	Line
Lost Horizon	**115 kV**			
	–	Lost Horizon 115/12.47kV Transformer	115 kV	Transformer
	–	Lost Horizon 11	12.47 kV	Line
	–	Lost Horizon 12	12.47 kV	Line
	–	Lost Horizon 13	12.47 kV	Line
	–	Lost Horizon 14	12.47 kV	Line
Louden Hills	**115 kV**			
	–	Louden Hills 115/12.47kV Transformer	115 kV	Transformer
	–	Louden Hills 11	12.47 kV	Line
	–	Louden Hills 12	12.47 kV	Line
Manhattan	**46 kV**			
	–	Manhattan 46/12.47kV Transformer	46 kV	Transformer
	–	Manhattan 11	12.47 kV	Line
	–	Manhattan 12	12.47 kV	Line
Manzanita	**46 kV**			
	–	Manzanita 1 46/12.47kV Transformer	46 kV	Transformer

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Manzanita 11	12.47 kV	Line
	–	Manzanita 12	12.47 kV	Line
	–	Manzanita 2 115/12.47kV Transformer	115 kV	Transformer
	–	Manzanita 21	12.47 kV	Line
	–	Manzanita 22	12.47 kV	Line
Manzano	**115 kV**			
	–	Manzano 115/12.47kV Transformer	115 kV	Transformer
	–	Manzano 11	12.47 kV	Line
	–	Manzano 12	12.47 kV	Line
	–	Manzano 13	12.47 kV	Line
Mariposa	**115 kV**			
	–	Mariposa 115/12.47kV Transformer	115 kV	Transformer
	–	Mariposa 11	12.47 kV	Line
	–	Mariposa 12	12.47 kV	Line
	–	Mariposa 13	12.47 kV	Line
	–	Mariposa 14	12.47 kV	Line
Marquez	**115 kV**			
	–	Marquez 115/12.47 kV Transformer	115 kV	Transformer
	–	Marquez 11	12.47 kV	Line
	–	Marquez 12	12.47 kV	Line
MD-1	**69 kV**			
	–	MD-11 69/23.5 kV Transformer	69 kV	Transformer

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	MD-1 11	23.5 kV	Line
	–	MD-1 12	23.5 kV	Line
	–	MD-1 13	23.5 kV	Line
	–	MD-1 14	23.5 kV	Line
	–	MD-1 T1 North 69/23.5 kV Transformer	69 kV	Transformer
	–	MD-1 T2 South 69/23.5 kV Transformer	69 kV	Transformer
Mejia	**115 kV**			
	–	Mejia 115/12.47kV Transformer	115 kV	Transformer
	–	Mejia 11	12.47 kV	Line
	–	Mejia 12	12.47 kV	Line
	–	Mejia 13	12.47 kV	Line
	–	Mejia 14	12.47 kV	Line
Menaul	**115 kV**			
	–	Menaul 115/12.47kV Transformer	115 kV	Transformer
	–	Menaul 11	12.47 kV	Line
	–	Menaul 12	12.47 kV	Line
	–	Menaul 13	12.47 kV	Line
	–	Menaul 14	12.47 kV	Line
	–	Menaul 15	12.47 kV	Line
	–	Menaul 16	12.47 kV	Line
Miguel Lujan	**115 kV**			
	–	Miguel Lujan 115/12.47kV Transformer	115 kV	Transformer

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Miguel Lujan 11	12.47 kV	Line
	–	Miguel Lujan 12	12.47 kV	Line
	–	Miguel Lujan 13	12.47 kV	Line
	–	Miguel Lujan 14	12.47 kV	Line
Mission	**115 kV**			
	–	Mission 1 115/12.47kV Transformer	115 kV	Transformer
	–	Mission 11	12.47 kV	Line
	–	Mission 12	12.47 kV	Line
	–	Mission 13	12.47 kV	Line
	–	Mission 14	12.47 kV	Line
	–	Mission 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Mission 21	12.47 kV	Line
	–	Mission 22	12.47 kV	Line
	–	Mission 23	12.47 kV	Line
	–	Mission 24	12.47 kV	Line
Montano	**115 kV**			
	–	Montano 115/12.47kV Transformer	115 kV	Transformer
	–	Montano 11	12.47 kV	Line
	–	Montano 12	12.47 kV	Line
	–	Montano 13	12.47 kV	Line
	–	Montano 14	12.47 kV	Line
Montgomery Plaza	**115 kV**			
	–	Montgomery Plaza 115/12.47kV Transformer	115 kV	Transformer

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Montgomery Plaza 11	12.47 kV	Line
	–	Montgomery Plaza 12	12.47 kV	Line
	–	Montgomery Plaza 13	12.47 kV	Line
	–	Montgomery Plaza 14	12.47 kV	Line
Morris	**115 kV**			
	–	Morris 115/12.47kV Transformer	115 kV	Transformer
	–	Morris 11	12.47 kV	Line
	–	Morris 12	12.47 kV	Line
	–	Morris 13	12.47 kV	Line
	–	Morris 14	12.47 kV	Line
	–	Morris 15	12.47 kV	Line
	–	Morris 16	12.47 kV	Line
North	**115 kV**			
	–	North 1 115/12.47kV Transformer	115 kV	Transformer
	–	North 11	12.47 kV	Line
	–	North 12	12.47 kV	Line
	–	North 13	12.47 kV	Line
	–	North 14	12.47 kV	Line
	–	North 2 115/12.47 kV Transformer	115 kV	Transformer
	–	North 21	12.47 kV	Line
	–	North 22	12.47 kV	Line
	–	North 23	12.47 kV	Line
	–	North 24	12.47 kV	Line
North Bernalillo	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	North Bernalillo 115/12.47kV Transformer	115 kV	Transformer
	–	North Bernalillo 11	12.47 kV	Line
	–	North Bernalillo 12	12.47 kV	Line
	–	North Bernalillo 13	12.47 kV	Line
	–	North Bernalillo 14	12.47 kV	Line
North Silver	**69 kV**			
	–	North Silver 69/12.47 kV Transformer	69 kV	Transformer
	–	North Silver 12-1061	12.47 kV	Line
	–	North Silver 12-1065	12.47 kV	Line
Ortiz	**115 kV**			
	–	Ortiz 115/12.47kV Transformer	115 kV	Transformer
	–	Ortiz 11	12.47 kV	Line
	–	Ortiz 12	12.47 kV	Line
	–	Ortiz 13	12.47 kV	Line
	–	Ortiz 14	12.47 kV	Line
Pachmann	**115 kV**			
	–	Pachmann 115/12.47kV Transformer	115 kV	Transformer
	–	Pachmann 11	12.47 kV	Line
	–	Pachmann 12	12.47 kV	Line
	–	Pachmann 13	12.47 kV	Line
	–	Pachmann 14	12.47 kV	Line
Palace	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Palace 115/12.47kV Transformer	115 kV	Transformer
	–	Palace 11	12.47 kV	Line
	–	Palace 12	12.47 kV	Line
	–	Palace 13	12.47 kV	Line
Palm	**115 kV**			
	–	Palm 115/12.47kV Transformer	115 kV	Transformer
	–	Palm 11	12.47 kV	Line
	–	Palm 12	12.47 kV	Line
	–	Palm 13	12.47 kV	Line
	–	Palm 14	12.47 kV	Line
Palomas (2028)	**115 kV**			
	–	Palomas 1 115/12.47kV Transformer	115 kV	Transformer
	–	Palomas 11	12.47 kV	Line
	–	Palomas 12	12.47 kV	Line
	–	Palomas 13	12.47 kV	Line
	–	Palomas 14	12.47 kV	Line
	–	Palomas 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Palomas 21	12.47 kV	Line
	–	Palomas 22	12.47 kV	Line
	–	Palomas 23	12.47 kV	Line
	–	Palomas 24	12.47 kV	Line
Panorama	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Panorama 115/12.47kV Transformer	115 kV	Transformer
	–	Panorama 11	12.47 kV	Line
	–	Panorama 12	12.47 kV	Line
	–	Panorama 13	12.47 kV	Line
Paradise Hills	**115 kV**			
	–	Paradise Hills 1 115/12.47kV Transformer	115 kV	Transformer
	–	Paradise Hills 11	12.47 kV	Line
	–	Paradise Hills 12	12.47 kV	Line
	–	Paradise Hills 13	12.47 kV	Line
	–	Paradise Hills 14	12.47 kV	Line
	–	Paradise Hills 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Paradise Hills 21	12.47 kV	Line
	–	Paradise Hills 22	12.47 kV	Line
	–	Paradise Hills 23	12.47 kV	Line
	–	Paradise Hills 24	12.47 kV	Line
Pecos	**46 kV**			
	–	Pecos 46/12.47kV Transformer	46 kV	Transformer
	–	Pecos 11	12.47 kV	Line
	–	Pecos 12	12.47 kV	Line
Peralta	**46 kV**			
	–	Peralta 46/12.47kV Transformer	46 kV	Transformer
	–	Peralta 11	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Peralta 12	12.47 kV	Line
Perrin (2031)	**115 kV**			
	–	Perrin 1 115/23.5 kV Transformer	115 kV	Transformer
	–	Perrin 2 115/23.5 kV Transformer	115 kV	Transformer
	–	Perrin 11	23.5 kV	Line
	–	Perrin 12	23.5 kV	Line
	–	Perrin 13	23.5 kV	Line
Petroglyph	**115 kV**			
	–	Petroglyph 115/12.47kV Transformer	115 kV	Transformer
	–	Petroglyph 11	12.47 kV	Line
	–	Petroglyph 12	12.47 kV	Line
	–	Petroglyph 13	12.47 kV	Line
	–	Petroglyph 14	12.47 kV	Line
Power Plant	**46 kV**			
	–	Power Plant 46/4.16kV Transformer	46 kV	Transformer
	–	Power Plant 11	4.16 kV	Line
	–	Power Plant 12	4.16 kV	Line
	–	Power Plant 13	4.16 kV	Line
Prager	**115 kV**			
	–	Prager 115/12.47kV Transformer	115 kV	Transformer
	–	Prager 11	12.47 kV	Line
	–	Prager 12	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Prager 13	12.47 kV	Line
	–	Prager 14	12.47 kV	Line
Princess Jeanne	**115 kV**			
	–	Princess Jeanne 115/12.47kV Transformer	115 kV	Transformer
	–	Princess Jeanne 11	12.47 kV	Line
	–	Princess Jeanne 12	12.47 kV	Line
	–	Princess Jeanne 13	12.47 kV	Line
	–	Princess Jeanne 14	12.47 kV	Line
Progress	**115 kV**			
	–	Progress 1 115/12.47kV Transformer	115 kV	Transformer
	–	Progress 11	12.47 kV	Line
	–	Progress 12	12.47 kV	Line
	–	Progress 13	12.47 kV	Line
	–	Progress 14	12.47 kV	Line
	–	Progress 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Progress 21	12.47 kV	Line
Prosperity	**115 kV**			
	–	Prosperity 115/12.47kV Transformer	115 kV	Transformer
	–	Prosperity 11	12.47 kV	Line
	–	Prosperity 12	12.47 kV	Line
	–	Prosperity 13	12.47 kV	Line
	–	Prosperity 14	12.47 kV	Line
Randolph	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Randolph 115/12.47kV Transformer	115 kV	Transformer
	–	Randolph 11	12.47 kV	Line
	–	Randolph 12	12.47 kV	Line
	–	Randolph 13	12.47 kV	Line
	–	Randolph 14	12.47 kV	Line
	–	Randolph 15	12.47 kV	Line
	–	Randolph 16	12.47 kV	Line
Rattlesnake (2028)	**115 kV**			
	–	Rattlesnake 115/12.47kV Transformer	115 kV	Transformer
	–	Rattlesnake 11	12.47 kV	Line
	–	Rattlesnake 12	12.47 kV	Line
Reeves	**115 kV**			
	–	Reeves 115/12.47kV Transformer	115 kV	Transformer
	–	Reeves 11	12.47 kV	Line
	–	Reeves 12	12.47 kV	Line
	–	Reeves 13	12.47 kV	Line
	–	Reeves 14	12.47 kV	Line
Rio Hondo	**115 kV**			
	–	Rio Hondo 115/12.47kV Transformer	115 kV	Transformer
	–	Rio Hondo 11	12.47 kV	Line
	–	Rio Hondo 12	12.47 kV	Line
	–	Rio Hondo 13	12.47 kV	Line
	–	Rio Hondo 14	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
Rita	**115 kV**			
	–	Rita 115/12.47kV Transformer	115 kV	Transformer
	–	Rita 11	12.47 kV	Line
	–	Rita 12	12.47 kV	Line
Rodeo	**115 kV**			
	–	Rodeo 115/12.47kV Transformer	115 kV	Transformer
	–	Rodeo 11	12.47 kV	Line
	–	Rodeo 12	12.47 kV	Line
	–	Rodeo 13	12.47 kV	Line
	–	Rodeo 14	12.47 kV	Line
Roy	**115 kV**			
	–	Roy 115/12.47kV Transformer	115 kV	Transformer
	–	Roy 11	12.47 kV	Line
	–	Roy 12	12.47 kV	Line
	–	Roy 13	12.47 kV	Line
Sagebrush	**115 kV**			
	–	Sagebrush 1 115/12.47kV Transformer	115 kV	Transformer
	–	Sagebrush 11	12.47 kV	Line
	–	Sagebrush 12	12.47 kV	Line
	–	Sagebrush 13	12.47 kV	Line
	–	Sagebrush 14	12.47 kV	Line
	–	Sagebrush 2 115/12.47 kV Transformer	115 kV	Transformer

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Sagebrush 21	12.47 kV	Line
	–	Sagebrush 22	12.47 kV	Line
	–	Sagebrush 23	12.47 kV	Line
	–	Sagebrush 24	12.47 kV	Line
San Antonito	**46 kV**			
	–	San Antonito 1 46/12.47 kV Transformer	46 kV	Transformer
	–	San Antonito 2 46/12.47 kV Transformer	46 kV	Transformer
	–	San Antonito 11	12.47 kV	Line
	–	San Antonito 12	12.47 kV	Line
	–	San Antonito 21	12.47 kV	Line
	–	San Antonito 22	12.47 kV	Line
San Pedro	**115 kV**			
	–	San Pedro 115/12.47 kV Transformer	115 kV	Transformer
	–	San Pedro 11	12.47 kV	Line
	–	San Pedro 12	12.47 kV	Line
	–	San Pedro 13	12.47 kV	Line
	–	San Pedro 14	12.47 kV	Line
Santo Domingo	**46 kV**			
	–	Santo Domingo 46/12.47 kV Transformer	46 kV	Transformer
Sara	**115 kV**			
	–	Sara 1 115/12.47 kV Transformer	115 kV	Transformer
	–	Sara 2 115/12.47 kV Transformer	115 kV	Transformer

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	-	Sara 3 115/12.47 kV Transformer	115 kV	Transformer
	-	Sara 4 115/12.47 kV Transformer	115 kV	Transformer
	-	Sara 5 115/12.47 kV Transformer	115 kV	Transformer
	-	Sara 6 115/12.47 kV Transformer	115 kV	Transformer
	-	Sara 7 115/12.47 kV Transformer	115 kV	Transformer
	-	Sara 8 115/12.47 kV Transformer	115 kV	Transformer
Scenic	**115 kV**			
	-	Scenic 115/12.47 kV Transformer	115 kV	Transformer
	-	Scenic 11	12.47 kV	Line
	-	Scenic 12	12.47 kV	Line
	-	Scenic 13	12.47 kV	Line
	-	Scenic 14	12.47 kV	Line
	-	Scenic 2 115/12.47 kV Transformer	115 kV	Transformer
	-	Scenic 21	12.47 kV	Line
	-	Scenic 22	12.47 kV	Line
	-	Scenic 23	12.47 kV	Line
	-	Scenic 24	12.47 kV	Line
Sewer Plant	**115 kV**			
	-	Sewer Plant 115/12.47 kV Transformer	115 kV	Transformer
	-	Sewer Plant 11	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Sewer Plant 12	12.47 kV	Line
	–	Sewer Plant 13	12.47 kV	Line
	–	Sewer Plant 14	12.47 kV	Line
Signetics	**115 kV**			
	–	Signetics 1 115/12.47 kV Transformer	115 kV	Transformer
	–	Signetics 11	12.47 kV	Line
	–	Signetics 12	12.47 kV	Line
	–	Signetics 13	12.47 kV	Line
	–	Signetics 14	12.47 kV	Line
	–	Signetics 16	12.47 kV	Line
	–	Signetics 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Signetics 21	12.47 kV	Line
	–	Signetics 22	12.47 kV	Line
	–	Signetics 23	12.47 kV	Line
	–	Signetics 24	12.47 kV	Line
	–	Signetics 26	12.47 kV	Line
Silver City	**69 kV**			
	–	Silver City North 69/12.47 kV Transformer	69 kV	Transformer
	–	Silver City South 69/12.47 kV Transformer	69 kV	Transformer
	–	Silver City 12-10	12.47 kV	Line
	–	Silver City 12-16	12.47 kV	Line
	–	Silver City 11-17	12.47 kV	Line
	–	Silver City 11-18	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
Snow Vista	**115 kV**			
	–	Snow Vista 1 115/12.47 kV Transformer	115 kV	Transformer
	–	Snow Vista 11	12.47 kV	Line
	–	Snow Vista 12	12.47 kV	Line
	–	Snow Vista 13	12.47 kV	Line
	–	Snow Vista 14	12.47 kV	Line
	–	Snow Vista 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Snow Vista 21	12.47 kV	Line
	–	Snow Vista 22	12.47 kV	Line
	–	Snow Vista 23	12.47 kV	Line
	–	Snow Vista 24	12.47 kV	Line
South Coors	**115 kV**			
	–	South Coors 115/12.47 kV Transformer	115 kV	Transformer
	–	South Coors 11	12.47 kV	Line
	–	South Coors 12	12.47 kV	Line
	–	South Coors 13	12.47 kV	Line
	–	South Coors 14	12.47 kV	Line
South Pacheco	**115 kV**			
	–	South Pacheco 1 115/12.47kV Transformer	115 kV	Transformer
	–	South Pacheco 11	12.47 kV	Line
	–	South Pacheco 12	12.47 kV	Line
	–	South Pacheco 13	12.47 kV	Line
	–	South Pacheco 14	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	South Pacheco 2 115/12.47 kV Transformer	115 kV	Transformer
	–	South Pacheco 25	12.47 kV	Line
	–	South Pacheco 26	12.47 kV	Line
	–	South Pacheco 27	12.47 kV	Line
	–	South Pacheco 28	12.47 kV	Line
St. Cecilia	**115 kV**			
	–	St. Cecilia 115/12.47 kV Transformer	115 kV	Transformer
	–	St. Cecilia 11	12.47 kV	Line
	–	St. Cecilia 12	12.47 kV	Line
	–	St. Cecilia 13	12.47 kV	Line
St. Joseph	**115 kV**			
	–	St. Joseph 115/12.47 kV Transformer	115 kV	Transformer
	–	St. Joseph 11	12.47 kV	Line
	–	St. Joseph 12	12.47 kV	Line
	–	St. Joseph 13	12.47 kV	Line
	–	St. Joseph 14	12.47 kV	Line
State Pen	**115 kV**			
	–	State Pen 1 115/12.47 kV Transformer	115 kV	Transformer
	–	State Pen 11	12.47 kV	Line
	–	State Pen 12	12.47 kV	Line
	–	State Pen 13	12.47 kV	Line
Studio	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Studio 1 115/12.47 kV Transformer	115 kV	Transformer
	–	Studio 11	12.47 kV	Line
	–	Studio 12	12.47 kV	Line
	–	Studio 13	12.47 kV	Line
	–	Studio 14	12.47 kV	Line
	–	Studio 2 115/12.47 kV Transformer	115 kV	Transformer
Thomas	**115 kV**			
	–	Thomas 115/12.47 kV Transformer	115 kV	Transformer
	–	Thomas 11	12.47 kV	Line
	–	Thomas 12	12.47 kV	Line
	–	Thomas 13	12.47 kV	Line
	–	Thomas 14	12.47 kV	Line
Tijeras	**46 kV**			
	–	Tijeras 46/12.47 kV Transformer	46 kV	Transformer
	–	Tijeras 11	12.47 kV	Line
	–	Tijeras 12	12.47 kV	Line
	–	Tijeras 13	12.47 kV	Line
Tome	**115 kV**			
	–	Tome 115/12.47 kV Transformer	115 kV	Transformer
	–	Tome 11	12.47 kV	Line
	–	Tome 12	12.47 kV	Line
	–	Tome 13	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
Tramway	**115 kV**			
	–	Tramway 115/12.47kV Transformer	115 kV	Transformer
	–	Tramway 11	12.47 kV	Line
	–	Tramway 12	12.47 kV	Line
	–	Tramway 13	12.47 kV	Line
	–	Tramway 14	12.47 kV	Line
Truman	**115 kV**			
	–	Truman 115/12.47kV Transformer	115 kV	Transformer
	–	Truman 11	12.47 kV	Line
	–	Truman 12	12.47 kV	Line
	–	Truman 13	12.47 kV	Line
	–	Truman 14	12.47 kV	Line
Tularosa	**115 kV**			
	–	Tularosa 115/12.47kV Transformer	115 kV	Transformer
	–	Tularosa 11	12.47 kV	Line
	–	Tularosa 12	12.47 kV	Line
	–	Tularosa 13	12.47 kV	Line
	–	Tularosa 14	12.47 kV	Line
Tyrone	**69 kV**			
	–	Tyrone 69/12.47 kV Transformer	69 kV	Transformer
	–	Tyrone 12-395	12.47 kV	Line
	–	Tyrone 12-517	12.47 kV	Line
Unser	**115 kV**			

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Unser 115/12.47kV Transformer	115 kV	Transformer
	–	Unser 11	12.47 kV	Line
	–	Unser 12	12.47 kV	Line
	–	Unser 13	12.47 kV	Line
	–	Unser 14	12.47 kV	Line
Valencia (2027)	**115 kV**			
	–	Valencia Transformer 115/12.47 kV	115 kV	Transformer
	–	Valencia 11	12.47 kV	Line
	–	Valencia 12	12.47 kV	Line
	–	Valencia 13	12.47 kV	Line
Van Buren	**69 kV**			
	–	Van Buren T1 69/12.47 kV Transformer	69 kV	Transformer
	–	Van Buren 11	12.47 kV	Line
	–	Van Buren 12	12.47 kV	Line
	–	Van Buren 13	12.47 kV	Line
	–	Van Buren T2 12.47/4.16kV Transformer	12.47 kV	Transformer
	–	Van Buren T4 69/4.16 kV Transformer	69 kV	Transformer
	–	Van Buren 41	4.16 kV	Line
	–	Van Buren 42	4.16 kV	Line
	–	Van Buren 43	4.16 kV	Line
Veranda	**115 kV**			
	–	Veranda 1 115/12.47kV Transformer	115 kV	Transformer

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Veranda 11	12.47 kV	Line
	–	Veranda 12	12.47 kV	Line
	–	Veranda 13	12.47 kV	Line
	–	Veranda 14	12.47 kV	Line
	–	Veranda 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Veranda 21	12.47 kV	Line
	–	Veranda 22	12.47 kV	Line
	–	Veranda 23	12.47 kV	Line
	–	Veranda 24	12.47 kV	Line
Volcano	**115 kV**			
	–	Volcano 1 115/12.47kV Transformer	115 kV	Transformer
	–	Volcano 11	12.47 kV	Line
	–	Volcano 12	12.47 kV	Line
	–	Volcano 13	12.47 kV	Line
	–	Volcano 14	12.47 kV	Line
	–	Volcano 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Volcano 21	12.47 kV	Line
	–	Volcano 22	12.47 kV	Line
	–	Volcano 23	12.47 kV	Line
	–	Volcano 24	12.47 kV	Line
Warner	**46 kV**			
	–	Warner 46/12.47 kV Transformer	46 kV	Transformer
	–	Warner 11	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
	–	Warner 12	12.47 kV	Line
	–	Warner 13	12.47 kV	Line
Wayne	**115 kV**			
	–	Wayne 1 115/12.47 kV Transformer	115 kV	Transformer
	–	Wayne 11	12.47 kV	Line
	–	Wayne 12	12.47 kV	Line
	–	Wayne 13	12.47 kV	Line
	–	Wayne 14	12.47 kV	Line
	–	Wayne 2 115/12.47 kV Transformer	115 kV	Transformer
	–	Wayne 21	12.47 kV	Line
	–	Wayne 22	12.47 kV	Line
	–	Wayne 23	12.47 kV	Line
	–	Wayne 24	12.47 kV	Line
Wesmeco	**115 kV**			
	–	Wesmeco 115/12.47 kV Transformer	115 kV	Transformer
	–	Wesmeco 11	12.47 kV	Line
	–	Wesmeco 12	12.47 kV	Line
	–	Wesmeco 13	12.47 kV	Line
	–	Wesmeco 14	12.47 kV	Line
Westpointe 40 (2027)	**115 kV**			
	–	Westpointe 40 115/12.47 kV Transformer	115 kV	Transformer
	–	Westpointe 11	12.47 kV	Line
	–	Westpointe 12	12.47 kV	Line

Station Name	Station Voltage Level(s)	Element Name (Lines, transformers)	Element Voltage (High side for transformers)	Element Type
Winrock	**115 kV**			
	–	Winrock 115/12.47 kV Transformer	115 kV	Transformer
	–	Winrock 11	12.47 kV	Line
	–	Winrock 12	12.47 kV	Line
	–	Winrock 13	12.47 kV	Line
	–	Winrock 14	12.47 kV	Line
	–	Winrock 15	12.47 kV	Line
Wyoming	**115 kV**			
	–	Wyoming 115/12.47 kV Transformer	115 kV	Transformer
	–	Wyoming 11	12.47 kV	Line
	–	Wyoming 12	12.47 kV	Line
	–	Wyoming 13	12.47 kV	Line
	–	Wyoming 14	12.47 kV	Line
Zafarano	**115 kV**			
	–	Zafarano 115/12.47 kV Transformer	115 kV	Transformer
	–	Zafarano 11	12.47 kV	Line
	–	Zafarano 12	12.47 kV	Line
	–	Zafarano 13	12.47 kV	Line
	–	Zafarano 14	12.47 kV	Line
Zamora	**46 kV**			
	–	Zamora 46/12.47 kV Transformer	46 kV	Transformer
	–	Zamora 11	12.47 kV	Line
	–	Zamora 12	12.47 kV	Line

TABLE F-3: EXISTING JOINT-OWNED TRANSMISSION LINES

Line Code	Voltage	From-To Switching Station Name	Operator
	345	Amrad - Artesia	EPE
SJ-MC 1	345	San Juan - McKinley Line 1	TEP
SJ-MC 2	345	San Juan - McKinley Line 2	TEP
	345	McKinley - Springerville Line 1	TEP
	345	McKinley - Springerville Line 2	TEP
	345	Springerville - Greenlee	TEP
GH	345	Greenlee - Hidalgo	EPE
HL	345	Hidalgo - Luna	EPE
	500	Palo Verde - Westwing Line 1	SRP
	500	Palo Verde - Westwing Line 2	SRP
	500	Hassayampa - Jojoba - Kyrene	SRP

APPENDIX G: RULES AND REGULATORY

TRANSMISSION SYSTEM

Over the last 20 years, U.S. electric transmission service has undergone major regulatory changes in the way transmission services are offered and provided and how transmission system planning is conducted.

FERC Order No. 888

The largest change stems from the 1996 implementation of the FERC Order No. 888. This order requires that a jurisdictional transmission provider, such as PNM, provide open access for transmission capacity to all eligible customers via an Open Access Transmission Tariff (OATT or Tariff). Eligible customers (e.g., Tri-State Generation and Transmission on behalf of its cooperative members, and Los Alamos County) under the Tariff can contract for Network Integration Transmission Service (NITS) to integrate their designated network resources and designated network loads on the PNM transmission system in a manner comparable to how PNM serves its own retail and wholesale customers.

The order obligates PNM to plan its transmission system to meet not only its own retail customer needs, but also its delivery obligations to NITS and long-term, firm point-to-point transmission service customers. Tariff customers can also choose to contract for firm point-to-point transmission service on a long-term basis with rollover rights that are essentially perpetual.

Energy Policy Act of 2005

The Energy Policy Act of 2005 (EPACT) legislated the implementation on a nationwide basis of mandatory transmission grid reliability rules for all owners, operators, and users of the systems. Under the EPACT, FERC was given authority to develop, monitor, and enforce all aspects of transmission grid reliability. FERC delegated to the North American Electric Reliability Corporation (NERC) the role of the national Electric Reliability Organization (ERO). The Western Electric Coordinating Council (WECC) has been delegated the role of the Regional Entity within North American Electric Reliability Corporation (NERC) that will monitor and enforce the mandatory reliability standards in the Western United States. Failing to comply with the ERO standards subjects a utility to sanctions and civil penalties of up to $1 million per day for each incident for the most substantive failures to follow FERC's grid reliability rules.

FERC Order No. 890

Issued in February 2007, after broader powers were delegated to FERC and NERC under the EPACT, this order clarified and strengthened these obligations initially established by Order No. 888 and required regional coordination by transmission companies of transmission system planning.

FERC Order No. 1000

FERC Order 1000, issued July, 21, 2011, expands the responsibilities for regional coordination in transmission system planning. Public utility transmission providers participate in a regional transmission planning process that evaluates transmission alternatives at the regional level in order to resolve the region's needs more efficiently and cost-effectively than alternatives identified by individual public utility transmission providers in their local transmission planning processes. These processes must incorporate transmission needs driven by public policy requirements and result in a regional transmission plan. PNM participation in Order 1000 is through is participation in WestConnect, which started in 2015.

FERC Order No. 881

FERC Order 881 issued on December 16, 2021, requires transmission providers to move away from seasonal and static lines ratings, which are generally conservative. In their place, the rule requires ambient adjusted ratings (AAR) , which use near-term forecast ambient air temperatures. All requirements in this rule must be implemented by July 12, 2025. PNM is in the process of implementing AAR by the effective date.

FERC Order 897

FERC Order 897 was issued on June 15, 2023 and directed transmission providers to file one-time informational reports (due October 25, 2023) that describe their policies and processes for conducting extreme weather vulnerability assessments of transmission assets and operations. The order further directed NERC to develop a new or modified reliability standard to require transmission system planning for extreme heat and cold weather conditions over wide geographical areas. NERC's process is on-going.

FERC Order 2023

FERC Order reforms procedures and agreements that electric transmission providers use to integrate new generating facilities into the existing transmission system. FERC adopted these reforms to reduce backlogs for projects seeking to connect to the transmission system, improve certainty in the interconnection processes managed by the dozens of transmission providers around the country, and ensure access to the transmission system for new technologies. PNM is in the process of drafting and filing a revised Open Access Transmission Tariff pursuant to this rule issue in July 2023.

WECC and NERC Criteria

As a member of Western Electricity Coordinating Council (WECC) and North American Electric Reliability Council (NERC), PNM complies with reliability criteria to ensure that its electric systems are safely and reliably operated.

PNM must comply with NERC operating standards, which, in part, might dictate the use of certain resources to meet the requirements. These include Control Performance Standards[1] (CPS), which measure a control area operator's ability to control system frequency and balance its load

[1] See https://www.nerc.com/pa/Stand/Pages/default.aspx (BAL-001-0_1a)

and generation at all times. They also include Disturbance Control Standards[2], which measure the control area's ability to respond to generator or load loss.

PNM must also comply with NERC standards that relate to transmission planning and operations. These include Transmission Planning Standards[3] (TPL), which measure the sufficiency of the transmission system to meet present and future needs. TPL standards state that, "The interconnected power system shall be operated at all times so that general system instability, uncontrolled separation, cascading outages or voltage collapse will not occur as a result of any single contingency or multiple contingencies of sufficiently high likelihood."

Power Supply Assessment (PSA)

NERC requires WECC to annually evaluate future resource adequacy of the western region based upon annual resource plans submitted by member utilities. The PSA is a regional and subregional determination of resource adequacy, rather than an individual utility evaluation of resource adequacy. The purpose, is to project whether enough physical resources exist, at any price, to meet load and possible reserves while considering the transmission transfer capabilities of major paths[4]. PNM, balancing area coordinator (BAC) in New Mexico, participates in the PSA study process and collects historical and future load and resource information from load-serving entities (LSEs) within New Mexico. This assessment is important because, if the PSA were to identify a resource adequacy issue in the region or subregion where PNM operates, PNM would be obligated to participate in finding a solution to the resource deficiency.

Reserve Sharing Agreements

In addition to meeting planning criteria, PNM also ensures that its resource portfolio meets operating conditions. From time to time, the operation of PNM's system may warrant additional generation or the use of certain types of reserves to maintain adequate stability.

PNM recognizes the economic and reliability benefits of participating in the Southwest Reserve Sharing Group (SRSG) for operating reserves. The operating reserve margin is measured in real time to maintain proper system frequency and balancing of loads to resources in the southwestern United States.

Southwestern U.S. utilities specify their load requirements and their resource availability on an hourly basis to SRSG. The SRSG administration examines the risk or the likelihood of a system disturbance to determine the collective reserves it needs to hold. SRSG then notifies each utility of the operational reserves they should hold, in addition to the resources each utility uses to serve its customers. Total SRSG operating reserves can be split between spinning reserves (coming from units that are operating at less than their full output) and non-spinning reserves (resources that are not operating, but can be brought online within 10 minutes). PNM's participation in SRSG is critical to minimizing the expense of PNM's reliability obligations. If PNM had to provide all of

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2 See https://www.nerc.com/pa/Stand/Pages/default.aspx (BAL-002-1 and BAL-002-WECC-1)

3 See https://www.nerc.com/pa/Stand/Pages/default.aspx (TPL-001-0.1 through TPL-004-0)

4 See https://www.nerc.com/pa/RAPA/ra/Pages/default.aspx (Reliability Assessment Guidebook)

the necessary reserves itself, the requirement would equal its single largest operating unit, which is the utility's largest risk.

PNM's SRSG allocation is partly determined by the size of the units that are included in PNM's operating portfolio. Currently, PNM's single largest potential risk is SJGS Unit 4 (392 megawatts), if it is operating, or Afton (230 megawatts), if Afton is operating and SJGS Unit 4 is not. Looking forward, and for purposes of this IRP, PNM must determine how new resource additions might change the level of reserves required for SRSG purposes or otherwise result in additional costs to meet reliability standards. Generally, PNM's planning criterion is to limit the size of new generation to that of the current largest unit.

Other System Reliability Standards

Although states have played the primary role in setting reserve margin requirements, federal agencies (Federal Energy Regulatory Commission [FERC] and NERC) have taken on increased responsibility. Numerous states (including Maryland, New Jersey, Pennsylvania, Ohio, Indiana, Wyoming, Delaware, and the District of Columbia, in addition to portions of Michigan, Wisconsin, Illinois, Kentucky, Tennessee, and Virginia) have received approval from FERC to utilize one-day-in-10-years resource planning criteria. Implementation of this criterion would result in planning for sufficient resources so that no more than 48 load hours would be lossed in a 20-year planning period. This is a more stringent criterion than PNM's existing reserve planning criteria, but could be a consideration for future planning.

New Mexico IRP Rule

This section shows the IRP Rule and where in the IRP to find content associated with its various requirements.

17.7.3.8 NMAC: Integrated Resource Plans for electric utilities. B. The IRP submitted to the commission by an electric utility shall contain the utility's New Mexico jurisdictional information as follows:

(1) description of existing resources;	**Section 3; Section 4; Appendix E**
(2) current load forecast;	**Section 3; Appendix H**
(3) load and resources table;	**Section 6.4; Appendix O**
(4) new load and facilities arising from special service agreements, economic development projects, and affiliate transactions;	**Section 1.5.6; Appendix H**
(5) identification of resource options;	**Section 8; Appendix K**
(6) statement of need;	**Section 10**
(7) determination of the resource portfolio; and	**Section 9**
(8) action plan	**Section 11**

Description of existing resources.

A. The mandate of the energy transition act to incorporate 80% renewable energy onto the grid by 2040 requires utilities operating in New Mexico to develop flexible management of grid resources. Utilities may categorize resources into the following four functional groups to reflect their role in serving this need:	
(1) load modifying resources – includes but not limited to energy efficiency, distributed generation, and time of use tariffs;	**Section 3.2; Section 3.3; Appendix E**
(2) renewable load serving resources – includes both utility scale solar and wind technologies;	**Section 4.1; Appendix E**
(3) conventional load serving resources – includes coal, nuclear, and gas technologies; and	**Section 4.1; Appendix E**
(4) grid balancing resources – includes demand response, storage technologies, natural gas combustion engines, and reciprocating engines.	**Section 3.2.2; Section 4.1; Appendix E**
B. The utility's description of its existing resources used to serve its jurisdiction load shall include:	
(1) name(s) and location(s) of utility-owned generation facilities;	**Section 4.1; Appendix E**
(2) rated capacity of utility-owned generation facilities;	**Section 4.1; Appendix E**
(3) fuel type, heat rates, annual capacity factors, and availability factors projected for utility-owned generation facilities over the planning period;	**Section 4.1; Appendix E**

(4) cost information, including capital costs, fixed and variable operating and maintenance costs, fuel costs, and purchased power costs;	**Appendix E**
(5) existing generation facilities' expected retirement dates;	**Section 4.1; Appendix E**
(6) amount of capacity obtained or to-be-obtained through existing purchased power contracts or agreements relied upon by the utility, including the fuel type, if known, and contract duration;	**Section 4.1; Appendix E**
(7) estimated in-service dates for utility-owned generation facilities for which certificates of public convenience and necessity (CCN) have been granted but which are not in-service;	**Section 4.2; Appendix E**
(8) amount of capacity and, if applicable, energy purchased via the utility's participation in regional energy markets;	**Section 2.4.1; Appendix O**
(9) description of existing demand-side resources, including:	
(a) demand-side resources deployed at the time the IRP is filed; and	**Section 3.2**
(b) demand-side resources approved by the commission, but not yet deployed at the time the IRP is filed;	**N/A**
(i) information provided concerning existing demand-side resources shall include, at a minimum, the expected remaining useful life of each demand-side resource and the energy savings and reductions in peak demand, as appropriate, made by the demand-side resource;	**Section 3.2; Appendix E**
(10) description of each existing energy storage resource, including energy storage resources approved but not yet deployed at the time the IRP is filed, and at a minimum, the expected remaining useful life of the resource, its maximum capacity, dispatch characteristics, and operating costs;	**Section 4.1.7; Section 4.2; Appendix E**
(11) reserve margin and reserve reliability requirements with which the utility must comply, and the methodology used to calculate its reserve margin;	**Section 6; Appendix M;**
(12) existing transmission capabilities:	**Section 5; Appendix F**
(a) the utility shall report its existing and under-construction transmission facilities of 115 kV and above, including associated switching stations and terminal facilities;	**Section 5; Appendix F**
(b) the utility shall specifically identify the location and extent of transfer capability limitations on its transmission network that may affect the future siting of supply-side resources; and	**Section 5**
(c) the utility shall describe all transmission planning or coordination groups to which it is a party, including state and regional transmission groups,	**Section 2.4; Section 5**

transmission companies, and coordinating councils with which the utility may be associated;	
(13) existing distribution capabilities:	
(a) the utility shall report its existing distribution facilities, under-construction distribution facilities, or distribution facilities approved but not-yet-deployed at the time the IRP is filed, including all substations, switching stations, power lines and other equipment, below 115 kV, including associated transformers and feeder lines;	**Section 5; Appendix F**
(b) the utility shall specifically identify the location and extent of capability limitations on its distribution network that may affect the future siting of distributed energy resources; and	**Section 5**
(c) the utility shall describe all distribution planning or coordination groups to which it is a party;	**Section 5**
(14) details of any planned or anticipated transmission and distribution network upgrades;	**Section 5; Appendix F**
(15) environmental impacts of existing supply-side resources:	
(a) the utility shall provide the percentage of megawatt-hours generated by each fuel used by the utility on its existing system for the latest year for which such information is available;	**Section 4.1**
(b) to the extent feasible, for each existing supply-side resource on its system, the utility shall present emission rates (expressed in pounds emitted per megawatt-hour generated) of criteria pollutants as well as carbon dioxide and mercury; and	**Section 4.1; Appendix E**
(c) to the extent feasible, for each existing supply-side resource on its system, the utility shall present the water consumption rate;	**Section 4.1; Appendix E**
(16) a summary of back-up fuel capabilities and options; and	**Section 4; Appendix E**
(17) an assessment of the critical facilities susceptible to supply-source disruptions, extreme weather events, or other failures.	**Section 5; Section 6; Appendix L; Appendix M**

Current load forecast.

A. The IRP shall contain a load forecast for each year of the planning period.	**Section 3.4; Appendix H**
B. The load forecast shall incorporate the following information and projections:	
(1) annual sales of energy, net load, and reliability reserves on a system-wide basis, by customer class, and disaggregated among commission jurisdictional sales, FERC jurisdictional sales, and sales subject to the jurisdiction of other states;	**Section 3.1; Section 6.1; Appendix H**

(2) weather normalization adjustments;	**Appendix H**
(3) assumptions for economic and demographic factors relied on in load forecasting;	**Section 3.4; Appendix H**
(4) expected capacity and energy impacts of existing and proposed demand-side resources; and	**Section 3.2; Section 8.1; Appendix H; Appendix K**
(5) typical historic day and week load patterns on a system-wide basis for each major customer class.	**Appendix H**
C. The utility shall develop an expected growth forecast, a high-growth forecast, and a low-growth forecast, or an alternative forecast that provides an assessment of uncertainty (e.g., probabilistic techniques).	**Section 3.4; Appendix H**
D. Required detail.	
(1) The utility shall explain how the utility's load forecasts account for the demand-side savings attributable to actions other than the utility-sponsored demand-side resources for each major customer class, as well as the effect of those utility-sponsored demand-side resources for each major customer class on the load forecasts.	**Section 3.4.2; Appendix H**
(2) The utility shall compare the annual forecast in its most recently filed resource plan to the annual forecast in the current resource plan.	**Section 3.4; Appendix H**
(a) In its initial IRP filing, the utility shall provide information demonstrating how well its forecasts predicted demand (during the preceding four years.)	**N/A**
(3) The utility shall explain and document the assumptions, methodologies, and any other inputs upon which it relied to develop its load forecast.	**Section 3; Appendix H**

Load and resources table.

A. The IRP shall contain a table of the utility's existing loads and resources at the time of filing.	**Section 6.4; Appendix O**
B. The load and resources table, to the extent practical, shall contain the appropriate components from the load forecast.	**Appendix O**
C. Resources shall include:	
(1) utility-owned generation;	**Appendix O**
(2) energy storage resources;	**Appendix O**
(3) existing and future contracted-for purchased power, including qualifying facility purchases;	**Appendix O**
(4) purchases through net metering programs, as appropriate;	**Appendix O**
(5) demand-side resources, as appropriate; and	**Appendix O**

(6) other resources relied upon by the utility, such as pooling, wheeling, or coordination agreements effective at the time the IRP is filed.	**Appendix O**

Identification of resource options.

A. The utility shall identify additional resource options in its IRP that it evaluated for selection as part of the utility's portfolio.	**Section 8; Appendix K**
B. In identifying additional resource options, the utility should consider all supply-side, energy storage, and demand-side resources.	**Section 8; Appendix K**
C. The utility shall describe the assumptions and methodologies used in evaluating its resource options, including, as applicable:	
(1) life expectancy;	**Section 8; Appendix K**
(2) whether the resource is replacing or adding capacity or energy;	**Section 1.5.5; Section 4.1.3; Section 8; Section 9; Appendix K; Appendix O**
(3) dispatchability;	**Section 8; Appendix K**
(4) lead-time requirements;	**Section 8; Appendix P**
(5) flexibility, including black start capability;	**Appendix K**
(6) load-modifying or grid-balancing capabilities;	**Section 8.1; Section 8.3**
(7) efficiency; and	**Section 8; Appendix K**
(8) ability to most effectively provide reasonable and consistent progress toward satisfaction of the renewable portfolio standard.	**Section 2.2; Section 8.2**
D. For supply-side resource options, the utility shall identify the assumptions actually used for capital costs, fixed and variable operating and maintenance costs, fuel costs forecast by year, and purchased power demand and energy charges forecast by year, fuel type, heat rates, annual capacity factors, availability factors and, emission rates (expressed in pounds emitted per kilowatt-hour generated) of criteria pollutants as well as carbon dioxide and mercury.	**Appendix I; Appendix J; Appendix K**
E. The utility shall describe its existing rates and tariffs that incorporate load management or load modifying concepts. The utility shall also describe how changes in rate design might assist in meeting, delaying or avoiding the need for new capacity.	**Section 3.2; Section 3.3; Appendix H**
F. In identifying resource options, the utility shall include a description of the projected emissions of carbon dioxide for any resources proposed to be owned by the utility and for any new generic resources included in the utility's modeling for its resource plan;	**Section 9.2.5; Appendix K; Appendix N**

17.7.3.10 Statement of need.

A. The statement of need is a description and explanation of the amount and the types of new resources, including the technical characteristics of any proposed new resources, to be procured, expressed in terms of energy or capacity, necessary to reliably meet an identified level of electricity demand in the planning horizon and to effect state policies.	**Section 10**
B. The statement of need shall not solely be based on projections of peak load. The need may be attributed to, but not limited by, incremental load growth, renewable energy customer programs, or replacement of existing resources, and may be defined in terms of meeting net capacity, providing reliability reserves, securing flexible resources, securing demand-side resources, securing renewable energy, expanding or modifying transmission or distribution grids, or securing energy storage as required to comply with resource requirements established by statute or commission decisions.	**Section 10**

Determination of the resource portfolio.

A. To identify the most cost-effective resource portfolio, utilities shall evaluate all supply-side resources, energy storage, and demand-side resource options on a consistent and comparable basis, taking into consideration risk and uncertainty, including but not limited to financial, competitive, operational, fuel supply, price volatility, downstream impacts on transmission and distribution investments, extreme-weather events, and anticipated environmental regulation costs.	**Section 7; Section 9; Appendix N**
B. The utility shall evaluate the cost of each resource through its projected life with a life-cycle or similar analysis.	**Section 8; Appendix E; Appendix K**
C. The utility shall consider and describe ways to mitigate ratepayer risk.	**Section 7.2; Section 9**
D. Each electric utility shall provide a summary of how the following factors were considered in, or affected, the development of resource portfolios:	
(1) load management or modification and energy efficiency requirements;	**Section 3.2; Section 8.1; Section 9; Appendix E; Appendix K**
(2) renewable energy portfolio requirements;	**Section 2.2; Section 8.2; Section 9**
(3) existing and anticipated environmental laws and regulations, and, if determined by the commission, the standardized cost of carbon emissions;	**Section 2.2; Section 8.8.3; Section 9.2.5; Appendix I**
(4) fuel diversity;	**Section 8; Section 9; Appendix I**

(5) susceptibility to fuel interdependencies;	**Section 4; Section 8.8; Section 9; Appendix I; Appendix J**
(6) transmission or distribution constraints; and	**Section 5; Section 8.5; Section 9.3; Appendix F**
(7) system reliability and planning reserve margin requirements.	**Section 6; Section 6.4; Section 7.3.4; Section 10; Appendix L; Appendix M**
E. Alternative portfolios. In addition to the detailed description of what the utility determines to be the most cost-effective resource portfolio, the utility shall develop alternative portfolios by altering risk assumptions and other parameters developed by the utility.	**Section 7; Section 9; Appendix N; Appendix O**

17.7.3.11 NMAC: Action plan. The utility's action plan shall:

(1) detail the specific actions the utility shall take to implement the IRP spanning a three year period following the filing of the utility's IRP;	**Section 11**
(2) detail the specific actions the utility shall take to develop any resource solicitations or contracting activities to fulfill the statement of need as accepted by the commission; and	**Section 11; Appendix P**
(3) include a status report of the specific actions contained in the previous action plan.	**Section 1.4.1**

17.7.3.9 NMAC: Facilitated stakeholder process; IRP process. A. At least six months prior to the filing of its IRP, the utility shall notify the commission, members of the public, the New Mexico attorney general, and all parties to its most recent base rate case and most recent IRP case of its intent to file an IRP.

(1) The utility shall provide commission utility division staff and stakeholders who have signed a confidentiality agreement reasonable access to the same modeling software used by the utility on equal footing as the utility, and shall perform a reasonable number of modeling runs per staff or a stakeholder, if requested by staff or a stakeholder, in accordance with commission precedent, and the utility shall share all modeling information.	**Section 1.2; Appendix C; Appendix D**

APPENDIX H: LOAD FORECAST DETAILS

This appendix provides details surrounding the assumptions and development of our load forecast. Tables H-1 and H-2 show the peak demand forecast and annual energy demand across the CTP, LEG, HEG, and XEG scenarios considered in the IRP. Figures H-1 and H-2 component of annual peak demand forecast and component of annual energy demand forecast under CTP. The subsequent sections provide details behind the load forecasting approach (including data required by the IRP Rule).

TABLE H-1. ANNUAL PEAK DEMAND FORECAST UNDER VARIOUS FUTURES (MW)

Peak Demand – prior EE adjustment (MW)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Current Trends & Policy	2,250	2,448	2,641	3,082	3,124	3,136	3,152	3,188	3,218	3,238	3,254	3,278	3,312	3,360	3,391	3,420	3,461	3,500	3,562	3,604
Low Economic Growth	2,026	2,078	2,130	2,523	2,565	2,616	2,624	2,640	2,648	2,652	2,653	2,662	2,678	2,700	2,707	2,718	2,739	2,758	2,794	2,816
High Economic Growth	2,414	2,639	2,844	3,331	3,405	3,447	3,491	3,558	3,619	3,671	3,719	3,778	3,850	3,932	3,994	4,056	4,135	4,212	4,318	4,398
Extreme Economic Development	2,414	2,639	2,879	3,422	4,076	4,585	4,764	4,881	4,994	5,099	5,199	5,312	5,439	5,578	5,694	5,807	5,937	6,066	6,233	6,367

TABLE H-2. ANNUAL ENERGY DEMAND UNDER VARIOUS FUTURES (GWH)

Annual Energy - prior EE adjustment (GWh)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Current Trends & Policy	11,379	12,910	14,176	17,704	18,120	18,187	18,289	18,345	18,441	18,534	18,646	18,721	18,818	18,940	19,088	19,202	19,343	19,485	19,667	19,778
Low Economic Growth	10,267	10,718	11,038	14,039	14,606	14,992	15,073	15,061	15,069	15,062	15,059	15,022	15,019	15,027	15,061	15,052	15,074	15,098	15,153	15,158
High Economic Growth	11,869	13,597	14,921	18,772	19,377	19,596	19,837	20,033	20,278	20,523	20,797	21,033	21,303	21,602	21,939	22,234	22,561	22,891	23,266	23,556
Extreme Economic Development	11,869	13,597	15,381	19,828	25,248	29,800	31,272	31,912	32,616	33,328	34,108	34,763	35,512	36,280	37,139	37,850	38,645	39,441	40,332	41,044

FIGURE H-1. ANNUAL PEAK DEMAND FORECAST COMPONENT (CTP)

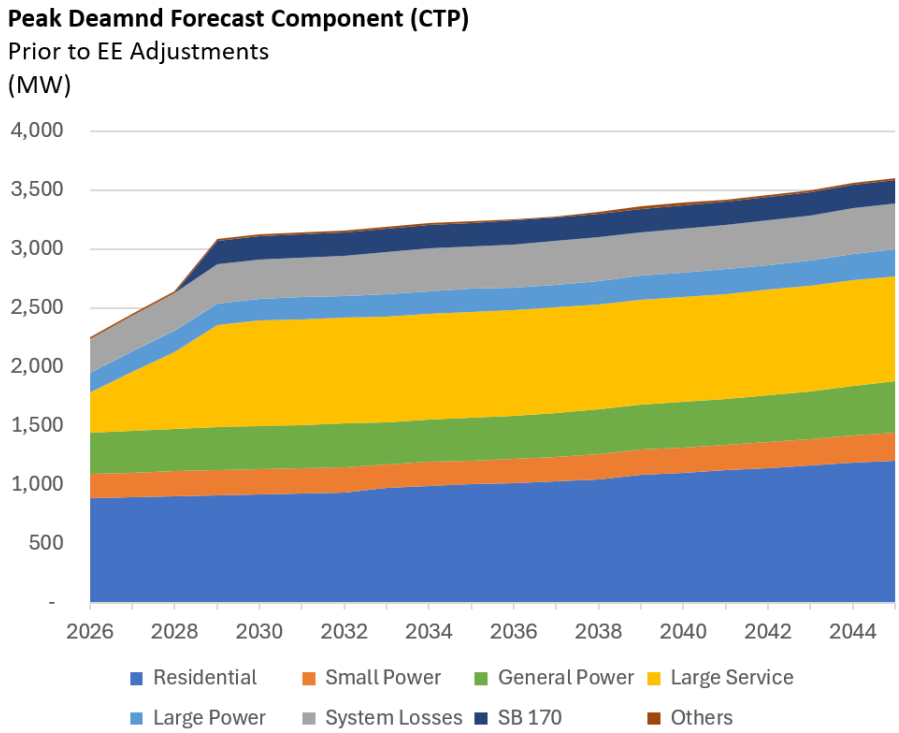
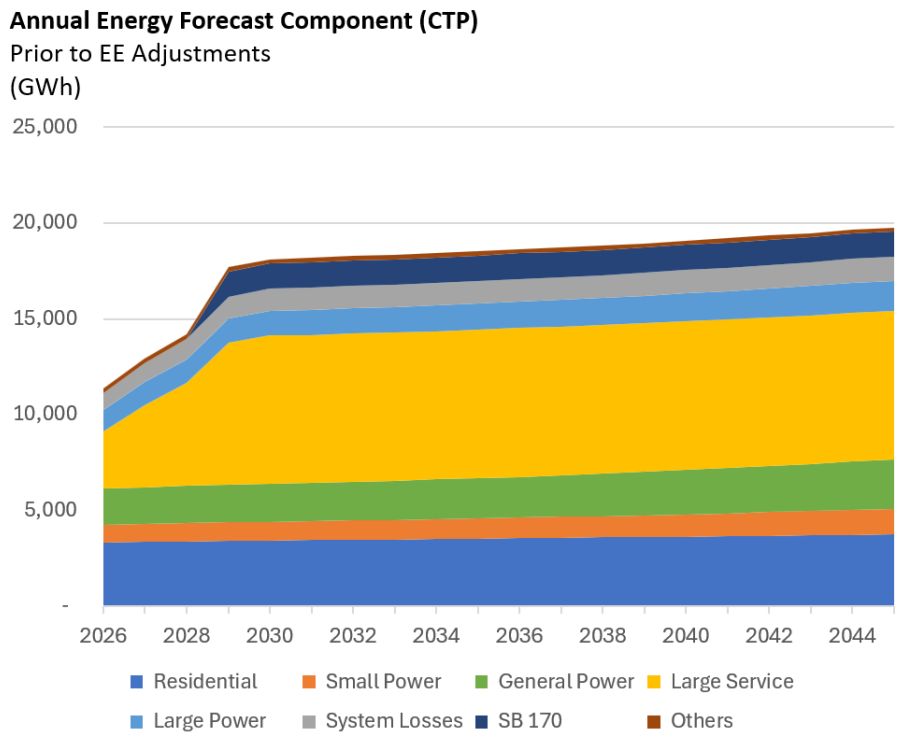


FIGURE H-2. ANNUAL ENERGY DEMAND FORECAST COMPONENT (CTP)



Load forecast Methodology

This document presents the load forecasting methodology, data inputs, modeling framework, and scenario results developed for PNM's Integrated Resource Plan (IRP).

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1. Executive Summary

This document presents the load forecasting methodology, data inputs, modeling framework, and scenario results developed for PNM's Integrated Resource Plan (IRP). The forecast covers the planning horizon from 2026 through 2045 and provides the foundation for resource planning decisions.

The forecast is developed using a bottom-up methodology that combines econometric modeling, end-use analysis, and hourly load simulation. Key components include:

- Economic growth projections from Woods and Poole for PNM service territory counties
- Weather normalization using a 10-year normal period (2015-2024) with extreme weather scenarios
- Behind-the-meter (BTM) solar photovoltaic capacity and generation forecasts
- Electric vehicle (EV) adoption forecasts based on EPRI studies for light duty, fleet, and medium/heavy duty vehicles
- Building electrification impacts including heat pump adoption and new construction requirements
- Residential time-of-use (TOD) rate impacts on load shapes
- Statistically Adjusted End-Use (SAE) models for residential and commercial customer classes
- Hourly load models calibrated to load research data for peak demand forecasting

The forecast is presented through multiple scenarios that capture a range of outcomes from strong growth to weak growth conditions. Complex scenarios combine multiple input variables to represent plausible planning futures for resource adequacy assessment.

2. Economic Data and Forecasts

Economic data are collected on a county level for New Mexico. These county level forecasts are analyzed based on the counties PNM serves. One of the main drivers for the forecast is economic variable. The following paragraph describes how PNM analyzed economic variable forecasts.

2.1 Data Sources and Coverage

Economic data and forecasts are provided by Woods and Poole, a nationally recognized provider of regional economic projections. The dataset includes:

- Annual historical data from 1950 to 2024
- Annual forecasts extending to 2050
- State and county level detail

Data is compiled for counties within PNM's service territory, organized into two geographic regions:

Table 2.1: PNM Service Territory Counties

Region	County	Primary Economic Characteristics
North	Bernalillo	Major metro area (Albuquerque); dominant share of population and employment
North	San Miguel	Rural; smaller population base
North	Sandoval	Suburban growth corridor; Rio Rancho area
North	Santa Fe	State capital; government employment, tourism
North	Union	Rural; agriculture-based economy
North	Valencia	Suburban/rural; growing residential base
South	Grant	Mining and natural resources
South	Hidalgo	Rural; border region
South	Luna	Border community (Deming); agriculture

Region	County	Primary Economic Characteristics
South	Otero	Military (Holloman AFB); tourism (Alamogordo)

Annual data are converted to monthly frequency using centered moving averages to provide the temporal resolution required for monthly energy forecasting models.

2.2 Economic Scenarios

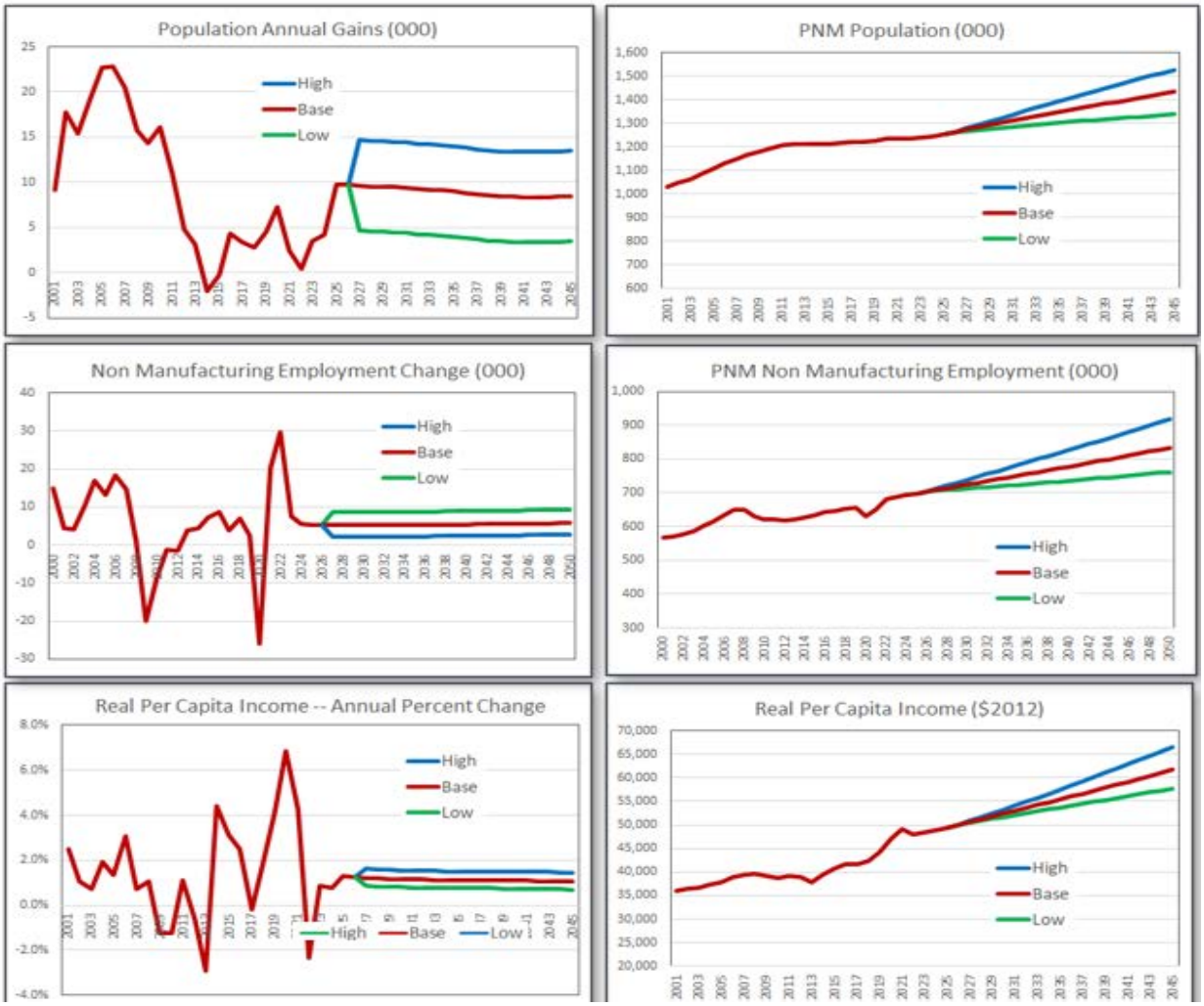
Three economic growth scenarios are developed to capture the range of plausible economic outcomes over the forecast horizon. All statistics represent averages over the 2026 to 2045 forecast period.

Table 2.2: Economic Scenario Summary (2026-2045 Averages)

Economic Indicator	High Case	Base Case	Low Case
Population Annual Gains	13,700	8,900	4,200
Non-Mfg. Employment Annual Gains	8,700	5,300	2,500
Real Per Capita Income Growth	1.5%	1.1%	0.8%

Figure 2.1 shows economic scenarios for population annual growth in different scenarios.

Figure 2.1: Economic Scenario Comparison



2.3 Comparison to Prior IRP

The primary drivers of residential and commercial customer growth are population and nonmanufacturing employment. Compared to the prior IRP:

- Population forecasts are slightly weaker. The 2045 population is approximately 27,000 lower (-1.9%) than the prior IRP forecast, though annual gains beyond 2025 are approximately the same.
- Employment forecasts are largely consistent with the prior IRP. Employment in 2050 is approximately 2,000 higher (-0.3%) than previously projected.

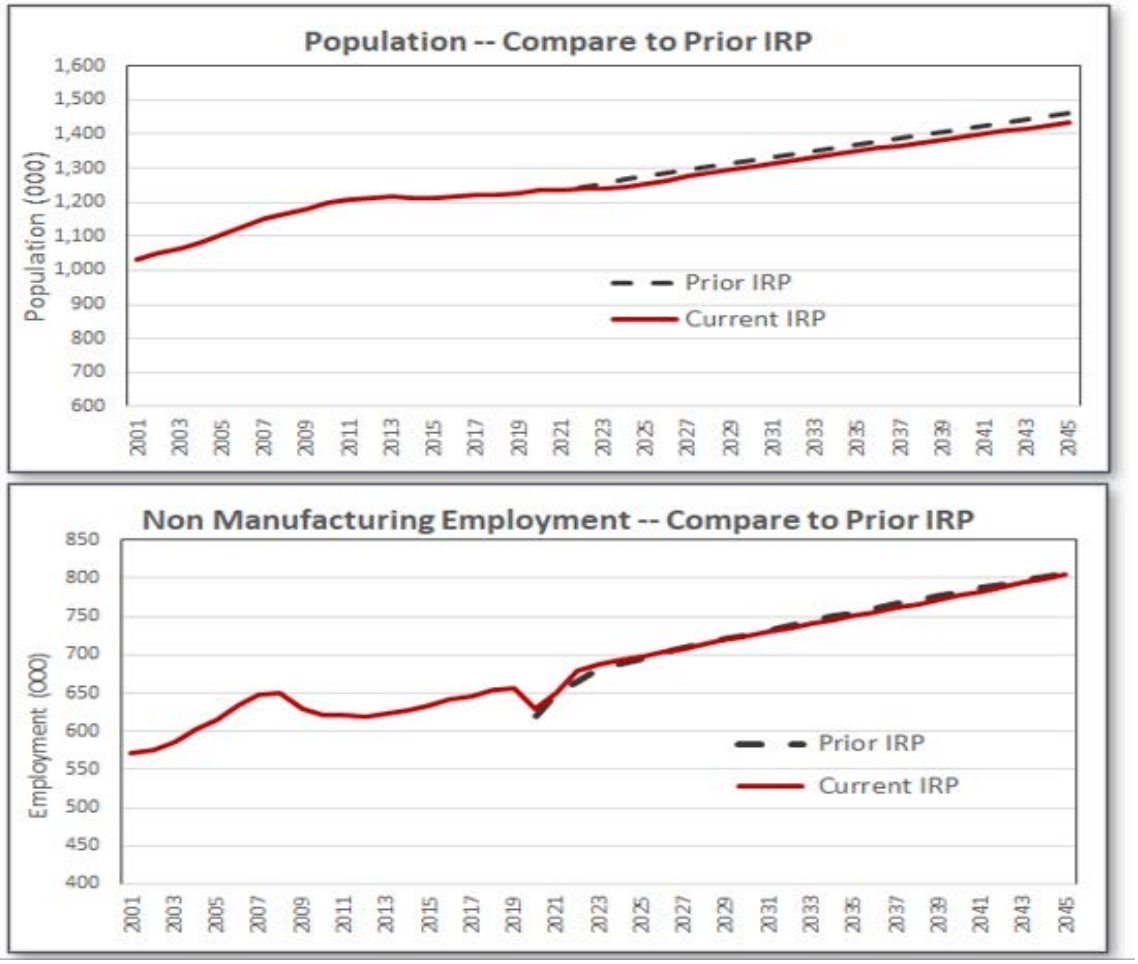
Table 2.3: Economic Forecast Comparison to Prior IRP

Metric	Current IRP	Prior IRP	Difference	% Change
Population in 2045	~1,390,000	~1,417,000	-27,000	-1.9%
Employment in 2050	Comparable	Comparable	+2,000	+0.3%
Post-2025 Annual Pop. Gains	~8,900	~8,900	Minimal	~0%

Figure 2.2 shows population and non-manufacturing employment growth compared to prior Integrated Resource Planning (IRP). Population growth has declined from the previous IRP which impacts this forecast slightly down. On the other hand, non-manufacturing employment is very similar to the last IRP. It did not change much from what was in the last IRP.

Population growth is very significant for the residential class forecast for customers in future. Non-manufacturing employment plays a role in residential customers. More employment in non-manufacturing means more residential customers in the future. Both variables are very stable and did not change much from last IRP.

Figure 2.2: Economic Forecast — Current vs. Prior IRP



3. Weather Data, Normal and Extreme Weather

Weather data are collected through AccuWeather services on an hourly basis. PNM composed weather data for four weather stations. The following describes the process in detail.

3.1 Weather Data Sources

Hourly weather data are obtained from AccuWeather for four weather stations across PNM's service territory. Table 3.1 shows the weather stations and their locations.

Table 3.1: Weather Station Details

Station Name	ID	Region	Latitude	Longitude	Elevation (ft)
Albuquerque International Sunport	KABQ	North	35.04°N	106.62°W	5,355
Santa Fe Municipal Airport	KSAF	North	35.62°N	106.09°W	6,348
Deming Municipal Airport	KDMN	South	32.26°N	107.72°W	4,314
Alamogordo-White Sands Regional	KALM	South	32.84°N	105.99°W	4,197

Key weather variables collected include:

- Temperature: Used to compute heating degree days (HDD) and cooling degree days (CDD) at multiple base temperatures
- Global Horizontal Irradiation (GHI): Used for solar generation modeling

3.2 Station Weighting

Station weights for composite weather variables are based on monthly billed sales by geographic area. Figure 3.1 shows the map of different weather stations and their location.

Figure 3.1: Weather stations with locations

Table 3.2: Weather stations with heating, cooling degree days with solar GHI

Station	Heating Degrees	Cooling Degrees	Solar GHI
KABQ	75.0%	77.8%	76.3%
KALM	3.0%	3.2%	3.1%
KDMN	9.0%	8.4%	8.9%
KSAF	13.0%	10.5%	11.7%

Hourly weather data from AccuWeather

- Temperature – Used to compute Degree Days
- Global horizontal irradiation (GHI) – Used for solar generation

4 Stations

- North: Albuquerque (KABQ), Santa Fe (KSAF)
- South: Deming (KDMN), Alamogordo (KALM)

Station weights are created based on billed sales on a seasonal basis for winter and summer. Table 3.3 shows the methodology used for creating the weights that are presented above in table 3.2.

Table 3.3: Station Weighting Methodology

Weight Type	Basis	Season/Period	Application
Heating Degree Day Weights	Billed sales by station area	Winter season	Composite HDD for energy models
Cooling Degree Day Weights	Billed sales by station area	Summer season	Composite CDD for energy models
Solar GHI Weights	Billed sales by station area	Annual	Composite GHI for PV generation models

3.3 Normal and Extreme Weather

Normal weather is defined using a 10-year averaging period from 2015 to 2024. Extreme weather represents a 1-in-20-year event.

Figure 3.2: Normal vs. Extreme Weather Temperatures

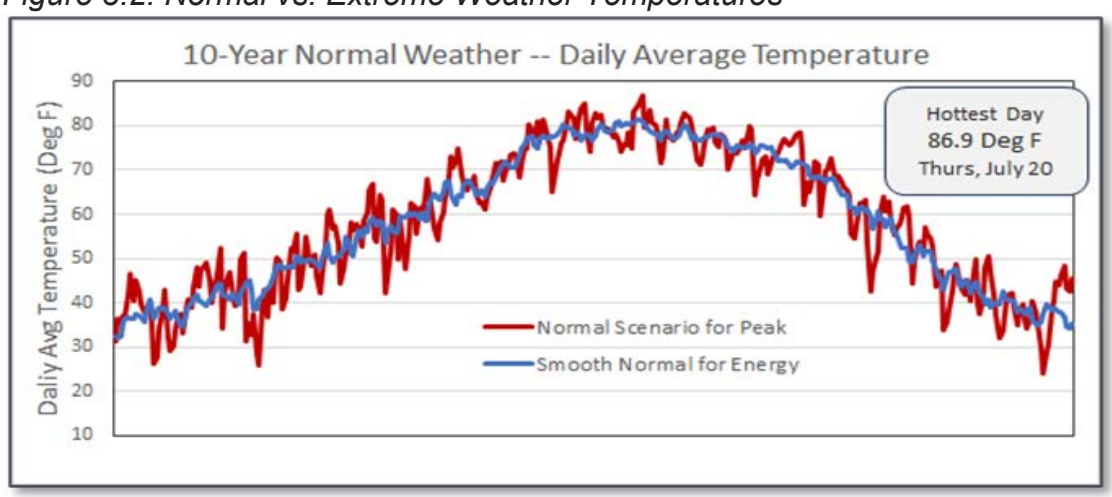


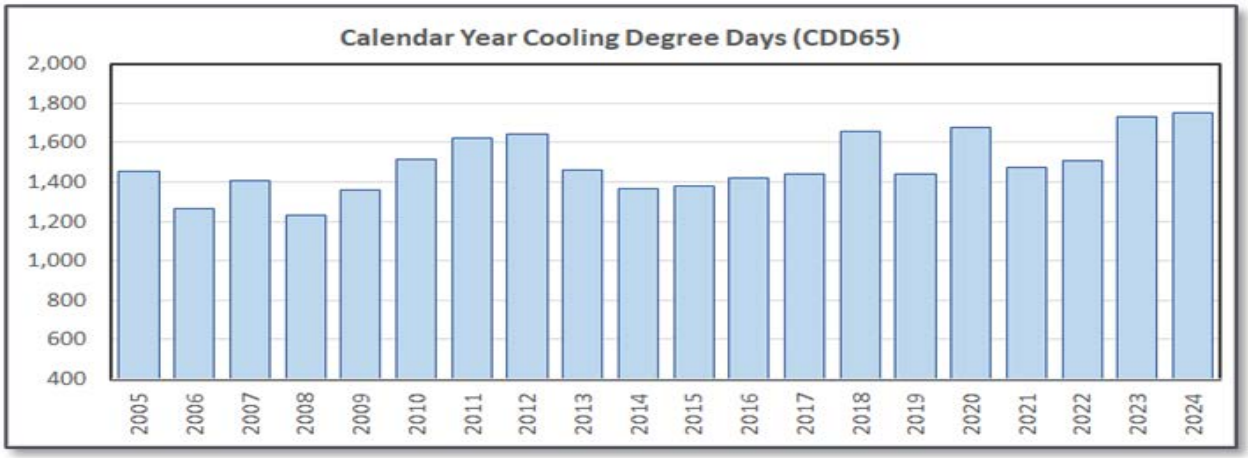
Table 3.4 shows the definition for weather metric with different values and the normal weather period that are used in the forecast.

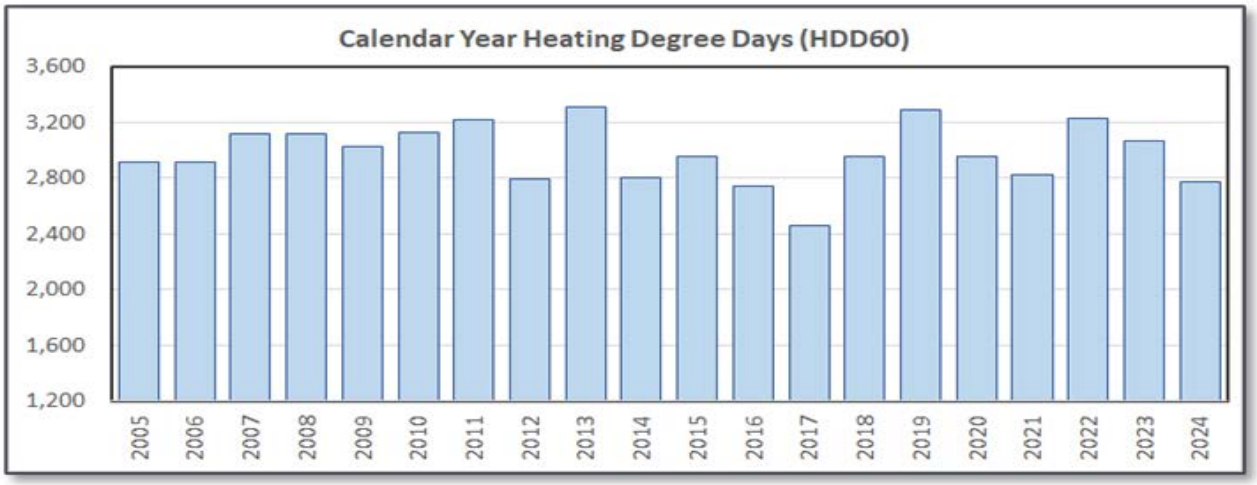
Table 3.4: Normal Weather Statistics

Weather Metric	Normal Value	Extreme Value	Period
Typical Hottest Day Temperature	86.9°F	89.4°F (Extreme Hot)	10-year normal (2015-2024)
Typical Coldest Day Temperature	21.8°F	3.5°F (Extreme Cold)	10-year normal (2015-2024)
Annual CDD (10-year avg)	1,549	1,751 (2024)	2015-2024
Annual HDD (10-year avg)	2,953	3,289 (2019)	2015-2024

Figure 3.3 below shows calendar year cooling degree days and calendar year heating degree days for different years from 2005 to 2024. It is noticeable how weather fluctuates year by year.

Figure 3.3: Degree Day Statistics — CDD and HDD





Degree Day Base Temperatures are defined in the table below. This degree day base temperature is used in the forecast to assess the different weather responses for the load.

Table 3.5: Degree Day Base Temperatures

Degree Day Type	Base Temperatures Used
Cooling Degree Days (CDD)	55°F, 60°F, 65°F, 70°F, 75°F
Heating Degree Days (HDD)	45°F, 50°F, 55°F, 60°F

4. Weather Response Modeling

4.1 Load Research Data

Load research data provide hourly and daily energy use estimates for a statistical sample of customers by rate class. These data form the foundation for understanding the relationship between weather and electricity consumption.

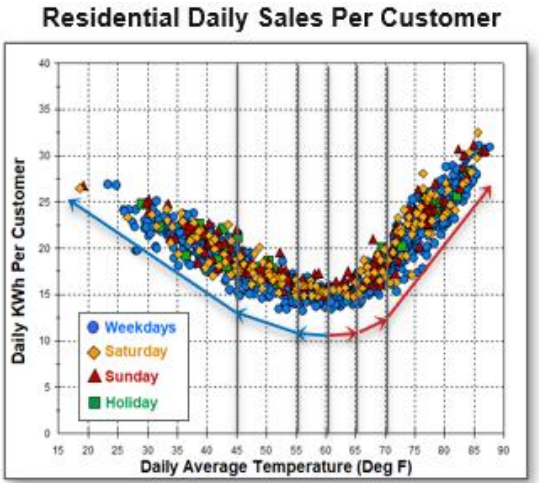
4.2 Weather Response Characteristics

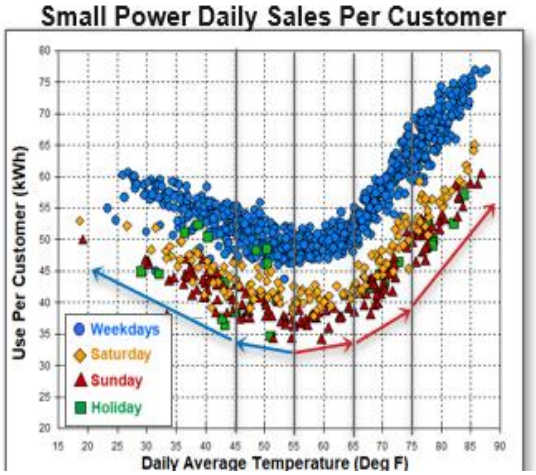
Analysis of daily sales per customer reveals several important characteristics: following page describes in bullet points the weather response with Figure 4.1.

- Daily energy use shows a strong response to daily weather conditions

- The response of load to weather is nonlinear, with increasing sensitivity at temperature extremes
- Weather response patterns differ across customer classes (Residential, Small Power, General Power)

Figure 4.1: Residential and Small Power daily sales for different days





4.3 Degree Day Weighting

Load research data are used to calculate optimal heating degree day (HD) and cooling degree day (CD) weights through daily regression models:

- The dependent variable (Y) is daily sales per customer
- Independent variables (X) are daily CD and HD values at multiple base temperatures
- Regression results determine the optimal weights for low, medium, and high-powered degree day variables
- Separate weight sets are computed for Residential, Small Power, and General Power customer classes

Table 4.1: HDD and CDD weights for different classes

Residential Weights

Spline	Wgt
HD60	0.285
HD55	0.422
HD45	0.293
CD60	0.188
CD65	0.286
CD70	0.526

Small Power Weights

Spline	Wgt
HD55	0.572
HD45	0.428
CD55	0.237
CD65	0.629
CD75	0.134

General Power Weights

Spline	Wgt
HD55	0.307
HD45	0.693
CD55	0.448
CD65	0.552

5. Behind the Meter Solar Data and Forecasts

The detailed behind-the-meter solar data and forecast can be found in the study in Appendix H2: BTM Solar Forecasting Methodology.

6. Electric Vehicle Forecast

Electric vehicle (EV) saturation is growing in PNM service territory based on the history. PNM used EPRI EV forecast to build energy use for charging electric vehicles. Scenarios are created using EPRI data.

6.1 Adoption Forecast Methodology

Electric vehicle adoption forecasts are based on the EPRI study and cover three vehicle segments:

- Light duty vehicles: Charging at home and away from home
- Fleet vehicles: Commercial charging
- Medium/heavy duty vehicles: Commercial charging

6.2 Light Duty Vehicle Forecast

The light duty vehicle forecast uses a 50/50 weighting of EPRI Low and Medium adoption scenarios. Figure 6.1 shows Light Duty Vehicle (LDV) and Medium/Heavy Vehicle (MDV) forecasts with high, low scenarios. Table 6.1 lays out numbers of LDV and MDV.

Figure 6.1: Electric Vehicle Adoption Scenarios

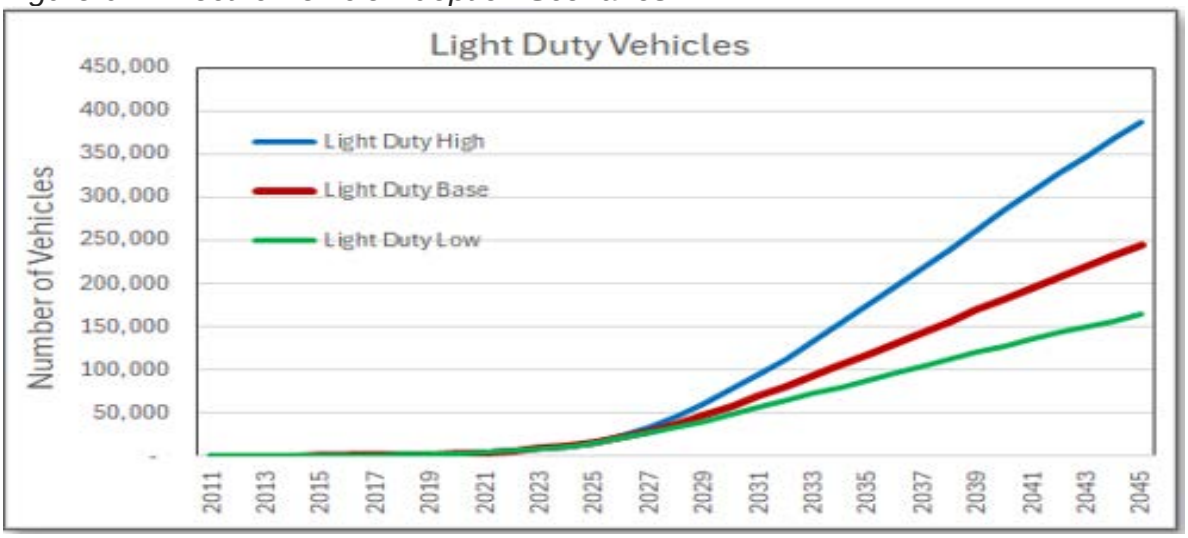


Figure 6.2: Fleet and Medium/Heavy duty vehicle forecast

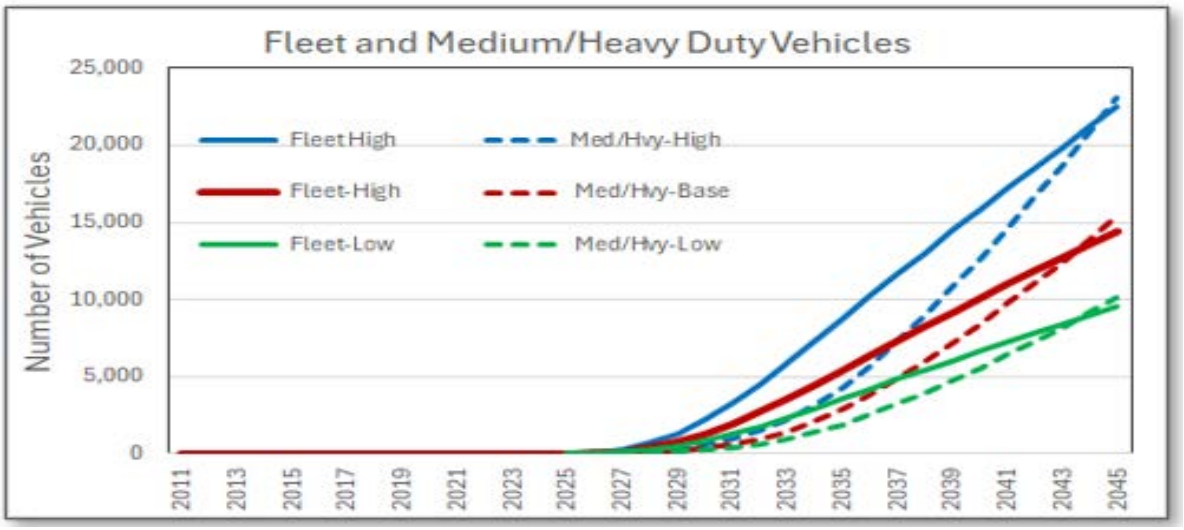


Table 6.1: EV Adoption Scenarios — Light Duty Vehicles

Metric	High EV	Base EV	Low EV
New Vehicle Sales by 2045 (annual)	18,900	12,000	6,900
Total EV Count in 2045	387,000	245,000	164,000
EPRI Scenario Weighting	50/50 Low/Medium + Uplift	50/50 Low/Medium	50/50 Low/Medium - Reduction

Figure 6.2 details Fleet and Medium/Heavy duty vehicle forecast, adjustments with comparing what was done in the previous IRP forecasts. This is helpful to understand as electrification in PNM system is changing and is dynamic in nature.

6.3 Fleet and Medium/Heavy Duty Vehicle Forecast

Table 6.2 describes weighing and adjustments in the Medium/Heavy duty vehicles in the forecast.

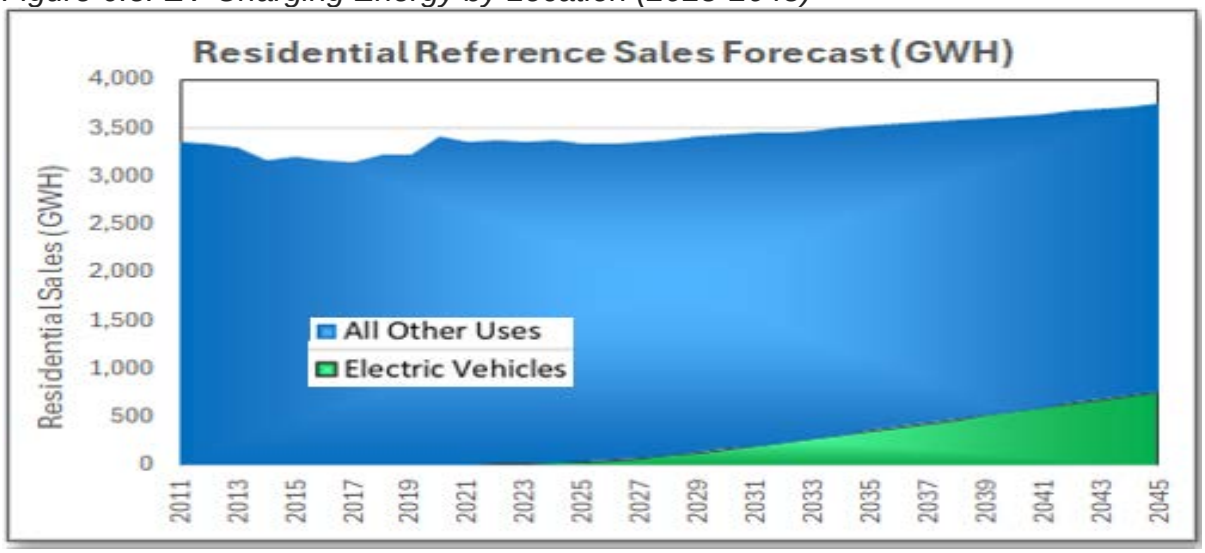
Table 6.2: Fleet and Medium/Heavy Duty Vehicle Forecast

Vehicle Segment	EPRI Weighting	Additional Adjustment	Acceleration Year	Prior IRP
Fleet (Light Commercial)	50/50 Low/Medium	Reduced by 50%	2030	Not modeled
Medium Duty	50/50 Low/Medium	Reduced by 50%	2035	Not modeled
Heavy Duty	50/50 Low/Medium	Reduced by 50%	2035	Not modeled

6.4 EV Charging Energy

Figure 6.3 depicts EV charging energy based on location based on the uses and EV charging.

Figure 6.3: EV Charging Energy by Location (2025-2045)



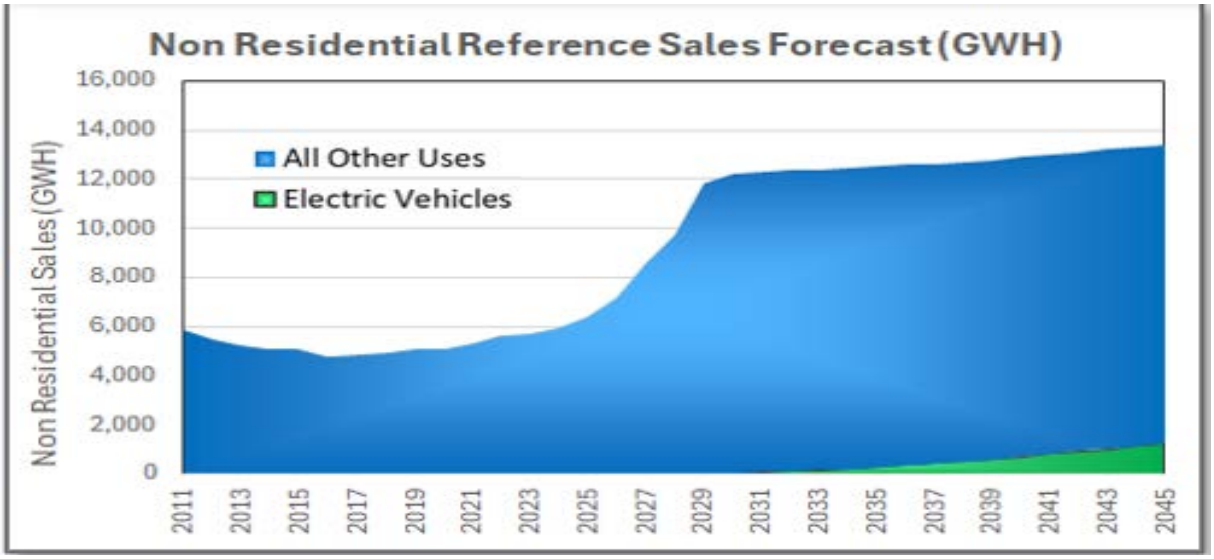


Table 6.3 elaborates on the EV segments and charging locations and key metrics in the forecast horizon.

Table 6.3: EV Charging Energy by Segment

Segment	Charging Location	Share of LDV Charging	Key Metric (2025-2045)
Residential (LDV at home)	Home	80%	Sales gain: 419 GWh; EV energy: 722 GWh
Nonresidential (LDV away)	Workplace/Public	20%	Growing; part of nonres total
Fleet	Commercial	100% nonresidential	Accelerates from 2030
Medium/Heavy Duty	Commercial	100% nonresidential	Accelerates from 2035

Segment	Charging Location	Share of LDV Charging	Key Metric (2025-2045)
Total Nonres by 2045	All commercial	~60% of total	Driven by fleet and M/HD

6.5 EV Charging Profiles

Table 6.4 shows the vehicle types and profiles used for forecasting for EVs.

Table 6.4: EV Charging Profile Sources

Vehicle Type	Location	Profile Source	Strategies Modeled
Light Duty — Home	Residential	NREL EV-Pro	Immediate; Start at time; Charge by time
Light Duty — Away	Workplace/Public	Idaho National Labs	Observed patterns
Fleet	Commercial	California study	By vehicle type
Med/Heavy Duty	Commercial	California study	Bus, refuse, drayage, tractor-trailer, etc.

7. Other Scenario Inputs

PNM considers electrification an essential part of load forecasting. Building electrification was analyzed to describe the impact on energy and demand forecast in this section.

7.1 Building Electrification

The building electrification scenario models the transition from natural gas and propane to electric alternatives. Table 7.1 depicts the construction methodology and 7.1.1 shows existing home conversion from gas to electric.

Table 7.1: New Construction Electrification Assumptions (Starting 2030)

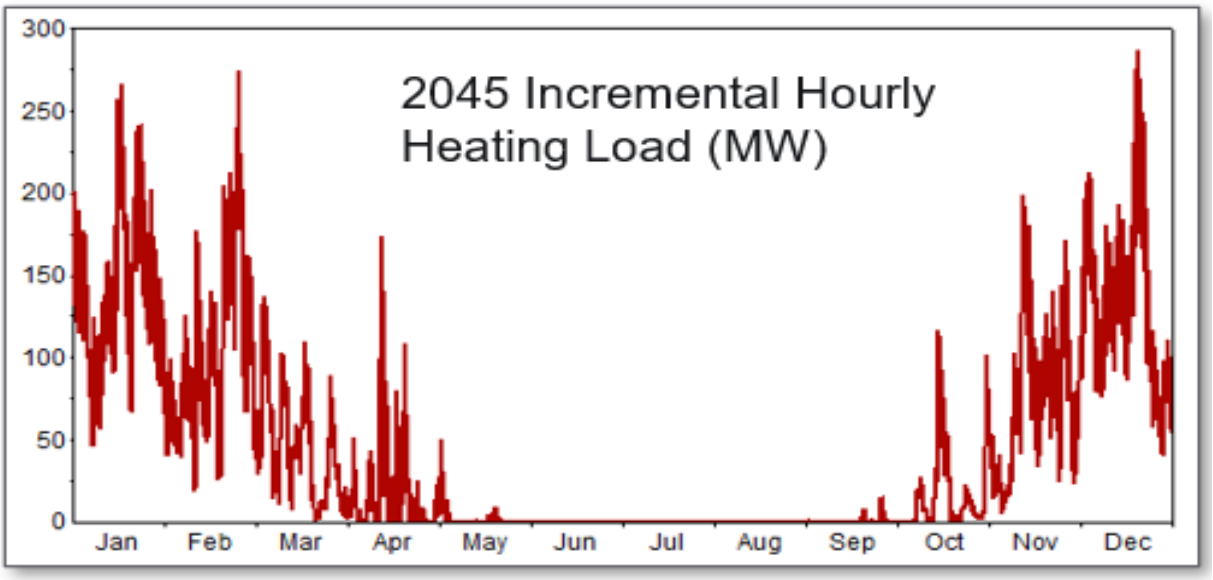
Parameter	**Current Baseline**	**Electrification Scenario**
Natural Gas/Propane Permitted	Yes	No (banned in new construction from 2030)
Electric Heat Share	15%	75%
Heat Pump Share of Increase	—	80%
Evaporative Cooling	Prevalent	Reduced; replaced by central AC
Electric Water/Cooking/Dryer	Baseline	Increased

Figure 7.1 shows the incremental heating load because of electrification in the system-based assumption described in Table 7.1. Winter months are very noticeable because it is adding heating load to the system.

Table 7.1.1: Existing Home Conversion Assumptions

Parameter	Value
Annual Conversion Rate	~2% of existing homes (~7,000 homes/year)
Evaporative Cooling Displacement	30% of converted homes
Incremental Cooling UEC	~1,500 kWh/year
Heat Pump Heating UEC	~2,500 kWh/year (average)

Figure 7.1: Residential Electric Heating Share Trajectory



7.2 Residential Time-of-Use Rates

The TOU/TOD scenario introduces residential time-of-use rate structures beginning with pilots through 2029, followed by a full opt-out program in 2030. In this scenario, it is assumed 80% will opt in and 20% will opt out. Based on these parameters, Table 7.2 shows impact on the system in the morning, evening, price ratio and on peak reduction. Table 7.2.1 shows the participation assumed based on impact study basis from ACEEE

50 pricing basis. Figure 7.2 and Table 7.2.2 show residential hourly load with or without TOU/TOD.

Table 7.2: TOU/TOD Rate Structure

Parameter	Summer	Winter
On-Peak Period (Evening)	5:00-8:00 PM	5:00-8:00 PM
On-Peak Period (Morning)	None	5:00-8:00 AM
Price Ratio (On/Off Peak)	4.0	2.5
On-Peak Reduction (Non-EV)	10.5%	Proportional

Table 7.2.1: TOU/TOD Participation Assumptions

Customer Segment	Assumption
Non-EV Homes Opt-Out Rate	20%
EV Owners on WHEV Rate	80%
WHEV Off-Peak Window	10:00 PM - 5:00 AM
Impact Study Basis	ACEEE summary of 50 pricing pilots

Figure 7.2: System Load Profile — TOU/TOD Impact on Peak Demand

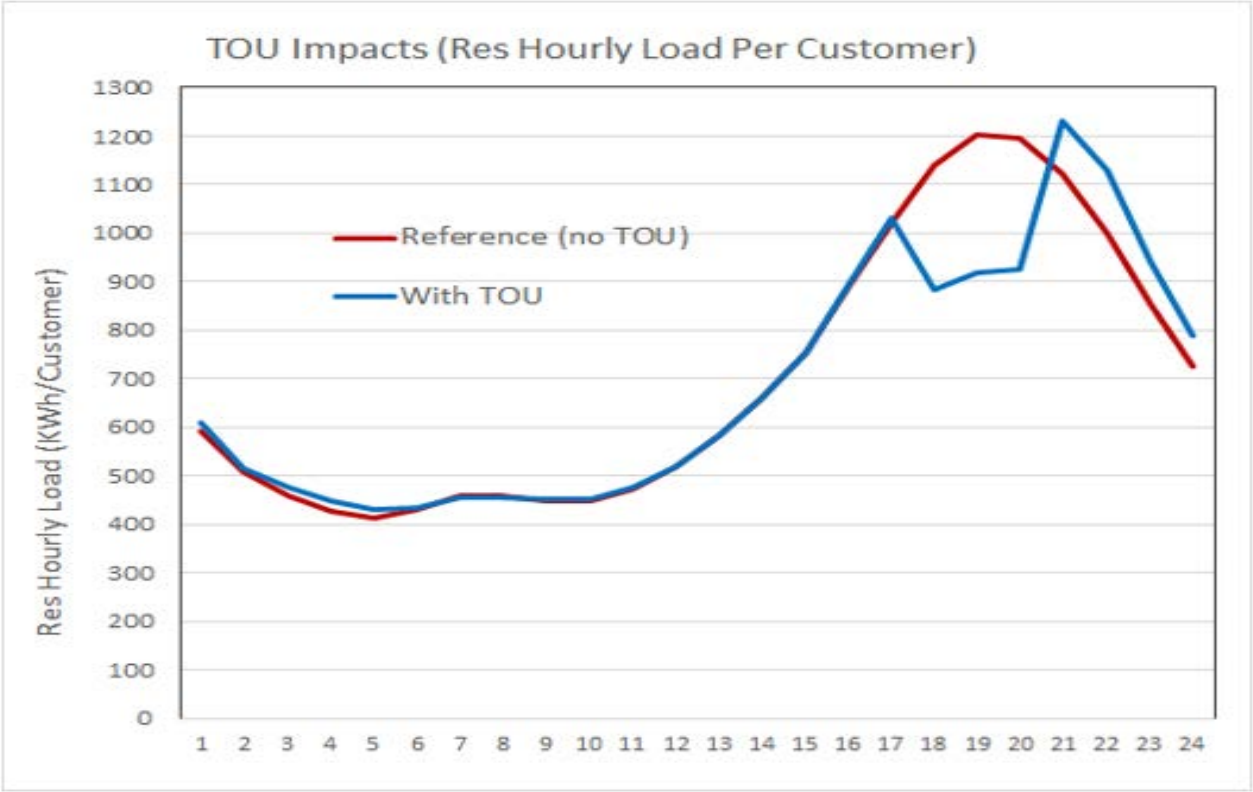


Table 7.2.2: TOU/TOD Peak Shift Impact

Condition	System Peak Hour
Without TOU	Hour Ending 19 (6:00-7:00 PM)
With TOU (incl. WHEV bounce-back)	Hour Ending 21 (8:00-9:00 PM)

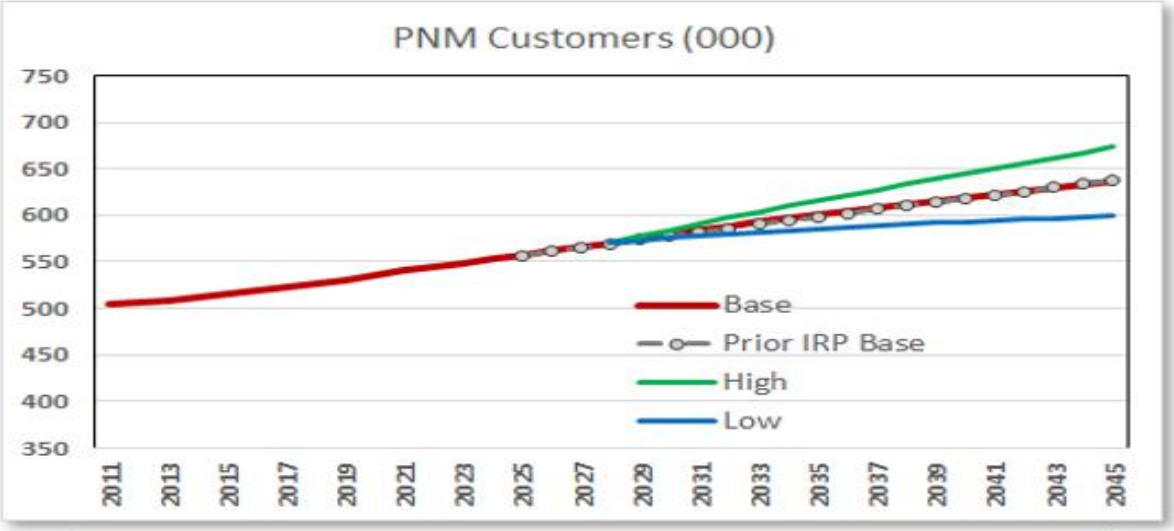
8. Energy Modeling and Forecasts

Energy models are based on customers and use per customer forecast models. Customer and use per customer are multiplied to get energy sales. The following describes the process.

8.1 Customer Forecast

Customer forecast is created based on economic variable that is described in the economic variable forecast earlier. Figure 8.1 shows PNM customer forecast and scenarios with prior IRP, followed by average annual customer gain in the forecast.

Figure 8.1: PNM Customer Classes by Size



Range	Average Annual Customer Gain				
	Res	SP	GP	LP	Total
2015-2025	3,921.1	240.6	4.5	-6.6	4,181.2
2025-2035	4,055.8	322.0	15.6	0.2	4,394.7
2035-2045	3,262.4	320.6	13.9	0.3	3,597.2
Range	Average Annual Growth Rate				
	Res	SP	GP	LP	Total
2015-2025	0.83%	0.45%	0.10%	-3.49%	0.78%
2025-2035	0.79%	0.58%	0.36%	0.10%	0.76%
2035-2045	0.59%	0.54%	0.31%	0.19%	0.58%

*Total includes LS, Water, Irrigation, and Lighting classes

Table 8.1 shows customer models by class and the variables used to produce the forecast.

Table 8.1: Customer Forecast Models by Class

Customer Class	**Short-Term (Through 2028)**	**Long-Term (After 2028)**	**Key Drivers**
Residential (Res)	Trend model	Population elasticity	Population growth

Customer Class	Short-Term (Through 2028)	Long-Term (After 2028)	Key Drivers
Small Power (SP)	Trend model	Pop./Employment elasticity	Population and employment
General Power (GP)	Regression	Regression	Pop. and non-mfg. employment
Large Power (LP4)	Elasticity	Elasticity	Non-mfg. employment
Industrial	Direct input	Direct input	Known expansion plans

8.2 Energy Use and Sales Framework

The modeling process follows a two-step approach:

- Step 1: Forecast energy use per customer using regression models with end-use drivers and weather variables
- Step 2: Compute sales as Energy Use minus PV Generation

8.3 Statistically Adjusted End-Use (SAE) Framework

Residential and commercial energy models employ the SAE methodology, which accounts for appliance saturation, equipment efficiency, and thermal efficiency of buildings.

Table 8.2: SAE Model Data Sources

Data Source	Application	Coverage
EIA (2025 data, Mountain Region)	Initialize efficiency/saturation trends	National/regional benchmarks
PNM Efficiency Potential Study	Base-year intensities and saturations	PNM-specific calibration
PNM Load Research Data	Hourly/daily use estimates by class	Statistical sample, 2015-June 2022

SAE framework in Figure 8.3 and Table 8.3.1 shows the components of SAE framework. Table 8.3.1 describes subcomponents and drivers that impact those variables.

Figure 8.3: Residential SAE Model Framework

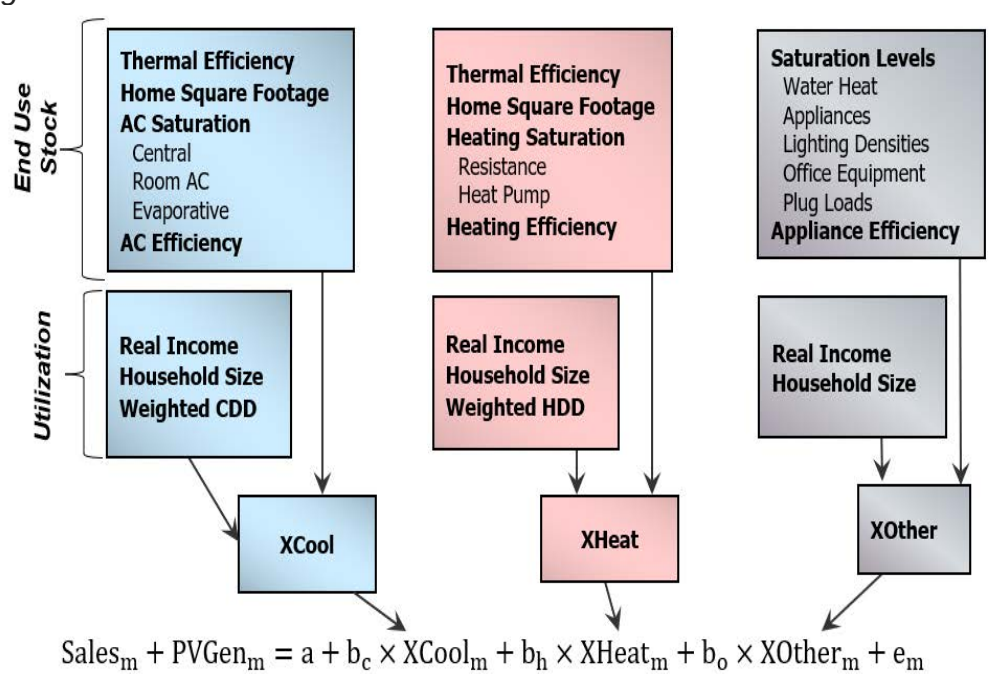


Table 8.3.1: Residential SAE End-Use Components

End-Use Component	Sub-Components	Utilization Drivers
Heating (XHeat)	Thermal eff., home sq.ft., heat saturation, heat efficiency	Income, household size, weighted HDD
Cooling (XCool)	Thermal eff., home sq.ft., AC saturation, AC efficiency	Income, household size, weighted CDD
Other (XOther)	Water heat, appliances, lighting, plug loads, efficiency	Income, household size

Table 8.3.2: SAE Framework Applicability by Customer Class

Customer Class	SAE Used	Notes
Residential	Yes	Full end-use decomposition
Small Power	Yes	Commercial SAE framework
General Power	Yes	Commercial SAE framework
Large Power (LP4)	Yes	Commercial SAE framework
Industrial	No	Direct customer input

9. Hourly Load and Peak Demand Forecasts

Hourly load and peak demand forecasts are created on multiple steps from creating models on a class basis to build monthly energy. The monthly energy forecasts are then calibrated with class level hourly load profile from load research. Electric vehicles (EV) and Photovoltaic (PV) were added to the forecasts along with industrial and economic development projects for future. Table 9.1 shows the bottom-up approach for the system hourly load forecast and it's step by step process from energy to demand.

9.1 Bottom-Up Methodology

The hourly system load forecast is constructed using a bottom-up approach:

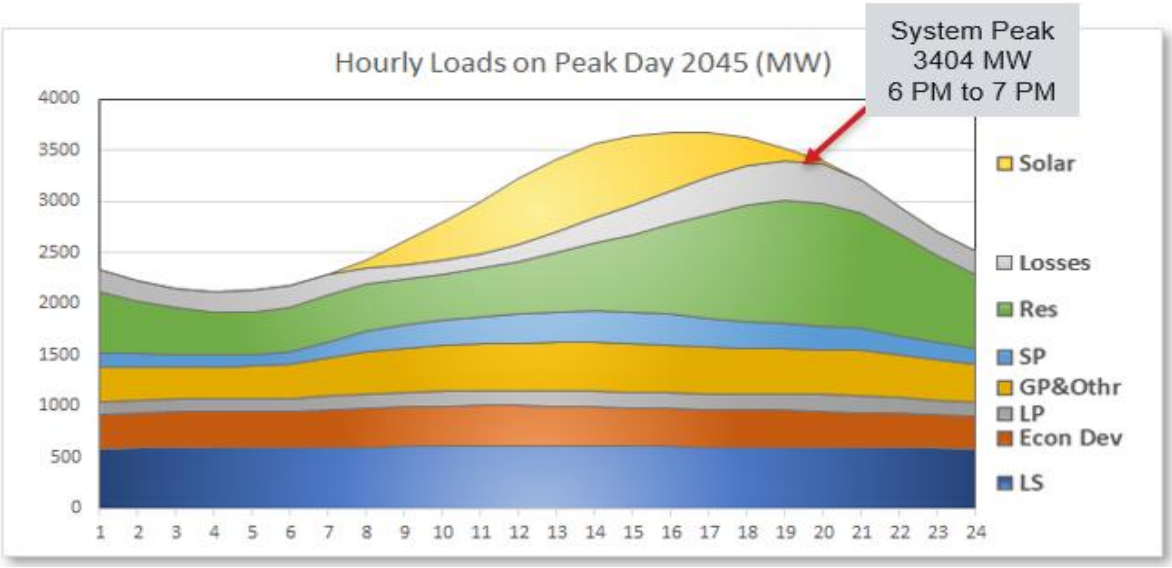
Table 9.1: Bottom-Up Hourly Load Construction Steps

Step	Process	Input	Output
1	Monthly sales forecast by class (excl. EV/PV)	Energy models	Calendar month class sales
2	Calibrate hourly profiles to monthly energy	Load research models	Hourly class profiles
3	Add incremental EV charging	EV profiles × energy	Hourly loads with EV
4	Subtract incremental PV generation	PV profiles × generation	Hourly net loads
5	Apply loss factors by voltage level	Loss factors	Loads with losses

Step	Process	Input	Output
6	Add industrial/econ development	Customer data	System load (pre-UFE)
7	Sum across all classes	—	Bottom-up system load
8	Apply UFE adjustment factors	Historical UFE	Final system load

Figure 9.1 shows the 2045 peak day and Figure 9.2 shows the 2045 low load day. One with the peak day shows 2045 peak day decomposition for different classes and the peak time of that day. This helps to show the shares of each class with losses along with solar.

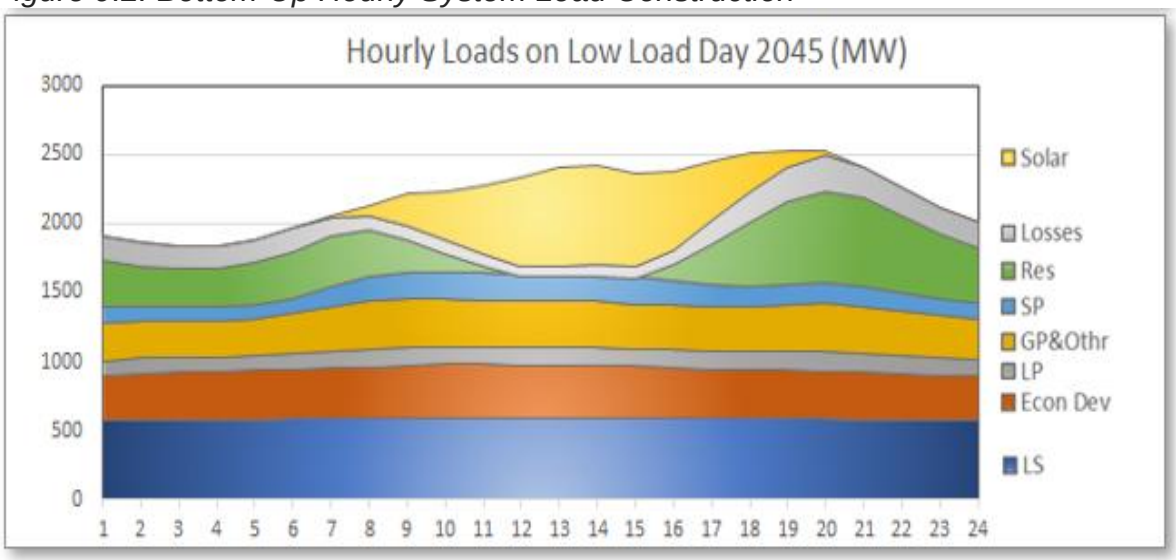
Figure 9.1. Hourly loads on Peak Day 2045 (MW)



The other figure shows a low day in 2045 with same decomposition of classes, losses and solar in it. This is very critical to know as this is change from current composition of load that exists in the system today. Integration of renewables and EVs in future

changes the load profile for different classes. The system profile look different from present day.

Figure 9.2: Bottom-Up Hourly System Load Construction



9.2 System Peak Demand

System peak demand under different conditions allows PNM system to analyze peak demand in CTP (Reference case) in MW and shows the peak demand amount 3404 MW with peak time with and without PV in the system. TOU/TOU analyses were done to see the impact on the peak and the peak time. Table 9.2 shows the system peak under different conditions.

Table 9.2: System Peak Summary

Metric	Value
Reference Case System Peak	3,404 MW
Peak Hour (with PV)	Hour Ending 19 (6:00-7:00 PM)
Peak Hour (without PV)	Hour Ending 17 (4:00-5:00 PM)

Metric	Value
Peak Hour (with TOU)	Hour Ending 21 (8:00-9:00 PM)

10. Forecast Scenarios and Results

10.1 Forecast scenarios

Forecast scenarios were created based on several drivers such as economic, weather, model uncertainty, BTM (Behind the Meter generation) and so. These scenarios are stitched with the reference scenario (Current Trends and Polices) on top of each case to create a probabilistic outcome for future for both energy and demand (Peak). Table 10.1 shows the buildup of scenarios.

The idea is to show each of the components' impact on CTP to test the system energy and demand. This helps to create band with CTP and to show how the system will change in forecast so we can plan better. In the CTP case, which is the base case, population and economic growth play a vital role to determine the future energy and demand. This is used as the plan to create a probable future that is likely to happen in the service territory. Table 10.1 shows different components of the forecast.

Table 10.1: Individual Component Cases

Component	High/Strong Case	Base/Reference	Low/Weak Case
Economics	High pop., employment, income	Base case	Low pop., employment, income
Weather	Hot summer, cold winter	10-yr normal	Mild summer, mild winter

Component	High/Strong Case	Base/Reference	Low/Weak Case
Model Uncertainty	+2%	0%	-2%
BTM PV	Low PV (675 MW)	Base PV (835 MW)	High PV (1,033 MW)
Electric Vehicles	High EV (387K)	Base EV (245K)	Low EV (164K)
Econ. Development	Ref. + 65 MW	Ref. (11 cust., ~400 MW)	Ref. - 110 MW
Industrial Growth	Planned expansion	Planned expansion	Smaller/slower
Electrification	Included	Not included	Not included
TOU	Included (some combos)	Not included	Not included

Note: In the Strong Growth scenario, "weak PV" means less solar offset (higher net load). In the Weak Growth scenario, "strong PV" means more solar offset (lower net load).

10.2 Economic Growth Cases

CTP (Reference Case) is created with base economic assumptions with normal weather. High Economic Growth (HEG) is based on high population growth,

employment, income, hot/cold weather. Low Economic Growth (LEG) is with low population growth, employment, income, and mild weather.

10.3 Weather Scenario and Short-Term Uncertainty

Weather scenario forecast is based on the 20 years hottest for summer and coldest in 20 years. This is based on 1 in 20 extreme cases. Normal weather conditions are 10-year average for both summer and winter. 2015 to 2024 is the basis for normal weather conditions. Low weather conditions are the mildest for both summer and winter with 1 in 20 mild cases. Table 10.2 shows the composition.

Table 10.2: Weather Uncertainty Bands

Scenario	Summer Condition	Winter Condition	Basis
High Weather	Hottest in 20 years	Coldest in 20 years	1-in-20 extreme
Normal	10-year average	10-year average	2015-2024 normal
Low Weather	Mildest in 20 years	Mildest in 20 years	1-in-20 mild

Table 10.3 shows the uncertainty band from the model.

Table 10.3: Model Uncertainty Band

Parameter	Value	Basis
Uncertainty Range	±2% of forecast	Typical year-ahead error
Interpretation	2-sigma confidence band	~95% confidence interval

10.4 EV and PV Scenarios

EV and PV are very important for forecast in PNM service territory. As these are integrated with the forecast, PNM investigated different scenarios for Light Duty Vehicle (LDV) and Photovoltaic (PV). Table 10.4 shows the scenarios.

Table 10.4: EV and PV Scenario Summary

Scenario	LDV Count 2045	PV Capacity 2045 (MW)	Prior IRP PV Base (MW)
High	387,000	1,017	1,054
Base	245,000	822	1,054
Low	164,000	668	1,054

10.5 Industrial Growth and Economic Development

Industrial growth and economic development is a lion share of load growth in the forecast. Table 10.5 shows the customer additions and timeline for these growths. PNM internally keeps the economic development data and updates frequently based on customer inputs.

Table 10.5: Economic Development Scenarios

Scenario	New Customers	Total New Load (MW)	Timeline
Reference Case	11	~400	By mid-2033
High Case	11+	~465 (+65)	By mid-2033
Low Case	11-	~290 (-110)	By mid-2033

11. Complex Scenarios

Load forecasts are not based on just one deterministic forecast. PNM investigated multiple scenarios based on different categories and followed a waterfall methodology. Next section explains this.

11.1 Waterfall Methodology

Complex scenarios are constructed using a waterfall approach that sequentially adds the impacts of individual component cases to the reference forecast.

Figure 11.1: Strong Growth Scenario — Waterfall Build-Up

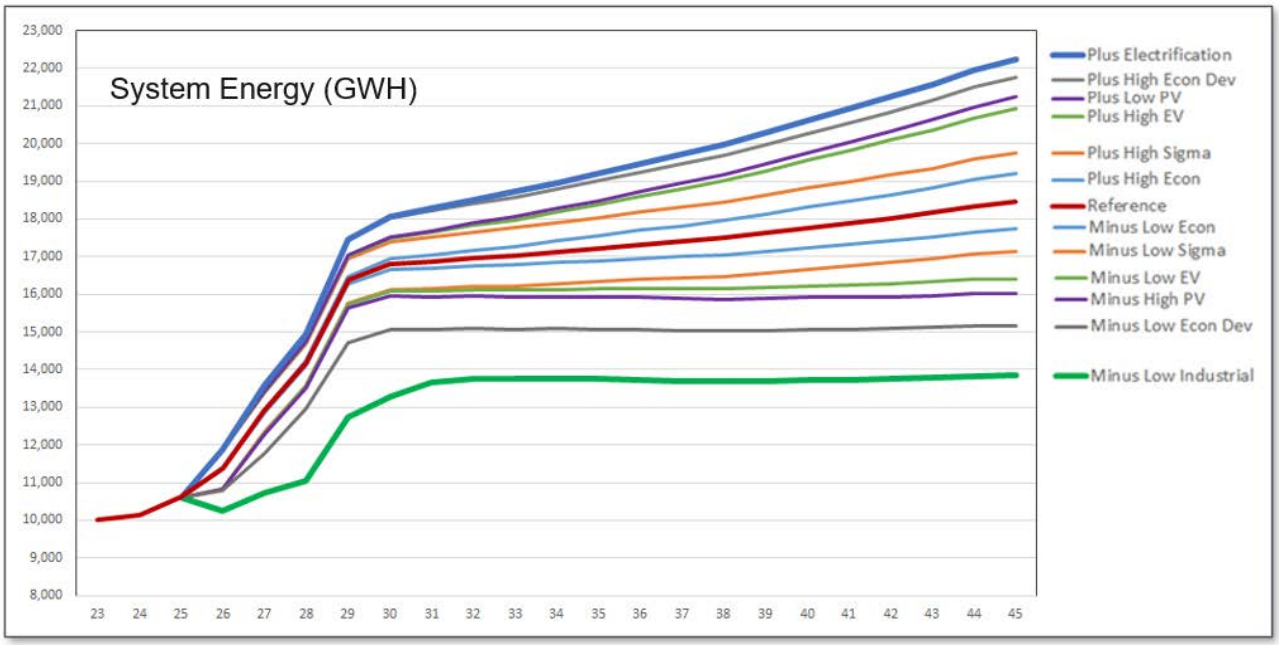


Figure 11.1 shows complex scenarios build up and Table 11.1 and Table 11.2 shows strong grown and weak growth scenarios compositions.

Table 11.1: Strong Growth Scenario Composition

Component	Case Used	Impact Direction
Economic Growth	High	Increases load
Weather	Strong (hot/cold)	Increases load

Component	Case Used	Impact Direction
Model Uncertainty	Positive (+2%)	Increases load
BTM PV	Weak (low adoption)	Less offset → higher net load
Electric Vehicles	Strong (high adoption)	Increases load
Economic Development	Strong	Increases load
Electrification	Included	Increases load

Table 11.2: Weak Growth Scenario Composition

Component	Case Used	Impact Direction
Economic Growth	Low	Decreases load
Weather	Weak (mild)	Decreases load
Model Uncertainty	Negative (-2%)	Decreases load
BTM PV	Strong (high adoption)	More offset → lower net load

Component	Case Used	Impact Direction
Electric Vehicles	Weak (low adoption)	Decreases load growth
Economic Development	Weak	Decreases load
Industrial Expansion	Weak	Decreases load

12. Energy Forecast Summary

The energy sales forecast reflects the combined effects of customer growth, appliance efficiency trends, BTM solar generation, EV adoption, building electrification, and TOU/TOD rate impacts. Key observations:

- Customer growth is driven primarily by population and employment trends
- BTM PV continues to offset load growth, though adoption has moderated vs. prior IRP
- EV charging is the most significant new load growth driver, with nonresidential charging dominant by 2045
- Building electrification shifts heating loads to electricity with significant winter peak impacts
- TOU rates shift peak timing but have modest total energy impact

Energy sales forecasts are provided by customer class:

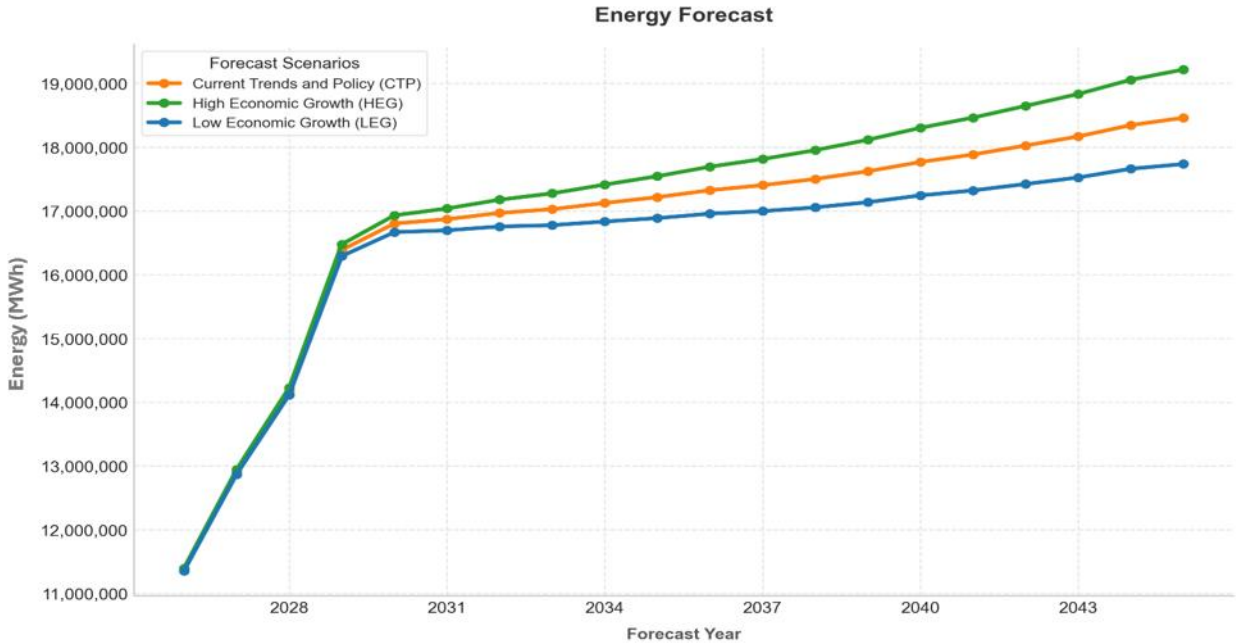
- Residential
- Commercial (Small Power + General Power + Large Power)
- Industrial (Large Service: Rates 5, 15, 30, 33, 35)
- Economic Development (not assigned to a specific rate class)
- Other (Irrigation, Water, and Lighting)

Below are the energy and demand forecasts that show the energy (GWh) forecasts for the whole system. Demand (MW). These forecasts are based on the best estimates that were described above with all the economic and weather forecasts.

12.1 Energy (GWh) forecasts

Energy (GWh) is expected to grow at 2.9% on average for the forecast horizon (2026 - 2045). Earlier in the forecast period energy grows faster than later due to industrial and economic development growth. This is the best estimate with CTP (Current Trends and Policies). Figure 12.1 shows CTP with HEG and LEG.

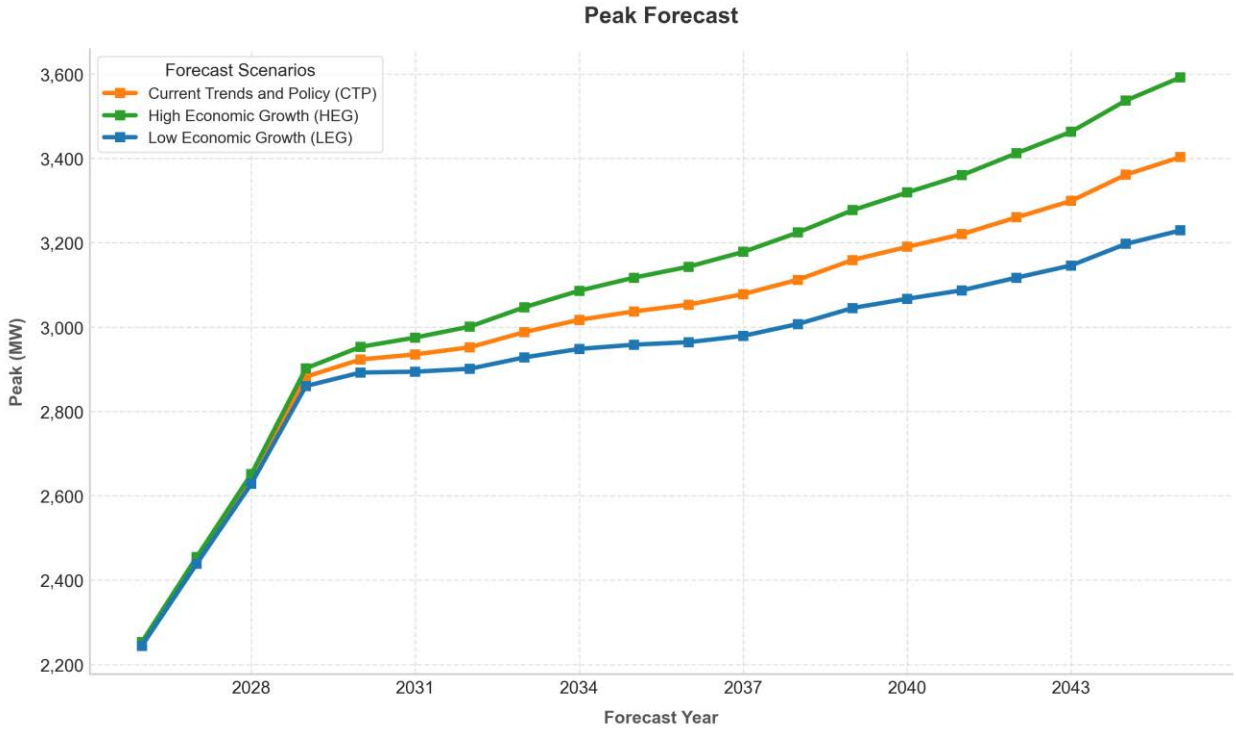
Figure 12.1: Energy Forecast (MWh)



12.2 Demand (MW) forecast

PNM's peak demand, which is approximately 2,117 MW in 2025, is expected to grow at an average rate of 2.24% per year over the 20-year IRP horizon. This forecast reflects current expectations for economic and demographic changes, economic development projects, behind-the-meter solar adoption, and electric vehicle adoption.

Figure 12.2: Demand (MW) forecast



Appendix H1: Glossary of Terms and Abbreviations

Term	Definition
AC	Alternating Current (solar: rated AC output)
ACEEE	American Council for an Energy-Efficient Economy
BTM	Behind the Meter — generation at customer premises
CDD	Cooling Degree Days
EPRI	Electric Power Research Institute
EV	Electric Vehicle
GHI	Global Horizontal Irradiation
GWh	Gigawatt-hours (1,000,000 kWh)
HDD	Heating Degree Days
IRP	Integrated Resource Plan

Term	Definition
kW / kWh	Kilowatt / Kilowatt-hour
LDV	Light Duty Vehicle
MW	Megawatt (1,000 kW)
NLR	National Laboratory of the Rockies
PNM	Public Service Company of New Mexico
PV	Photovoltaic (solar panels)
SAE	Statistically Adjusted End-use

Community Solar

The Community Solar Act, enacted by New Mexico's legislature in April 2021, requires PNM to interconnect 125 MW, plus tribal projects, of solar facilities to the distribution system across the utility serve area in Phase I of the program. Developers of community solar, known as Subscriber Organizations, are selected by the NMPRC program administrator and may sell subscriptions to utility customers anywhere in the utility's service area. The NMPRC has also set the Phase II capacity for PNM of an additional 185 MW, bringing the total for PNM to 310 MW. Phase II capacity selection will likely begin after the Rule 573 rulemaking process, scheduled to be completed by July 1, 2026.

Customers who subscribe to a community solar facility benefit from a credit on their electric bill from the utility. The utility receives the energy generated from the facility as well as the Renewable Energy Certificates (RECs). Per statute, at least 30% of community solar capacity is allocated to income-qualified subscribers or service organizations. PNM estimates that approximately 75,000 customers may eventually subscribe to community solar within the allocated Phase I and Phase II capacity.

Appendix H2: BTM Solar Forecasting Methodology

Technical Description

Integrated Resource Plan 2026

Load Forecasting — Distributed Energy Resources

June 2026

1. Overview

This document describes the methodology used to estimate behind-the-meter (BTM) solar photovoltaic (PV) capacity and generation, and its integration into the load forecasting framework for the IRP 2026. The approach combines scenario-based capacity projections, irradiance-driven production modeling, and load adjustment techniques to quantify the impact of distributed solar on utility sales.

The methodology consists of three primary components:

- Capacity Forecasting — scenario-based projections of annual BTM solar additions
- Solar Generation Modeling — irradiance-driven production functions with temporal allocation
- Integration with Load Forecasting — use vs. sales framework distinguishing end-use demand from utility-observed load

Together, these components provide a comprehensive, auditable framework for estimating the impact of distributed solar across the forecast horizon through 2045.

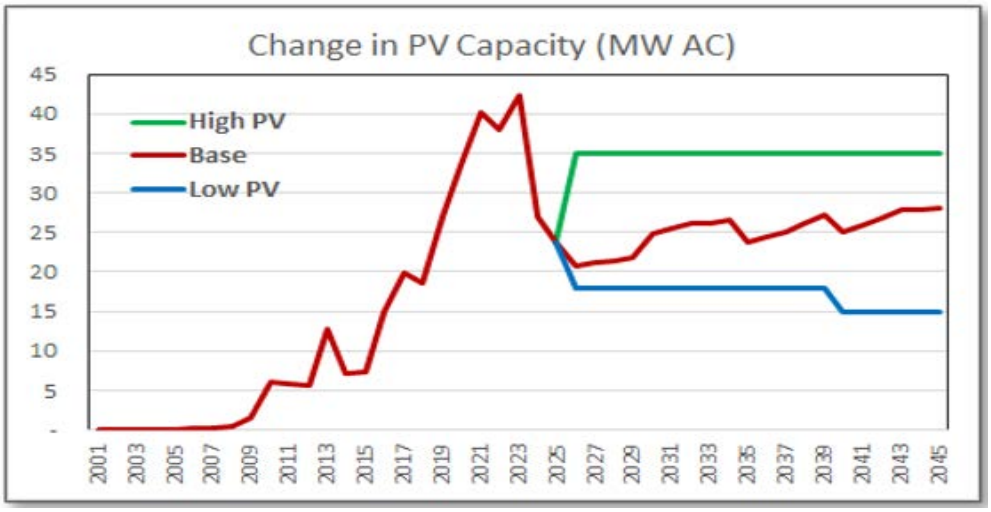
2. PV Capacity Forecast

2.1 Annual Capacity Additions

BTM PV adoption is modeled using three scenarios — High, Base, and Low — representing different assumptions regarding policy conditions, market adoption rates, and customer participation incentives.

The progression of annual capacity additions is illustrated in Figure 1 below.

Figure 1. Change in PV Capacity — Annual Additions by Scenario (MW AC)



As shown in Figure 1, historical additions exhibit considerable variability in the period prior to 2025, reflecting fluctuations in incentive structures and market conditions. Following the 2025 inflection point, annual additions stabilize into distinct scenario-defined trajectories:

- High Scenario: approximately 35 MW per year
- Base Scenario: approximately 25–30 MW per year
- Low Scenario: approximately 15–18 MW per year

The divergence across scenarios reflects uncertainty in long-term adoption drivers, including the anticipated policy changes beginning in 2025 and evolving customer economics for distributed generation.

2.2 Total Installed Capacity

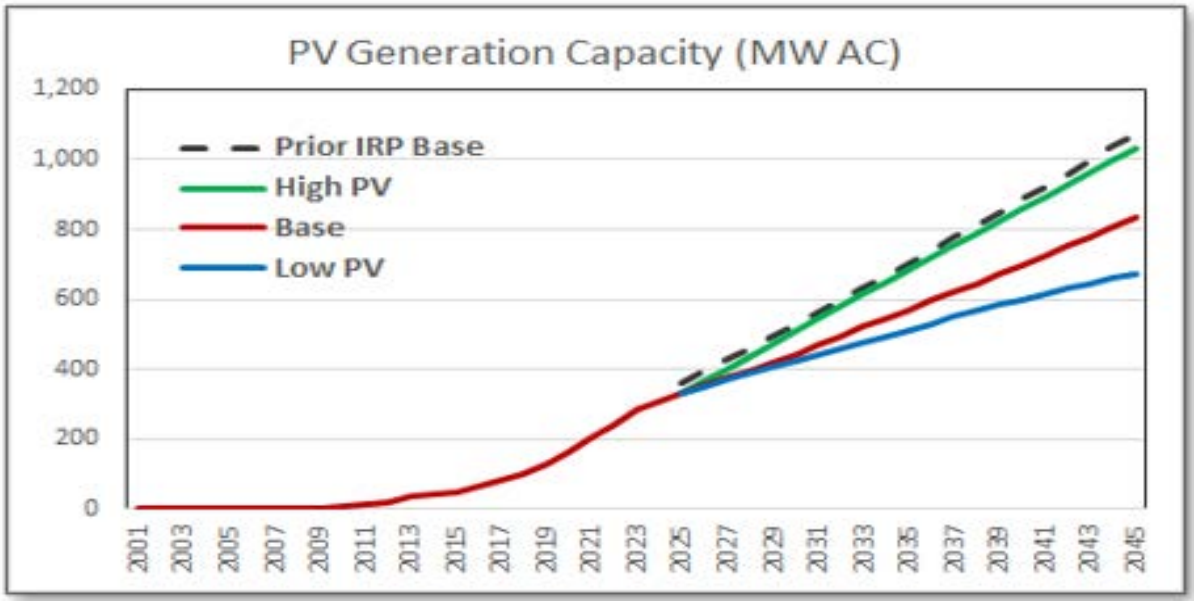
The base PV forecast has been reduced from the prior IRP, reflecting a slowdown in installations during 2025 and subsequent policy changes. PNM created high and low scenarios of the BTM capacity forecast based on real data in the system along with the National trend.

Table 1. BTM Solar Capacity Scenarios

Year	Base PV (MW)	High PV (MW)	Low PV (MW)
2025	332	332	332
2030	457	507	417
2035	582	682	502
2040	707	857	587
2045	835	1,033	675

Cumulative BTM PV capacity is derived by applying annual additions over the historical and forecast periods. The resulting trajectories are presented in Figure 2 below.

Figure 2. Total PV Generation Capacity by Scenario with Prior IRP Comparison (MW AC)



As illustrated in Figure 2, total BTM PV capacity increases materially through 2045 under all modeled scenarios. Key observations include:

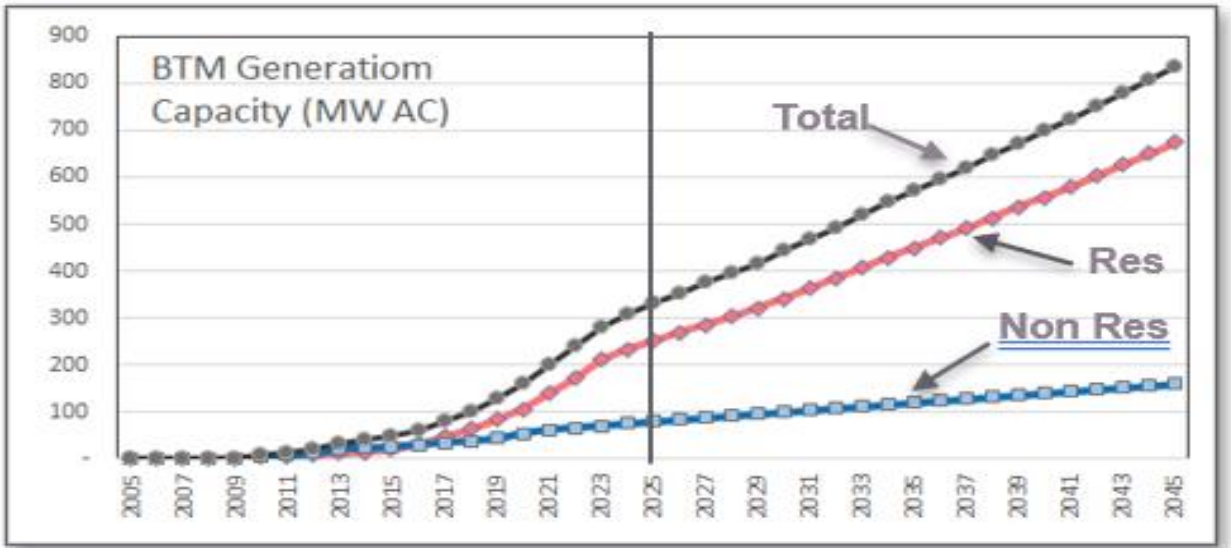
- The High scenario approaches the trajectory established by the prior IRP base case
- The updated Base scenario reflects a downward adjustment relative to prior planning expectations, attributable to expected near-term policy changes and market slowdown
- The Low scenario results in substantially lower long-term penetration relative to both the High scenario and prior IRP assumptions

This comparison to the prior IRP base case, shown as a dashed reference line in Figure 2, is important for explaining the directional change in forecast assumptions to IRP reviewers.

2.3 Customer Class Allocation

BTM PV capacity is disaggregated into residential and non-residential customer classes. The distribution of installed capacity by class is presented in Figure 3 below.

Figure 3. BTM Solar Capacity by Customer Class — Residential and Non-Residential (MW AC)



As shown in Figure 3, residential installations account for the substantial majority of total BTM capacity throughout the forecast period. Non-residential capacity grows more gradually and represents a comparatively modest share of the total installed base. This composition has important implications for load forecasting, as residential BTM solar contributes disproportionately to load masking during daytime hours.

3. PV Generation Modeling

3.1 Production Function

BTM solar generation is estimated using a normalized production function that relates daily output per unit of installed capacity to solar irradiance inputs:

$$Y = f(X)$$

Where:

- Y = Daily average generation (kWh per kW of installed capacity)
- X = Daily Global Horizontal Irradiation (GHI, kWh/m²/day)

Total energy generation is computed by scaling the normalized output by total installed capacity:

$$\text{Generation (GWh)} = \text{Capacity (kW)} \times \text{kWh/kW} \div 1{,}000{,}000$$

This production function is calibrated using historical generation data from metered BTM systems and corresponding GHI observations. The relationship captures the primary

weather-driven driver of PV output while maintaining a simplified, interpretable structure appropriate for long-range planning.

Figure 4 shows 2018 daily GHI as an example. The hourly GHI information on a typical clear day and on a cloudy day is shown in Figure 5.

Figure 4. 2018 Daily GHI Sum

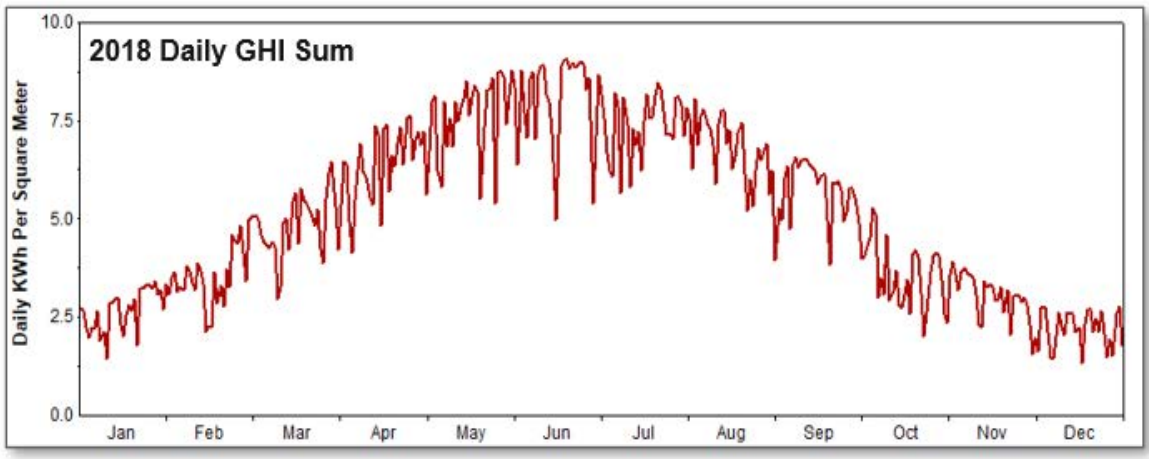
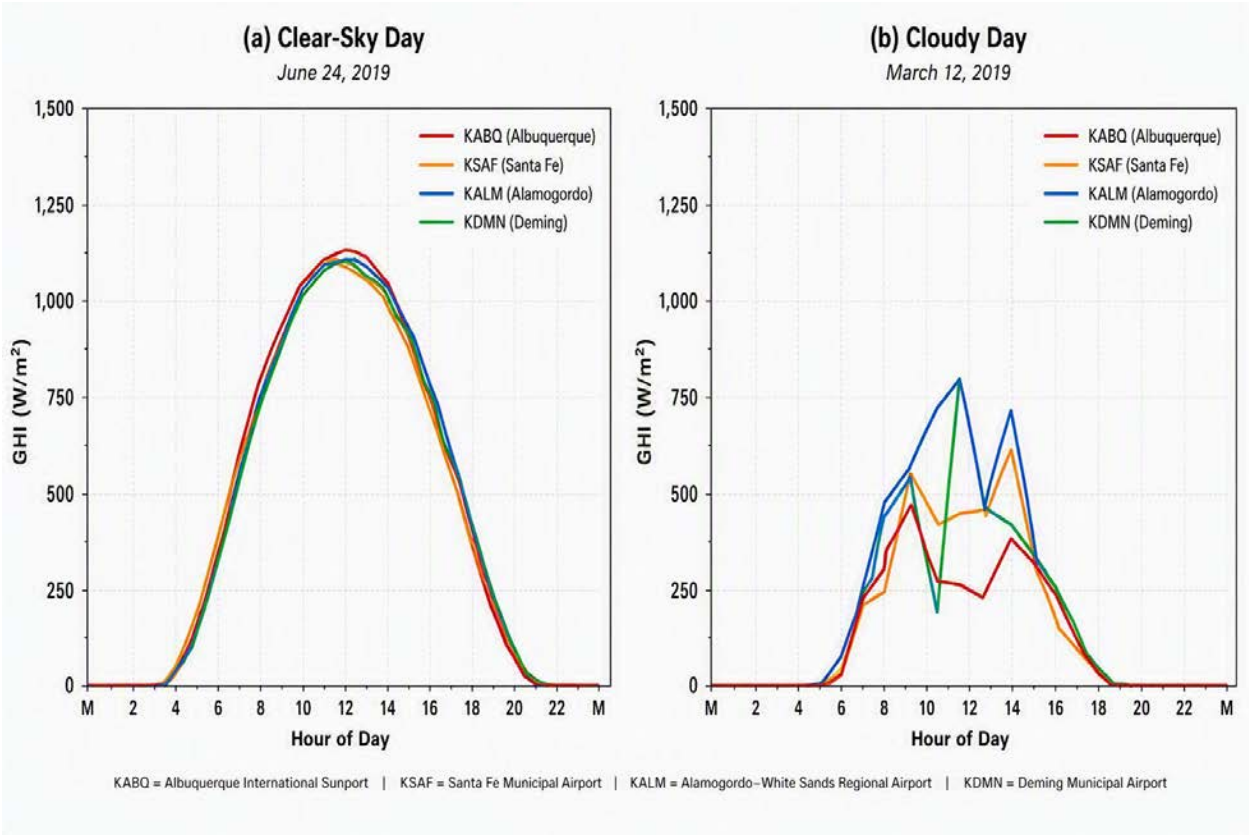


Figure 5. Hourly GHI on a clear day and cloudy day for different weather stations



3.2 Temporal Allocation

Daily generation estimates are allocated to hourly values using representative hourly irradiance profiles, derived from the AccuWeather solar resource dataset. This disaggregation ensures:

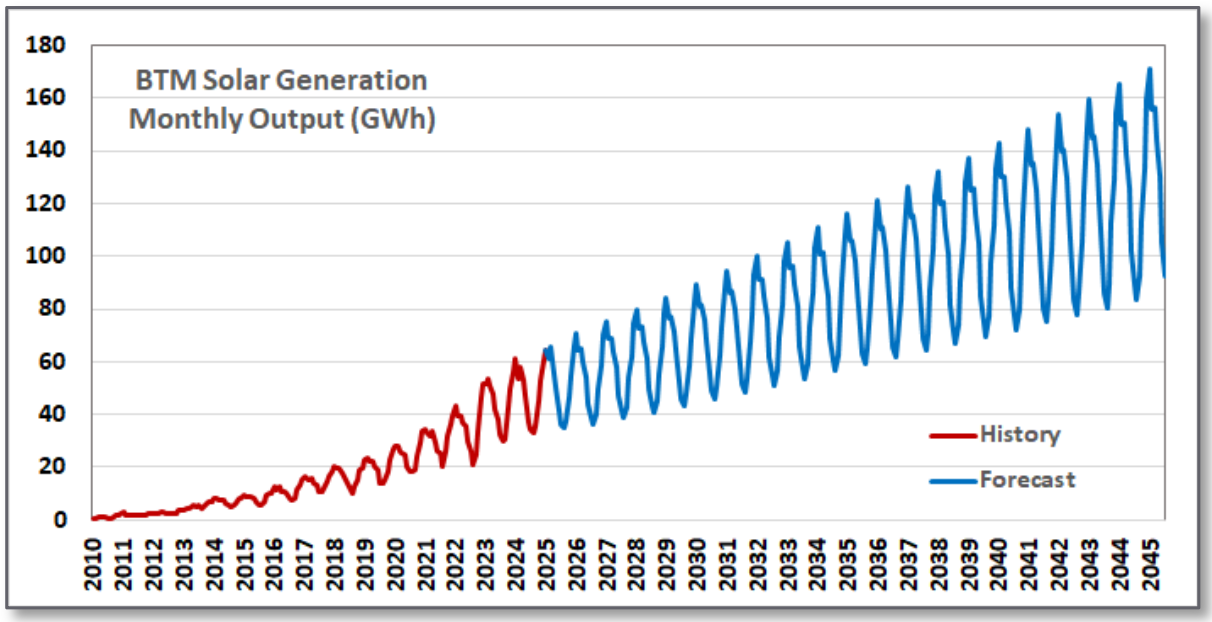
- Alignment with hourly load shapes used in the broader load forecasting model
- Realistic intraday solar production patterns consistent with observed PV system behavior
- Proper representation of morning ramp-up and evening ramp-down in net load profiles

The temporal allocation step is critical for accurately characterizing the peak-offset effect of BTM solar on utility-supplied load, particularly during afternoon demand periods.

3.3 Seasonal Generation Patterns

The resulting generation forecasts exhibit strong seasonal variability, driven by both solar irradiance availability and installed capacity growth. Monthly BTM solar generation — both historical and forecast — is presented in Figure 6 below.

Figure 6. BTM Solar Monthly Generation — Historical and Forecast with Seasonal Variability (GWh)



As shown in Figure 6, monthly generation follows a recurring seasonal cycle throughout the full time series. The figure illustrates:

- A clear transition from observed historical generation to modeled forecast values, with the breakpoint at approximately 2025

- Consistent peak production during high-irradiance periods and reduced output during winter months
- Increasing amplitude of seasonal variation over time, reflecting growth in installed capacity as shown in

This seasonal structure is consistent with expected solar generation profiles for the service territory and reinforces the importance of irradiance-based shaping within the production model. The interaction of capacity growth and seasonal irradiance patterns drives increasing load masking during summer months over the forecast horizon.

4. Integration with Load Forecasting

4.1 Use vs. Sales Framework

The BTM solar methodology is integrated into the load forecasting process through a use-versus-sales construct. Under this framework, total customer energy requirements (end-use load) are estimated independently of distributed generation, and utility sales are derived by netting out BTM solar generation:

> *Utility Sales = End-Use Load − BTM PV Generation*

This separation ensures that the forecast accurately represents the distinction between true customer demand and the portion of that demand served by utility-supplied energy. It also facilitates transparent scenario analysis, as changes in the PV adoption scenario flow directly and traceably into changes in projected utility sales.

4.2 Impact of BTM Solar

BTM solar reduces utility-supplied load through a load masking effect, where customer self-generation offsets a portion of observable system load. This effect has both temporal and magnitude dimensions:

- Temporal: load masking is concentrated during daytime hours and peaks during summer months, consistent with the seasonal patterns shown in Figure 6
- Magnitude: the cumulative impact grows substantially over the forecast horizon as total installed capacity increases
- Customer class: because residential installations represent the dominant share of total BTM capacity, the masking effect is most pronounced in the residential segment of the load forecast

The combined effect of rising capacity and seasonal generation patterns means that utility-observable load increasingly diverges from true end-use demand over time. Properly accounting for this divergence is essential for accurate resource adequacy planning and for avoiding the systematic underestimation of peak demand that can result from relying solely on observed load data.

Figure 7 shows monthly residential energy sources with PNM sales and BTM generation, and Figure 8 and Figure 9 show a typical low day and peak day with BTM and PNM sales.

Figure 7. Monthly residential energy sources with PNM sales and BTM generation

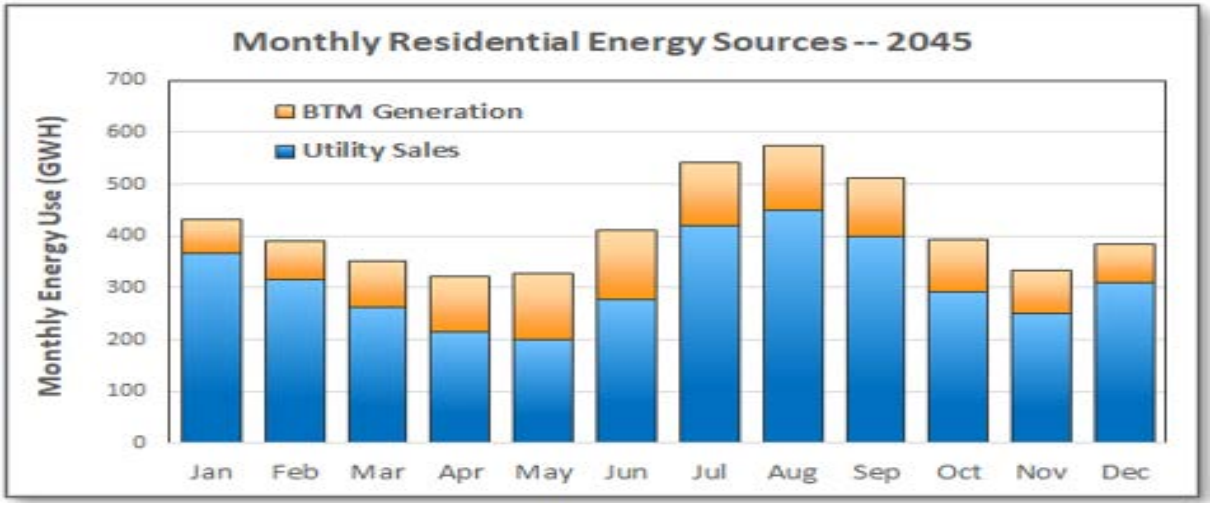


Figure 8. Residential energy sources in the low load day (2045)

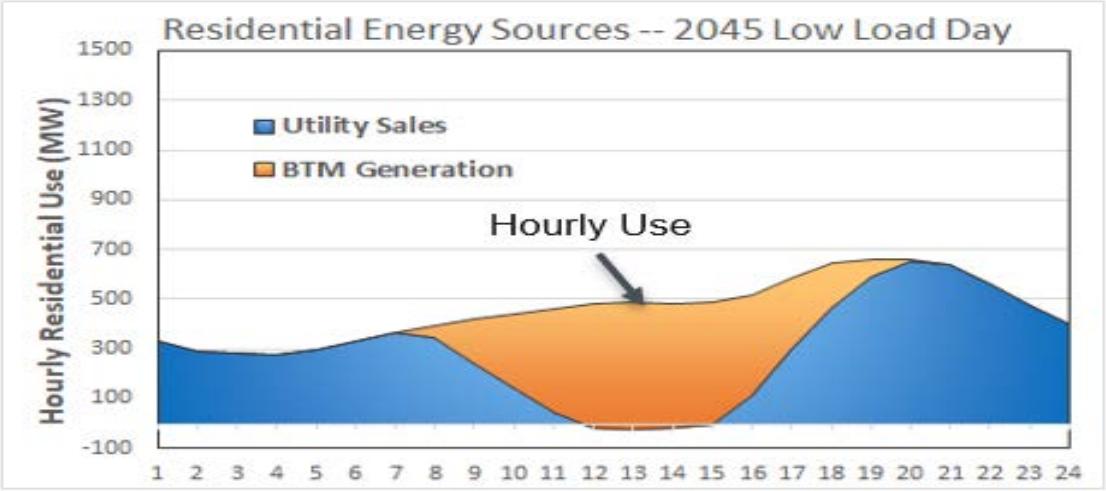
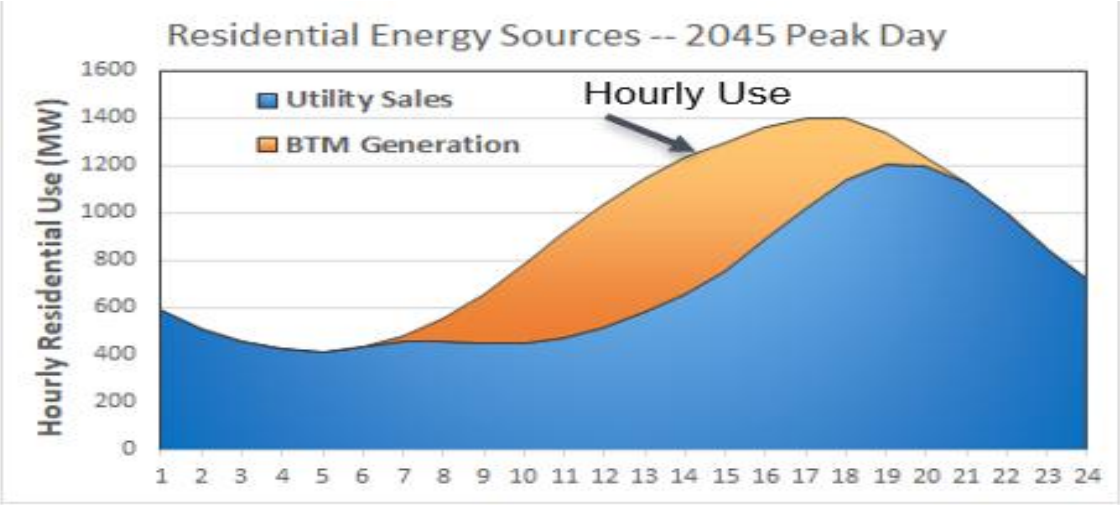


Figure 9. Residential energy sources in the peak day (2045)



5. Key Observations

The following summary observations are drawn from the methodology and supporting figures:

Observation	Detail
Scenario Sensitivity	Capacity outcomes vary significantly across adoption. The spread between High and Low scenarios is material to resource planning outcomes.
Residential Dominance	Residential PV drives the majority of BTM growth and associated load masking impacts. Non-residential contribution is comparatively modest throughout the forecast period.
Seasonality	Solar generation exhibits strong and increasing seasonal behavior over the forecast horizon. Summer peak periods experience the greatest load offset from BTM generation.
Sales Impact	BTM generation materially reduces utility sales relative to end-use load, with the gap widening over time. This underscores the importance of the use-versus-sales separation in the load forecast.
Policy Sensitivity	The 2025 inflection point is prominent in both Figures 1 and 2, reflecting the anticipated policy change. Scenario design explicitly captures uncertainty in the post-2025 policy environment.

Appendix H3: Comparison Between ICF's EE savings and Itron's EE savings

Executive Summary

This document outlines key methodological and goal differences between the Energy Efficiency (EE) Plan Forecast (Program Potential) and Itron's EE Forecast embedded in the load forecast that is used for the Integrated Resource Plan (IRP). The EE Plan Forecast focuses solely on utility program impacts, while the Itron's EE Forecast (Load Forecast) incorporates broader efficiency gains from appliance standards and technological improvements. Utilities use load forecast for the long-term resource planning while the EE plan forecast is used to encourage the customers to save energy beyond codes and standards that are upcoming. PNM understands the EE importance in the resource plan because it may enable utilities such as PNM to avoid major capital investments for new power plants and transmission upgrades.

Overview

The EE Plan forecast does not align with the numbers for EE that are in the load forecast for IRP. The EE in load forecast are savings due to appliance standards and ongoing technology improvements. It estimates how Codes & Standards (C&S), technology and utility programs impact energy use by specific types of equipment (known as end-uses). The EE plan forecast, on the other hand, specifically target for more savings going forward by implementing specific EE programs. This is achieved by encouraging customers to replace an older appliance for a newer one that could be beyond C&S that are mandated by federal and state policy.

EE plan forecast may yield higher efficiency gain for a specific end-use because there might be more incentive doing so for a customer. This happens when a customer chooses to replace an appliance or equipment that is beyond the standard C&S already in place for that specific appliance or equipment.

EE plan forecast Methodology

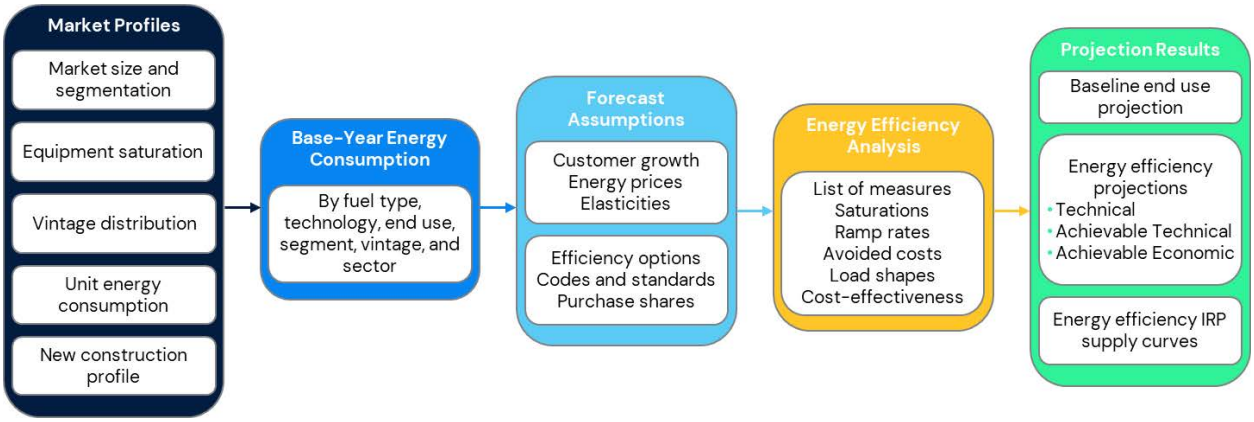
EE plan forecast is put together by a potential study which is done by estimating three levels of potential. They are –

- **Technical potential:** Maximum possible savings if all current equipment were replaced with the most efficient technology available, regardless of cost.
- **Economic potential:** A subset of technical potential that is cost-effective from a specific perspective (e.g., utility, societal, or customer).
- **Achievable potential (Or program potential):** A subset of economic potential that is a realistic estimate of what can be attained through actual program implementation, considering market barriers and customer adoption rates.

The purpose of this EE plan forecast might be to identify and quantify EE as a viable, cost-effective resource option that can offset the need for new power plants or transmission infrastructure in conjunction to saving energy.

PNM's EE plan was developed by using the help of ICF, a consulting company that specializes potential study. ICF used their tool called "VISIONLoadMAP" that analyzes market profiles, base year energy consumption, forecast assumptions, energy efficiency analysis to provide projections results. These projection results are then utilized to plan for PNM's EE plan forecast. Figure 1-1 shows a visual of the tool,

Figure 1-1: VisionLoadMAP Analysis Framework



Baseline Projection

ICF developed the baseline projection of annual electricity use for 2025 through 2045 by customer segment and end use without new utility conservation programs. The baseline projection is the foundation for the analysis of savings in future conservation cases and scenarios as well as the metric that potential is measured against. ICF developed the reference baseline in alignment with PNM's long-term demand forecast, but with some modifications to account for known future conditions.

Inputs to the baseline projection include:

- Customer growth projections
- Trends in fuel shares and equipment saturations
- Existing and approved changes to building codes and equipment standards

It should also be noted that this reference baseline does not include the following:

- Future DSM program impacts
- Climate change projections – to remain consistent with PNM's official load forecast, these projections assume normal weather conditions

- Does not include the explicit electrification of fossil fuels

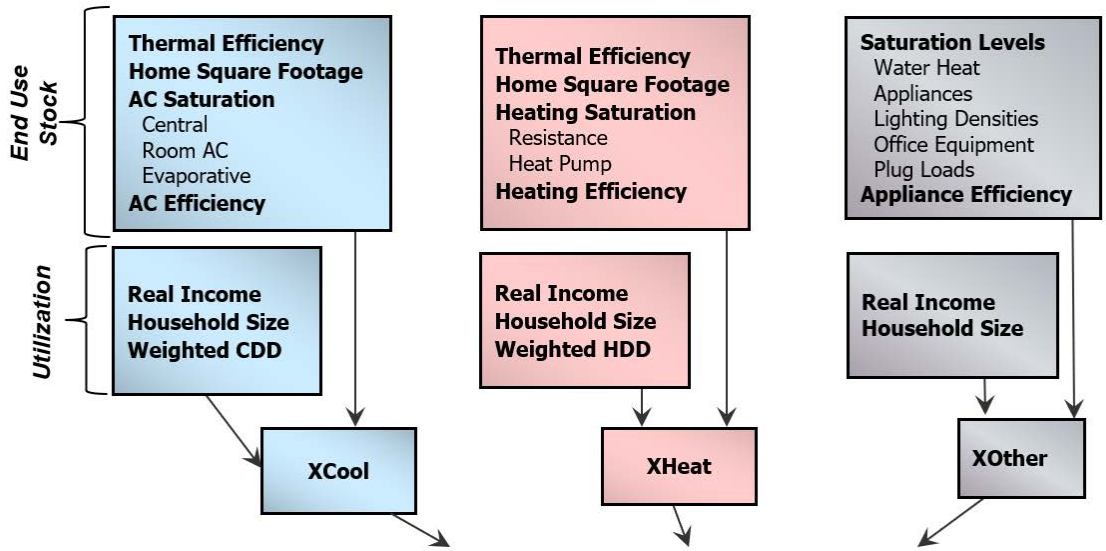
EE in load forecast Methodology

PNM's load forecast is a projection of future electricity consumption and peak demand. It inherently accounts for "naturally occurring" EE improvements (Federal appliance efficiency standards that are already market practice). Naturally occurring EE are embedded in historical consumption trends used for the load forecast.

Load forecast is used to estimate the amount of energy supply required to meet future demand, assuming current market and regulatory conditions continue.

Itron's SAE (Statistically Adjusted End-Use) model accounts for the efficiency gain based on the mandates. PNM uses Energy Information (EIA) data to incorporate the future C&S that will be implemented in the market. Figure 1-2 shows the SAE framework. "End-Use stock" in the figure below shows the efficiency gains that are considered in the framework to account for EE.

Figure 1-2: Statistically Adjusted End-Use (SAE) Framework



$$\mathrm{Sales_m} + \mathrm{PVGen_m} = \mathrm{a} + \mathrm{b_c} \times \mathrm{XCool_m} + \mathrm{b_h} \times \mathrm{XHeat_m} + \mathrm{b_o} \times \mathrm{XOther_m} + \mathrm{e_m}$$

PNM's load forecast captures the EE projection based on this SAE framework for residential and commercial customers. PNM construct customer load by adding the Distributed Energy Resources (DER) back to the sales for each sector to build true load for each sector.

EIA produces projections for different appliances and equipment for efficiencies, saturations, stock turnovers for these sectors every year. These data are available publicly and used for the load forecast that PNM develops. PNM constructs energy forecast by forecasting customer growth for each sector (Residential, Commercial,

Industrial) and by forecasting average energy use per customer for each sector. Customer growth projection is then multiplied by the average use per customer projection to get each sector's energy consumption. This consumption is then reduced by the Distributed Energy Resources (DER) projection to forecast the energy need for that sector.

This energy forecast is then used with the load research data to develop peak demand forecast. Peak demand forecast is also adjusted by the DER or any future loads such as emerging technologies (EV, data center etc.).

The Key Distinction

The key distinction between an EE plan forecast and EE in load forecast lies in the baseline.

- PNM's load forecast represents a future where only existing market-driven EE occurs with continued utility programs. These are the EE that are going to happen based on federal and state mandates and customer adoption depending on their choices. Utility programs in the forecast captured by taking the historical trends and assumed every program has a sunset. Econometric model captures this trend due to the use of historical data. This historical trend continues with the regression by the driver variable (Independent variable).
- The EE plan forecast provides future achievable EE in energy consumption which is yielded by being innovative and by implementing programs with the new technology and utility incentives.
- EE program plan is updated every year by assessing program effectiveness and annual savings. This is an impact driven model which is forward-looking and is designed for any potential extra savings.

It is worthy to mention here that baseline determination is very critical to estimate EE plan forecast from the potential study. Essentially the baseline freezes the C&S impacts for future and start the EE plan impact without the C&S which is naturally occurring savings. On the next page on Table 1 shows the EE savings from the load forecast Vs EE plan forecast in MWh from 2026 - 2045

Table 1: Total EE Incremental Forecast (Itron) vs EE Program Potential (ICF Potential Study) MWh (2026–2045)

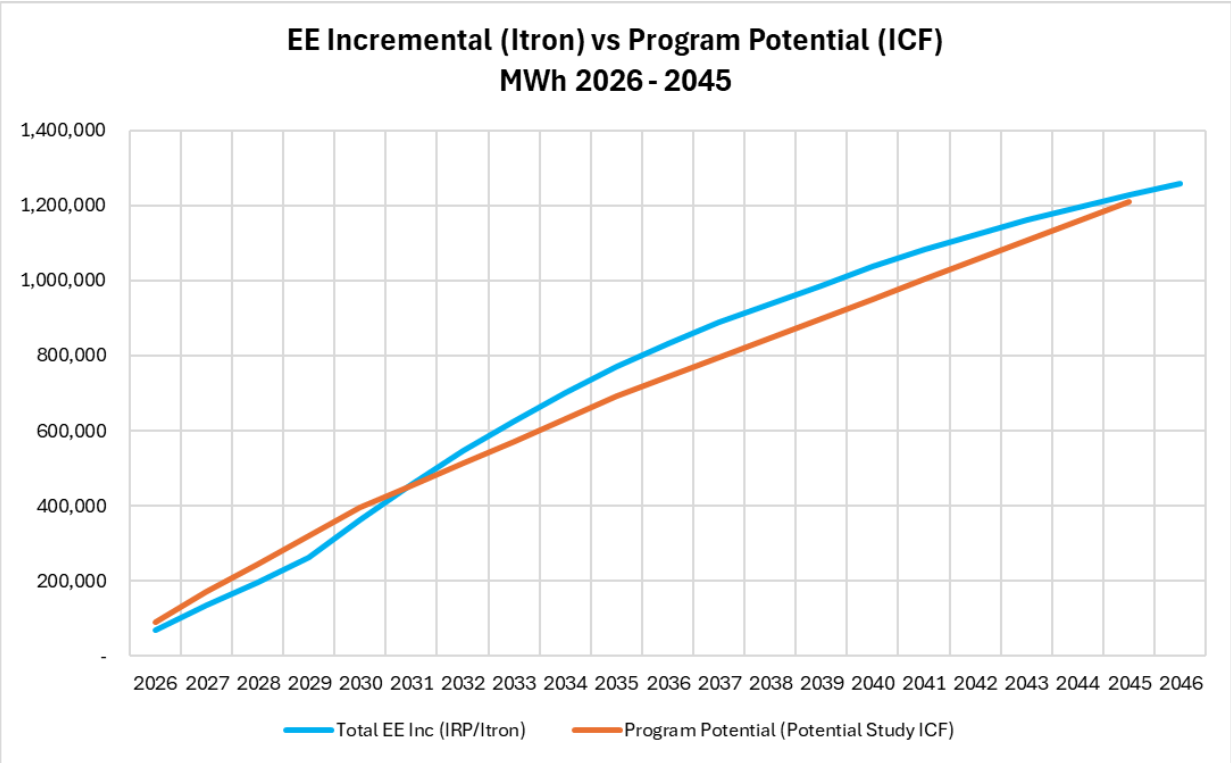
Year	Total EE Incremental (Itron)	Program Potential (ICF)
2026	69,426	89,000
2027	135,270	171,000

2028	196,982	245,333
2029	260,783	319,667
2030	360,660	394,000
2031	456,708	453,400
2032	547,501	512,800
2033	626,261	572,200
2034	700,968	631,600
2035	769,494	691,000
2036	831,806	743,000
2037	887,602	795,000
2038	938,835	847,000
2039	985,545	899,000
2040	1,036,276	951,000
2041	1,081,674	1,003,000
2042	1,123,108	1,055,000
2043	1,160,562	1,107,000
2044	1,195,342	1,159,000
2045	1,227,325	1,211,000

Figure 1-3 shows the graphical representation of Itron load forecast and EE plan forecast. It is noticeable that PNM's load forecast shows more EE savings in the long run than EE plan forecast overall. Load forecasts start off with slower savings but catches up and grows faster. This is because the EE plan forecast is aggressive at the start and slows down later due each program life span.

In essence, this is better for planning for resources because PNM is capturing most of the savings through the load forecast which enables PNM to plan for future resources better.

Figure 1-3: EE incremental (Itron Load Forecast) Vs Program Potential (EE plan forecast)



Summary

Energy efficiency (EE) is one of the fundamental aspects that PNM takes into considerations when planning for future resources. In the integrated resource plan (IRP) EE is, even though, considered from the load forecast, EE plan forecast is taken into equation. If EE plan forecast yields greater savings from a specific program, the savings impact our resource plan. This is done by comparing the underlying EE numbers from the load forecasts and the specific program savings that may not be captured in the load forecasts due to the nature of forecasting framework, such as building shell improvement for better heating or cooling efficiency. This scenario is rare but can happen.

Appendix H4: Economic Development Scenario Summary

The economic development scenario combines industrial growth and new large customer additions to define load growth uncertainty in the IRP. In the reference case, approximately 11 new customers are added, resulting in about 400 MW of incremental load, with additions completed by mid-2033. The chart shows a distinct upward step-change in energy consumption around the late 2020s and early 2030s, reflecting the timing of these additions. The high case tracks above the reference with additional growth of approximately +65 MW, while the low case remains below the reference with a reduction of approximately -110 MW. Overall, the chart highlights that economic development drives discrete increases in load, creating divergence across scenarios and directly influencing resource planning, capacity needs, and timing of future investments.

Figure 1. Economic Development Scenario

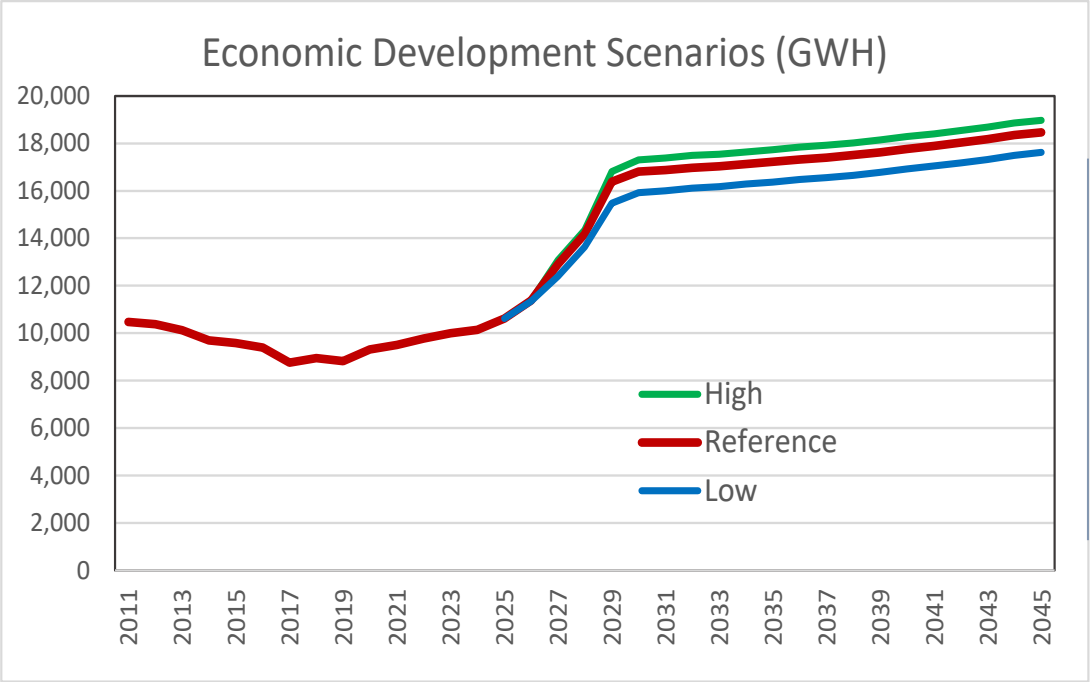


Table 1. Economic Development Scenario

Year	Annual System Energy (GWh)				Annual Peak (MW)			
	Base	Low Indust	High Econ Dev	Low Econ Dev	Base	Low Indust	High Econ Dev	Low Econ Dev
2025	10,615	10,554	10,615	10,612	2,130	2,127	2,130	2,130
2030	16,803	15,017	17,297	15,922	2,924	2,720	2,981	2,812
2035	17,217	15,885	17,732	16,373	3,038	2,885	3,098	2,936
2040	17,768	16,444	18,285	16,922	3,191	3,038	3,250	3,090
2045	18,461	17,130	18,977	17,618	3,404	3,251	3,463	3,303

APPENDIX I: GAS, CO_2, MARKET PRICE FORECAST

The commodity price forecasts for natural gas, carbon, and wholesale electricity markets used in the IRP were developed by Siemens. Forecasts for carbon, natural gas, and wholesale electricity prices are summarized in the tables below.

Table I-1. Forecast trajectories for natural gas, carbon, and wholesale market prices assumed in IRP

Natural Gas Price (Nominal $/MMBtu)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Henry Hub - Low	$3.20	$2.95	$2.26	$2.07	$2.15	$2.00	$2.19	$2.49	$2.52	$2.89	$2.93	$3.31	$3.55	$3.88	$4.17	$4.64	$5.07	$5.51	$5.47	$5.84
Henry Hub - Base	$4.32	$4.13	$4.07	$4.07	$4.11	$4.22	$4.33	$4.60	$4.94	$5.22	$5.62	$5.94	$6.33	$6.74	$7.31	$7.91	$8.62	$9.31	$9.90	$10.57
Henry Hub - High	$4.65	$5.74	$5.82	$5.60	$5.80	$5.83	$5.97	$6.64	$7.20	$7.64	$8.15	$8.66	$9.36	$10.06	$10.79	$11.76	$12.79	$13.73	$14.59	$15.52
San Juan - Low	$2.56	$2.55	$2.06	$1.82	$1.87	$1.69	$1.89	$2.20	$2.19	$2.60	$2.63	$3.02	$3.26	$3.56	$3.84	$4.29	$4.70	$5.11	$5.04	$5.40
San Juan - Base	$3.62	$3.77	$3.78	$3.84	$3.88	$3.98	$4.07	$4.33	$4.65	$4.92	$5.29	$5.59	$5.95	$6.35	$6.87	$7.43	$8.09	$8.75	$9.31	$9.93
San Juan - High	$3.88	$5.34	$5.44	$5.35	$5.61	$5.63	$5.75	$6.40	$6.94	$7.34	$7.80	$8.25	$8.90	$9.57	$10.27	$11.15	$12.10	$13.03	$13.79	$14.64
Permian - Low	$1.50	$1.93	$1.45	$1.33	$1.35	$1.17	$1.32	$1.55	$1.52	$1.85	$1.84	$2.16	$2.34	$2.57	$2.77	$3.13	$3.45	$3.77	$3.60	$3.86
Permian - Base	$2.28	$3.11	$2.99	$3.14	$3.17	$3.26	$3.33	$3.55	$3.81	$4.02	$4.33	$4.58	$4.87	$5.20	$5.63	$6.09	$6.63	$7.17	$7.62	$8.13
Permian - High	$2.45	$4.65	$4.46	$4.51	$4.74	$4.76	$4.88	$5.47	$5.94	$6.29	$6.68	$7.08	$7.65	$8.23	$8.81	$9.58	$10.38	$11.14	$11.86	$12.59

Natural gas prices reported reflect annual average of monthly basin projections. Monthly delivered prices are modeled in EnCompass.

Hydrogen Price (Nominal $/MMBtu)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Base	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21.36

CO2 Price (Nominal $/short ton)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Base	-	-	-	-	$12.82	$14.22	$15.78	$17.50	$19.41	$21.53	$23.89	$26.50	$29.40	$32.61	$36.17	$40.13	$44.51	$49.38	$54.78	$60.77
High	$106.5	$111.2	$116.15	$121.26	$126.57	$132.09	$137.82	$143.79	$149.98	$156.42	$163.68	$171.23	$179.09	$187.27	$195.77	$203.96	$212.46	$221.29	$230.46	$239.98
Low	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Wholesale Market Price (Nominal $/MWh)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Four Corners - Low	$67.12	$62.08	$53.48	$52.05	$56.04	$59.85	$58.43	$62.70	$66.82	$66.06	$61.38	$59.46	$59.22	$62.03	$59.79	$57.16	$52.51	$54.81	$57.35	$59.84
Four Corners - Base	$64.79	$63.78	$70.20	$72.48	$77.81	$88.06	$87.78	$91.43	$94.03	$94.61	$93.91	$94.41	$93.35	$93.79	$86.30	$80.94	$81.89	$84.28	$85.81	$88.89
Four Corners - High	$117.5	$110.9	$106.05	$104.20	$107.93	$114.80	$115.67	$110.51	$114.22	$114.26	$118.07	$117.41	$119.08	$114.27	$111.67	$100.33	$88.66	$80.88	$84.00	$83.73
Palo Verde - Low	$66.16	$64.71	$61.20	$61.36	$69.69	$77.19	$77.45	$81.95	$86.45	$87.05	$82.57	$80.08	$77.26	$79.71	$76.73	$74.53	$67.76	$69.36	$71.11	$74.96
Palo Verde - Base	$63.28	$65.70	$72.71	$76.45	$86.32	$99.50	$98.48	$101.48	$104.17	$107.04	$106.41	$106.78	$105.70	$108.22	$104.01	$99.30	$100.24	$103.31	$104.49	$111.46
Palo Verde - High	$109.48	$108.5	$104.07	$105.20	$114.06	$124.82	$128.43	$129.05	$136.82	$139.16	$143.64	$144.30	$141.48	$137.31	$134.92	$120.31	$108.45	$102.62	$108.14	$111.55
SPP South - Low	$28.23	$30.02	$31.25	$33.75	$36.56	$36.96	$35.58	$34.10	$34.56	$35.53	$35.27	$35.69	$35.26	$36.67	$36.92	$39.25	$41.10	$45.22	$48.44	$51.57
SPP South - Base	$27.59	$30.65	$35.88	$39.93	$44.75	$47.11	$47.60	$46.10	$50.04	$53.05	$53.94	$55.95	$55.62	$57.96	$58.84	$62.27	$65.83	$69.96	$74.33	$80.36
SPP South - High	$92.15	$97.83	$107.84	$118.60	$128.98	$135.05	$138.52	$140.91	$148.87	$156.20	$162.64	$166.89	$169.64	$175.30	$182.82	$187.24	$193.88	$204.40	$213.88	$227.29

Wholesale market prices reported reflect annual average projections. Hourly electricity prices are modeled in EnCompass.

APPENDIX J: PNM NATURAL GAS VOLATILITY STUDY

This appendix provides the PNM Natural Gas Volatility Study.

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Public Service of New Mexico **CONFIDENTIAL**

Natural Gas Price Volatility Study

July 2nd, 2026

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Executive Summary

Fuel price volatility analysis and its impact on the cost to produce electricity is a critical component of an integrated resource plan. Price volatility stems from a real or perceived supply – demand imbalance caused by disruptions to the delivery network, extreme weather events, geopolitical issues and other factors. Rather than relying on a single forward curve to model future fuel prices it is critical to evaluate a variety of scenarios such that potential price changes are factored into the resource plan creating a more robust analysis.

Siemens used a two-part approach consisting of a qualitative assessment of factors that could influence the regional gas market and a quantitative assessment of the impact of price volatility on PNM's gas requirements. The qualitative analysis was completed to assess the potential for fundamental shifts in energy price behavior due to changes in the underlying market structure. The study considered the potential commodity and basis pricing impacts from the following factors:

- Gas production and supply
- Pipeline capacity and infrastructure changes
- Liquified Natural Gas (LNG) exports
- Weather
- Inflation

The quantitative assessment was split into a long-term market simulation to create a series of future potential price paths. Those price paths were then tested against the forecasted gas supply requirement to estimate the potential variance in annual gas expense. Due to the long-dated nature of the simulation, the impact of short duration price spikes is muted. To account for this, Siemens used a historical price analysis that identified the magnitude, duration, frequency and financial impact of short-term basis price disruptions and the associated impact on gas load.

Energy markets are dynamic and constantly evolving with the shifting and conflicting priorities of low cost, reliability, and sustainability. Our analysis found that while there will be many changes in the desert Southwest gas markets in the next 20 years, we do not believe the net impact will significantly alter the regional market structure and therefore historical prices can be used to simulate future prices. Basis price spikes will continue to occur; however, they will be short duration, and tools exist to mitigate the impact. Lastly, long-dated market simulation indicates that price volatility will continue to exhibit similar patterns with annual cost variances in the $0.14 to $1.09/MMBtu range. This is a meaningful number however, similar to basis risk, the impact of long dated volatility on a rolling 2 – 5-year horizon can be effectively, and cost efficiently reduced to a tolerable level thereby reducing impacts to rate payers.

Fundamental considerations

Background and analysis inputs

PNM, formally known as Public Service Company of New Mexico, is the largest electric utility in the state of New Mexico, serving approximately 540,000 customers across a service territory that includes Albuquerque, Santa Fe, and surrounding communities in central and northern New Mexico. Founded in 1917, PNM has been a cornerstone of the state's energy infrastructure for over a century. The utility operates as a regulated investor-owned utility under the jurisdiction of the New Mexico Public Regulation Commission and is a subsidiary of PNM Resources, which also owns Texas-based utility Texas-New Mexico Power (TNMP).

PNM's generation portfolio has historically included a mix of coal, natural gas, nuclear, and renewable resources. The utility was a significant participant in the San Juan Generating Station, a large coal-fired power plant near Farmington, New Mexico, which was retired in 2022 as part of the state's broader energy transition efforts driven by the Energy Transition Act of 2019. PNM has been actively replacing retired coal capacity with solar, wind, and battery storage projects to meet the ETA targets. PNM continues to navigate the challenges of grid modernization, integrating distributed energy resources, managing wildfire risk, and maintaining reliability while transitioning to a cleaner energy portfolio in one of the sunniest and most wind-rich states in the country.

PNM’s 2026 IRP will be filed in September 2026 and as part of that process PNM agreed to perform a natural gas volatility study from the comments provided in the 2023 IRP process. For this 2026 IRP, PNM examined three planning cases, High Economic Growth (HEG), Low Economic Growth and the Current Trends and Policy (CTP) reference case.

PNM provided forecasted gas load data that was extracted from the CTP reference case. Graphical representation of that data is found in Figure One on page 7.

For the purpose of this analysis, Siemens evaluated the cost variability stemming from the generation profile and associated gas load as shown in the charts below.

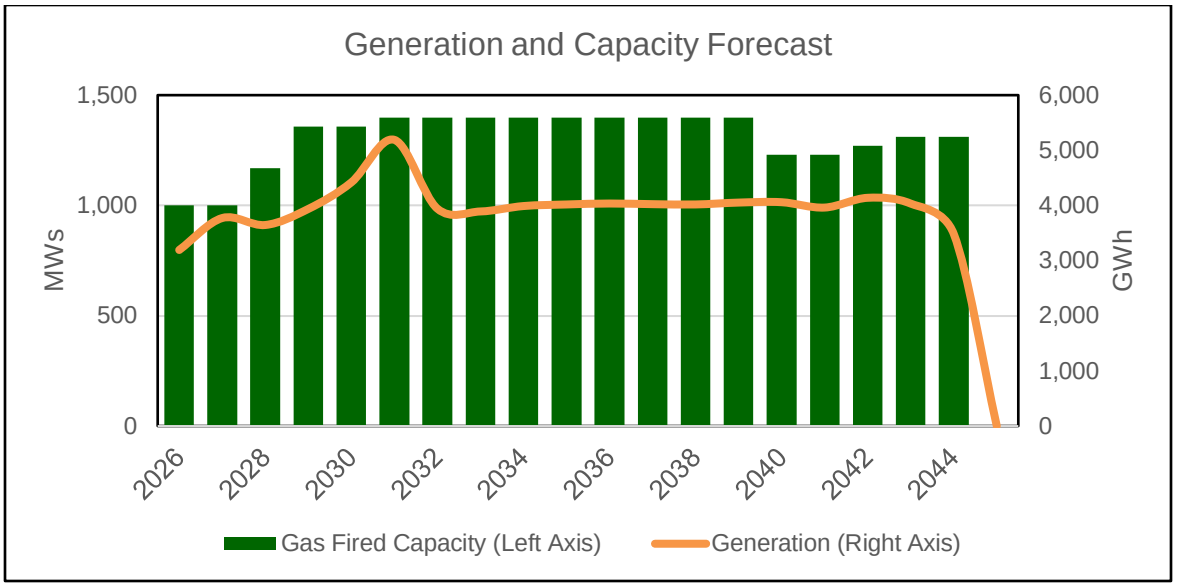

Figure 1 Generation and Capacity Forecast

(Capacity is reported in MWs, annual generation is in GWh)

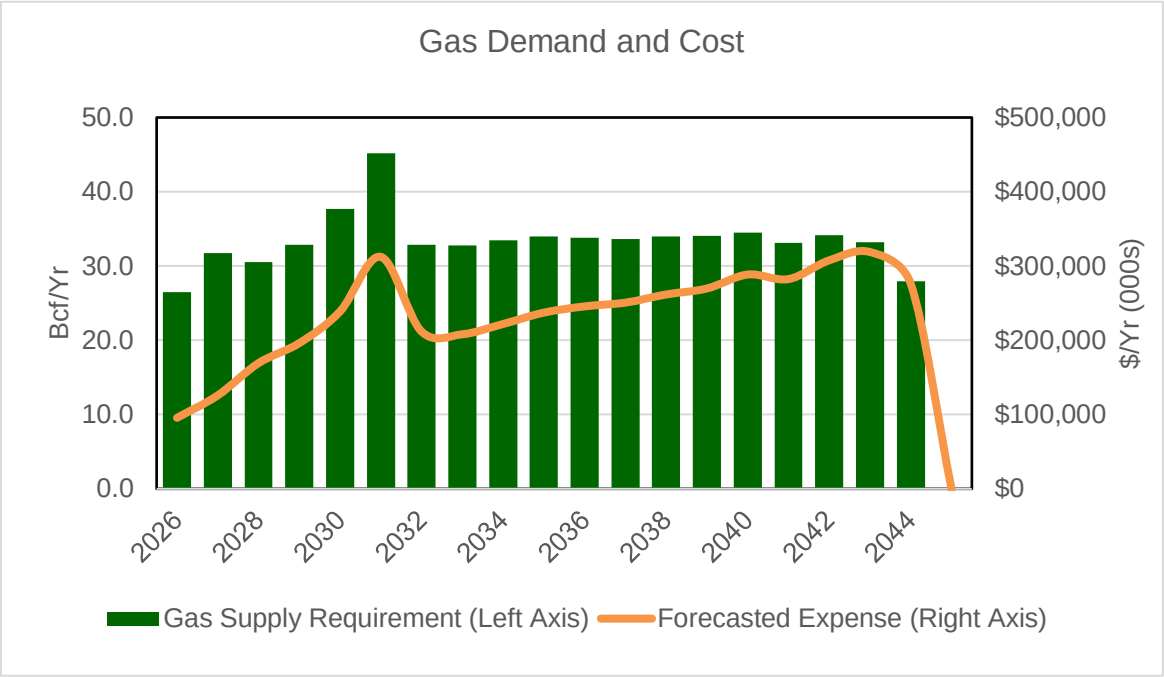

Figure 2 Gas Demand and Cost

The above volumes and associated costs were tested for sensitivity to market volatility using 3 years of historical data and then bifurcating NYMEX Henry Hub risk from basis risk into four different basis locations. PNM purchases the majority of its gas based on the El Paso San Juan or Keystone Pool indices however, for the sake of thoroughness Siemens evaluated several adjacent markets and then tested for correlation to confirm

the impact of basis price spikes in adjacent markets on prices for PNM. Those results are presented in the conclusions section of the quantitative analysis results.

The US natural gas market is very dynamic and rapidly evolving. The impacts of fracking, changes to the IRA, new pipeline builds, increased LNG, data center growth and numerous other factors will move the market in different directions as those competing factors try to reach equilibrium. Many of the assumptions used in this analysis are based on years of experience in the market and represent the best estimate of the future direction of price and volatility.

Domestic supply and production analysis

Natural gas production in the western United States is expected to continue growing over the next several years, driven by both legacy Rockies output and strong gains in associated gas from oil plays such as the Permian in west Texas and southeast New Mexico. Federal forecasts indicate U.S. marketed gas will reach new record highs in 2026–2027, with a disproportionate share of incremental volumes coming from western basins and the Gulf Coast corridor. In the broader North American context, tight gas plays in the Rockies and gas focused activity in parts of the Permian and Mid Continent are expected to mature but still contribute to net growth into the 2030s.

Within the Permian Basin itself, natural gas output is forecasted to rise steadily as oil directed drilling continues and gas oil ratios climb in maturing fields. EIA's latest outlook shows Permian marketed gas reaching roughly 25.8 Bcf/d in 2026, after adding about 1.9 Bcf/d in 2024 and another 1.0 Bcf/d in 2025, making the basin a major driver of U.S. supply growth. Recent revisions to Permian shale play mapping also lift estimated 2026 shale gas output by about 0.8 Bcf/d, underscoring how new zones and productivity gains are reshaping the basin's gas profile.

Longer term Permian forecasts suggest continued expansion in both associated and non-associated gas as drilling technology improves, and more gas focused development becomes economic relative to other basins. Some private forecasts see Permian gas focused production growing from around 4 Bcf/d in the early 2020s to roughly 5 Bcf/d by the early 2030s and to more than 9 Bcf/d by 2040, supported by rising initial well productivity and gradual increases in well count. At the same time, pipeline expansions out of the basin, including new late decade projects, are expected to alleviate constraints and allow higher flows to Gulf Coast LNG terminals and western demand centers.

As reflected in the chart below, US natural gas production is forecasted to continue to rise through 2045 in all but the low case scenario where production is seen to decline.

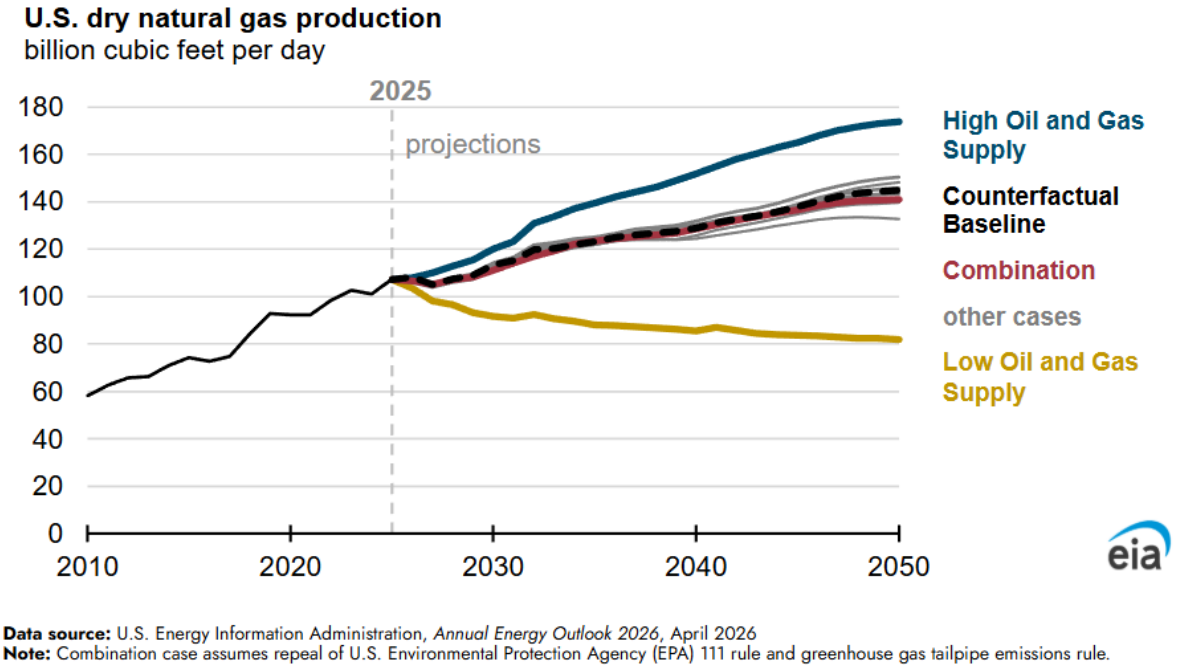

Figure 3 US Natural Gas Production

For western U.S. markets, these production trends imply increasing reliance on Permian and other western basin supplies to meet growing power burn, industrial demand, and export linked calls on gas. As more Permian gas moves east and south toward LNG and petrochemical hubs, western states will need to balance in region Rockies output, imports from Canada, and competition for Permian molecules, with infrastructure build out and price spreads determining how much of the new supply actually clears into West Coast and desert Southwest hubs. From a trading and risk perspective, the interaction between Permian associated gas growth, periodic capacity bottlenecks, and seasonal western demand will remain a central factor in basis behavior and volatility across western U.S. hubs.

Specifically in the case of PNM, rising Permian and New Mexico gas production generally improves physical supply security but does not eliminate exposure to regional basis and price shocks. New Mexico is now the third largest U.S. gas producer with about 8% of national output and Permian side growth in the state, plus Texas, provides ample molecules that can flow toward the Four Corners/San Juan interfaces and into the desert Southwest. That backdrop lowers long run scarcity risk but increases dependence on how well pipeline projects and interconnections keep up with supply and demand shifts across the West.

In the near term, congestion at Waha and along key westbound and northbound routes means PNM remains moderately exposed to volatility in regional gas prices even if the basin is in a long physical supply position. Episodes of negative or very weak Waha

pricing contrast sharply with potential spikes at downstream Southwest and Rockies hubs when weather, outages, or maintenance bind capacity, creating sizable basis moves that can flow through to PNM's delivered gas cost for generation. Future projects like the proposed Transwestern Desert Southwest expansion (Texas–New Mexico–Arizona) aim to add about 1.5 Bcf/d of capacity by around 2029 which would improve PNM adjacent routing options but also tighten the link between PNM's region and Permian dynamics. In conclusion, natural gas supply is adequate and will not be a major diver of price volatility over the long term.

Weather analysis

Weather can impact natural gas price volatility in the U.S. Southwest primarily by driving power sector demand. Extended hot spells across Texas, New Mexico, Arizona, and Southern California push cooling loads higher and force gas fired generators to ramp, especially when solar output fades in late afternoon and evening peaks. In recent years, summer power burn has reached record levels over 50–60 Bcf/d nationally, and the Southwest tends to experience heat waves earlier in the cooling season often extending into the post summer shoulder season, so early or extreme heat waves can quickly tighten regional balances and lift hub prices and basis. Conversely, milder than expected shoulder season weather depresses power burn and keeps more gas in storage, softening prices relative to pre-season expectations.

Cold outbreaks also create volatility by increasing demand and disrupting production in adjacent regions across the Southwest. Arctic blasts and winter storms have at times cut Permian and other Lower 48 production by several Bcf/d, with events like Winter Storm Uri and subsequent cold snaps knocking 5–10+ Bcf/d offline at times as un winterized wells, gathering systems, and plants froze. When those storms extend into West Texas and the Four Corners region, the Southwest can see both reduced inflows and elevated heating and power demand, impacting basis prices at regional hubs and driving short duration intraday price spikes.

Hydrology and renewables further modulate weather driven volatility in the Southwest. Strong hydro years and high solar output in the broader Western Interconnect can displace some gas fired generation during mild periods, capping prices, whereas drought conditions or cloudy, low wind situations create increased reliance on gas just as temperatures deviate from normal. As renewable penetration grows, the system becomes more sensitive to extreme temperature days when wind or solar underperform, making weather shocks translate more directly into swings in Southwest gas burn, storage trajectories, and spot price volatility.

These weather factors were evaluated in the analysis completed based on Platt's *Gas Daily* Daily (GDD) price history that was used to complete the modelling and calculate volatility. Additionally, we evaluated the price history to identify the frequency, duration and cost impact of short duration basis market disruptions. Extreme weather events will continue to occur and may increase in frequency and intensity; however, we do not believe they create a material long term risk and can be mitigated cost effectively.

Inflation analysis

During one of the PNM facilitated stakeholder conference calls, Third Act asked if inflation impacts would be addressed during the study. This is an entirely valid inquiry given the recent volatility in the monthly Producer Price Index (PPI) and Consumer Price Index (CPI) values as reported by the BLS history. The question was initially addressed during the Siemens presentation outlining the analytical approach that would be used to complete the gas volatility study. The initial response based on anecdotal price history was that gas prices and inflation are not correlated. Siemens also confirmed that inflation would be evaluated using a rigorous analytical approach and the results of that analysis would be included as part of the volatility analysis report.

To assess whether Henry Hub natural gas prices move with the general CPI price level, Siemens performed an Ordinary Least Squares (OLS) regression analysis using monthly Henry Hub spot prices and headline CPI data from January 1997 onward. OLS regression is a statistical method used to model the relationship between a continuous dependent variable and one or more independent variables. It determines the "line of best fit" (red line) by minimizing the sum of the squared differences (residuals) between the actual observed values and those predicted by the linear equation. In basic terms, the OLS regression looks for a mathematical relationship between an independent value (inflation) and a dependent value (natural gas prices). This mathematical relationship is reflected by the red line in the sample graph below. If the data point plots (blue dots) are tightly grouped around the redline, it indicates a strong correlation.

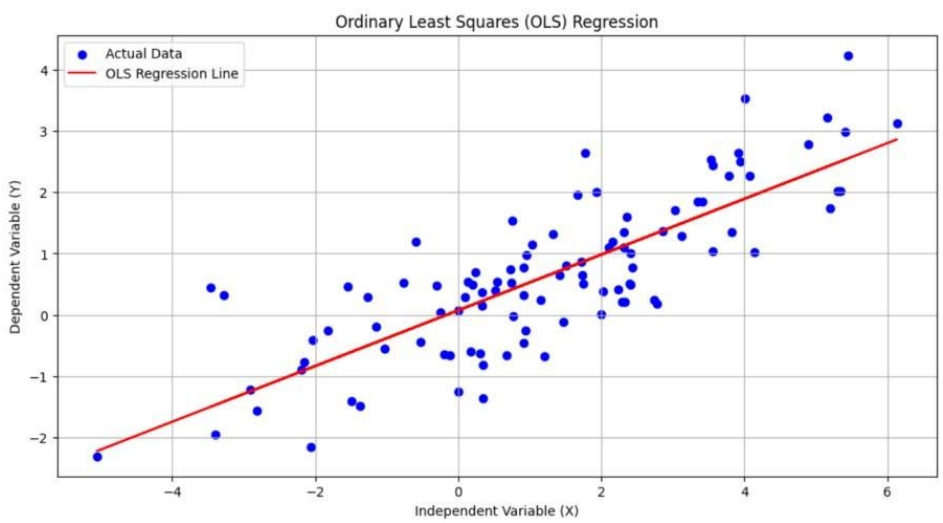

Figure 4 OLS Output Example

To conduct the analysis both variables (CPI and natural gas prices) were transformed into natural logs. The first regression tested whether log gas prices showed a long-term time trend. The time-trend model produced a small but statistically significant relevant output, suggesting a slight downward trend over the sample period. However, the model had a very low R^2, indicating although we do see a slight relationship between time and price; time explains only a small portion of the variation in gas prices.

The second step in the analysis was testing whether log gas prices moved in tandem with CPI. That analysis with log CPI produced a statistically significant but negative

coefficient that can be interpreted as elasticity; a 1% increase in CPI was associated with an estimated 0.28% decrease in Henry Hub prices over the sample. However, the model fit (distance between blue data dots and the red line) was even weaker, indicating that CPI explains very little of the movement in gas prices. Overall, the results suggest that Henry Hub prices do not behave like a stable inflation-linked commodity and are likely driven more by market-specific factors such as weather, storage levels, supply-demand conditions, and energy market shocks.

Infrastructure analysis

Several gas pipeline projects are proposed or advancing in New Mexico, ranging from large interstate expansions out of the Permian Basin to short laterals for specific loads within New Mexico. While the laterals will have a limited impact on price volatility other than creating additional load, the interstate projects will increase capacity to bring Permian gas into the PNM service territory helping to reduce price volatility. Given that pipelines are subject to multiple regulatory agencies at the Federal and State level, construction is always subject to delay.

The following is a list of major projects planned for the New Mexico market

- Energy Transfer is developing the Desert Southwest pipeline, an addition to and expansion of the Transwestern pipeline system. The new system will consist of approximately 516 miles of 42-inch pipe plus nine compressor stations across Texas, New Mexico, and Arizona. Design capacity around 1.5 Bcf/d to move Permian gas to growing Southwest demand (utilities, data centers, high-tech load), with in-service targeted for Q4 2029. Positioned as a $5.3 billion project leveraging the existing Transwestern system. The proposed pipeline pathway will pass through the southern portions of PNM's service territory in the Cliff Silver City region with delivery locations planned for Doña Ana County and Luna counties. The project sold all 1.5 Bcf/d of the initial capacity under 25-year contracts with investment-grade counterparties. Since the initial open season, Energy Transfer has received considerable interest above planned capacity and is considering expansion options.

- Western States and Tribal Nations (WSTN) have developed a proposed Southwest Pathway concept to bring Rockies gas down into New Mexico to serve growing regional demand as well as move gas to LNG facilities in Mexico creating greater access to Asian markets with requiring transit of the Panama Canal reducing shipping times by 50%. Unlike the Desert Southwest pipeline, this project is conceptual at this point and likely will be several years in development prior to construction; however, it shifts the supply source from the Permian basin to the Rocky Mountains potentially offsetting some degree of basis risk.

  New Mexico is part of a multistate roadmap (with Wyoming, Utah, tribal partners) proposing routes to move Rockies gas to western U.S. markets and Asian export paths. Options include building new pipe paralleling Transwestern and Public

Service of New Mexico ROWs, potentially tying into expansions like Desert Southwest and other proposed lines toward Phoenix and El Paso.

Energy Transfer has proposed developing a 17-mile gas pipeline (Green Chile) in southern New Mexico to serve “Project Jupiter,” a controversial data center load near Las Cruces. Filed with FERC in Feb 2026; the project is currently in the approvals queue having been denied an easement by NM Land Commission forcing a re-route of the pipeline. Sierra Club Rio Grande and other environmental groups filed a formal protest at FERC demanding a full environmental review of both the pipeline and the powerplant. The original start date of April 16th has slipped and there is no new in-service date until the FERC issues are resolved. While laterals are generally not major contributors to price volatility, this project is designed for up to ~400,000 Dth/d, mostly across BLM and private land, but is facing opposition from some state legislators and environmental groups concerned about air quality and permitting speed. Put in perspective, 400,000 Dth/d is enough natural gas to fuel four (4) 500 mw combined cycle plants dispatching as base load units. At issue is the speed at which permitting is proceeding as a precedent for additional mid volume interconnects for additional data center generation load.

These New Mexico-linked projects sit alongside a broader wave of Permian takeaway additions (e.g., other pipelines into Texas and to Mexico), which the EIA notes could add significant capacity between 2025–2029. The net effect is more optionality to move Permian gas westward and into regional power and data-center loads, with associated siting and environmental risk around projects like Green Chile. Our conclusion is that new pipeline builds will increase operation flexibility to bring gas into the PNM service territory and decrease spot gas price volatility

LNG Exports

U.S. LNG exports have grown rapidly over the past decade, turning the country into one of the world’s largest LNG suppliers. Growth has been driven by abundant shale gas (especially from the Permian, Haynesville, and Marcellus), relatively low domestic prices, and heavy investment in Gulf Coast liquefaction capacity. Export volumes are concentrated at a handful of large terminals, with most cargoes destined for Europe and Asia under a mix of long-term contracts and spot sales. Policy decisions, permitting timelines, and global demand cycles now play a major role in shaping forward U.S. gas balances.

The expansion of U.S. LNG exports has significant implications for domestic gas prices and regional basis. As more liquefaction capacity comes online, Gulf Coast and associated upstream hubs (Henry Hub, Houston Ship Channel, Waha, Haynesville-linked points) become increasingly tied to global LNG netbacks. In tight global markets, strong LNG demand can pull U.S. prices higher; in oversupplied conditions, U.S. liquefaction plants may run at lower utilization, easing pressure on domestic prices. This linkage also raises the importance of pipeline infrastructure connecting producing basins to export terminals.

LNG exports also carry geopolitical and energy-security implications. For allies in Europe and parts of Asia, U.S. cargoes provide diversification away from more politically exposed pipeline supplies and single-supplier LNG dependence. At the same time, U.S. export policy, environmental scrutiny over new projects, and community impacts along the Gulf Coast have become more prominent in permitting debates. Over the medium term, the balance between adding new LNG trains and meeting domestic decarbonization and affordability goals will shape both the scale and pattern of U.S. LNG exports.

Exports averaged on the order of 14–15 Bcf/d in 2025 and are projected to climb further as new Gulf Coast capacity ramps through 2026–2027. Government and industry estimates put operating U.S. LNG export capacity near 18 Bcf/d in mid-2026, with another roughly 15 Bcf/d under construction, implying a potential doubling of effective capacity over the next several years as projects like Plaquemines, Golden Pass, Port Arthur, and Corpus Christi Stage 3 move toward full service. Forward analyses suggest that incremental LNG feedgas demand in 2026 alone could add roughly 6–8 Bcf/d of call on U.S. gas versus today as this next wave comes online and ramps up. With 2027 export volume estimated to be 18.1 Bcf/d.

For U.S. gas markets, this LNG growth wave tightens the link between Henry Hub and global LNG netbacks and puts a premium on Gulf Coast and feedgas-adjacent basis. As new trains ramp, feedgas demand can rise by mid-single-digit Bcf/d chunks, absorbing surplus production from basins like the Permian and Haynesville and potentially flattening or lifting domestic price curves, especially in winter or during global disruptions such as outages in competing export regions. At the same time, pipeline delays or bottlenecks into liquefaction sites remain a risk factor, with EIA flagging that most new liquefaction capacity is Gulf-centric and contingent on synchronized midstream build-out.

Key upcoming LNG projects after 2026 are dominated by U.S. Gulf Coast expansions plus a handful of floating and modular concepts that could add a sizeable new wave of liquefaction capacity late in the decade. Many are already approved by FERC but not yet built, while others (like certain Plaquemines and Port Arthur phases) are in various stages between pre-FID and early construction. Together, these projects could add well over 10 Bcf/d of additional U.S. capacity post-2026 if they all proceed, with timing and volume governed by global demand, contract coverage, and financing conditions.

Beyond individual terminals, the post-2026 period is characterized by a broader “second wave” of LNG capacity globally, including Qatar’s additional North Field East/West trains, projects in Canada, Africa, and Russia, and Asia-Pacific expansions. Analyses of this wave highlight that while 2026–2027 are pivotal startup years for currently-under-construction U.S. plants, much of the incremental capacity that truly reshapes balances will arrive closer to 2028–2032 as these new U.S. phases and competing global projects ramp. This timing matters for U.S. gas markets because it affects when the next “step change” in LNG feedgas demand hits basins like Permian and Haynesville after the mid-decade build-out.

From a risk and strategy angle, these post-2026 projects set the stage for a possible second tightening in U.S. balances late in the decade, following the initial 2026–2027 ramp. If most of the listed U.S. expansions reach final investment decision (FID) and execute on time, U.S. LNG capacity by early-2030s could be more than double mid-2020s levels, deepening the linkage between Henry Hub and global LNG netbacks and keeping Gulf Coast basis structurally supported, but also increasing sensitivity to global overbuild and cyclical LNG price swings. This may put upward pressure on prices in the PNM service territory but should not impact price volatility in a meaningful way.

Data center/ load growth; impact on gas price volatility

The New Mexico Consumer Protection Alliance inquired about the impact of data center load growth and the resulting impact on natural gas price volatility. This is a valid concern as data center development in New Mexico has accelerated over the past few years, transforming the state from a secondary market into an emerging hub for hyperscale and AI-focused infrastructure. Meta's multibillion-dollar campus in Los Lunas, now expanding with dedicated AI and machine-learning buildings, exemplifies this trend and has helped anchor a broader ecosystem of facilities around Albuquerque and central New Mexico. New projects such as large campuses planned by New Era Energy, Zenith Volts, and others could, if built, make New Mexico one of the most significant data center geographies in North America by total capacity.

This growth is driven by several structural advantages and policy signals. New Mexico offers abundant, relatively affordable land, access to high-capacity transmission corridors, and proximity to major renewable energy developments such as the SunZia Wind project, which is adding thousands of megawatts of new capacity in the region. The state's Energy Transition Act aligns well with hyperscale operators' decarbonization commitments and supports long-term renewable procurement strategies for data center loads.

Longer-run, the impact on PNM's supply mix and rate trajectory depends heavily on how projects are structured. If big campuses act as "anchor customers" that sign long-term renewable PPAs, pay green premiums, and co-fund transmission and storage, they can help de-risk new carbon-free build-out and spread fixed grid costs over more kilowatt-hours, moderating or even offsetting bill impacts for other customers. Policy debates now underway in New Mexico regarding regulating data-center microgrids, setting fair cost-allocation rules, and shaping PNM's 2026 IRP will be critical in determining the impact of data-center growth. Given the data center developers preference for renewably sourced power, regulatory constraints on grid interconnections and prudent resource planning; data center load growth may drive an increased demand for gas fired generation but due to the 24/7 baseload nature of data center load, that demand will likely be served under long term gas purchase agreements backed with transportation capacity that will not create a significant demand for incremental spot priced gas thereby negating the daily gas price volatility risk.

Fundamental analysis conclusions

PNM plans to meet future electric demand by transitioning to a carbon-free portfolio built around large additions of renewable energy, storage, and flexible thermal resources that can ultimately burn clean fuels like hydrogen. Under the 2023 Integrated Resource Plan and subsequent planning updates, coal exits entirely by 2032, nuclear from Palo Verde remains a key carbon-free baseload component, and new solar, wind, and battery storage provide most incremental energy and capacity. To maintain reliability as renewable penetration rises, PNM's "All Technologies" planning scenario includes new combustion turbine-type units that start on natural gas but are designed to convert to hydrogen as PNM progresses to a carbon free portfolio.

While this increase in thermal generation is significant, fundamental analysis indicates that short term basis disruptions will continue to occur however the market will be able to supply this generation with minimal long term volatility impact.

Quantitative Analysis

Translating volatility into IRP scenarios and metrics

For an integrated resource plan, the statistical volatility model is a means to an end: it supplies a distribution of future gas prices used to stress test resource portfolios, not an end in itself. A common approach is to use forward curves as a baseline expectation and then layer on stochastic shocks calibrated from a Monte Carlo simulation model to generate multiple fuel price paths that preserve observed volatility and mean reversion. These paths can then be fed into gas supply forecasts to evaluate how the proposed portfolio will perform in terms of expected cost, cost variance, and downside risk (e.g., high price percentile metrics).

Volatility characteristics and modeling framework

Natural gas prices exhibit volatility clustering, heavy tails, and strong seasonality, with winter and extreme weather events driving many of the largest moves. Empirical studies and EIA analysis show that annualized volatility for Henry Hub can range from roughly 20–30 percent in benign periods to 70–80 percent or more during stress episodes, and that gas volatility is typically higher and more erratic than oil volatility. Volatility also varies by tenor: front month futures display higher conditional variance than longer dated contracts, which is relevant when IRPs use different horizons for near term dispatch versus long term planning.

Quantitative analytical framework

For the quantitative analysis of the natural gas exposure, a model was created which simulates gas markets and quantifies the possible gas exposure of PNM to the

unpredictable nature of Henry Hub and the basis markets. The methodology consists of a stochastic simulation for gas prices with Monte Carlo integration to create confidence intervals of gas prices starting with the prompt month through the end of 2045.

To estimate the impact of natural gas spot price volatility Siemens used a 6-step approach as outlined below:

1. Analyze historical spot pricing data to calculate volatility including short duration market disruptions that create pricing anomalies
2. Apply this volatility to the forward curve via Monte Carlo simulation
3. Generate thousands of potential price paths
4. Organize these paths into standard deviation bands around the forward curve
5. Apply these paths to forecasted monthly gas consumption (from IRP dispatch) to quantify cost exposure
6. Estimate the variance between expected and unfavorable outcomes to assess risk potentially passed on to ratepayers

To create the price paths, Siemens used 3.5 years of historical market prices for both Henry Hub as well as the local basis markets. The three-and-a-half-year period was selected to provide a reasonable amount of history to be statistically valid without capturing history that predates infrastructure and structural market changes that impact price.

Prices were simulated considering historical volatility, correlation between hubs and mean reverting prices. The prices listed in the table below were used as the starting point for simulations. These prices represent the range of expected prices over the future starting with a low price in the 5th percentile indicating all but 5% of prices will be above that price increasing to the 95th percentile which indicates a price point at which 95% of prices will be at or below that level. These prices are used to bound the simulations. Using a blend of the potential range of prices Siemens conducted a market simulation to estimate the future cost of natural gas and its impact on PNM's annual gas expense based on the expected volume requirement provided by PNM.

Percentile	Platts Waha	Platts Houston Ship Channel	El Paso Permian	El Paso San Juan	Platts Henry Hub
95%	$ 2.21	$ 3.34	$ 2.28	$ 4.04	$ 3.82
75%	$ 2.13	$ 3.31	$ 2.19	$ 3.90	$ 3.77
50%	$ 2.06	$ 3.28	$ 2.12	$ 3.81	$ 3.74
25%	$ 2.01	$ 3.25	$ 2.07	$ 3.71	$ 3.71
5%	$ 1.93	$ 3.21	$ 1.99	$ 3.52	$ 3.66

Table 1 Basis market simulation constraints

The following table utilizes the price distributions shown above to quantify the potential impact of forward-looking price over the planning horizon. The expected cost is based on the P50 scenario while the unfavorable case is based on the P95 price scenario. The P50 case is the expected case or 50% probability of occurrence event. P95 is the high market case, or the unfavorable event. The difference between the two cases is the “at risk” number; the difference between expected and unfavorable case, assuming no hedging.

Year	Volume (millions)	Unit Cost P50 ($)	Total Cost P50 ($ millions)	Unit Cost P95 ($)	Total Cost P95 ($ millions)	At risk spread ($ millions)
2026	26.5	2.93	77.6	3.43	91.0	13.3
2027	31.8	3.85	122.1	4.74	150.6	28.5
2028	30.6	3.87	118.4	4.86	148.4	30.0
2029	32.9	3.77	124.0	4.71	154.9	30.9
2030	37.7	3.83	144.6	4.67	175.9	31.4
2031	45.2	3.78	170.7	4.62	209.0	38.3
2032	32.8	3.87	127.2	4.70	154.4	27.1
2033	32.8	3.79	124.2	4.74	155.4	31.2
2034	33.4	3.91	130.7	4.69	156.7	26.0
2035	34.0	3.87	131.4	4.99	169.3	37.9
2036	33.8	3.82	129.3	5.02	170.0	40.7
2037	33.7	3.85	129.8	5.13	172.7	42.9
2038	34.0	3.83	130.3	4.91	166.9	36.7
2039	34.0	3.76	127.9	4.70	160.1	32.2
2040	34.5	4.03	139.0	4.94	170.3	31.3
2041	33.1	3.87	128.1	4.77	157.9	29.8
2042	34.2	3.73	127.6	5.07	173.3	45.7
2043	33.2	3.84	127.5	4.70	156.1	28.7
2044	27.9	3.82	106.6	4.78	133.5	26.8
2045	2.6	3.64	9.5	4.37	11.4	1.9

Table 2 Annual gas cost variances

Short term basis analysis

As mentioned in the fundamental analysis section, short-term disruptions will continue to occur due to four primary factors:

- Pipeline constraints or outages that prevent gas from moving from a surplus region to a demand center (capacity limits, maintenance, explosions, force majeure).
- Extreme weather that simultaneously spikes local demand and disrupts production or transportation (polar vortex, hurricanes, deep freeze-offs).
- Low regional storage levels or loss of storage flexibility, which tighten local balances and amplify price response to any shock.
- Sudden shifts in regional supply–demand from structural changes or global/geopolitical events that change flows and competition for gas supply.

As reflected in the graph below, El Paso San Juan experiences some short duration basis events that could cause significant increases in natural gas expense if not appropriately mitigated.

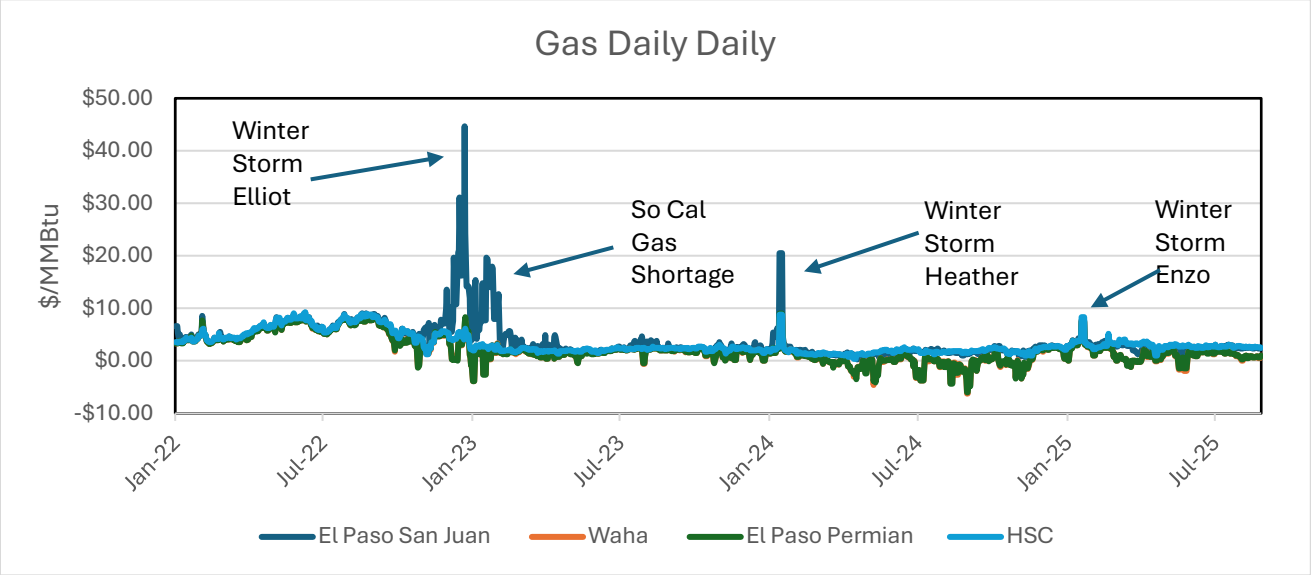

Figure 5 Natural gas spot price history

To quantify the potential impact of these basis market anomalies Siemens considered three and a half years of spot price history and identified 6 events, totaling 47 days, ranging from 1 day in duration to 20 days in December of 2022. The events selected were based on days when gas basis differentials were two standard deviations above the mean. Siemens assumed that the average daily volume during an event increased by 20% over forecast and then applied the historical basis differential that occurred during the event to the increased volume to quantify the financial impact.

Over the 3 ½ year analysis time frame, the cost implication was slightly under $10.4 mm with the majority concentrated in the December and January period in 2022/2023. Assuming the pattern were to repeat, on an average annual load of 30 Bcf the potential impact would be $0.30 to $0.33/MMBtu, assuming no basis hedging is in place. The vast majority of that risk occurs in the near term current and prompt month markets where the PNM risk management program allows for up to an 85% hedge ratio. An 85% hedge ratio would reduce the $10.5 mm exposure to $1.6 mm or approximately 2%-4% of the expected p50 annual gas cost. When evaluating basis risk in the Western US markets it is critical to remember that basis can swing in both directions and there may be situations where due to pipeline constraints PNM could experience negative basis and be paid to take gas.

Risk Mitigation

Natural gas price volatility does create risk for PNM ratepayers. Markets in the Southwest, particularly the Permian and San Juan basins can be volatile as discussed earlier in this report. Using risk management tools readily available in the physical and

financial energy markets can reduce those risks to an acceptable level. PNM has a functional commodity price risk management program in place that was approved for hedging through 2028 by the New Mexico Public Regulation Commission under Docket No. 24-00238-UT. The plan, as approved, authorizes PNM to hedge forward energy requirements using physical and financial instruments. It is important to note that volatility in the basis markets can be both favorable and unfavorable therefore PNM limits the volumes for gas hedging to a reasonable level except during the current and prompt month when PNM is most exposed to unfavorable price swings. The guidelines apply to the amount of energy required to meet jurisdictional loads projected for the forward planning period, subject to the condition that PNM will hedge no more than 30% of projected annual gas supply required to fuel the gas fired generation fleet, with the exception of the prompt month, where up to 85% of the projected month's energy requirement may be hedged. The plan further allows the current year energy requirement to be hedged to 70%, 1st calendar year out to be hedged to 60%, and the 2nd calendar year to be hedged to 40%. These longer-term energy hedges reduce volumetric exposure on gas fired generation. When coupled with the near-term natural gas hedges will substantially reduce PNM's exposure to both short- and long-term natural gas prices spikes.

In addition to the risk reduction achieved through fuel hedging, PNM's targeted timeline for compliance with the ETA will, by default, reduce exposure to fuel price swings by structurally shifting the supply mix away from fuel-dependent generation toward renewables and other carbon free resources. As PNM moves toward meeting the ETA's renewable and carbon free standards, the goal is to develop a carbon free portfolio as soon as possible. Accordingly, as PNM adjusts its resource base to accomplish these objectives, its marginal energy needs will increasingly come from wind, solar, and other resources with no commodity fuel cost, rather than increasing reliance on gas-fired units whose dispatch costs are directly tied to natural gas prices. This transition means a growing share of PNM's cost of service is driven by fixed-capital and contracted capacity costs instead of pass-through fuel costs, dampening the impact of short-term gas price spikes on retail rates. In practical terms, each incremental megawatt-hour served from long-lived renewable assets under ETA compliance displaces prospective gas-fired generation, narrowing PNM's "open" natural gas requirement and thereby reducing the volume of gas that must be procured at floating market prices, which in turn lowers the utility's cash-flow and revenue requirement sensitivity to natural gas price shocks over time.

Conclusions

The quantitative and fundamental analyses presented in this study indicate that fuel cost variability associated with natural gas price volatility, while non-trivial, is bounded and can be prudently managed within the context of PNM's long-term resource planning framework. Long-horizon simulations calibrated to observed market behavior suggest that annual average gas cost outcomes are expected to remain within an approximate range of $0.14 to $1.09 per MMBtu around the forward curve, even after explicitly incorporating stochastic shocks and basis dynamics into the modeling construct. This per unit variance equated to a $26-to-$46 million-dollar annual variance as reflected in

Figure 6 spread across 5000+ GWh of generation. Coupled with basis risk in the $10.8 million dollar range, this is not an insignificant amount of exposure. It is important to remember; these risk numbers do not include the impact of the risk reduction of the hedging program discussed previously. When viewed against total portfolio fuel costs and the broader IRP time frame, this level of variance is material for planning and risk-allocation purposes but does not rise to the level of a structural threat to overall rate stability, provided that it is explicitly recognized and addressed through ongoing risk management practices.

At the same time, the historical basis assessment confirms that short-duration, high-magnitude disruptions—such as the six identified events totaling 47 days over the observed period—can create concentrated cost impacts if left unmanaged; in PNM's case, the back-cast estimate of roughly $0.30 to $0.33 per MMBtu on an annual load of 30 Bcf illustrates the potential rate effect of unhedged exposure to such episodes. However, these disruptions are episodic rather than chronic and occur within a broader market context characterized by robust domestic supply growth, ongoing interstate pipeline expansions, and increasing routing optionality into the desert Southwest. When combined with the established commodity risk-management program, structured procurement, and storage and capacity rights, these market fundamentals support the conclusion that both long-dated volatility and short-term basis risk can be reduced to levels consistent with a reasonable balance of affordability, reliability, and prudence for retail customers.

Accordingly, the conclusions developed in this analysis support a finding that PNM's treatment of gas price risk within its Integrated Resource Plan is reasonable and consistent with sound utility practice, in that it relies on empirically grounded stochastic methods, incorporates both qualitative and quantitative assessments of key drivers, and translates resulting cost distributions into actionable planning metrics. The Company's strategy—anchored in portfolio diversification, flexible thermal resources capable of transitioning to lower-carbon fuels, and the selective use of financial and physical hedging instruments—provides a credible path to maintaining cost variability within tolerable bounds over the 20-year horizon while continuing to meet statutory decarbonization and reliability objectives. On this basis, it is reasonable to conclude that fuel price risk to ratepayers is bounded and mitigated to align with Commission's expectations for prudent risk management. No additional modifications to the Company's gas price volatility assumptions or risk management practices are warranted at this time.

Appendix K: Cost and Performance Data for New Resource Options

Toward the end of 2025, PNM contracted the Electric Power Research Institute (EPRI) to develop cost and performance assumptions for supply-side candidate resources. These assumptions included capital costs (2026$/kW), fixed O&M costs (2026$/kW-yr), variable O&M costs (2026$/MWh), forced outage rates (%), heat rates (Btu/kWh), CO_2 emission rates (lb/MWh), and water usage rates (lb/MWh), among other resource characteristics. Future cost projections were developed by applying technology-specific cost trajectories informed by NREL's 2024 Annual Technology Baseline (ATB) and consultant-provided information. This approach preserves the relative cost trends reflected in the ATB while anchoring future projections to EPRI-developed base-year assumptions. This appendix summarizes the assumptions used to characterize the new supply-side resource options evaluated in the IRP. Contents include:

- Characteristics of New Candidate Supply-Side and Demand-Side Resources (Table K-1);
- Capital Cost Assumptions for Candidate Resources by Year (Table K-2);
- Fixed O&M Cost Assumptions for Candidate Resources by Year (Table K-3);
- Variable O&M Cost Assumptions for Candidate Resources by Year (Table K-4);
- Characteristics of the energy efficiency bundles considered in the IRP (Table K-5);
- Costs of the demand response potential programs considered in the IRP (Table K-6);
- Summer Capacity of the Demand Response Potential Programs Considered in the IRP (Table K-7); and
- Summer Capacity of the Demand Response Potential Programs Considered in the IRP (Table K-8)

TABLE K-1 CHARACTERISTICS OF NEW CANDIDATE SUPPLY-SIDE AND DEMAND-SIDE RESOURCES

Technology	First Year Available	Modeled Capacity (MW)	Life (Years)	Capital Cost ($/kW)	Fixed O&M ($/kW-yr)	Variable O&M ($/kW-yr)	Storage Duration (Hrs)	Heat Rate (Btu/kWh)	Round Trip Efficiency (%)	Forced Outage Rate (%)	Firm Capacity (%)	CO_2 Rate (lbs/MWh)	Water Usage (lb/MWh)
Generating/Storage Technology Resources													
Solar Photovoltaic[3]	2029	10	30	1,532	16	0	-	-	-	1	6.6	-	-
Wind[3]	2033	151	25	2,615	57	0	-	-	-	3	20.1	-	-
Battery Storage (4 hr)[3]	2029	10	20	1,724	15	0	4	-	87	8	96	-	-
Battery Storage (8 hr)[3]	2029	10	20	2,476	93	0	8	-	88.5	8	96	-	-
CAES[3]	2035	100	40	5,740	37	11	10	-	59.9	8	99.5	-	92
CT (heavy frame)[2,3]	2030	179	30	2,403	16	9	-	10,236	-	2	98	1,195.5	8
CT (aero)[2,3]	2030	40	30	3,563	37	7	-	9,449	-	2	98	1,103.5	44
Combined Cycle[2,3]	2031	582	30	2,924	20	5	-	6,762	-	2.5	92	6,762	535.4
Combined Cycle with CCS[2,3]	2031	499	30	5,978	36	6	-	7,765	-	2.5	92	43.7	535.4
Linear Generator[2,3]	2030	40	30	3,746	8	8	-	7,582	-	2	98	888.5	-
Geothermal[3]	2033	30	30	8,007	227	2	-	-	-	1.5	76	-	1,462
Enhanced	2033	30	30	10,329	227	2	-	-	-	1.5	76	-	1,462
Iron Air Energy	2029	100	30	4,144	22	0	100	-	38	4	92	-	37
Pumped Hydro[3]	2034	100	50	4,220	40	0	24	-	80	5	95	-	2,755
SMR[3]	2035	146	30	8,263	140	12	-	10,900	-	1.4	98.6	-	19.1
Demand Side Management Candidate Resources													
Energy Efficiency	2031	5-26	13-18	-	-	25-284	-	-	-	-	50	-	-
Peak Saver Extension	2030	30	15	-	387	0	-	-	-	-	63	-	-
Power Saver	2030	40	15	-	563	0	-	-	-	-	63	-	-
Grid Interactive WH[4]	2030	0.006	10	-	1	0	-	-	-	-	63	-	-
Water Heater DLC[4]	2030	1.12	10	-	183	0	-	-	-	-	63	-	-
Battery Storage DLC[4]	2030	0.1	15	-	4	0	-	-	-	-	63	-	-
Electric Vehicle DCM[4]	2030	0.76	10	-	75	0	-	-	-	-	63	-	-
Time-of-Day Rate	2030	1.19	10	-	64	0	-	-	-	-	63	-	-
EV Time-of-Day Rate[4]	2030	0.56	10	-	24	0	-	-	-	-	63	-	-
Behavioral	2030	2	10	-	41	0	-	-	-	-	63	-	-

Notes

1. Vampiric losses (storage loss rate) of .03%/Hour was applied to the iron air energy storage candidate resource
2. Emissions rates shown for new thermal generators correspond to operations using natural gas; no emissions attributed to plant output when operated using hydrogen fuel starting in 2045
3. First-year availability was based on information provided by EPRI, and includes the time required for construction, RFP evaluation, contract negotiations, and other regulatory processes
4. WH = Water Heater; DLC = Direct Load Control; DCM = Direct Charge Management; EV = Electric Vehicle

TABLE K-2 CAPITAL COST ASSUMPTIONS FOR CANDIDATE RESOURCES BY YEAR (NOMINAL, $/KW)

Technology[1]	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
	$/kW																			
Solar - Photovoltaic	1,477	1,495	1,514	1,532	1,551	1,571	1,590	1,610	1,630	1,650	1,671	1,692	1,713	1,734	1,755	1,777	1,799	1,822	1,844	1,867
Wind	2,306	2,348	2,391	2,434	2,478	2,523	2,569	2,615	2,663	2,711	2,760	2,810	2,861	2,913	2,966	3,020	3,075	3,131	3,187	3,245
Battery Storage (4 hr)	1,661	1,682	1,702	1,724	1,745	1,767	1,789	1,811	1,834	1,856	1,879	1,903	1,926	1,950	1,975	1,999	2,024	2,049	2,075	2,101
Battery Storage (8 hr)	2,386	2,416	2,446	2,476	2,507	2,538	2,570	2,602	2,634	2,667	2,700	2,734	2,768	2,802	2,837	2,872	2,908	2,944	2,981	3,018
CAES	4,056	4,536	4,513	4,879	5,070	5,264	5,379	5,497	5,618	5,740	5,865	5,992	6,122	6,254	6,388	6,524	6,663	6,805	6,949	7,096
CT (heavy frame)	1,922	2,150	2,139	2,312	2,403	2,494	2,549	2,605	2,662	2,720	2,779	2,840	2,901	2,963	3,027	3,092	3,158	3,225	3,293	3,363
CT (aero)	2,850	3,188	3,172	3,429	3,563	3,699	3,780	3,863	3,948	4,034	4,122	4,211	4,302	4,395	4,489	4,585	4,683	4,782	4,883	4,987
Combined Cycle	2,451	2,649	2,433	2,570	2,762	2,924	3,004	3,085	3,139	3,193	3,249	3,306	3,364	3,423	3,482	3,543	3,605	3,668	3,733	3,798
Combined Cycle with CCS	5,011	5,416	4,973	5,254	5,647	5,978	6,141	6,307	6,417	6,529	6,642	6,759	6,877	6,997	7,119	7,244	7,371	7,500	7,631	7,765
Linear Generator	2,996	3,351	3,334	3,604	3,746	3,889	3,974	4,061	4,150	4,241	4,333	4,427	4,523	4,620	4,719	4,820	4,923	5,027	5,134	5,243
Geothermal	7,959	7,943	7,936	7,937	7,945	7,960	7,981	8,007	8,038	8,074	8,276	8,482	8,694	8,911	9,133	9,361	9,595	9,835	10,080	10,332
Enhanced Geothermal	13,407	12,649	12,048	11,563	11,165	10,835	10,560	10,329	10,133	9,969	10,217	10,472	10,734	11,002	11,276	11,557	11,846	12,142	12,445	12,755
Iron Air Energy Storage	3,993	4,043	4,093	4,144	4,196	4,248	4,301	4,354	4,408	4,463	4,519	4,575	4,632	4,689	4,748	4,807	4,866	4,927	4,988	5,050
Pumped Hydro	3,331	3,431	3,534	3,640	3,749	3,862	3,978	4,097	4,220	4,346	4,477	4,611	4,749	4,892	5,039	5,190	5,345	5,506	5,671	5,841
SMR[2]	-	-	-	-	-	-	-	-	-	8,263	8,130	7,981	7,816	7,634	7,434	7,510	7,584	7,655	7,724	7,790

Notes

1. Candidate technologies have different first-year availability assumptions in EnCompass. EnCompass model uses the cost of a resource in the year it is selected, which must be on or after the resource's first year of availability
2. The SMR candidate resource includes no data from 2026 through 2034 based on NREL's 2024 ATB, therefore no cost curve was able to be determined throughout that period.

TABLE K-3 FIXED O&M COST ASSUMPTIONS FOR CANDIDATE RESOURCES BY YEAR (NOMINAL, $/KW-YR)

Fixed O&M	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Solar - Photovoltaic	15	15	16	16	17	17	18	18	19	20	20	21	21	22	23	23	24	25	25	26
Wind	47	48	49	51	52	54	56	57	59	61	63	64	66	68	71	73	75	77	79	82
Battery Storage (4 hr.)	13	14	14	15	15	16	16	17	17	18	18	19	19	20	20	21	22	22	23	24
Battery Storage (8 hr.)	85	87	90	93	96	98	101	104	107	111	114	117	121	125	128	132	136	140	144	149
CAES	29	29	30	31	32	33	34	35	36	37	38	39	41	42	43	44	46	47	49	50
CT (heavy frame)	14	14	15	15	16	16	17	17	18	18	19	19	20	20	21	22	22	23	24	24
CT (aero)	33	34	35	36	37	38	39	40	41	43	44	45	47	48	49	51	52	54	56	57
Combined Cycle	18	18	19	19	20	20	21	22	22	23	24	24	25	26	26	27	28	29	30	31
Combined Cycle with CCS	31	33	34	35	36	37	38	39	40	41	43	44	45	47	48	49	51	52	54	56
Linear Generator	7	7	8	8	8	8	9	9	9	9	10	10	10	11	11	11	12	12	12	13
Geothermal	185	190	196	202	208	214	221	227	234	241	248	256	264	272	280	288	297	306	315	324
Enhanced Geothermal	184	190	196	201	208	214	220	227	234	241	248	255	263	271	279	287	296	305	314	323
Iron Air Energy Storage	20	21	21	22	23	23	24	25	25	26	27	28	29	29	30	31	32	33	34	35
Pumped Hydro	31	32	33	34	35	36	37	38	40	41	42	43	45	46	47	49	50	52	53	55
SMR	107	111	114	117	121	124	128	132	136	140	144	149	153	158	162	167	172	177	183	188

TABLE K-4 VARIABLE O&M COST ASSUMPTIONS FOR CANDIDATE RESOURCES BY YEAR (NOMINAL, $/KW-YR)

Variable O&M	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Solar - Photovoltaic	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Wind	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Battery Storage (4 hr.)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Battery Storage (8 hr.)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
CAES	8.3	8.6	8.8	9.1	9.4	9.7	9.9	10.2	10.6	10.9	11.2	11.5	11.9	12.2	12.6	13.0	13.4	13.8	14.2	14.6
CT (heavy frame)	7.6	7.9	8.1	8.3	8.6	8.8	9.1	9.4	9.7	10.0	10.3	10.6	10.9	11.2	11.5	11.9	12.2	12.6	13.0	13.4
CT (aero)	6.3	6.5	6.7	6.9	7.1	7.3	7.5	7.7	8.0	8.2	8.5	8.7	9.0	9.3	9.5	9.8	10.1	10.4	10.7	11.1
Combined Cycle	4.1	4.2	4.3	4.4	4.6	4.7	4.9	5.0	5.2	5.3	5.5	5.6	5.8	6.0	6.2	6.3	6.5	6.7	6.9	7.1
Combined Cycle with CCS	5.0	5.1	5.3	5.4	5.6	5.8	5.9	6.1	6.3	6.5	6.7	6.9	7.1	7.3	7.5	7.7	8.0	8.2	8.5	8.7
Linear Generator	7.3	7.5	7.7	7.9	8.2	8.4	8.7	8.9	9.2	9.5	9.8	10.0	10.4	10.7	11.0	11.3	11.7	12.0	12.4	12.7
Geothermal	1.5	1.5	1.5	1.6	1.6	1.7	1.7	1.8	1.8	1.9	2.0	2.0	2.1	2.1	2.2	2.3	2.3	2.4	2.5	2.6
Enhanced Geothermal	1.5	1.5	1.5	1.6	1.6	1.7	1.7	1.8	1.8	1.9	2.0	2.0	2.1	2.1	2.2	2.3	2.3	2.4	2.5	2.6
Iron Air Energy Storage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SMR	9.1	9.4	9.7	10.0	10.3	10.6	10.9	11.2	11.5	11.9	12.2	12.6	13.0	13.4	13.8	14.2	14.6	15.1	15.5	16.0

TABLE K-5 CHARACTERISTICS OF THE ENERGY EFFICIENCY BUNDLES CONSIDERED IN THE IRP

Annual Energy Savings (GWh)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Up to $50	0.6	0.6	0.5	0.5	0.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Over $50	19	19	18	17	16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Up to $75	-	-	-	-	-	50	52	52	52	51	52	51	51	51	52	42	42	42	43	43
$75 to $125	-	-	-	-	-	8	9	9	9	9	9	9	9	9	9	9	9	9	9	9
Over $125	-	-	-	-	-	26	26	26	26	27	27	27	27	27	27	27	26	27	23	22
Peak Reduction (MW)	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**2037**	**2038**	**2039**	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**
Up to $50	0.1	0.1	0.1	0.1	0.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Over $50	6	6	6	6	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Up to $75	-	-	-	-	-	20	20	21	21	20	19	19	19	20	20	18	17	18	19	19
$75 to $125	-	-	-	-	-	5	5	6	6	6	6	6	6	6	6	6	6	6	6	6
Over $125	-	-	-	-	-	23	23	23	23	24	24	25	25	26	26	26	25	25	21	21
Levelized Cost ($/MWh)	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**2037**	**2038**	**2039**	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**
Up to $50	41	41	43	43	43	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Over $50	211	212	209	258	276	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Up to $75	-	-	-	-	-	27	26	26	26	26	26	26	26	25	25	29	29	29	29	28
$75 to $125	-	-	-	-	-	108	108	108	108	108	108	108	108	108	108	108	108	108	108	108
Over $125	-	-	-	-	-	284	284	284	284	282	280	278	276	272	271	269	242	239	250	249
Average Life (Years)	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**2037**	**2038**	**2039**	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**
Up to $50	10	10	10	10	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Over $50	15	15	15	15	15		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Up to $75	-	-	-	-	-	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15
$75 to $125	-	-	-	-	-	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18
Over $125	-	-	-	-	-	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13

TABLE K-6 COSTS OF THE DEMAND RESPONSE POTENTIAL PROGRAMS CONSIDERED IN THE IRP

Total Program Cost ($000)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Battery Energy Storage DLC	-	-	-	-	55	96	185	172	169	150	157	164	173	183	192	197	208	219	231	239
Behavioral	-	-	-	-	378	585	737	755	777	800	824	848	873	898	924	951	979	1,008	1,037	1,068
Domestic Hot Water Heater DLC	-	-	-	-	1,691	2,429	3,521	2,603	2,196	2,192	2,270	2,343	2,413	2,484	2,556	2,627	2,692	2,762	2,862	2,921
Electric Vehicle Direct Charge Management	-	-	-	-	692	1,985	5,199	6,443	7,693	8,185	9,293	10,313	11,443	12,564	13,763	14,786	15,936	17,033	18,219	19,158
Electric Vehicle TOD Rate	-	-	-	-	223	554	1,212	816	594	334	305	255	224	187	156	116	92	70	69	62
Grid Interactive Water Heater	-	-	-	-	13	21	32	42	58	74	91	101	113	128	114	104	94	137	95	86
Peak Saver	3,843	3,477	3,558	3,557	5,376	5,442	5,514	5,591	5,677	5,771	5,877	5,988	6,109	6,244	6,396	6,556	6,730	6,920	7,128	7,345
Power Saver	6,787	7,050	7,393	7,574	7,815	8,119	8,433	8,760	9,100	9,452	9,818	10,198	10,591	10,998	11,416	11,841	12,288	12,719	13,178	13,662
Time of Day Rate	-	-	-	-	594	672	697	415	266	165	167	171	175	179	187	194	198	201	216	217

Table K-7 Summer Capacity of the Demand Response Potential Programs Considered in the IRP

Summer Potential (MW)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Battery Energy Storage DLC	-	-	-	-	0.1	0.3	0.8	1.1	1.3	1.3	1.4	1.4	1.5	1.5	1.6	1.6	1.7	1.7	1.8	1.8
Behavioral	-	-	-	-	2.1	3.4	4.2	4.2	4.2	4.2	4.2	4.2	4.2	4.2	4.2	4.2	4.2	4.2	4.3	4.3
Domestic Hot Water Heater DLC	-	-	-	-	1.1	2.2	3.3	3.8	3.9	3.8	3.7	3.6	3.5	3.4	3.3	3.3	3.2	3.1	3.1	3.0
Electric Vehicle Direct Charge Management	-	-	-	-	0.8	2.8	7.7	11.4	14.5	16.3	18.0	19.6	21.2	22.7	24.2	25.4	26.6	27.7	28.8	29.6
Electric Vehicle TOD Rate	-	-	-	-	0.6	1.9	4.9	6.8	8.0	8.6	9.1	9.5	9.8	10.0	10.2	10.2	10.2	10.2	10.2	10.1
Grid Interactive Water Heater	-	-	-	-	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.0
Peak Saver[1]	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30
Power Saver[1]	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40
Time of Day Rate	-	-	-	-	1.2	2.7	4.5	5.4	5.8	5.7	5.6	5.5	5.5	5.4	5.4	5.3	5.3	5.3	5.3	5.3

Notes

1. The Peak Saver and Power Saver demand response programs are assumed to remain at their current maximum potential, as defined in the 2027 Energy Efficiency and Load Management Triennial Plan, throughout the 2026 IRP study period. Because any changes to these programs require NMPRC approval through future energy efficiency triennial filings, no additional program expansion is assumed.

TABLE K-8 WINTER CAPACITY OF THE DEMAND RESPONSE POTENTIAL PROGRAMS CONSIDERED IN THE IRP

Winter Potential (MW)	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Battery Energy Storage DLC	-	-	-	-	0.1	0.3	0.8	1.1	1.3	1.3	1.4	1.4	1.5	1.5	1.6	1.7	1.7	1.8	1.8	1.9
Behavioral	-	-	-	-	1.5	2.3	2.8	2.8	2.7	2.7	2.7	2.6	2.6	2.6	2.6	2.5	2.5	2.5	2.5	2.4
Domestic Hot Water Heater DLC	-	-	-	-	1.5	2.8	4.2	4.8	5.0	4.9	4.8	4.7	4.7	4.6	4.5	4.5	4.4	4.4	4.3	4.2
Electric Vehicle Direct Charge Management	-	-	-	-	0.8	2.8	7.8	11.6	14.8	16.6	18.5	20.2	21.8	23.4	25.0	26.3	27.6	28.8	29.9	30.7
Electric Vehicle TOD Rate	-	-	-	-	0.6	2.0	5.0	6.9	8.2	8.8	9.4	9.8	10.1	10.4	10.5	10.6	10.7	10.7	10.7	10.6
Grid Interactive Water Heater	-	-	-	-	0.0	0.0	0.0	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.1	0.1
Peak Saver[1]	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30
Power Saver	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Time of Day Rate	-	-	-	-	0.4	0.9	1.6	1.9	2.0	1.9	1.9	1.9	1.8	1.8	1.8	1.8	1.8	1.7	1.7	1.7

Notes

1. The Peak Saver demand response program is assumed to remain at their current maximum potential, as defined in the 2027 Energy Efficiency and Load Management Triennial Plan, throughout the 2026 IRP study period. Because any changes to this program requires NMPRC approval through future energy efficiency triennial filings, no additional program expansion is assumed.

APPENDIX L: 2025 RESOURCE ADEQUACY ASSESSMENT: DESERT SOUTHWEST

This appendix provides the 2025 Resource Adequacy Assessment: Desert Southwest Final Report – May 2026.

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2025 Resource Adequacy Assessment: Desert Southwest

Final Report

May 2026

Energy+Environmental Economics

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Technical Advisory Group

Over the course of this study, E3 convened a Technical Advisory Group comprising individuals with expertise and interests in resource adequacy. These individuals graciously shared their time through several meetings, providing their feedback on the project's scope, technical analysis, and key findings. The Technical Advisory Group included the following individuals:

Genevieve de Mijolla, Electric Power Research Institute
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Rebecca Sexton, Western Power Pool
Derek Stenclik, Telos Energy

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Disclaimer

The study sponsors retained E3 to provide an independent assessment of the resource adequacy situation in the Desert Southwest region. The sponsors provided technical information and informed the development of study scenarios. E3 utilized data from the study sponsors and other sources to develop a Southwest resource adequacy model. E3 retained full editorial control over the report and is solely responsible for all contents.

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Acronym Definitions

Acronym	Definition
ACC	Arizona Corporation Commission
AEPCO	Arizona Electric Power Cooperative
APS	Arizona Public Service Company
BAA	Balancing Authority area
CAISO	California Independent System Operator
CEC	California Energy Commission
CPUC	California Public Utilities Commission
CRSP	Colorado River Storage Project
EIM	Energy Imbalance Market
ELCC	Effective Load Carrying Capability
EPE	El Paso Electric Company
ESIG	Energy Systems Integration Group
EUE	Expected Unserved Energy
FERC	Federal Energy Regulatory Commission
HILF	High Impact Low Frequency
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Plan
LOLE	Loss of Load Expectation
LOLP	Loss of Load Probability
NERC	North American Electric Reliability Corporation
NMPRC	New Mexico Public Regulation Commission
NREL	National Renewable Energy Laboratory
NWPP	Northwest Power Pool
PNM	Public Service Company of New Mexico
RECAP	Renewable Energy Capacity Planning Model
SRP	Salt River Project
TEP	Tucson Electric Power
WAPA	Western Area Power Administration
WECC	Western Electricity Coordinating Council
WRAP	Western Resource Adequacy Program

1. Executive Summary

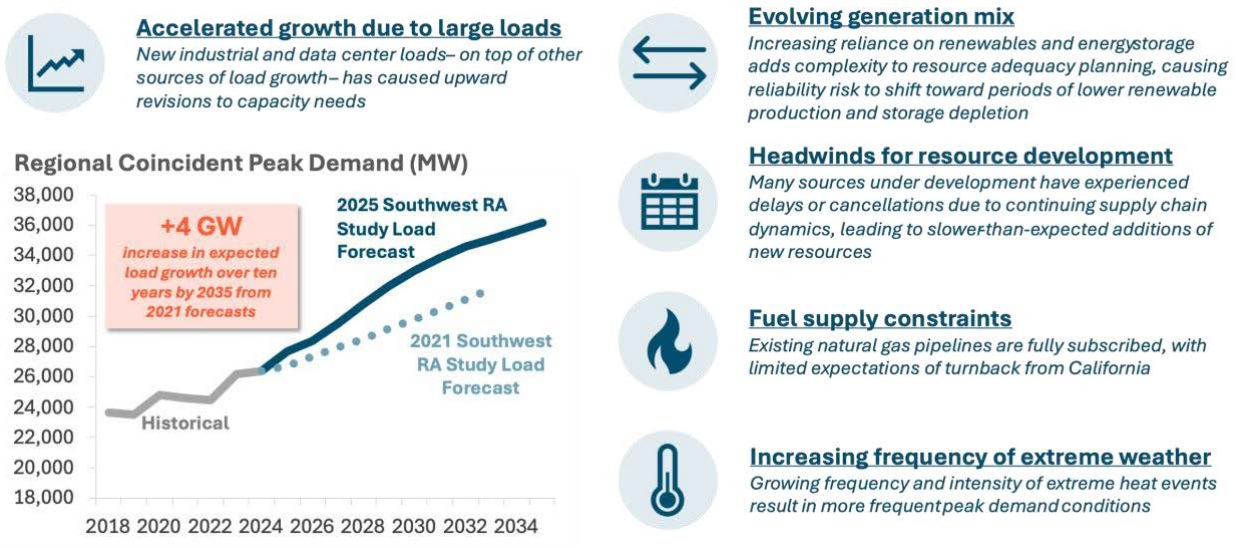
In 2022, E3 published ***Resource Adequacy in the Desert Southwest***, a comprehensive resource adequacy outlook for the U.S. Southwest region. Conducted shortly after high-profile reliability events in California (2020) and Texas (2021), the 2021 study quantified the resources needed to maintain regional reliability and evaluated whether utilities' plans would be sufficient to meet those needs using industry-leading loss-of-load-probability modeling. The study highlighted three key findings:

1. Load growth and aging plant retirements are creating a significant need for new capacity (13+ GW of effective capacity across the region by 2033) – but utilities' current resource plans have identified resources sufficient to meet those needs
2. A large share of the region's needs will be met with solar, storage, and other "non-firm" resources – but firm resources will remain essential for reliability
3. The scale of new resource additions needed requires unprecedented levels of development, necessitating immediate and sustained action over the next decade

These conclusions, as well as the study's thorough description of resource adequacy best practices, have since helped shape the regional discourse on resource adequacy.

Looking forward, the region's utilities face an increasingly complex set of challenges in planning a reliable electricity system. Transformational changes with direct implications upon the electricity system – some anticipated and some unforeseen – are underway, creating an environment of elevated complexity, uncertainty, and risk. These key developments are shown in Figure 1-1.

Figure 1-1. Key trends in the Southwest with direct implications for resource adequacy



Despite these developments, this assessment reaffirms the conclusions reached by the 2021 study, underscoring a pressing need for new resources and the importance of successful implementation

of plans to ensure regional resource adequacy. In addition to reaffirming the prior study's near-term conclusions, this study extends the analysis to include a longer-term resource adequacy outlook beyond 2035.

1.1. Study Scope and Purpose

In light of these developments, the six utilities that sponsored *Resource Adequacy in the Desert Southwest* commissioned this follow-up study to provide an updated outlook of resource adequacy for the region. This study's scope is more expansive than the previous assessment, including both near-term and long-term evaluations of regional resource adequacy. The two assessments focus on different questions and rely on different modeling approaches:

- The **"Near-Term Assessment,"** which provides an updated projection of the region's resource adequacy position over the next decade based on utility plans, reprises the analytical methods used in the previous study using updated input data and considers the current progress and challenges towards implementing resource plans.
- The **"Long-Term Assessment"** extends beyond the scope of the prior study to evaluate the region's resource adequacy needs over a twenty-year period, exploring the features and characteristics of resource portfolios capable of meeting long-term resource adequacy needs. It does so by constructing and analyzing multiple hypothetical portfolios across a range of load forecasts and clean energy penetrations.[1] These portfolios are not projections or regional forecasts, but instead collectively show a range of potential long-term outcomes.

These two analyses complement to one another: the near-term analyses focus on the specific question of whether utilities' plans will be sufficient to maintain resource adequacy in the coming decade, while the long-term analysis explores a broader range of potential long-term portfolios, providing context for how near-term plans align with long-term needs. The scope and design of these two complementary efforts are contrasted in Table 1-1.

[1] The different clean energy penetrations are a key study design element and does not reflect the region nor any individual utility's goals. Changing the clean energy penetrations allows the study to explore common and uncommon patterns across a broader range of possible future portfolios and energy mixes.

Table 1-1. Contrasting scopes for the near-term and long-term assessments of resource adequacy

Study Element	Near-Term Assessment	Long-Term Assessment
Time Horizon	**Ten years** *(2025-2035)*	**Twenty years** *(through 2045)*
Modeling Tools	**RECAP** *(loss-of-load-probability)*	**PLEXOS & RECAP** *(long-term capacity expansion & loss-of-load-probability)*
Load Forecast	**Single load forecast** *provided as inputs by utilities and aggregated by E3*	**Three load forecasts** *developed by E3 to reflect a range of long-term growth outcomes*
Resource Portfolios	**Single portfolio** *provided as an **input** by utilities*	**Twenty-three portfolios** *created as **outputs** using LTCE*
Principal Study Question	***Are utilities' resource plans sufficient to meet near-term resource adequacy needs of the region?***	***What are the features and characteristics of resource portfolios capable of meeting long-term resource adequacy needs?***

Both phases of analysis in this study focus on evaluation of resource adequacy at a regional scale, and do not account for certain details or constraints that may impact the specific decisions made by each utility to meet its resource adequacy needs while balancing other planning objectives. Examples of utility-specific considerations that are not captured directly in this analysis include: (1) transmission deliverability, (2) constraints on fuel supply, (3) utility-specific portfolio considerations, and (4) regional resource adequacy programs (e.g. Western Resource Adequacy Program). As such, while the analysis provides useful indicative and directional results to present a picture of resource adequacy needs at a regional level, the analysis presented herein should not be viewed as a substitute for or alternative to each individual's planning processes.

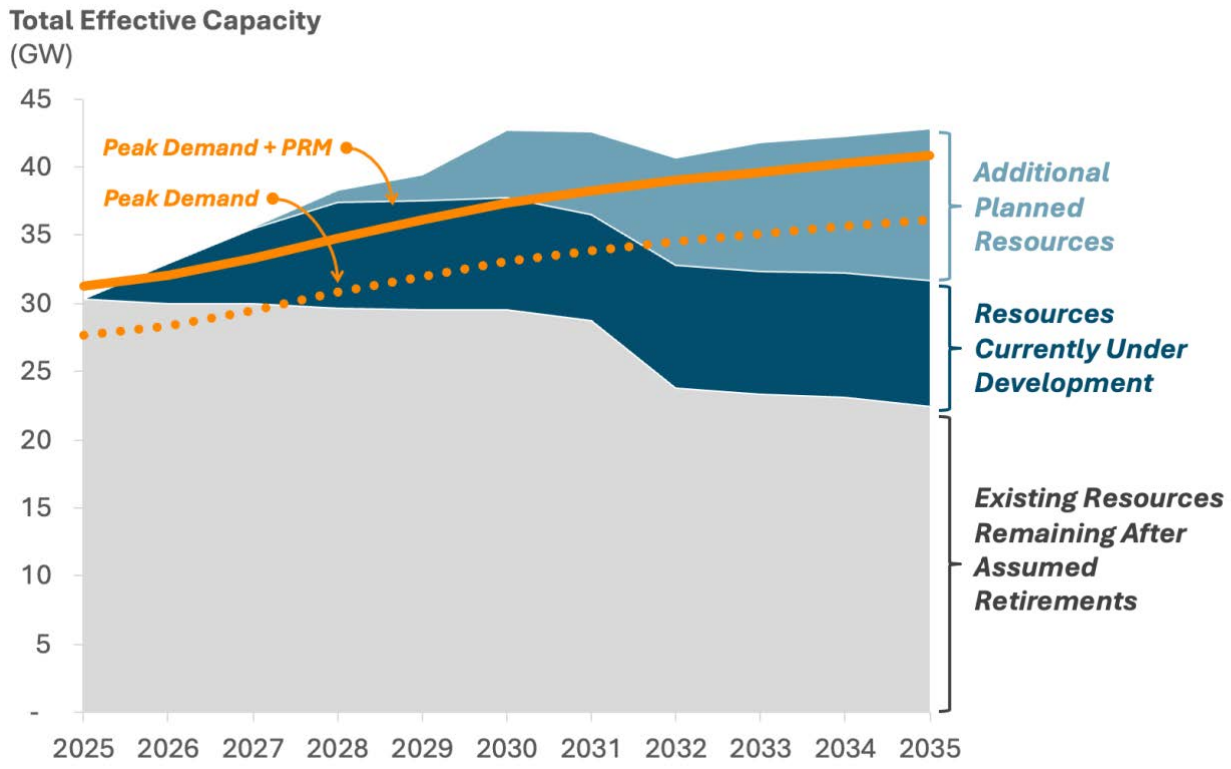
1.2. Near-Term Assessment Highlights

The near-term assessment provides a focused analysis on the adequacy of utilities' resource plans to maintain a level of reliability corresponding to a regional LOLE of 0.1 days per year or better. This analysis is conducted based on demand forecasts and portfolios provided directly by the utilities, which are analyzed using E3's RECAP model for LOLP modeling. Based on this analysis, Figure 1-2 shows the projected load-resource balance for the region under the assumptions used in this study, including both change in regional capacity need with growing loads and the effective capacity provided by existing resources, resources under development, and generic resources included in utility plans.

The near-term reliability outlook presented here uses load forecasts and resource portfolios provided by utilities in early 2025. Since that time, utilities have continued to update load forecasts and adjust resource plans in response to continuously changing conditions. For this reason, these results do not reflect the most current outlook for loads and resources within the region, but nonetheless serve as a useful directional indication of the relative scale of resource needs and provides validation that utility planning processes continue to identify resource portfolios capable of meeting regional reliability needs.

- Over the next decade, the aggregated demand forecasts identified across utility plans increase by 30%, or a total of over 8,000 MW. Incorporating a planning reserve margin of 13%, load growth increases the regional need for effective capacity by nearly 10,000 MW.
- At the same time, the retirements and expiring contracts of coal and natural gas plants assumed in this study result in the loss of approximately 8,000 MW of effective capacity.
- In conjunction, these two factors create a need for 18,000 MW of new effective capacity over the course of the next decade to maintain regional resource adequacy.
- Resources currently under development are poised to meet a portion of those needs, providing just over 9,000 MW of effective capacity and positioning the region to maintain load resource balance over the next several years.
- The additional generic resources included in utility plans are sufficient to close the remaining gap, creating some headroom in advance of planned resource retirements and satisfying the need for new capacity over the coming decade.

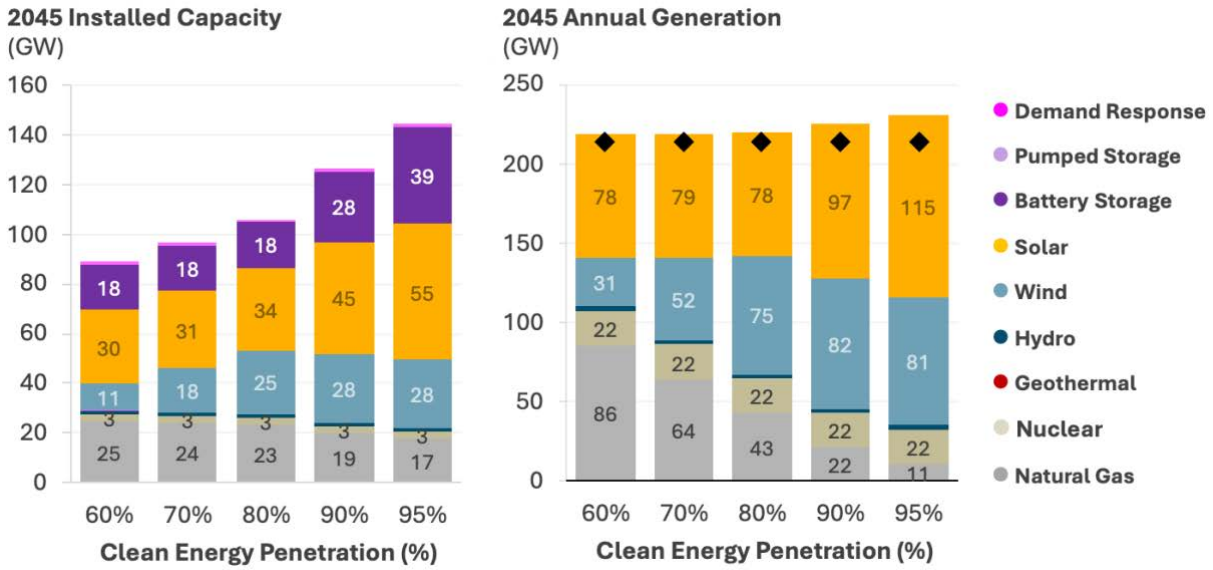
Figure 1-2. Projected regional load-resource balance according to utility plans current as of Q1 2025



1.3. Long-Term Assessment Highlights

The installed capacity and annual generation by resource type for five portfolios spanning clean energy penetrations from 60 to 95% under the Reference load forecast are shown in Figure 5-5. This collection of portfolios, each designed to meet a regional resource adequacy target of 0.1 days per year, show a range of plausible pathways to meet long-term energy and resource adequacy needs in the Southwest region.

Figure 1-3. Installed capacity and annual generation mix at different clean energy penetrations, Reference load forecast



Several observations are self-evident in these portfolios:

- While the specific quantities vary, all portfolios meet regional resource adequacy needs with a diverse mix of firm (gas and nuclear), renewable (wind and solar), and energy-limited (storage, DR, and hydro) resources.
- The differences in capacity among portfolios provides a measure of the relative effectiveness of firm, variable, and energy-limited resources in contributing to resource adequacy needs: from 60 to 95%, the total quantity of incremental renewables (+42 GW) and storage (+21 GW) is nearly eight times greater than the quantity of natural gas resources displaced (-8 GW).
- While the share of the energy mix served by natural gas decreases in inverse proportion to the penetration of clean energy resources, the amount of installed capacity needed to maintain reliability does not exhibit the same decline. Even in a 95% clean energy portfolio where natural gas accounts for only 5% of annual energy, the installed capacity of natural gas resources necessary to ensure reliability (17 GW) is roughly 40% of the system peak demand.

Additional sensitivities examine alternative load forecasts and the availability of emerging technologies, and while the composition of the portfolios adjust according to the specific assumptions made, the general observations described above hold true across all scenarios modeled.

1.4. Key Findings

The near-term and long-term assessments inform six key findings from this assessment. The first three focus primarily upon the results of the near-term assessment, and the second three build upon these based on the results of the long-term assessment.

1. Need for New Resources is Urgent

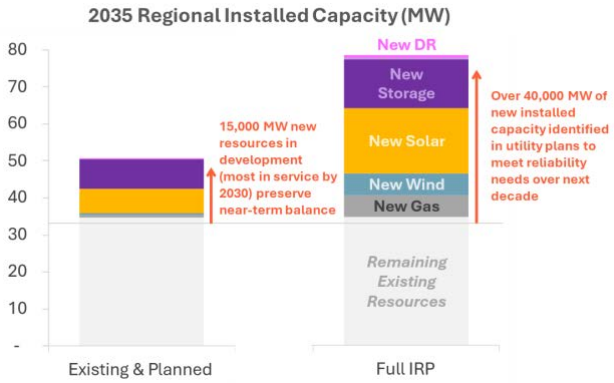
Large increases in regional demand, coupled with anticipated retirements, continue to drive a significant need for new resources across the region to maintain reliability

Over the next decade, the anticipated demand based on utility inputs to this study shows regional coincident peak demand increasing from roughly 27,500 MW to over 36,000 MW. At the same time, assumed retirements and expiring contracts with existing resources result in the loss of nearly 8,000 MW of effective capacity from the 2025 existing portfolio. For a system at or near load-resource balance today, the compound effect of these two changes is a total need for new *effective* capacity of roughly 18,000 MW over the next decade.

2. Utility Plans Demonstrate Adequacy

Over the next decade, utilities' resource plans include new natural gas, renewables, and storage sufficient to maintain regional resource adequacy

Collectively, the utilities' resource plans provided as inputs for this assessment include over 40,000 MW of new installed capacity by 2035. If these resources are successfully brought in service according to prescribed schedules – which will require a rate of new resource additions far greater than recent historical trends – this study shows that the region will maintain sufficient generating capacity to ensure a level of resource adequacy consistent of LOLE of 0.1 days per year or better.



Notably, the *nameplate* capacity of the resource additions included in utility plans (40,000 MW) far exceeds the amount of *effective* capacity they provide to the system to ensure reliability due to the inherent limitations of variable and energy-limited resources. [2]

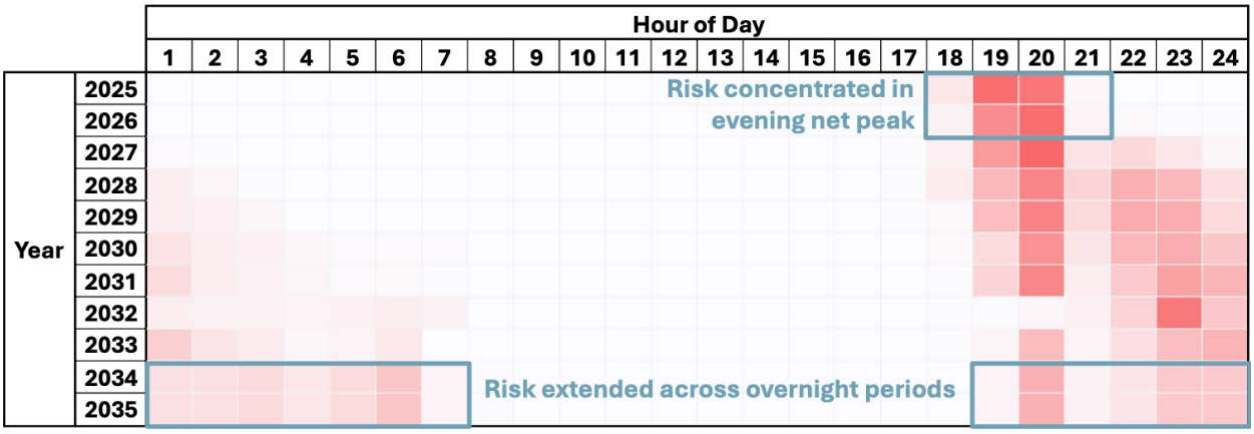
[2] Effective capacity (or perfect capacity) measures a resource's contribution to resource adequacy, typically measured against a "perfect resource" or a resource that is available at all times.

3. Reliability Risks are Shifting Rapidly

Reliability risk has already shifted from afternoon peak to the evening "net peak," and will extend deeper into overnight periods as resource mix evolves

The Southwest utilities are planning to meet a growing share of future resource adequacy needs with renewable and energy storage resources; by 2035, these resources are projected to account for roughly half of the total effective capacity in the region. These portfolio changes directly impact the timing of reliability risks, which shift away from the traditional peak period as penetrations of variable resources rise. This effect is already present in today's system, as the growth of solar has caused risk to shift into the evening. Over the next decade, increasing levels of energy-limited resources will continue to shift and extend the periods when the system is at the edge of reliability (see Figure 1-4). Based on utility plans, higher risks in the late evening and overnight periods could begin to emerge as soon as 2027.

Figure 1-4. Relative loss-of-load risk by time of day based on utility plans, 2025-2035



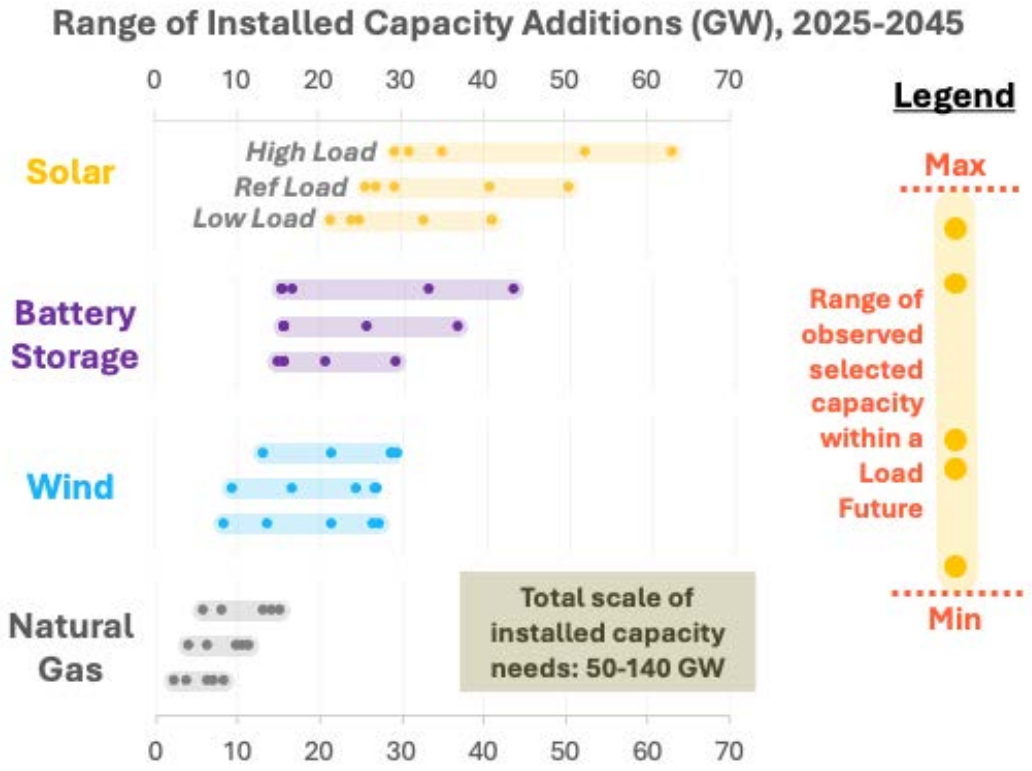
These effects are caused by evolving portfolio identified across all utilities to meet their needs, and in turn, directly impact the contributions that additional resources can make to resource adequacy in multiple ways. With existing solar penetration shifting risk to late evenings, marginal solar additions provided limited reliability value (marginal solar provides between 5 to 7%). Beyond 2027, the extension of risk into the overnight periods contributes to the observed declines in the marginal capacity value of short-duration storage resources (4-hr storage decreases from 90% in 2025 to 38% in 2035), which in turn increases the relative value of resources that can provide longer duration services to the grid and firm resources capable of generating over sustained periods without limits on their use.

4. Diversity is a Robust Long-Term Strategy

Meeting growth with a combination of new gas, renewables, and storage resources is a robust strategy across a wide range of longer-term future conditions

Beyond 2035, maintaining resource adequacy, as loads continue to grow and existing resources retire, will require substantial investments in new resources. This study demonstrates that regional resource adequacy can be met with a wide range of resource mixes, showing reliable resource portfolios that span from 60 to 95% clean energy; across all portfolios studied, the total amount of new installed capacity added between 2025 and 2045 ranges from 50 to 140 GW. In all cases where the availability of commercially available technologies is not explicitly restricted, long-term needs are met by a diverse mix of new renewables, storage and natural gas resources; the range of new resource additions by technology across the twenty-year period are shown in Figure 1-5. To the extent emerging technologies mature, they may also contribute to regional resource adequacy needs (as evidenced by the selection of new nuclear in several portfolios) but do not appear to diminish the importance of resource diversity. All portfolios also include continued expansion of energy efficiency and demand response; beyond these levels, additional demand-side resources (including behind-the-meter generation, virtual power plants, and incremental energy efficiency and demand response) could also contribute to meeting regional needs if they provide capabilities aligned with the future needs of the electricity system.

Figure 1-5. New installed capacity additions from 2025 to 2045 across portfolios in the long-term assessment

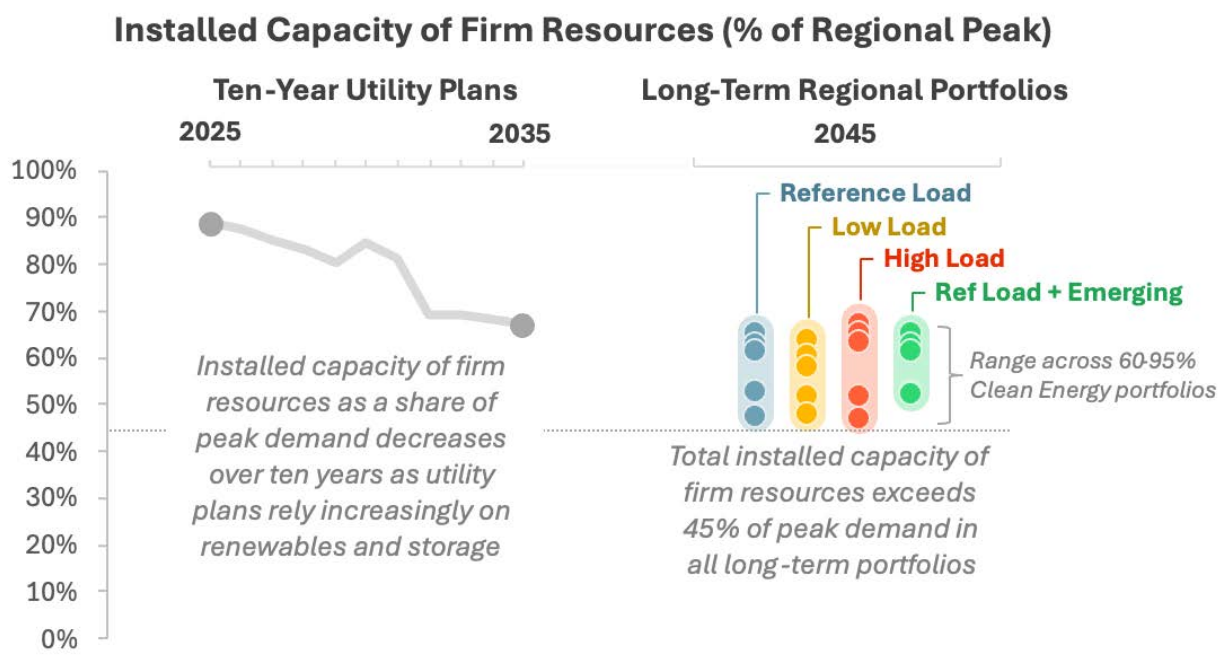


5. Firm Resources are Critical to Reliability

Firm generation resources remain essential to ensuring long-term resource adequacy and mitigating risks of large energy deficiencies, particularly during periods when renewable output is low

While the contributions of variable and energy-limited resources to resource adequacy are substantial across all portfolios analyzed, both categories of resources are subject to significant declines in their marginal capacity value at higher penetration. In practice, this means that even if portfolios include renewables and storage capable of serving most annual energy needs, ensuring resource adequacy also requires "firm" resources capable of producing energy across sustained periods when renewables and energy storage may be unavailable. Across all portfolios analyzed in the long-term assessment where new firm resource options are unconstrained, their total installed capacity ranges between 45-70% of system peak demand (Figure 1-6). In all long-term portfolios, nuclear and natural gas resources play a critical role in ensuring reliability when electric demand is high, renewable availability is low, and energy storage resources have been depleted (for instance, during cloudy winter weeks). Under such conditions, resources with the capability to generate on demand for as long as necessary allow the system to maintain reliability.

Figure 1-6. Summary of firm resource contributions across near-term and long-term assessments

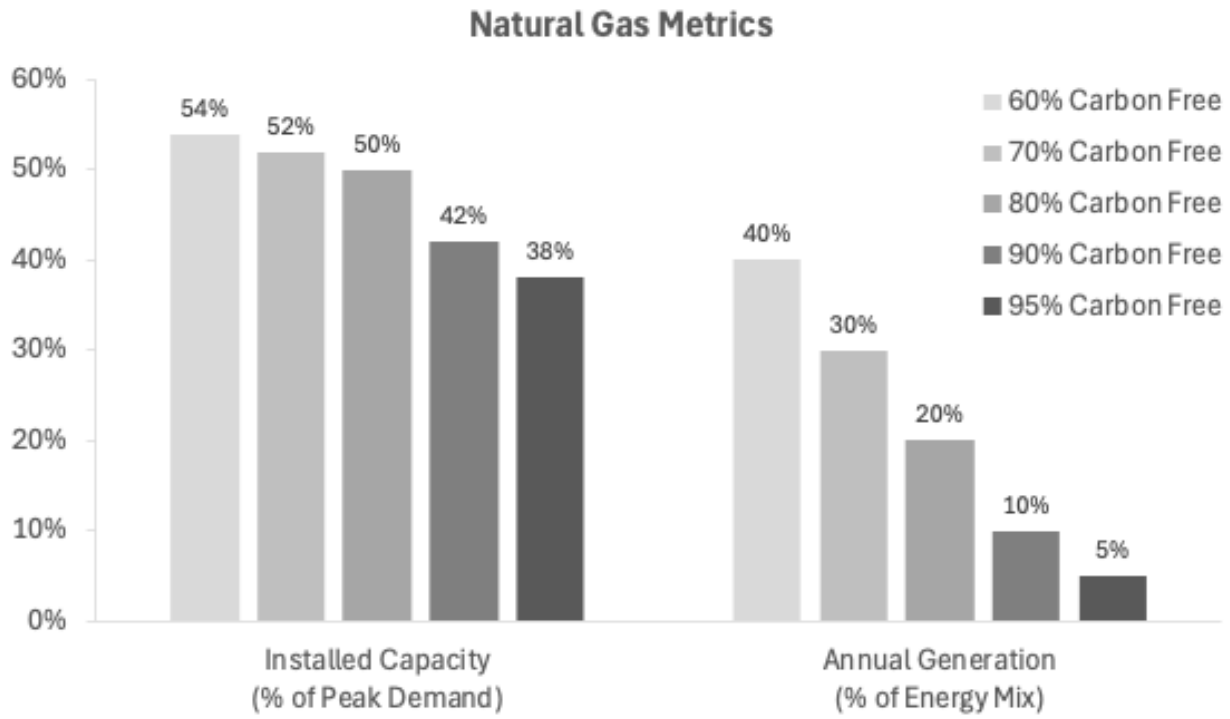


6. Natural Gas Remains the Primary Firm Option

Across all portfolios, natural gas fulfills the majority of the region's long-term need for firm resources, even under the highest clean energy penetrations studied.

The range of portfolios in the long-term assessment yields useful insights into the future adequacy of natural gas, captured through three metrics, shown in Figure 1-7: (1) **installed capacity,** the total gas capacity needed to ensure reliability and (2) **annual generation,** the share of regional energy produced by gas-fired resources. Across the portfolios, as clean energy penetration rises from 60 to 95%, annual gas generation falls sharply (from 40% to 5% of total energy) while installed capacity declines only modestly, from 54 to 38% of peak demand. This contrast is the key finding: increasing clean energy primarily reduces how often gas resources must run, not how much capacity is required. Even at 95% clean energy, a large amount of natural gas capacity (nearly 40% of peak demand) plays a critical reliability role, where it serves as a rarely-used backstop option during periods of low renewable output.

Figure 1-7. Key metrics for natural gas fleet in long-term adequacy assessment



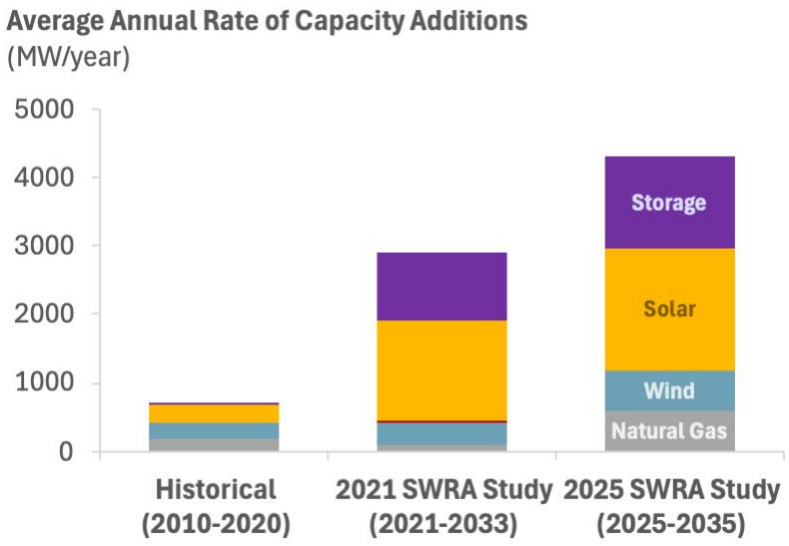
These results further underscore the finding that additions of new natural gas resources to the region are part of a robust strategy to meet near- and long-term resource adequacy needs, capable of supporting grid reliability across a wide range of future clean energy penetrations and load levels.

1.5. Study Implications

Both the 2021 and 2025 assessments indicate that, despite increasing portfolio complexity and evolving resource adequacy risks, the utilities' collective planning practices are effective in their identification of resource portfolios with the technical ability to maintain regional resource adequacy. Notably, the two assessments reached this conclusion while evaluating different load forecasts and resource portfolios. The consistency of this technical result provides strong evidence that utilities' methods and analytical toolkits provide a sound foundation for resource adequacy planning, and that utilities have used this foundation to adjust plans quickly in response to the changing outlook for future demand.

Having demonstrated that the utilities' plans have the technical capability to meet projected needs, the most immediate challenge for maintaining regional resource adequacy lies in successful implementation. Meeting the needs forecasted in this study would require that utilities add over 4,000 MW of new installed capacity to the system each year over the next decade – a quantity that exceeds the necessary rate of additions previously identified in the 2021 study and eclipses the long-term historical average by a factor of four (see Figure 6-5).

Figure 1-8. Comparison of annual average capacity additions



In an environment marked by heightened uncertainty and rapid change, translating these plans into reliable real-world outcomes presents a more multifaceted set of challenges than the planning itself. Successful implementation will require coordinated orchestration across a range of processes, systems, and institutions involving a wide range of regional stakeholders. The region's utilities will naturally play a central role in each step of implementation, but the ultimate outcomes will reflect the collective performance of actors and systems that no single entity controls. Given the rapid pace of change and potential for unanticipated shifts in the energy landscape, even well-formulated plans will likely require frequent reevaluation and revision; the ability to monitor emerging conditions, identify gaps early, and adapt accordingly will be as important as the plans themselves. The risk factors in Table 1-2 represent the most significant aspects of implementation required to ensure resource adequacy.

Delays or unexpected obstacles caused by any one of these factors – or further increases in regional demand not anticipated at the time of this study – could jeopardize utilities' ability to add resources to the system at the pace needed to meet regional growth projections reliably. To mitigate these risks

and support successful implementation, utilities and regional stakeholders can focus on several near-term actions.

While these actions cannot fully eliminate implementation risk, sustained focus in these areas will improve the likelihood that planned resources are delivered on time and that regional reliability is maintained under increasingly uncertain conditions.

Table 1-2. Summary of implementation considerations and potential strategies to limit risk

Implementation Consideration	Description of Potential Risks	Potential Solutions
Load Forecast Uncertainty	Large customer growth continues to be highly uncertainty, making reliability planning a moving target	• Strengthen interconnection and service agreements • Design rates or tariffs that better align large customer development with system planning needs
Procurement Risk & Supply Chain	Supply chain constraints have led to increasing project costs, longer lead times for equipment, and project delays and cancellations	• Initiate procurements earlier in advance of resource need • Maintain diversified pipeline of projects • Incorporate flexibility to account for delays or cancellations • Leverage cost-effective demand-side programs to limit bulk system needs
Transmission Interconnection & Deliverability	Large scale of resource development will also require coordinated buildout of transmission system, which can include longer study processes and long lead times	• Pursue parallel development of generation and transmission through Integrated System Planning • Prioritize transmission upgrades that unlock multiple resources • Repurpose existing infrastructure made available as legacy plants retire
Permitting & Regulatory Approval Processes	New projects require permits and regulatory approvals from a variety of bodies (e.g. local governments, regulatory agencies and boards, and federal bodies) – each of which poses potential to delay development	• Engage early with permitting agencies and local communities • Explore potential to streamline local permitting with model ordinances • Repurpose brownfield power plant sites
Operations & Market Integration	Increasingly penetrations of variable and energy-limited resources add complexity to grid operations, requiring accurate forecasting and sophisticated dispatch algorithms to maximize storage value	• Invest in advanced forecasting, grid visibility tools, and optimized dispatch strategies • Coordinate with market operators to ensure market rules enable maximum storage value
Fuel Supply	Plans to right-size fuel transportation rights for a growing gas fleet depend in part on development of a new interstate pipeline, a large multijurisdictional infrastructure project that could experience delays for a variety of reasons	• Secure fuel transportation capacity • Identify short-term risk mitigation strategies to ensure adequacy in the event of delay

2. Introduction

In 2022, E3 published ***Resource Adequacy in the Desert Southwest***, a thorough analysis of the resource adequacy outlook for the region over the coming decade. Following shortly after high profile reliability events in California (2020) and Texas (2021), this study sought to quantify the resource needs to ensure reliability and evaluate the adequacy of utilities' plans to meet those needs using industry-leading loss-of-load-probability modeling. Three key findings emerged from the analysis:

1. Load growth and aging plant retirements are creating a significant need for new capacity (13+ GW of effective capacity across the region by 2033) – but utilities' current resource plans have identified resources sufficient to meet those needs
2. A large share of the region's needs will be met with solar, storage, and other "non-firm" resources – but firm resources will remain essential for reliability
3. The scale of new resource additions needed requires unprecedented levels of development, necessitating immediate and sustained action over the next decade

These key findings, as well as the study's thorough description of resource adequacy best practices, have since helped shape the regional discourse on resource adequacy.

2.1. Key Developments Since 2021

Since 2021, observed resource additions in the Southwest have largely aligned with projections from five years ago. While load growth has slightly outpaced prior forecasts, the region has largely maintained a stable balance of loads and resources during this period.

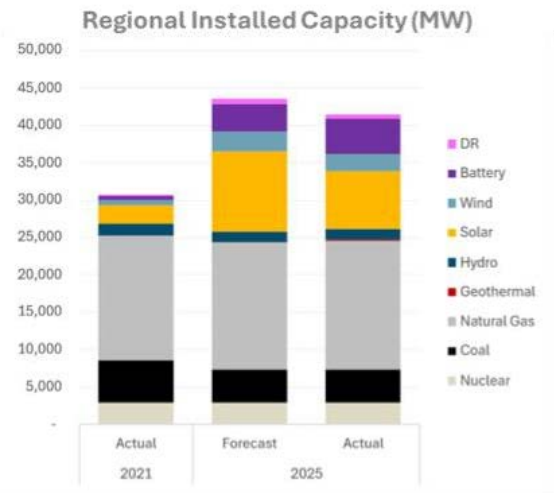
- Regional electricity demand has grown at a slightly faster rate than anticipated, exceeding previous forecasts by roughly 750 MW.
- The capacity of firm resources (nuclear, coal, and gas) has closely aligned with projections, showing a slight reduction since 2021 with retirements at Cholla and San Juan power plants.
- Additions of solar and wind resources have lagged projections by roughly 3,000 MW and 500 MW, respectively; a reflection of development challenges experienced by many of the projects under development in the region;
- Additions of energy storage resources have exceeded previous projections by roughly 1,000 MW, helping preserve load-resource balance despite other headwinds and stressors.

A summary comparison between the 2025 projections from the 2021 study and actual current conditions is provided in Figure 2-1.

Figure 2-1. 2025 system comparison: projections from 2021 study vs. actual

Comparing the Outlook for 2025 vs. Actual Results

Impact on Resource Adequacy : Actual vs. Forecast		
Load Growth	●	Load growth slightly higher than forecast: Actual CP (**27,500 MW**) vs. forecast CP (**26,750 MW**)
Coal Retirements	-	Cholla & San Juan retired as planned
Natural Gas Additions	-	Small capacity upgrades, no major new generation projects added through 2025
Renewable Additions	●	Fewer new solar resources added than plans
Storage Additions	●	More new energy storage resources developed
Overall Regional Position	●	**Regional resource adequacy position slightly tighter than anticipated**



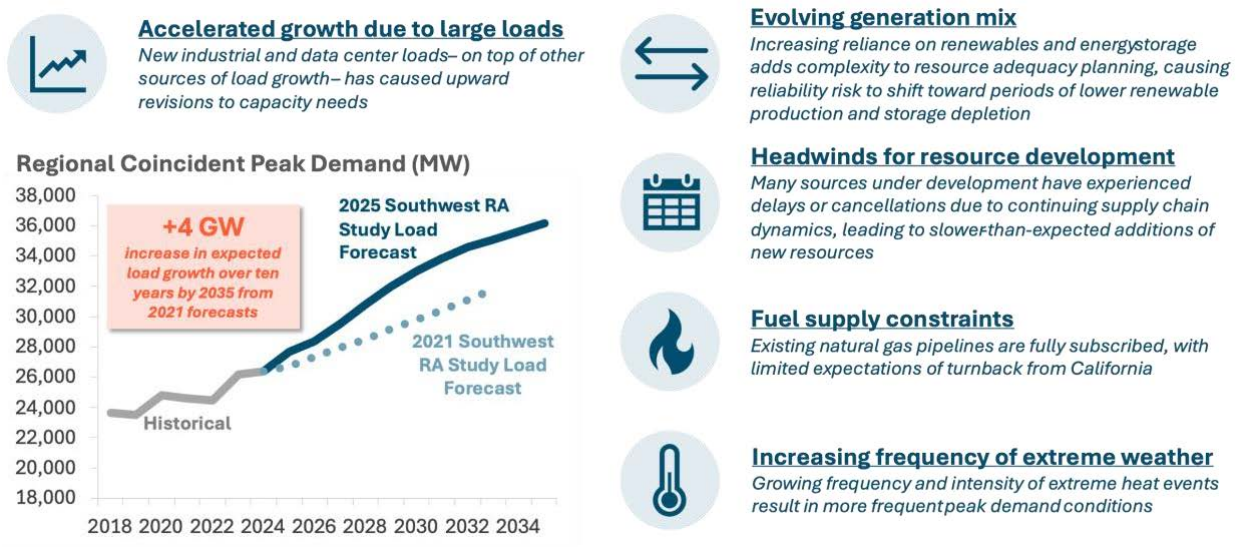
Looking forward, the region's utilities will continue to face an increasingly complex set of challenges in planning a reliable electricity system. Transformational changes with direct implications upon the electricity system – some anticipated and some unforeseen – are underway, creating an environment of elevated complexity, uncertainty, and risk. These include:

- **Accelerating load growth,** due primarily to an increase in the number of data centers and other large manufacturing and industrial customers seeking electric service in the Southwest;
- **Evolving resource mix** and the corresponding task of planning and operating an increasingly complex electricity system that includes a mix of firm, variable, and energy-limited resources.
- **Resource development headwinds,** including delays and cancellations of projects under development, as constraints in global and domestic supply chains have driven unanticipated cost increases and equipment backlogs;[3]
- **Fuel supply constraints,** as the existing interstate pipeline system that delivers natural gas to generation resources within the region is nearly fully subscribed;
- **Increasing frequency of extreme weather,** including record-breaking heat waves in key population centers[4];

These evolving trends and the challenges they pose to utilities are summarized in Figure .

[3] Between 2021 and 2025, increased demand for all resources, but supply chains
[4] See, for example: https://www.nytimes.com/2023/07/31/us/phoenix-heat-july.html

Figure 2-2. Key trends in the Southwest with direct implications for resource adequacy



2.2. Study Scope and Purpose

In light of these developments, the six utilities that originally sponsored *Resource Adequacy in the Desert Southwest* have commissioned this study to provide an updated forward-looking view of resource adequacy across the region. This study's scope is more expansive than the previous assessment, including both near-term and long-term evaluations of regional resource adequacy needs. The two assessments focus on different questions and rely on different modeling approaches to answer them:

- The **"Near-Term Assessment,"** which focuses on the region's position over the next decade based on utility plans, reprises the modeling tools and approach used in the previous study to provide an updated outlook on resource adequacy.
- The **"Long-Term Assessment"** extends beyond the scope of the prior study to evaluate the region's resource adequacy needs over a twenty-year period, exploring the features and characteristics of resource portfolios capable of meeting long-term resource adequacy needs. It does so by constructing and analyzing multiple hypothetical portfolios across a range of load forecasts and clean energy penetrations.[5] These portfolios are not projections or regional forecasts, but instead collectively show a range of potential long-term outcomes.

These two analyses complement one another: the near-term analyses focus on the specific question of whether utilities' current plans will be sufficient to maintain resource adequacy in the coming decade, while the long-term analysis widens the aperture to explore a broader range of potential

[5] The exploration of clean energy penetration across different portfolios is a specification enforced for this study's design. With this specification for each portfolio, the study can explore a range of portfolios with different resource mixes, varying in levels of gas, storage, and renewables to meet resource adequacy in the Southwest.

long-term options that provide context for how decisions made in the near-term will impact the region across the next several decades.

The scope and design of these two complementary efforts are contrasted in Table 2-1.

Table 2-1. Contrasting scopes for the near-term and long-term assessments of resource adequacy

Study Element	Near-Term Assessment	Long-Term Assessment
Time Horizon	**Ten years** *(2025-2035)*	**Twenty years** *(through 2045)*
Modeling Tools	**RECAP** *(loss of load probability)*	**PLEXOS & RECAP** *(long-term capacity expansion & LOLP)*
Load Forecast	**Single load forecast** *provided as inputs by utilities and aggregated by E3*	**Three load forecasts** *developed by E3 to reflect a range of long-term growth outcomes*
Resource Portfolios	**Single portfolio** *provided as an **input** by utilities*	**Twenty-three portfolios** *created as **outputs** using LTCE*
Principal Study Question	***Are utilities' resource plans sufficient to meet near-term resource adequacy needs of the region?***	***What are the features and characteristics of resource portfolios capable of meeting long-term resource adequacy needs?***

Both phases of analysis in this study focus on evaluation of resource adequacy at a regional scale, and do not account for specific details or constraints that may impact the decisions made by each individual utility to meet its resource adequacy needs while balancing other planning objectives. Examples of utility-specific considerations that are not captured directly in this analysis include: (1) transmission deliverability, (2) constraints on fuel supply, and (3) utility-specific portfolio considerations. As such, while the analysis provides useful indicative and directional results that present a picture of resource adequacy needs at a regional level, the analysis presented herein should not be viewed as a substitute for or alternative to each individual utility's planning processes.

2.3. Report Contents

The remainder of this report is organized as follows:

- **Section 3** provides general background on resource adequacy and discusses key trends impacting resource adequacy planning for Southwest utilities;
- **Section 4** presents the near-term resource adequacy assessment;
- **Section 5** presents the long-term resource adequacy assessment; and
- **Section 6** provides key findings of the two assessments and discusses their implications.

3. Study Background

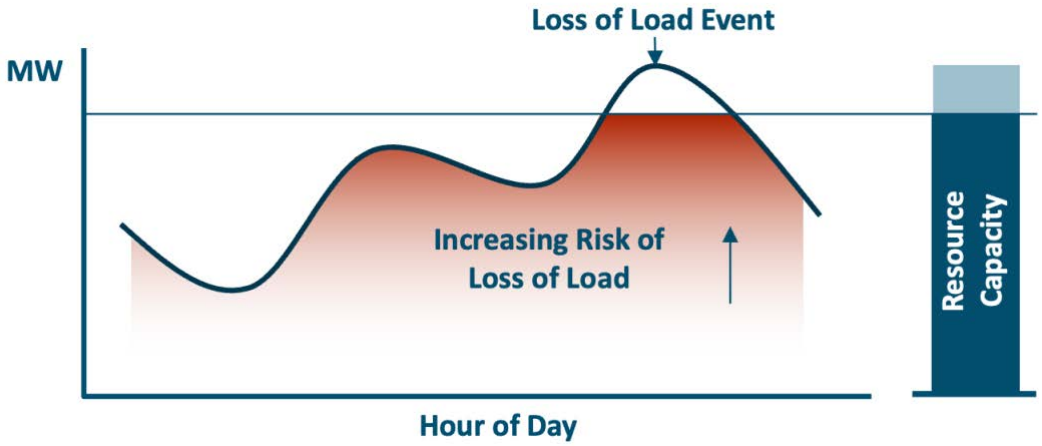
3.1. Defining Resource Adequacy

Resource adequacy is the ability of an electric power system to produce sufficient generation to meet loads across a broad range of weather and system operating conditions, subject to a long-run reliability target that limits the frequency of shortfalls to very rare instances. The resource adequacy of a system thus depends on the characteristics of its load—seasonal patterns, weather sensitivity, hourly patterns—as well as its resources—size, dispatchability, outage rates, and other limitations on availability. Ensuring resource adequacy is an important goal for utilities seeking to provide reliable service to their customers.

NERC Definition of Resource Adequacy

"The ability of the electric system to supply the aggregate electrical demand and energy requirements of the end-use customers at all times, taking into account scheduled and reasonably expected unscheduled outages of system elements."

Figure 3-1. Illustration of a loss of load event due to insufficient generation



While there is no single mandatory standard defined for resource adequacy, many utilities – including all sponsors of this study – rely on some interpretation of the "one day in ten years" planning target. While this rule of thumb has been interpreted in a number of different ways, the most common interpretation relies allows for a Loss of Load Expectation (LOLE) of 0.1 days per year. While there is no formal resource adequacy standard currently established for the Southwest region as a whole, the near-ubiquity of the one-day-in-ten-year target makes it useful as a benchmark for this study, and regional resource adequacy is evaluated relative to an LOLE of 0.1 days per year.

3.2. Recent Industry Trends and Developments

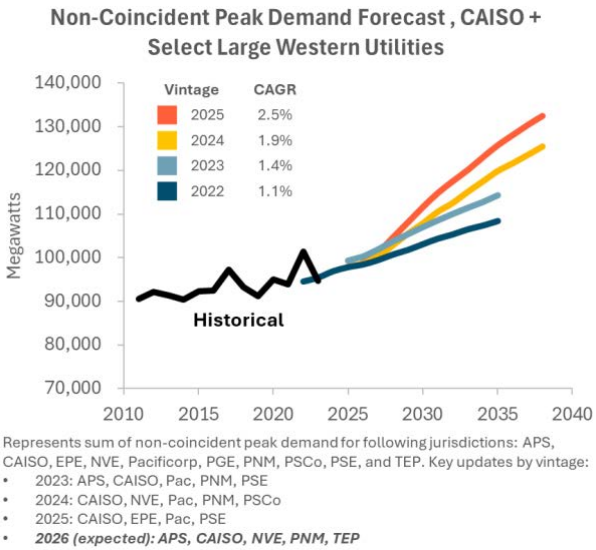
3.2.1. Increasing Load Growth

Arguably the most significant development since the 2021 study has been the increase in demand forecasts among utilities in the Southwest. These increases are largely the result of updates to the outlook for data centers and other large technological and industrial customers. The forecasts provided as inputs to this study, in aggregate, reflect a 20% increase in 2035 demand, a change that is almost entirely attributable to large customers.

This trend is not isolated to the Southwest: it is national in scope and scale. Multiple public studies suggest that rapid near-term growth could lead to a two- to three-fold increase in data center loads by the end of the decade:

- In a 2025 Grid Strategies report, the study states "Electricity usage is forecast to grow by an average of 5.7% per year over the next five years" and that "Data centers are the largest driver of demand and energy growth, accounting for about 55% of demand growth in utility load forecasts"
- A 2026 study published by EPRI, the findings reports that "In 2024, total U.S. data center nominal IT capacity is estimated to be 35 to 44 GW... By 2030, EPRI's scenarios for the realization of planned and announced projects result in a range of 56 to 132 GW U.S. total nominal capacity. "[6]

Figure 3-2. Evolution of peak demand forecasts for large Western utilities since 2022



The trend of accelerating load growth is also apparent in recent demand forecasts published by utilities across the Western Interconnection. The effect of progressive increases in utility demand forecasts across the broader western region is illustrated in Figure , which shows the combined non-coincident peak demand forecasts for CAISO and select large western utilities in the West based on their most recent published forecasts at different moments in

[6] Available at: https://powering-intelligence.epri.com

time.[7] Between 2022 and 2025, the compound annual growth rate among this group increased from just over 1% per year to 2.5% per year, resulting in an additional 10 GW of growth by 2035.

The challenges posed by the rapid growth of large customers are multifaceted:

- **Development Pace:** meeting the rapid pace of load growth requires a correspondingly rapid pace of new resource development, which creates strain upon global supply chains, local permitting processes, and a range of steps in the development process in between.
- **Forecast Uncertainty:** while the current pace of growth is rapid, long-term forecasts are subject to a heightened level of uncertainty; this uncertainty creates a confounding challenge for utilities making long-term investments to meet near-term growth;
- **Load Shape:** data centers and other large customers typically have relatively high "load factors" compared to residential and commercial customers, meaning that their loads are flatter throughout the day and year. As these loads become a growing share of the system, portfolios must be designed to account for round-the-clock needs of large customers.

3.2.2. Evolving Generation Mix

Due to wide-ranging technical, economic, and political forces, the composition of the generation mix is quickly shifting. Throughout the system, aging fossil generation resources are approaching the ends of their useful lives. In turn, the new resources added to the system to meet growing needs comprise a heterogenous mix of technologies, including natural gas, wind, solar, energy storage, and various demand-side resources. The transition of the electricity system to a more diverse mix of resources introduces new complexities to planning for resource adequacy.

For the purposes of describing the effects of different types of generation resources upon resource adequacy, generation resources can be classified into three broad categories:

- **"Firm"**: resources that can produce at or near maximum capacity for sustained periods of time, except when unavailable due to plant outages. Examples include nuclear, coal, and natural gas.
- **"Variable":** resources whose output varies hour by hour, typically as a function of meteorological conditions. Examples include wind and solar.
- **"Energy-limited":** resources with constraints on how long (and sometimes how often) they can generate at full capacity due to constraints that limit the amount of energy they can produce. Examples include hydroelectric generation, energy storage, and demand response.

Historically, most electricity systems have consisted primarily of firm resources, but as the penetrations of variable and energy-limited resources grow, their implications for resource

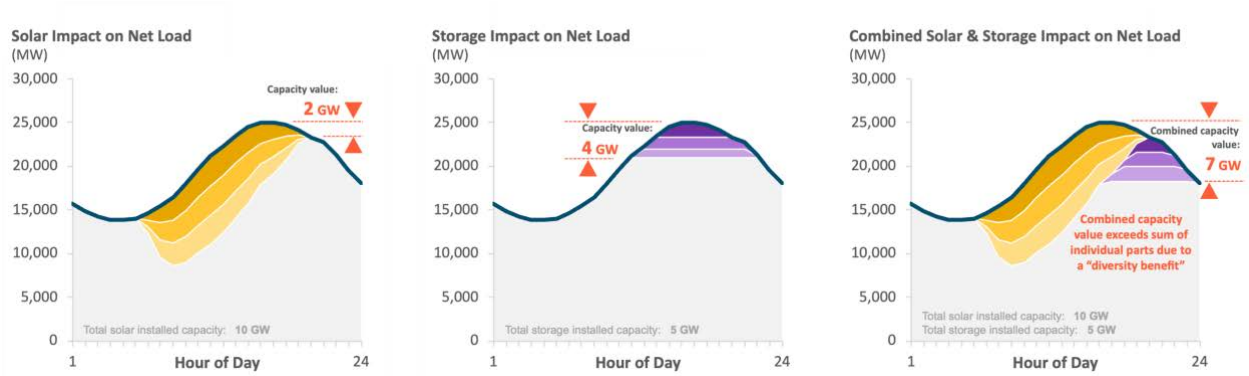
[7] While this graphic provides clear evidence of the trend of accelerating growth, it is also a lagging indicator: because many utilities release official load forecasts with integrated resource plans published on two- or three-year cycles, the forecasts included in the diagram above do not necessarily reflect each utility's most current expectations for load growth.

adequacy become significant. The contributions of variable and energy-limited resources differ from traditional firm resources in three important ways (illustrated in Figure 3-3.):

1. Because variable resource output is often lower than rated capacity during the periods in which supply is most constrained, the contribution of variable resources to resource adequacy is typically lower than their rated capacity. Further, as their penetration increases, the highest "net load" (load minus variable resource production, and a reasonable proxy for reliability risks) shifts away from system peak demand. In turn, this drives a "saturation effect" where the marginal value of variable resources decline with scale.
2. Because energy-limited resources have a finite ability to generate energy (e.g. a four-hour battery operated at full capacity will exhaust state of charge in four hours), they are also subject to saturation: as successive tranches of storage flatten net peak demand, the next tranche of storage must dispatch over a longer period to have the same effect.
3. The declining marginal value of both variable and energy-limited resources may be partially offset by the presence of interactive effects among different resources, often described as a "diversity benefit": a portfolio of complementary resources can provide a contribution to resource adequacy that exceeds the sum of its individual parts. The nature and size of this effect will vary based on the combination of resources (and can even be negative).

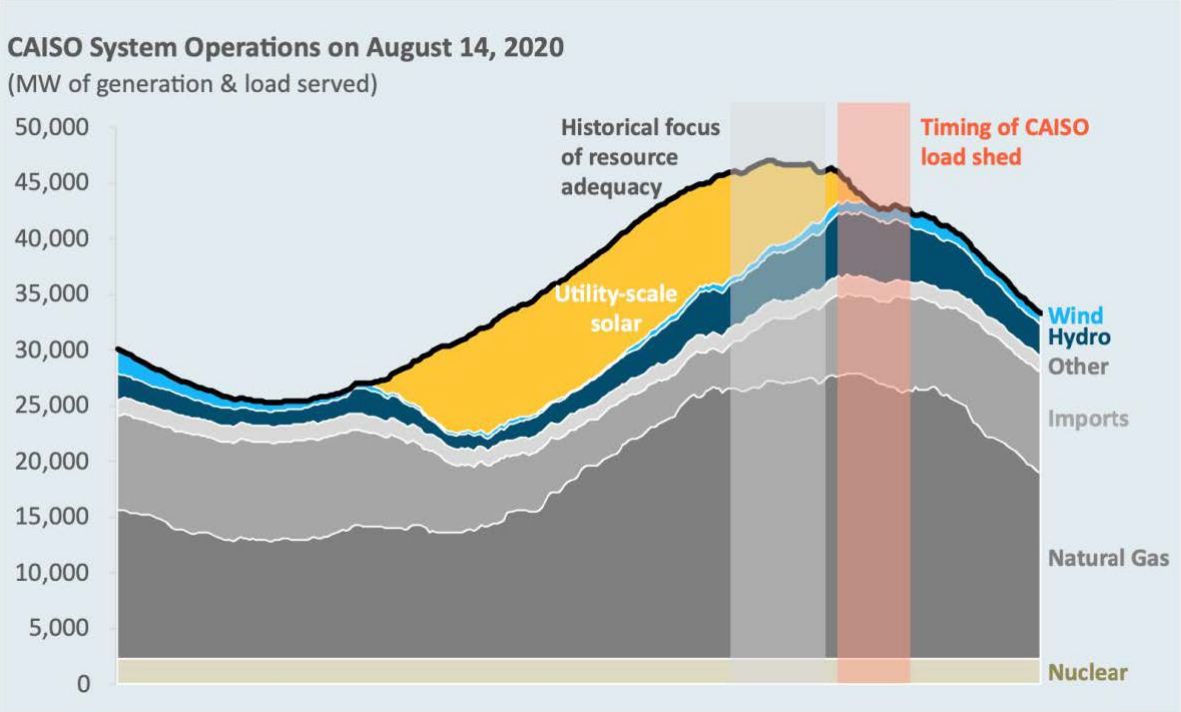
The underlying mechanism at the root of these complex, dynamic effects is the fact that increasing penetrations of both variable and energy-limited resources cause the periods of greatest reliability risk to shift away from the traditional peak period. As risk shifts or extends towards periods where a resource's availability is diminished, its marginal value declines; as risk shifts or extends into periods where a resource's ability is increased, its marginal value increases.

Figure 3-3. Illustrative impacts of solar and energy storage upon net load



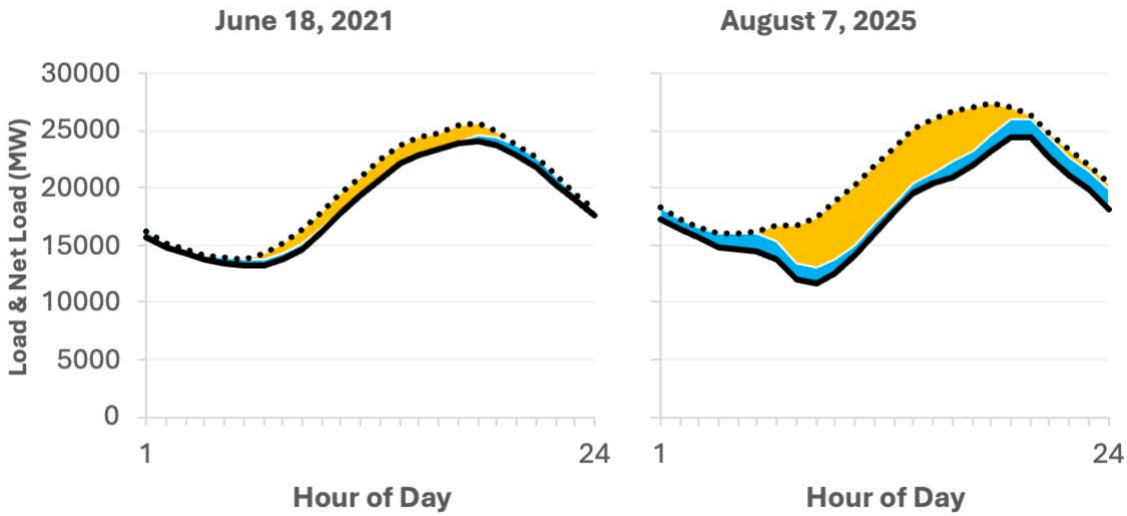
The August 2020 blackouts in California, highlighted in the 2021 study, remain the best real-world illustration of the shifting of reliability risks at higher penetrations of variable resources. Figure , developed from data published by CAISO, highlights the changing nature of resource adequacy risks under increased penetrations of solar; the period of the day during which load shedding was required occurred after the traditional peak period that has historically been the focus of resource adequacy planning.

Figure 3-4. CAISO system operations on August 14, 2020



Due to the large amount of solar generating capacity added in the Southwest region over the last five years, the same evening-peaking net load phenomenon is now also apparent. Figure compares the load and net load curves for the region on the regional peak days in 2021 and 2025, illustrating how the increasing penetration of solar has shifted the net load peak – and, by extension, the region's reliability risk, into the evening.

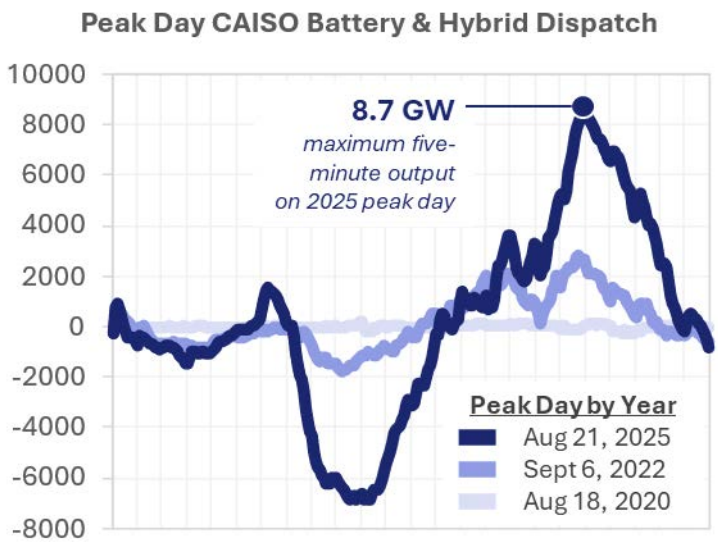
Figure 3-5. Load & net load curves for the Southwest region on regional peak days, 2021 and 2025



The real-world impact of energy storage on electricity systems is also now readily apparent. Since 2021, energy storage has matured from a technology in the early phases of commercial deployment (XX GW installed nationally at the end of 2021) to a proven resource at grid scale (XX GW at the end of 2025). Nowhere is its current impact on grid operations and its contribution to resource adequacy greater than in California, where battery storage resources in CAISO reached a five-minute maximum output of nearly 9 GW during the net peak period and into the evening on the day of the highest electricity demand (see Figure).

While significant amount of storage in the California system is now playing a key role in grid operations, the penetration is quickly approaching levels where the saturation effects described above are expected to emerge in the near future. The most recent analysis published by the California Public Utilities Commission projects that the marginal capacity value of storage will decline from 92% in 2026 to 75% by 2028 and 22% by 2030 as "critical hours spread to late afternoon and later into the night, contributing to storage ELCC declines."[8]

Figure 3-6. Dispatch of CAISO energy storage resources on select peak days



As the penetration of renewables, storage, and other non-firm resources continue to grow, so will the prominence of these complex dynamics. One of the implications that follows from these evolving challenges is that the timing of reliability risks will continue to shift towards periods when non-firm resources are not available – often periods of lower renewable production. During these periods, firm generation is the remaining resource that can dispatch at full capacity for prolonged periods. While the amount of firm resource capacity needed will vary from system to system, the essential role of firm capacity in maintaining resource adequacy – even in electricity systems with very high penetrations of renewables and storage – has been identified by numerous studies, including:

- *Long-Run Resource Adequacy under Deep Decarbonization Pathways for California*, a study completed by E3 in 2019;
- "The Role of Firm Low-Carbon Electricity Resources in Deep Decarbonization of Power Generation" (Sepulveda et al.), published by researchers at the Massachusetts Institute of Technology;

[8] Available at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2024-2026-irp-cycle-events-and-materials/reliability-filing-requirements_lses-2024-26_irp-plans_20260210.pdf

- *Net Zero America*, led by researchers at Princeton University to study pathways to meet a "net zero" carbon target for the United States by 2050;
- The *Los Angeles 100% Renewable Energy Study*, completed by the NREL to develop plans that would meet the City of Los Angeles' 100% renewable goals; and
- "Clean Firm Power is the Key to California's Carbon-Free Energy Future," a study co-funded by the Environmental Defense Fund and the Clean Air Task Force.

In many of these studies, the presence of firm resources alongside large penetrations of wind, solar, and storage is essential to the reliability of the system.

3.2.3. Headwinds Facing Resource Development

While resource needs are growing with increasing loads and the generation mix continues to evolve, utilities and project developers are also facing a more challenging environment to bring new resources online. Multiple sources indicate that the rates of project delays and cancellations and the lead times for new project development have increased in the past several years:

- A press release issued by the Energy Information Administration (EIA) at the end of 2025 reported that "[i]n the third quarter of 2025, solar projects representing about 20% of planned capacity reported a delay," a reduction from the highest rate of delay (25% in Q3 2024) but notably higher than the rates observed in 2020 (10-15%).[9]
- Experts at the Electric Power Research Institute (EPRI) reported that as of mid-2025, gas turbine manufacturers were typically quoting delivery lead times of up to five to seven years for new units, a considerable increase over historical norms.[10]
- A 2025 report published by Lawrence Berkeley National Laboratory (LBNL) reports that across a sample of 1,161 projects in service between 2009 and 2024, the length of time between projects securing an interconnection agreement and achieving commercial operations has increased from "…11 months for projects built in 2007, 19 months in 2015, and 35 months for those built in 2024."[11]
- An analysis by Cleanview, a market intelligence platform, reports that "…1,891 power projects with a combined 266 GW of generation capacity have been canceled in 2025—equivalent to roughly one-quarter of America's entire current electricity generation capacity."[12]

These "headwinds" are directly linked to the observed rapid increases in energy demand at a national scale, which has placed additional pressure on many of the processes and necessary steps

[9] Available at: https://www.eia.gov/todayinenergy/detail.php?id=66604
[10] Available at: https://www.spglobal.com/energy/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply

[11] Available at: https://emp.lbl.gov/sites/default/files/2025-12/Queued%20Up%202025%20Edition%20-%2012.15.2025.pdf
[12] Available at: https://cleanview.co/content/canceled-projects-report

to develop new resources. Multiple factors contribute to the protracted timelines for new resource development and the increasing costs for new resources, including:

- **Interconnection study processes,** which have become increasingly complex and time-consuming as the volume of projects in interconnection queues has grown and system impact analyses have become more rigorous.
- **Permitting processes,** which often require coordination across multiple jurisdictions and can introduce multi-year timelines due to environmental review, siting challenges, and stakeholder engagement requirements
- **Supply chain constraints,** which are contributing to both longer backlogs for specialized equipment and rising project costs, particularly for transformers, gas turbines, and other critical grid components.
- **Financing and market conditions,** which have increased the cost of capital relative to historically low levels in 2020 and, in some cases, have contributed to project delays or cancellations as developers reassess project economics.
- **Workforce and labor constraints,** which are limiting the availability of skilled labor necessary for engineering, procurement, and construction, thereby extending project schedules and increasing development risk.

Collectively, these factors contribute to longer and less predictable development timelines, increasing the risk of delays in the development of resources needed to ensure reliability.

3.2.4. Fuel Supply Constraints

In the Southwest region, natural gas power plants represent a large share of the region's total installed capacity today (roughly 17 GW of a total of 30 GW) and play a key role in ensuring reliability within the region. In order to do so, gas power plants rely on pipeline systems for the "just-in-time" delivery of fuel.

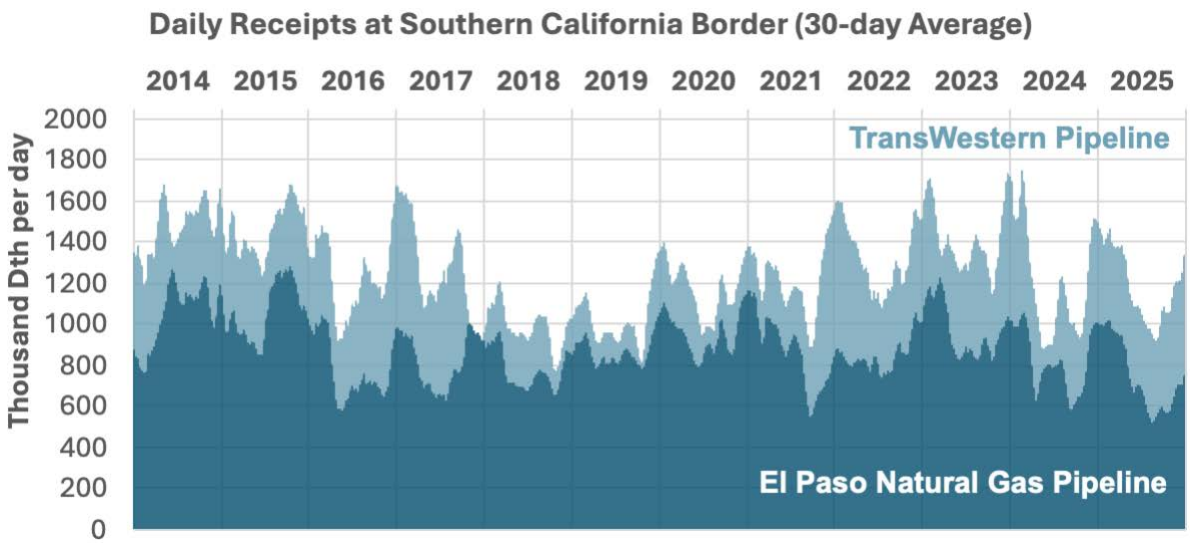
There are two major interstate pipeline systems in the Southwest region: the El Paso Natural Gas and TransWestern pipeline. The two pipeline systems deliver gas from the Permian and San Juan supply basins to end users in Arizona and New Mexico, as well as to the SoCalGas pipeline system at the California border.

To transport gas to natural gas power plants, electric utilities in the Southwest typically contract for "firm service" on the interstate pipeline systems. These contracts provide each utility with priority access to the pipeline to transport a prescribed daily volume of natural gas, typically sized by each utility to ensure it can adequately supply its portfolio of gas-fired resources. These arrangements allow utilities to ensure their natural gas resources can operate when needed for reliability.[13]

[13] In contrast, in regions where natural gas generators are not served under firm service – and rely on "interruptible service" instead – a lack of pipeline capacity and the corresponding inability to deliver natural gas to power plants has been identified as a major driver of reliability risk.

Ensuring resource adequacy in the region will require utilities to right-size their commitments for firm capacity on the pipeline system for their current and future natural gas needs. On today's system, utilities have limited flexibility to adjust their subscriptions: postings to the "Electronic Bulletin Boards" (EBB) on the two pipeline systems indicate that existing pipelines are nearly fully subscribed today. Further, despite its aggressive clean energy policies, the state of California has not observed a notable decline in its demand for natural gas, and the two pipeline systems continue to be utilized to transport high volumes of natural gas to the Southern California border (see Figure).

Figure 3-7. Daily natural gas receipts at the Southern California border from the two interstate pipeline systems in the Southwest



3.2.5. Climate Uncertainty & Extreme Weather

Concurrent with these changes to customer loads and energy supply, climate change is impacting weather system fundamentals, which has implications for electricity demand and resource availability. Scientific consensus, as captured in the Intergovernmental Panel on Climate Change's (IPCC) *Sixth Assessment Report*, concludes that:

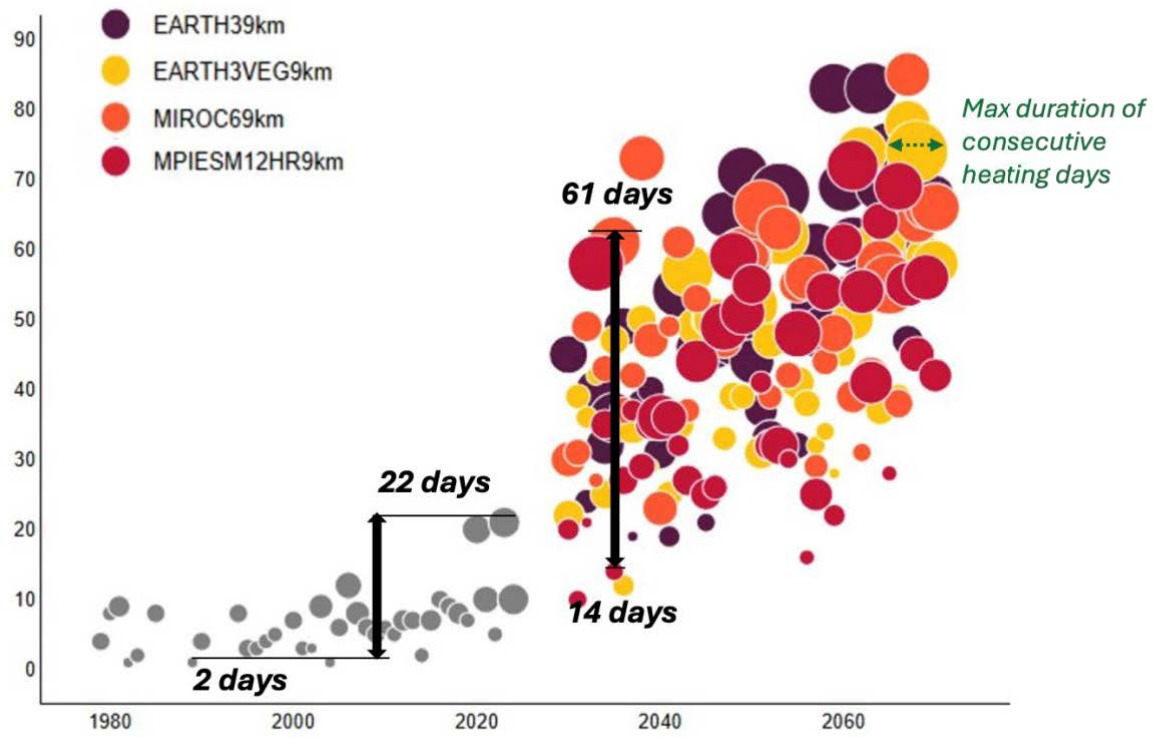
> "[g]lobal surface temperature will continue to increase until at least mid-century under all emissions scenarios considered. Global warming of 1.5°C and 2°C will be exceeded during the 21st century unless deep reductions in CO2 and other greenhouse gas emissions occur in the coming decades."[14]

The impacts of these global trends are far-reaching; the effects are expected to include "increases in the intensity and frequency of hot extremes, including heat waves (*very likely*), and heavy precipitation (*high confidence*), as well as agricultural and ecological droughts in some regions (*high confidence*)." Such increases appear across multiple General Circulation Models (GCM), often coupled with downscaling techniques to produce regional projections of future weather. Figure 3-8

[14] IPCC Sixth Assessment Report

compares the historical observed duration of summer heatwaves in the Southwest (defined as consecutive days reaching a temperature of 110 F or above in Phoenix) with projections of similar events for four GCM models (downscaled to the Southwest region). This comparison indicates both that (a) climate modeling indicates that the length of heatwave effects in the Southwest is expected to increase, while (b) there remains a significant degree of uncertainty – even in the near term – regarding the frequency and duration of temperature extremes.

Figure 3-8. Historical and projected frequencies of consecutive hot summer days (Phoenix temperature above 110F)



3.3. Best Practices for Resource Adequacy Planning

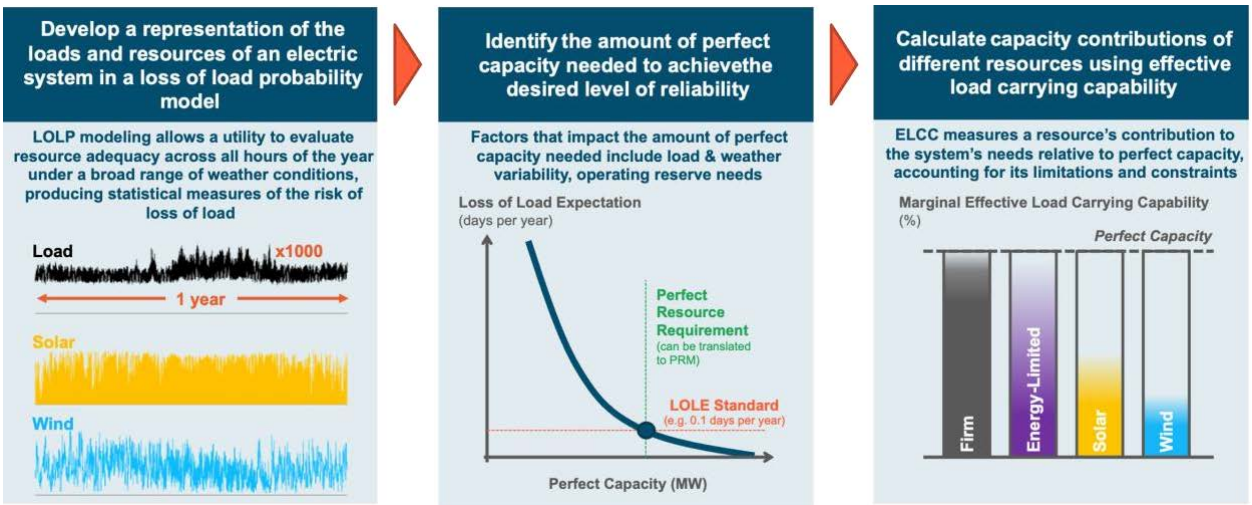
Planning a portfolio capable of serving loads across a wide range of potential conditions – despite the increasing complexity of the system, heightened levels of uncertainty, and the rapid pace of change – requires sophisticated analytical techniques to quantify the needs of the system, the availability of generation resources, and the resulting risks to reliability. The most widely accepted type of model for this type of analysis is **loss-of-load-probability (LOLP) modeling**, which relies on probabilistic and stochastic simulation techniques to evaluate resource adequacy across a broad range of possible conditions. In so doing, LOLP models identify the so-called **"critical periods"** in an electricity system: the conditions under which the system is most likely to experience resource deficiencies that may ultimately lead to the need to curtail firm electric load.

Designing the system to perform during these critical periods has always been the primary challenge of resource adequacy. Historically, those critical periods coincided almost exclusively with peak load, but increasingly, critical periods will occur at different times of day and year due to combinations of high load and low resource availability. The ability to identify such periods is foundational to all aspects of planning an adequate portfolio. At its most foundational level, a robust framework for resource adequacy requires three components:

1. Development of a **loss-of-load-probability model** that can simulate the availability of loads and resources on an hourly basis across a wide variety of weather conditions to identify periods in which an electricity system is vulnerable to reliability risks;
2. Derivation of a **total capacity requirement** that reflects the amount of "perfect capacity" needed to achieve an acceptable level of reliability (this is often subsequently translated into a **"planning reserve margin" requirement**); and
3. Application of an **effective load carrying capability (ELCC)** accounting framework to measure the contribution of each resource (or portfolio of resources) towards the total capacity requirement.

These best practices, summarized in Figure , guide the modeling approach used in both the near-term and long-term assessments to evaluate resource adequacy across the region.

Figure 3-9. Three foundational pillars underpinning a robust approach to resource adequacy



The 2021 study provides a more extensive description of resource adequacy best practices and their application, and most of the concepts and details remain equally useful today. Subsequent E3 publications, as well as a growing body of literature produced by others in the industry, continue to reaffirm the importance of a rigorous time-sequential LOLP modeling approach to evaluate resource adequacy. Key publications include:

- Redefining Resource Adequacy for Modern Power Systems (ESIG, 2021)[15]

[15] Available at: https://www.esig.energy/wp-content/uploads/2022/12/ESIG-Redefining-Resource-Adequacy-2021-b.pdf

- Resource Adequacy Philosophy: A Guide to Resource Adequacy Concepts and Approaches (EPRI, 2022)[16]
- Ensuring Efficient Reliability: New Design Principles for Capacity Accreditation (ESIG, 2023)[17]
- New Resource Adequacy Criteria for the Energy Transition: Modernizing Reliability Requirements (ESIG, 2024)[18]
- Resource Adequacy for a Decarbonized Future (EPRI, 2024)[19]
- Resource Adequacy for the Energy Transition: A Critical Periods Reliability Framework and its Applications in Planning and Markets (E3, 2025)[20]

Adoption of these best practices for resource adequacy planning is becoming increasingly common across the industry. In the Southwest, the current methods by the region's major utilities – the sponsors of this study – each have developed LOLP models of their system, have used those tools to derive PRM requirements based on statistical loss-of-load metrics, and have adopted ELCC as the primary method for resource accreditation.

[16] Available at: https://www.epri.com/research/products/000000003002024368
[17] Available at: https://www.esig.energy/wp-content/uploads/2023/02/ESIG-Design-principles-capacity-accreditation-report-2023.pdf
[18] Available at: https://www.esig.energy/wp-content/uploads/2024/03/ESIG-New-Criteria-Resource-Adequacy-report-2024a.pdf
[19] Available at: https://www.epri.com/research/products/3002027832
[20] Available at: https://www.ethree.com/wp-content/uploads/2025/08/E3_Critical-Periods-Reliability-Framework_White-Paper.pdf

4. Near-Term Resource Adequacy Assessment

The near-term resource adequacy assessment provides a comprehensive outlook for resource adequacy in the Desert Southwest region across the coming decade by applying the best practices described in Section 3. This section of the report presents the scope, the modeling approach, key inputs and assumptions, and technical results.

4.1. Scope of Analysis

Much like the 2021 study, the scope of the near-term assessment focuses on an evaluation of regional resource adequacy by aggregating load forecasts and resource portfolios provided by individual utilities to the regional level. Using loss-of-load-probability modeling, the analysis uses stochastic chronological simulations of loads and resources across the region. While the primary purpose of the near-term assessment is to evaluate whether utilities' plans will meet regional resource adequacy needs, the supporting analysis provides answers to a range of questions that establish a comprehensive outlook for regional resource adequacy:

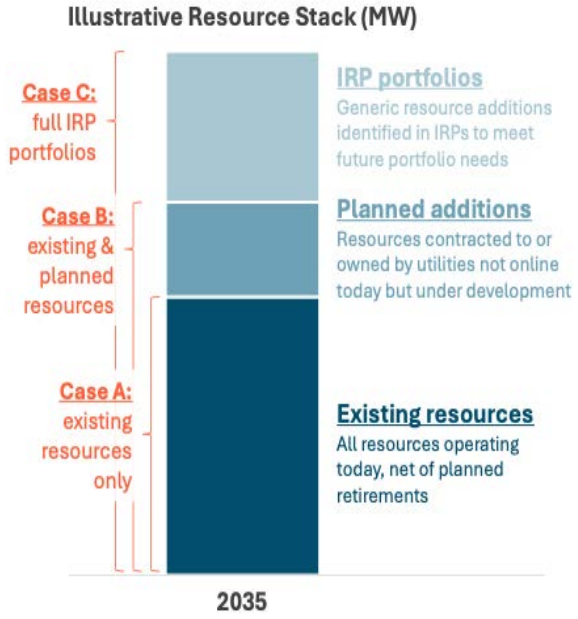
The near-term reliability outlook presented here uses load forecasts and resource portfolios provided by utilities in early 2025. Since that time, utilities have continued to update load forecasts and adjust resource plans in response to continuously changing conditions. For this reason, these results do not reflect the most current outlook for loads and resources within the region, but nonetheless serve as a useful directional indication of the relative scale of resource needs and provides validation that utility planning processes continue to identify resource portfolios capable of meeting regional reliability needs.

1. What is the current and future need for capacity in the Southwest region to maintain reliability across the region with a loss of load expectation of no more than 0.1 days per year ("one day in ten years")?
2. How much new effective capacity will be needed to ensure this level of reliability can be maintained?
3. To what extent will resources that are already under development today satisfy a portion of the need for new resources?
4. To what extent are utilities' resource plans positioned to meet regional resource adequacy needs?
5. How will resource adequacy risks evolve over the coming decade with anticipated changes in loads and resources?
6. How will the contributions of different technologies towards meeting the region's needs during the periods of greatest risk change?

To answer these questions, the near-term resource adequacy assessment includes the following analysis:

- Calculation of reliability statistics for three resource portfolios for each year from 2025-2035: (1) existing resources (net of retirements); (2) existing and in-development resources; and (3) full utility resource plans (see Figure 4-1);
- Close inspection of loss-of-load events observed in the simulations to provide insight into key drivers of reliability risk and the performance of different resources during critical risk periods;
- Evaluation of capacity credits for different technologies across the modeling horizon; and
- Sensitivity analysis on key uncertainties that could impact regional reliability.

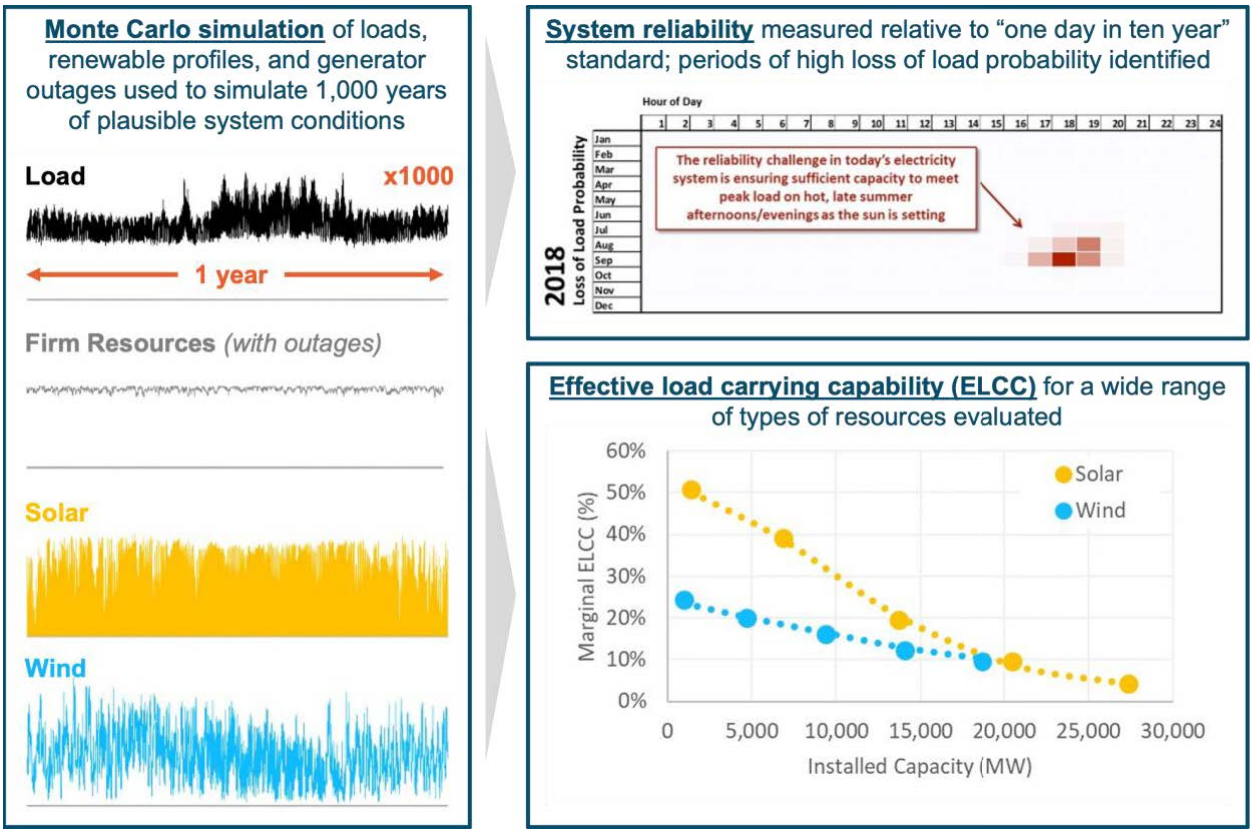
Figure 4-1. Three portfolios evaluated in near-term assessment



4.2. Modeling Approach

This phase of analysis utilizes **Renewable Energy Capacity Planning (RECAP)** model, developed and maintained by E3, to conduct LOLP modeling of the southwest region. RECAP simulates the availability of electric supply to meet demand across a broad range of conditions on a time-sequential basis, accounting for weather-driven variability of electric demand and weather-dependent resources like wind, solar, and hydro; power plant forced outages, and energy limitations and operating constraints for resources like storage and demand response. These simulations determine the likelihood and magnitude of loss of load – energy demand that cannot be served due to an insufficiency of capacity or energy – and provide the basis for calculating the PRM.

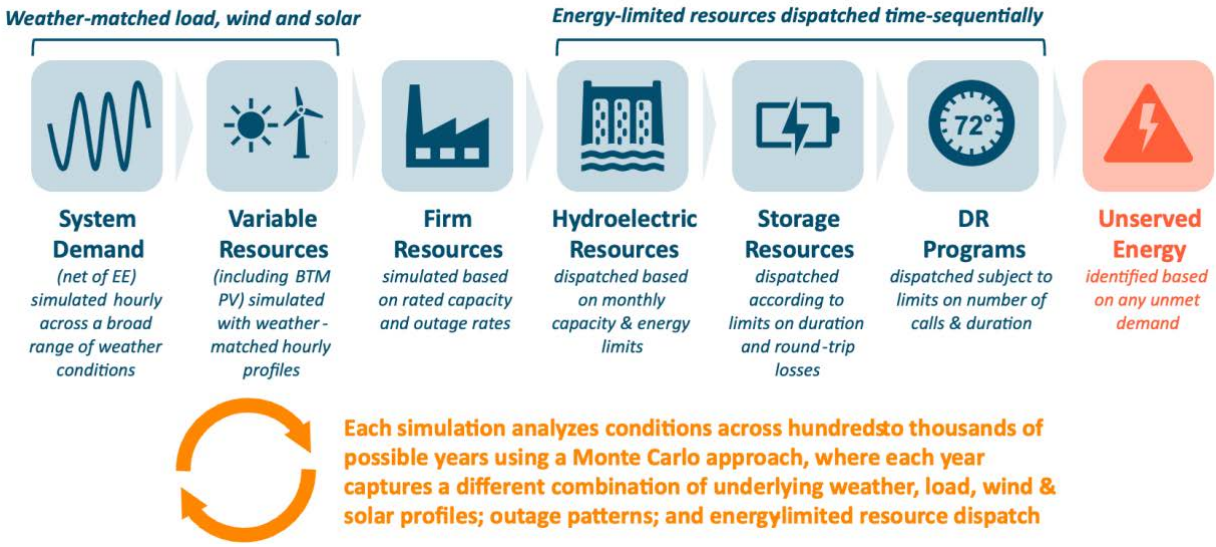
Figure 4-2. Overview of E3's RECAP model



RECAP simulates hundreds of "years" of potential conditions using stochastic techniques to appropriately capture the risk of tail events (e.g., higher load and lower renewable output than expected).[21] RECAP simulates balance between system demand and available generation in each hour of a year and repeats this process hundreds of times with different system conditions (see Figure). This ensures that RECAP captures a wide distribution of potential outcomes, including unlikely tail events that may not occur in a "typical" year. Relevant correlations are preserved within the model to ensure linkage among load, weather, and renewable generation conditions based on historical observations.

[21] In this approach, each "year" represents a different realization of conditions on the Southwest region over the course of a year. Factors that will vary from one "year" to the next include underlying weather patterns – and by extension, load and renewable profiles – power plant outages, and energy-limited resource dispatch.

Figure 4-3. RECAP simulation methodology



Through this simulation process, RECAP calculates the usual suite of statistical metrics produced in LOLP modeling to characterize the frequency, magnitude, and duration of potential reliability events (LOLE, LOLH, EUE, and others). Additionally, RECAP can be used to calculate common "derivative" metrics, including the planning reserve margin and ELCCs for individual resources.

4.3. Key Assumptions

Developing a representation of the Southwest region in an LOLP model requires a broad range of inputs to characterize the range of expected system demands and the capabilities of the available generating resources. The inputs and assumptions needed for this analysis are summarized in Table 4-1.

Table 4-1: Summary of key inputs for RECAP

Module	Inputs Needed
System Demand	• Annual energy demand • Annual 1-in-2 peak demand • Hourly profiles corresponding to a wide range of weather conditions (20+ years) • Minimum operating reserve requirements
Firm Resources *(e.g. nuclear, coal, gas, biomass, geothermal)*	• Seasonal capacity rating by resource • Forced outage rate by resource • Mean time to repair by resource
Variable Resources *(e.g. wind, solar)*	• Installed capacity by resource • Hourly profiles for multiple years, ideally including multiple years of overlap with hourly load profile data
Hydroelectric Resources	• Installed capacity by resource • Monthly/daily energy budgets across a range of plausible hydro conditions • Minimum output levels by month/day • Sustained peaking limitations by month/day
Storage Resources *(e.g. batteries, pumped storage)*	• Installed capacity by resource • Duration by resource • Charging & discharging efficiency by resource • Paired variable resource (for hybrids) • Interconnection configuration & rating (for hybrids)
Demand Response Resources	• Expected load impact by program • Limits on number of program calls (per year or per month) • Duration of calls

4.3.1. Demand Forecast

To produce a regional Southwest demand forecast, this study uses a bottom-up approach that involves three steps (see Figure 4-4): (1) collecting forecasts for annual energy demand from each participating utility and aggregating them to produce a regional forecast; (2) creating and applying hourly profiles for individual components of load to those annual demands in a manner that captures the seasonal and diurnal characteristics; and (3) aggregating the resulting shapes together to derive a total hourly load shape with a regional coincident peak demand. This section describes the demand forecast methodology in detail and the collaboration between E3 and the Southwest utilities.

Figure 4-4. Three-step process to develop hourly load inputs for resource adequacy modeling

Step 1: Develop Regional Energy Demand Forecast

As an input to this study, each sponsoring utility provided a demand forecast based on their outlook at the beginning of 2025. The total energy forecasts provided by utilities are segmented into the following categories:

- Existing end use demands, net of the projected impacts of incremental energy efficiency[22];
- Electric vehicle charging demands;
- New large customer demands; and
- Behind-the-meter solar generation (treated as a decrement to loads).

The total annual demand for electricity is determined by aggregating these utility-provided forecasts together and making an additional adjustment to account for the existing electric demands within the region that are not directly served by these utilities (typically small municipal utilities and cooperatives).

Step 2: Create and Apply Hourly Shapes

The segmentation described above allows the analysis to capture the impacts of these changing elements upon the regional shape of demand for electricity. Hourly shapes for each segment are developed using different approaches, summarized in Table 4-2.

Table 4-2. Description of load shaping approaches used for each segment

Load Segment	Load Shaping Approach
Existing End Use Demands	Neural network simulation over 45-year history (1970-2024) based on historical temperature (detrended for climate impacts) and electric demand data
Electric Vehicles	Hourly shape for a single year developed using E3's EVGrid modeling toolkit,[23] reflecting a combination of managed and unmanaged charging
New Large Customers	Hourly profile for a single year assuming 90% load factor and a daily shape that coincides with cooling demands (peaks in the day and lowers in the evenings).
Behind-the-Meter Solar PV	Hourly profiles simulated for 1998-2020 using NREL System Advisor Model based on representative locations across six major population centers

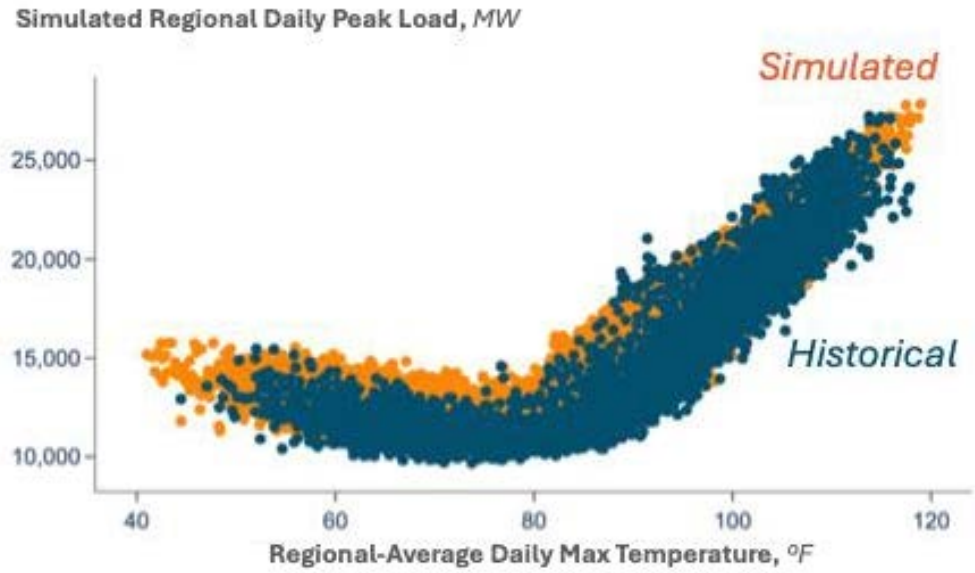
Among these four segments, the most important and consequential for the purposes of resource adequacy modeling the shape applied to existing end use demands, both because of their relative magnitude and sensitivity to extreme weather conditions. Robustly capturing the risks associated with extreme weather events that may not occur in a "typical" year requires development of demand shapes across a wide range of weather conditions. To create such a dataset, this study uses neural network regression techniques to simulate present-day electricity demands under an extended

[22] Energy efficiency forecast assumptions are provided by each sponsoring utility and is modeled as energy reduction in each hour across the entire year.

[23] For additional detail, see: https://www.ethree.com/tools/electric-vehicle-grid-impacts-model-2/

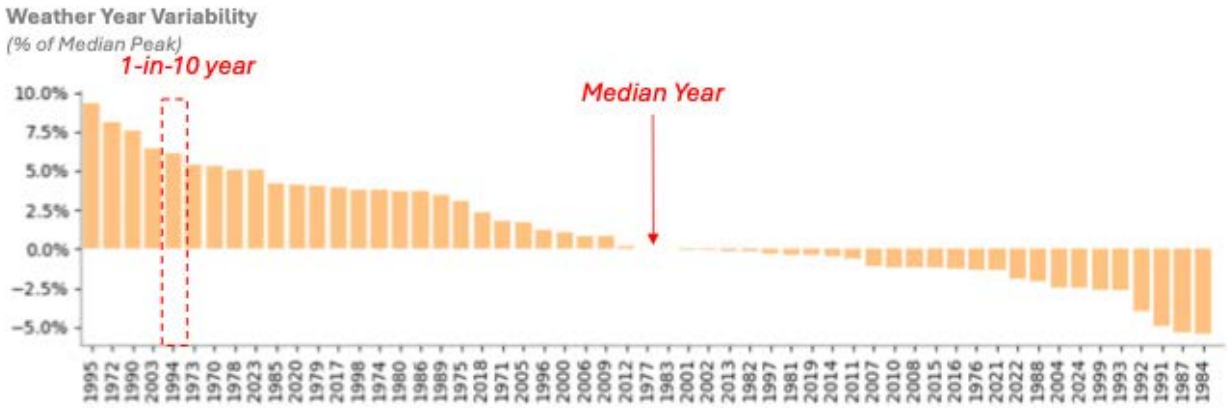
historical weather record.[24] This approach establishes a direct relationship between temperature at key population centers across the region and the corresponding electricity demand. This relationship is illustrated in Figure 4-5, which compares the 2024 actual daily peak and daily maximum temperatures against the simulated outputs from the neural network regression.

Figure 4-5. Historical and simulated weather and load data



Applying this to reanalysis weather data covering the period 1970-2024 produces a 45-year record of hourly demand shapes that reflects a range of typical, mild, and extreme weather conditions. Figure 4-6 represents the peak load variability observed across the 45 years ranked from highest annual peak load observed to the lowest.

Figure 4-6. Peak demand (relative to a "1-in-2" level) for each weather year simulated

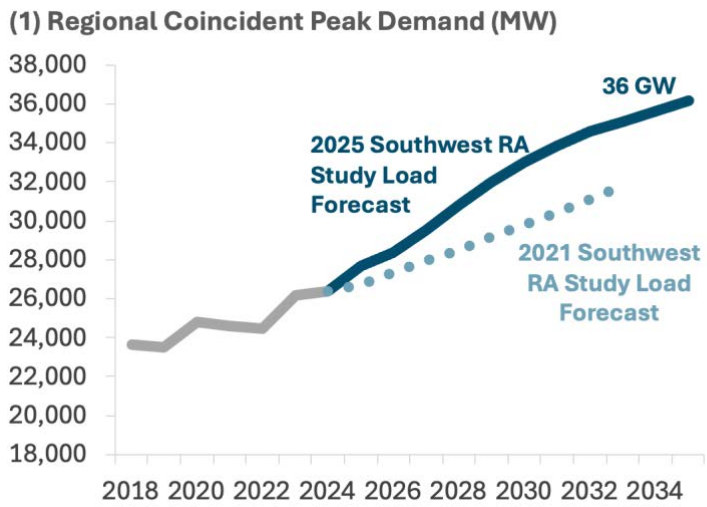


[24] The primary dataset used in this study is ERA5-LAND. As in the previous study, these historical temperature data have been "detrended" to account for the apparent underlying warming trends.

Step 3: Derive Regional Coincident Peak Demand Forecast

All the components described above are combined within RECAP to produce the total load for the Southwest. The resulting hourly profile produces a median peak load forecast for the region and produces a broader range of variability (representing 45 total weather years) needed for a robust assessment of resource adequacy. Figure 4-7 shows the peak load forecast for the full Southwest region present in this study. The figure also compares this study's peak load forecast compared to the 2021 study's peak load forecast. Between the two, the rate of growth is higher (2.7% per year in this study compared to 2.2% per year in the 2021 study).

Figure 4-7. Projected regional coincident peak demand based on utility forecasts



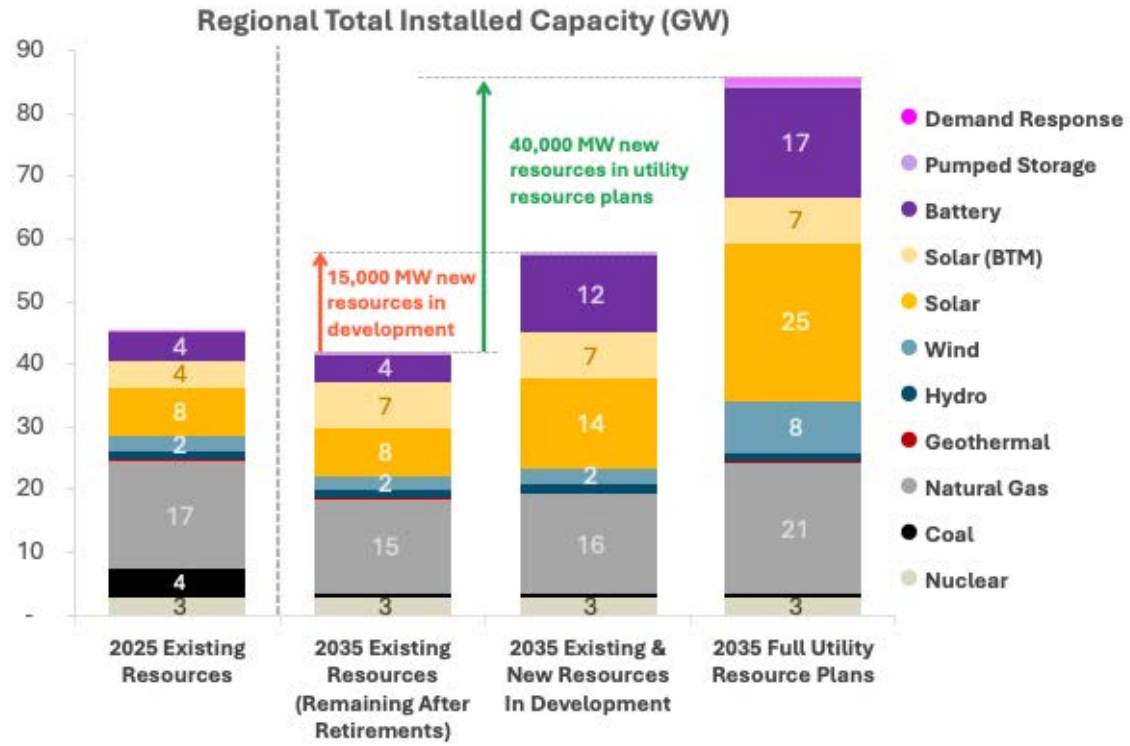
4.3.2. Resource Portfolios

Portfolios of electric generating resources analyzed for the near-term study are created through aggregation of resource data provided directly by the participating utilities. Over the course of the ten-year horizon, three portfolios are evaluated; each evaluation serves a specific purpose:

1. **Existing Resources Only (Remaining After Retirements):** how much additional effective capacity will be needed to meet load growth and replace retiring resources?
2. **Existing & New Resources in Development:** to what extent will resources already under development satisfy need for new capacity?
3. **Full Utility Resource Plans:** to what extent will utilities' resource plans, including generic future resource additions, enable the region to achieve an LOLE of 0.1 days per year or better (if successfully implemented)?

The installed capacity of existing resources in 2025, as well as for the three portfolios analyzed in 2035, are shown in Figure *4-8*.

Figure 4-8: Composition of resource portfolios evaluated in near-term assessment



In developing the portfolios for the purposes of this study, the utilities make several important underlying assumptions: first, that the transmission necessary to deliver new resources to loads is also constructed in a timely manner; and second, that the availability of natural gas transportation capability to serve the region's gas generators is not a constraint that limits their use. To the extent either or both of these preconditions are not met, the region may face additional resource adequacy risks not identified by the analysis in the near-term assessment, where these factors are not explicitly modeled.

The availability of each specific resource included in each portfolio is represented in RECAP's stochastic simulations in a manner that reflects its characteristics and limitations, which generally vary by technology. The key factors that constrain each resource's availability, and the basis for assumptions used in this study, are provided in Table 4-3.

Table 4-3. Overview of data development process and availability representation of different technologies in study

Technology	Data Development and Availability Representation
Nuclear	• Maximum capacity varies seasonally with summer & winter capacity ratings provided by utilities • Random forced outages simulated stochastically based on plant-specific rates provided by utilities
Coal	
Natural Gas	
Geothermal	• Maximum capacity specified by plant
Hydro [25]	• Monthly maximum capacity and energy budgets provided by WAPA for five hydro scenarios • Hydro scenarios modeled stochastically based on probabilities provided by WAPA • Hydro resources dispatched to flatten net load, subject to operating constraints
Wind	• Site-specific hourly profiles simulated from meteorological and turbine power data gathered from NREL's WIND Toolkit for the historical period 2007-2012
Solar	• Site-specific hourly profiles simulated using NREL's System Advisor Model (SAM) for the historical period 1998-2022
Battery Storage	• Dispatched to minimize loss of load, subject to capacity and energy limitations (and interconnection limitations for hybrid facilities) • Random forced outages simulated stochastically using a generic 5% outage assumption
Pumped Storage	
Demand Response	• Maximum capacity varies seasonally with summer & winter capacity ratings provided by utilities

[25] Represents large reservoir projects managed by Western Area Power Administration (WAPA). Pumped Storage Hydro would be considered as Storage.

4.4. Results

4.4.1. Regional Planning Reserve Margin (PRM)

As discussed in Section 3.3, one of the key components in the RA planning framework is to measure the total capacity need needed to achieve a one-day-in-ten-year loss of load expectation (0.1 LOLE) target. Under the load and resource assumptions in this study, maintaining a LOLE of 0.1 days per year in the Southwest requires a 12-13% PRM, expressed as the amount of perfect or effective capacity needed above the median peak load. This result is a direct output of the RECAP model that quantifies the quantity of perfect capacity in MW that is necessary to achieve the reliability target. Dividing this megawatt value by the 1-in-2 peak demand and subtracting one yields the percentage PRM requirement. Table 4-4 illustrates the relationship between the 1-in-2 peak, the total capacity need, and the resulting perfect capacity PRM.

Between 2025 and 2032, the region's 1-in-2 peak grows from 27,666, MW to 31,800 MW; meeting regional needs according to a 0.1 LOLE reliability target in 2032 requires 12-13% reserve margin (31,143 and 38,672 MW of effective capacity for 2025 and 2032 respectively).

While the absolute quantity of capacity needed grows, the relative requirement remains relatively stable and is consistent with the level of planning reserves identified in the 2021 study. The stability of this planning reserve margin throughout the horizon and across studies holds true because the amount of effective capacity needed is independent of the resources in the portfolio: "need" is calculated in a manner that only reflects the nature of electricity demand and operating reserves across all hours of the year.

Table 4-4. Planning reserve margin values for 2025 and 2032

	Peak Load (MW)	Total Capacity Need (MW)	Perfect Capacity PRM (%)
2025	27,666	31,143	13%
2032	34,564	38,672	12%

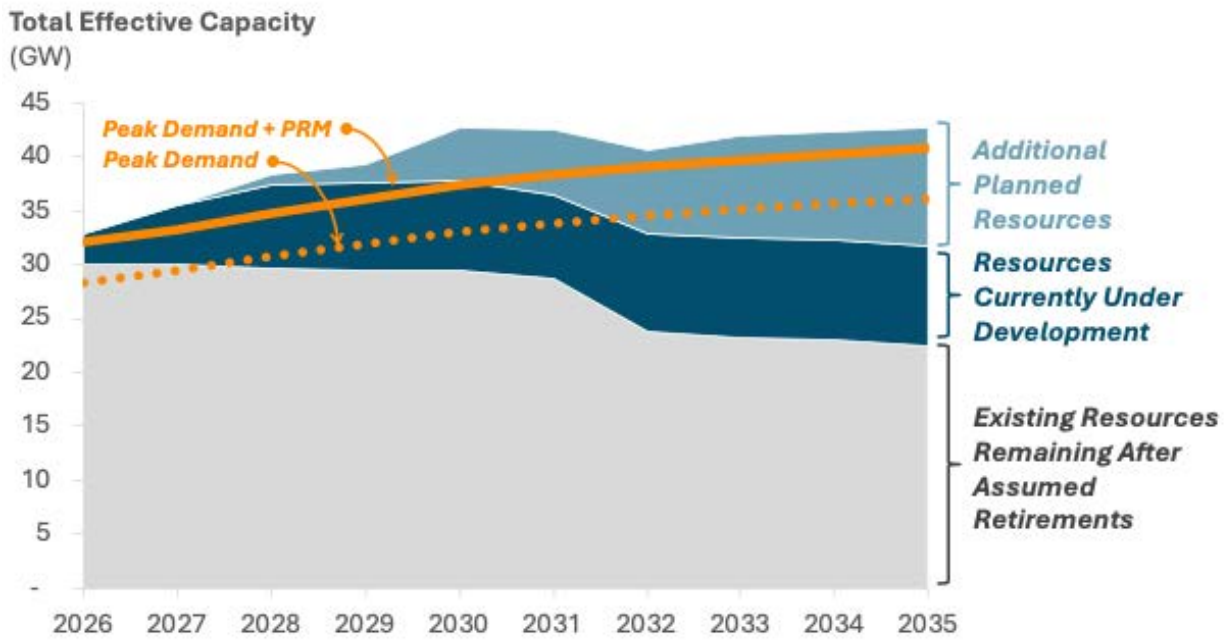
4.4.2. Outlook for Regional Load-Resource Balance

Figure shows the projected load-resource balance for the region based upon the load forecast and resource portfolio assumed used in this study. The figure highlights the increasing regional capacity needs with growing loads and the effective capacity provided by existing resources, resources under development, and generic resources included in utility plans.

- Over the next decade, the aggregated demand forecasts provided by utilities increase by 30%, or a total of over 8,000 MW. Incorporating a planning reserve margin of 13%, load growth increases the regional need for effective capacity by nearly 10,000 MW.

- At the same time, the retirements and expiring contracts of coal and natural gas plants assumed in this study result in the loss of approximately 8,000 MW of effective capacity.
- In conjunction, these two factors create a need for 18,000 MW of new effective capacity over the course of the next decade to maintain regional resource adequacy needs.
- Resources currently under development are poised to meet a portion of those needs, providing just over 9,000 MW of effective capacity and positioning the region to maintain load resource balance over the next several years.
- The additional generic resources included in utility plans are sufficient to close the remaining gap, creating some headroom in advance of planned resource retirements and satisfying the need for new capacity over the coming decade.

Figure 4-9. Projected regional load-resource balance based on utility plans current as of Q1 2025



While the rate of load growth and resource additions have both increased since the publication of the 2021 study, the overall balance of loads and resources ten years into the future remains similar: both the 2021 study and this study show a small margin of capacity above the minimum quantity needed to maintain a regional LOLE of 0.1 days per year. The implication of this consistency is that utilities' updates to their plans in response to accelerating load growth have identified solutions to preserve regional resource adequacy, despite the increasing complexity of the resource mix.

While the presence of a sustained resource deficit would be cause for concern – an indication that the physical limitations of the resources utilities plans would not allow the region to achieve an LOLE of 0.1 days per year – the presence of a margin of surplus does not necessarily indicate that utilities are planning to procure excess capacity due to a variety of factors not explicitly captured in this analysis:

- This analysis treats the region as a "copper sheet" with no internal transmission constraints, allowing resources located anywhere in the region to contribute to meeting all loads. Constraints on the transmission system may limit utilities' ability to utilize resources in this manner.
- This analysis assumes full fuel availability for gas, nuclear, and other fuel-burning resources in the region. Lack of supply in the regional fuel delivery system during critical periods may disrupt utilities' ability to generate power to meet the region's reliability needs.
- The analysis assumes that the dispatch of energy-limited resources (storage, hydro, and demand response) is perfectly orchestrated to maximize their value to regional resource adequacy; in reality, the dispatch of these resources may not align with these patterns due to utility-specific operational choices, market rules and processes, and imperfect information sharing. This, in turn, could result in tighter market conditions than simulated in this study.
- While this analysis adjusts the historical weather record to account for the past warming trends observed, it does not account for potential future load shape changes due to increased warming over the next decade. Increased frequency and severity of extreme heat events could place additional strain on resource adequacy. This risk is explored in several of the sensitivities presented in Section 4.4.5.

Further, while this analysis models resource adequacy at a regional level, the responsibility to ensure resource adequacy remains a utility function, not a regional one. Each individual utility establishes its own reliability target, evaluates the ability of resources to contribute to their own needs, and makes assumptions about the availability of "market support" from neighboring utilities based on their own independent assessment of risk. This approach is inherently unlikely to capture the full value of potential load and resource diversity across the region but remains the de facto method through which resource adequacy is planned and evaluated.

4.4.3. Evolving Drivers of Reliability Risk

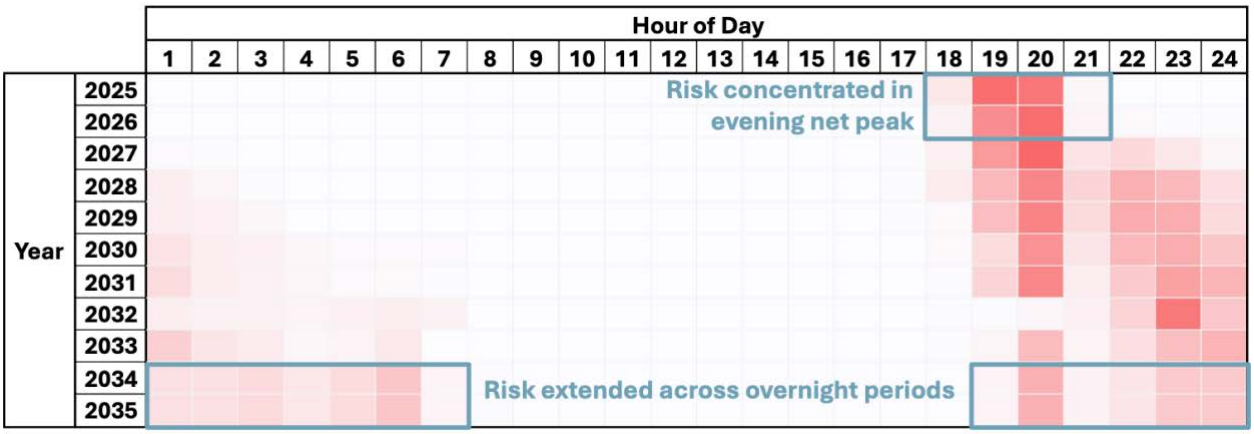
Utilities' plans include significant quantities of renewables and storage resources to help meet regional resource adequacy needs over the next decade: roughly half of the 2035 need for effective capacity is provided by firm resources, while the other half is provided by variable and energy-limited resources. As utilities add increasing quantities of renewables and storage, the periods of highest risk migrate from the afternoon peak periods to other times of the day. This transition is already underway, and will continue over the course of the next decade:

- Historically, the periods of greatest reliability risk occurred during peak demand conditions. In a system of predominantly firm resources, meeting the highest loads of the year – typically on the hottest summer afternoons – required the most generation capacity.
- Today, extreme summer days continue to drive the region's risk, but the timing of risk within the day has shifted due to the higher penetration of solar resources. Since the 2022 Study, the Southwest utility-scale solar fleet has increased from roughly 3 GW to 8 GW. With more solar output during the gross peak load period, today's risk has shifted to evening periods, 6-8pm.

- As the solar and storage additions continue, risk will shift deeper into the evening and nighttime hours. This continued transition is a reflection of the system becoming increasingly "energy constrained," as the greatest reliability risks occur during the periods when storage resources are most likely to be depleted after discharging during the evening.

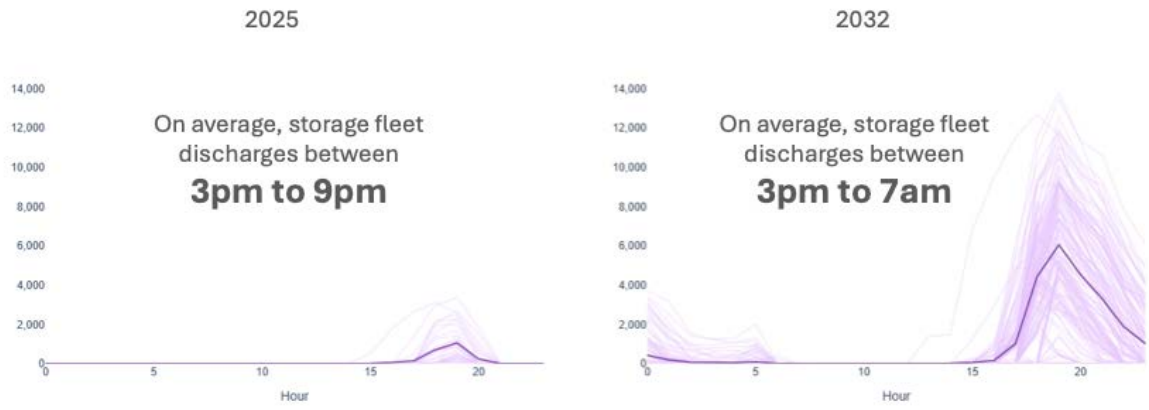
This progressive shift of loss-of-load risk deeper into the overnight period is shown in Figure 4-10 below, which illustrates how the year-by-year changes to loads and resources impact when loss-of-load is most likely to occur. All observed events occur in the summer season.

Figure 4-10. Progression of average loss-of-load risk by hour of the day, 2025 to 2035



The observed shifting of risk from the afternoon into the evening is a direct result of the increasing penetration of solar resources due to the well-documented "net peak." The subsequent extension of risk into overnight periods is a natural result of the increasing penetration of storage resources: at low penetrations, storage resources discharge during finite, short windows during the net peak period, but at higher penetrations, the discharge window for storage resources extends across broader periods as they serve a larger portion of loads. This contrast is shown in Figure 4-11, which contrasts summer discharge patterns for a small portfolio of storage resources in 2025 (roughly 4,000 MW) with a much larger one in 2032 (over 16,000 MW). As the discharge window for storage resources lengthens, the finite amount of energy stored is more likely to be exhausted.

Figure 4-11. Comparison of storage dispatch patterns to maintain reliability in 2025 and 2032

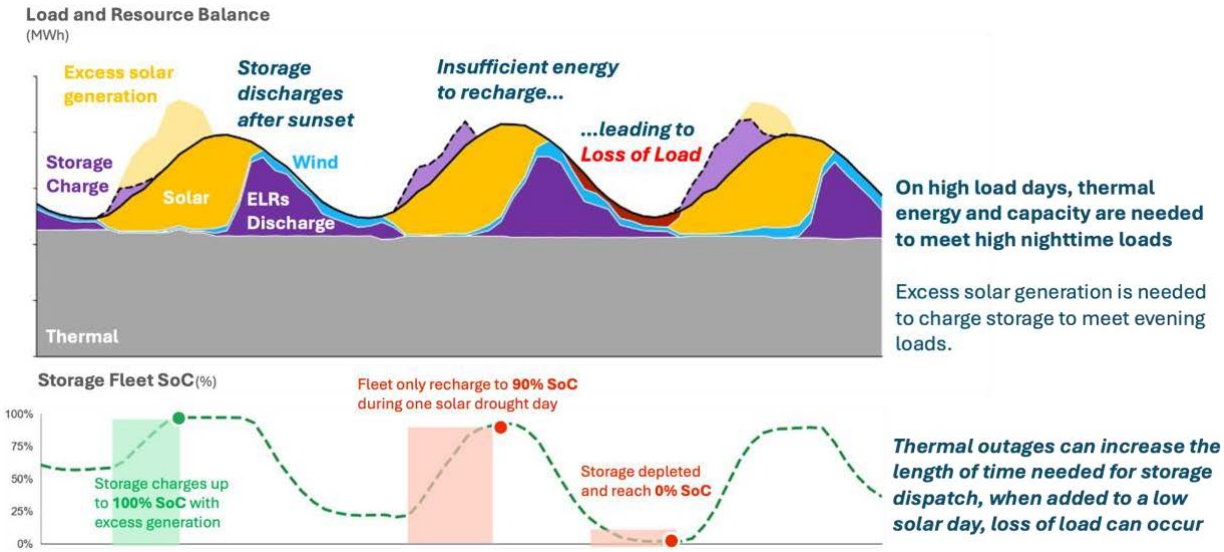


As the nature of loss-of-load risk shifts from periods when the instantaneous generating capacity is insufficient to serve loads to periods following the depletion of energy-limited resources, the system transitions from being "capacity-constrained" to "energy-constrained." Figure 4-12, based on the modeling of 2035 utility plans, provides a specific example of how the depletion of storage state-of-charge across multiple days could eventually culminate in a longer loss of load event during the early morning hours.

- On the first day of the event, storage resources reach full state of charge during daylight hours; during the evening period, they are dispatched during the evening and overnight periods and reach a minimum state of charge of roughly 20%.
- During the subsequent day, the available surplus energy is insufficient for storage resources to fully recharge, and the fleet only reaches 90%.
- As a result, the region's storage resources are fully depleted over the course of the next overnight period, and a loss-of-load event begins in the late evening hours and extends through the full overnight period until the next morning.

This event reflects an energy, rather than a capacity limitation, as the depletion of storage state of charge immediately precedes the realization of loss of load. Importantly, an additional MWh of generation (or a corresponding reduction of load) at any point in time from the late evening of day one to the early morning of day three would have directly reduced the size of this loss of load event.

Figure 4-12. Example of storage depletion in RECAP leading to an "energy-constrained" loss-of-load event



4.4.4. Resource Accreditation

The changing timing of critical periods is intrinsically linked to the capacity value that different types of resources provide to the system. The contribution of each technology to the system, measured using marginal ELCC, provides a direct relative measure of how much each resource contributes to resource adequacy at the margin. Changes to the marginal ELCC from 2025 to 2035, for each technology, are shown in Table 4-5. Technologies are subdivided into three categories (firm, variable, and energy-limited), a schema that groups together resources with similar characteristics and limitations.

- Firm resources (nuclear, coal, natural gas, and geothermal), which can generate electricity at or near maximum capacity for as long as necessary (except when experiencing an outage), exhibit high marginal ELCCs and are not subject to saturation. Differences in their relative ELCCs are primarily a function of outage rates.
- Variable resources (solar, wind), whose output varies from hour to hour as a function of uncontrollable meteorological conditions, exhibit low marginal ELCCs, reflecting the fact that during critical periods, their output is likely to be significantly lower than their full capacity. The marginal capacity value of solar in the Southwest, in particular, is very low (under 10%) due to the fact that critical periods occur during the evening.
- Energy-limited resources (storage, demand response), which have intrinsic finite limitations on the duration of their operations, exhibit high marginal ELCCs at low penetrations (when the system is capacity-constrained) but low marginal ELCCs at higher penetrations (when the system is energy-constrained). These saturation effects are observed across technologies: for instance, the significant increase in storage penetration from 2025 to 2035 drives a reduction in the marginal ELCC of both storage and demand response.

Table 4-5. Marginal ELCCs by technology in 2025 and 2035

Category	Technology	2025	2035	Change
Firm	Nuclear	94%	92%	-2%
	Coal	82%	-	-
	Natural Gas	91%	93%	+2%
	Geothermal	90%	88%	-2%
Variable	Solar	5%	7%	+2%
	Wind	26%	21%	-5%
Energy Limited	Hydro	73%	73%	-
	Battery	93%	36%	-57%
	DR	87%	38%	-49%

4.4.5. Sensitivity Analysis Results

Beyond understanding the reliability risk from the expected future regional portfolios, this study explores a range of potential risks to the region. These sensitivities on the regional resource adequacy risks tests the impact on the capacity position based on changes in resource performance, peak load uncertainty, and changes to the region's thermal portfolio composition.

The sensitivities are designed to capture emerging resource adequacy challenges facing the energy industry. Increasing frequency of extreme weather has led to increased forced outage risk to all resources and increased observed load. In addition, large load additions are accelerating the need for capacity and energy across the industry. Table 4-6 describes each sensitivity tested.

For resources, this study applies increased resource risks to the region's natural gas and storage resource fleet, two resources the region currently and will rely on to meet reliability risk. For storage, additional energy degradation sensitivities are applied. This study also studies the effect of low water availability under drought conditions for the region's hydro resources.

For load, the recent heatwaves in the Southwest 2023 and 2024 resulted in consecutive high load days. This sensitivity captures the increased frequency of extreme weather, testing the region's adequacy under the assumption that the 1-in-5 peak becomes the normal conditions. This study also focuses on the increased risk, but also capacity value, of data centers. This sensitivity looks at the risk associated with an accelerated timeline and the value of load flexibility.

A few themes emerge across the sensitivities:

1. Higher resource forced outage rates increases the risk to the region. By 2032, the natural gas fleet continues to serve as the region's main resource during the critical periods. Doubling the gas forced outage rate reduces the position by 968 effective MW in ELCC. Similar results

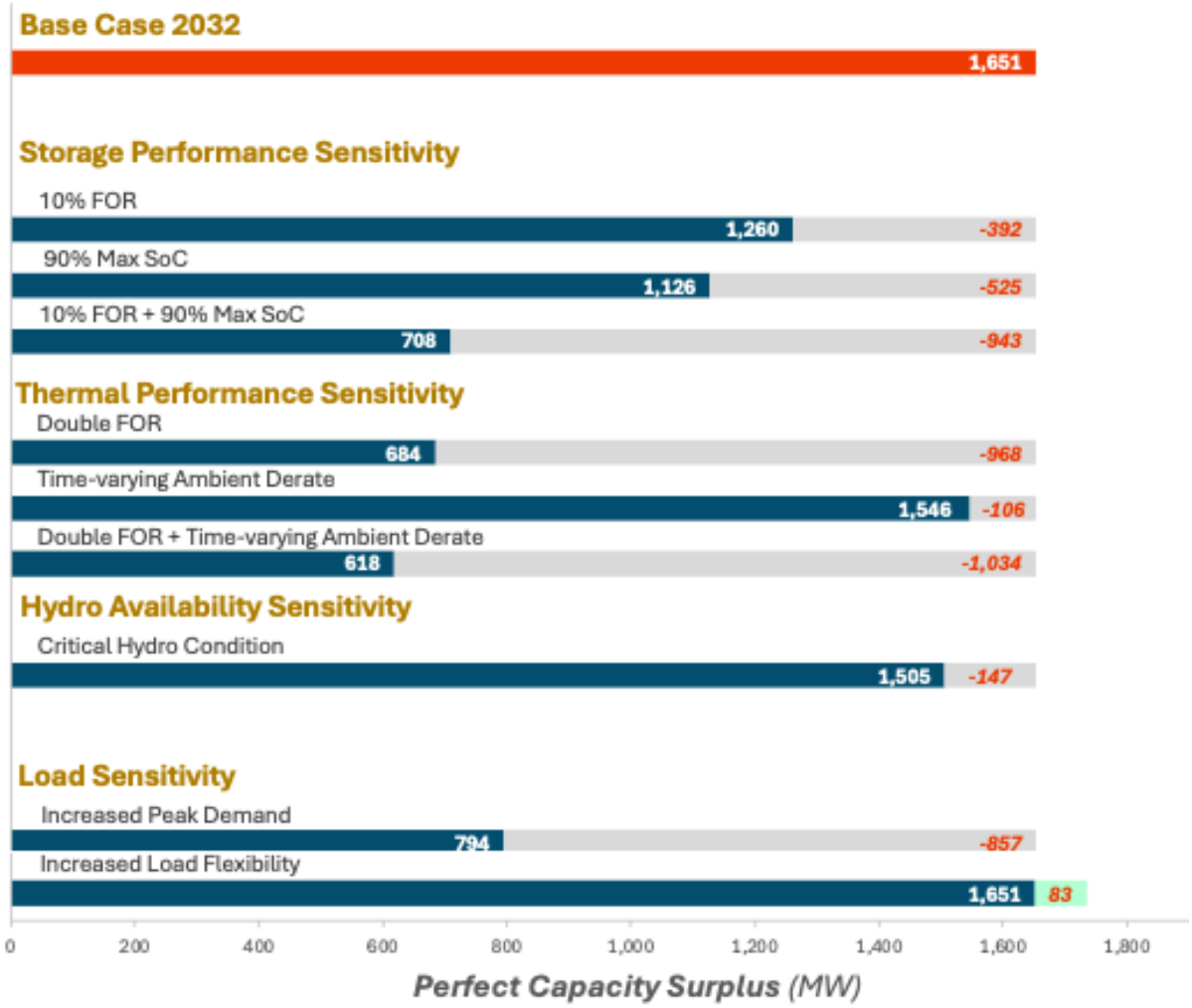
are observed for storage but compounds when the region's fleet increases in outage frequency and has 10% less energy, exacerbating the energy-deficiency problem.

2. Increased frequency of extreme weather (1-in-5 weather conditions) led to an increase in 857 MW higher capacity needs, equivalent to 2.4% of the median peak. Load flexibility can help mitigate some of increased load, but the impacts are lower than the incremental load added to the system.

Table 4-6. Range of 2032 Sensitivities

Category		Sensitivity Case	Description
Thermal Performance	A	Higher Gas Outages Rate	**Double all gas plants FOR** to reflect greater thermal stress from rising summer temperatures and more frequent winter cold weather disruptions
	B	Higher Ambient Derate	**Derate gas fleet summer rating by 5%** to reflect reduced output during long-lasting heat wave conditions
	C	Combine A & B	
Storage Performance	D	Higher Storage Outages	**Increase storage FOR assumptions from 5% to 10%** to account for potential battery performance degradation due to extreme temperatures
	E	Accelerated Battery Degradation	**Reduce storage maximum State-of-Charge from 100% to 90%** to reflect performance degradation due to capacity fading during extended heating events
	F	Combine D & E	
Hydro Availability	G	Critical Hydro Condition	**Assume critical drought conditions** to stress-test hydro energy availability
Load Requirements	H	Increased Median Peak	**Scale weather years so that median peak demand represents a 1-in-5 weather year** to reflect more challenging planning conditions
	I	Increased load flexibility	**Assume load components can achieve higher level of flexibility** during periods of grid stress

Figure 4-13. Achieved 2032 Capacity Position Across Various Sensitivities.



4.5. Discussion

The region faces a substantial and growing need for new capacity in the coming decade, and utilities' resource plans have identified portfolios capable of meeting that need. Regional coincident peak demand is projected to grow by roughly 30% over the next decade while assumed retirements remove nearly 8,000 MW of effective capacity from the existing portfolio. Taken together, the region's total need for new capacity grows to approximately 18,000 MW of new effective capacity by 2035.

Utilities' current plans, which include over 40,000 MW of new nameplate capacity, are projected to close this gap and maintain regional reliability at or better than the 0.1 days per year LOLE target, provided resources are brought online according to planned schedules.

The growing share of non-firm resources in the portfolio, projected to account for roughly half of total effective capacity by 2035, is shifting the timing of reliability risk away from the traditional afternoon peak and into the late evening and overnight hours. This effect is already observable today and is

expected to intensify as storage penetration increases, with elevated overnight risk potentially emerging as soon as 2027.

This shift has direct implications for resource accreditation: marginal solar contributes relatively little to reliability at current penetration levels (5 to 7% ELCC), and the capacity value of 4-hour storage is projected to decline from approximately 90% in 2025 to 38% by 2035. These dynamics reinforce the continued importance of firm resources, which can generate on demand across extended periods when renewables and storage may be unavailable or depleted. Today, the viable options are limited and remains largely natural gas and nuclear.

Achieving the scale of development called for in utility plans will require adding over 4,000 MW of new capacity per year. The sensitivity analysis confirms that even modest delays in resource development or further upward load revisions could tighten the regional load-resource balance materially.

While the near-term assessment provides a focused evaluation of whether today's utility plans are sufficient to maintain reliability through 2035, it does not address the longer-term question of what features and characteristics of resource portfolios are able to meet long-term reliability needs. Section 5 builds on this foundation by examining a range of portfolios capable of meeting regional resource adequacy needs through 2045, exploring how the dynamics observed in the near term evolve at higher penetrations of renewables and storage and across a broader range of load, technology scenarios, and energy mixes.

5. Long-Term Resource Adequacy Assessment

5.1. Scope of Analysis

Whereas the near-term assessment focuses on the question of whether utilities' plans will maintain resource adequacy over the next ten years, the long-term assessment explores a broader question: what are the features and characteristics of resource portfolios capable of meeting long-term resource adequacy needs? Over a time span that extends beyond some utilities' planning horizon, key uncertainties impacting need are magnified, and the range of possible pathways to meet resource adequacy needs expands. Therefore, rather than focusing on evaluation of a single portfolio, the long-term assessment examines a range of potential portfolios. The long-term assessment utilizes a combination of **long-term capacity expansion (LTCE)** and **LOLP modeling** to design and evaluate twenty-three plausible portfolios that satisfy regional needs by 2045. Each portfolio is created based on a unique combination of the following three variables:

- **Demand Forecast:** three different levels of long-term load growth (Reference, Low, and High);
- **Technology Set:** four different options for the combinations of technologies available to meet incremental needs (Existing Technologies Only, Existing and Emerging Technologies, Existing and No New Gas, and Existing and Emerging, but No New Gas)
- **Clean Energy Penetration:** five different levels of energy mixes, defined using the penetration of clean energy ranging from 60% to 95%, measured based on the percentage of annual energy needs served by carbon free resources.[26]

The twenty-three combinations of these variables that are explored in this assessment are shown in Table 5-1. For each case, LTCE and LOLP models are used together to identify a least-cost portfolio of resources to meet regional resource adequacy needs, subject to specified requirements for the generation mix.

[26] The different clean energy penetrations are a key study design element and does not reflect the region nor any individual utility's goals. Changing the clean energy penetrations allows the study to explore common and uncommon patterns across a broader range of possible future portfolios and energy mixes.

Table 5-1. Twenty-three portfolios created and evaluated in for long-term assessment

Load Forecast	Technology Set	Clean Energy Penetration (% of Energy)				
		60%	70%	80%	90%	95%
Reference	**Existing**	●	●	●	●	●
Low	Existing	●	●	●	●	●
High	Existing	●	●	●	●	●
Reference	Existing & Emerging	●	●	●	●	●
Reference	Existing (No New Gas)					●
High	Existing & Emerging					●
High	Existing (No New Gas)					●

Each combination of these assumptions evaluated in this study is intended to represent a hypothetical long-term portfolio, rather than as a predictive or prescriptive outcome for the region. None of these portfolios are directly representative of current utility plans and no single portfolio developed herein is intended to reflect any sort of preferred or recommended regional resource plan, however all portfolios must achieve a target LOLE of 0.1. By doing so, the twenty-three portfolios studied – together, as a set – establish long-term ranges to bound the needs for specific types of resources; illuminate tradeoffs between different types of resources; and provide a basis for identifying common themes that are applicable across a wide range of potential outcomes.

5.2. Modeling Approach

The long-term assessment relies on a three-step modeling process to generate and evaluate future system portfolios and performance:

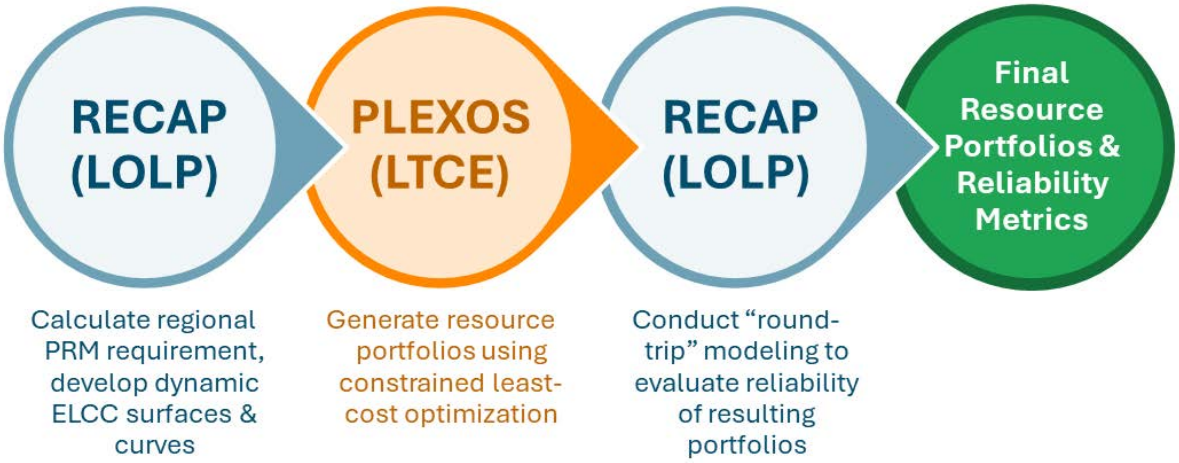
- First, a regional PRM requirement and ELCC curves for new resources are developed using RECAP to conduct LOLP analysis. This analysis builds directly on the datasets generated in the near-term analysis.
- Second, PLEXOS[27] is used to conduct long-term capacity expansion modeling for each of the scenarios defined above. The PRM requirement and ELCC curves derived in the prior step serve as direct inputs into the LTCE modeling, where they are used to define constraints that ensure that sufficient resources are developed to meet regional resource adequacy needs.

[27] More information about the PLEXOS LT model is available on the Energy Exemplar website (https://www.energyexemplar.com/plexos).

- Third, the resulting portfolios are provided back to RECAP, where "round-trip" resource adequacy analysis is conducted to ensure that the level of observed reliability of the portfolio does not deviate substantially from the specified target and to allow for a deeper inspection of the reliability risks present in each one.

This three-step process, illustrated in Figure 5-1, provides the most comprehensive framework through which to evaluate the resource adequacy and drivers of risk present in a portfolio.

Figure 5-1. Three-step modeling process to generate and evaluate portfolios to meet long-term resource adequacy needs

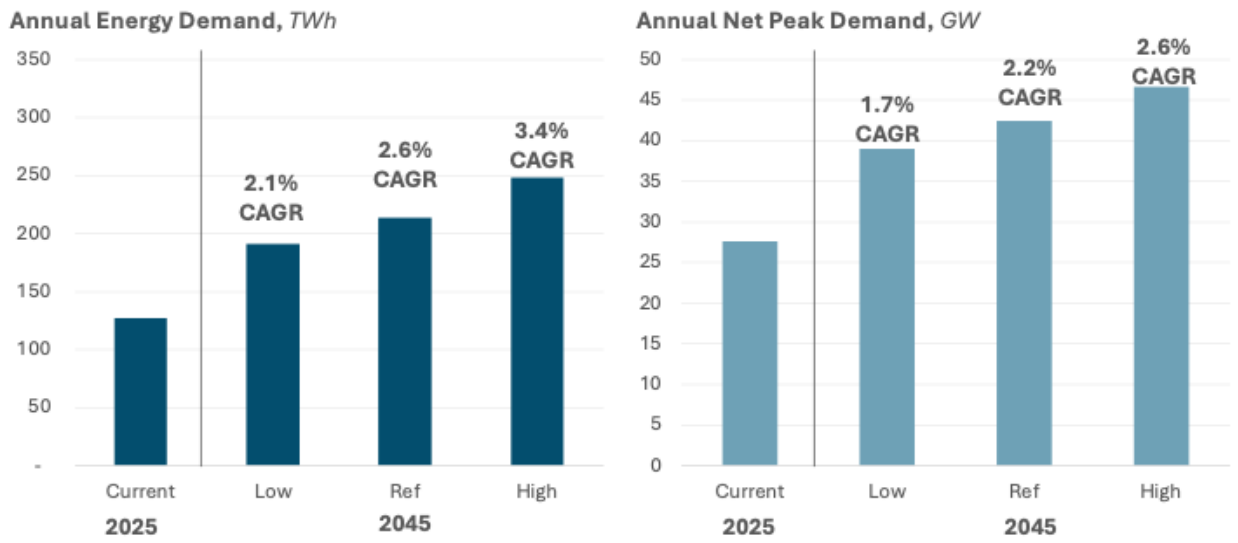


5.3. Key Assumptions

5.3.1. Long-Term Load Forecasts

This study explores the hypothetical portfolios across three load forecasts: Reference, Low, and High. The Reference load forecast represents a continuation of expected growth in the region across all the major load components. For each component, E3 used the 2030-2035 compound annual growth rate from the Phase 1 forecast as the Reference load growth expectation out to 2045. The Low load forecast represents a return to load growth seen earlier in the decade. For baseline and large load customer components, the growth is halved and the adoption of electric vehicles also slows down. The High load forecast represents continued base load growth and accelerated growth of electric vehicles and large loads. Figure 5-2 shows the 2025 annual energy demand and the 2045 coincident peak demand. While both energy and peak demands grow between 2025, the total net energy demand grows at a faster rate relative to net peak demand due to the increase in large loads. These loads are assumed to have a 90% load factor, higher than the existing load factor of around 50%.

Figure 5-2. Southwest 2045 Net Annual Energy (TWh) and Net Coincident Peak (GW)



Across each of the load forecast, continued adoption of energy efficiency and behind-the-meter solar are projected out based on observations from the near-term analysis. For demand response, this study assumes a 5% of peak penetration of demand response is present across each portfolio.

5.3.2. Existing Resource Portfolio

The long-term analysis builds upon the resource portfolio data provided by the utilities for the near-term assessment. The long-term assessment includes the resources identified in the "2035 Existing and New Resources in Development" portfolio, shown in Figure *4-8*, with select modifications:

- Additional planned retirements (roughly 2,000 MW of existing natural gas capacity) between 2035 and 2045 reduce the capacity of the existing natural gas resource portfolio;
- Existing capacity of solar and storage resources are reduced as existing contracts roll off between 2035 and 2045; and
- The Harquahala natural gas plant, currently under utility contract that will soon expire, is assumed to remain in service over the analysis horizon.

These resources are used to populate PLEXOS with an initial regional resource portfolio.

5.3.3. Resource Expansion Options

PLEXOS LT identifies new resources to meet growing loads in two snapshot years: 2035 and 2045. The candidate resources described hereafter represent the menu of new resource options available in PLEXOS. Resource options are classified as either (a) commercially available or (b) emerging technologies; the former are considered as options in all cases (except where expressly prohibited), while the latter are included as options only in 2045 under the "Emerging Technology" sensitivities. The resource options considered are listed in Table 5-2. Resource options available in PLEXOS.

Table 5-2. Resource options available in PLEXOS

Commercially Available (All Cases)	Emerging Technology (Select Cases)
Solar (Arizona & New Mexico options)	Generic Storage (8hr)
Wind (Arizona & New Mexico options)	Generic Storage (12hr)
Natural Gas Combined Cycle	Generic Storage (100hr)
Natural Gas Combustion Turbine	Nuclear Small Modular Reactor (SMR)
Lithium-Ion Battery (4hr)	Enhanced Geothermal System (EGS)

Resource costs were based on the National Renewable Energy Laboratory's Mid Annual Technology Baseline and adjusted to reflect geography and expected market conditions in 2035. Many of the key near-term market trends driving investment decisions in 2026 have a lesser role to play in 2035. Key modeling assumptions include the sunset of current federal tariff impacts by 2030, expiration of solar and wind tax credits before 2030 (in line with the July 2025 budget reconciliation bill), ineligibility of battery storage for investment tax credits due to foreign content-based eligibility restrictions in current federal policy, and short-term gas turbine scarcity premiums that are assumed to normalize by 2035. Emerging technology options are assumed to be available beyond 2040. The following table shows 2045 capital costs and levelized fixed costs (including capital, financing, and fixed O&M costs) for candidate resources.

Table 5-3. Southwest 2045 capital and levelized fixed cost assumption for candidate resources (nominal $)[28]

Technology	Classification	Overnight Capital Costs ($/kW)	Levelized Fixed Cost ($/kW-yr)
Solar	Commercial	$1,776	$140
Wind	Commercial	$2,811	$223
Gas - CT	Commercial	$3,523	$299
Gas - CCGT	Commercial	$4,032	$323
Li-ion Battery (4-hr)	Commercial	$2,506	$233
Nuclear Small Modular Reactor	Emerging	$13,161	$1,271
Enhanced Geothermal System	Emerging	$16,668	$1,739
LDES (8-hr)	Emerging	$4,321	$402
LDES (12-hr)	Emerging	$8,714	$989
LDES (100-hr)	Emerging	$8,506	$965

[28] Resource costs are based on E3's RECOST model and assumptions used specific to the Southwest. For more information on E3's RECOST methodology, please refer to E3 website

New candidate wind and solar generators are subject to additional costs to capture the cost of transmission required to deliver renewable generation to load areas. Wind and solar resources incur two transmission-related costs: a system-level transmission cost representing an increase in transmission headroom required for new generation and an interconnection cost reflecting the cost to connect each individual plant to the bulk electric system.

New gas CT and CCGT resources include both the capital cost for power generation and incremental gas transportation cost adder. The adder reflects the need to secure additional firm fuel deliverability. The adder assumes existing regional gas pipeline capacity is fully subscribed and that new gas resources would need to procure incremental firm transportation rights or equivalent pipeline capacity service. The adder excludes operational fuel costs, which are modeled separately in capacity expansion, and should not double count any transportation, basis, or delivery costs already embedded in fuel price assumptions.

5.3.1. Effective Load Carrying Capability (ELCC) Assumptions

This study uses the planning reserve margin (PRM) and effective load carrying capability (ELCC) methodology to measure the contribution of different types of resources to the total resource adequacy need. Using the RECAP LOLP model developed in the near-term assessment, the long-term assessment incorporates dynamic ELCC curves and surfaces for variable and energy-limited resources to account for their changing contributions as a function of penetration. The ELCC curves used in the long-term assessment reflect resource additions relative to the “Existing & Planned” portfolio and are derived by adapting the model used in the near-term assessment to reflect projected 2045 loads. Examples of the curves produced from this exercise that are input into PLEXOS are shown below, illustrating how:

- The capacity value of incremental wind resources begins at a moderate level (30%) but declines as the proportion of wind in the portfolio increases;
- The capacity value of additional storage resources begins relatively high (80+%) but declines as the system becomes increasingly energy constrained; and
- The rate at which storage capacity value declines depends upon the penetration of additional solar; because solar and storage resources complement one another, higher penetrations of solar slow the declining marginal ELCC of storage.

Figure 5-3: Incremental Wind Capacity Value and Incremental ELCC

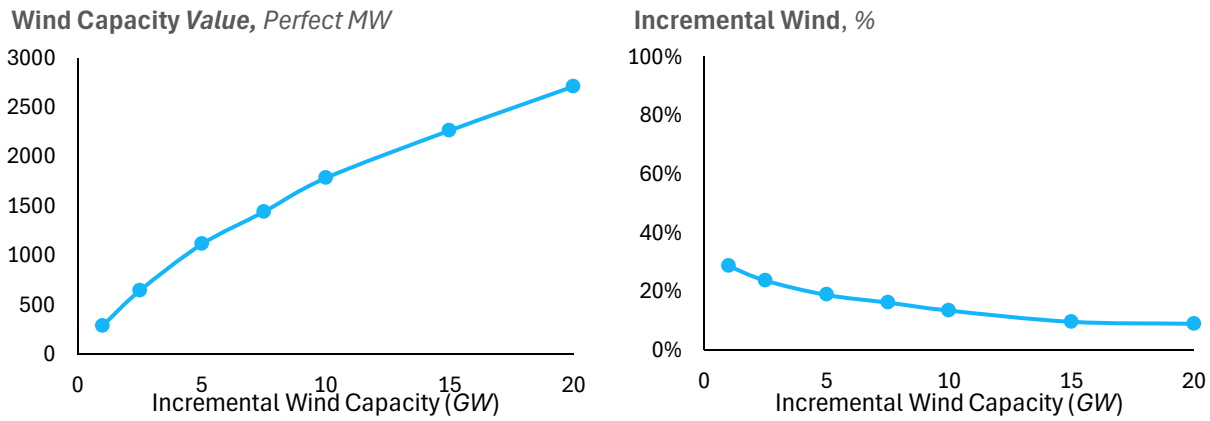
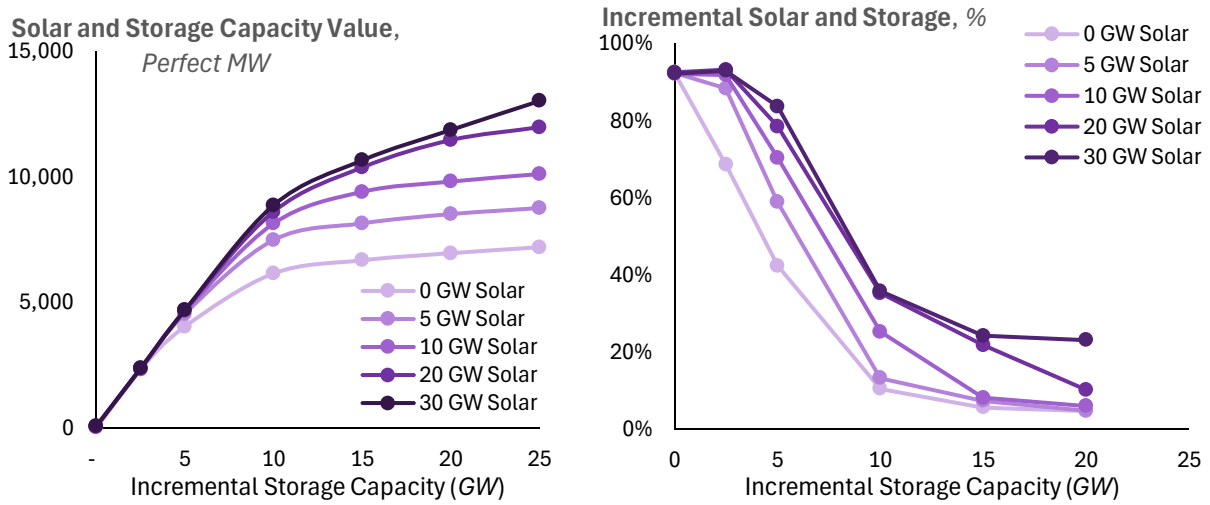


Figure 5-4: Incremental Solar and Storage Capacity Value and Incremental ELCC

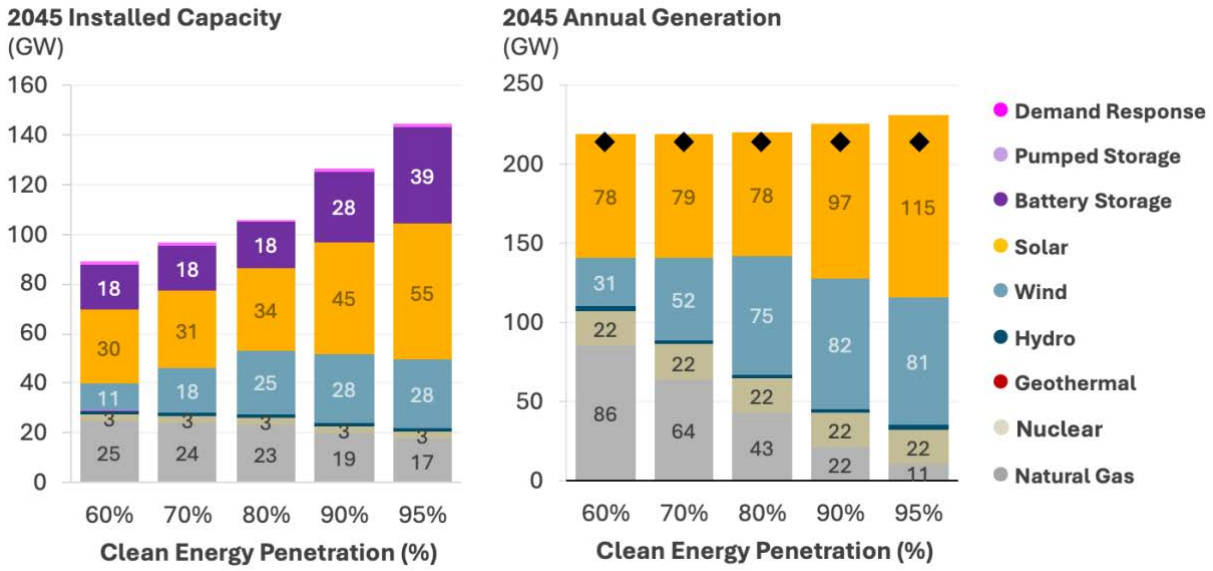


5.4. Results

5.4.1. Resource Portfolios

The installed capacity and annual generation by resource type for five portfolios spanning clean energy penetrations from 60 to 95% under the Reference load forecast are shown in Figure 5-5. This collection of portfolios, each designed to meet a regional resource adequacy target of 0.1 days per year, shows a range of plausible energy mixes while meeting long-term energy and resource adequacy needs in the Southwest region.

Figure 5-5. Installed capacity and annual generation mix at different clean energy penetrations, Reference load forecast



Several observations can be made across these portfolios:

- Of the five portfolios, four (60-90% Clean Energy) produce LOLE results that achieve or are below the 0.1 days per year LOLE target.
- While the specific quantities vary, all portfolios meet regional resource adequacy needs with a diverse mix of firm (gas and nuclear), renewable (wind and solar), and energy-limited (storage, DR, and hydro) resources.
- The differences in capacity among portfolios provides a measure of the relative effectiveness firm, variable, and energy-limited resources in contributing to resource adequacy needs: from 60 to 95%, the total quantity of incremental renewables (+42 GW) and storage (+21 GW) is nearly eight times greater than the quantity of natural gas resources displaced (-8 GW).
- While the share of the energy mix served by natural gas decreases in inverse proportion to the penetration of clean energy resources, the amount of installed capacity needed to maintain reliability does not exhibit the same decline. Even in a 95% clean energy portfolio where natural gas accounts for only 5% of annual energy, the installed capacity of natural gas resources (17 GW) is roughly 40% of the system peak demand.

More detailed reliability statistics for each of these portfolios are reported in Table 5-4.

Table 5-4. Reliability statistics for portfolios spanning 60 to 90% Clean Energy penetration

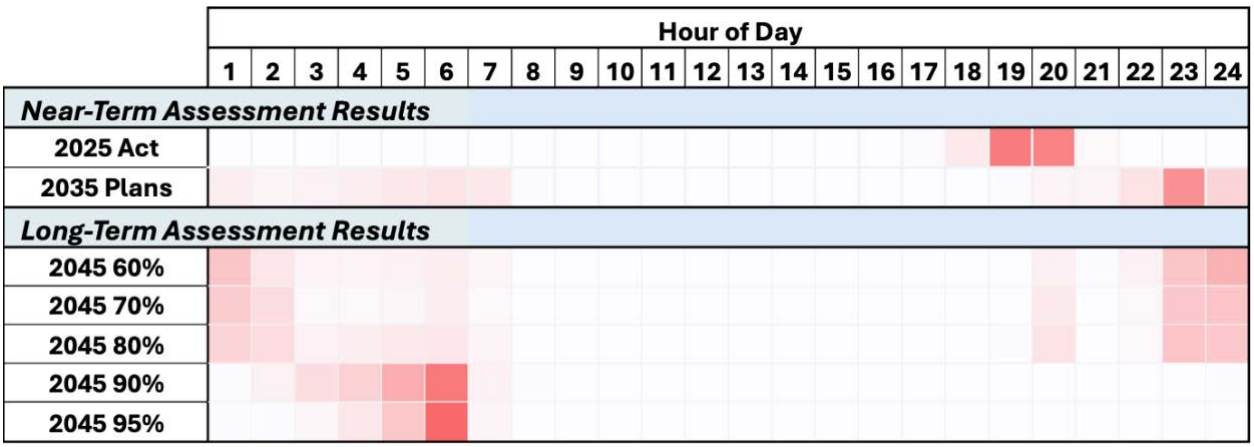
Portfolio	Loss of Load Expectation (days/yr)	Expected Unserved Energy (MWh)	Loss of Load Hours (hrs/yr)
60% Clean Energy	0.11	237	0.21
70% Clean Energy	0.11	220	0.19
80% Clean Energy	0.08	190	0.15
90% Clean Energy	0.07	158	0.15
95% Clean Energy	0.01	21	0.01

5.4.2. Drivers of Reliability Risk

Beyond 2035, the timing and nature of potential reliability risks will continue to evolve as a function of continuing changes to the resource mix. Figure 5-6 shows the timing of loss-of-load risk for each of the five portfolios discussed above (compared against results from the near-term assessment). This figure shows that:

- Because all long-term portfolios include a substantial quantity of solar and storage resources, all five experience loss-of-load risk in the evening and overnight periods.
- The risk profiles for the 60%, 70%, and 80% portfolios are similar in nature to the observed patterns in the utilities' 2035 plans: the periods of highest risk occur around midnight – when load not yet reached its overnight lows and storage resources begin to reach exhaustion – but also stretches into the early morning hours.
- In the 90% and 95% portfolios, the higher penetrations of storage resources cause risk to shift even further into the early morning period, and the timing of greatest risk can occur any time between sundown and sunrise – when load is beginning to increase but storage resources have not yet had a chance to recharge after discharging overnight.

Figure 5-6. Comparison of risk patterns observed in near- and long-term assessments



Across the range of portfolios, this study further investigates what types of factors are most likely to lead to these types of loss-of-load events in each portfolio, focusing on four main potential drivers:

1. High load, extreme summer days,
2. Coincident thermal forced outage conditions
3. Consecutive moderate or below average solar output days,
4. Insufficient stored energy in energy-limited resource fleet.

While all futures experience some form of these drivers, emphasis is different depending on the portfolio composition. Optimized portfolios with higher thermal capacity are more capable of covering high load, non-solar periods, provided expected performance from each power plant. Meeting nighttime reliability will increasingly depend on the availability individual units, something Southwest utilities are acutely aware of today. However, other resources must also perform well during these same periods

While high solar availability and output tend to correlate with high load days, even a few days of average or below-average solar performance ahead of heatwaves results in energy deficiencies in 2045. In all futures observed, solar installed capacity penetration is 75% of peak or higher, effectively meeting midday demand across all futures. However, consecutive days of low solar output reduce the effectiveness of other resources that rely on its energy, namely charging storage and deferring output until nighttime.

By 2045, storage, hydro, and on rare occasions, demand response, is dispatched during nighttime hours, provided it has sufficient energy available. If the preceding hours have ample solar generation, storage and hydro output can be delayed until after sunset. If the preceding hours have below-average solar output, the residual demand increases the pressure for the dispatchable resources to fill the void. During rare days of high load combined with lower-than-normal solar availability, reliability outcomes are primarily driven by lower solar availability.

5.4.3. Relative Portfolio Costs

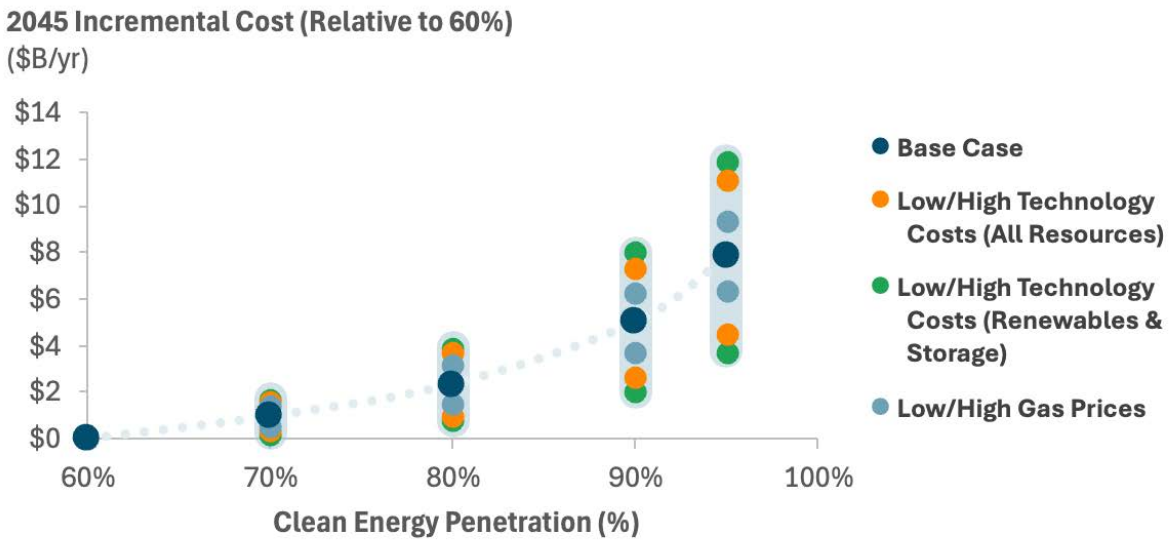
While cost is not a primary focus of this assessment, capacity expansion modeling provides useful directional information on the relative costs of different portfolios since it identifies least-cost resource portfolios subject to the specified constraints. Because the major drivers of scenario costs – the physical costs of the resources, supporting transmission infrastructure, and the fuel costs to operate them – are all highly uncertain across a twenty-year planning horizon, relative costs among the scenarios are shown for five sets of assumptions:

- Using E3's "Base Case" cost trajectories for resource, fuel, and transmission costs, which were the basis of the least-cost optimization in PLEXOS;
- Under alternative "high" and "low" technology cost assumptions (+/-20% relative to mid), applied to all resource and transmission investments;
- Under alternative "high" and "low" technology cost assumptions (+/-20%), applied only to renewable and storage resources; and
- Under alternative "high" and "low" natural gas price forecasts (+/-50%).

The sensitivities on resource, transmission, and fuel costs are inherently generic by design, intended to illustrate the relative relationships among the different contributing factors to portfolio costs. The resulting ranges of portfolio costs, measured relative to the 60% Clean Energy portfolio, are shown in Figure 5-7. These results inform three useful insights:

- Under "Base Case" cost assumptions, portfolios with higher clean energy penetrations have higher costs than portfolios with lower clean energy penetration.
- The costs of increasing clean energy penetration grow at an increasing rate (reflected by the exponential shape of the curves), a reflection of the declining value of renewables and energy storage at higher penetrations.
- Under certain alternative sensitivities (low renewables & storage costs, high natural gas prices), the costs observed in the 70% and 80% Clean Energy portfolios are not materially higher than the 60% Clean Energy portfolio, indicating that economic fundamentals alone may be one factor that could lead utilities to portfolios with higher clean energy penetrations.

Figure 5-7. 2045 incremental system costs, compared to 60% Clean Energy portfolio (nominal $)



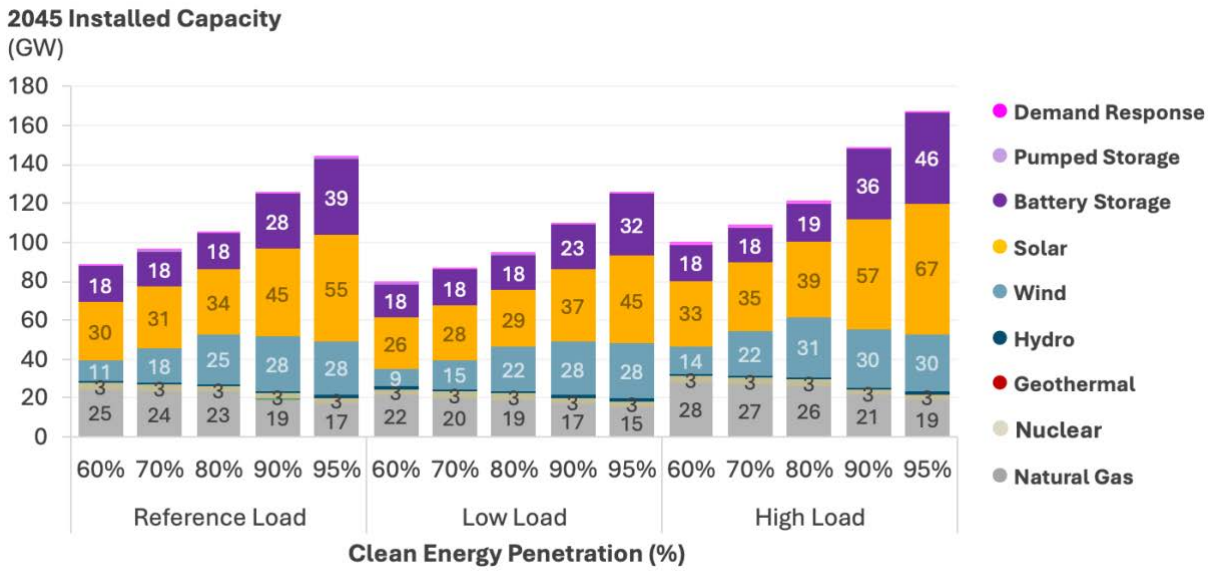
5.4.4. Portfolio Sensitivity Analysis

5.4.4.1. Load Forecast Sensitivities

To explore how load forecast uncertainty impacts the long-term regional resource needs for resource adequacy, additional sets of portfolios are created under alternative Low and High load forecasts. Figure 5-8 compares the resulting ranges of portfolios (which also span clean energy penetrations from 60 to 95%) against the results in the Reference load forecast. While the magnitude of total resource needs to ensure reliability differs across load forecasts, the resulting portfolios are similar in more ways than they are different:

- All portfolios require significant additions of new generation infrastructure relative to today's system. Even the portfolio with the lowest total quantity of resources (60% clean, low load forecast) requires roughly 50 GW of new installed capacity, more than the total capacity of the existing system today.
- All portfolios meet reliability needs with a complementary blend of firm, variable, and energy storage resources.
- All portfolios include new natural gas additions to meet a portion of long-term resource adequacy needs, and fourteen of the fifteen portfolios include gas additions beyond the resources currently under development (the lone exception is the 95% Clean Energy, Low Load portfolio).

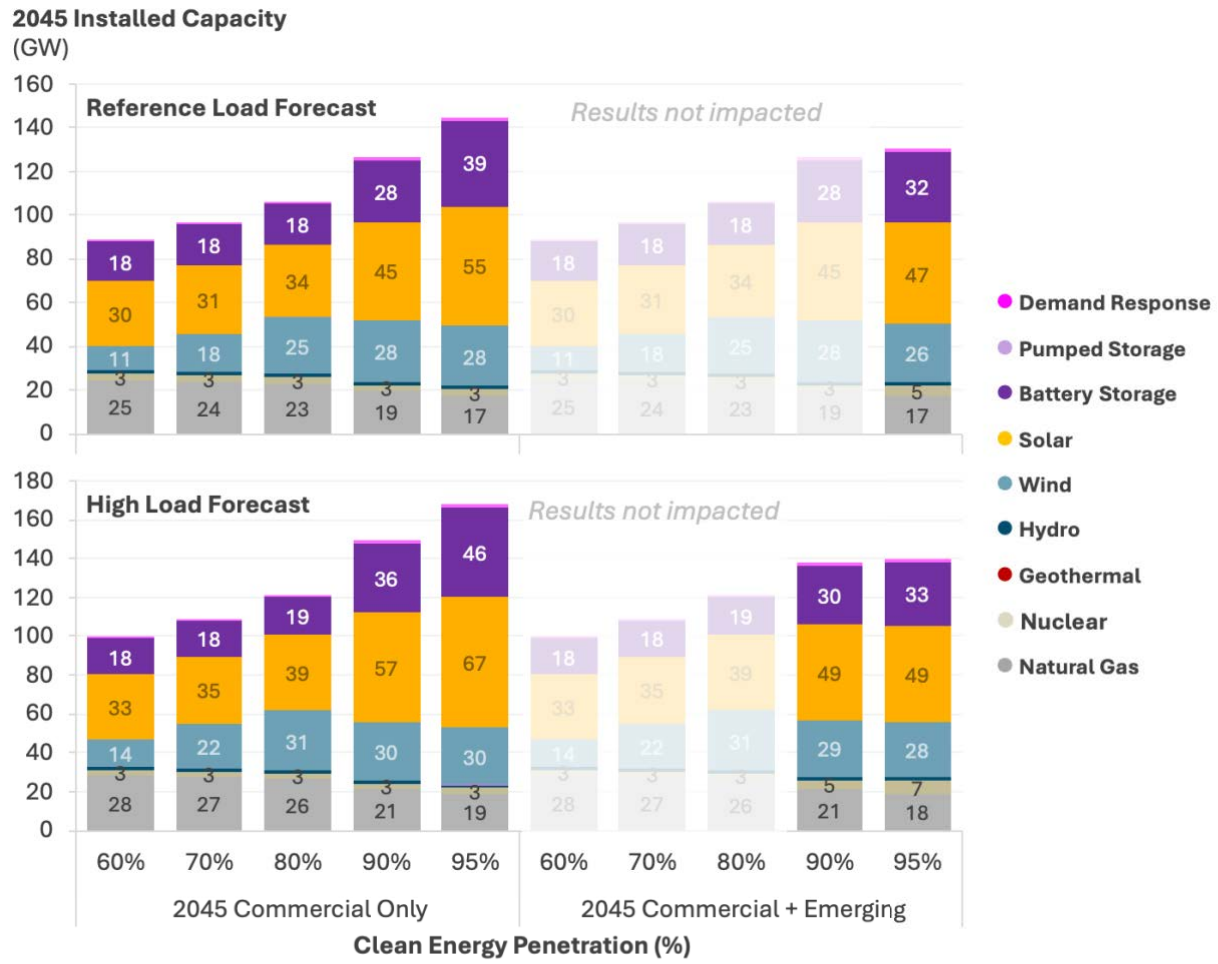
Figure 5-8. Installed capacity by technology under Low, Reference, and High load forecasts



5.4.4.2. Emerging Technology Sensitivities

The Reference and High Load cases are modeled with under a sensitivity where emerging technologies described in Section 5.3.3 are available for selection in 2045; these results highlight the potential value of additional resource options. Figure 5-9 compares the installed capacity of portfolios with commercial resources only to their counterparts where emerging technologies are allowed for the Reference Load forecast (top) and High Load forecast (bottom). While no emerging technology options are selected at the lower clean energy penetrations, new nuclear resources are selected at the 90% (High Load only) and 95% (Reference and High Load) levels. Notably, in both cases, the new nuclear resources primarily displace other clean resources (wind, solar, and storage) instead of natural gas.

Figure 5-9. Southwest 2045 Total Installed Capacity (GW) | Reference Emerging Case



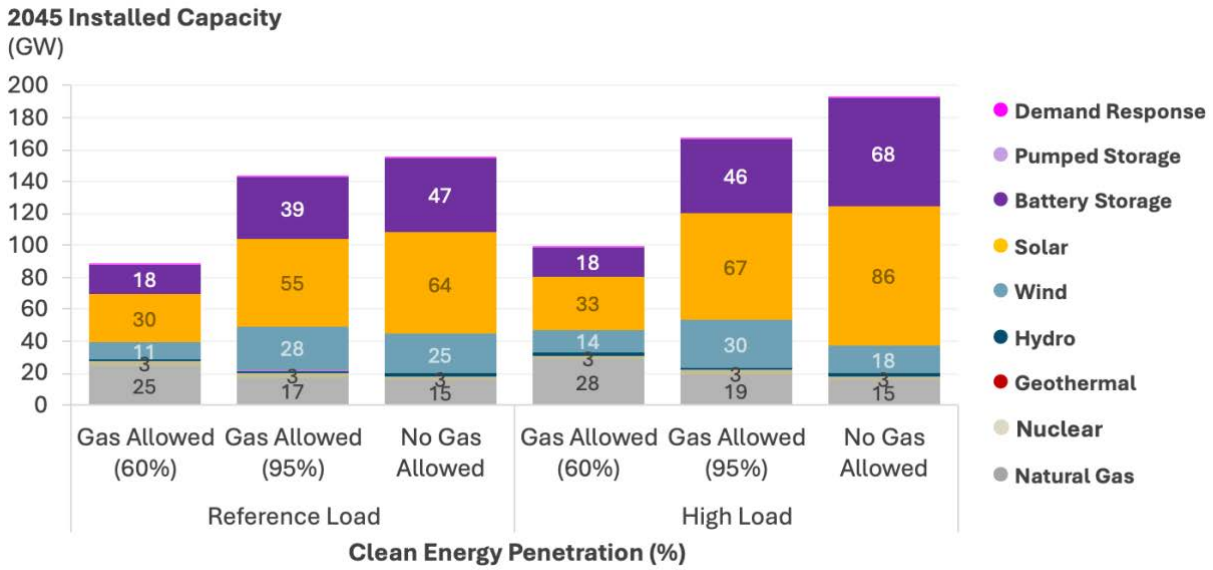
These results depend upon the cost input assumptions used for emerging technologies, and while the cost assumptions used in this study are intended to be reflective of emerging technologies reaching broad market readiness, technological breakthroughs could result in even larger quantities of emerging technologies providing viable options to contribute to regional resource adequacy needs.

5.4.4.3. No New Natural Gas Sensitivity

To further examine the role of firm resources, this study also investigated scenarios in which the new natural gas resources were not included as an option in the LTCE modeling. Figure 5-10 shows total installed capacity in the 95% clean energy portfolios of the reference and high load cases with and without this constraint to new gas builds. The constraint to new gas builds results in a larger system size.

- In the Reference Load case, avoiding the 2 GW of new gas capacity selected in the 95% Clean Energy portfolio requires an additional 8 GW of storage and 6 GW of renewables.
- In the High Load case, avoiding the 4 GW of new gas capacity selected in the 95% Clean Energy portfolio requires an additional 18 GW of storage and 11 GW of renewables.

Figure 5-10. Installed capacity comparison between portfolios with and without new natural gas considered as an option



Under the no new gas allowed cases, loss-of-load events are larger in magnitude as a the result of energy deficiency. These are typically observed during sustained periods of low renewable production that may last multiple days and occur in the summer or the winter. Portfolios that include new gas resources successfully minimize this risk, as the quantity of firm resources capable of generating round the clock is typically sufficient to backfill the energy shortfalls from renewables; portfolios without new gas resources do not have sufficient firm resource capacity to meet system needs during these events, and the resulting effect is that a significant portion of load cannot be served over an extended period of time.

Figure 5-11 and Figure 5-12 provide contrasting examples of how portfolios with and without new gas resources perform under such an event (based on actual winter weather conditions observed from December 1 to 7, 2011). During this week, the Southwest region experienced a winter storm and cloudy conditions, resulting in abnormally low solar output on multiple cloudy days.

- In a portfolio with new natural gas capacity, the quantity of firm resources available (roughly 20 GW) is sufficient, in combination with lower outputs from renewables and storage, to maintain reliability through this event.
- In a portfolio without new natural gas capacity, storage resources are fully depleted on the second day, and because the amount of firm capacity available is much lower, the system experiences a loss of load event that spans from late evening on the fourth day to sunrise the next morning. Also notable about this event is its size: during the period of loss of load, roughly 10 GW – approximately one third of the region's loads – cannot be met by the resources in the portfolio.

Figure 5-11. Hourly Generation 95% High Load Case with Incremental Natural Gas, December 1-7 (GWh)

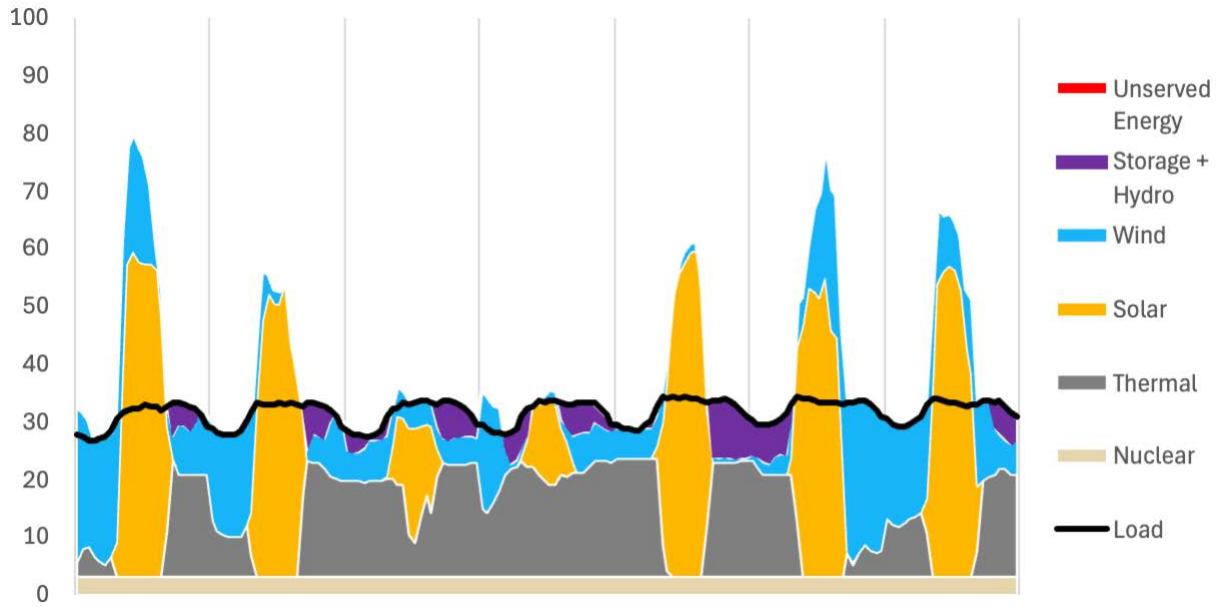
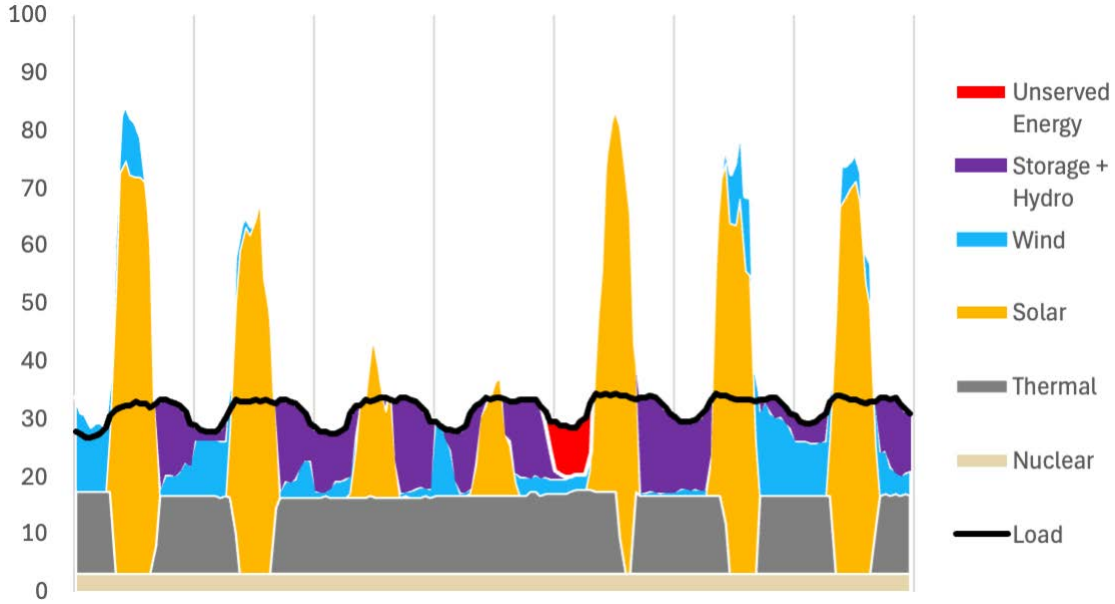
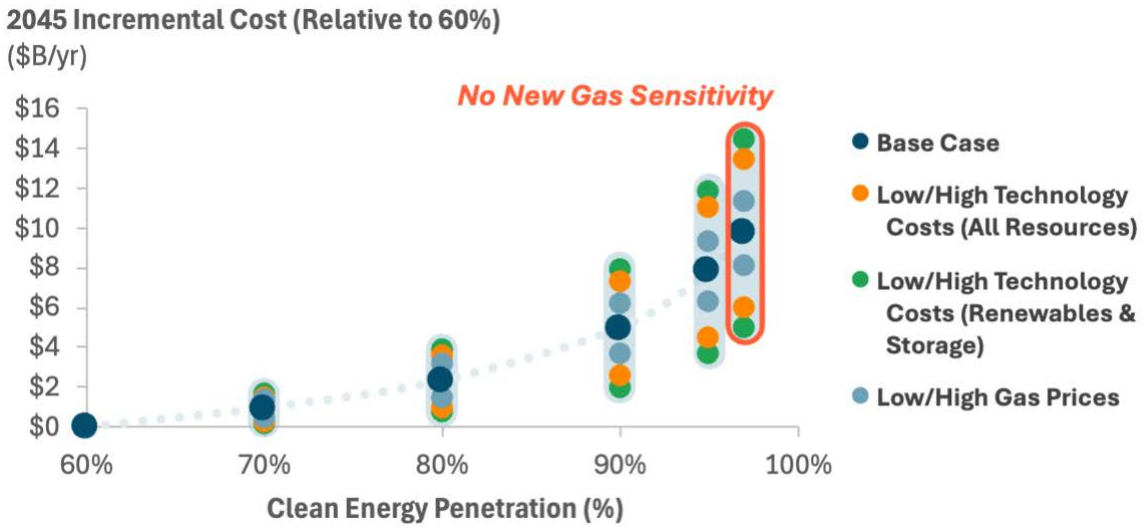


Figure 5-12. Hourly Generation 95% High Load Case Without Incremental Natural Gas, December 1-7 (GWh)



In addition to greater exposure to higher risks of large loss-of-load risks, portfolios that exclude new natural gas resources as an option also exhibit higher costs. Figure 5-13 compares the incremental costs associated with the "No New Gas" sensitivities against the suite of portfolios generated at different levels of clean energy penetration; across all cost assumptions, the sensitivity portfolio without gas shows higher costs than all alternatives, including the 95% Clean Energy portfolio.

Figure 5-13. Portfolio cost comparison including No New Gas sensitivity portfolio



5.5. Discussion

Across all long-term portfolios, maintaining resource adequacy requires a diverse mix of variable, energy-limited, and firm resources. Variable renewables (primarily solar and wind) provide large shares of annual energy, while energy-limited resources (storage, hydro, and demand response) shift energy across hours and help move periods with excess energy to periods with a deficit in energy. However, as penetrations rise, both variable and energy-limited resources experience declining marginal capacity value, reinforcing the need for portfolios that combine complementary resource types rather than relying on any single technology type.

Firm resources are critical to reliability in every portfolio because they can sustain output during multi-hour and multi-day periods when renewable production is low and energy-limited resources are depleted. In practice, this includes conventional firm capacity, such as natural gas (and existing nuclear), which serves as a backstop for critical periods across both summer high load periods and winter low-renewable conditions. The results show that even under higher clean energy penetration, portfolios add new firm capacity for limited periods when the system is capacity- and energy-deficient.

Today, the range of scalable firm options is limited, and natural gas remains the most viable broadly available choice to provide new firm capacity over the planning horizon evaluated in this assessment. Looking forward, if clean firm technologies become commercially available at scale, they can provide the same reliability role as conventional firm resources. In that future, clean firm resources could be dispatched to complement variable and energy-limited resources—providing sustained energy during low-renewable periods and preserving storage energy for the highest-risk hours—alongside any remaining conventional firm capacity.

6. Key Findings & Implications

6.1. Key Findings

The near-term and long-term assessments inform six key findings from this assessment. The first three focus primarily upon the results of the near-term assessment, and the second three build upon these based on the results of the long-term assessment.

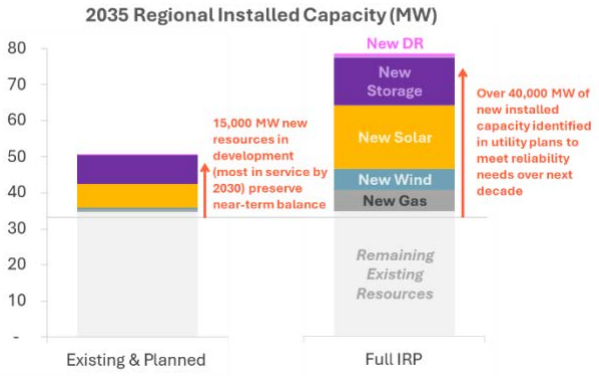
1. Need for New Resources is Urgent

Large increases in regional demand, coupled with anticipated retirements, continue to drive a significant need for new resources across the region to maintain reliability

Over the next decade, the anticipated demand based on utility inputs to this study shows regional coincident peak demand increasing from roughly 27,500 MW to over 36,000 MW. At the same time, assumed retirements and expiring contracts with existing resources result in the loss of nearly 8,000 MW of effective capacity from the 2025 existing portfolio. For a system at or near load-resource balance today, the compound effect of these two changes is a total need for new *effective* capacity of roughly 18,000 MW over the next decade.

2. Utility Plans Demonstrate Adequacy

Over the next decade, utilities' resource plans include new natural gas, renewables, and storage sufficient to maintain regional resource adequacy



Collectively, the utilities' resource plans provided as inputs for this assessment include over 40,000 MW of new installed capacity by 2035. If these resources are successfully brought in service according to prescribed schedules – which will require a rate of new resource additions far greater than recent historical trends – this study shows that the region will maintain sufficient generating capacity to ensure a level of resource adequacy consistent of LOLE of 0.1 days per year or better. Notably, the *nameplate* capacity of the resource additions included in utility plans (40,000 MW) far exceeds the amount of *effective* capacity they provide to the system to ensure reliability due to the inherent limitations of variable and energy-limited resources. [29]

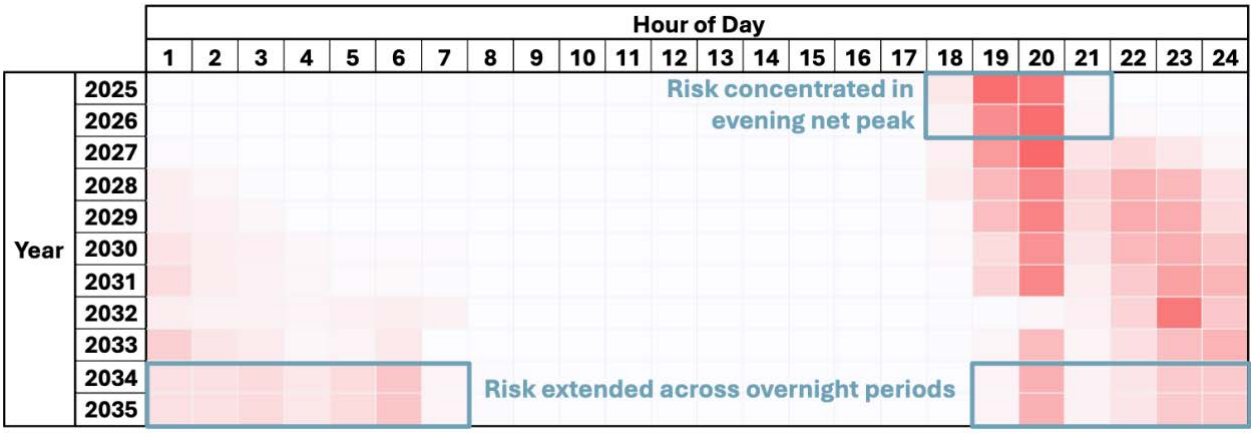
[29] Effective capacity (or perfect capacity) measures a resource's contribution to resource adequacy, typically measured against a "perfect resource" or a resource that is available at all times.

3. Reliability Risks are Shifting Rapidly

Reliability risk has already shifted from afternoon peak to the evening "net peak," and will extend deeper into overnight periods as resource mix evolves

The Southwest utilities are planning to meet a growing share of future resource adequacy needs with renewable and energy storage resources; by 2035, these resources are projected to account for roughly half of the total effective capacity in the region. These portfolio changes directly impact the timing of reliability risks, which shift away from the traditional peak period as penetrations of variable resources rise. This effect is already present in today's system, as the growth of solar has caused risk to shift into the evening. Over the next decade, increasing levels of energy-limited resources will continue to shift and extend the periods when the system is at the edge of reliability (see Figure 6-1). Based on utility plans, higher risks in the late evening and overnight periods could begin to emerge as soon as 2027.

Figure 6-1. Relative loss-of-load risk by time of day based on utility plans, 2025-2035



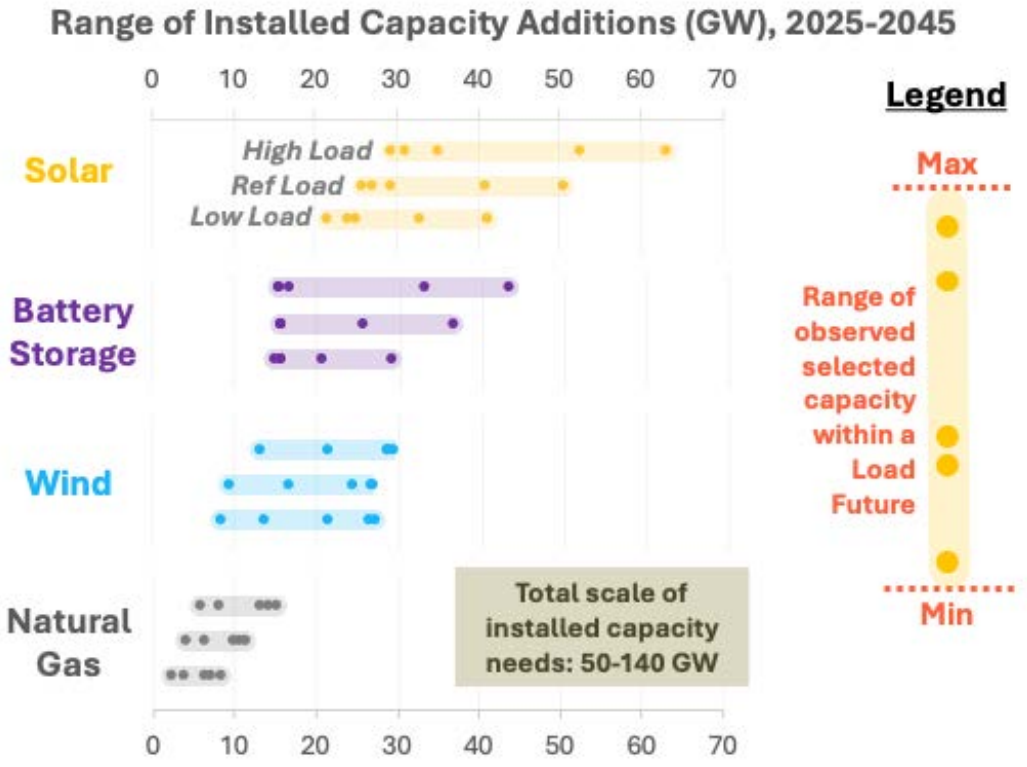
These effects are caused by evolving portfolio identified across all utilities to meet their needs, and in turn, directly impact the contributions that additional resources can make to resource adequacy in multiple ways. With existing solar penetration shifting risk to late evenings, marginal solar additions provided limited reliability value (marginal solar provides between 5 to 7%). Beyond 2027, the extension of risk into the overnight periods contributes to the observed declines in the marginal capacity value of short-duration storage resources (4-hr storage decreases from 90% in 2025 to 38% in 2035), which in turn increases the relative value of resources that can provide longer duration services to the grid and firm resources capable of generating over sustained periods without limits on their use.

4. Diversity is a Robust Long-Term Strategy

Meeting growth with a combination of new gas, renewables, and storage resources is a robust strategy across a wide range of longer-term future conditions

Beyond 2035, maintaining resource adequacy, as loads continue to grow and existing resources retire, will require substantial investments in new resources. This study demonstrates that regional resource adequacy can be met with a wide range of resource mixes, showing reliable resource portfolios that span from 60 to 95% clean energy; across all portfolios studied, the total amount of new installed capacity added between 2025 and 2045 ranges from 50 to 140 GW. In all cases where the availability of commercially available technologies is not explicitly restricted, long-term needs are met by a diverse mix of new renewables, storage and natural gas resources; the range of new resource additions by technology across the twenty-year period are shown in Figure 1-5. To the extent emerging technologies mature, they may also contribute to regional resource adequacy needs (as evidenced by the selection of new nuclear in several portfolios) but do not appear to diminish the importance of resource diversity. All portfolios also include continued expansion of energy efficiency and demand response; beyond these levels, additional demand-side resources (including behind-the-meter generation, virtual power plants, and incremental energy efficiency and demand response) could also contribute to meeting regional needs if they provide capabilities aligned with the future needs of the electricity system.

Figure 6-2. New installed capacity additions from 2025 to 2045 across portfolios in the long-term assessment

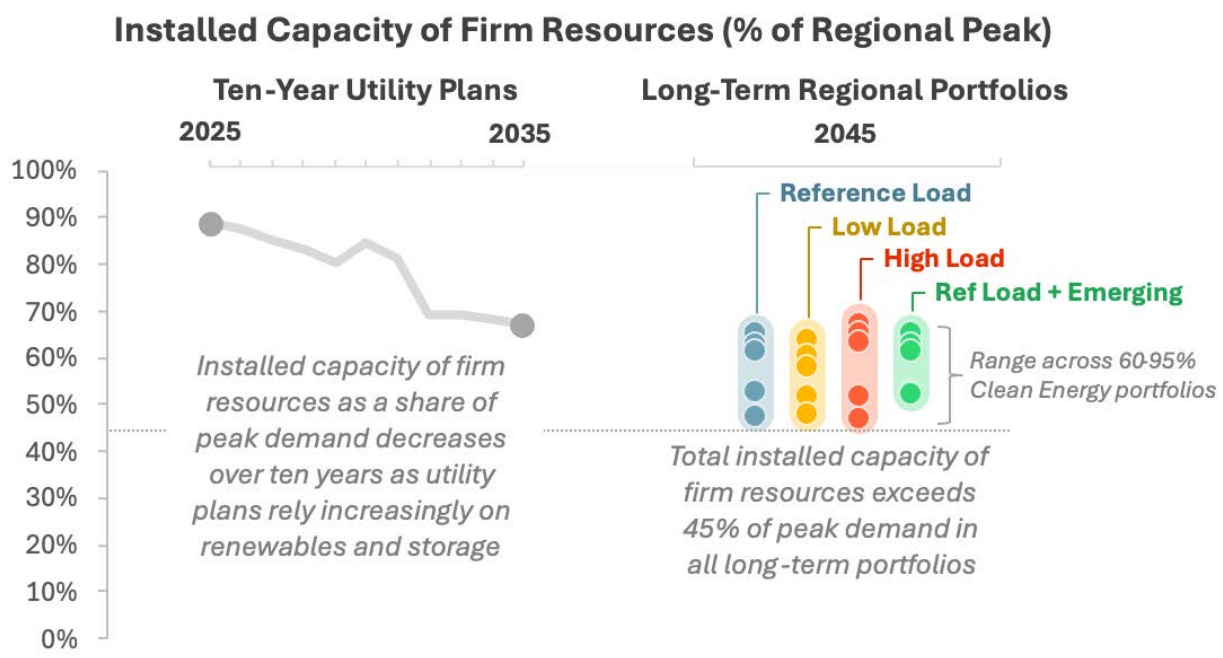


5. Firm Resources are Critical to Reliability

Firm generation resources remain essential to ensuring long-term resource adequacy and mitigating risks of large energy deficiencies, particularly during periods when renewable output is low

While the contributions of variable and energy-limited resources to resource adequacy are substantial across all portfolios analyzed, both categories of resources are subject to significant declines in their marginal capacity value at higher penetration. In practice, this means that even if portfolios include renewables and storage capable of serving most annual energy needs, ensuring resource adequacy also requires "firm" resources capable of producing energy across sustained periods when renewables and energy storage may be unavailable. Across all portfolios analyzed in the long-term assessment where new firm resource options are unconstrained, their total installed capacity ranges between 45-70% of system peak demand (Figure 6-3). In all long-term portfolios, nuclear and natural gas resources play a critical role in ensuring reliability when electric demand is high, renewable availability is low, and energy storage resources have been depleted (for instance, during cloudy winter weeks). Under such conditions, resources with the capability to generate on demand for as long as necessary allow the system to maintain reliability.

Figure 6-3. Summary of firm resource contributions across near-term and long-term assessments

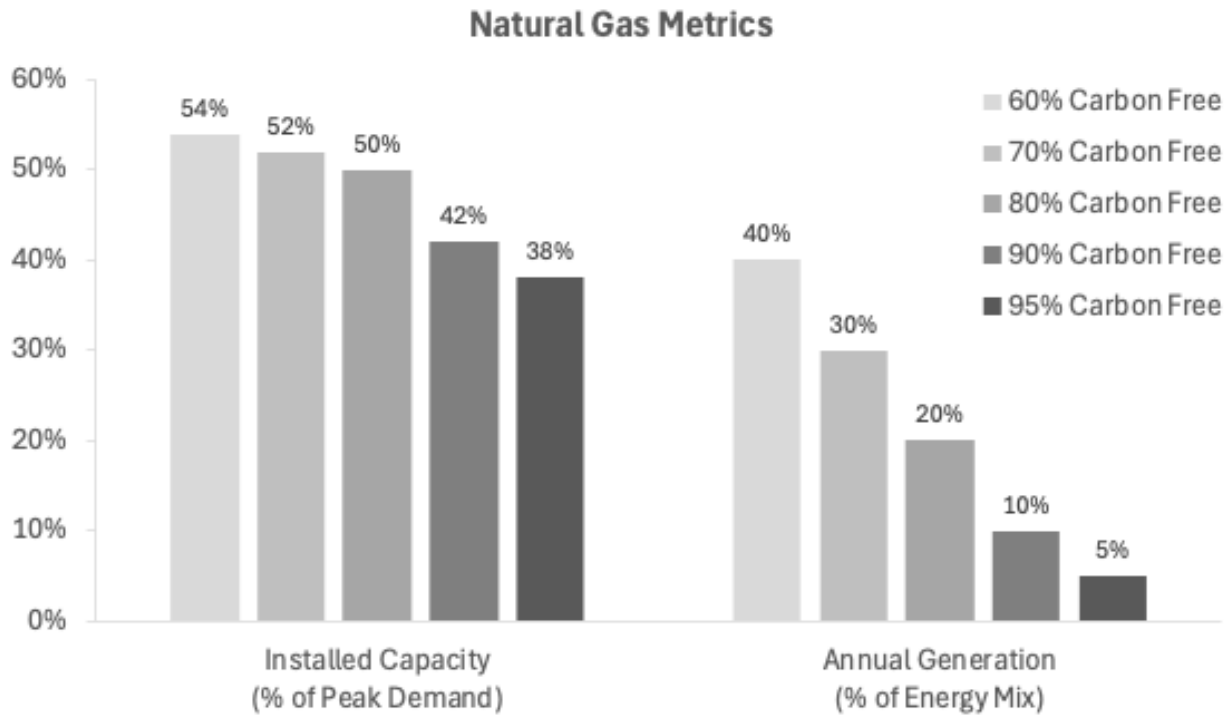


6. Natural Gas Remains the Primary Firm Option

Across all portfolios, natural gas fulfills the majority of the region's long-term need for firm resources, even under the highest clean energy penetrations studied.

The range of portfolios in the long-term assessment yields useful insights into the future adequacy of natural gas, captured through three metrics, shown in Figure 6-4: (1) **installed capacity,** the total gas capacity needed to ensure reliability and (2) **annual generation,** the share of regional energy produced by gas-fired resources. Across the portfolios, as clean energy penetration rises from 60 to 95%, annual gas generation falls sharply (from 40% to 5% of total energy) while installed capacity declines only modestly, from 54 to 38% of peak demand. This contrast is the key finding: increasing clean energy primarily reduces how often gas resources must run, not how much capacity is required. Even at 95% clean energy, a large amount of natural gas capacity (nearly 40% of peak demand) plays a critical reliability role, where it serves as a rarely-used backstop option during periods of low renewable output.

Figure 6-4. Key metrics for natural gas fleet in long-term adequacy assessment



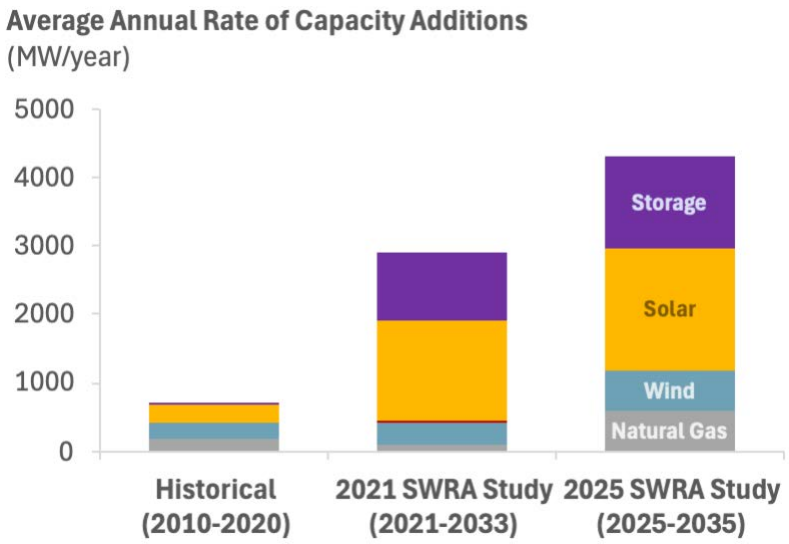
These results further underscore the finding that additions of new natural gas resources to the region are part of a robust strategy to meet near- and long-term resource adequacy needs, capable of supporting grid reliability across a wide range of future clean energy penetrations and load levels.

6.2. Conclusion and Implications

Both the 2021 and 2025 assessments indicate that, despite increasing portfolio complexity and evolving resource adequacy risks, the utilities' collective planning practices are effective in their identification of resource portfolios with the technical ability to maintain regional resource adequacy. Notably, the two assessments reached this conclusion while evaluating different load forecasts and resource portfolios. The consistency of this technical result provides strong evidence that utilities' methods and analytical toolkits provide a sound foundation for resource adequacy planning, and that utilities have used this foundation to adjust plans quickly in response to the changing outlook for future demand.

Having demonstrated that the utilities' plans have the technical capability to meet projected needs, the most immediate challenge for maintaining regional resource adequacy lies in successful implementation. Meeting the needs forecasted in this study would require that utilities add over 4,000 MW of new installed capacity to the system each year over the next decade – a quantity that exceeds the necessary rate of additions previously identified in the 2021 study and eclipses the long-term historical average by a factor of four (see Figure 6-5).

Figure 6-5. Comparison of annual average capacity additions



In an environment marked by heightened uncertainty and rapid change, translating these plans into reliable real-world outcomes presents a more multifaceted set of challenges than the planning itself. Successful implementation will require coordinated orchestration across a range of processes, systems, and institutions involving a wide range of regional stakeholders. The region's utilities will naturally play a central role in each step of implementation, but the ultimate outcomes will reflect the collective performance of actors and systems that no single entity controls. Given the rapid pace of change and potential for unanticipated shifts in the energy landscape, even well-formulated plans will likely require frequent reevaluation and revision; the ability to monitor emerging conditions, identify gaps early, and adapt accordingly will be as important as the plans themselves. The following risk factors represent the most significant aspects of implementation required to ensure resource adequacy:

- **Management of load forecast uncertainty:** since the 2021 study, utilities in the Southwest – and across the country – have experienced large increases in service requests from large customers, but the long-term growth of this new continues to be a major source of

uncertainty. Ongoing revisions to load forecasts as the outlook for large customers evolves makes reliability planning a moving target and increases the risk of misalignment between resource development and actual system needs.

- **Procurement & supply chain:** since 2021, global and domestic supply chain constraints have contributed to an increasing trend of increasing project costs and longer lead times for key equipment, highlighting the potential for macroeconomic shocks to create perturbations with far-reaching impacts upon electric utilities. These dynamics are anticipated to persist as demand growth from data centers and other large customers continues at a national scale. This trend has led to an increasing number of project delays and cancellations in recent years and continues to lengthen development timelines for new resources. Longer lead times for new resources and higher risks of potential delays or cancellations will place pressure on utilities to accelerate procurement processes; with many new projects requiring up to five years to complete development, a large portion of the resource procurement to meet 2035 resource requirements will likely occur by 2030.
- **Transmission interconnection & deliverability:** in addition to planning a portfolio of resources capable of supplying load, utilities must also ensure that the transmission system is sized appropriately to allow those resources to be delivered to load when needed. Each new resource requires interconnection studies to identify necessary system upgrades, and large-scale resource development will likely necessitate major transmission expansions. These projects can take a decade or more to plan, permit, and construct. Proactive transmission planning, along with strategies to maximize the use of existing infrastructure as legacy resources retire, can help mitigate these risks.
- **Permitting & regulatory approval processes:** utilities and developers must obtain a variety of permits and regulatory approvals in the process of developing new generation (and associated transmission) from a variety of bodies, which may include local governments, tribal authorities, regulatory agencies and boards, and federal bodies. Higher volumes of applications associated with a faster pace of development may place strain on these processes and could be a contributing factor to delays. Further, in some cases, local ordinances or opposition to project siting may further constrain development opportunities.
- **Operations & market integration:** as the resource mix shifts towards increasing levels of variable and energy-limited resources, grid operations are becoming significantly more complex. Utilities will need more advanced forecasting capabilities (e.g., load, weather, and renewable generation), enhanced real-time visibility, and more sophisticated dispatch strategies to maintain reliability. Effectively integrating storage resources will be especially critical, requiring optimized charging and discharging strategies to capture their full reliability value.
- **Fuel supply:** with the expectation that the region's reliance on natural gas as a capacity resource will increase over the next decade, the region's utilities must also right-size their fuel transportation rights. Several utilities within the region are currently relying upon timely completion of a new interstate pipeline – a project subject to permitting and approval processes in multiple jurisdictions – by the early 2030s to allow for incremental delivery capability to new natural gas power plants.

Delays or unexpected obstacles caused by any one of these factors – or further increases in regional demand not anticipated at the time of this study – could jeopardize utilities' ability to add resources to the system at the pace needed to meet regional growth projections reliably. To mitigate these risks and support successful implementation, utilities and regional stakeholders can focus on several near-term actions:

- **Proactively manage large customer load risks:** strengthen interconnection and service agreements (e.g., financial commitments, phased delivery structures); design rates or tariffs that better align large customer development with system planning needs
- **Accelerate procurement timelines and optionality:** initiate procurements earlier; maintain diversified pipelines of projects to limit systemic risks; incorporate flexibility to account for delays or cancellations; leverage cost-effective demand-side programs to reduce scale of bulk system needs
- **Coordinate transmission and resource planning:** pursue parallel development of generation and transmission through Integrated System Planning; prioritize upgrades that enable access to diverse resource options; repurpose existing infrastructure made available with resource retirements
- **Streamline permitting and stakeholder engagement:** engage early with permitting agencies and local communities to identify and address potential barriers before they delay projects; explore potential to streamline local permitting with model ordinances; repurpose existing brownfield power plant sites
- **Enhance operational capabilities:** invest in advanced forecasting, grid visibility tools, and optimized dispatch strategies, particularly for energy storage and hybrid resources; coordinate with market operators to ensure market rules enable maximum storage value
- **Strengthen fuel and market coordination:** secure fuel transportation capacity needed to support resource plans; identify short-term risk mitigation strategies to ensure adequacy in the event of delay

While these actions cannot fully eliminate implementation risk, sustained focus in these areas will improve the likelihood that planned resources are delivered on time and that regional reliability is maintained under increasingly uncertain conditions.

APPENDIX M: RELIABILITY AND RESOURCE ADEQUACY STUDY

This appendix provides the PNM Reliability and Resource Adequacy Study, performed by PowerGem.

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2026 PNM Integrated Resource Plan Supporting Analysis

Reliability and Resource Adequacy Study

PREPARED BY

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Abbreviations

4HR	Four-hour duration storage
8HR	Eight-hour duration storage
AGC	Automatic Generation Control
BA	Balancing Area
CBO	Congressional Budget Office
CC	Combined cycle generating unit
CT	Combustion turbine
CTP	Current Trends and Policy
DR	Demand response
E3	Energy and Environmental Economics, Inc.
EFOR	Equivalent Forced Outage Rate
EIA	U.S. Energy Information Administration
ELCC	Effective Load Carrying Capability
EPE	El Paso Electric
EUE	Expected Unserved Energy
FERC	Federal Energy Regulatory Commission
GADS	Generating Availability Data System
GDP	Gross Domestic Product
GWh	Gigawatt-hour
HEG	High Economic Growth
ICAP	Installed (nameplate) capacity
IRP	Integrated Resource Plan
kW	Kilowatt
LOLE	Loss of Load Expectation
LOLH	Loss of Load Hours
MW	Megawatt
MWh	Megawatt-hour
NMPRC	New Mexico Public Regulation Commission
NMWEC	New Mexico Wind Energy Center
NREL	National Renewable Energy Laboratory
NSRDB	National Solar Radiation Database
PNM	Public Service Company of New Mexico
PRM	Planning Reserve Margin
PSCo	Public Service Company of Colorado
PSH	Pumped storage hydro
PV	Photovoltaic
RFP	Request for Proposals
SAM	System Advisor Model (NREL solar modeling tool)
SERVM	Strategic Energy and Risk Valuation Model

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Executive Summary

PowerGEM conducted a suite of resource adequacy and reliability analyses in support of the Public Service Company of New Mexico (PNM) 2026 Integrated Resource Plan (IRP), all performed using the Strategic Energy and Risk Valuation Model (SERVM). Determining the Planning Reserve Margin (PRM) and accrediting resources within a single, synchronized analysis ensures the targeted reserve margin and resource accreditation for PNM's fleet of resources are aligned in the context of resource adequacy. The analysis comprised the determination of the PRM and existing resource accreditation for the 2029 base case, which represents PNM's expected 2029 resource portfolio and load forecast as described in the **SERVM Model Inputs** section of this report, incremental Effective Load Carrying Capability (ELCC) values for new candidate resources, reliability verification of PNM's expansion portfolios, a resiliency analysis under extreme weather, and a transmission import sensitivity.

PowerGEM first analyzed the system to set a baseline of resource adequacy, given PNM's existing fleet of resources and load level. The base case of existing resources was calculated to have a Loss of Load Expectation (LOLE) below the 0.1 target, meaning the modeled portfolio carried more dependable capacity than required for the reliability standard. Economic development load was added to calibrate the system to the 0.1 LOLE target, resulting in a PRM of 14.5%. The existing fleet was accredited entirely on an ELCC basis: wind, solar, battery storage, and demand response (DR) through the Delta Method, and the conventional thermal fleet through a thermal ELCC analysis. The full accreditation by technology and calculated PRM is shown below in **Table 1**.

Table 1: Resource Accreditation and Planning Reserve Margin

Unit Category	ICAP (MW)	ELCC (%)	Accreditation (MW)
Battery	1,950	75%	1,471
Combined Cycle	425	92%	393
Combustion Turbine	786	98%	774
Demand Response	35	59%	21
Geothermal	11	76%	8
Nuclear	288	94%	271
Solar	2,412	19%	458
Steam Turbine Coal	200	72%	143
Steam Turbine Gas	145	92%	133
Wind	1,408	12%	169
Total Accredited Capacity			3,841
Peak Load at 0.1 LOLE			3,354
Planning Reserve Margin			**14.5%**

To properly capture resource accreditation as the penetration of energy-limited technologies changes over time, incremental ELCC values were developed for solar, wind, 4-hour (4HR) storage, 8-hour (8HR) storage,

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pumped storage hydro (PSH), DR, and energy efficiency and used as inputs for the expansion planning analysis.

A transmission sensitivity was performed in SERVM to evaluate the reliability benefit of increased summer import capability. The analysis showed that doubling the summer peak import capacity from 50 MW to 100 MW produced an approximate 40 MW reliability benefit, corresponding to a reduction of roughly 1.4 percentage points in the targeted PRM, from 14.5% to 13.1%.

After PNM determined its candidate expansion portfolios for the Current Trends and Policy (CTP) and High Economic Growth (HEG) futures, these portfolios were then simulated for study years 2036, 2040, and 2045 to verify their reliability against the 0.1 LOLE target. The incremental 4HR storage adjustment needed to bring each portfolio to the 0.1 LOLE target was calculated. The results are shown in **Table 2** and **Table 3**. A stakeholder-proposed portfolio was also simulated to verify its resulting LOLE and is included in the body of the report.

Table 2: CTP Portfolio Reliability Results

Study Year	LOLE (days/year)	EUE (MWh)	Estimated Reserve Margin (%)	4HR Adjustment for 0.1 LOLE (MW)
2036	0.05	38	18.8%	−170
2040	0.23	221	13.6%	+285
2045	0.08	99	14.2%	−90

Table 3: HEG Portfolio Reliability Results

Study Year	LOLE (days/year)	EUE (MWh)	Estimated Reserve Margin (%)	4HR Adjustment for 0.1 LOLE (MW)
2036	0.05	34	18.6%	−230
2040	0.11	80	15.2%	+20
2045	0.03	19	15.1%	−190

Finally, a resiliency analysis was performed on PNM's CTP and HEG portfolios. This analysis evaluated portfolio performance during an extreme summer weather week and an extreme winter weather week, each simulated with and without market assistance. The results are shown below in **Table 4** and **Table 5**. More discussion on these results is included in the body of the report but it is clear PNM's interconnections provide significant resiliency benefit.

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Table 4: Summer Resiliency Weekly EUE (MWh)

Portfolio	Year	Interconnected Weekly EUE (MWh)	Islanded Weekly EUE (MWh)
CTP	2036	6	3,758
CTP	2040	1	4,383
CTP	2045	4	2,509
HEG	2036	33	3,892
HEG	2040	13	3,596
HEG	2045	7	1,152

Table 5: Winter Resiliency Weekly EUE (MWh)

Portfolio	Year	Interconnected Weekly EUE (MWh)	Islanded Weekly EUE (MWh)
CTP	2036	259	9,259
CTP	2040	614	10,237
CTP	2045	76	3,823
HEG	2036	252	17,187
HEG	2040	528	6,061
HEG	2045	54	2,470

A second analysis compared how different resource types contribute to resiliency. Starting from the CTP 2036 portfolio calibrated to 0.1 LOLE, 100 MW of load was added to the portfolio. LM6000 combustion turbine, 4HR storage, DR, and combined solar and storage technologies were each added independently in the amount needed to return the system to the 0.1 LOLE target.

When each resource was sized to meet the same 0.1 LOLE target, annual expected unserved energy (EUE) was lowest for the LM6000, followed by DR, then combined solar and storage, and highest for stand-alone 4HR storage. The difference is largest under sustained winter conditions, where energy-limited resources cannot maintain output across extended extreme weather circumstances. The ordering of the technologies changes under extreme summer conditions, where shortfalls are concentrated in a few evening hours that fall within the discharge duration of storage, and because there is significant capacity added to achieve 0.1 LOLE, DR and the storage-based resources hold EUE below that of the LM6000, with DR clearing the extreme summer week entirely. Again, to achieve a 0.1 LOLE, 580 MW of DR was needed versus 105 MW of the LM6000 resource. The results are summarized below in **Table 6**.

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Table 6: 2036 Resiliency Comparison of Different Technologies

Marginal Resource	Marginal MW	Full Study Annual EUE (MWh)	Summer Extreme Week EUE (MWh)	Winter Extreme Week EUE (MWh)
LM6000	105	67	26	145
4HR	345	107	13	603
Demand Response	580	73	0	474
Solar and Storage	580/290	100	<1	463

Study Methodology

Scope of 2026 IRP Analysis

PowerGEM performed a suite of resource adequacy and reliability analyses in support of PNM's 2026 IRP, all conducted using SERVM. The analysis comprised five workstreams:

- **Database Development:** Update the SERVM database with the best available data. The processes involved are detailed in the SERVM Model Inputs section.
- **PRM and Existing ELCCs:** Determination of the PRM and ELCC accreditation of the existing resource fleet for the 2029 base case study year.
    - **Transmission Sensitivity:** Examining the reliability benefit of increased summer import capability.
- **Incremental ELCCs:** ELCC values for incremental resource additions to support expansion planning.
- **Portfolio Reliability Checks:** Verification that PNM's candidate expansion portfolios meet the 0.1 LOLE target.
    - **Stakeholder Proposed Scenario:** Simulate the portfolio in SERVM to verify LOLE.
- **Resiliency Analysis:** Evaluation of portfolio performance under extreme summer and winter weather conditions.
    - **Resiliency Comparison of Different Technologies:** Compare the impact that different resource classes have on resiliency.

The workflow is illustrated in **Figure 1** below and the methodology for each workstream is described in detail in the sections that follow.

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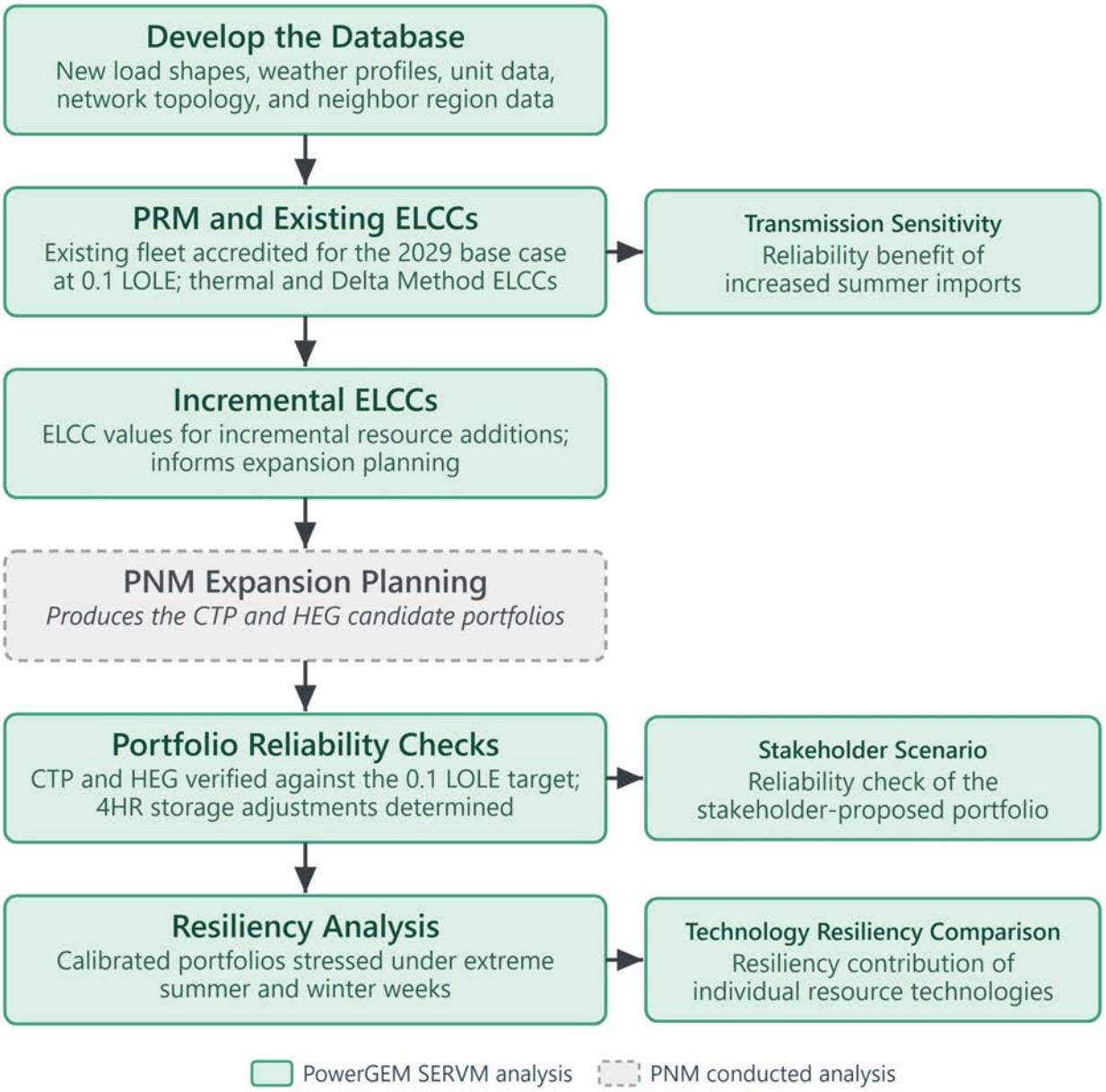
Figure 1: 2026 IRP Resource Adequacy Workflow



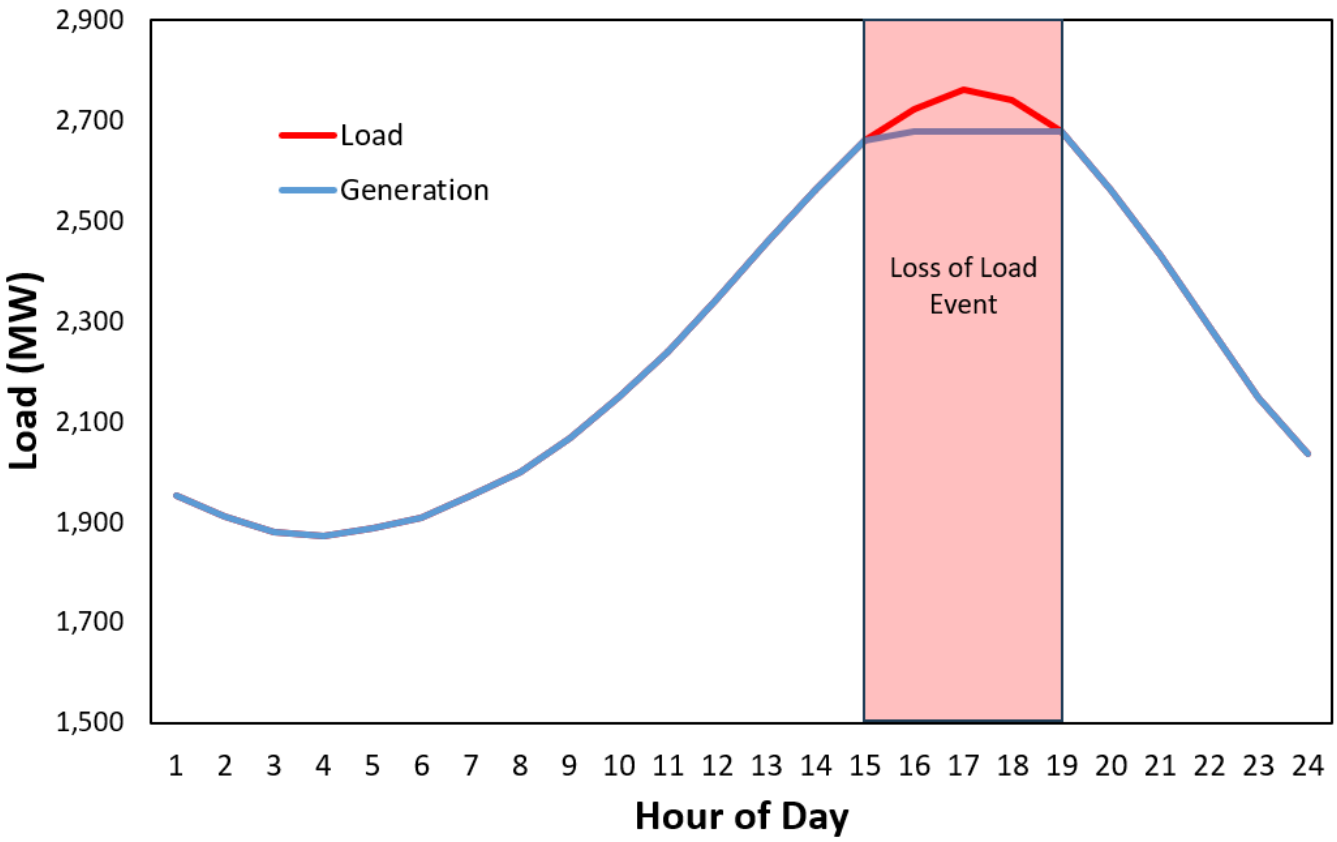
Planning Reserve Margin and Existing ELCCs

Planning Reserve Margin

The PRM is the amount of dependable resource capacity a system must carry above its expected peak demand to maintain target reliability metrics. It is expressed as the ratio of accredited capacity in excess of peak load to the peak load itself. Determining the PRM and accrediting resources within a single, synchronized analysis ensures that the capacity a resource is credited with contributing is consistent with the capacity the system relies upon to meet its reliability target.

The reliability target used to establish the PRM in this analysis is LOLE, defined as the expected number of days per year on which available capacity is insufficient to serve firm load. Such a capacity shortfall typically occurs across the peak of a day, when demand is highest relative to available supply. **Figure 2: Loss of Load Event Illustration** depicts an example of this type of loss of load event.

Figure 2: Loss of Load Event Illustration



PNM targets the LOLE reliability standard of 0.1 days per year. LOLE is a probabilistic measure of how often available resources are expected to fall short of load, evaluated across thousands of simulated combinations of weather, load, forced outages, and variable generation output. The one-day-in-ten-years criterion is the standard planning basis across North America[1]. RTOs such as the PJM Interconnection[2] and Midwest Independent System Operator (MISO)[3] use the one-day-in-ten-years standard. Utilities such

[1]NERC, Long Term Reliability Assessment. Available at https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf
[2] https://www.pjm.com/-/media/documents/manuals/m20a.ashx, page 8.
[3] https://cdn.misoenergy.org/Resource%20Accreditation%20White%20Paper%20Version%202.1630728.pdf, page 2.

as Duke Energy[4] and Arizona Public Service Company[5] also use the same standard to ensure resource adequacy on their respective systems.

A base case was created and used as the foundation for determining the PRM, existing ELCCs, and incremental ELCCs. The base case represents PNM's expected 2029 system: the existing and planned resource portfolio paired with the 2029 CTP load forecast, simulated under the weather, outage, and market assistance assumptions described in the **SERVM Model Inputs** section. It is the starting point against which every other case in this report is measured. This base case was modeled for the 2029 study year with the existing resources shown in **Table 15** and the load forecasts shown in the **Load Forecasts and Load Shapes** section of this report.

The PRM, illustrated in **Figure 3,** is determined as follows. The base case was simulated in SERVM at its forecasted load and was calculated to have an LOLE below the 0.1 target, meaning the modeled portfolio carried more dependable capacity than required for the reliability standard. This initial set of existing resources assumed additional gas resources PNM had identified in its 2029–2032 System Resources application filed with the New Mexico Public Regulation Commission (NMPRC) in mid-2026. PNM utilized generic gas resources to serve as placeholders until it determines actual resources that PNM intends to procure, following evaluation of Request for Proposals (RFP) bids it plans to receive in the second half of 2026. To calibrate the system to the target, economic development load was added until the system reached 0.1 LOLE. This calibrated load level represents the peak demand that the resource portfolio can serve at the reliability standard.

At the calibrated 0.1 LOLE level, each resource is credited by its ELCC rather than its installed capacity (ICAP):

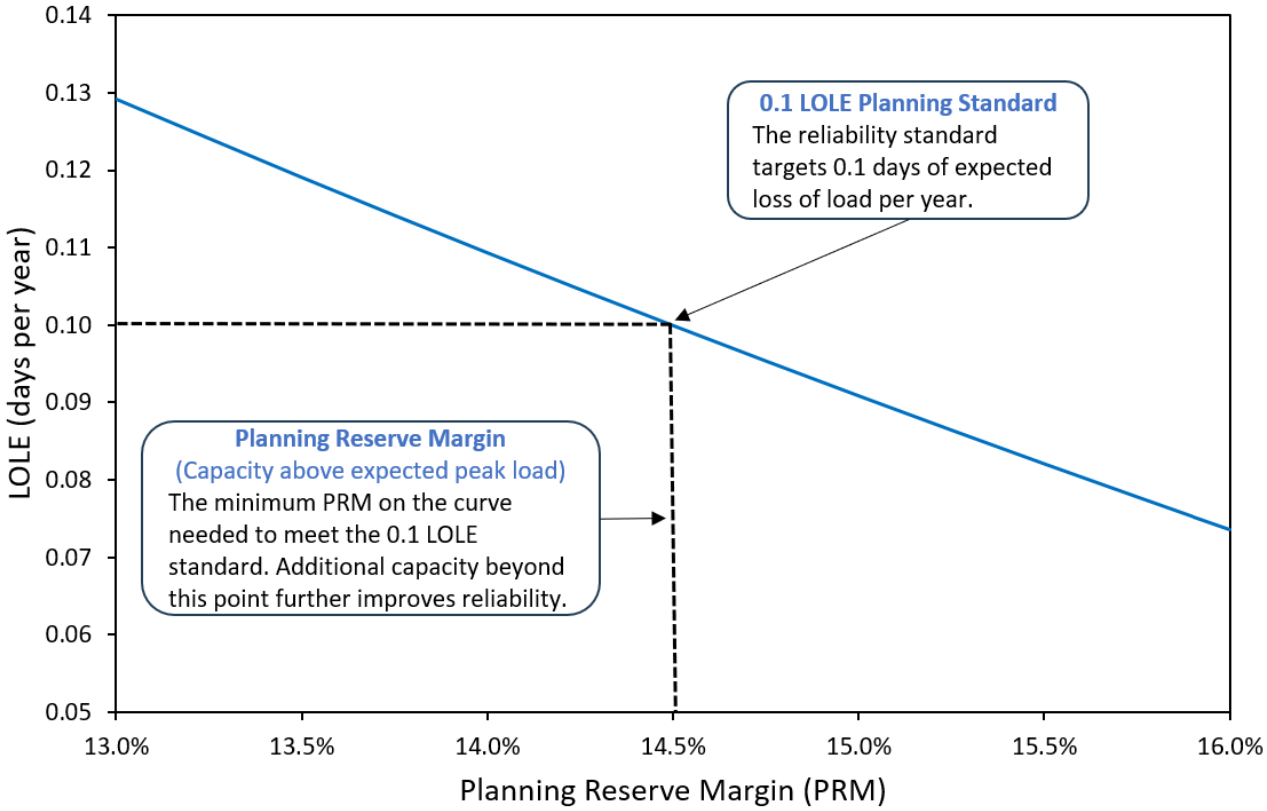
- Firm and conventional thermal resources are accredited using the thermal ELCC values described below.[6]
- Wind, solar, battery storage, and DR resources are accredited using ELCC values developed through the Delta Method described below.

The PRM is then calculated as the ratio of total accredited capacity in excess of the calibrated peak demand to that peak demand. Because all resource types are accredited on an ELCC basis, the resulting PRM reflects the true reliability contribution of each technology in the context of the full portfolio. The PRM established through this process provides the accreditation basis carried forward into the expansion planning and portfolio reliability analyses. Additionally, 12x24 heat maps showing the timing and

[4] https://www.duke-energy.com/-/media/pdfs/our-company/carolinas-resource-plan/chapter-1-changing-energy-landscape.pdf?rev=88d3584893bc4287be612875fae8bea8, page 7.
[5] https://www.aps.com/-/media/APS/APSCOM-PDFs/About/Our-Company/Doing-business-with-us/Resource-Planning-and-Management/APS_IRP_2023_PUBLIC.pdf?la=en&sc_lang=en&hash=DF34B49033ED43FF0217FC2F93A0BBE6, page 14.
[6] Due to its small nameplate capacity PNM's single geothermal unit was accredited using the UCAP methodology from last IRP of 1-EFOR.

magnitude of loss of load events for the base case calibrated to 0.1 LOLE are provided in the body of the report.

Figure 3: Planning Reserve Margin and 0.1 LOLE Planning Standard



Thermal ELCCs

Conventional thermal resources were accredited using an ELCC methodology applied at the resource category level. The thermal fleet was grouped into five categories: combined cycle (CC), combustion turbine (CT), nuclear, steam coal, and steam gas. The 2029 base case, calibrated to the 0.1 LOLE reliability target, served as the starting point for the analysis.

For each category, the ELCC for these firm dispatchable resources was determined as follows. The entire category was removed from the system, which increased LOLE, and perfect capacity[7] was then added back at several discrete megawatt levels. The resulting LOLE was recorded at each level, and the perfect capacity required to return the system to the base case LOLE was determined by interpolating across these points. The quantity of perfect capacity represents the accredited megawatt contribution of the category, and dividing it by the category's installed capacity yields the raw ELCC value.

To capture the combined contribution of the fleet, the entire thermal portfolio was then removed at once and the same procedure was applied, yielding the total portfolio thermal ELCC. Because of the effect of

[7] Perfect capacity was modeled as a resource with no outages, planned maintenance, or ramping constraints.

planned maintenance scheduling, the sum of the independently calculated category values does not exactly equal the portfolio value determined with all thermal units removed together. To reconcile this, the individual category ELCC megawatts were prorated so that their sum equals the total portfolio ELCC. The resulting category ELCC values were then applied in the PRM calculation to convert installed thermal capacity to accredited capacity.

The Delta Method

To calculate the ELCC of PNM's existing variable energy and energy-limited resources, such as wind, solar, battery storage, and demand-side resources, the Delta Method was used. The Delta Method by Energy and Environmental Economics, Inc. (E3)[8] is a widely used methodology to allocate portfolio ELCC among resource categories. The Delta Method relies on three measured ELCC values:

- **Portfolio ELCC:** total ELCC for a combination of variable energy and energy-limited resources.
- **First-In ELCC:** the marginal ELCC of each individual resource in a portfolio with no other variable energy or energy-limited resources.
- **Last-In ELCC:** the marginal ELCC value of each individual resource when taken in the context of the full portfolio.

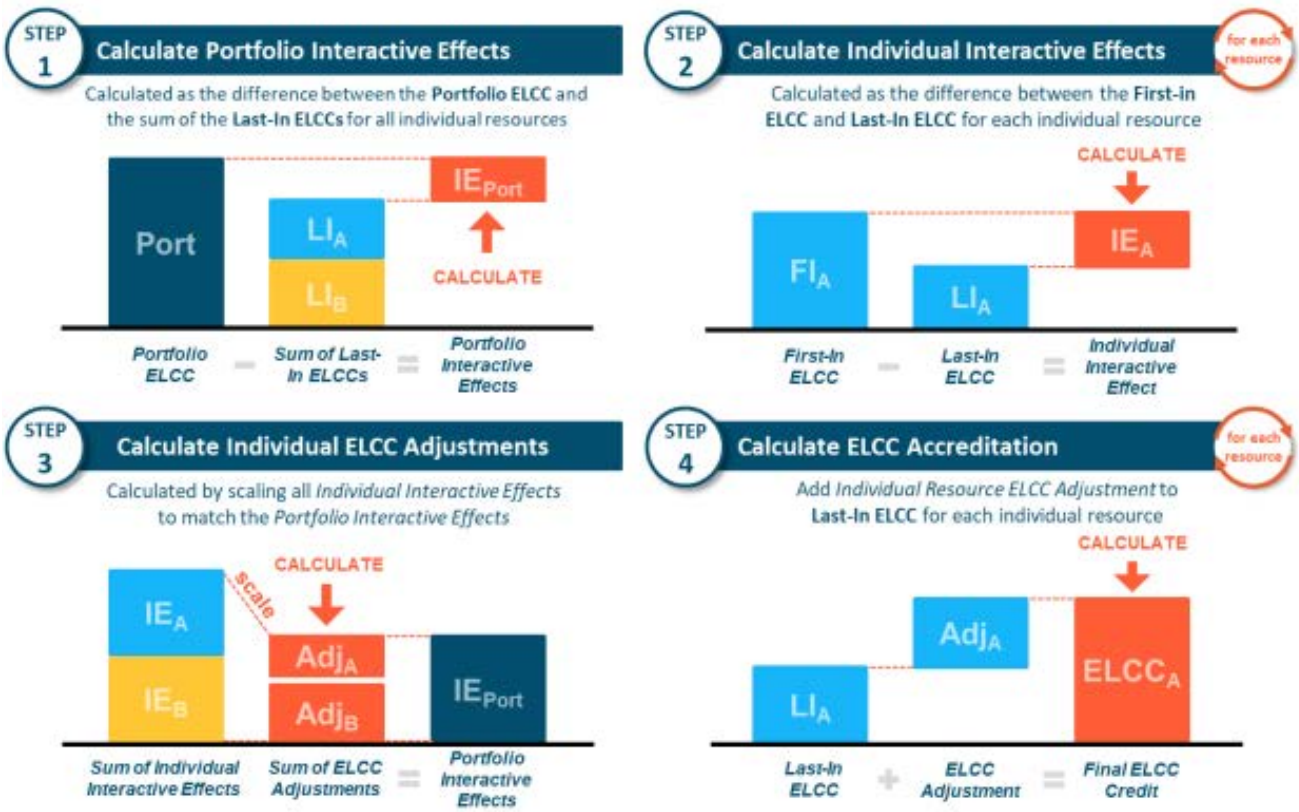
The steps of the Delta Method are as follows:

- **Calculate Portfolio Interactive Effects:** the difference between the portfolio ELCC and the sum of the Last-In ELCCs for all individual resources.
- **Calculate Individual Interactive Effects:** the difference between the First-In ELCC and the Last-In ELCC for each individual resource.
- **Calculate Individual ELCC Adjustments:** calculated by scaling all individual interactive effects to match the portfolio interactive effects.
- **Calculate ELCC Accreditation:** add individual resource ELCC adjustments to the Last-In ELCC for each individual resource to get the final ELCC credit.

Figure 4, sourced from E3's whitepaper, illustrates the four steps of the Delta Method described above, showing how the Portfolio, First-In, and Last-In ELCC values are combined to produce a final ELCC credit for each resource.

[8] E3, Practical Application of ELCC. Available at https://www.ethree.com/wp-content/uploads/2020/08/E3-Practical-Application-of-ELCC.pdf

Figure 4: Delta Method Illustration



Incremental ELCC Methodology

In addition to accrediting the existing fleet, ELCC values were developed for incremental additions of resources to inform the expansion planning process. Incremental ELCCs were calculated for wind, solar, 4HR storage, 8HR storage, pumped storage hydro, DR, and energy efficiency resources.

The incremental ELCC of each resource type was determined using a load addition approach, beginning from the 2029 base case near the 0.1 LOLE reliability target. For each resource type, incremental resource capacity was added to the system, which reduced LOLE below the base case level. Load was then added at several levels, and the resulting LOLE was recorded at each. The amount of load required to return the system to the base case LOLE was determined by interpolating LOLE across the load levels. That quantity of load is the accredited ELCC at that installed capacity level and dividing it by the block's nameplate capacity yields the ELCC percentage.

For solar and the three storage types, this process was repeated at increasing penetration levels, producing results at successive tranches. Solar was evaluated on its own, while each storage type was evaluated with solar co-added at a 2:1 solar-to-storage ratio. At each penetration, two ELCC measures were derived: an average ELCC, representing the cumulative contribution of the entire block up to that penetration, and a tranche ELCC, representing the marginal contribution of each successive increment. A curve was then fit to the tranche ELCC values as a function of incremental capacity for each of these resource types,

providing a continuous incremental ELCC curve across the studied penetration range. Wind was evaluated at discrete penetration levels without fitting a continuous curve, and DR and energy efficiency were each evaluated at a single incremental level.

Portfolio Reliability Verification Methodology

As part of the expansion plan modeling process, PNM developed candidate resource portfolios representing its CTP and HEG futures. Each portfolio was simulated in SERVM and results were compared to the 0.1 LOLE reliability target. The CTP and HEG portfolios were each simulated across the 2036, 2040, and 2045 study years.

For each portfolio and study year, the entire fleet of resources was modeled at the corresponding demand and energy requirements and the resulting system LOLE was calculated. Where a portfolio's LOLE deviated from the target of 0.1 LOLE, the amount of 4HR storage required to return the system to 0.1 LOLE was determined. This was done by simulating the portfolio across several 4HR storage adjustment levels, recording the resulting LOLE at each, and interpolating the storage quantity that yields 0.1 LOLE. Storage was added where the portfolio was unreliable, with an LOLE above 0.1, and removed where it was over-reliable, with an LOLE below 0.1. For portfolios and years where 4HR adjustments were identified, such amounts were tabulated; however, the expansion plan portfolios were not adjusted by those amounts of 4HR storage. In addition to the CTP and HEG portfolios, a stakeholder-proposed scenario portfolio was simulated across the same study years to verify its resulting LOLE.

12x24 heat maps showing the timing and magnitude of loss of load events for the CTP and HEG portfolios for all study years calibrated to 0.1 LOLE are provided in this report.

Resiliency Methodology

The resiliency analysis consisted of two parts. The first evaluates how the CTP and HEG expansion portfolios perform under extreme summer and winter weather. The second compares, for the CTP portfolio in 2036, how much resiliency benefit different technologies provide.

Portfolio Resiliency

To evaluate how the expansion portfolios perform under extreme weather conditions, a resiliency analysis was conducted for the CTP and HEG portfolios across 2036, 2040, and 2045 study years. The portfolios analyzed were those calibrated to 0.1 LOLE in the portfolio reliability analysis, including their 4HR storage adjustments.

Rather than simulating the full set of 45 weather years, this analysis isolates the impact of severe weather by simulating a single extreme week for each season. To identify these extreme timeframes, each week across the 45 weather years was characterized by two net load measures, where net load is system load net of wind and solar generation: (1) the maximum net load reached during the week and (2) the average of the daily peak net loads across the week. Weeks were ranked on each measure within their season, and

the two rankings were combined into an average rank to identify the most severe net load weeks. On this basis, the summer week selected was week 26 of 1994 and the winter week was week 5 of 2011.

Each portfolio, season, and study year combination was simulated under two market conditions: interconnected, in which the PNM system has access to market assistance from neighboring regions, and islanded, in which no market assistance is available. In the islanded cases, Tri-State regions remain included as they are modeled within the PNM Balancing Area (BA) as described in the **Study Topology and Regional Connectivity** section. Comparing the two isolates the reliability contribution of external support during stressed periods. Additionally, the islanded framework allows insight into how the system operates during extreme unserved energy events. One-hundred unit outage iterations were simulated for each case. EUE was the primary metric recorded, reported both weekly over the selected extreme week and on an annual basis, for the interconnected and islanded cases.

Resiliency Comparison of Different Technologies

The second part of the resiliency analysis compares how different resource technologies perform under extreme conditions when each is sized to provide the same reliability, using the CTP portfolio in the 2036 study year.

Starting from the CTP 2036 portfolio at 0.1 LOLE, 100 MW of load was added, raising LOLE above 0.1 days/year. Each of four technologies was then added to the system independently, in the amount required to return the system to 0.1 LOLE:

- LM6000 combustion turbine
- 4-hour storage
- Demand Response
- Solar and storage at a 2:1 solar-to-storage capacity ratio

For each technology, the capacity needed to restore 0.1 LOLE was determined by simulating the portfolio across several capacity levels and interpolating to the amount that returns the system to the target. Because every technology is sized to the same annual reliability, the scenarios differ only in the resource providing it, which isolates how each technology performs under stress.

Each scenario was then evaluated two ways. First, EUE was compared across a full simulation of all weather years. Second, EUE and system dispatch were compared during the extreme summer and winter weeks used in the portfolio resiliency analysis.

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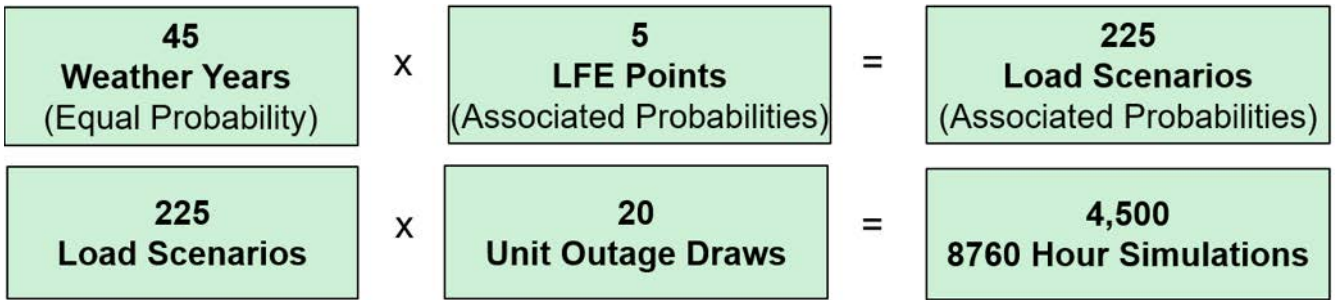
SERVM Model Inputs

SERVM Framework

Since reliability events are high impact and low probability, many scenarios must be considered to accurately assess the reliability of the PNM system. For this study, SERVM utilized 45 years of historical weather and load shapes spanning 1980 through 2024, 5 points of economic load growth forecast error, and a minimum of 20 Monte Carlo unit outage draw iterations for each scenario to represent a full distribution of realistic scenarios. The number of yearly simulation cases for each scenario is 45 weather years × 5 load forecast errors × 20 unit outage iterations = 4,500 total simulation cases for each scenario studied. Weather years and solar profiles were each given equal probability, while the load forecast error multipliers were given their associated probabilities as reported in the **Load Forecasts and Load Shapes** section.

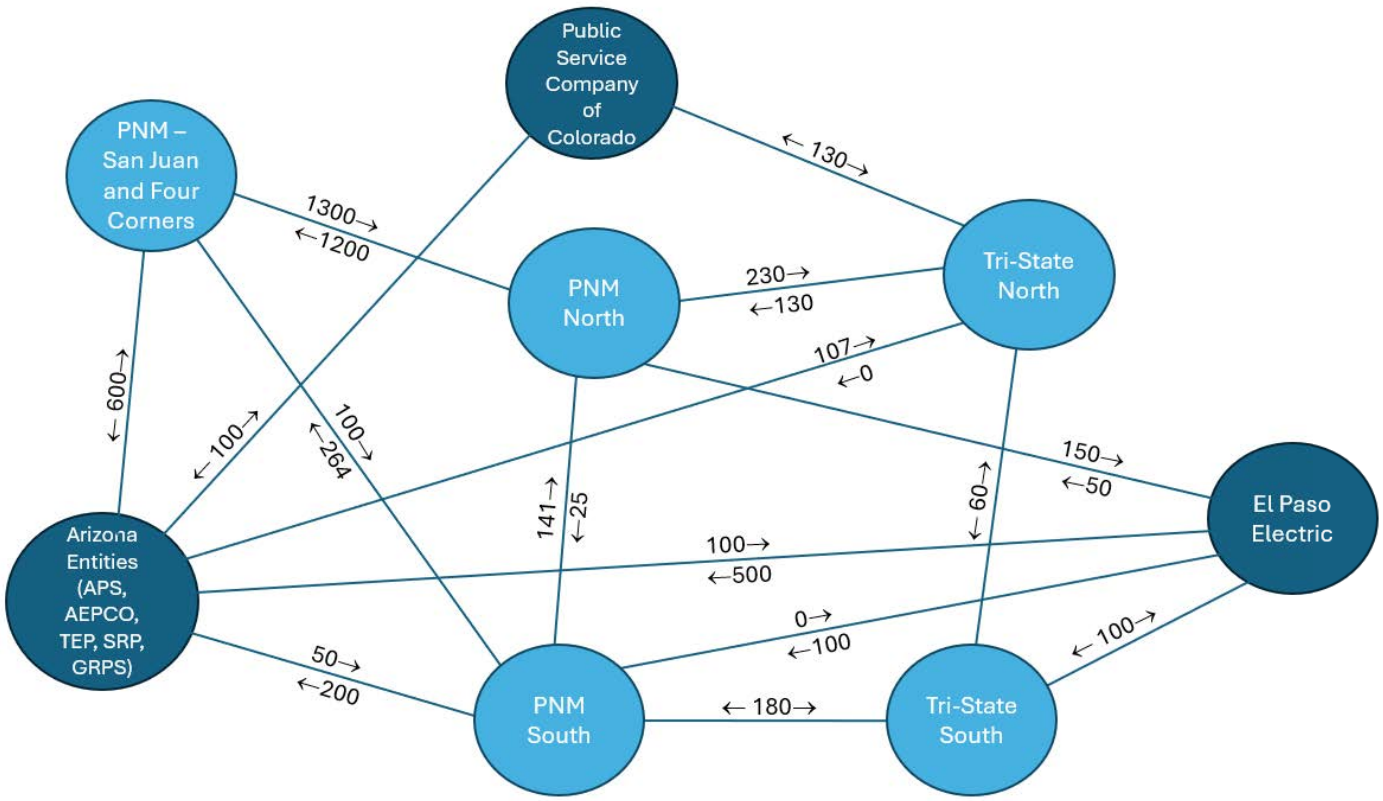
Figure 5: SERVM Uncertainty Framework



Study Topology and Regional Connectivity

The PNM BA and its tier-one neighbors were modeled as separate regions connected by transfer limits, as shown in **Figure 6**. The PNM BA comprises three internal zones — PNM North, PNM South, and PNM San Juan and Four Corners — and was committed and dispatched as a single region along with Tri-State North and Tri-State South. The Data Center and Economic Development loads were modeled in their own independent regions, but with effectively unlimited transmission to the PNM North region. Each tie between regions was modeled with a directional transfer limit in each direction.

Figure 6: Study Topology and Regional Connectivity



*All values in the figure are in MW.

The tier-one neighbors modeled were El Paso Electric (EPE), an aggregate Arizona region, Public Service Company of Colorado (PSCo), and Tri-State North and South. The neighboring regions were modeled in similar fashion to PNM and the loads and resources were all developed based on publicly available data from U.S. Energy Information Administration (EIA) Form 860, Federal Energy Regulatory Commission (FERC) Form 714, and publicly available IRPs. For Tri-State, the load forecast and resource assumptions were provided directly by PNM.

Aggregated Constraints

Aggregated constraints limit the total simultaneous import capability into the PNM BA from all neighbors. This modeling parameter reflects the assumption that PNM has historically experienced lower market assistance during periods when the surrounding region is also stressed. The non-winter aggregated constraints are unchanged from the prior PNM IRP. Winter aggregated constraints were added in this IRP cycle.

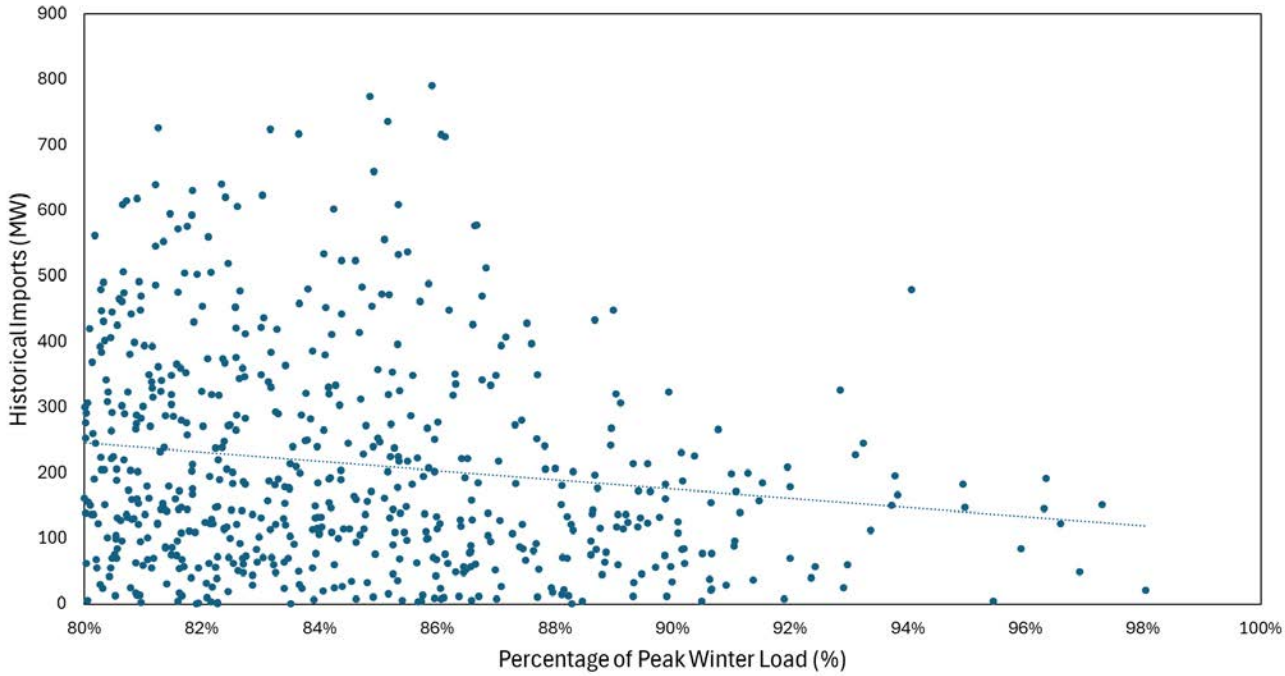
The non-winter aggregated constraints, carried forward from the prior IRP, are summarized in **Table 7**. The base constraint limits aggregate imports from all neighbors during high-load hours, and two additional constraints further restrict imports during the summer super-peak hours. The lower 80% threshold on hours 19 to 22 was applied because those hours have a gross load much less than peak daily load, ensuring the constraint still binds on peak load days.

Table 7: Non-Winter Aggregated Constraints

Constraint	Months	Hours	Gross Load Threshold	Import Limit (MW)
Base	All	All hours	≥ 85% of annual peak	200–300
Summer super-peak	June–August	16–18	≥ 85% of annual peak	100–150
Summer super-peak	June–August	19–22	≥ 80% of annual peak	50

New for the 2026 IRP, a winter aggregated constraint was added to better align modeled winter imports with historical winter import levels. The constraint was developed from historical hourly import data for the 2022 through 2025 winter seasons. **Figure 7** shows the imports observed during winter hours in which PNM was a net purchaser, plotted against the percentage of peak winter load. The observed imports rarely exceeded 800 MW and generally declined as load approached the winter peak. The winter constraint limits were selected to keep modeled winter imports consistent with these historically observed levels.

Figure 7: Historical Winter Imports



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The winter constraint applies during December, January, and February, and unlike the summer constraints, which are triggered at high load levels, it varies by time of day rather than by load level, as shown in **Table 8**. Import capability is most restricted during the evening and overnight hours (hours 18 through 7), when the surrounding region is also under winter stress, and least restricted during the midday hours (hours 10 through 15).

Table 8: Winter Aggregated Constraint

Hour of Day	Import Limit (MW)
18–7	250
8	400
9	600
10–15	800
16	600
17	400

Load Forecasts and Load Shapes

There are several loads served by the PNM BA in SERVM: PNM North, PNM South, the Economic Development load, and the Data Center load. The load forecast is presented here on a combined PNM basis, shown as the seasonal peak coincident load and total energy, with the Economic Development and Data Center portions shown separately. The forecasts are shown for the 2029, 2036, 2040, and 2045 study years and are inclusive of the Economic Development and Data Center loads. The 2029 CTP forecast serves as the base case, defined in the **Planning Reserve Margin** section, which is the foundation for the PRM and ELCC analyses.

Table 9: Seasonal Peak Load Forecast (MW)

Scenario	Year	Winter	Spring	Summer	Fall
CTP	2029	2,394	2,361	3,078	2,685
CTP	2036	2,573	2,519	3,254	2,821
CTP	2040	2,732	2,656	3,387	2,963
CTP	2045	2,930	2,843	3,600	3,161
HEG	2029	2,658	2,522	3,327	2,877
HEG	2036	2,997	2,815	3,691	3,165
HEG	2040	3,276	3,064	3,952	3,419
HEG	2045	3,614	3,368	4,338	3,756
Stakeholder	2029	2,393	2,343	3,047	2,661
Stakeholder	2036	2,605	2,445	3,148	2,738
Stakeholder	2040	2,787	2,587	3,257	2,801
Stakeholder	2045	3,007	2,796	3,504	2,992

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Table 10: Seasonal Energy Forecast (GWh)

Scenario	Year	Winter	Spring	Summer	Fall
CTP	2029	4,345	4,099	4,918	4,342
CTP	2036	4,616	4,318	5,172	4,490
CTP	2040	4,726	4,406	5,302	4,604
CTP	2045	4,930	4,571	5,500	4,778
HEG	2029	4,600	4,332	5,236	4,605
HEG	2036	5,083	4,753	5,729	4,945
HEG	2040	5,335	4,979	6,024	5,197
HEG	2045	5,731	5,338	6,449	5,556
Stakeholder	2029	4,329	4,071	4,887	4,318
Stakeholder	2036	4,569	4,237	5,085	4,426
Stakeholder	2040	4,667	4,299	5,190	4,521
Stakeholder	2045	4,856	4,436	5,360	4,675

The Economic Development and Data Center load forecasts are modeled on a monthly basis and are identical across the CTP, HEG, and Stakeholder scenarios. The Economic Development load ramps up through 2036 and is then held approximately constant, while the Data Center load is held approximately constant across all study years.

Table 11: Monthly Economic Development Peak Load Forecasts (MW)

Month	2029	2036	2040	2045
1	481	590	590	590
2	496	594	594	594
3	511	600	600	600
4	510	583	585	584
5	520	583	583	584
6	512	562	562	562
7	523	561	562	563
8	553	584	584	585
9	564	585	584	584
10	587	597	597	597
11	585	595	595	595
12	580	589	590	590

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Table 12: Monthly Economic Development Energy Forecasts (GWh)

Month	2029	2036	2040	2045
1	300	374	374	374
2	278	338	338	338
3	315	374	374	374
4	312	362	362	362
5	330	374	374	374
6	327	362	362	362
7	345	374	374	374
8	353	374	374	374
9	349	362	362	362
10	368	374	374	374
11	356	362	362	362
12	368	374	374	374

Table 13: Monthly Data Center Forecast

Month	Peak (MW)	Energy (GWh)
1	493	359
2	493	325
3	493	360
4	494	348
5	494	360
6	495	349
7	495	360
8	494	360
9	494	348
10	493	360
11	493	348
12	493	359

The load forecasts presented in this section reflect the expected load for each scenario and study year. As described in the Planning Reserve Margin and Existing ELCCs section, additional economic development load was added to calibrate the 2029 system to the 0.1 LOLE reliability target. The economic development load in the 0.1 LOLE calibrated run is therefore higher than the forecast values shown here.

The Data Center and Economic Development loads are each modeled with their own distinct daily load shape. The following figures show the daily shape of the Economic Development load and the Data Center load.

Figure 8: Average July Data Center Demand

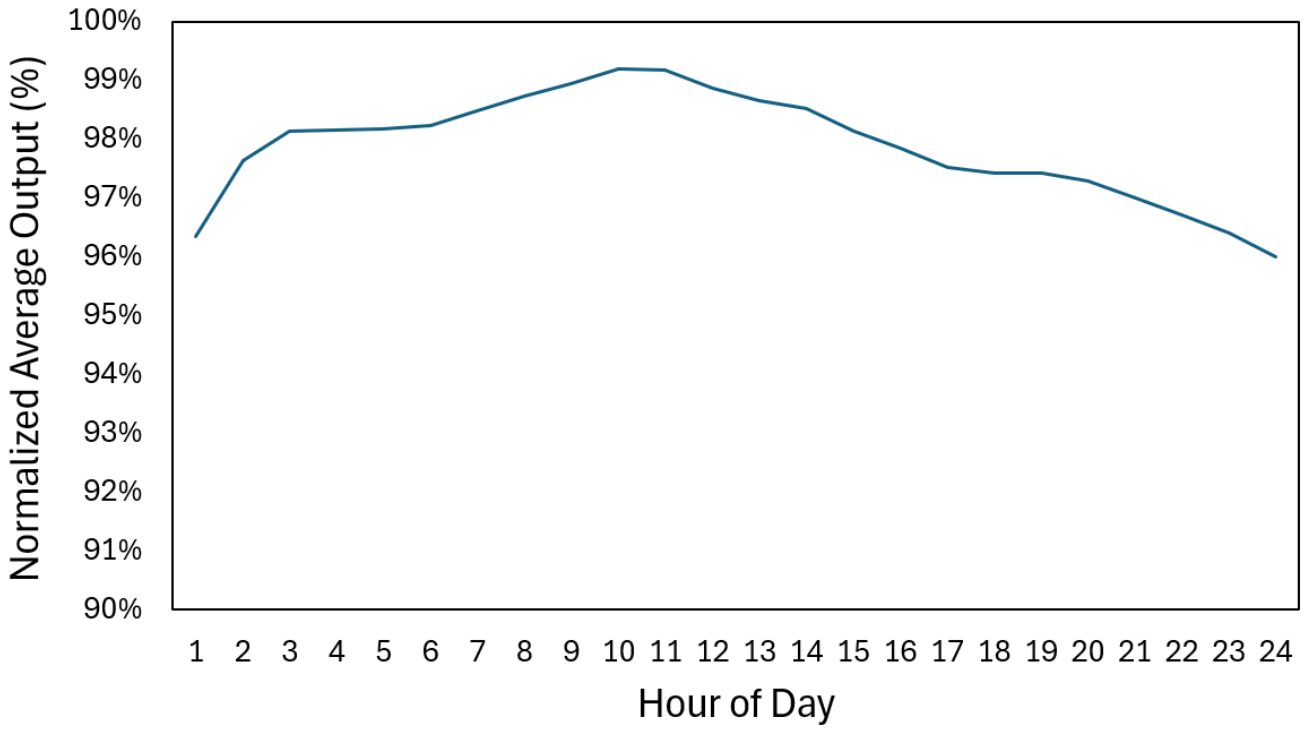
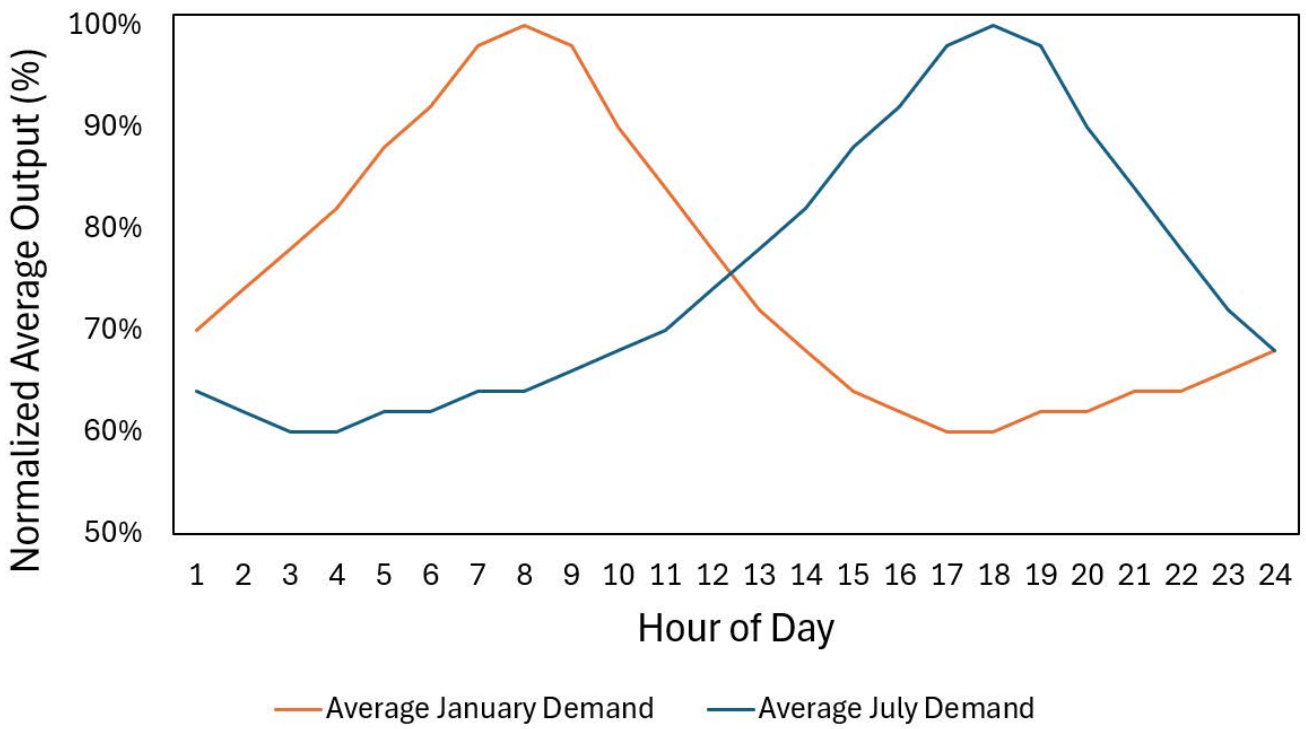


Figure 9: Average Economic Development Demand



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To determine the effects of weather uncertainty on PNM's load, 45 historical years of weather and load, spanning 1980 through 2024, were compiled. Based on this history, a neural network program was used to develop relationships between weather observations and load. For the 2026 IRP, neighboring electric utility historical load data was updated so that the regional data also aligns with PNM's history. Using the resulting relationships from historical data, synthetic load shapes were created to mimic those relationships when applied to PNM's load forecasts in its 2026 IRP. By using equal probabilities given to each weather year, and scaling of load shapes such that seasonal peaks align with load forecast projections, these 45 synthetic load shapes were tested and refined to validate that the historical data continues to show a consistent relationship between weather and expected loads.

Figure 10 and **Figure 11** show the results of the synthetic load modeling by displaying the peak load variance for the total PNM load in the winter and summer seasons. The y-axis represents the percentage deviation from the 50/50 load forecast, where zero corresponds to normal weather. The bars represent the variance in projected peak loads based on weather experienced during the historical weather years. The bars are arranged from the largest negative deviation to the largest positive deviation rather than in chronological order, so the figures should be read as the distribution of weather-driven outcomes around the forecast rather than as a trend over time. The tails indicate the most extreme conditions the historical record supports.

Higher variance of the load shapes directly corresponds to higher reserves needed to maintain reliability standards. Planning reserve margin is calculated using the 50/50 load forecast, so weather years that have higher variance over the median cause the system to need more reserves to meet the increased peak load risk in those weather years. These figures offer insight into the magnitude of the effect that weather uncertainty has on the peak load of the PNM system. The 2011 weather year is a significant driver in causing winter LOLE due to an extreme cold weather event occurring in New Mexico.

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Figure 10: Summer PNM Load Variance

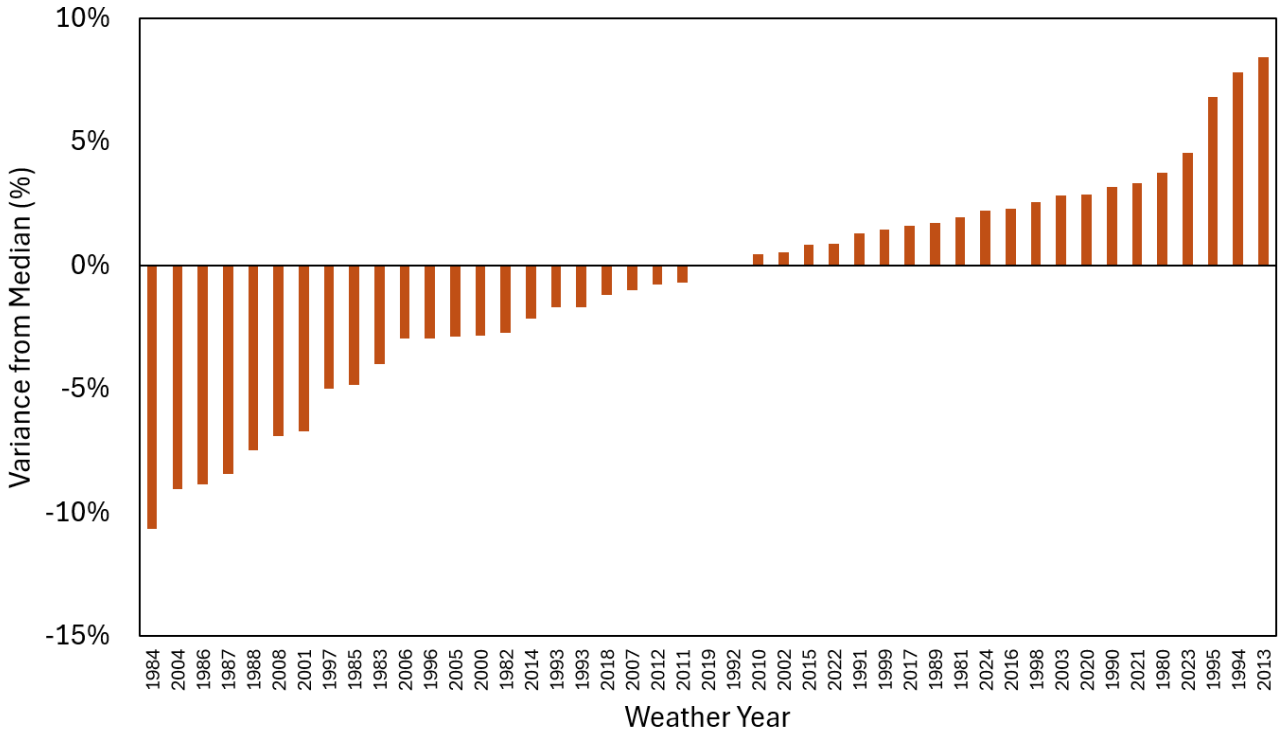
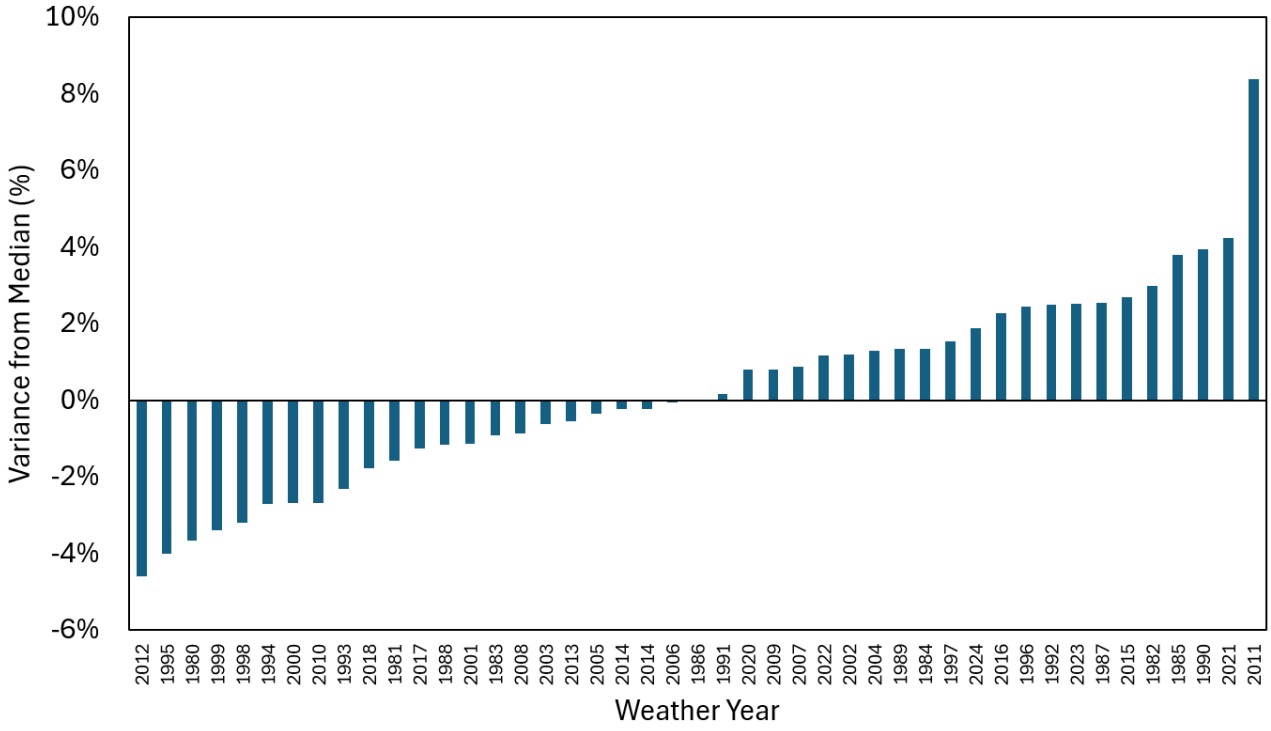


Figure 11: Winter PNM Load Variance



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Economic load forecast error multipliers were included to isolate the economic uncertainty that PNM may have in its long-term load forecasts. To estimate economic load forecast error, the difference between Congressional Budget Office (CBO) gross domestic product (GDP) forecasts and actual data was fit to a normal distribution. Using a normal distribution and assuming electric load grows at a slower rate than GDP, a multiplier was applied to the raw CBO forecast error distribution. The resulting multipliers and probabilities are shown in **Table 14**. As an illustration, 11% of the time load is expected to be under-forecasted by 4%. Lastly, each of these five load forecast error points was applied to each of the 45 weather years to create 225 synthetic load shapes.

Table 14: Economic Load Forecast Error

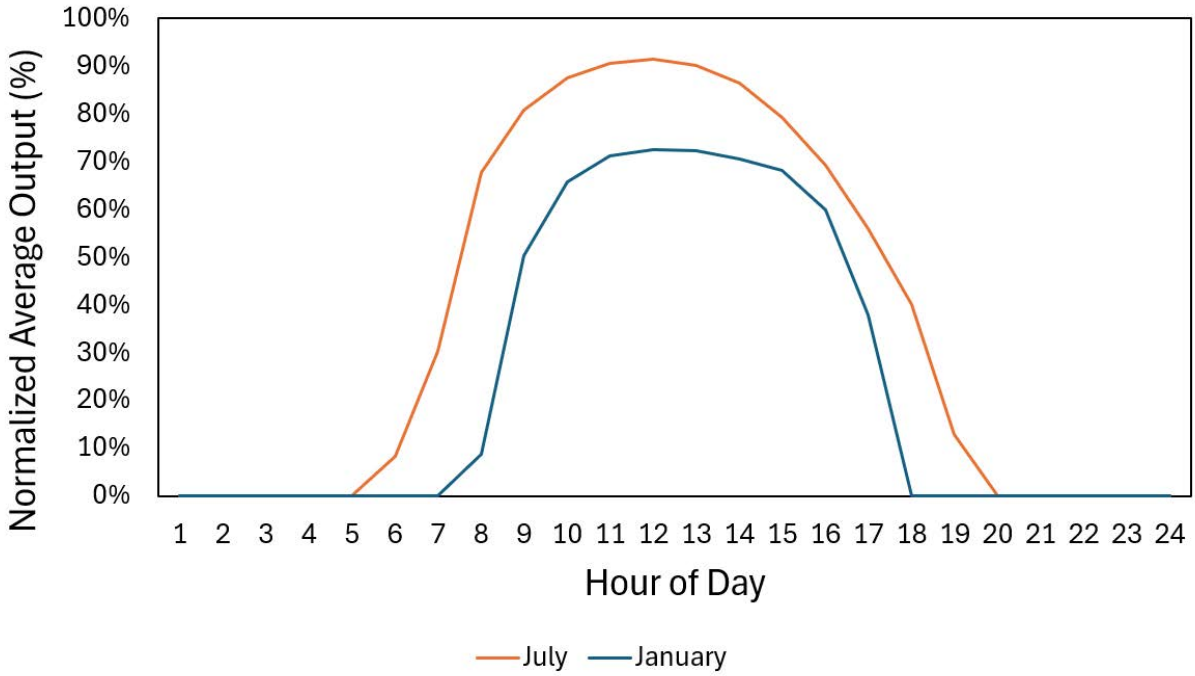
Load Forecast Error Multiplier	Probability (%)
0.96	11%
0.98	23%
1.00	32%
1.02	23%
1.04	11%

Solar Shapes

Solar data was downloaded from the National Renewable Energy Laboratory (NREL) National Solar Radiation Database (NSRDB) for the latitude and longitude of each of PNM's existing resource locations, for the years 1998 through 2022. Using multiple locations incorporates geographic diversity among the solar projects. The NSRDB data, which includes variables such as air temperature, dew point, global, direct, and diffuse irradiance, wind speed, surface pressure, and surface albedo, was input into NREL's System Advisor Model (SAM) for each year and location to generate hourly solar profiles for both fixed and single-axis tracking photovoltaic (PV) plants. Each solar array was modeled at a 10-degree tilt and a 180-degree (due south) azimuth. The resulting SAM output was normalized to a per-unit profile, which served as the basis for the 1998 through 2022 solar profiles. Solar profiles for the weather years outside this range, 1980 through 1997 and 2023 through 2024, were constructed from the 1998 through 2022 data using load day matching, in which daily load shapes in the years without data were compared to daily load shapes in the years with data and the solar profiles from the closest-matching days were used.

Figure 12 shows the resulting normalized aggregate solar profiles from the 2029 base case, plotted as the average daily output for January and July.

Figure 12: Average PNM Base Case Solar Output



The latitude and longitude of the PNM solar profile locations are listed in **Table 49** in the **Appendix**. The same process was used to create solar profiles for the neighboring regions, whose locations are listed in **Table 50** in the **Appendix**. For future generic solar, a solar profile was created using the normalized final output of the existing tracking solar from the base case.

Wind Shapes

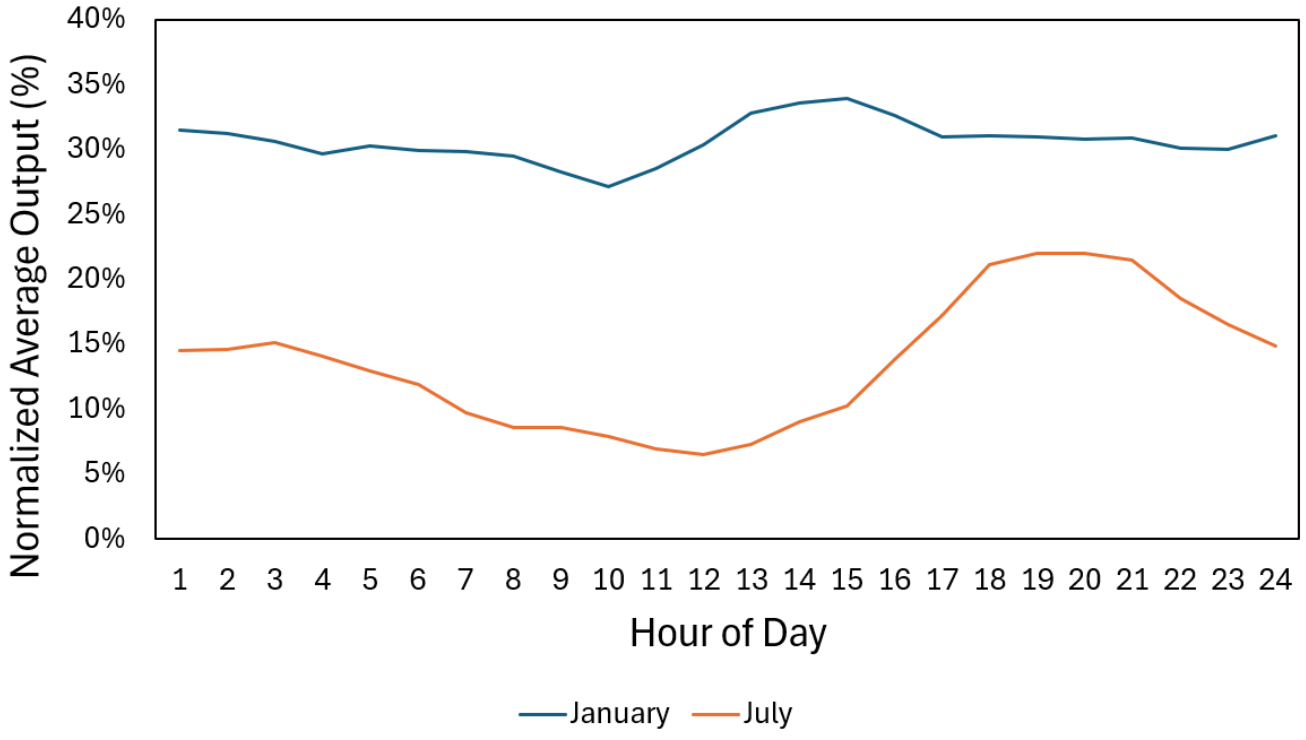
The 1980 through 2024 wind profiles for PNM were developed from historical wind data from the Casa Mesa, La Joya 1, La Joya 2, New Mexico Wind Energy Center (NMWEC), and Red Mesa wind farms, covering the period from April 1, 2021 through December 31, 2024. Synthetic profiles for each weather year were created using a peak load day matching approach: for each day in the weather year being constructed, the day with the closest peak load within five days before or after that calendar day was identified from the April 1, 2021 through December 31, 2024 historical data, and that day's wind profile was used. For example, July 16 in the 1994 profile was matched by examining each July 11 through July 21 day in the historical data, selecting the day with the closest peak load, and using that day's wind output. The resulting daily profiles were smoothed between days, and the final normalized profiles were used in SERVM.

For the NMWEC profile, synthetic profiles were created for both the NMWEC and Casa Mesa sites and then summed, subject to a cap of 200 MW.

The PNM expansion wind profile was developed using the SERVM Wind Diversity Tool. This tool adjusts a region's wind generation profile so that the correlation between the wind output of two regions matches a target correlation, reflecting the diversity of wind resources across areas rather than assuming wind output is fully coincident or fully independent. The tool reaches the target by repeatedly swapping individual days within the same calendar month across years, keeping only those swaps that move the wind correlation closer to the target. The expansion wind profile was created from the La Joya 2 profile and adjusted to a 0.80 correlation with the La Joya 1 profile.

The average daily aggregate PNM wind output for the 2029 base case is shown for January and July in **Figure 13**.

Figure 13: Average PNM Base Case Wind Output



Wind profiles for the neighboring Arizona and PSCo regions were developed from historical hourly wind output for each region over 2019 through 2023. Each year's output was normalized to a 0 to 100 scale relative to that year's maximum hourly generation. Synthetic profiles for the 1980 through 2024 weather

years were then created through load day matching against the SERVM synthetic load profiles: each synthetic day was paired with the historical days whose load most closely matched, and one of the closest matching days was selected at random to supply that day's normalized wind output. Multiple independent samplings were produced for each region and assigned across that region's wind units, so that units within a region draw on different random selections rather than an identical profile.

Conventional Thermal Resources and Resource Mix

Conventional thermal resources owned by PNM and contracted for via Power Purchase Agreements were modeled for the 2029 study year. These resources are economically committed and dispatched to load on a 5-minute basis respecting all unit constraints including startup times, ramp rates, minimum up times, minimum down times, and shutdown times. All thermal resources are allowed to serve regulation, spinning, and load following reserves assuming the minimum capacity level is less than the maximum capacity. The PNM base case system resource mix and respective Equivalent Forced Outage Rates (EFORs) are provided in **Table 15** below.

Table 15: 2029 Base Case Resource Mix and EFOR

Unit Type	Capacity (MW)	EFOR (%)
Battery	1,950	7.5%
Combined Cycle	425	5.5%
Combustion Turbine	786	2.7%
Demand Response	35	-
Geothermal	11	24.0%
Nuclear	288	2.0%
Solar	2,412	-
Steam Turbine Coal	200	20.0%
Steam Turbine Gas	145	9.1%
Wind[9]	1,408	-
Total	7,660	

EFORs are based on historical performance or expected future performance provided by PNM. Unlike typical production cost models, SERVM does not use an EFOR for each unit as an input. Instead, historical Generating Availability Data System (GADS) data from 2019–2024 are used to create an outage probability

[9] 50MW Casa Mesa wind is modeled within the NWWEC wind unit in SERVM due to real world transmission constraints, so the actual capacity of the system is 1,458MW, but it is modeled at 1,408MW.

distribution for each unit and SERVM randomly draws from this distribution for each unit to simulate outages. Units without historical data use data from similar units. Outage distributions were scaled to an expected EFOR provided by PNM. Outage distributions are constructed using the following variables.

Full Outage Modeling

- Time-to-Repair Hours
- Time-to-Fail Hours
- Start Probability

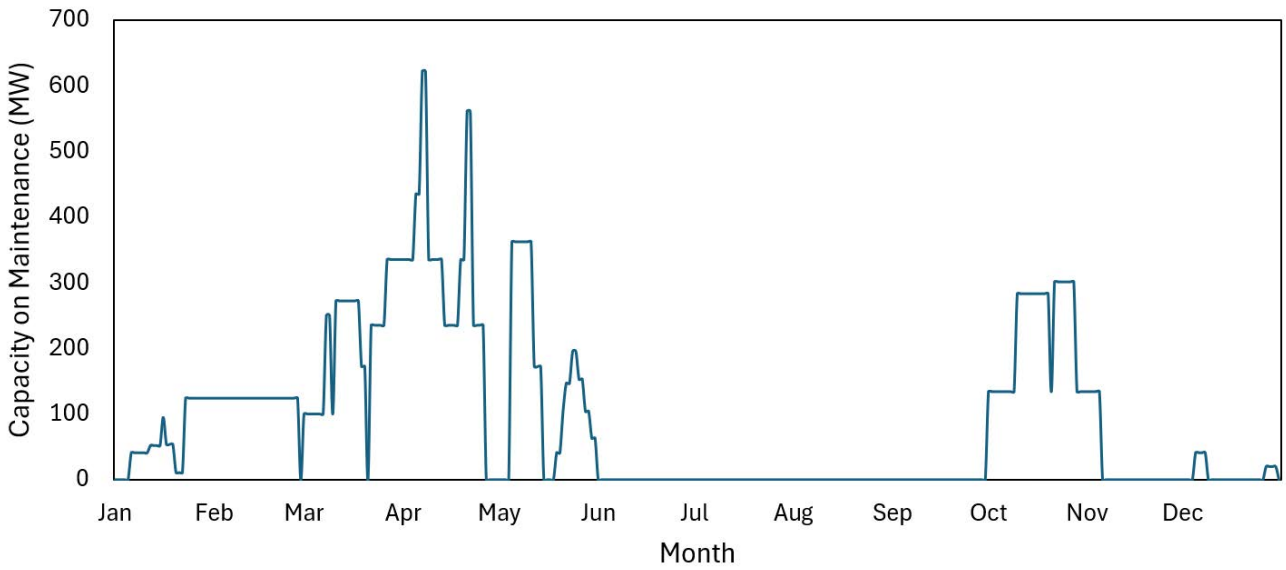
Partial Outage Modeling

- Partial Outage Time-to-Repair Hours
- Partial Outage Derate Percentage
- Partial Outage Time-to-Fail Hours

Planned Maintenance

Planned maintenance outage rates were applied to relevant units. These outage rates were provided by PNM where available and otherwise from publicly available data for the applicable technology. Before the simulation begins, SERVM's maintenance scheduler converts the outage rates into a target number of outage days per year and determines when those days are placed. Candidate windows are ranked by daily system load, by default using the average daily load across the selected net load shapes, and each unit's maintenance is assigned to the lowest load periods available in order to minimize stress on the system during outages. Units are scheduled in descending order of capacity, so that the largest generators, which have the greatest impact on reliability, are placed first into the lowest load windows. The result of this scheduling step is a fixed daily maintenance calendar for every unit. During the Monte Carlo simulation, SERVM enforces these calendars deterministically: each unit is removed from the commitment and dispatch queues on its maintenance start day and returned to service when its window ends. Throughout that period the unit contributes zero capacity with timing that has been deliberately placed in low load periods. The scheduled planned maintenance across the base case is shown in **Figure 14**.

Figure 14: PNM Planned Maintenance Schedule



Battery Modeling

Battery energy storage units were modeled with maximum combined output capacity (if applicable) and round-trip losses consistent with known project information and are economically scheduled and dispatched within SERVM. These resources typically charge during low net demand periods, subject to constraints, and are dispatched during net peak load periods. 4-hour storage units were modeled assuming an EFOR of 7.5%, which is an assumption based on a study conducted by E3[10] on the real-world first-year operation of utility-scale battery energy storage facilities located in California.

Demand Response Modeling

DR programs were modeled as resources in SERVM with specific contract limits. The sections below provide modeling characteristics for each of the modeled programs.

- **Battery Energy Storage Direct Load Control:** This program is modeled as two seasonal resources. PNM sends a dispatch signal that discharges (or curtails charging of) enrolled residential, commercial, and industrial batteries during an event. Events run one per day with a duration of two

[10] https://www.aps.com/-/media/APS/APSCOM-PDFs/About/Our-Company/Doing-business-with-us/Resource-Planning-and-Management/APS-RPAC-Meeting-Presentation-102622.ashx?la=en&hash=9AE20E699D178AFCF8AB30BF9C64FFED

to four hours. The summer resource is limited to 35 call hours per year and the winter resource to 30 call hours per year.

- **Domestic Hot Water Heater Direct Load Control:** Modeled as two seasonal resources representing residential electric resistance and heat pump water heaters under one-way utility control. Each season allows up to 25 events per year at 4 hours per event, for 100 call hours per year, dispatched once per day. The summer and winter resources use the same event structure; the seasonal difference is in per participant load impact, which is carried in the capacity rather than the event parameters.
- **Peak Saver:** A year-round program for non-residential customers with peak load contributions of at least 150 kW, modeled as two seasonal resources with 4-hour events dispatched once per day. The summer resource is available June through September with up to 100 call hours per year, and the winter resource is available October through May with up to 300 call hours per year.
- **Power Saver:** A summer-only resource for residential and small-to-medium commercial customers, available June through September. It is dispatched once per day in 4-hour events for up to 100 call hours per year.
- **Behavioral:** A residential program modeled as a resource that is called on the roughly 11 highest peak days of the year. Events run 3 to 5 hours within the 1 p.m. to 7 p.m. peak window, one per day, for approximately 40 call hours per year.

Load Modifiers

Some of the units were modeled as Load Modifier (L) units to represent adjustments to the system load profile. In SERVM, Load Modifier units are used to capture expected changes in load composition. Each Load Modifier unit is associated with a weather station and a capacity multiplier table, which uses historical hourly weather data to determine the unit's hourly load shape. For this study, the hourly load shapes for the Load Modifier units were provided by PNM and used to represent the study-specific load adjustments and calibration assumptions. Energy Efficiency and Time of Day resources were modeled as L units in this analysis.

Ancillary Services

SERVM commits resources to meet energy needs plus ancillary service requirements, which are defined as SERVM model inputs. In real-world operation, these ancillary services are needed for uncertain

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movement in net load or sudden loss of generators during the simulations. Within SERVM, these include regulation up and down, which are served by units with automatic generation control (AGC) capability, spinning reserves, load following reserves, and quick start reserves. **Table 16** shows the definition of each ancillary service for this study. A loss of load event was recorded when there was insufficient generation to serve load plus the regulation up requirement.

Table 16: Ancillary Service Definitions

Ancillary Service	Definition
Regulation Down Requirement	10 Minute Product served by units with AGC capability
Regulation Up Requirement	10 Minute Product served by units with AGC capability
Spinning Reserves Requirement	10 Minute Product served by units that have minimum load less than maximum load
Load Following Down Reserves	10 Minute Product served by units that have minimum load less than maximum load
Load Following Up Reserves	10 Minute Product served by units that have minimum load less than maximum load
Load Following Up Range Adder	Additional upward load-following reserve above the minimum Load Following Up Reserve requirement.
Load Following Min Up Reserves Target	Minimum additional upward load-following reserve maintained above the spinning reserve requirement.
Quick Start Reserves Requirement	Served by units that are offline and have quick start capability
Quick Start Reserves Target	Target amount of quick-start (non-spinning) reserve capacity maintained each hour.

For this study, these ancillary service requirements were applied to the PNM BA, with each requirement specified as a percentage of load. Regulation up and regulation down were each set at 6% of load, and a quick start reserves target of 4% of load was applied.

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Results

Planning Reserve Margin and Existing ELCCs

The existing resource fleet was accredited on an ELCC basis using the methodologies described in the Study Methodology section. The Delta Method was applied to the existing wind, solar, battery storage, and demand-side resources, and a thermal ELCC analysis was used to accredit the conventional thermal fleet as described in the Executive Summary. The resulting ELCC values are shown below.

Table 17: Existing ELCCs

Category	ICAP (MW)	ELCC (%)
Battery	1,950	75%
Solar	2,412	19%
Wind	1,408	12%
Demand Response	35	59%

Table 18: Thermal ELCCs

Category	ICAP (MW)	ELCC (%)
Combined Cycle	425	92%
Combustion Turbine	786	98%
Nuclear	288	94%
Steam Turbine Coal	200	72%
Steam Turbine Gas	145	92%

The full accreditation is shown in **Table 19**.

Table 19: Resource Accreditation (Average ELCC by technology)

Unit Category	ICAP (MW)	ELCC (%)	Accreditation (MW)
Battery	1,950	75%	1,471
Combined Cycle	425	92%	393
Combustion Turbine	786	98%	774
Demand Response	35	59%	21
Geothermal	11	76%	8
Nuclear	288	94%	271
Solar	2,412	19%	458
Steam Turbine Coal	200	72%	143
Steam Turbine Gas	145	92%	133
Wind	1,408	12%	169
Total			**3,841**

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The resulting reserve margins are summarized below. At the base case peak load, the system carries an as-is reserve margin of 24.8%. This initial set of existing resources assumed additional gas resources PNM had identified in its 2029–2032 System Resources application filed with the NMPRC in mid-2026. PNM utilized generic gas resources to serve as placeholders until it determines actual resources that PNM intends to procure, following evaluation of RFP bids it plans to receive in the second half of 2026. Economic development load was added to calibrate the system to 0.1 LOLE, and each resource was accredited at its ELCC to determine the PRM. Calibrated to the 0.1 LOLE target, the PRM is 14.5%. This target PRM was then used as the basis for PNM's capacity expansion plans in the 2026 IRP.

Table 20: Reserve Margin Summary

Metric	Value
Total accredited capacity (MW)	3,841
Base case peak load (MW)	3,078
As-is reserve margin	24.8%
0.1 LOLE peak load (MW)	3,354
0.1 LOLE reserve margin	14.5%

The timing of the loss of load events and expected unserved energy from the base case calibrated to 0.1 LOLE are shown in **Table 21** and **Table 22** below. These tables represent the percentage of total loss of load hours (LOLH) and EUE found in the given hour-month combination. A value of 1%, for example, indicates that 1% of the total LOLH or EUE occurred in the given hour within the simulations.

Table 21: 2029 Base Case LOLH Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	-	0.1%	-	-	-	0.5%	0.1%	-	-	-	-	0.1%	**0.8%**
2	-	0.2%	-	-	-	0.3%	0.1%	-	-	-	-	0.1%	**0.6%**
3	-	0.2%	-	-	-	0.2%	-	-	-	-	-	0.1%	**0.5%**
4	-	0.4%	-	-	-	0.0%	-	-	-	-	-	0.2%	**0.6%**
5	-	0.5%	-	-	-	-	-	-	-	-	-	0.6%	**1.1%**
6	0.2%	1.6%	-	-	-	-	-	-	-	-	-	1.3%	**3.1%**
7	0.4%	4.1%	-	-	-	-	-	-	-	-	-	3.4%	**7.9%**
8	0.5%	5.3%	-	-	-	-	-	-	-	-	-	5.2%	**11.0%**
9	0.2%	1.9%	-	-	-	-	-	-	-	-	-	2.0%	**4.1%**
10	-	0.3%	-	-	-	-	-	-	-	-	-	0.5%	**0.8%**
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	**0.0%**
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	0.0%	0.0%	-	-	-	-	**0.1%**
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	0.0%	0.3%	0.0%	-	-	-	-	**0.4%**
18	-	-	-	-	-	-	0.7%	0.1%	0.0%	-	-	-	**0.8%**
19	-	-	-	-	-	8.8%	11.9%	2.2%	-	-	-	0.0%	**23.0%**
20	-	-	-	-	-	17.3%	16.5%	1.8%	-	-	-	0.0%	**35.6%**
21	-	0.0%	-	-	-	4.4%	1.9%	0.2%	-	-	-	0.2%	**6.7%**
22	-	0.0%	-	-	-	0.6%	0.3%	0.0%	-	-	-	0.3%	**1.2%**
23	-	0.0%	-	-	-	0.2%	0.1%	0.0%	-	-	-	0.3%	**0.7%**
24	-	0.0%	-	-	-	0.6%	0.1%	0.0%	-	-	-	0.3%	**1.1%**
Total	**1.3%**	**14.7%**	-	-	-	**33.0%**	**31.9%**	**4.3%**	**0.0%**	-	-	**14.7%**	**100.0%**

Table 22: 2029 Base Case EUE Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	-	0.1%	-	-	-	0.6%	0.1%	-	-	-	-	0.2%	**1.0%**
2	-	0.2%	-	-	-	0.1%	0.0%	-	-	-	-	0.4%	**0.8%**
3	-	0.3%	-	-	-	0.0%	-	-	-	-	-	0.5%	**0.8%**
4	-	0.7%	-	-	-	0.0%	-	-	-	-	-	0.8%	**1.5%**
5	-	1.9%	-	-	-	-	-	-	-	-	-	1.8%	**3.7%**
6	0.2%	4.8%	-	-	-	-	-	-	-	-	-	4.8%	**9.8%**
7	1.2%	14.6%	-	-	-	-	-	-	-	-	-	12.7%	**28.5%**
8	1.7%	13.2%	-	-	-	-	-	-	-	-	-	13.1%	**28.0%**
9	0.2%	1.4%	-	-	-	-	-	-	-	-	-	1.9%	**3.5%**
10	-	0.0%	-	-	-	-	-	-	-	-	-	0.3%	**0.3%**
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	**0.0%**
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	0.0%	0.0%	-	-	-	-	**0.0%**
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	0.0%	0.0%	0.0%	-	-	-	-	**0.0%**
18	-	-	-	-	-	-	0.1%	0.0%	0.0%	-	-	-	**0.1%**
19	-	-	-	-	-	1.3%	1.9%	0.4%	-	-	-	0.1%	**3.7%**
20	-	-	-	-	-	6.0%	4.0%	0.5%	-	-	-	0.2%	**10.8%**
21	-	0.1%	-	-	-	1.3%	0.8%	0.1%	-	-	-	0.5%	**2.6%**
22	-	0.1%	-	-	-	0.2%	0.1%	0.1%	-	-	-	0.6%	**1.1%**
23	-	0.1%	-	-	-	0.9%	0.2%	0.0%	-	-	-	0.8%	**1.9%**
24	-	0.0%	-	-	-	1.4%	0.1%	0.0%	-	-	-	0.2%	**1.9%**
Total	**3.3%**	**37.5%**	-	-	-	**11.8%**	**7.5%**	**1.1%**	**0.0%**	-	-	**38.9%**	**100.0%**

As shown in the heat maps, approximately 70% of PNM's LOLH falls in the summer months. These events are concentrated in hours 19 and 20, when net load peaks as solar generation falls offline and load remains high. Conversely, approximately 80% of the EUE falls in the winter months, concentrated in the morning hours 6, 7, and 8. While LOLE is significantly more frequent in summer months, when PNM's load is highest, the most severe events fall in the winter months. PNM's winter events tend to be more severe in magnitude because they are related to PNM's energy limmited resources running out of energy due to prolonged periods of high demand without the ability to charge using solar generation through the night. PNM's summer LOLE is generally related to the lack of capacity to meet higher loads, while winter LOLE is generally related to the lack of energy available to charge storage through low renewable generation.

Transmission Sensitivity

An additional sensitivity was performed to evaluate the reliability benefit of increased summer import capability. In this sensitivity, the import capacity during the summer peak hours was doubled from 50 MW to 100 MW. The additional import allowance produced an approximate 40 MW reliability benefit, which translates to a reduction of roughly 1.4 percentage points in the PRM, from 14.5% to 13.1%.

The benefit is less than the full 50 MW increase in the import allowance. This indicates that during some of the risk hours the binding constraint is the availability of resources in neighboring regions rather than the import limit itself, so the additional import allowance is not always deliverable.

Incremental ELCCs

Incremental ELCC values were developed for solar, wind, 4HR storage, 8HR storage, PSH, DR, and energy efficiency using the methodology described in the Study Methodology section. The incremental ELCC values reflect the marginal accreditation of each technology as penetration increases. Solar and wind results are reported as standalone additions, while the storage results assume a solar buildout at a 2:1 solar-to-storage ratio. DR and energy efficiency were each evaluated at a single incremental level rather than across a range of penetrations. DR was evaluated at an incremental MW level of 50 MW and energy efficiency was evaluated at an incremental MW level of 100 MW.

Table 23: Incremental Solar ELCC

Incremental Solar (MW)	Average ELCC (%)	Tranche ELCC (%)
800	3%	3%
1,600	2%	<1%
2,400	1%	<1%
3,200	1%	<1%
4,000	1%	<1%

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Table 24: Incremental Wind ELCC

Incremental Wind (MW)	Average ELCC (%)	Tranche ELCC (%)
500	8%	8%
1,000	5%	2%

Table 25: Incremental Storage Tranche ELCC

Incremental Storage (MW)	4HR	8HR	PSH
400	42%	58%	74%
800	26%	42%	61%
1,200	22%	28%	43%
1,600	—	26%	37%
2,000	—	26%	38%

Table 26: Incremental Demand Response and Energy Efficiency ELCC

Resource	ELCC (%)
Demand Response	63%
Energy Efficiency	50%

Portfolio Reliability Verification

PNM developed candidate expansion portfolios for the CTP and HEG futures across 2036, 2040, and 2045 study years, along with a stakeholder-proposed scenario portfolio. Each portfolio was simulated in SERVM to verify its reliability against the 0.1 LOLE target. The portfolio compositions are presented first, followed by the reliability results.

Table 27: CTP Portfolio

Technology	2036	2040	2045
Solar	2,910	3,053	2,440
Wind	1,356	1,356	800
Short Duration Storage	2,250	2,285	2,248
Long Duration Storage	100	100	100
Combined Cycle	425	425	—
Combustion Turbine	654	487	338
Steam Turbine	146	146	—
Linear Generator	—	120	160
Nuclear	288	288	1,310
Geothermal	11	11	—
Demand Response	45	49	52
Energy Efficiency	403	454	377
Load Forecast	**3,583**	**3,711**	**3,814**

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Table 28: HEG Portfolio

Technology	2036	2040	2045
Solar	3,460	3,623	3,049
Wind	1,555	1,555	999
Short Duration Storage	2,406	2,406	2,345
Long Duration Storage	300	300	300
Pumped Storage Hydro	100	100	100
Combined Cycle	425	425	—
Combustion Turbine	654	487	338
Steam Turbine	146	146	—
Linear Generator	—	280	440
Nuclear	288	288	1,310
Geothermal	11	11	—
Demand Response	45	49	52
Energy Efficiency	403	454	377
Load Forecast	**4,048**	**4,326**	**4,609**

Table 29: Stakeholder Proposed Scenario Portfolio

Technology	2036	2040	2045
Solar	2,524	2,425	1,875
Wind	1,356	1,356	1,062
Short Duration Storage	2,273	2,273	1,947
Long Duration Storage	—	—	200
Combined Cycle	425	425	—
Combustion Turbine	482	315	—
Steam Turbine	146	146	—
Nuclear	288	288	1,310
Geothermal	361	361	350
Demand Response	174	258	363
Energy Efficiency	403	454	377
Load Forecast	**3,488**	**3,557**	**3,673**

Each portfolio was simulated across the 2036, 2040, and 2045 study years to determine its LOLE relative to the 0.1 target. For the CTP and HEG portfolios, the incremental 4HR storage adjustment required to bring each portfolio to 0.1 LOLE was also determined. A negative adjustment indicates the portfolio was over-reliable and storage could be removed, and a positive adjustment indicates additional storage was needed.

Table 30: CTP Reliability Results

Study Year	LOLE (days/year)	EUE (MWh)	Estimated Reserve Margin (%)	4HR Adjustment for 0.1 LOLE (MW)
2036	0.05	38	18.8%	−170
2040	0.23	221	13.6%	+285
2045	0.08	99	14.2%	−90

In 2036 the CTP portfolio exceeds the reserve margin target, at 18.8% against the 14.5% target; the portfolio determination in the expansion planning model allows the reserve margin to exceed the PRM where doing so minimizes 20-year net present value. In 2040 the portfolio is underbuilt relative to the target, at 13.6%. In 2045, the estimated reserve margin implies a higher LOLE than the results show. This result indicates a minor disconnect between the ELCCs and the actual reliability contribution of resources. In 2045, as significant nuclear capacity is added and existing wind and solar retire, the average reliability contribution of the remaining renewable and storage resources likely experiences a small increase, leading to the underestimation of the total firm capacity of the portfolio. This effect also occurs in the HEG portfolio for the 2045 study year.

Table 31: HEG Reliability Results

Study Year	LOLE (days/year)	EUE (MWh)	Estimated Reserve Margin (%)	4HR Adjustment for 0.1 LOLE (MW)
2036	0.05	34	18.6%	−230
2040	0.11	80	15.2%	+20
2045	0.03	19	15.1%	−190

The HEG portfolio follows a similar pattern, exceeding the reserve margin target in 2036 at 18.6%, and sitting near the target in 2040 at 15.2% and 2045 at 15.1%.

Heat maps illustrating the timing and severity of each portfolio and study year combination are provided below. In the 2029 base case, LOLH and EUE point in opposite seasonal directions. LOLH is predominantly a summer risk (69% summer, 31% winter), while EUE is already weighted toward winter (20% summer, 80% winter); summer events are frequent but shallow, and winter events are fewer but deeper. The CTP portfolio sees both metrics decisively move into winter with later study years. LOLH inverts from being led by summer to being led by winter by the 2036 study year (24% summer, 76% winter) and becomes almost entirely a winter risk by 2040 (2% summer, 98% winter), holding through 2045. EUE moves from 80% winter in the base case to 94% by 2036 and roughly 99% by 2040, so effectively all unserved energy becomes a winter event.

The HEG portfolio also shifts EUE risk toward winter, but less completely and not monotonically. LOLH is led by winter in 2036 (62% winter) and 2040 (79% winter) but reverses back slightly to summer by 2045 (61% summer, 39% winter). In contrast, EUE stays overwhelmingly winter across all study years (92%, 95%,

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and 88% winter in 2036, 2040, and 2045). The bias of more LOLH summer capacity risk in the HEG portfolio is largely due to the increase in loads which adds more summer peak load compared to winter peak load.

Reliability risk also moves between winter months. In CTP, February and December hold 87% of EUE in 2036. By 2045, January alone holds 84.6% and December falls to 4.8%. HEG moves the same direction: February and December hold 89% in 2036, and January reaches 55.3% by 2045. Net load changes help explain these shifts. As loads increase and the installed capacities of wind and solar resources change, January increases its share of each study year's top 5% of net load energy days in both portfolios — from 10.7% to 20.7% in CTP and 11.3% to 16.7% in HEG. December's share stays flat in CTP but rises in HEG, consistent with December retaining EUE in HEG only.

Table 32: CTP 2036 LOLH Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.2%	0.4%	-	-	-	0.9%	0.1%	0.1%	-	-	-	0.8%	2.4%
2	0.2%	0.4%	-	-	-	0.8%	0.0%	0.2%	-	-	-	0.3%	2.0%
3	0.2%	1.0%	-	-	-	0.5%	0.1%	0.2%	-	-	-	0.6%	2.6%
4	0.3%	1.4%	-	-	-	0.4%	-	0.2%	-	-	-	0.9%	3.2%
5	0.4%	2.7%	-	-	-	0.4%	-	0.1%	-	-	-	1.3%	5.0%
6	0.4%	5.1%	-	-	-	0.2%	0.0%	0.1%	-	-	-	2.9%	8.8%
7	1.0%	9.3%	-	-	-	-	0.0%	-	-	-	-	6.8%	17.1%
8	1.3%	10.4%	-	-	-	-	-	-	-	-	-	9.8%	21.6%
9	0.3%	3.0%	-	-	-	-	-	-	-	-	-	2.7%	6.0%
10	-	0.3%	-	-	-	-	-	-	-	-	-	0.5%	0.8%
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
17	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
18	0.0%	-	-	-	-	-	-	0.1%	-	-	-	0.1%	0.2%
19	0.0%	0.0%	-	-	-	1.7%	2.6%	0.9%	-	-	-	0.1%	5.3%
20	0.0%	0.1%	-	-	-	4.0%	4.8%	1.0%	-	-	-	0.6%	10.6%
21	0.1%	0.1%	-	-	-	1.9%	1.0%	0.0%	-	-	-	1.3%	4.5%
22	0.2%	0.2%	-	-	-	0.3%	0.1%	-	-	-	-	1.9%	2.7%
23	0.2%	0.2%	-	-	-	0.2%	0.0%	-	-	-	-	2.6%	3.3%
24	0.2%	0.2%	-	-	-	0.6%	0.0%	0.0%	-	-	-	2.8%	3.9%
Total	**5.2%**	**34.9%**	-	-	-	**11.8%**	**8.8%**	**3.0%**	-	-	-	**36.3%**	**100.0%**

Table 33: CTP 2036 EUE Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.1%	0.3%	-	-	-	1.2%	0.1%	0.1%	-	-	-	0.5%	2.3%
2	0.1%	0.5%	-	-	-	0.6%	0.1%	0.3%	-	-	-	0.5%	2.1%
3	0.1%	0.8%	-	-	-	0.1%	0.0%	0.3%	-	-	-	0.7%	2.1%
4	0.2%	1.8%	-	-	-	0.1%	-	0.1%	-	-	-	1.2%	3.4%
5	0.6%	3.5%	-	-	-	0.1%	-	0.0%	-	-	-	2.3%	6.7%
6	0.9%	8.2%	-	-	-	0.0%	0.0%	0.0%	-	-	-	4.9%	14.1%
7	1.4%	15.8%	-	-	-	-	0.0%	-	-	-	-	11.2%	28.5%
8	1.5%	10.2%	-	-	-	-	-	-	-	-	-	9.9%	21.6%
9	0.1%	0.8%	-	-	-	-	-	-	-	-	-	1.1%	2.0%
10	-	0.0%	-	-	-	-	-	-	-	-	-	0.1%	0.1%
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
17	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
18	0.0%	-	-	-	-	-	-	0.0%	-	-	-	0.1%	0.1%
19	0.1%	0.0%	-	-	-	0.1%	0.1%	0.1%	-	-	-	0.2%	0.5%
20	0.1%	0.1%	-	-	-	0.6%	0.6%	0.1%	-	-	-	0.7%	2.1%
21	0.1%	0.2%	-	-	-	0.3%	0.2%	0.0%	-	-	-	2.1%	2.8%
22	0.3%	0.5%	-	-	-	0.0%	0.0%	-	-	-	-	2.8%	3.6%
23	0.4%	0.6%	-	-	-	0.1%	0.0%	-	-	-	-	3.2%	4.4%
24	0.4%	0.4%	-	-	-	0.8%	0.1%	0.0%	-	-	-	1.8%	3.6%
Total	**6.5%**	**43.9%**	-	-	-	**4.1%**	**1.1%**	**1.0%**	-	-	-	**43.4%**	**100.0%**

Table 34: CTP 2040 LOLH Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.4%	0.9%	-	-	-	0.1%	0.0%	-	-	-	-	2.6%	4.0%
2	0.3%	1.0%	-	-	-	0.2%	0.1%	-	-	-	-	0.8%	2.3%
3	0.3%	1.1%	-	-	-	0.2%	0.0%	-	-	-	-	1.3%	2.9%
4	0.4%	1.3%	-	-	-	0.1%	-	-	-	-	-	1.5%	3.5%
5	0.7%	2.1%	-	-	-	0.2%	-	-	-	-	-	2.8%	5.7%
6	1.0%	3.5%	-	-	-	0.1%	-	-	-	-	-	5.2%	9.8%
7	1.8%	6.6%	-	-	-	-	-	-	-	-	-	10.1%	18.5%
8	2.4%	8.3%	-	-	-	-	-	-	-	-	-	13.3%	24.1%
9	0.4%	2.8%	-	-	-	-	-	-	-	-	-	3.6%	6.8%
10	0.0%	0.3%	-	-	-	-	-	-	-	-	-	0.5%	0.8%
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
12	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	0.0%	-	-	-	-	0.0%
17	-	-	-	-	-	-	-	-	-	-	-	0.1%	0.1%
18	-	-	-	-	-	-	-	-	-	-	-	0.2%	0.2%
19	0.0%	0.0%	-	-	-	0.0%	0.1%	0.1%	-	-	-	0.5%	0.8%
20	0.2%	0.0%	-	-	-	0.1%	0.2%	0.1%	-	-	-	1.1%	1.8%
21	0.2%	0.1%	-	-	-	0.1%	-	-	-	-	-	2.5%	2.9%
22	0.4%	0.2%	-	-	-	-	-	-	-	-	-	3.2%	3.8%
23	0.5%	0.3%	-	-	-	-	-	0.1%	-	-	-	4.6%	5.5%
24	0.6%	0.6%	-	-	-	0.1%	-	0.1%	-	-	-	5.1%	6.5%
Total	**9.7%**	**29.4%**	-	-	-	**1.2%**	**0.4%**	**0.4%**	-	-	-	**59.0%**	**100.0%**

Table 35: CTP 2040 EUE Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.2%	0.5%	-	-	-	0.1%	0.0%	-	-	-	-	0.7%	1.5%
2	0.1%	0.6%	-	-	-	0.1%	0.0%	-	-	-	-	0.9%	1.8%
3	0.2%	0.8%	-	-	-	0.1%	0.0%	-	-	-	-	1.2%	2.3%
4	0.4%	1.2%	-	-	-	0.0%	-	-	-	-	-	1.7%	3.3%
5	0.6%	2.0%	-	-	-	0.0%	-	-	-	-	-	3.3%	6.0%
6	1.1%	4.4%	-	-	-	0.0%	-	-	-	-	-	6.9%	12.5%
7	2.3%	9.2%	-	-	-	-	-	-	-	-	-	15.0%	26.5%
8	2.1%	7.4%	-	-	-	-	-	-	-	-	-	12.7%	22.1%
9	0.1%	0.5%	-	-	-	-	-	-	-	-	-	0.9%	1.5%
10	0.0%	0.0%	-	-	-	-	-	-	-	-	-	0.1%	0.1%
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
12	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	0.0%	-	-	-	-	0.0%
17	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
18	-	-	-	-	-	-	-	-	-	-	-	0.2%	0.2%
19	0.0%	0.0%	-	-	-	0.0%	0.0%	0.0%	-	-	-	0.7%	0.7%
20	0.1%	0.1%	-	-	-	0.0%	0.0%	0.0%	-	-	-	1.6%	1.8%
21	0.3%	0.1%	-	-	-	0.0%	-	-	-	-	-	3.3%	3.8%
22	0.6%	0.3%	-	-	-	-	-	-	-	-	-	4.3%	5.2%
23	0.7%	0.5%	-	-	-	-	-	0.1%	-	-	-	5.2%	6.4%
24	0.6%	0.6%	-	-	-	0.0%	-	0.0%	-	-	-	3.0%	4.2%
Total	**9.5%**	**28.3%**	-	-	-	**0.3%**	**0.1%**	**0.1%**	-	-	-	**61.7%**	**100.0%**

Table 36: CTP 2045 LOLH Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	1.4%	0.5%	-	-	-	0.0%	0.0%	-	-	-	-	0.2%	2.1%
2	1.8%	0.4%	-	-	-	-	-	-	-	-	-	0.1%	2.3%
3	2.3%	0.4%	-	-	-	-	-	-	-	-	-	0.1%	2.9%
4	3.3%	0.5%	-	-	-	-	-	-	-	-	-	0.3%	4.1%
5	5.1%	0.9%	-	-	-	-	-	-	-	-	-	0.4%	6.3%
6	8.2%	1.4%	-	-	-	-	-	-	-	-	-	0.6%	10.3%
7	15.1%	2.7%	-	-	-	-	-	-	-	-	-	1.3%	19.1%
8	20.5%	3.6%	-	-	-	-	-	-	-	-	-	1.7%	25.9%
9	9.6%	1.7%	-	-	-	-	-	-	-	-	-	0.2%	11.5%
10	1.3%	0.2%	-	-	-	-	-	-	-	-	-	0.1%	1.5%
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	-	-	-	-	-	-	-	-
18	0.1%	-	-	-	-	-	-	-	-	-	-	-	0.1%
19	0.2%	-	-	-	-	0.9%	0.7%	0.2%	-	-	-	-	2.0%
20	0.3%	-	-	-	-	2.1%	2.4%	0.4%	-	-	-	0.1%	5.3%
21	0.5%	-	-	-	-	0.3%	0.3%	0.0%	-	-	-	0.2%	1.3%
22	0.9%	0.1%	-	-	-	0.0%	-	-	-	-	-	0.3%	1.3%
23	1.3%	0.2%	-	-	-	0.0%	-	-	-	-	-	0.3%	1.9%
24	1.4%	0.3%	-	-	-	0.0%	-	-	-	-	-	0.3%	2.1%
Total	**73.5%**	**12.9%**	-	-	-	**3.4%**	**3.4%**	**0.6%**	-	-	-	**6.1%**	**100.0%**

Table 37: CTP 2045 EUE Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.9%	0.2%	-	-	-	0.0%	0.0%	-	-	-	-	0.1%	**1.1%**
2	1.3%	0.1%	-	-	-	-	-	-	-	-	-	0.1%	**1.5%**
3	2.0%	0.2%	-	-	-	-	-	-	-	-	-	0.1%	**2.4%**
4	3.6%	0.3%	-	-	-	-	-	-	-	-	-	0.1%	**4.0%**
5	6.5%	0.6%	-	-	-	-	-	-	-	-	-	0.2%	**7.4%**
6	12.8%	1.5%	-	-	-	-	-	-	-	-	-	0.6%	**14.9%**
7	24.5%	3.2%	-	-	-	-	-	-	-	-	-	1.4%	**29.1%**
8	25.5%	3.2%	-	-	-	-	-	-	-	-	-	1.1%	**29.8%**
9	3.2%	0.2%	-	-	-	-	-	-	-	-	-	0.1%	**3.5%**
10	0.1%	0.0%	-	-	-	-	-	-	-	-	-	0.0%	**0.1%**
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	**0.0%**
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	-	-	-	-	-	-	-	-
18	0.0%	-	-	-	-	-	-	-	-	-	-	-	**0.0%**
19	0.1%	-	-	-	-	0.0%	0.0%	0.0%	-	-	-	-	**0.2%**
20	0.3%	-	-	-	-	0.1%	0.2%	0.0%	-	-	-	0.0%	**0.7%**
21	0.5%	-	-	-	-	0.0%	0.0%	0.0%	-	-	-	0.1%	**0.7%**
22	0.9%	0.1%	-	-	-	0.0%	-	-	-	-	-	0.3%	**1.3%**
23	1.2%	0.2%	-	-	-	0.0%	-	-	-	-	-	0.3%	**1.8%**
24	1.1%	0.2%	-	-	-	0.0%	-	-	-	-	-	0.2%	**1.6%**
Total	**84.6%**	**10.1%**	-	-	-	**0.2%**	**0.2%**	**0.0%**	-	-	-	**4.8%**	**100.0%**

Table 38: HEG 2036 LOLH Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.1%	0.5%	-	-	-	0.8%	0.1%	-	-	-	-	0.6%	**2.0%**
2	0.1%	0.4%	-	-	-	0.9%	0.0%	-	-	-	-	0.5%	**1.8%**
3	0.1%	0.5%	-	-	-	0.8%	0.1%	-	-	-	-	0.7%	**2.1%**
4	0.1%	0.9%	-	-	-	0.8%	0.1%	-	-	-	-	0.9%	**2.8%**
5	0.1%	2.3%	-	-	-	0.7%	0.0%	-	-	-	-	1.4%	**4.6%**
6	0.1%	4.2%	-	-	-	0.2%	0.0%	-	-	-	-	2.1%	**6.6%**
7	0.3%	7.6%	-	-	-	-	-	-	-	-	-	4.7%	**12.6%**
8	0.5%	8.8%	-	-	-	-	-	-	-	-	-	6.0%	**15.3%**
9	0.2%	2.0%	-	-	-	-	-	-	-	-	-	1.7%	**3.9%**
10	0.0%	0.0%	-	-	-	-	-	-	-	-	-	0.1%	**0.2%**
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	**0.0%**
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	-	-	0.0%	-	-	-	0.0%	**0.0%**
18	0.0%	0.1%	-	-	-	-	-	0.0%	-	-	-	0.3%	**0.5%**
19	0.0%	0.1%	-	-	-	3.1%	4.2%	1.5%	-	-	-	0.5%	**9.5%**
20	0.1%	0.1%	-	-	-	7.9%	7.8%	2.3%	-	-	-	1.3%	**19.5%**
21	0.1%	0.1%	-	-	-	3.8%	1.4%	0.5%	-	-	-	1.7%	**7.6%**
22	0.1%	0.2%	-	-	-	0.1%	0.2%	0.1%	-	-	-	2.2%	**2.9%**
23	0.2%	0.4%	-	-	-	0.1%	0.0%	-	-	-	-	2.9%	**3.6%**
24	0.2%	0.6%	-	-	-	0.5%	0.1%	-	-	-	-	3.1%	**4.5%**
Total	**2.2%**	**28.8%**	-	-	-	**19.7%**	**14.0%**	**4.3%**	-	-	-	**30.9%**	**100.0%**

Table 39: HEG 2036 EUE Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.1%	0.2%	-	-	-	1.4%	0.1%	-	-	-	-	0.7%	2.5%
2	0.0%	0.3%	-	-	-	0.9%	0.0%	-	-	-	-	0.8%	2.0%
3	0.0%	0.4%	-	-	-	0.3%	0.1%	-	-	-	-	1.1%	1.9%
4	0.0%	1.1%	-	-	-	0.2%	0.1%	-	-	-	-	1.6%	3.0%
5	0.1%	3.0%	-	-	-	0.3%	0.0%	-	-	-	-	2.9%	6.3%
6	0.1%	7.1%	-	-	-	0.0%	0.0%	-	-	-	-	4.9%	12.2%
7	0.5%	14.5%	-	-	-	-	-	-	-	-	-	9.2%	24.2%
8	0.7%	10.1%	-	-	-	-	-	-	-	-	-	8.6%	19.5%
9	0.1%	0.4%	-	-	-	-	-	-	-	-	-	0.8%	1.3%
10	0.0%	0.0%	-	-	-	-	-	-	-	-	-	0.1%	0.1%
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	0.0%
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	-	-	0.0%	-	-	-	0.0%	0.0%
18	0.0%	0.0%	-	-	-	-	0.0%	0.0%	-	-	-	0.1%	0.1%
19	0.1%	0.1%	-	-	-	0.1%	0.3%	0.2%	-	-	-	1.2%	1.9%
20	0.1%	0.3%	-	-	-	1.1%	1.1%	0.4%	-	-	-	2.5%	5.4%
21	0.2%	0.5%	-	-	-	0.3%	0.2%	0.1%	-	-	-	4.2%	5.4%
22	0.3%	0.7%	-	-	-	0.0%	0.0%	0.0%	-	-	-	3.9%	4.9%
23	0.3%	0.8%	-	-	-	0.2%	0.0%	-	-	-	-	3.9%	5.3%
24	0.3%	0.6%	-	-	-	0.9%	0.1%	-	-	-	-	1.9%	3.9%
Total	**3.0%**	**40.2%**	**-**	**-**	**-**	**5.7%**	**2.0%**	**0.6%**	**-**	**-**	**-**	**48.6%**	**100.0%**

Table 40: HEG 2040 LOLH Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.1%	1.2%	-	-	-	0.8%	0.2%	-	-	-	-	0.5%	2.8%
2	0.0%	0.7%	-	-	-	0.6%	0.0%	-	-	-	-	0.4%	1.8%
3	0.0%	1.0%	-	-	-	0.5%	0.0%	0.0%	-	-	-	0.7%	2.2%
4	0.1%	1.4%	-	-	-	0.6%	0.0%	0.0%	-	-	-	0.7%	2.9%
5	0.1%	2.5%	-	-	-	0.4%	0.0%	0.0%	-	-	-	1.0%	4.1%
6	0.2%	4.7%	-	-	-	0.1%	-	-	-	-	-	2.1%	7.1%
7	0.6%	9.2%	-	-	-	-	-	-	-	-	-	5.2%	15.0%
8	0.8%	10.6%	-	-	-	-	-	-	-	-	-	6.8%	18.1%
9	0.2%	2.2%	-	-	-	-	-	-	-	-	-	2.1%	4.5%
10	-	-	-	-	-	-	-	-	-	-	-	0.3%	0.3%
11	-	-	-	-	-	-	-	-	-	-	-	0.1%	0.1%
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	-	-	-	-	-	-	0.1%	0.1%
18	-	0.1%	-	-	-	-	-	-	0.1%	-	-	0.2%	0.4%
19	-	0.1%	-	-	-	1.7%	2.1%	0.6%	-	-	-	0.7%	5.2%
20	0.0%	0.3%	-	-	-	3.8%	4.5%	1.1%	-	-	-	1.8%	11.6%
21	0.1%	0.2%	-	-	-	1.8%	0.6%	0.2%	-	-	-	3.2%	6.1%
22	0.1%	0.5%	-	-	-	0.1%	-	0.0%	-	-	-	3.9%	4.7%
23	0.1%	1.0%	-	-	-	0.3%	-	-	-	-	-	4.9%	6.3%
24	0.2%	1.1%	-	-	-	0.6%	0.1%	-	-	-	-	4.7%	6.8%
Total	**2.6%**	**36.8%**	**-**	**-**	**-**	**11.6%**	**7.5%**	**2.0%**	**0.1%**	**-**	**-**	**39.4%**	**100.0%**

Table 41: HEG 2040 EUE Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.0%	0.5%	-	-	-	0.8%	0.1%	-	-	-	-	0.4%	**1.8%**
2	0.0%	0.5%	-	-	-	0.4%	0.1%	-	-	-	-	0.5%	**1.3%**
3	0.0%	0.3%	-	-	-	0.1%	0.0%	0.0%	-	-	-	0.6%	**1.2%**
4	0.1%	0.9%	-	-	-	0.1%	0.0%	0.0%	-	-	-	1.1%	**2.1%**
5	0.1%	3.4%	-	-	-	0.1%	0.0%	0.0%	-	-	-	1.6%	**5.2%**
6	0.2%	7.2%	-	-	-	0.0%	-	-	-	-	-	3.4%	**10.8%**
7	0.7%	15.1%	-	-	-	-	-	-	-	-	-	8.9%	**24.7%**
8	0.9%	10.2%	-	-	-	-	-	-	-	-	-	8.4%	**19.5%**
9	0.0%	0.2%	-	-	-	-	-	-	-	-	-	0.6%	**0.8%**
10	-	-	-	-	-	-	-	-	-	-	-	0.1%	**0.1%**
11	-	-	-	-	-	-	-	-	-	-	-	0.0%	**0.0%**
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	-	-	-	-	-	-	0.1%	**0.1%**
18	-	0.0%	-	-	-	-	-	-	0.0%	-	-	0.3%	**0.3%**
19	-	0.1%	-	-	-	0.1%	0.1%	0.0%	-	-	-	1.1%	**1.4%**
20	0.0%	0.2%	-	-	-	0.6%	0.5%	0.2%	-	-	-	3.2%	**4.6%**
21	0.1%	0.3%	-	-	-	0.2%	0.0%	0.0%	-	-	-	6.2%	**6.8%**
22	0.1%	0.8%	-	-	-	0.0%	-	0.0%	-	-	-	6.3%	**7.2%**
23	0.1%	1.7%	-	-	-	0.3%	-	-	-	-	-	5.5%	**7.6%**
24	0.2%	1.4%	-	-	-	0.9%	0.1%	-	-	-	-	1.7%	**4.3%**
Total	**2.6%**	**42.7%**	-	-	-	**3.7%**	**0.9%**	**0.3%**	**0.0%**	-	-	**49.8%**	**100.0%**

Table 42: HEG 2045 LOLH Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.2%	0.2%	-	-	-	0.2%	0.0%	-	-	-	-	0.4%	**1.0%**
2	0.3%	0.1%	-	-	-	0.0%	-	-	-	-	-	0.2%	**0.6%**
3	0.5%	0.1%	-	-	-	-	-	-	-	-	-	0.3%	**0.9%**
4	0.7%	0.1%	-	-	-	-	-	-	-	-	-	0.4%	**1.2%**
5	1.3%	0.4%	-	-	-	-	-	-	-	-	-	0.3%	**2.1%**
6	2.5%	1.0%	-	-	-	-	-	-	-	-	-	0.5%	**4.0%**
7	4.7%	2.2%	-	-	-	-	-	-	-	-	-	1.1%	**8.1%**
8	6.6%	2.8%	-	-	-	-	-	-	-	-	-	1.4%	**10.8%**
9	3.3%	0.8%	-	-	-	-	-	-	-	-	-	0.3%	**4.3%**
10	0.5%	-	-	-	-	-	-	-	-	-	-	0.2%	**0.7%**
11	0.1%	-	-	-	-	-	-	-	-	-	-	-	**0.1%**
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	-	-	-	-	-	-	0.0%	**0.0%**
18	-	0.1%	-	-	-	-	0.0%	0.1%	-	-	-	0.1%	**0.3%**
19	-	0.1%	-	-	-	9.2%	8.0%	2.6%	-	-	-	0.1%	**20.0%**
20	0.1%	0.1%	-	-	-	15.9%	15.4%	3.0%	-	-	-	0.3%	**34.7%**
21	0.2%	0.0%	-	-	-	3.5%	2.0%	0.2%	-	-	-	0.6%	**6.6%**
22	0.3%	0.2%	-	-	-	0.0%	0.0%	-	-	-	-	0.8%	**1.3%**
23	0.3%	0.2%	-	-	-	0.0%	0.0%	-	-	-	-	1.0%	**1.5%**
24	0.3%	0.3%	-	-	-	0.2%	0.0%	-	-	-	-	1.0%	**1.8%**
Total	**21.9%**	**8.6%**	-	-	-	**29.1%**	**25.6%**	**6.0%**	-	-	-	**8.9%**	**100.0%**

Table 43: HEG 2045 EUE Heat Map

Hour of Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.2%	0.0%	-	-	-	0.1%	0.0%	-	-	-	-	0.2%	**0.6%**
2	0.3%	0.1%	-	-	-	0.0%	-	-	-	-	-	0.2%	**0.5%**
3	0.7%	0.0%	-	-	-	-	-	-	-	-	-	0.3%	**1.0%**
4	1.6%	0.0%	-	-	-	-	-	-	-	-	-	0.3%	**1.9%**
5	3.1%	0.2%	-	-	-	-	-	-	-	-	-	0.4%	**3.8%**
6	7.9%	2.0%	-	-	-	-	-	-	-	-	-	0.8%	**10.7%**
7	18.2%	5.9%	-	-	-	-	-	-	-	-	-	2.2%	**26.3%**
8	18.9%	5.3%	-	-	-	-	-	-	-	-	-	2.2%	**26.3%**
9	2.5%	0.1%	-	-	-	-	-	-	-	-	-	0.5%	**3.1%**
10	0.1%	-	-	-	-	-	-	-	-	-	-	0.1%	**0.2%**
11	0.0%	-	-	-	-	-	-	-	-	-	-	-	**0.0%**
12	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-	-	-	-
17	-	-	-	-	-	-	-	-	-	-	-	0.0%	**0.0%**
18	-	0.0%	-	-	-	-	0.0%	0.0%	-	-	-	0.1%	**0.1%**
19	-	0.0%	-	-	-	1.1%	0.6%	0.4%	-	-	-	0.3%	**2.4%**
20	0.1%	0.0%	-	-	-	4.7%	2.5%	0.9%	-	-	-	0.8%	**9.0%**
21	0.2%	0.0%	-	-	-	0.8%	0.3%	0.0%	-	-	-	2.2%	**3.5%**
22	0.6%	0.5%	-	-	-	0.0%	0.1%	-	-	-	-	2.9%	**4.1%**
23	0.6%	0.9%	-	-	-	0.0%	0.1%	-	-	-	-	2.4%	**4.0%**
24	0.3%	0.5%	-	-	-	0.4%	0.1%	-	-	-	-	1.2%	**2.4%**
Total	**55.3%**	**15.6%**	-	-	-	**7.0%**	**3.6%**	**1.3%**	-	-	-	**17.2%**	**100.0%**

In 2036 the stakeholder-proposed scenario portfolio exceeds the reserve margin target, at 25.0%. In 2040, the LOLE of 0.30 is higher than the estimated reserve margin of 17.5% would suggest, reflecting an overstatement of the DR ELCC as well as storage ELCC because the portfolio has less solar energy to charge the storage than the CTP 2040 portfolio. In 2045, the scenario meets the 0.1 LOLE target on an estimated reserve margin of 11.9%, well below the 14.5% PRM, reflecting the same modest 2045 understatement of firm capacity described for the CTP and HEG portfolios above. Results are summarized in **Table 44**.

Table 44: Stakeholder Proposed Scenario Reliability Results

Study Year	LOLE (days/year)	EUE (MWh)	Estimated Reserve Margin (%)
2036	0.01	5	25.0%
2040	0.30	329	17.5%
2045	0.10	65	11.9%

Resiliency Analysis

Portfolio Resiliency

The CTP and HEG portfolios calibrated to 0.1 LOLE were simulated for the selected summer and winter extreme weather years across the 2036, 2040, and 2045 study years. An additional island sensitivity was

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also conducted to understand the system's resiliency under extreme conditions with no external assistance. The resulting weekly EUE is shown below for each portfolio and study year. Weekly dispatch charts for all portfolio, study year, season, and interconnected/islanded combinations are provided in the **Appendix**; selected charts are reproduced in this section to illustrate the discussion.

Table 45: Summer Resiliency Results

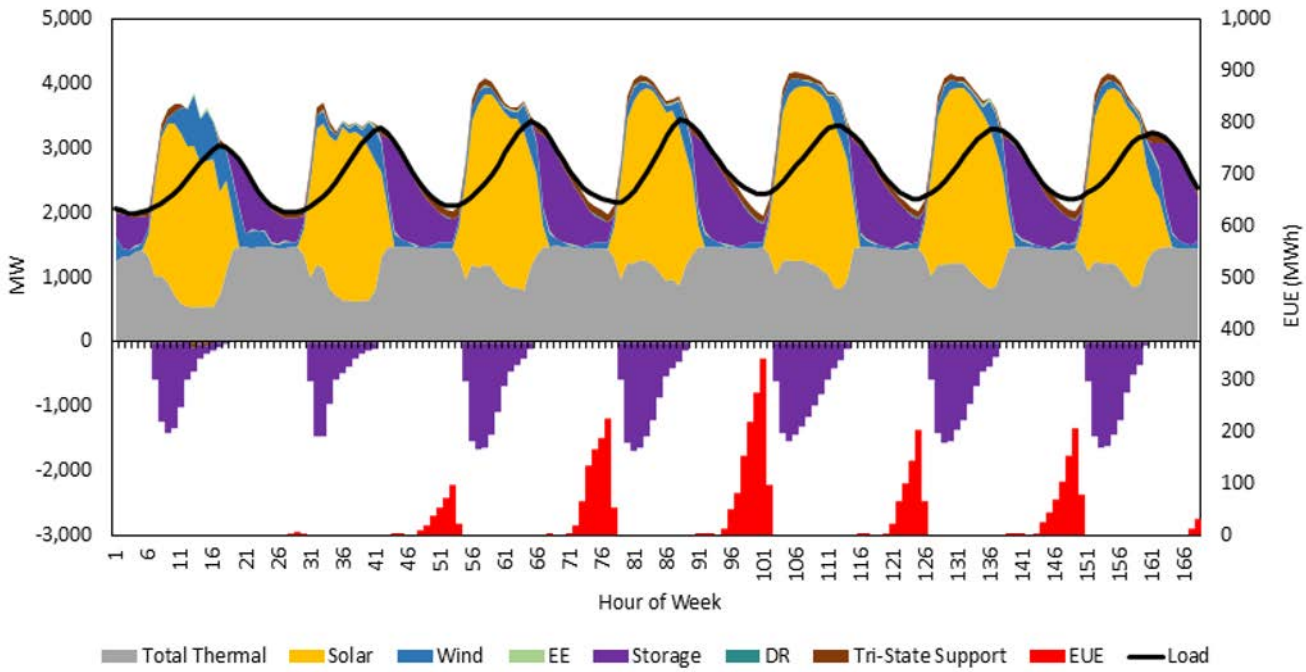
Portfolio	Year	Interconnected Weekly EUE (MWh)	Islanded Weekly EUE (MWh)
CTP	2036	6	3,758
CTP	2040	1	4,383
CTP	2045	4	2,509
HEG	2036	33	3,892
HEG	2040	13	3,596
HEG	2045	7	1,152

Table 46: Winter Resiliency Results

Portfolio	Year	Interconnected Weekly EUE (MWh)	Islanded Weekly EUE (MWh)
CTP	2036	259	9,259
CTP	2040	614	10,237
CTP	2045	76	3,823
HEG	2036	252	17,187
HEG	2040	528	6,061
HEG	2045	54	2,470

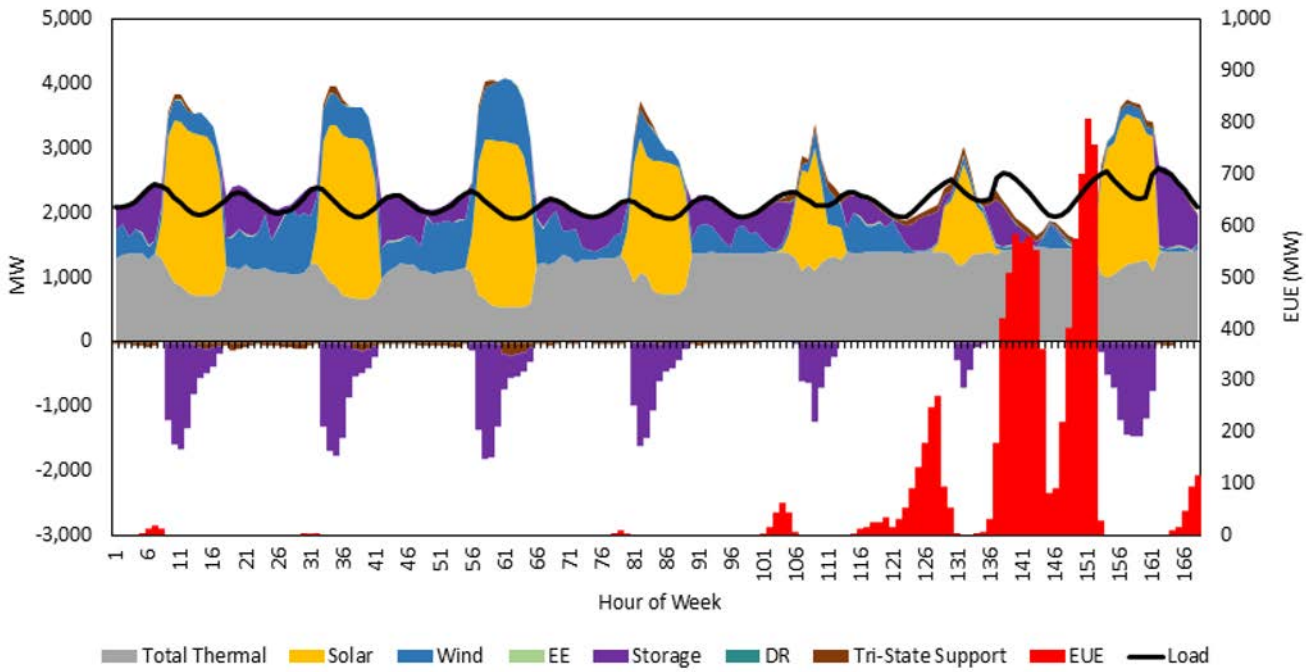
Generally, in summer, unserved energy in these islanded cases occurs in the early morning hours rather than at the evening net-load peak that drives summer risk in the base case. Storage discharges through the evening peak, is drawn down overnight, and reaches its lowest point shortly before sunrise, leaving a shallow shortfall in the pre-dawn hours that ends as solar generation returns for the day. The 2036, islanded, summer, CTP weekly dispatch is shown in **Figure 15** below and illustrates the frequent, lower EUE events that characterize summer LOLE.

Figure 15: CTP 2036 Summer Islanded Weekly Dispatch



In winter, loads are dual-peaking and during the intervals between successive peaks there is not enough energy to charge the storage resources. State of charge declines progressively across the week rather than recovering each night. This results in generally larger but less frequent EUE events concentrated at the end of the week, once storage is fully depleted. Winter therefore produces fewer hours of unserved energy than summer but far more unserved energy in total. This aligns with the heat maps and takeaways discussed in earlier sections, which likewise show greater EUE in winter than in summer. The 2036, islanded, winter, CTP weekly dispatch is shown in **Figure 16** and illustrates the higher magnitude EUE events that characterize winter LOLE.

Figure 16: CTP 2036 Winter Islanded Weekly Dispatch



For further interpreting the weekly EUE results, a useful metric is firm capacity as a percentage of peak load forecast. This is calculated as the combined nameplate capacity of combined cycle, combustion turbine, steam turbine, linear generator, nuclear, and geothermal resources, divided by the peak load forecast for the given portfolio and study year. Firm, dispatchable capacity is available albeit absent forced or planned outages irrespective of weather, time of day, or stored energy, and it is therefore what remains to serve load once storage has been depleted and solar and wind have receded. **Table 47** shows the calculated firm capacity ratios. Because the 0.1 LOLE calibration adjusts 4HR storage only, these ratios apply equally to the calibrated portfolios simulated in the resiliency analysis.

Table 47: Firm Capacity Ratio for Expansion Portfolios

Portfolio	Year	Firm / load	Summer Islanded Weekly EUE (MWh)	Winter Islanded Weekly EUE (MWh)
CTP	2036	42.5%	3,758	9,259
CTP	2040	39.8%	4,383	10,237
CTP	2045	47.4%	2,509	3,823
HEG	2036	37.6%	3,892	17,187
HEG	2040	37.8%	3,596	6,061
HEG	2045	45.3%	1,152	2,470

Both portfolios improve considerably by 2045, when combined cycle, steam turbine, and geothermal capacity retire and are replaced by 1,022 MW of small modular nuclear capacity. That addition is large

enough to raise firm capacity to its highest share of the three study years in both portfolios, despite 2045 also carrying the highest load.

For the CTP portfolio as seen in Table 46, weekly EUE moves inversely with the firm capacity share in all three islanded cases. The 2040 case has the lowest firm capacity share of the three study years, because firm capacity falls in absolute terms between 2036 and 2040 as combustion turbine capacity retires faster than linear generation is added, while the load forecast continues to rise. It also produces the highest unserved energy in the winter week and summer islanded case. The 2045 case is the reverse, with the highest firm capacity share and the lowest unserved energy in summer and winter.

The HEG portfolio follows the same pattern where the lowest firm capacity share shows the higher EUE. The study year 2036 has the lowest firm capacity share and we see the EUE increase rapidly. At this point, we see the additional firm capacity in 2040 versus 2036 makes a substantial difference during the winter resiliency week because the storage fleet is able to be more fully charged entering into the week. The HEG 2036 case is a marked outlier. HEG 2036 and HEG 2040 provide almost exactly the same share of peak load from firm capacity, yet 2036 produces roughly three times the islanded winter unserved energy of 2040. The two cases do not, however, enter the week with identical storage: the 0.1 LOLE calibration removed 230 MW of 4HR storage from HEG 2036 and added 20 MW to HEG 2040, leaving 2036 with roughly 250 MW less short-duration storage. The 2036 and 2040 winter, islanded, HEG dispatches are shown in **Figure 17** and **Figure 18**.

Figure 17: HEG 2036 Winter Islanded Weekly Dispatch

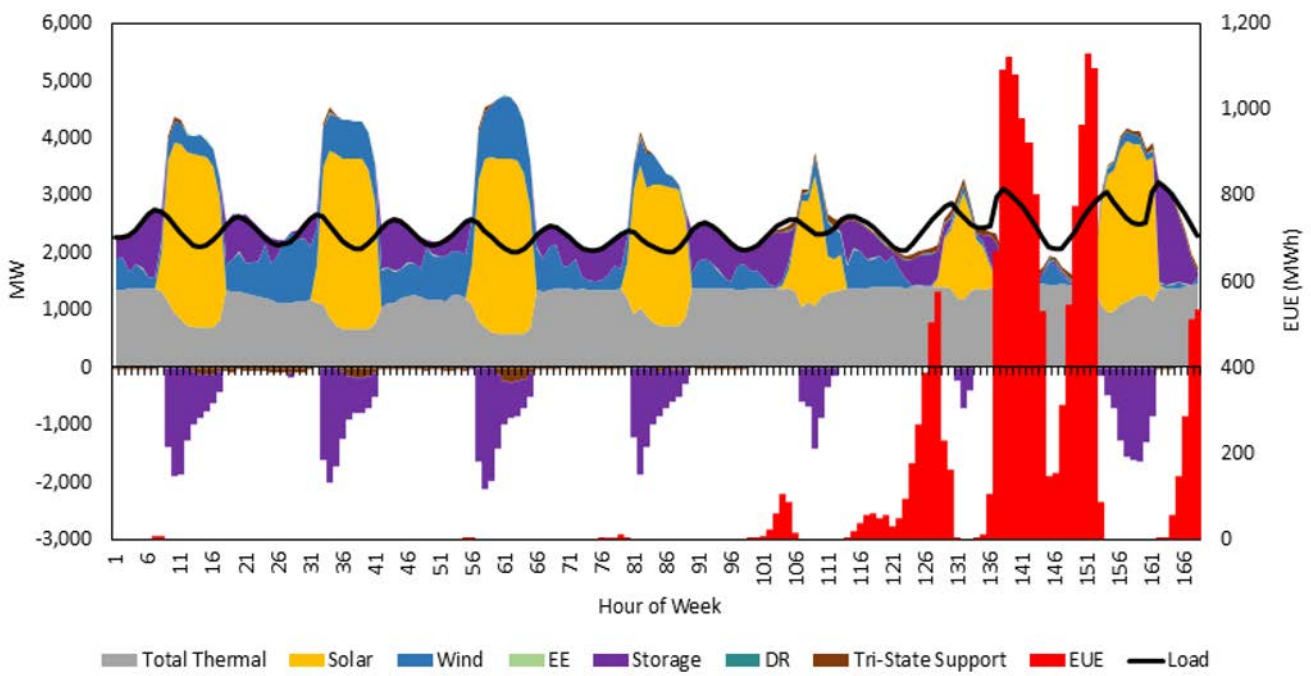
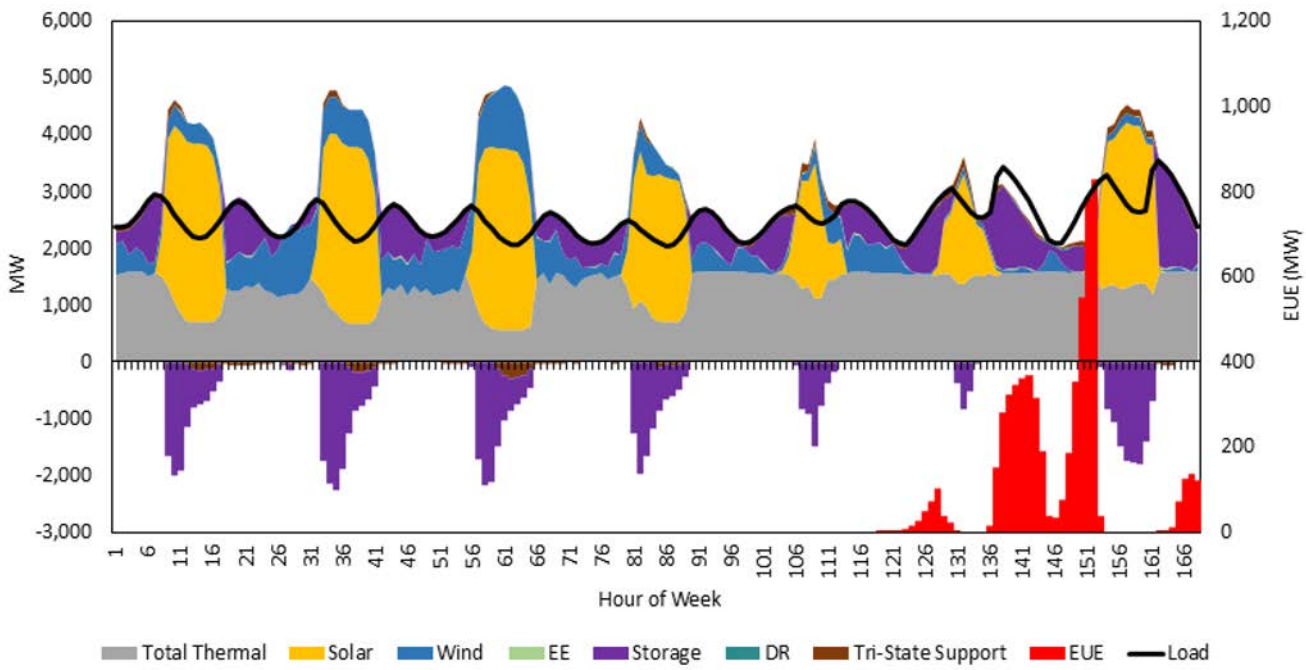


Figure 18: HEG 2040 Winter Islanded Weekly Dispatch



The explanation for the high 2036 unserved energy lies largely in how additional firm capacity performs across a sustained multi-day extreme weather period. The HEG 2040 portfolio carries over 100 MW more firm capacity than the HEG 2036 portfolio, and across the resiliency week that capacity delivers appreciably more energy despite serving higher load. It also begins the week with more short-duration storage. The difference is apparent from the beginning of the week. In the 2036 case small shortfalls appear on the first day and recur on most days that follow, indicating an energy shortfall from the outset. HEG 2040 records no unserved energy at all through the first four days of the extreme winter week.

Resiliency Comparison of Different Technologies

The second part of the resiliency analysis compares how different resource technologies perform under extreme conditions when each is sized to provide the same reliability. Starting from the CTP 2036 portfolio calibrated to 0.1 LOLE, 100 MW of load was added, and each of four technologies (an LM6000 combustion turbine, 4HR storage, DR, and solar paired with storage at a 2:1 solar-to-storage ratio) was then added independently in the amount required to return the system to 0.1 LOLE. Because every scenario is calibrated to the same annual LOLE, the EUE differences highlight how each technology helps the portfolio when the system experiences extreme weather. Each scenario was evaluated first on EUE across a full simulation of all weather years, and then on EUE and system dispatch during the same extreme summer and winter weeks used in the portfolio resiliency analysis. The results of this analysis are shown in **Table 48**.

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Table 48: Resiliency Comparison of Different Technologies

Marginal Resource	Marginal MW	Full Study Annual EUE (MWh)	Summer Extreme Week EUE (MWh)	Winter Extreme Week EUE (MWh)
LM6000	105	67	26	145
4HR	345	107	13	603
Demand Response	580	73	0	474
Solar and Storage	580/290	100	<1	463

Across the full simulation of all weather years, the LM6000 produces the lowest annual EUE at 67 MWh, followed by DR at 73 MWh, solar and storage at 100 MWh, and 4HR storage at 107 MWh. The ordering reflects how much each resource is limited by energy rather than capacity. The LM6000 can serve a deficit of any duration once committed unless it is on forced outage or planned maintenance, so the capacity added closely matches the capacity the system was short. DR is constrained by the number and length of events it can be called for, but those events are long enough to cover most hours in which the system is short. The solar and storage case and the 4HR resource depend on stored energy and on the opportunity to recharge, so a portion of their capacity is unavailable in the longest events and considerably more of it is required to reach the same annual reliability.

The extreme summer week reverses part of that ordering. With 100 MW of additional load, the 4HR and the solar and storage scenarios record 13 MWh and less than 1 MWh of unserved energy, and DR records none, against 26 MWh for the LM6000. Summer shortfalls are concentrated in a few late afternoon and evening hours, which is within the discharge duration of storage. Because the energy limited resources require far more installed capacity to reach the same annual reliability, 345 MW of 4HR, 580 MW of solar with 290 MW of storage, and 580 MW of DR against 105 MW of the LM6000, that additional capacity is available in the hours when the system is short and the events are brief enough that stored energy is not exhausted. DR clears the extreme summer week with no unserved energy for the same reason: the large amount of DR added (580 MW) overcomes the summer events. The extreme winter week results are aligned with the annual results. Winter risk is driven by cold that persists across several days and a morning and evening peak rather than by a single evening peak, leaving the energy limited resources (even with much higher capacity levels) unable to sustain output through the event or to fully recharge between days. The LM6000 holds winter extreme week EUE to 145 MWh, while DR reaches 474 MWh, solar and storage 463 MWh, and 4HR storage 603 MWh despite their much larger installed capacity. DR clears the summer week but is constrained in winter by the number and duration of events it can be called, so it cannot cover a multi-day cold event and performs in line with the energy limited resources rather than with the LM6000. Sustained winter conditions therefore favor firm capacity.

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Appendix

Table 49: PNM Solar Profile Locations

Profile Name	Latitude	Longitude
Alamogordo	32.8863	−105.9708
Alamosa	35.0780	−106.7083
Albuquerque	35.0840	−106.6500
Alta Luna	32.5708	−107.4885
Arroyo Solar	35.9715	−107.5602
Bluewater	35.2578	−107.9396
Britton	35.0129	−106.0954
Cimarron	36.4681	−104.6396
Cuba	36.0174	−106.9460
Encino	35.3266	−106.8562
Escalante	35.4161	−108.0873
Estancia	34.7826	−106.0558
Jicarilla Solar I	36.3284	−107.2779
NMRD	35.0747	−106.8644
Quail Ranch Solar	35.2164	−106.8358
Route 66	35.1029	−107.6158
San Juan Solar	36.8021	−108.4425
Sky Ranch	34.7826	−106.7798
Spanish Peaks	37.3770	−104.4590
Springer	36.3981	−104.5942
Storrie	35.6569	−105.1839
TAG Solar PV	35.3297	−106.8549
Alamogordo	32.8863	−105.9708

Table 50: Neighbor Solar Profile Locations

Profile Name	Latitude	Longitude
Arizona 1	35.85	−111.90
Arizona 2	36.29	−109.70
Arizona 3	34.65	−109.42
Arizona 4	35.29	−114.22
Arizona 5	32.93	−109.70
Arizona 6	31.45	−109.70
EPE 1	31.61	−105.02
EPE 2	32.13	−105.70
PSCo 1	40.53	−105.74
PSCo 2	38.29	−103.30

Figure 19: CTP 2036 Summer Interconnected Weekly Dispatch

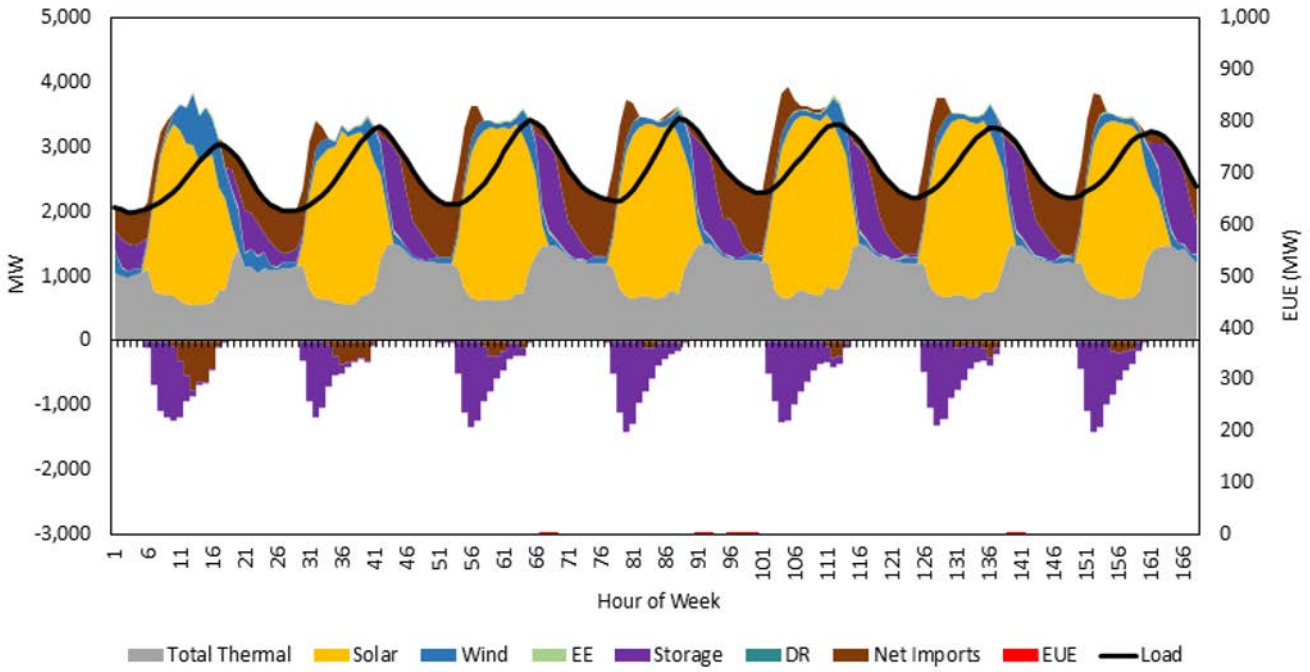


Figure 20: CTP 2036 Summer Islanded Weekly Dispatch

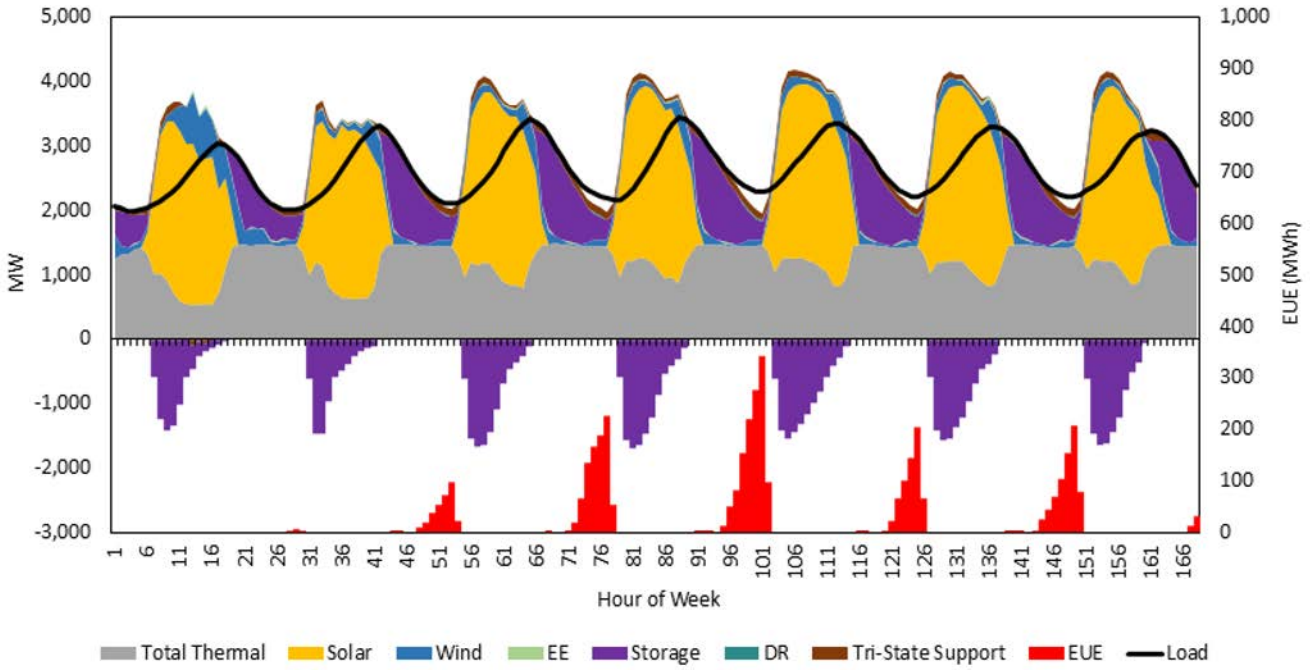


Figure 21: CTP 2040 Summer Interconnected Weekly Dispatch

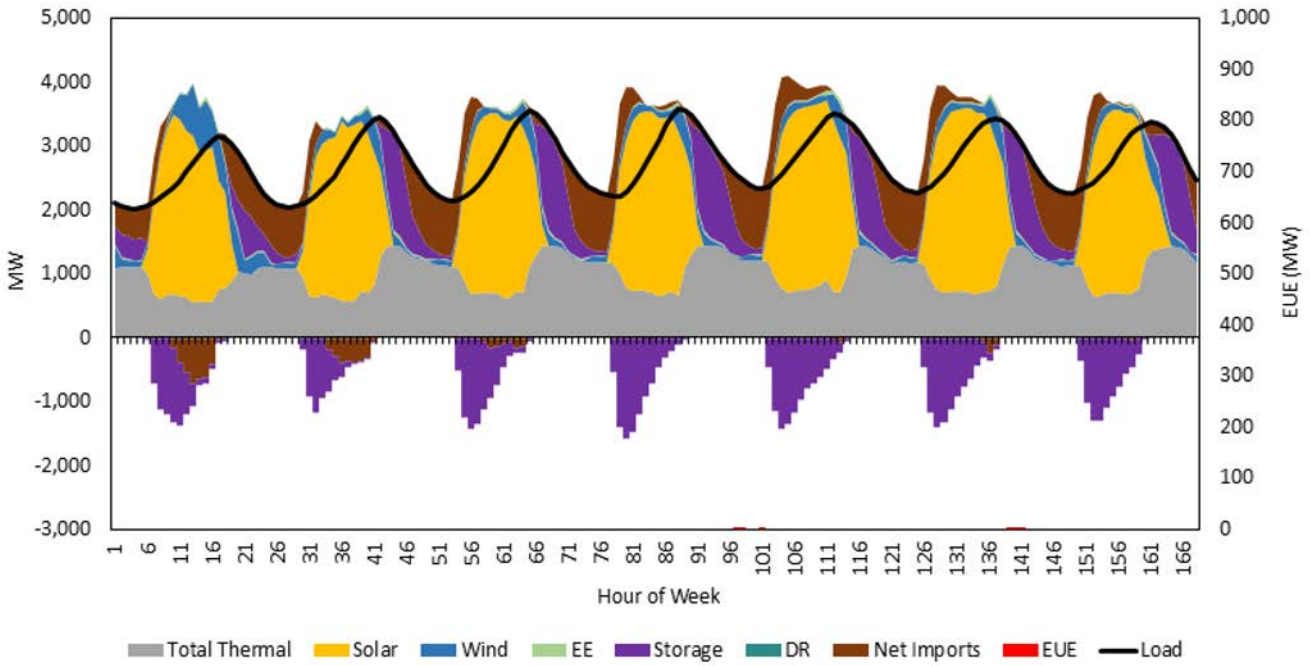


Figure 22: CTP 2040 Summer Islanded Weekly Dispatch

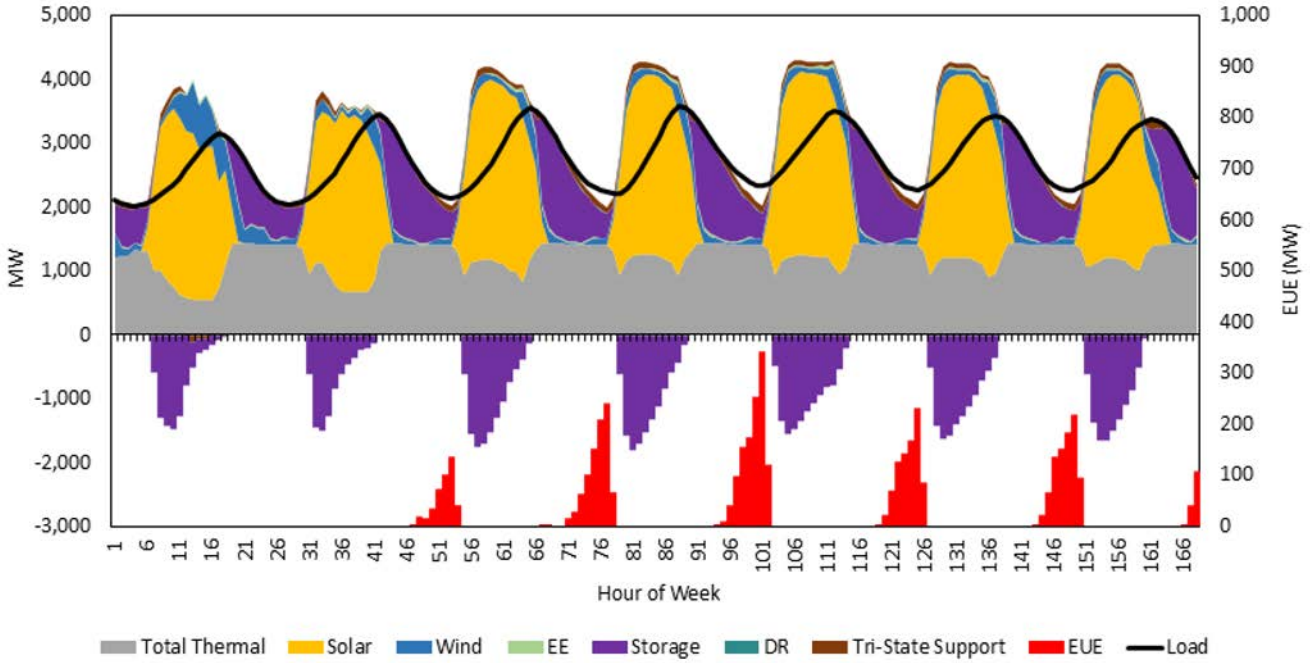


Figure 23: CTP 2045 Summer Interconnected Weekly Dispatch

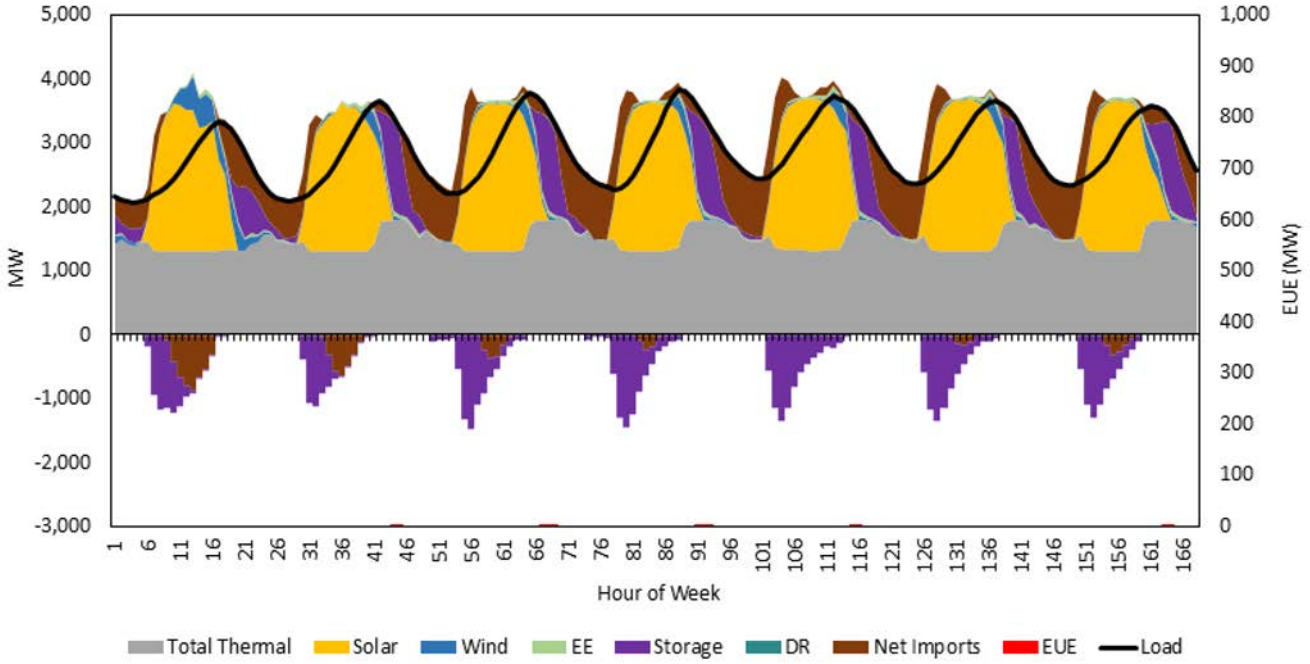


Figure 24: CTP 2045 Summer Islanded Weekly Dispatch

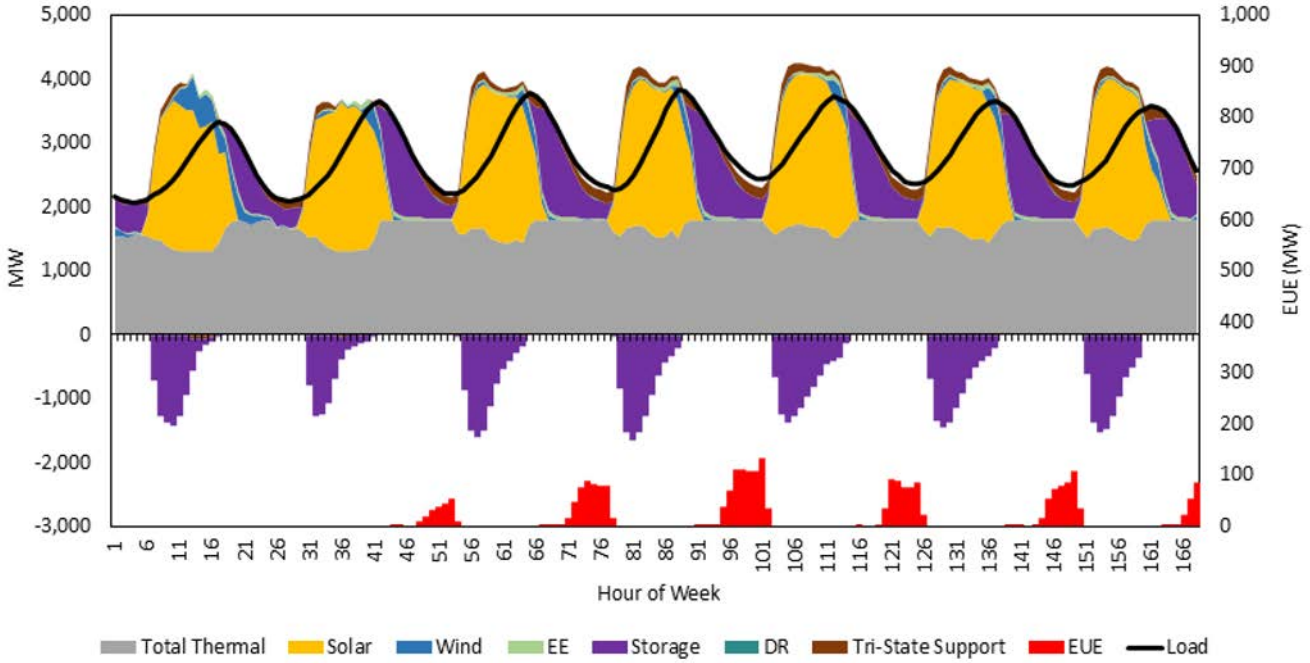


Figure 25: CTP 2036 Winter Interconnected Weekly Dispatch

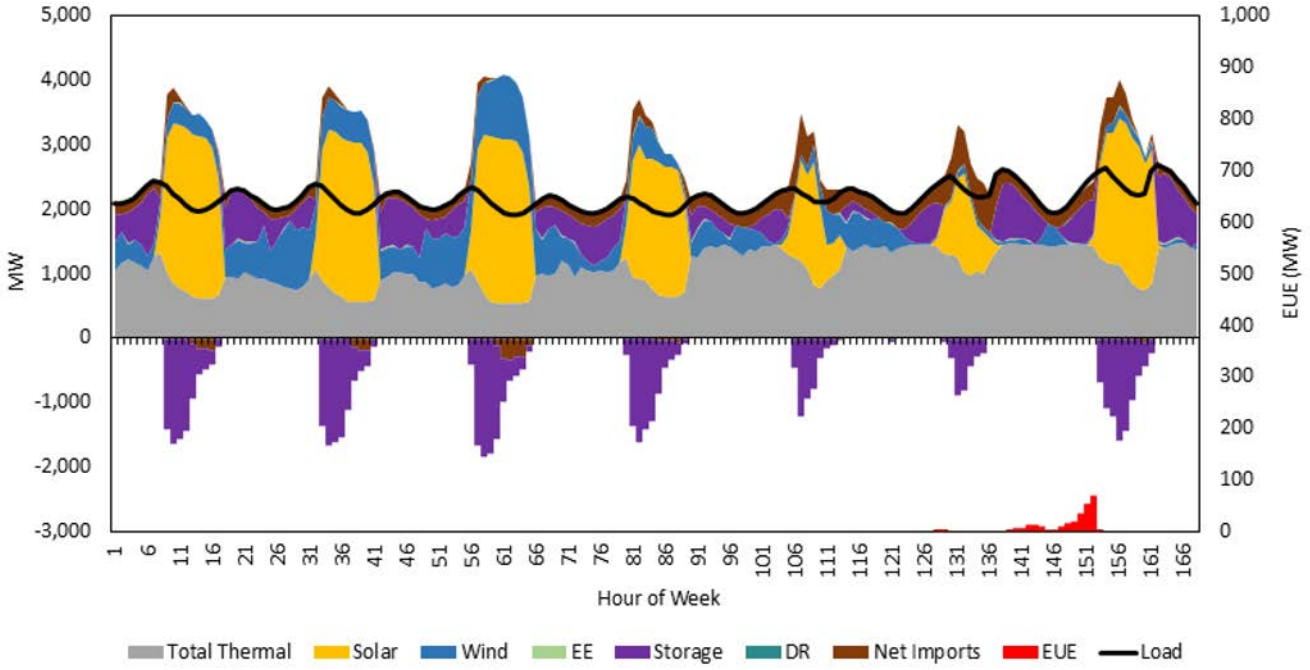


Figure 26: CTP 2036 Winter Islanded Weekly Dispatch

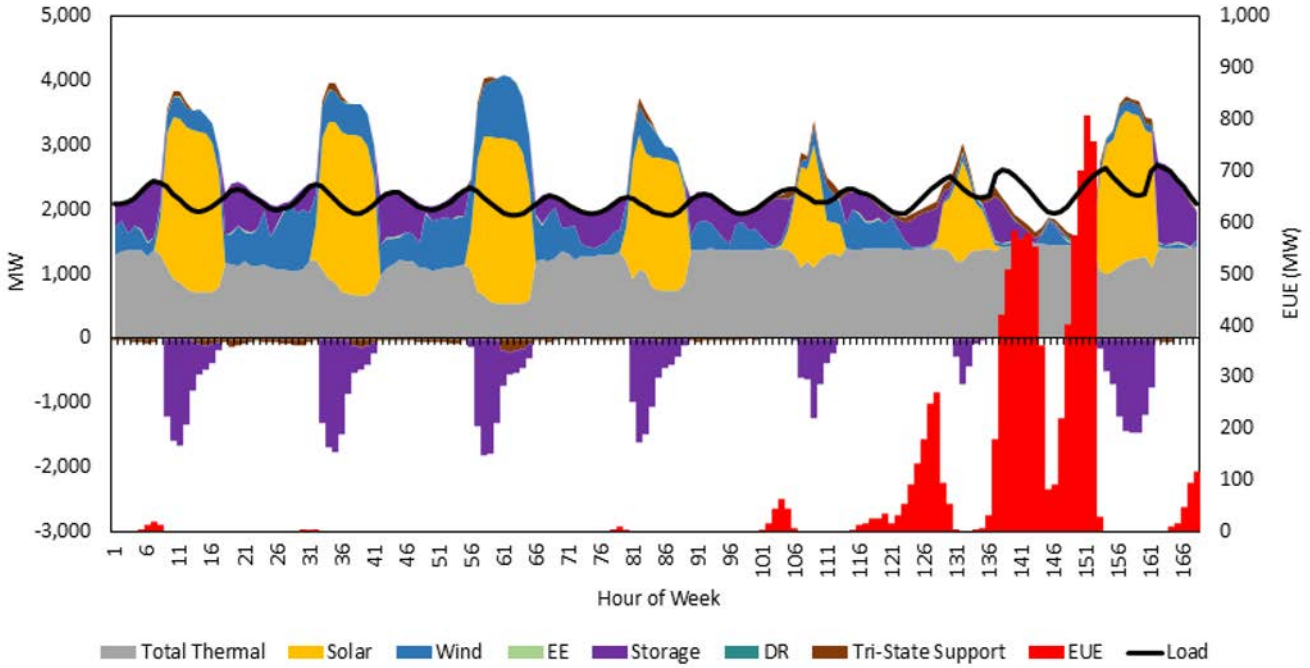


Figure 27: CTP 2040 Winter Interconnected Weekly Dispatch

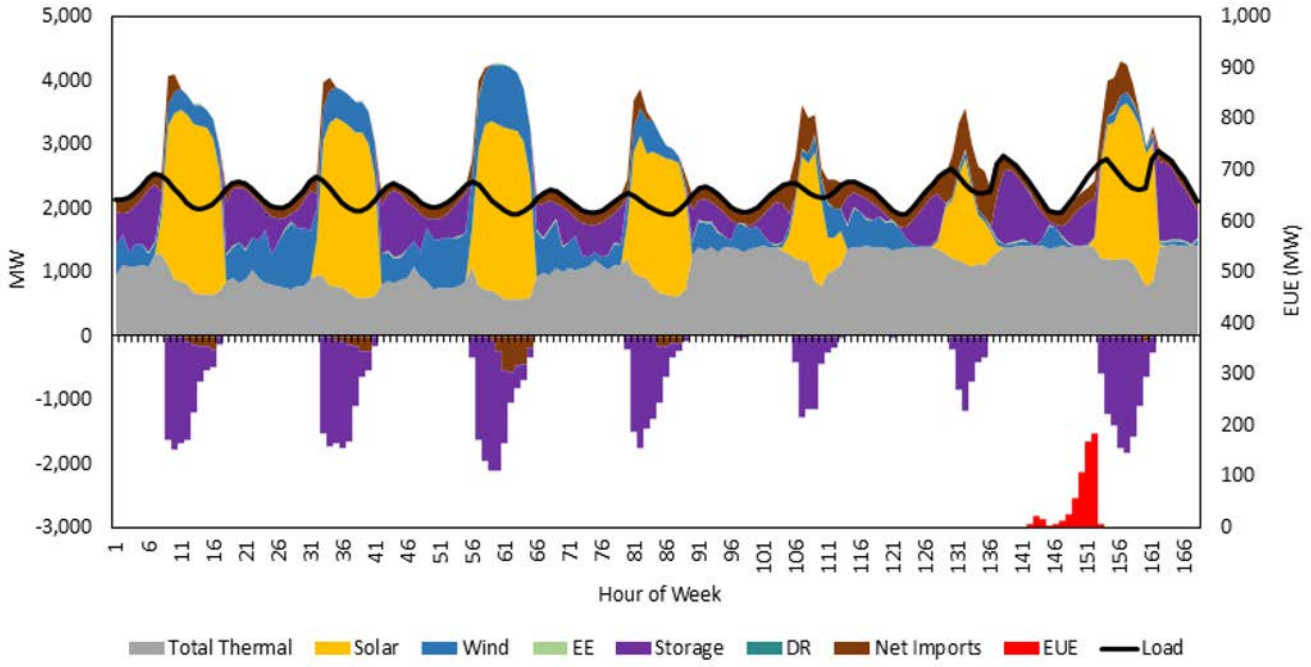


Figure 28: CTP 2040 Winter Islanded Weekly Dispatch

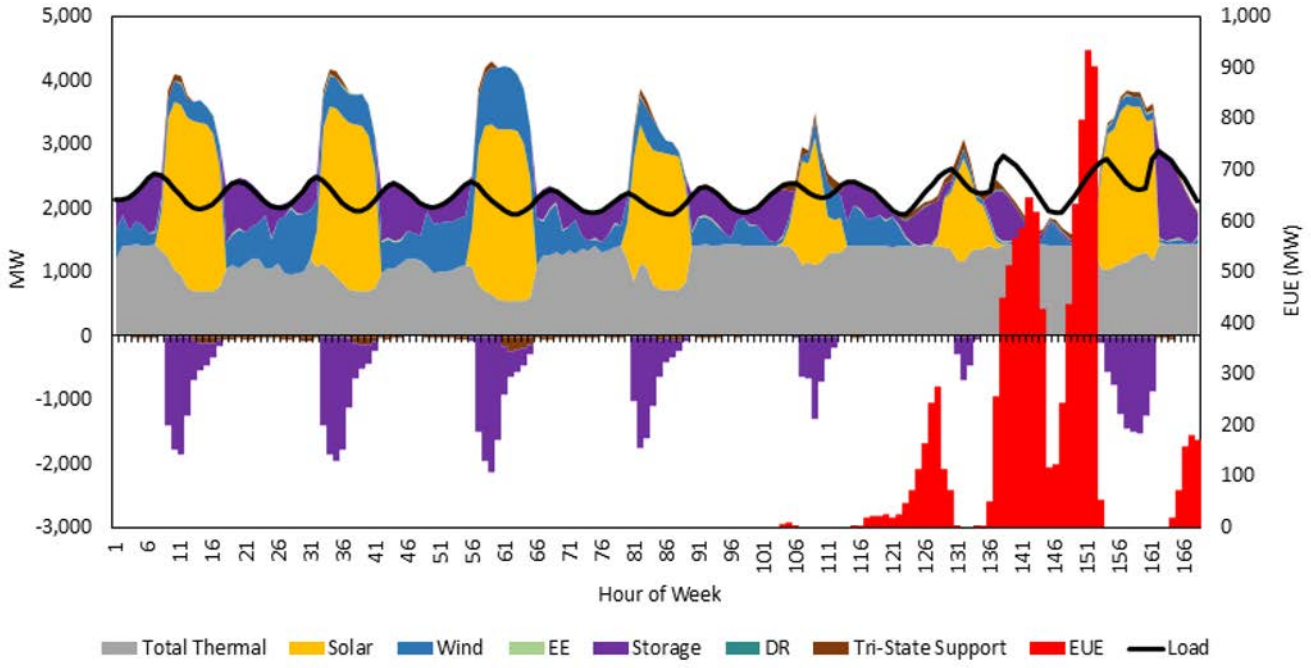


Figure 29: CTP 2045 Winter Interconnected Weekly Dispatch

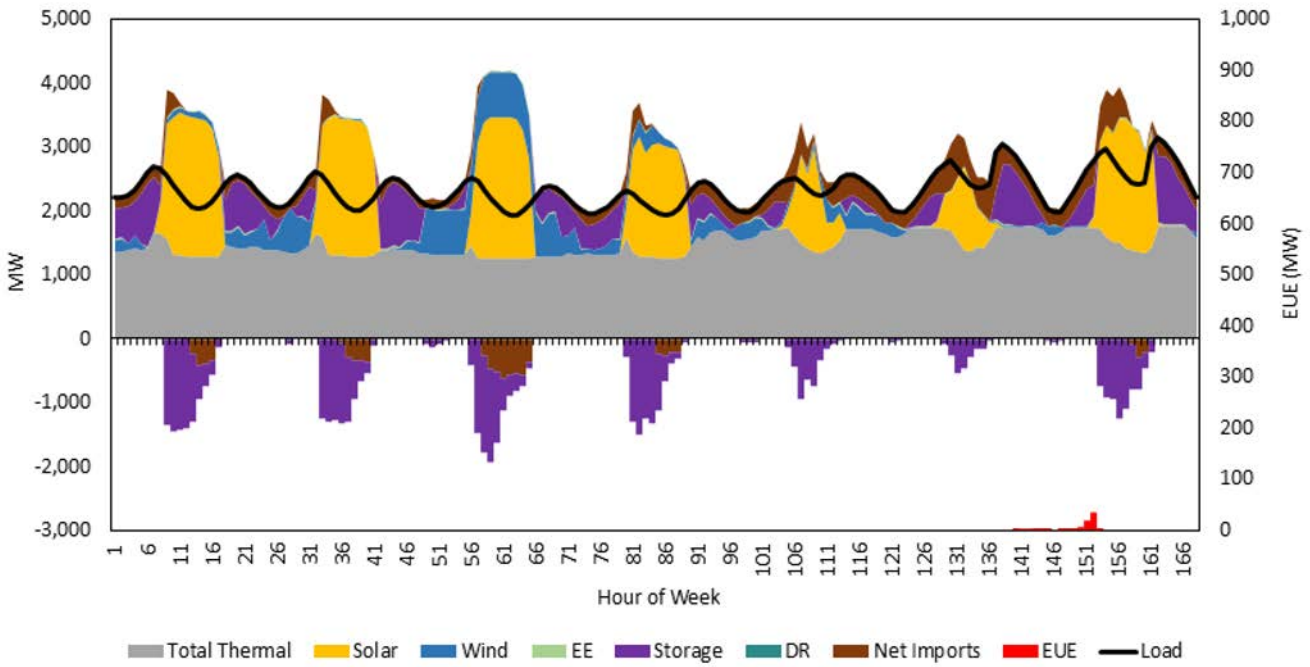


Figure 30: CTP 2045 Winter Islanded Weekly Dispatch

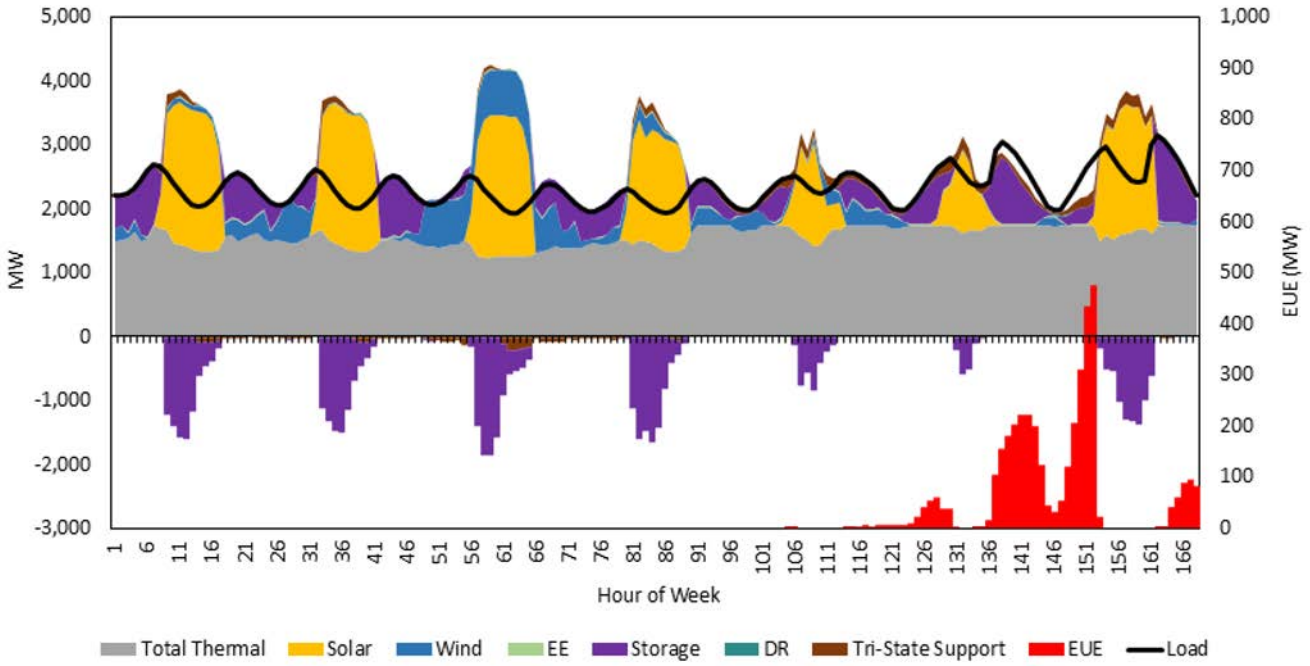


Figure 31: HEG 2036 Summer Interconnected Weekly Dispatch

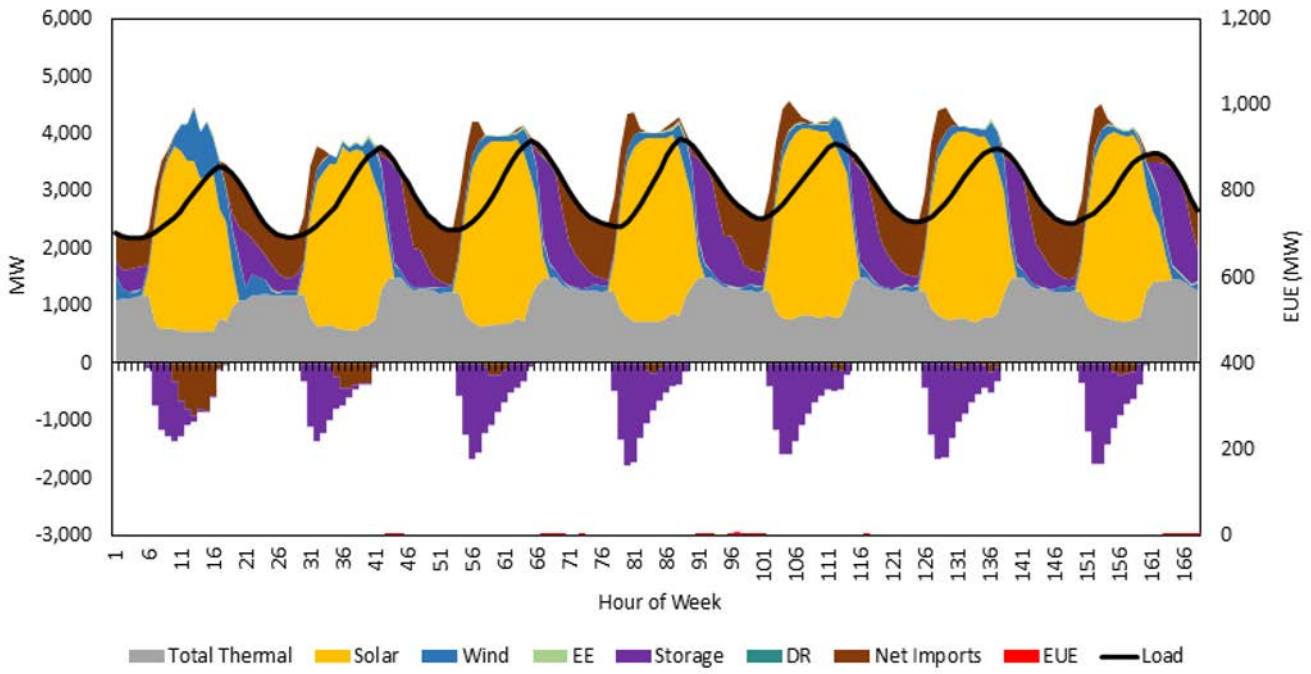


Figure 32: HEG 2036 Summer Islanded Weekly Dispatch

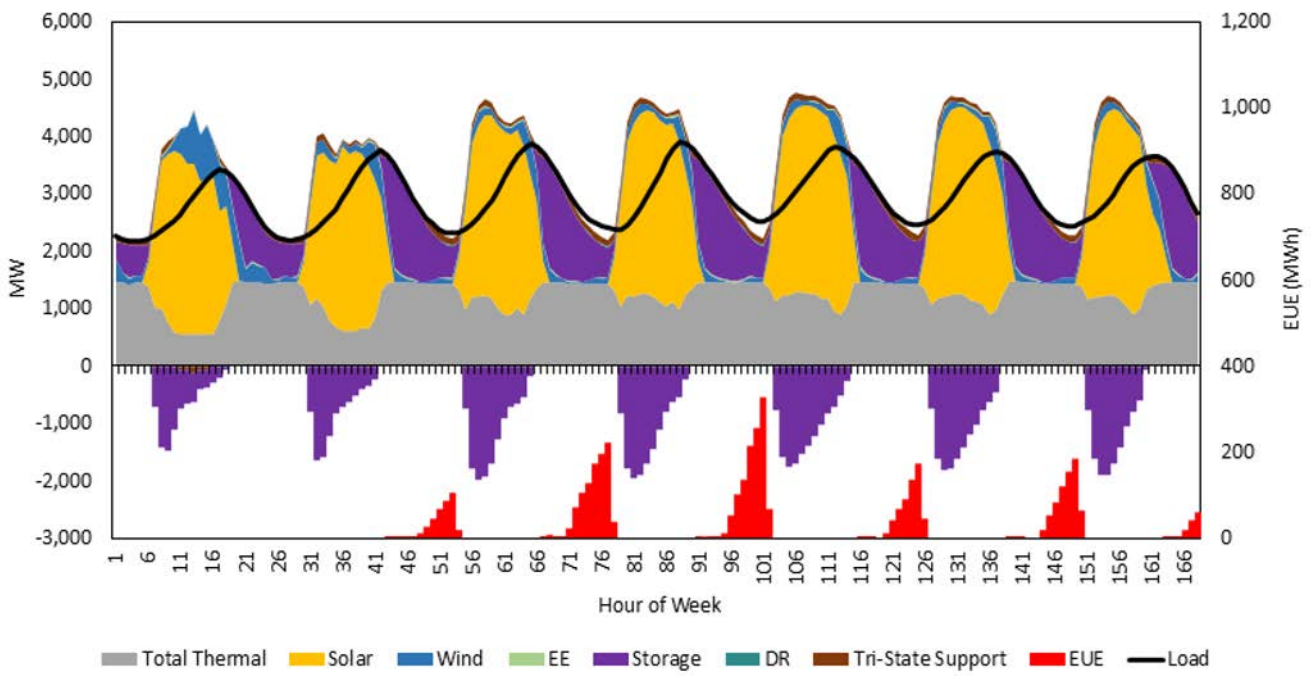


Figure 33: HEG 2040 Summer Interconnected Weekly Dispatch

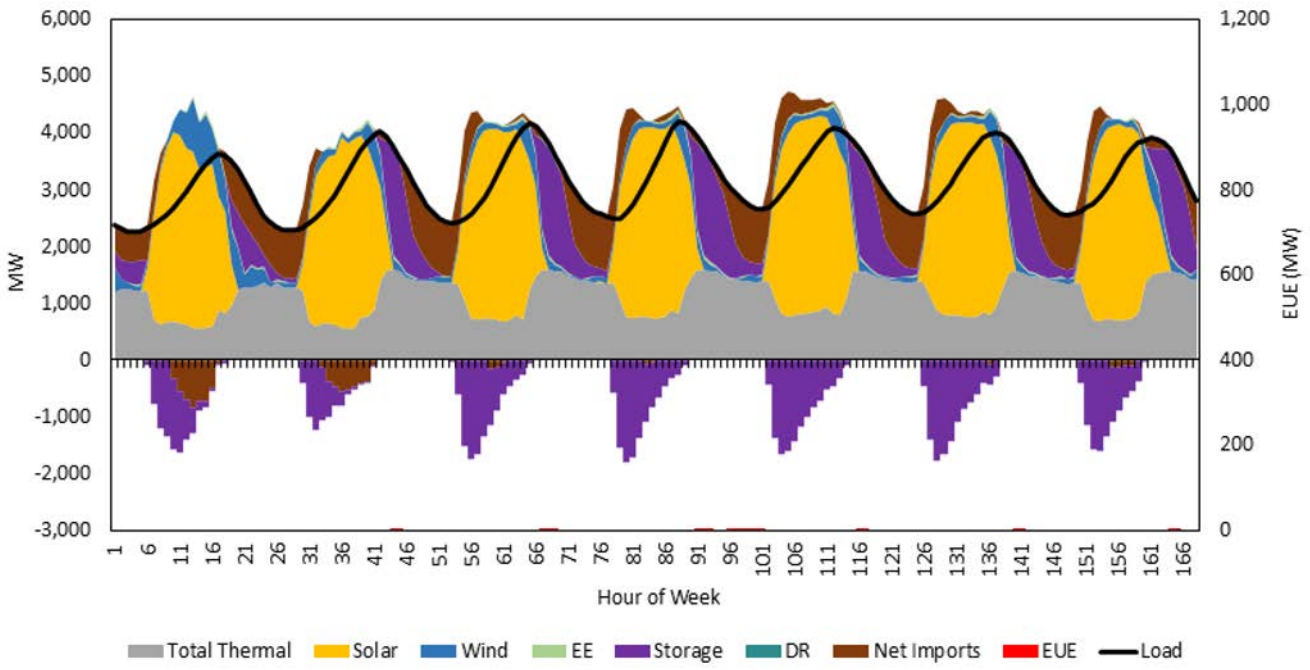


Figure 34: HEG 2040 Summer Islanded Weekly Dispatch

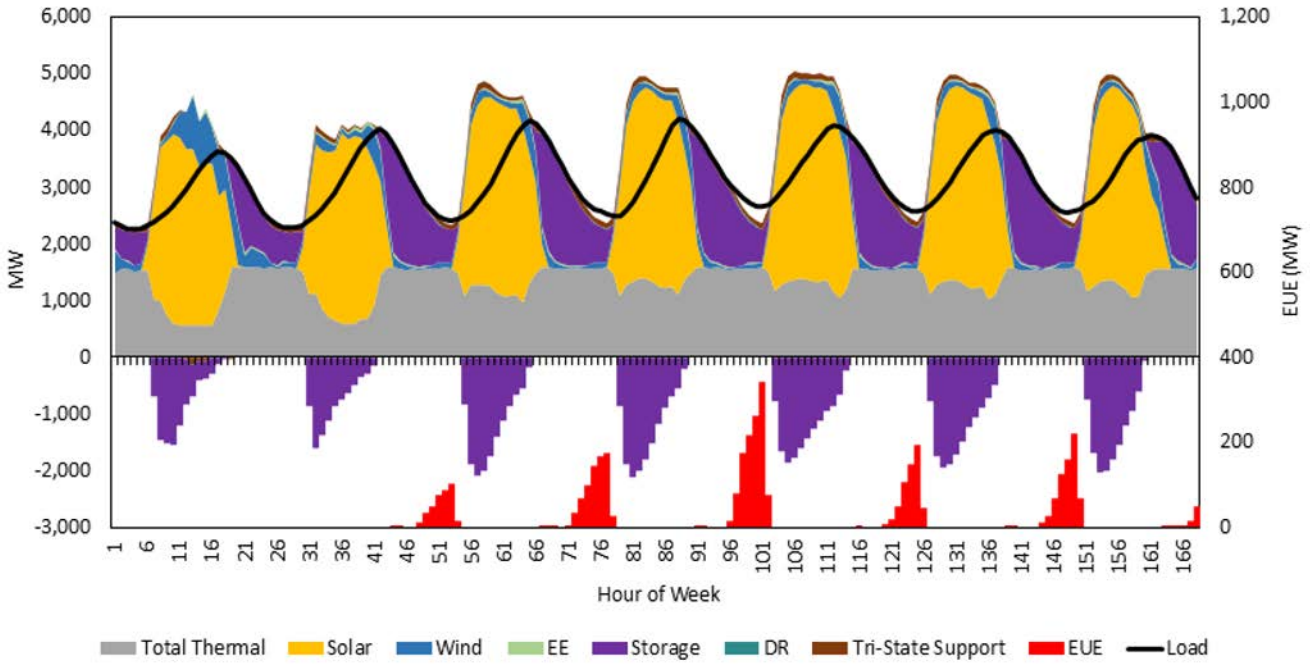


Figure 35: HEG 2045 Summer Interconnected Weekly Dispatch

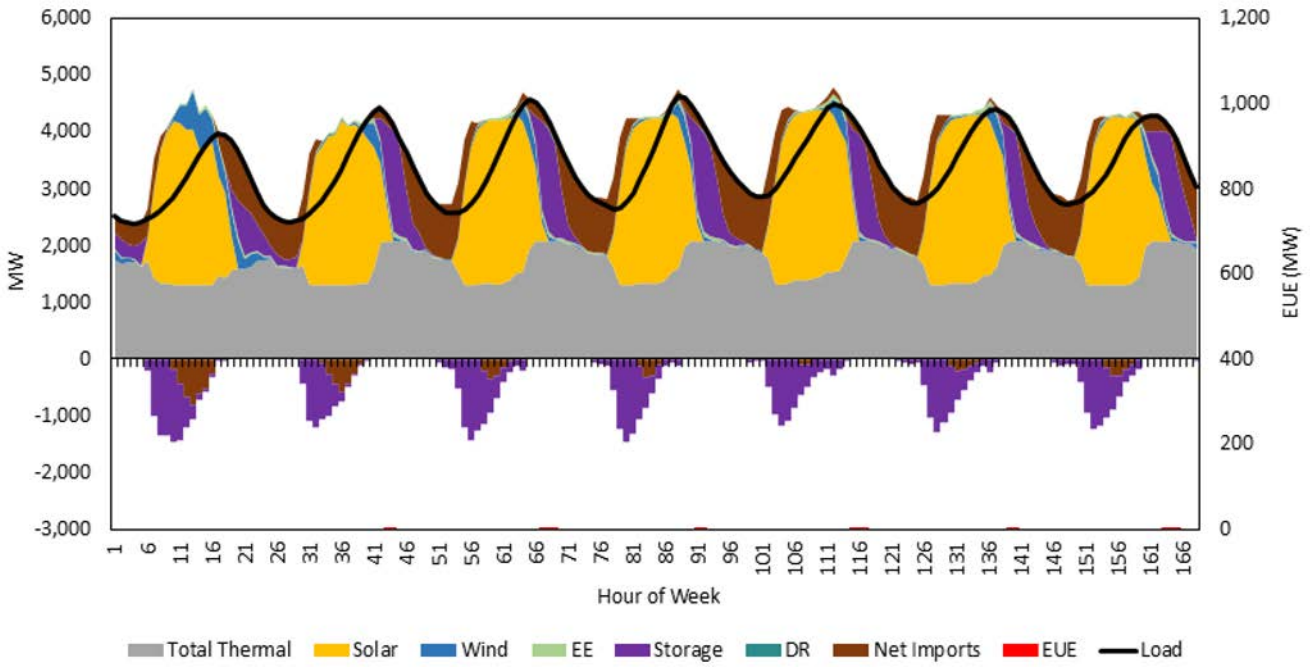


Figure 36: HEG 2045 Summer Islanded Weekly Dispatch

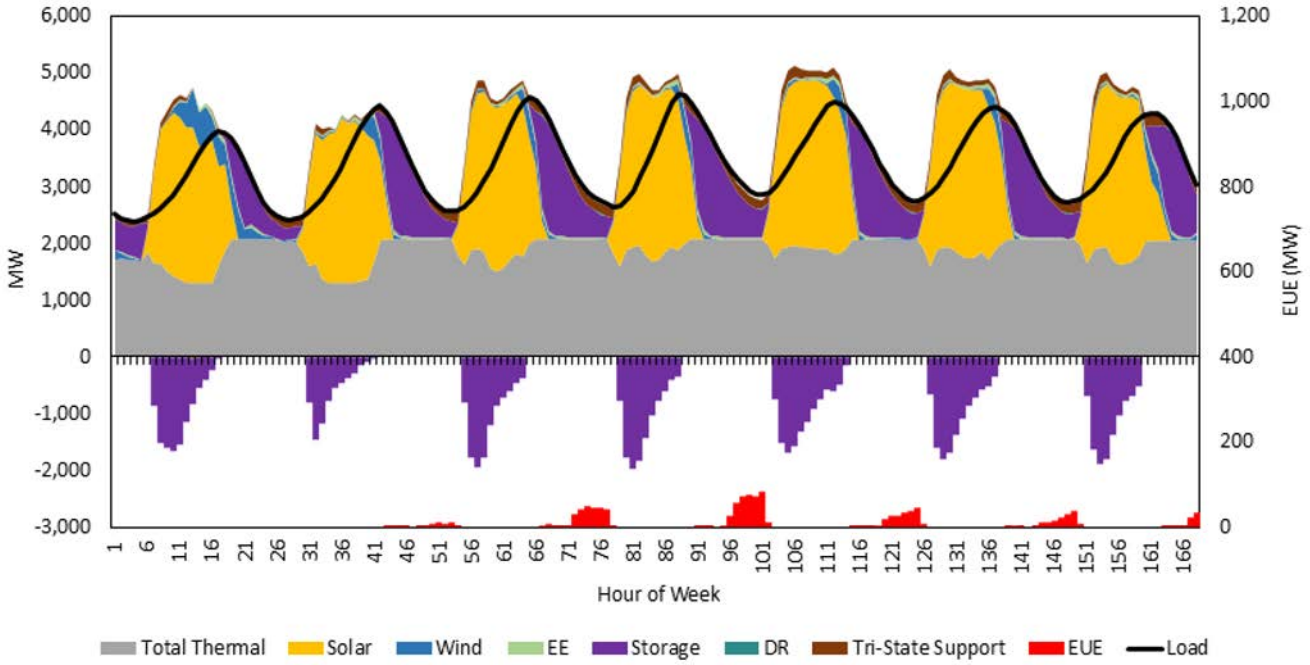


Figure 37: HEG 2036 Winter Interconnected Weekly Dispatch

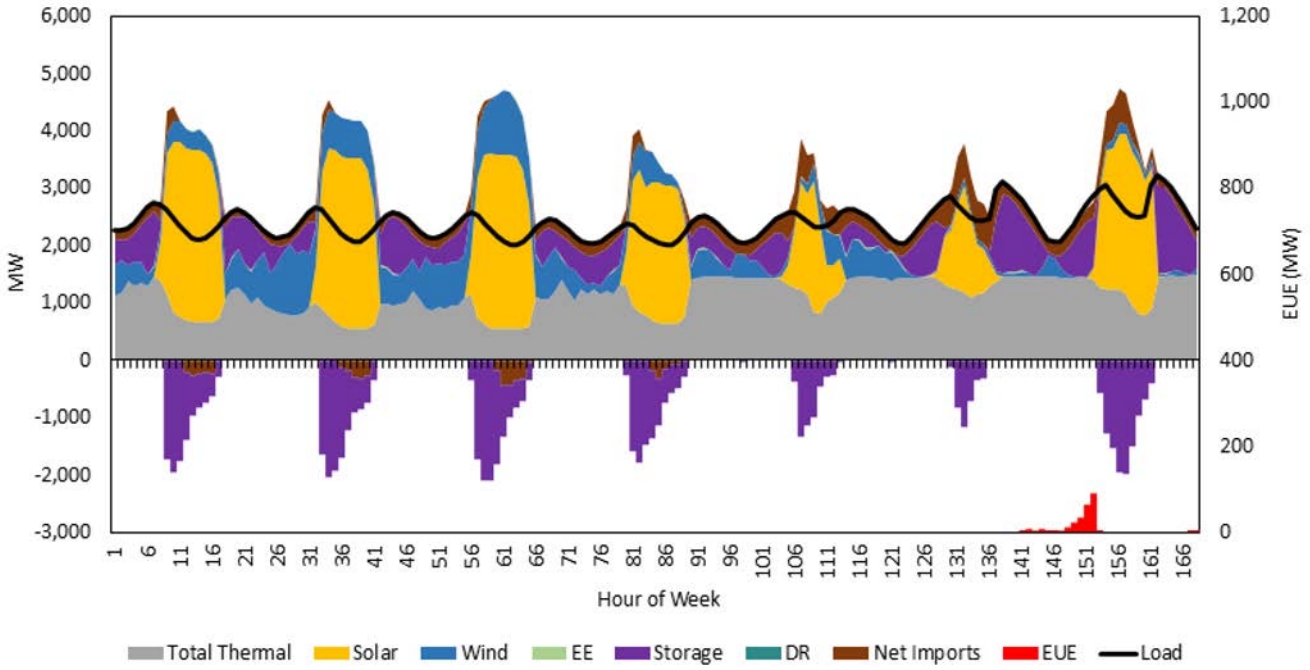


Figure 38: HEG 2036 Winter Islanded Weekly Dispatch

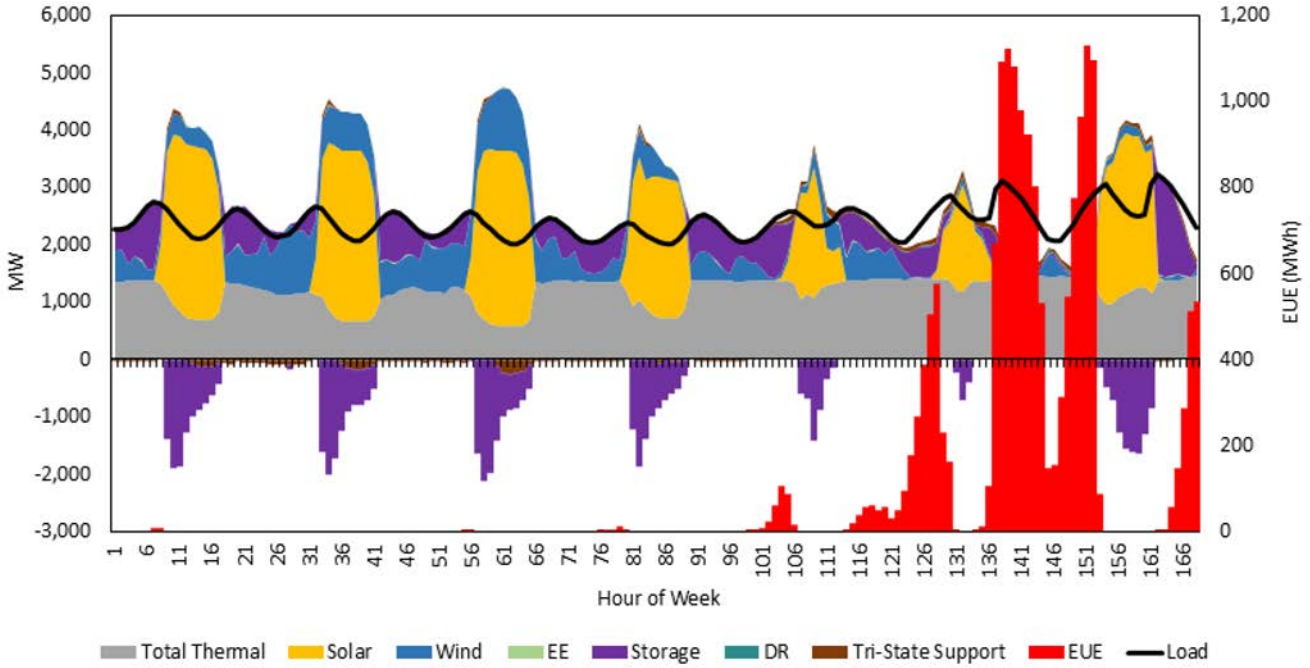


Figure 39: HEG 2040 Winter Interconnected Weekly Dispatch

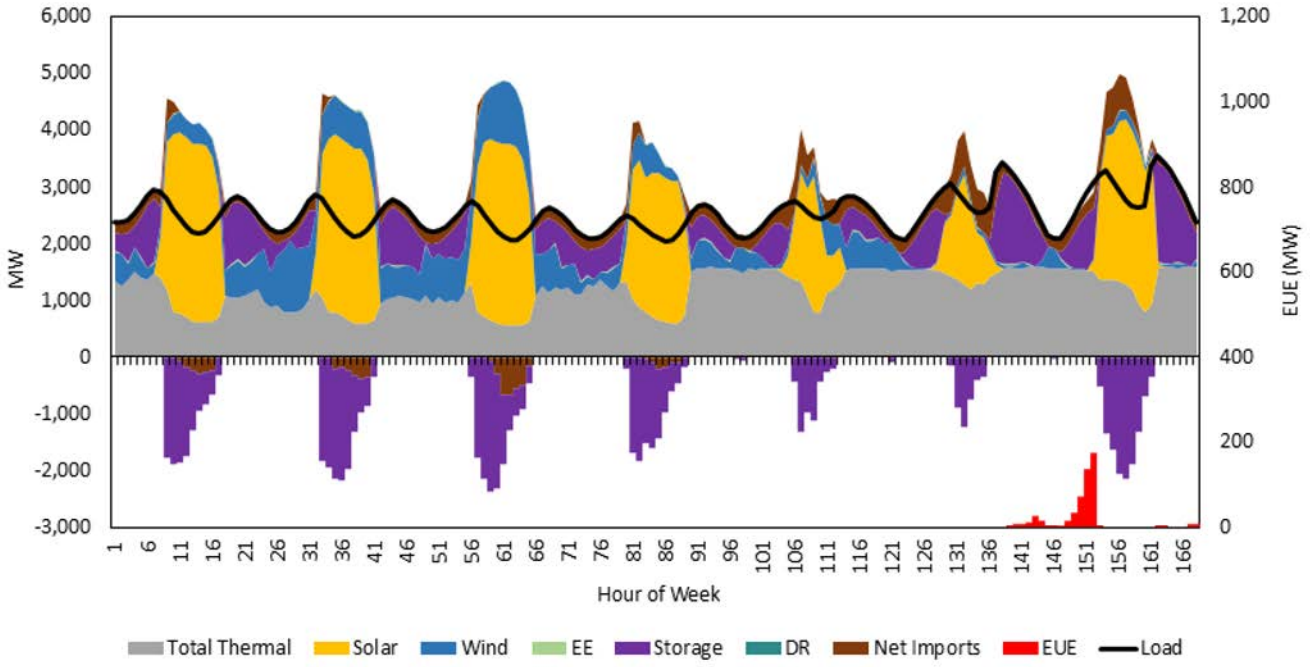


Figure 40: HEG 2040 Winter Islanded Weekly Dispatch

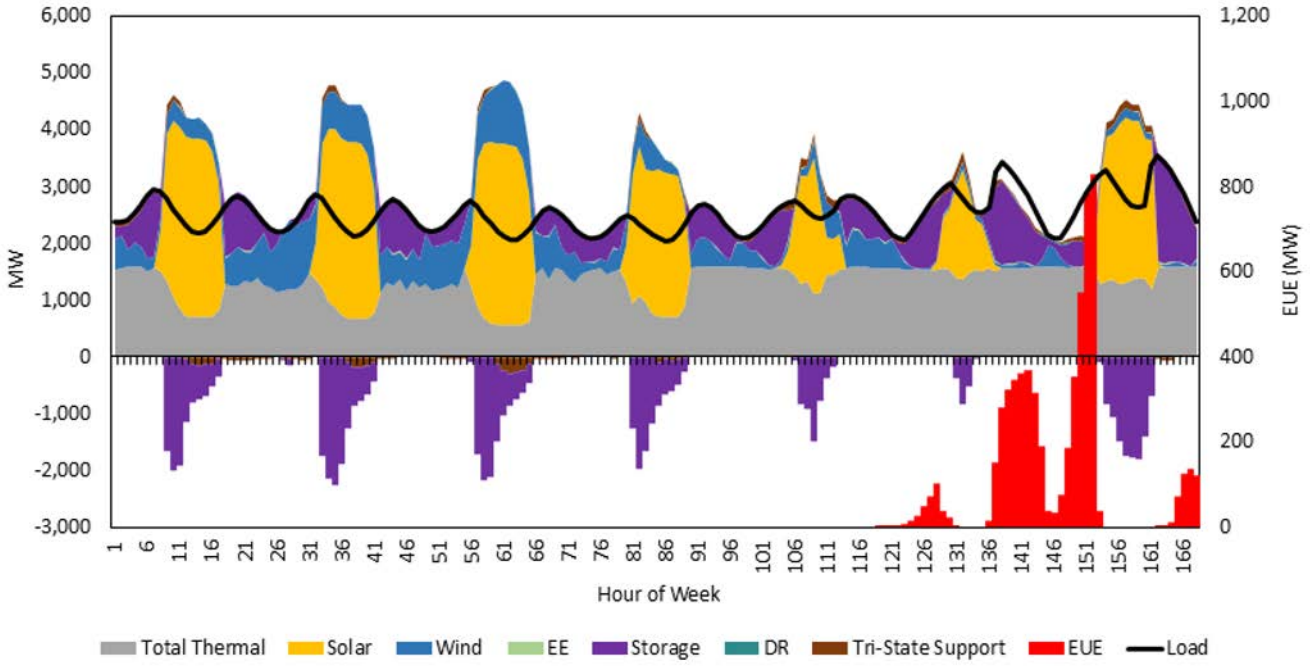


Figure 41: HEG 2045 Winter Interconnected Weekly Dispatch

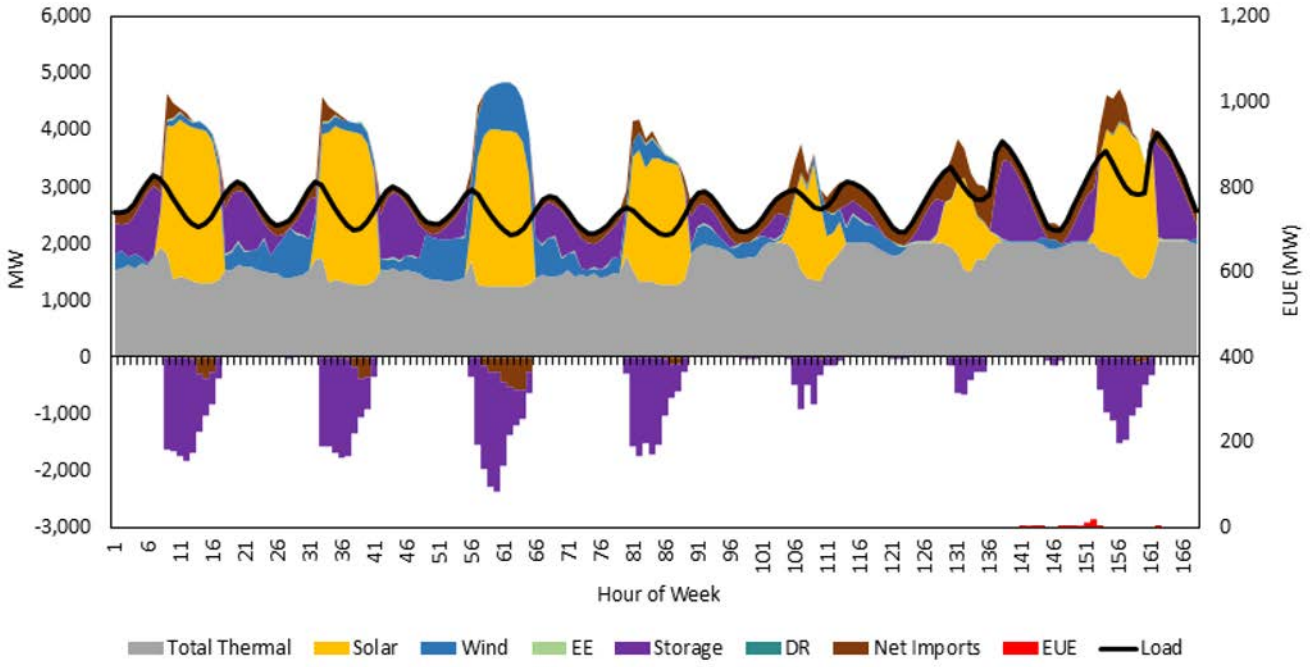
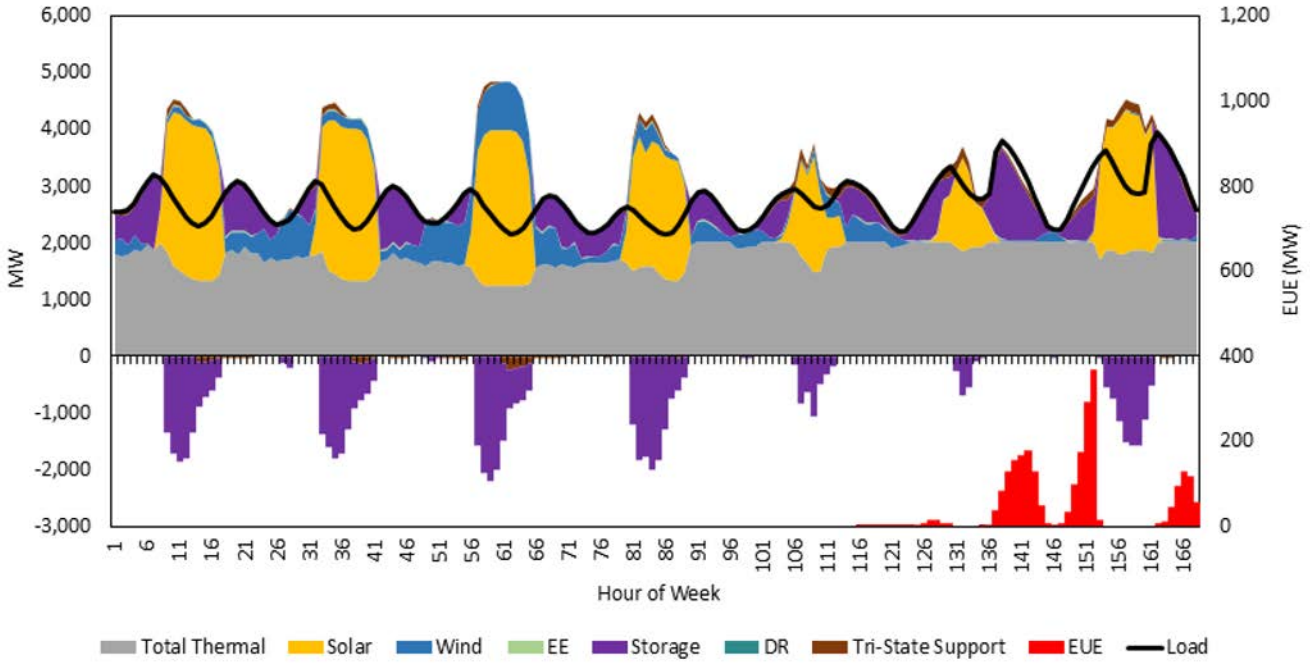


Figure 42: HEG 2045 Winter Islanded Weekly Dispatch



APPENDIX N: SUMMARY RESULTS FOR EACH PORTFOLIO

This appendix provides detailed summaries of the results of each scenario modeled in a standardized and consistent format.

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Portfolio Summary

Scenario Information

Scenario: *CTP P2 8760*
Future: *CTP*
Sensitivity: *Current Trends & Policies base case*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.327	B$
20-Year Carbon Emissions	42.055	M Tons
20-Year Water Consumption	7.292	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	20.88	20.28	18.37	18.16	17.62	17.25	16.38	14.40	14.40	14.40	14.48	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	199	198	198	198	197	197	197	198	170	149	122	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,315	1,319	1,356	1,371	1,395	1,405	1,436	1,448	1,684	1,854	1,947	2,322	3,146
Carbon Emission	k-tons	2,602	2,912	2,892	3,000	3,315	2,975	1,902	1,915	1,927	1,931	1,947	1,965	1,963	1,991	2,017	2,069	1,795	1,595	1,340	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	287	287	287	286	287	285	282	270	293	279	264	267	109

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,776	2,779	2,858	2,910	2,947	2,956	3,068	3,053	3,041	3,010	2,998	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,285	2,392	2,428	2,580	2,462	2,248
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	160	160	160	160	160
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,476**	**8,508**	**8,512**	**8,588**	**8,651**	**8,685**	**8,824**	**8,775**	**9,032**	**8,849**	**9,105**	**9,060**	**7,826**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,693	7,951	7,964	8,197	8,358	8,462	8,487	8,809	8,788	8,695	8,661	8,497	7,632	6,740
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,736	4,741	4,738	4,753	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	48	56	47	49	36	41	54	43	40	30	10	8	7	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,876	2,701	2,801	2,726	2,813	2,792	2,657	2,753	2,641	2,835	2,722	2,455	2,340	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,014	1,150	1,109	1,169	1,151	1,189	1,262	1,249	972	859	588	475	251	72
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	573	672	572	533	374	363
Total Generation	**GWh**	**13,902**	**15,173**	**16,032**	**19,662**	**20,329**	**20,843**	**19,624**	**19,814**	**19,994**	**20,098**	**20,316**	**20,553**	**20,595**	**20,937**	**21,157**	**21,630**	**21,820**	**22,218**	**22,746**	**21,568**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**748**	**768**	**752**	**748**	**755**	**708**	**745**	**719**	**649**	**447**	**397**	**287**	**132**	**635**
Market Sales	**GWh**	**2,201**	**1,867**	**1,424**	**1,336**	**1,497**	**1,790**	**944**	**978**	**1,015**	**936**	**997**	**1,000**	**964**	**1,043**	**1,096**	**1,268**	**1,347**	**1,523**	**1,795**	**1,027**
Net Generation *	**GWh**	**13,643**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,080**	**19,228**	**19,402**	**19,498**	**19,690**	**19,892**	**19,940**	**20,245**	**20,440**	**20,892**	**21,066**	**21,448**	**22,013**	**20,896**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP P2 8760*
Future: *CTP*
Sensitivity: *Current Trends & Policies base case*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.327	B$
20-Year Carbon Emissions	42.055	M Tons
20-Year Water Consumption	7.292	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	111	17	93	66	94	23	125	-	-	-	-	155	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	35	107	36	152	151	237
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**237**	**44**	**121**	**90**	**118**	**47**	**151**	**186**	**317**	**206**	**322**	**623**	**854**

Portfolio Summary

Scenario Information

Scenario: *CTP-CO2 Fed P2 8760*
Future: *CTP*
Sensitivity: *Federal CO2 tax beginning 2030*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.605	B$
20-Year Carbon Emissions	39.501	M Tons
20-Year Water Consumption	7.114	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.80	18.98	19.98	20.92	20.30	18.39	18.19	17.62	17.26	16.37	14.80	14.40	14.40	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	313	267	200	199	199	198	198	198	197	197	158	138	118	127	102	-
Revenue Requirement	M$	523	572	693	1,197	1,243	1,325	1,295	1,338	1,345	1,383	1,402	1,427	1,442	1,475	1,525	1,755	1,923	1,979	2,349	3,144
Carbon Emission	k-tons	2,602	2,912	2,892	3,000	3,049	2,676	1,926	1,929	1,935	1,942	1,961	1,964	1,969	1,989	1,650	1,441	1,241	1,325	1,098	-
Water Consumption	k-gallons	569	610	616	610	616	431	295	289	288	287	287	287	286	282	268	255	245	239	241	112

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,512	2,690	2,750	2,817	2,804	2,890	2,952	2,947	2,977	3,064	3,049	3,037	3,005	2,994	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,310	2,347	2,413	2,298	2,140
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40	120	120	120
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	200	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,886**	**8,431**	**8,321**	**8,518**	**8,533**	**8,544**	**8,630**	**8,651**	**8,706**	**8,819**	**8,761**	**8,971**	**8,789**	**8,993**	**8,957**	**7,778**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,185	7,704	7,898	8,071	8,035	8,291	8,481	8,460	8,546	8,796	8,765	8,677	8,640	8,484	7,632	6,743
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,737	4,741	4,737	4,752	3,932	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,125	378	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	3,549	4,816	5,965	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	52	88	52	61	51	51	40	43	56	44	38	6	4	4	3	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,761	2,887	2,868	2,690	2,795	2,716	2,799	2,783	2,646	2,747	2,464	2,495	2,311	2,265	2,062	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,117	1,581	1,053	1,174	1,122	1,189	1,178	1,190	1,275	1,248	917	496	312	294	152	104
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	130	110	364	245	313
Total Generation	**GWh**	**13,902**	**15,173**	**16,032**	**19,662**	**20,000**	**20,567**	**19,864**	**19,953**	**20,075**	**20,204**	**20,455**	**20,547**	**20,659**	**20,918**	**21,567**	**21,579**	**21,881**	**21,662**	**22,236**	**21,553**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**383**	**300**	**642**	**710**	**718**	**704**	**701**	**712**	**721**	**728**	**523**	**536**	**445**	**562**	**301**	**646**
Market Sales	**GWh**	**2,201**	**1,867**	**1,424**	**1,336**	**1,282**	**1,565**	**1,062**	**1,048**	**1,055**	**988**	**1,065**	**1,000**	**997**	**1,034**	**1,352**	**1,276**	**1,424**	**1,197**	**1,417**	**957**
Net Generation *	**GWh**	**13,643**	**14,864**	**15,601**	**19,170**	**19,510**	**20,022**	**19,304**	**19,356**	**19,476**	**19,594**	**19,812**	**19,887**	**19,997**	**20,227**	**20,822**	**20,812**	**21,095**	**20,848**	**21,467**	**20,815**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-CO2 Fed P2 8760*
Future: *CTP*
Sensitivity: *Federal CO2 tax beginning 2030*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.605	B$
20-Year Carbon Emissions	39.501	M Tons
20-Year Water Consumption	7.114	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	80	192	74	82	0	101	76	52	43	100	-	-	-	-	160	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	60	36	66	156	291
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	-	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	-	80	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	100	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**126**	**557**	**99**	**208**	**27**	**128**	**100**	**76**	**68**	**126**	**177**	**271**	**206**	**270**	**633**	**909**

Portfolio Summary

Scenario Information

Scenario: *CTP-CO2_400thru44 P2 8760*
Future: *CTP*
Sensitivity: *ETA 400 through 2044, zero CO2 by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.188	B$
20-Year Carbon Emissions	48.675	M Tons
20-Year Water Consumption	8.006	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	18.02	17.41	15.70	15.52	14.96	14.59	14.72	14.40	14.48	14.40	14.48	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	262	276	277	274	267	267	257	268	204	183	158	157	120	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,250	1,246	1,255	1,294	1,316	1,340	1,360	1,401	1,490	1,729	1,899	1,982	2,360	3,178
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,315	2,975	2,669	2,829	2,862	2,845	2,779	2,781	2,659	2,795	2,152	1,931	1,688	1,665	1,322	-
Water Consumption	k-gallons	569	610	616	610	647	466	359	372	377	375	368	383	363	368	311	291	281	271	262	109

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,685	2,671	2,763	2,819	2,799	2,790	2,776	2,762	2,750	2,718	2,854	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,272	2,272	2,301	2,597	2,462	2,248
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	80	160	160	160	160	160
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,285**	**8,300**	**8,316**	**8,397**	**8,402**	**8,419**	**8,472**	**8,476**	**8,666**	**8,476**	**8,977**	**9,060**	**7,826**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,693	7,686	7,650	7,919	8,093	8,030	8,004	7,963	7,937	7,846	7,812	8,082	7,632	6,740
Wind	GWh	2,198	2,229	2,197	4,962	4,945	4,974	4,962	4,980	4,956	4,738	4,756	4,737	4,741	4,738	4,753	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	3,549	4,816	5,965	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	118	163	162	168	145	181	165	158	76	17	7	11	5	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	3,109	2,913	3,081	2,939	3,055	3,042	2,846	3,047	2,703	2,781	2,666	2,518	2,315	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,978	2,312	2,240	2,306	2,149	2,124	2,087	2,008	1,239	726	488	518	244	73
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	223	381	620	526	566	369	365
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**20,892**	**21,032**	**21,206**	**21,289**	**21,398**	**21,447**	**21,237**	**21,482**	**21,720**	**21,766**	**22,003**	**21,947**	**22,708**	**21,570**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**222**	**252**	**234**	**266**	**276**	**324**	**439**	**413**	**348**	**344**	**260**	**329**	**130**	**631**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,497**	**1,790**	**1,691**	**1,721**	**1,749**	**1,685**	**1,651**	**1,583**	**1,371**	**1,390**	**1,442**	**1,392**	**1,486**	**1,339**	**1,756**	**1,026**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**20,352**	**20,487**	**20,654**	**20,729**	**20,823**	**20,860**	**20,654**	**20,898**	**21,086**	**21,120**	**21,343**	**21,222**	**21,976**	**20,899**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-CO2_400thru44 P2 8760*
Future: *CTP*
Sensitivity: *ETA 400 through 2044, zero CO2 by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.188	B$
20-Year Carbon Emissions	48.675	M Tons
20-Year Water Consumption	8.006	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	20	-	106	70	36	5	-	-	-	-	147	300	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	22	-	29	297	134	237
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	-	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40	80	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**46**	**27**	**133**	**95**	**61**	**29**	**66**	**239**	**251**	**198**	**567**	**751**	**854**

Portfolio Summary

Scenario Information

Scenario: *CTP-HEV P2 8760*
Future: *CTP*
Sensitivity: *High Electric Vehicle forecast impact to CTP*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.989	B$
20-Year Carbon Emissions	43.170	M Tons
20-Year Water Consumption	11.493	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,294	2,531	2,791	3,292	3,363	3,403	3,416	3,504	3,554	3,636	3,676	3,729	3,778	3,848	3,880	3,920	3,938	3,964	4,019	4,098
PRM	%	14.99	14.95	19.15	18.95	17.18	18.04	18.63	19.11	20.54	18.27	17.59	16.57	15.65	15.22	14.45	14.40	14.40	14.49	14.40	14.75
Carbon Intensity	lbs/MWh	382	392	372	314	336	296	200	199	199	199	198	198	198	197	198	199	180	159	128	-
Revenue Requirement	M$	523	573	694	1,201	1,211	1,297	1,288	1,334	1,383	1,420	1,439	1,468	1,486	1,541	1,593	1,853	2,043	2,156	2,559	3,419
Carbon Emission	k-tons	2,604	2,917	2,901	3,012	3,340	3,017	1,923	1,930	1,966	1,990	1,999	2,019	2,027	2,064	2,100	2,145	1,970	1,770	1,475	-
Water Consumption	k-gallons	569	610	617	612	649	472	294	289	603	606	632	631	631	657	636	671	659	638	630	387

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,455	2,491	2,627	2,739	2,819	2,890	3,026	3,057	3,101	3,142	3,256	3,241	3,229	3,198	3,186	3,320	2,701
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,275	2,292	2,506	2,449	2,298
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	240	240	280	280	280	280
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	200	200	200	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,824**	**7,864**	**8,368**	**8,310**	**8,519**	**8,719**	**8,779**	**8,835**	**8,905**	**8,971**	**9,151**	**9,148**	**9,382**	**9,221**	**9,538**	**9,629**	**8,457**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,901	7,124	7,520	7,866	8,076	8,287	8,685	8,786	8,908	9,025	9,355	9,334	9,241	9,207	9,047	8,394	7,504
Wind	GWh	2,198	2,229	2,197	4,962	4,945	4,974	4,962	4,980	4,955	4,738	4,756	4,737	4,741	4,738	4,753	3,932	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,110	1,139	1,171	396	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	81	81	38	72	137	49	59	47	48	40	45	63	37	20	22	8	6	7	-
Gas Combined Cycle	GWh	2,610	2,826	2,680	2,821	2,851	3,013	2,879	2,701	2,818	2,740	2,831	2,814	2,671	2,772	2,640	2,841	2,768	2,486	2,387	-
Gas/Hydrogen Turbine	GWh	527	871	899	1,004	1,415	1,937	1,044	1,171	1,160	1,253	1,218	1,254	1,345	1,224	759	759	539	450	236	72
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	190	1,086	987	988	935	652	664
Total Generation	**GWh**	**13,906**	**15,181**	**16,045**	**19,707**	**20,390**	**20,934**	**19,831**	**19,964**	**20,384**	**20,683**	**20,833**	**21,093**	**21,239**	**21,661**	**21,983**	**22,390**	**22,778**	**23,175**	**23,818**	**22,633**
Market Purchases	**GWh**	**41**	**121**	**323**	**308**	**278**	**242**	**741**	**813**	**727**	**675**	**735**	**716**	**752**	**728**	**652**	**533**	**438**	**339**	**170**	**688**
Market Sales	**GWh**	**2,199**	**1,859**	**1,410**	**1,329**	**1,480**	**1,762**	**963**	**945**	**1,060**	**1,047**	**1,029**	**1,008**	**983**	**1,057**	**1,118**	**1,191**	**1,342**	**1,446**	**1,704**	**838**
Net Generation *	**GWh**	**13,648**	**14,872**	**15,614**	**19,215**	**19,902**	**20,402**	**19,275**	**19,369**	**19,748**	**20,022**	**20,153**	**20,381**	**20,523**	**20,909**	**21,211**	**21,572**	**21,952**	**22,340**	**22,993**	**21,843**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-HEV P2 8760*
Future: *CTP*
Sensitivity: *High Electric Vehicle forecast impact to CTP*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.989	B$
20-Year Carbon Emissions	43.170	M Tons
20-Year Water Consumption	11.493	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	137	50	150	126	94	85	150	45	101	54	128	-	-	-	-	229	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	25	17	214	213	299
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	200	-	40	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	100	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,419**	**96**	**515**	**151**	**221**	**212**	**178**	**69**	**125**	**79**	**194**	**231**	**295**	**227**	**384**	**759**	**917**

Portfolio Summary

Scenario Information

Scenario: *CTP-LateLDES P2 8760*
Future: *CTP*
Sensitivity: *Late Long Duration Energy Storage available beginning 2036*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.290	B$
20-Year Carbon Emissions	42.016	M Tons
20-Year Water Consumption	7.321	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	18.15	17.57	15.78	15.60	15.10	14.75	15.97	14.40	14.55	14.40	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	198	198	198	197	197	196	188	198	173	150	121	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,278	1,288	1,327	1,344	1,371	1,382	1,448	1,494	1,713	1,871	1,960	2,338	3,173
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,315	2,975	1,902	1,904	1,913	1,930	1,948	1,972	1,971	1,988	2,014	2,047	1,810	1,598	1,323	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	287	286	286	286	287	284	268	291	297	285	271	270	112

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,743	2,738	2,855	2,915	2,970	2,982	3,021	3,006	2,994	2,962	2,951	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,269	2,417	2,298	2,140
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	80	80	120	120	120	120	120
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	200	200	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,343**	**8,367**	**8,409**	**8,493**	**8,573**	**8,611**	**8,756**	**8,698**	**8,902**	**8,702**	**8,954**	**8,957**	**7,778**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,693	7,854	7,846	8,188	8,372	8,523	8,560	8,670	8,635	8,558	8,524	8,362	7,632	6,743
Wind	GWh	2,198	2,229	2,197	4,962	4,945	4,974	4,962	4,980	4,956	4,738	4,756	4,737	4,741	4,738	4,752	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	3,549	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	48	58	48	51	39	44	54	26	56	36	16	16	7	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,876	2,699	2,797	2,718	2,806	2,785	2,647	2,750	2,605	2,842	2,750	2,468	2,336	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,014	1,131	1,090	1,171	1,155	1,201	1,280	998	1,128	936	678	545	288	104
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	376	356	497	443	421	292	313
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**19,624**	**19,699**	**19,853**	**20,084**	**20,329**	**20,624**	**20,676**	**20,903**	**22,162**	**21,409**	**21,677**	**22,061**	**22,697**	**21,553**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**748**	**820**	**822**	**758**	**761**	**692**	**724**	**734**	**290**	**547**	**471**	**345**	**145**	**646**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,498**	**1,790**	**944**	**947**	**968**	**949**	**1,035**	**1,092**	**1,048**	**1,069**	**1,780**	**1,128**	**1,261**	**1,396**	**1,708**	**957**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,080**	**19,146**	**19,285**	**19,501**	**19,721**	**20,000**	**20,045**	**20,255**	**21,482**	**20,652**	**20,906**	**21,264**	**21,914**	**20,815**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-LateLDES P2 8760*
Future: *CTP*
Sensitivity: *Late Long Duration Energy Storage available beginning 2036*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.290	B$
20-Year Carbon Emissions	42.016	M Tons
20-Year Water Consumption	7.321	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	78	10	131	74	111	26	52	-	-	-	-	203	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	-	19	148	152	291
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	-	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	80	-	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**104**	**36**	**158**	**98**	**136**	**51**	**158**	**177**	**265**	**188**	**318**	**672**	**909**

Portfolio Summary

Scenario Information

Scenario: *CTP-NoETA P2 8760*
Future: *CTP*
Sensitivity: *No CO2 emission limits, No RPS, No CO2 free by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.703	B$
20-Year Carbon Emissions	51.460	M Tons
20-Year Water Consumption	12.231	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.16	18.25	19.25	17.48	19.52	17.62	17.42	16.83	16.48	15.52	14.76	15.65	14.40	16.11	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	335	293	263	276	267	265	256	258	243	253	237	208	212	185	175	170
Revenue Requirement	M$	523	572	693	1,197	1,197	1,280	1,243	1,240	1,294	1,325	1,344	1,365	1,385	1,406	1,435	1,632	1,690	1,749	2,021	2,333
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,320	2,979	2,673	2,830	2,769	2,764	2,681	2,700	2,532	2,655	2,448	2,128	2,137	1,894	1,791	1,753
Water Consumption	k-gallons	569	610	616	610	647	466	359	372	655	654	674	694	671	726	676	656	661	655	654	605

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,689	2,781	2,865	2,929	2,892	2,938	2,924	2,909	2,897	2,930	2,918	3,110	2,471
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	2	5	10	12	14	15	15	15	16	16	16	16	17	17	17	19
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,130	2,047
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	434	580	726	872
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	666	666	666	666	666	666
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,826**	**8,330**	**8,221**	**8,260**	**8,479**	**8,488**	**8,577**	**8,565**	**8,636**	**8,648**	**8,621**	**8,730**	**8,429**	**8,533**	**8,472**	**7,778**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,877	7,100	7,497	7,693	7,699	7,969	8,217	8,412	8,302	8,433	8,393	8,371	8,277	8,430	8,267	7,783	6,838
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,737	4,741	4,738	4,753	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	2	6	12	16	18	19	20	20	21	21	21	22	22	22	22	22
Coal	GWh	1,090	1,073	1,109	1,139	1,171	396	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	3,491	4,807	6,063	7,042
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	69	128	119	164	140	143	110	149	135	150	102	36	36	28	21	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	3,109	2,911	3,074	2,946	3,041	3,033	2,817	3,011	2,817	2,897	2,931	2,636	2,738	2,628
Gas/Hydrogen Turbine	GWh	525	866	891	990	1,391	1,899	1,983	2,314	2,125	2,202	2,046	2,039	1,943	1,976	1,895	1,401	1,393	1,215	974	1,023
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,323**	**20,838**	**20,886**	**21,033**	**21,368**	**21,453**	**21,555**	**21,581**	**21,451**	**21,601**	**21,317**	**21,139**	**20,808**	**21,148**	**21,165**	**21,158**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**269**	**235**	**223**	**251**	**202**	**230**	**236**	**288**	**379**	**394**	**534**	**623**	**807**	**725**	**766**	**744**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,495**	**1,786**	**1,688**	**1,722**	**1,832**	**1,766**	**1,716**	**1,636**	**1,464**	**1,430**	**1,221**	**1,036**	**841**	**975**	**932**	**871**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,837**	**20,309**	**20,349**	**20,488**	**20,769**	**20,846**	**20,928**	**20,949**	**20,806**	**20,957**	**20,680**	**20,484**	**20,150**	**20,462**	**20,517**	**20,630**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-NoETA P2 8760*
Future: *CTP*
Sensitivity: *No CO2 emission limits, No RPS, No CO2 free by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.703	B$
20-Year Carbon Emissions	51.460	M Tons
20-Year Water Consumption	12.231	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	50	150	74	24	105	99	77	20	59	-	-	-	64	-	286	280
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	16	-	-	-	-	-	-	-	-	-	1	-	-	-	-	2
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	-	-	-	150	367
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	-	146	146	146
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	179	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**66**	**515**	**100**	**51**	**232**	**124**	**102**	**45**	**83**	**26**	**207**	**171**	**88**	**170**	**607**	**820**

Portfolio Summary

Scenario Information

Scenario: *CTP-NoNewGas P2 8760*
Future: *CTP*
Sensitivity: *Remove all new gas fired resource candidates*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.370	B$
20-Year Carbon Emissions	40.985	M Tons
20-Year Water Consumption	7.361	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	20.88	20.28	18.37	18.16	17.73	17.49	16.58	15.01	14.40	14.40	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	199	198	198	197	197	196	183	159	136	142	108	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,315	1,319	1,356	1,371	1,398	1,411	1,439	1,482	1,718	1,885	1,946	2,323	3,151
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,315	2,975	1,902	1,915	1,927	1,931	1,947	1,956	1,978	1,972	1,947	1,683	1,448	1,500	1,182	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	287	287	287	286	287	287	281	305	292	276	279	264	132

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,776	2,779	2,858	2,910	2,854	2,888	2,874	2,860	2,848	2,816	2,854	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,414	1,451	1,470	1,470	1,470	1,164	1,164	914	930
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,408	2,445	2,464	2,336	2,162
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	300	300	300
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,476**	**8,508**	**8,512**	**8,588**	**8,616**	**8,712**	**8,744**	**8,686**	**8,954**	**8,772**	**8,998**	**9,089**	**7,909**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,693	7,951	7,964	8,197	8,358	8,190	8,288	8,248	8,221	8,131	8,097	8,084	7,635	6,745
Wind	GWh	2,198	2,229	2,197	4,962	4,945	4,974	4,962	4,980	4,956	4,738	4,756	4,937	5,066	5,130	5,147	4,325	3,956	3,736	3,150	3,191
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	3,549	4,816	5,965	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	48	56	47	49	36	41	56	38	79	29	9	22	8	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,876	2,701	2,801	2,726	2,813	2,800	2,668	2,780	2,624	2,695	2,574	2,484	2,242	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,014	1,150	1,109	1,169	1,151	1,170	1,274	1,205	1,233	815	540	669	332	279
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**19,624**	**19,814**	**19,994**	**20,098**	**20,316**	**20,470**	**20,747**	**20,747**	**21,933**	**21,839**	**22,117**	**21,903**	**22,754**	**21,862**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**748**	**768**	**752**	**748**	**755**	**721**	**653**	**753**	**304**	**331**	**238**	**370**	**121**	**572**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,497**	**1,790**	**944**	**978**	**1,015**	**936**	**997**	**960**	**1,036**	**943**	**1,535**	**1,372**	**1,490**	**1,265**	**1,694**	**1,097**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,080**	**19,228**	**19,402**	**19,498**	**19,690**	**19,838**	**20,104**	**20,111**	**21,224**	**21,113**	**21,369**	**21,108**	**21,924**	**21,029**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-NoNewGas P2 8760*
Future: *CTP*
Sensitivity: *Remove all new gas fired resource candidates*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.370	B$
20-Year Carbon Emissions	40.985	M Tons
20-Year Water Consumption	7.361	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	111	17	93	66	-	48	-	-	-	-	49	300	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	58	36	20	-	-	-	-	-	15
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	158	36	19	142	276
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	-	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	200	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**237**	**44**	**121**	**90**	**83**	**109**	**46**	**177**	**329**	**206**	**292**	**759**	**908**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS ETA Step Down 8760*
Future: *CTP*
Sensitivity: *Smooth out' the acquisition of new clean firm resources*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.676	B$
20-Year Carbon Emissions	34.211	M Tons
20-Year Water Consumption	6.604	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.16	18.25	19.25	21.30	20.69	19.10	18.89	18.33	21.87	20.88	15.43	17.33	17.03	14.48	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	335	293	199	199	199	154	154	153	109	109	109	65	65	65	65	-
Revenue Requirement	M$	523	572	693	1,197	1,201	1,284	1,269	1,336	1,336	1,402	1,412	1,432	1,568	1,590	1,523	1,862	2,011	1,985	2,294	3,075
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,320	2,979	1,901	1,938	1,947	1,509	1,524	1,541	1,114	1,119	1,126	686	711	700	688	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	289	290	243	246	247	205	207	211	174	189	187	193	111

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,846	2,840	3,112	3,177	3,229	3,216	3,282	3,281	3,269	3,238	3,226	3,213	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,409	1,409	1,409	1,409	1,409	1,409	1,409	1,103	1,103	853	853
Demand Response	MW	70	70	70	70	2	5	10	12	14	15	15	15	16	16	18	20	21	21	21	21
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,656	2,656	2,656	2,656	2,656	2,656	2,656	2,656	2,656	2,656	2,657	2,424	2,166
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	434	434	434	726	872	872	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	120
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,826**	**8,330**	**8,221**	**8,822**	**8,845**	**9,094**	**9,184**	**9,261**	**9,419**	**9,511**	**9,322**	**9,578**	**9,359**	**9,419**	**9,219**	**7,827**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,877	7,100	7,497	7,693	8,153	8,141	8,934	9,135	9,277	9,234	9,419	9,438	9,299	9,219	9,106	8,077	6,743
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,922	4,940	4,920	4,924	4,920	4,935	4,108	3,748	3,527	2,941	2,930
Demand Response	GWh	29	29	29	29	2	6	12	16	18	19	20	20	21	21	22	22	22	22	22	22
Coal	GWh	1,090	1,073	1,109	1,139	1,171	396	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	3,572	3,462	3,549	6,053	7,201	7,281	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	69	128	48	57	47	19	15	15	4	3	6	1	1	1	0	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,874	2,705	2,814	2,484	2,583	2,569	2,154	2,181	2,137	1,536	1,579	1,534	1,490	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,391	1,899	1,013	1,181	1,131	695	653	692	295	287	332	38	49	59	25	78
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	67	287
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,323**	**20,838**	**19,609**	**20,041**	**20,194**	**20,260**	**20,516**	**20,794**	**21,229**	**21,380**	**21,465**	**22,051**	**22,760**	**22,361**	**21,974**	**21,672**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**269**	**235**	**755**	**622**	**648**	**748**	**732**	**693**	**572**	**623**	**622**	**475**	**221**	**453**	**495**	**614**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,495**	**1,786**	**938**	**1,055**	**1,102**	**1,025**	**1,107**	**1,179**	**1,349**	**1,333**	**1,340**	**1,673**	**2,057**	**1,719**	**1,291**	**1,035**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,837**	**20,309**	**19,067**	**19,451**	**19,593**	**19,586**	**19,822**	**20,086**	**20,499**	**20,631**	**20,711**	**21,270**	**21,952**	**21,478**	**21,147**	**20,925**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS ETA Step Down 8760*
Future: *CTP*
Sensitivity: *Smooth out' the acquisition of new clean firm resources*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.676	B$
20-Year Carbon Emissions	34.211	M Tons
20-Year Water Consumption	6.604	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	50	150	74	181	8	286	79	109	-	80	15	-	-	-	81	146
Wind	MW	-	-	-	800	-	-	-	-	-	53	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	16	-	-	-	-	-	-	-	-	-	6	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	406	-	-	-	-	-	-	-	-	-	1	37	193
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	146	-	-	292	146	-	146	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	100	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**66**	**515**	**100**	**613**	**35**	**365**	**103**	**133**	**171**	**106**	**46**	**317**	**170**	**125**	**469**	**696**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS Geo 8760*
Future: *CTP*
Sensitivity: *At most one 50MW conventional geothermal, and unlimited 50MW EGS can be selected*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.327	B$
20-Year Carbon Emissions	41.998	M Tons
20-Year Water Consumption	7.312	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	20.88	20.28	18.37	18.16	17.62	17.25	16.38	14.40	14.89	14.58	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	199	198	198	198	197	197	197	198	170	148	121	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,315	1,319	1,356	1,371	1,395	1,405	1,436	1,448	1,695	1,853	1,939	2,315	3,152
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,315	2,975	1,902	1,915	1,927	1,931	1,947	1,965	1,963	1,991	2,017	2,060	1,782	1,575	1,325	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	287	287	287	286	287	285	282	270	298	282	268	270	112

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,776	2,779	2,858	2,910	2,947	2,956	3,068	3,053	3,041	3,010	2,998	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,285	2,285	2,285	2,412	2,298	2,140
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	120	120	120	120	120
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	200	200	200	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,476**	**8,508**	**8,512**	**8,588**	**8,651**	**8,685**	**8,824**	**8,775**	**8,985**	**8,766**	**8,997**	**8,957**	**7,778**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,693	7,951	7,964	8,197	8,358	8,462	8,487	8,809	8,787	8,695	8,661	8,497	7,632	6,743
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,736	4,741	4,738	4,753	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	48	56	47	49	36	41	54	43	40	38	15	15	8	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,876	2,701	2,801	2,726	2,813	2,792	2,657	2,752	2,642	2,841	2,722	2,438	2,336	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,014	1,150	1,109	1,169	1,151	1,189	1,262	1,250	971	947	658	535	288	104
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	572	509	436	413	295	313
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**19,624**	**19,814**	**19,994**	**20,098**	**20,316**	**20,553**	**20,595**	**20,937**	**21,157**	**21,570**	**21,761**	**22,149**	**22,701**	**21,553**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**748**	**768**	**752**	**748**	**755**	**708**	**745**	**720**	**649**	**494**	**450**	**332**	**147**	**646**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,497**	**1,790**	**944**	**978**	**1,015**	**936**	**997**	**1,000**	**964**	**1,043**	**1,096**	**1,218**	**1,302**	**1,451**	**1,716**	**957**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,080**	**19,228**	**19,402**	**19,498**	**19,690**	**19,892**	**19,940**	**20,244**	**20,440**	**20,795**	**20,969**	**21,332**	**21,920**	**20,815**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS Geo 8760*
Future: *CTP*
Sensitivity: *At most one 50MW conventional geothermal, and unlimited 50MW EGS can be selected*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.327	B$
20-Year Carbon Emissions	41.998	M Tons
20-Year Water Consumption	7.312	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	111	17	93	66	94	23	125	-	-	-	-	155	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	35	-	-	127	156	291
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	100	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**237**	**44**	**121**	**90**	**118**	**47**	**151**	**186**	**271**	**170**	**297**	**628**	**909**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS Geo Force 50MW Base & 200MW Deep 8760*
Future: *CTP*
Sensitivity: *50 MW of conventional geothermal and 200 MW of enhanced geothermal forced in.*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.480	B$
20-Year Carbon Emissions	41.616	M Tons
20-Year Water Consumption	22.536	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.68	20.05	20.51	19.56	20.33	19.61	19.28	18.26	14.40	14.40	14.40	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	198	198	197	196	196	195	187	166	142	142	108	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,319	1,344	1,396	1,431	1,447	1,458	1,481	1,461	1,707	1,877	1,941	2,324	3,131
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,316	2,975	1,884	1,937	1,987	2,004	2,042	2,027	2,033	2,020	1,983	1,764	1,528	1,516	1,194	-
Water Consumption	k-gallons	569	610	616	610	647	466	291	767	1,041	1,318	1,598	1,594	1,586	1,583	1,593	1,577	1,564	1,557	1,554	1,397

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,628	2,614	2,600	2,586	2,572	2,515	2,546	2,532	2,745	2,733	2,701	2,841	3,046	2,428
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,255	2,367	2,406	2,406	2,287	2,131
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	580	872	1,164
Geothermal	MW	11	11	11	11	11	11	11	61	111	161	211	211	211	211	211	211	211	211	200	200
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	80	80	80	80	80
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,199**	**8,264**	**8,329**	**8,289**	**8,350**	**8,319**	**8,375**	**8,388**	**8,456**	**8,718**	**8,538**	**8,847**	**8,947**	**7,770**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,544	7,479	7,444	7,405	7,373	7,207	7,295	7,254	7,885	7,797	7,763	8,044	7,594	6,704
Wind	GWh	2,198	2,229	2,197	4,962	4,945	4,974	4,962	4,980	4,955	4,738	4,756	4,737	4,741	4,738	4,752	3,932	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	4,807	7,303	9,516
Geothermal	GWh	60	61	61	61	60	61	61	437	813	1,190	1,571	1,566	1,566	1,566	1,571	1,566	1,566	1,506	1,510	1,506
Gas Steam Generator	GWh	55	80	81	36	68	127	47	63	54	54	42	47	46	31	69	18	7	12	6	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,877	2,714	2,813	2,757	2,850	2,820	2,711	2,838	2,647	2,725	2,612	2,467	2,220	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	985	1,163	1,183	1,252	1,264	1,254	1,338	1,238	1,153	720	466	523	241	24
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	184	303	249	272	181	136
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**19,446**	**19,753**	**20,319**	**20,553**	**20,996**	**20,903**	**21,032**	**20,951**	**21,591**	**21,608**	**21,869**	**21,839**	**22,652**	**21,526**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**839**	**614**	**442**	**394**	**277**	**383**	**367**	**475**	**294**	**282**	**193**	**286**	**101**	**732**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,498**	**1,790**	**868**	**1,090**	**1,345**	**1,369**	**1,551**	**1,415**	**1,396**	**1,225**	**1,538**	**1,441**	**1,550**	**1,402**	**1,888**	**1,286**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,313**	**18,913**	**19,494**	**20,042**	**20,285**	**20,721**	**20,632**	**20,749**	**20,671**	**21,237**	**21,230**	**21,472**	**21,328**	**22,138**	**21,059**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS Geo Force 50MW Base & 200MW Deep 8760*
Future: *CTP*
Sensitivity: *50 MW of conventional geothermal and 200 MW of enhanced geothermal forced in.*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.480	B$
20-Year Carbon Emissions	41.616	M Tons
20-Year Water Consumption	22.536	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	23	-	-	-	-	-	44	-	227	-	-	152	300	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	5	112	38	-	151	294
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	-	292	292
Geothermal	MW	-	-	-	-	-	-	-	100	50	50	50	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**48**	**126**	**77**	**77**	**74**	**25**	**69**	**26**	**303**	**323**	**208**	**375**	**768**	**912**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS Geo Force Base 8760*
Future: *CTP*
Sensitivity: *50 MW of conventional geothermal forced in*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.350	B$
20-Year Carbon Emissions	41.713	M Tons
20-Year Water Consumption	9.955	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.78	19.04	18.43	16.68	16.55	16.04	15.67	14.83	14.40	14.55	14.40	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	198	198	197	197	196	196	182	197	168	146	114	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,300	1,307	1,346	1,362	1,387	1,398	1,429	1,498	1,718	1,875	1,964	2,347	3,172
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,316	2,975	1,899	1,906	1,912	1,918	1,935	1,959	1,956	1,984	1,953	2,036	1,756	1,550	1,251	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	489	487	487	489	489	483	483	496	504	485	474	468	314

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,669	2,655	2,641	2,725	2,782	2,835	2,842	2,953	2,938	2,926	2,895	2,883	3,051	2,433
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,260	2,260	2,278	2,427	2,303	2,145
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	80	80	80	80	80
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	200	200	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,241**	**8,256**	**8,270**	**8,278**	**8,360**	**8,438**	**8,471**	**8,609**	**8,600**	**8,804**	**8,604**	**8,857**	**8,914**	**7,735**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,665	7,600	7,564	7,810	7,984	8,133	8,155	8,474	8,442	8,362	8,328	8,167	7,609	6,719
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,955	4,738	4,756	4,737	4,741	4,738	4,752	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	3,549	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	48	58	48	48	38	42	51	42	63	45	17	16	7	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,875	2,709	2,809	2,731	2,821	2,802	2,670	2,764	2,602	2,861	2,747	2,476	2,279	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,009	1,126	1,078	1,145	1,123	1,169	1,243	1,230	1,150	999	693	562	280	101
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	179	350	302	281	195	221
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**19,590**	**19,451**	**19,572**	**19,690**	**19,924**	**20,217**	**20,254**	**20,594**	**21,817**	**21,157**	**21,354**	**21,754**	**22,513**	**21,433**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**765**	**780**	**801**	**785**	**770**	**708**	**748**	**719**	**287**	**518**	**463**	**332**	**125**	**603**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,498**	**1,790**	**930**	**951**	**958**	**886**	**948**	**995**	**950**	**1,034**	**1,717**	**1,145**	**1,226**	**1,369**	**1,773**	**1,056**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,313**	**19,048**	**19,188**	**19,296**	**19,412**	**19,625**	**19,887**	**19,923**	**20,235**	**21,423**	**20,698**	**20,879**	**21,250**	**21,999**	**20,957**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS Geo Force Base 8760*
Future: *CTP*
Sensitivity: *50 MW of conventional geothermal forced in*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.350	B$
20-Year Carbon Emissions	41.713	M Tons
20-Year Water Consumption	9.955	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	64	-	-	98	70	110	21	125	-	-	-	-	262	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	10	-	19	148	147	292
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	-	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	50	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**90**	**76**	**27**	**125**	**95**	**134**	**46**	**151**	**226**	**265**	**188**	**318**	**726**	**909**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS Geo Force Deep 8760*
Future: *CTP*
Sensitivity: *50 MW of enhanced geothermal forced in*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.332	B$
20-Year Carbon Emissions	41.716	M Tons
20-Year Water Consumption	10.920	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.78	19.04	18.42	16.64	16.54	16.01	15.64	14.80	14.40	14.55	14.40	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	198	198	197	197	196	196	182	196	168	146	112	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,297	1,304	1,342	1,359	1,383	1,394	1,425	1,495	1,715	1,873	1,961	2,346	3,170
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,315	2,975	1,897	1,917	1,923	1,924	1,944	1,956	1,954	1,983	1,949	2,032	1,753	1,551	1,235	-
Water Consumption	k-gallons	569	610	616	610	647	466	292	564	563	561	563	562	559	557	569	578	561	548	539	387

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,666	2,652	2,638	2,709	2,773	2,791	2,801	2,915	2,900	2,888	2,857	2,845	3,040	2,422
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,263	2,263	2,282	2,430	2,306	2,150
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	61	61	61	61	61	61	61	61	61	61	61	50	50
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	80	80	80	80	80
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	200	200	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,237**	**8,302**	**8,316**	**8,312**	**8,402**	**8,445**	**8,480**	**8,621**	**8,616**	**8,820**	**8,620**	**8,872**	**8,956**	**7,779**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,654	7,589	7,553	7,763	7,959	8,007	8,035	8,364	8,333	8,252	8,218	8,058	7,577	6,687
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,955	4,738	4,756	4,737	4,741	4,738	4,752	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	3,549	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	437	436	437	438	437	436	437	438	437	436	377	378	376
Gas Steam Generator	GWh	55	80	81	36	68	127	48	58	49	49	39	42	51	41	61	45	17	16	7	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,875	2,708	2,805	2,728	2,818	2,803	2,670	2,769	2,606	2,860	2,747	2,481	2,265	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,007	1,144	1,096	1,156	1,139	1,165	1,240	1,227	1,147	997	687	561	269	91
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	172	345	302	279	187	214
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**19,577**	**19,833**	**19,952**	**20,029**	**20,290**	**20,464**	**20,508**	**20,860**	**22,079**	**21,415**	**21,615**	**22,023**	**22,826**	**21,761**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**771**	**724**	**751**	**755**	**730**	**715**	**749**	**714**	**280**	**515**	**453**	**321**	**119**	**585**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,498**	**1,790**	**923**	**999**	**1,014**	**920**	**996**	**982**	**939**	**1,024**	**1,699**	**1,139**	**1,218**	**1,364**	**1,805**	**1,092**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,036**	**19,293**	**19,402**	**19,476**	**19,713**	**19,866**	**19,911**	**20,231**	**21,412**	**20,696**	**20,881**	**21,256**	**22,037**	**21,010**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS Geo Force Deep 8760*
Future: *CTP*
Sensitivity: *50 MW of enhanced geothermal forced in*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.332	B$
20-Year Carbon Emissions	41.716	M Tons
20-Year Water Consumption	10.920	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	61	-	-	85	78	75	23	128	-	-	-	-	290	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	13	-	19	148	146	294
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	-	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	50	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**86**	**76**	**27**	**113**	**103**	**99**	**48**	**154**	**230**	**265**	**188**	**318**	**753**	**911**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS Geo+DER+ITC+SMR+no H2&CCS 8760*
Future: *CTP*
Sensitivity: *Follow stakeholder scenarios #2 (updated geothermal cost) and #7 (High BTM solar+TOU+High Battery DLC, etc.); add in ITC assumptions (2026-2033: 30%, 2034: 22.5%, 2035: 15%, 2036-2045: 0) for both geothermal and SMRs; move new SMR first year available date to 2040; remove hydrogen conversion and CCS from project options*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.763	B$
20-Year Carbon Emissions	41.639	M Tons
20-Year Water Consumption	32.241	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,287	2,514	2,762	3,250	3,315	3,343	3,335	3,398	3,421	3,477	3,488	3,508	3,524	3,561	3,557	3,557	3,543	3,564	3,610	3,673
PRM	%	15.31	15.75	20.42	20.43	19.09	20.72	22.06	28.65	28.82	27.38	27.95	28.09	28.46	28.11	23.18	18.06	14.52	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	391	369	313	336	294	199	179	180	187	185	189	183	191	177	184	178	145	135	-
Revenue Requirement	M$	523	572	690	1,191	1,204	1,286	1,272	1,341	1,330	1,341	1,352	1,367	1,380	1,401	1,355	1,451	1,523	1,632	2,012	2,836
Carbon Emission	k-tons	2,598	2,902	2,875	2,988	3,306	2,959	1,860	1,897	1,918	1,993	1,967	2,012	1,929	2,028	1,856	1,865	1,790	1,499	1,399	-
Water Consumption	k-gallons	569	608	612	609	646	461	288	2,203	2,203	2,210	2,216	2,214	2,200	2,206	2,205	2,207	2,197	2,176	2,178	2,032

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,429	2,435	2,571	2,557	2,543	2,529	2,515	2,501	2,444	2,431	2,417	2,402	2,473	2,542	2,623	2,796	1,878
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,104	1,150	900	1,061
Demand Response	MW	70	70	70	70	51	71	92	113	133	153	174	194	215	236	256	276	297	318	338	361
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,364	2,193	1,948
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	1,310
Geothermal	MW	11	11	11	11	11	11	11	361	361	361	361	361	361	361	361	361	361	361	350	350
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,798**	**7,827**	**8,349**	**8,181**	**8,563**	**8,597**	**8,526**	**8,557**	**8,546**	**8,578**	**8,611**	**8,425**	**8,492**	**8,300**	**8,678**	**8,768**	**7,485**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,825	6,961	7,358	7,337	7,271	7,235	7,196	7,166	6,998	6,959	6,918	6,892	7,046	7,303	7,401	6,873	5,101
Wind	GWh	2,198	2,229	2,197	4,962	4,945	4,974	4,962	4,981	4,956	4,738	4,756	4,737	4,741	4,738	4,753	3,933	3,748	3,688	3,102	3,643
Demand Response	GWh	29	29	29	29	17	22	27	32	37	41	47	51	56	61	66	71	76	81	86	91
Coal	GWh	1,090	1,073	1,103	1,137	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	2,342	2,254	3,570	4,822	10,753
Geothermal	GWh	60	61	61	61	60	61	61	2,696	2,695	2,696	2,704	2,696	2,695	2,696	2,704	2,696	2,695	2,635	2,643	2,635
Gas Steam Generator	GWh	55	80	80	35	66	119	43	38	31	38	29	34	24	24	36	27	18	9	8	-
Gas Combined Cycle	GWh	2,601	2,807	2,665	2,808	2,847	2,997	2,870	2,641	2,708	2,717	2,818	2,823	2,679	2,827	2,649	2,823	2,817	2,515	2,462	-
Gas/Hydrogen Turbine	GWh	524	860	882	982	1,372	1,880	956	1,182	1,174	1,283	1,183	1,247	1,226	1,274	1,118	1,020	917	666	532	-
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Generation	**GWh**	**13,894**	**15,152**	**16,004**	**19,592**	**20,178**	**20,682**	**19,201**	**21,729**	**21,864**	**21,836**	**21,811**	**21,826**	**21,681**	**21,789**	**21,514**	**20,891**	**20,708**	**21,394**	**21,336**	**23,082**
Market Purchases	**GWh**	**40**	**119**	**309**	**292**	**267**	**232**	**865**	**40**	**41**	**40**	**66**	**82**	**131**	**163**	**240**	**499**	**604**	**394**	**418**	**124**
Market Sales	**GWh**	**2,209**	**1,890**	**1,462**	**1,354**	**1,501**	**1,803**	**850**	**2,391**	**2,416**	**2,251**	**2,132**	**2,035**	**1,845**	**1,804**	**1,544**	**1,117**	**997**	**1,337**	**1,165**	**2,358**
Net Generation *	**GWh**	**13,636**	**14,842**	**15,572**	**19,097**	**19,692**	**20,152**	**18,673**	**21,154**	**21,280**	**21,265**	**21,234**	**21,251**	**21,112**	**21,221**	**20,934**	**20,307**	**20,108**	**20,736**	**20,662**	**22,287**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS Geo+DER+ITC+SMR+no H2&CCS 8760*
Future: *CTP*
Sensitivity: *Follow stakeholder scenarios #2 (updated geothermal cost) and #7 (High BTM solar+TOU+High Battery DLC, etc.); add in ITC assumptions (2026-2033: 30%, 2034: 22.5%, 2035: 15%, 2036-2045: 0) for both geothermal and SMRs; move new SMR first year available date to 2040; remove hydrogen conversion and CCS from project options*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.763	B$
20-Year Carbon Emissions	41.639	M Tons
20-Year Water Consumption	32.241	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	111	20	150	-	-	-	-	-	-	-	-	-	83	100	92	268	-
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	54	47	-	161
Demand Response	MW	-	-	-	-	359	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	-	-	114	99	205
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	730
Geothermal	MW	-	-	-	-	-	-	-	350	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	(212)
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,393**	**379**	**515**	**25**	**376**	**27**	**26**	**24**	**25**	**25**	**26**	**26**	**108**	**177**	**423**	**738**	**911**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS Geo+DER+ITC+SMR+no H2&CCS+no 29Gas 8760*
Future: *CTP*
Sensitivity: *Follow stakeholder scenarios #2 and #7; add in ITC assumptions for both geothermal and SMRs; move new SMR first year available date to 2040; remove hydrogen conversion and CCS from project options; remove172 MW gas unit added in 2029*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.528	B$
20-Year Carbon Emissions	40.256	M Tons
20-Year Water Consumption	32.467	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,287	2,514	2,762	3,250	3,315	3,343	3,335	3,398	3,421	3,477	3,488	3,508	3,524	3,561	3,557	3,557	3,543	3,564	3,610	3,673
PRM	%	15.31	15.75	20.42	15.24	14.40	15.96	17.29	23.96	24.17	22.80	23.39	23.56	23.95	23.64	18.75	14.40	14.51	15.68	14.40	14.60
Carbon Intensity	lbs/MWh	381	391	369	310	328	285	199	177	177	184	182	187	180	188	172	166	143	124	117	-
Revenue Requirement	M$	523	572	690	1,140	1,160	1,244	1,227	1,297	1,288	1,300	1,312	1,328	1,342	1,365	1,322	1,440	1,607	1,728	2,072	2,782
Carbon Emission	k-tons	2,598	2,902	2,875	2,948	3,209	2,845	1,866	1,873	1,881	1,946	1,925	1,979	1,899	1,991	1,788	1,700	1,482	1,309	1,240	-
Water Consumption	k-gallons	569	608	612	626	662	493	309	2,220	2,221	2,229	2,229	2,232	2,214	2,219	2,237	2,212	2,187	2,174	2,182	2,032

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,430	2,458	2,594	2,580	2,566	2,552	2,538	2,524	2,467	2,454	2,440	2,425	2,647	2,615	2,604	2,788	1,875
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	1,062
Demand Response	MW	70	70	70	70	51	71	92	113	133	153	174	194	215	236	258	280	301	322	343	363
Short Duration Storage	MW	992	1,160	1,640	1,950	1,973	2,273	2,273	2,273	2,273	2,273	2,273	2,273	2,273	2,273	2,273	2,318	2,318	2,318	2,263	1,947
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,310
Geothermal	MW	11	11	11	11	11	11	11	361	361	361	361	361	361	361	361	361	361	361	350	350
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	442	442	482	482	482	482	482	482	482	482	482	315	315	315	315	315	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	200	200
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,627**	**7,702**	**8,223**	**8,055**	**8,438**	**8,471**	**8,400**	**8,432**	**8,420**	**8,452**	**8,485**	**8,301**	**8,564**	**8,366**	**8,590**	**8,708**	**7,484**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,827	7,028	7,425	7,404	7,338	7,302	7,263	7,233	7,064	7,026	6,985	6,959	7,546	7,512	7,344	6,849	5,093
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,981	4,956	4,737	4,757	4,737	4,741	4,738	4,753	3,933	3,564	3,344	2,756	3,647
Demand Response	GWh	29	29	29	29	17	22	27	32	37	41	47	51	56	61	66	71	76	81	87	91
Coal	GWh	1,090	1,073	1,103	1,136	1,170	394	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	2,342	3,491	4,807	6,063	10,753
Geothermal	GWh	60	61	61	61	60	61	61	2,696	2,695	2,696	2,704	2,696	2,695	2,696	2,704	2,696	2,695	2,635	2,643	2,635
Gas Steam Generator	GWh	55	80	80	75	105	193	78	79	72	81	59	75	55	53	109	63	14	7	8	-
Gas Combined Cycle	GWh	2,601	2,807	2,665	2,808	2,837	2,985	2,901	2,630	2,696	2,705	2,805	2,813	2,671	2,814	2,636	2,747	2,635	2,393	2,372	-
Gas/Hydrogen Turbine	GWh	524	860	882	847	1,145	1,587	888	1,075	1,049	1,136	1,059	1,119	1,113	1,153	913	751	540	435	332	-
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Generation	**GWh**	**13,894**	**15,152**	**16,004**	**19,498**	**20,046**	**20,516**	**19,267**	**21,719**	**21,834**	**21,786**	**21,771**	**21,795**	**21,658**	**21,752**	**21,436**	**21,083**	**21,409**	**21,876**	**21,918**	**23,078**
Market Purchases	**GWh**	**40**	**119**	**309**	**321**	**288**	**260**	**824**	**40**	**44**	**44**	**69**	**93**	**132**	**172**	**268**	**470**	**325**	**236**	**208**	**124**
Market Sales	**GWh**	**2,209**	**1,890**	**1,462**	**1,281**	**1,377**	**1,644**	**861**	**2,363**	**2,369**	**2,184**	**2,078**	**1,996**	**1,803**	**1,755**	**1,468**	**1,216**	**1,354**	**1,578**	**1,491**	**2,355**
Net Generation *	**GWh**	**13,636**	**14,842**	**15,572**	**18,996**	**19,547**	**19,965**	**18,724**	**21,126**	**21,231**	**21,194**	**21,176**	**21,201**	**21,069**	**21,162**	**20,830**	**20,435**	**20,743**	**21,136**	**21,197**	**22,284**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS Geo+DER+ITC+SMR+no H2&CCS+no 29Gas 8760*
Future: *CTP*
Sensitivity: *Follow stakeholder scenarios #2 and #7; add in ITC assumptions for both geothermal and SMRs; move new SMR first year available date to 2040; remove hydrogen conversion and CCS from project options; remove172 MW gas unit added in 2029*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.528	B$
20-Year Carbon Emissions	40.256	M Tons
20-Year Water Consumption	32.467	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	112	42	150	-	-	-	-	-	-	-	-	-	233	-	-	280	5
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	262
Demand Response	MW	-	-	-	-	359	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	23	300	-	-	-	-	-	-	-	-	-	45	-	-	215	133
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	584
Geothermal	MW	-	-	-	-	-	-	-	350	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	-	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	(40)
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	100	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,222**	**424**	**515**	**25**	**376**	**27**	**26**	**24**	**25**	**25**	**26**	**31**	**303**	**170**	**270**	**766**	**970**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS High BTMS 8760*
Future: *CTP*
Sensitivity: *Change the behind-the-meter solar forecast from Reference to High*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.167	B$
20-Year Carbon Emissions	41.594	M Tons
20-Year Water Consumption	7.273	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,287	2,514	2,762	3,250	3,308	3,338	3,340	3,412	3,447	3,510	3,532	3,563	3,590	3,643	3,658	3,678	3,674	3,680	3,709	3,769
PRM	%	15.32	15.75	20.42	20.44	19.01	20.22	21.07	22.07	21.57	19.90	19.85	19.44	19.17	18.17	14.63	14.40	14.40	14.49	14.40	14.60
Carbon Intensity	lbs/MWh	381	391	369	313	336	294	199	199	199	198	198	198	197	197	197	197	169	147	119	-
Revenue Requirement	M$	523	571	690	1,191	1,196	1,279	1,263	1,304	1,308	1,344	1,358	1,381	1,390	1,420	1,403	1,636	1,814	1,904	2,282	3,106
Carbon Emission	k-tons	2,599	2,902	2,875	2,988	3,312	2,962	1,888	1,885	1,895	1,908	1,926	1,946	1,941	1,968	1,987	2,024	1,750	1,546	1,293	-
Water Consumption	k-gallons	569	608	612	609	646	464	291	284	285	285	284	285	282	280	276	294	279	264	266	111

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,431	2,446	2,582	2,639	2,690	2,686	2,791	2,850	2,896	2,893	3,002	2,988	2,976	2,944	2,933	2,993	2,375
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,349	2,412	2,554	2,445	2,248
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	120	120	120	120	120
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,800**	**7,819**	**8,323**	**8,210**	**8,391**	**8,415**	**8,444**	**8,529**	**8,599**	**8,622**	**8,758**	**8,634**	**8,883**	**8,727**	**8,973**	**8,937**	**7,720**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,829	6,992	7,389	7,575	7,702	7,694	8,001	8,185	8,309	8,304	8,617	8,594	8,502	8,468	8,300	7,437	6,544
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,955	4,738	4,756	4,737	4,741	4,738	4,752	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,103	1,136	1,170	394	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	80	35	68	126	47	52	45	48	36	40	51	41	50	36	13	12	7	-
Gas Combined Cycle	GWh	2,601	2,807	2,665	2,808	2,844	2,993	2,865	2,696	2,791	2,718	2,800	2,776	2,643	2,737	2,635	2,810	2,694	2,426	2,307	-
Gas/Hydrogen Turbine	GWh	524	861	882	982	1,382	1,883	1,000	1,111	1,069	1,139	1,128	1,172	1,239	1,227	1,051	917	632	506	263	93
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	385	505	429	404	284	293
Total Generation	**GWh**	**13,894**	**15,152**	**16,004**	**19,594**	**20,214**	**20,714**	**19,480**	**19,518**	**19,670**	**19,861**	**20,105**	**20,368**	**20,372**	**20,705**	**20,858**	**21,310**	**21,505**	**21,899**	**22,441**	**21,323**
Market Purchases	**GWh**	**40**	**119**	**309**	**292**	**265**	**231**	**742**	**820**	**814**	**761**	**751**	**683**	**731**	**707**	**665**	**475**	**411**	**296**	**134**	**604**
Market Sales	**GWh**	**2,209**	**1,889**	**1,461**	**1,355**	**1,503**	**1,798**	**952**	**919**	**956**	**927**	**1,014**	**1,040**	**996**	**1,083**	**1,120**	**1,293**	**1,381**	**1,558**	**1,853**	**1,132**
Net Generation *	**GWh**	**13,636**	**14,843**	**15,573**	**19,100**	**19,726**	**20,180**	**18,931**	**18,937**	**19,084**	**19,258**	**19,470**	**19,696**	**19,706**	**20,000**	**20,132**	**20,556**	**20,733**	**21,107**	**21,687**	**20,636**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS High BTMS 8760*
Future: *CTP*
Sensitivity: *Change the behind-the-meter solar forecast from Reference to High*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.167	B$
20-Year Carbon Emissions	41.594	M Tons
20-Year Water Consumption	7.273	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	113	29	150	71	66	10	119	74	102	11	122	-	-	-	-	155	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	99	63	142	160	254
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,395**	**75**	**515**	**96**	**192**	**36**	**146**	**98**	**126**	**36**	**148**	**111**	**310**	**232**	**312**	**633**	**871**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS High BTMS+TOU 8760*
Future: *CTP*
Sensitivity: *Change the behind-the-meter solar forecast from Reference to High with TOU Forecast*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.045	B$
20-Year Carbon Emissions	41.439	M Tons
20-Year Water Consumption	7.301	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,287	2,514	2,762	3,250	3,315	3,343	3,335	3,398	3,421	3,477	3,488	3,508	3,524	3,561	3,557	3,557	3,543	3,564	3,610	3,673
PRM	%	15.31	15.75	20.42	20.43	18.13	19.39	20.49	21.85	21.70	20.22	20.54	20.52	20.60	20.09	15.96	14.40	14.40	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	391	369	313	336	294	199	199	199	198	198	198	197	197	197	195	166	145	118	-
Revenue Requirement	M$	523	572	690	1,191	1,189	1,271	1,256	1,298	1,302	1,338	1,352	1,374	1,383	1,413	1,377	1,566	1,737	1,838	2,230	3,168
Carbon Emission	k-tons	2,598	2,902	2,875	2,988	3,310	2,964	1,880	1,889	1,896	1,902	1,922	1,942	1,937	1,966	1,978	1,982	1,706	1,527	1,276	-
Water Consumption	k-gallons	568	608	612	609	646	464	291	284	285	284	284	285	282	279	284	302	284	267	268	114

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,429	2,439	2,574	2,627	2,709	2,700	2,784	2,851	2,895	2,894	3,008	2,993	2,981	2,950	2,938	2,997	2,379
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	-	-	-	-	-	0	0	1	1	1	3	5	6	6	6	6
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,251	2,277	2,355	2,300	2,161
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40	40	80	80	80
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,798**	**7,780**	**8,281**	**8,158**	**8,367**	**8,385**	**8,392**	**8,484**	**8,553**	**8,577**	**8,718**	**8,554**	**8,665**	**8,472**	**8,694**	**8,711**	**7,551**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,825	6,971	7,368	7,540	7,757	7,735	7,980	8,186	8,308	8,305	8,634	8,609	8,518	8,483	8,305	7,441	6,551
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,955	4,738	4,756	4,736	4,741	4,738	4,753	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0
Coal	GWh	1,090	1,073	1,103	1,137	1,170	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	80	35	67	124	47	53	45	48	36	40	51	41	65	52	25	18	8	-
Gas Combined Cycle	GWh	2,600	2,807	2,665	2,808	2,845	2,995	2,864	2,692	2,791	2,717	2,799	2,775	2,642	2,734	2,644	2,798	2,674	2,385	2,285	-
Gas/Hydrogen Turbine	GWh	524	860	882	982	1,378	1,884	989	1,117	1,069	1,129	1,123	1,166	1,234	1,225	1,150	1,085	770	586	315	147
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	193	158	144	281	201	233
Total Generation	**GWh**	**13,893**	**15,152**	**16,004**	**19,592**	**20,176**	**20,678**	**19,408**	**19,548**	**19,683**	**19,799**	**20,068**	**20,326**	**20,334**	**20,684**	**20,770**	**21,117**	**21,329**	**21,794**	**22,358**	**21,290**
Market Purchases	**GWh**	**41**	**119**	**309**	**292**	**266**	**232**	**759**	**791**	**792**	**768**	**746**	**681**	**726**	**695**	**686**	**554**	**513**	**361**	**153**	**602**
Market Sales	**GWh**	**2,208**	**1,890**	**1,462**	**1,354**	**1,501**	**1,799**	**937**	**954**	**983**	**915**	**1,015**	**1,039**	**997**	**1,096**	**1,102**	**1,240**	**1,362**	**1,578**	**1,843**	**1,158**
Net Generation *	**GWh**	**13,635**	**14,842**	**15,572**	**19,097**	**19,691**	**20,149**	**18,866**	**18,965**	**19,096**	**19,201**	**19,436**	**19,656**	**19,669**	**19,980**	**20,046**	**20,375**	**20,563**	**21,011**	**21,605**	**20,610**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS High BTMS+TOU 8760*
Future: *CTP*
Sensitivity: *Change the behind-the-meter solar forecast from Reference to High with TOU Forecast*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.045	B$
20-Year Carbon Emissions	41.439	M Tons
20-Year Water Consumption	7.301	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	111	24	150	66	97	5	98	81	100	13	128	-	-	-	-	153	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	-	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	1	26	78	215	311
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	-	-	40	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,393**	**24**	**515**	**91**	**223**	**32**	**125**	**106**	**125**	**38**	**154**	**71**	**172**	**196**	**287**	**686**	**929**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS High BTMS+TOU+125% PS 8760*
Future: *CTP*
Sensitivity: *Change the behind-the-meter solar forecast from Reference to High with TOU Forecast, 125% Power Saver Program*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.094	B$
20-Year Carbon Emissions	41.503	M Tons
20-Year Water Consumption	7.288	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,287	2,514	2,762	3,250	3,315	3,343	3,335	3,398	3,421	3,477	3,488	3,508	3,524	3,561	3,557	3,557	3,543	3,564	3,610	3,673
PRM	%	15.31	15.75	20.42	20.43	19.68	20.94	22.08	20.83	20.71	19.29	19.61	19.59	19.67	19.16	15.03	14.56	14.40	14.50	14.50	14.60
Carbon Intensity	lbs/MWh	381	391	369	313	335	293	199	199	198	198	198	197	197	196	197	195	167	144	120	-
Revenue Requirement	M$	523	572	690	1,191	1,204	1,287	1,273	1,281	1,290	1,328	1,345	1,370	1,380	1,413	1,378	1,589	1,758	1,867	2,257	3,201
Carbon Emission	k-tons	2,598	2,902	2,875	2,988	3,304	2,958	1,883	1,880	1,890	1,905	1,928	1,947	1,943	1,971	1,983	2,002	1,735	1,516	1,298	-
Water Consumption	k-gallons	569	608	612	609	645	463	290	283	283	284	284	284	281	279	287	297	279	266	271	116

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,429	2,439	2,574	2,627	2,679	2,676	2,787	2,861	2,904	2,906	3,018	3,003	2,991	2,960	2,948	2,959	2,341
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	82	84	85	86	86	86	86	86	86	86	88	90	91	91	91	91
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,270	2,270	2,270	2,270	2,270	2,270	2,270	2,270	2,270	2,277	2,476	2,206	2,068
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	80	80	80	80	80
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,798**	**7,862**	**8,364**	**8,244**	**8,343**	**8,367**	**8,401**	**8,500**	**8,567**	**8,594**	**8,732**	**8,568**	**8,718**	**8,507**	**8,810**	**8,664**	**7,506**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,825	6,971	7,368	7,540	7,670	7,666	7,989	8,214	8,333	8,339	8,660	8,633	8,543	8,502	8,326	7,328	6,439
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,736	4,741	4,737	4,752	3,932	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	17	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18
Coal	GWh	1,090	1,073	1,103	1,137	1,170	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	80	35	64	122	45	52	43	47	37	40	50	42	69	45	19	17	9	-
Gas Combined Cycle	GWh	2,601	2,807	2,665	2,808	2,845	2,994	2,867	2,695	2,787	2,710	2,796	2,776	2,638	2,731	2,637	2,786	2,664	2,394	2,303	-
Gas/Hydrogen Turbine	GWh	524	860	882	982	1,372	1,877	993	1,103	1,066	1,139	1,132	1,173	1,246	1,234	1,159	1,007	726	570	334	163
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	191	338	289	273	206	243
Total Generation	**GWh**	**13,894**	**15,152**	**16,004**	**19,592**	**20,184**	**20,686**	**19,432**	**19,467**	**19,622**	**19,830**	**20,122**	**20,377**	**20,393**	**20,734**	**20,815**	**21,242**	**21,452**	**21,816**	**22,307**	**21,222**
Market Purchases	**GWh**	**40**	**119**	**309**	**292**	**265**	**231**	**747**	**823**	**821**	**756**	**732**	**670**	**709**	**685**	**680**	**514**	**473**	**342**	**176**	**618**
Market Sales	**GWh**	**2,209**	**1,890**	**1,462**	**1,354**	**1,505**	**1,804**	**946**	**933**	**968**	**946**	**1,070**	**1,119**	**1,066**	**1,179**	**1,192**	**1,374**	**1,504**	**1,634**	**1,815**	**1,122**
Net Generation *	**GWh**	**13,636**	**14,842**	**15,572**	**19,097**	**19,697**	**20,154**	**18,886**	**18,913**	**19,052**	**19,244**	**19,505**	**19,746**	**19,756**	**20,073**	**20,142**	**20,549**	**20,744**	**21,085**	**21,554**	**20,558**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS High BTMS+TOU+125% PS 8760*
Future: *CTP*
Sensitivity: *Change the behind-the-meter solar forecast from Reference to High with TOU Forecast, 125% Power Saver Program*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.094	B$
20-Year Carbon Emissions	41.503	M Tons
20-Year Water Consumption	7.288	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	111	24	150	66	67	11	124	88	100	16	126	-	-	-	-	106	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	85	-	-	-	-	-	-	-	-	-	6	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	20	-	-	-	-	-	-	-	-	7	199	-	312
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,393**	**108**	**515**	**91**	**113**	**38**	**150**	**112**	**124**	**40**	**152**	**72**	**211**	**177**	**369**	**523**	**930**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS High BTMS+TOU+125% PS+50% Battery 8760*
Future: *CTP*
Sensitivity: *Change the behind-the-meter solar forecast from Reference to High with TOU Forecast, 125% Power Saver Program, 50% BTM Battery*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.993	B$
20-Year Carbon Emissions	41.883	M Tons
20-Year Water Consumption	7.305	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,287	2,514	2,762	3,250	3,315	3,343	3,335	3,398	3,421	3,477	3,488	3,508	3,524	3,561	3,557	3,557	3,543	3,564	3,610	3,673
PRM	%	15.31	15.75	20.42	20.43	20.07	21.72	23.26	22.16	22.41	21.34	22.14	22.51	22.94	22.78	17.88	16.65	14.40	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	391	369	313	335	293	199	199	198	198	197	197	196	196	197	188	187	164	141	-
Revenue Requirement	M$	523	572	690	1,191	1,215	1,298	1,285	1,290	1,298	1,337	1,354	1,380	1,391	1,424	1,373	1,565	1,669	1,761	2,139	3,034
Carbon Emission	k-tons	2,598	2,902	2,875	2,988	3,301	2,953	1,885	1,880	1,889	1,899	1,922	1,943	1,939	1,972	1,985	1,922	1,878	1,680	1,474	-
Water Consumption	k-gallons	569	608	612	609	644	461	291	282	283	282	281	281	274	271	295	296	292	273	283	119

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,429	2,439	2,574	2,627	2,625	2,611	2,669	2,743	2,787	2,786	2,914	2,918	2,906	2,967	2,955	2,891	2,219
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,496	1,504	1,431	1,431	1,431	1,431	1,431	1,431	1,431	1,125	1,125	875	875
Demand Response	MW	70	70	70	70	103	125	147	169	190	209	230	250	271	292	312	332	353	374	394	417
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,427	2,464	2,398	1,948
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	434	580	872	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,798**	**7,883**	**8,406**	**8,306**	**8,390**	**8,432**	**8,462**	**8,580**	**8,669**	**8,714**	**8,888**	**8,722**	**8,851**	**8,775**	**8,977**	**8,881**	**7,524**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,825	6,971	7,368	7,540	7,513	7,476	7,648	7,870	7,993	7,993	8,358	8,387	8,298	8,534	8,361	7,146	6,068
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	5,111	5,114	4,994	5,013	4,993	4,997	4,994	5,009	4,189	3,821	3,600	3,013	3,003
Demand Response	GWh	29	29	29	29	22	28	33	38	43	48	53	58	63	67	72	77	82	87	92	97
Coal	GWh	1,090	1,073	1,103	1,137	1,170	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	3,491	4,807	7,303	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	80	35	63	117	44	48	40	41	28	31	30	19	81	41	33	19	10	-
Gas Combined Cycle	GWh	2,601	2,807	2,665	2,808	2,845	2,994	2,871	2,699	2,797	2,725	2,812	2,796	2,661	2,750	2,651	2,783	2,792	2,530	2,559	-
Gas/Hydrogen Turbine	GWh	524	860	882	982	1,369	1,875	995	1,103	1,061	1,127	1,121	1,162	1,246	1,248	1,274	1,126	1,061	823	491	217
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	160	136	160
Total Generation	**GWh**	**13,894**	**15,152**	**16,004**	**19,592**	**20,186**	**20,689**	**19,451**	**19,462**	**19,619**	**19,770**	**20,068**	**20,333**	**20,351**	**20,748**	**20,831**	**21,087**	**20,755**	**21,217**	**21,558**	**21,156**
Market Purchases	**GWh**	**40**	**119**	**309**	**292**	**265**	**231**	**737**	**818**	**807**	**765**	**719**	**659**	**692**	**641**	**640**	**560**	**719**	**588**	**353**	**617**
Market Sales	**GWh**	**2,209**	**1,890**	**1,462**	**1,354**	**1,506**	**1,808**	**956**	**936**	**968**	**924**	**1,032**	**1,082**	**1,032**	**1,166**	**1,181**	**1,283**	**1,060**	**1,305**	**1,346**	**1,181**
Net Generation *	**GWh**	**13,636**	**14,842**	**15,572**	**19,097**	**19,699**	**20,158**	**18,907**	**18,920**	**19,065**	**19,213**	**19,480**	**19,721**	**19,738**	**20,104**	**20,172**	**20,412**	**20,055**	**20,510**	**20,908**	**20,617**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS High BTMS+TOU+125% PS+50% Battery 8760*
Future: *CTP*
Sensitivity: *Change the behind-the-meter solar forecast from Reference to High with TOU Forecast, 125% Power Saver Program, 50% BTM Battery*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.993	B$
20-Year Carbon Emissions	41.883	M Tons
20-Year Water Consumption	7.305	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	111	24	150	66	13	-	72	87	100	13	141	19	-	92	-	31	246
Wind	MW	-	-	-	800	-	-	-	38	8	29	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	414	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	-	177	37	204	-
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	-	146	292	438
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,393**	**437**	**515**	**91**	**78**	**35**	**126**	**112**	**125**	**38**	**167**	**46**	**171**	**293**	**247**	**552**	**711**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS NGH 8760*
Future: *CTP*
Sensitivity: *Use the high natural gas price assumption in CTP*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	15.355	B$
20-Year Carbon Emissions	31.825	M Tons
20-Year Water Consumption	6.242	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.55	18.00	19.27	20.15	22.78	22.20	20.25	19.97	19.36	18.95	17.95	16.38	14.40	14.40	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	375	353	328	265	273	209	178	173	166	163	162	161	154	157	114	100	83	72	73	-
Revenue Requirement	M$	532	632	760	1,269	1,295	1,399	1,361	1,440	1,449	1,484	1,498	1,523	1,538	1,573	1,603	1,792	1,954	2,035	2,379	3,103
Carbon Emission	k-tons	2,532	2,494	2,412	2,426	2,567	2,031	1,717	1,683	1,625	1,602	1,600	1,586	1,503	1,540	1,147	1,000	847	761	753	-
Water Consumption	k-gallons	560	554	553	550	572	363	267	257	251	247	248	248	235	237	212	205	194	188	193	109

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,537	2,595	2,884	2,913	3,047	3,088	3,176	3,162	3,143	3,130	3,116	3,101	3,089	3,058	3,046	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	45	46	46	48	50	51	51	51	51
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,429	2,429	2,429	2,429	2,429	2,429	2,429	2,429	2,429	2,465	2,491	2,462	2,248
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	872	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	160	160
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,906**	**7,969**	**8,625**	**8,484**	**8,927**	**8,996**	**9,008**	**9,019**	**9,025**	**9,037**	**9,050**	**8,992**	**9,102**	**8,919**	**9,089**	**9,061**	**7,826**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	7,139	7,426	8,268	8,373	8,737	8,863	9,117	9,090	9,029	8,991	8,950	8,922	8,831	8,794	8,609	7,632	6,740
Wind	GWh	2,198	2,229	2,196	4,961	4,946	4,975	4,962	4,981	4,955	4,738	4,756	4,737	4,741	4,738	4,752	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,146	1,164	1,182	367	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	3,549	4,816	5,965	7,281	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	49	33	26	3	16	32	34	32	20	22	16	18	14	10	5	2	1	1	-	-
Gas Combined Cycle	GWh	2,540	2,527	2,278	2,326	2,373	2,540	2,661	2,502	2,522	2,458	2,548	2,537	2,403	2,501	2,147	2,048	1,834	1,619	1,570	-
Gas/Hydrogen Turbine	GWh	471	475	414	409	562	878	877	935	847	854	795	778	741	736	354	182	81	55	24	72
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	50	126	363
Total Generation	**GWh**	**13,775**	**14,439**	**15,138**	**18,846**	**19,318**	**20,015**	**19,939**	**20,165**	**20,324**	**20,406**	**20,406**	**20,433**	**20,284**	**20,280**	**20,811**	**20,839**	**21,215**	**21,822**	**21,494**	**21,568**
Market Purchases	**GWh**	**58**	**388**	**740**	**727**	**722**	**626**	**659**	**674**	**685**	**726**	**805**	**843**	**964**	**1,099**	**893**	**921**	**790**	**608**	**637**	**635**
Market Sales	**GWh**	**2,092**	**1,402**	**954**	**929**	**920**	**1,287**	**1,119**	**1,140**	**1,161**	**1,102**	**1,047**	**952**	**805**	**737**	**942**	**901**	**1,087**	**1,403**	**1,056**	**1,027**
Net Generation *	**GWh**	**13,516**	**14,130**	**14,708**	**18,338**	**18,810**	**19,419**	**19,344**	**19,484**	**19,614**	**19,686**	**19,689**	**19,709**	**19,562**	**19,559**	**20,042**	**20,052**	**20,413**	**21,007**	**20,770**	**20,896**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS NGH 8760*
Future: *CTP*
Sensitivity: *Use the high natural gas price assumption in CTP*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	15.355	B$
20-Year Carbon Emissions	31.825	M Tons
20-Year Water Consumption	6.242	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	219	72	303	43	148	56	101	-	38	-	-	-	-	-	-	107	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	-	-	-	-	-	6	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	179	-	-	-	-	-	-	-	-	36	26	241	236
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	146	146	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	120	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,501**	**118**	**668**	**68**	**454**	**82**	**127**	**24**	**63**	**25**	**26**	**178**	**171**	**205**	**236**	**639**	**854**

Portfolio Summary

Scenario Information

Scenario: *CTP-SS SERVM Analysis 8760*
Future: *CTP*
Sensitivity: *Stakholder Scenario 10 SERVM Analysis re-ran in Encompass*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.277	B$
20-Year Carbon Emissions	41.983	M Tons
20-Year Water Consumption	7.319	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.03	15.05	19.36	19.24	17.63	18.71	19.70	20.77	20.16	18.24	18.03	17.49	17.10	16.23	13.00	13.00	13.00	13.10	13.00	13.20
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	199	198	198	198	197	197	197	197	169	147	121	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,315	1,319	1,356	1,371	1,395	1,405	1,436	1,423	1,658	1,829	1,921	2,297	3,125
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,315	2,975	1,902	1,915	1,927	1,931	1,947	1,965	1,963	1,991	2,011	2,052	1,778	1,576	1,327	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	287	287	287	286	287	285	282	279	297	282	268	270	112

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,776	2,779	2,858	2,910	2,947	2,956	3,069	3,054	3,042	3,011	2,999	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,261	2,366	2,402	2,549	2,432	2,227
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	120	120	120	120	120
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,476**	**8,508**	**8,512**	**8,588**	**8,651**	**8,685**	**8,824**	**8,712**	**8,967**	**8,784**	**9,034**	**8,991**	**7,765**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,693	7,951	7,964	8,197	8,358	8,462	8,487	8,811	8,790	8,696	8,662	8,497	7,631	6,740
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,736	4,741	4,738	4,753	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	48	56	47	49	36	41	54	43	53	37	14	13	8	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,876	2,701	2,801	2,726	2,813	2,792	2,657	2,752	2,652	2,838	2,724	2,458	2,348	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,014	1,150	1,109	1,169	1,151	1,189	1,262	1,250	1,072	934	648	524	283	111
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	389	514	441	414	294	315
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**19,624**	**19,814**	**19,994**	**20,098**	**20,316**	**20,553**	**20,595**	**20,940**	**21,099**	**21,560**	**21,757**	**22,157**	**22,706**	**21,558**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**748**	**768**	**752**	**748**	**755**	**708**	**745**	**719**	**683**	**486**	**434**	**312**	**141**	**642**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,497**	**1,790**	**944**	**978**	**1,015**	**936**	**997**	**1,000**	**964**	**1,044**	**1,073**	**1,235**	**1,319**	**1,483**	**1,761**	**1,025**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,080**	**19,228**	**19,402**	**19,498**	**19,690**	**19,892**	**19,940**	**20,246**	**20,383**	**20,821**	**21,001**	**21,383**	**21,972**	**20,887**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-SS SERVM Analysis 8760*
Future: *CTP*
Sensitivity: *Stakholder Scenario 10 SERVM Analysis re-ran in Encompass*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.277	B$
20-Year Carbon Emissions	41.983	M Tons
20-Year Water Consumption	7.319	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	111	17	93	66	94	23	126	-	-	-	-	155	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	11	105	36	147	153	245
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**237**	**44**	**121**	**90**	**118**	**47**	**152**	**122**	**316**	**205**	**316**	**625**	**863**

Portfolio Summary

Scenario Information

Scenario: *CTP-TOU P2 8760*
Future: *CTP*
Sensitivity: *Time Of Use forecast impact to CTP*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.178	B$
20-Year Carbon Emissions	41.948	M Tons
20-Year Water Consumption	7.318	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,354	3,388	3,386	3,455	3,483	3,546	3,563	3,589	3,611	3,654	3,656	3,661	3,639	3,628	3,640	3,686
PRM	%	15.05	15.10	19.42	19.31	16.86	17.95	18.97	20.21	19.94	18.22	18.29	18.08	17.98	17.34	14.40	14.40	14.42	14.50	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	335	294	199	199	199	198	198	197	197	197	197	197	170	148	121	-
Revenue Requirement	M$	523	572	693	1,197	1,197	1,280	1,266	1,308	1,312	1,348	1,363	1,387	1,397	1,427	1,416	1,643	1,806	1,883	2,249	3,083
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,319	2,983	1,898	1,911	1,920	1,931	1,939	1,960	1,957	1,986	2,006	2,051	1,778	1,577	1,326	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	287	287	286	286	287	285	282	279	297	282	267	270	113

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,468	2,603	2,673	2,767	2,763	2,863	2,892	2,938	2,944	3,058	3,043	3,031	3,000	2,988	3,055	2,437
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	2	5	10	12	14	15	15	16	17	17	19	21	22	22	22	22
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,272	2,345	2,345	2,426	2,260	2,068
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	120	120	120	120	120
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,811**	**8,315**	**8,214**	**8,437**	**8,462**	**8,486**	**8,540**	**8,611**	**8,643**	**8,783**	**8,681**	**8,904**	**8,685**	**8,870**	**8,786**	**7,573**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,055	7,452	7,674	7,923	7,917	8,211	8,306	8,434	8,451	8,779	8,757	8,664	8,630	8,461	7,617	6,723
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,736	4,741	4,738	4,753	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	2	6	12	16	18	19	20	20	21	21	22	22	22	22	22	22
Coal	GWh	1,090	1,073	1,109	1,139	1,172	397	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	67	126	48	56	47	49	36	41	53	43	54	37	15	14	8	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,851	3,005	2,874	2,702	2,801	2,722	2,815	2,792	2,659	2,752	2,652	2,837	2,719	2,439	2,329	-
Gas/Hydrogen Turbine	GWh	525	866	891	990	1,386	1,900	1,009	1,142	1,098	1,172	1,138	1,181	1,252	1,242	1,063	933	653	536	294	123
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	388	512	439	415	297	319
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,661**	**20,278**	**20,799**	**19,587**	**19,768**	**19,924**	**20,098**	**20,240**	**20,505**	**20,538**	**20,887**	**21,045**	**21,512**	**21,711**	**22,105**	**22,674**	**21,546**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**273**	**237**	**747**	**769**	**764**	**729**	**763**	**706**	**746**	**715**	**680**	**482**	**439**	**330**	**158**	**629**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,488**	**1,786**	**943**	**973**	**1,001**	**957**	**977**	**997**	**956**	**1,039**	**1,069**	**1,238**	**1,333**	**1,506**	**1,803**	**1,074**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,795**	**20,274**	**19,047**	**19,187**	**19,339**	**19,499**	**19,622**	**19,850**	**19,888**	**20,200**	**20,335**	**20,779**	**20,960**	**21,336**	**21,943**	**20,894**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-TOU P2 8760*
Future: *CTP*
Sensitivity: *Time Of Use forecast impact to CTP*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.178	B$
20-Year Carbon Emissions	41.948	M Tons
20-Year Water Consumption	7.318	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	35	150	83	108	10	114	43	102	20	127	-	-	-	-	162	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	16	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	22	73	-	81	104	258
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**51**	**515**	**109**	**234**	**37**	**142**	**67**	**127**	**44**	**153**	**132**	**284**	**170**	**251**	**584**	**875**

Portfolio Summary

Scenario Information

Scenario: *CTP-XmsnBW P2 8760*
Future: *CTP*
Sensitivity: *Blackwater DC Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.079	B$
20-Year Carbon Emissions	37.151	M Tons
20-Year Water Consumption	6.832	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	20.88	20.28	18.37	18.16	17.62	17.25	16.38	14.40	14.40	14.40	14.48	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	199	198	158	160	148	149	142	133	117	103	91	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,315	1,319	1,355	1,306	1,327	1,336	1,362	1,380	1,630	1,803	1,893	2,293	3,044
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,315	2,975	1,902	1,915	1,927	1,931	1,501	1,538	1,414	1,448	1,378	1,295	1,167	1,058	979	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	287	287	287	249	253	236	239	220	220	213	208	220	103

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,776	2,779	2,858	2,910	2,947	2,956	3,068	3,053	3,041	3,010	2,998	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,285	2,392	2,428	2,580	2,462	2,248
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	160	160	160	160	160
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,476**	**8,508**	**8,512**	**8,588**	**8,651**	**8,685**	**8,824**	**8,775**	**9,032**	**8,849**	**9,105**	**9,060**	**7,826**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,693	7,951	7,964	8,197	8,358	8,461	8,488	8,811	8,792	8,697	8,663	8,505	7,639	6,750
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,737	4,741	4,738	4,754	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	48	56	47	49	21	25	18	19	11	11	8	7	9	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,876	2,701	2,801	2,726	2,725	2,743	2,585	2,665	2,442	2,376	2,182	1,961	1,820	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,014	1,150	1,109	1,169	487	527	448	443	331	238	203	176	155	5
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	235	241	198	208	195	108
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**19,624**	**19,814**	**19,994**	**20,098**	**19,548**	**19,827**	**19,674**	**20,022**	**19,956**	**20,103**	**20,522**	**21,108**	**21,960**	**21,256**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**748**	**768**	**752**	**747**	**2,583**	**2,580**	**2,711**	**2,692**	**2,828**	**3,075**	**3,068**	**2,918**	**2,577**	**2,742**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,497**	**1,790**	**944**	**978**	**1,015**	**936**	**2,120**	**2,229**	**2,072**	**2,186**	**2,197**	**2,537**	**2,916**	**3,286**	**3,723**	**3,089**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,080**	**19,228**	**19,402**	**19,499**	**18,985**	**19,249**	**19,082**	**19,415**	**19,362**	**19,534**	**19,964**	**20,580**	**21,497**	**20,851**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-XmsnBW P2 8760*
Future: *CTP*
Sensitivity: *Blackwater DC Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.079	B$
20-Year Carbon Emissions	37.151	M Tons
20-Year Water Consumption	6.832	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	111	17	93	66	94	23	125	-	-	-	-	155	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	35	107	36	152	151	237
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**237**	**44**	**121**	**90**	**118**	**47**	**151**	**186**	**317**	**206**	**322**	**623**	**854**

Portfolio Summary

Scenario Information

Scenario: *CTP-XmsnFC P2 8760*
Future: *CTP*
Sensitivity: *Four Corners Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.443	B$
20-Year Carbon Emissions	42.052	M Tons
20-Year Water Consumption	7.289	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	20.88	20.28	18.37	18.16	17.62	17.25	16.38	14.40	14.40	14.40	14.48	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	199	198	198	198	197	197	197	198	170	149	121	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,315	1,319	1,356	1,404	1,428	1,438	1,467	1,479	1,714	1,884	1,976	2,351	3,162
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,315	2,975	1,902	1,915	1,927	1,931	1,947	1,965	1,963	1,991	2,017	2,069	1,795	1,595	1,337	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	287	287	287	286	287	285	282	270	293	279	264	267	106

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,776	2,779	2,858	2,910	2,947	2,956	3,068	3,053	3,041	3,010	2,998	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,285	2,392	2,428	2,580	2,462	2,248
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	160	160	160	160	160
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,476**	**8,508**	**8,512**	**8,588**	**8,651**	**8,685**	**8,824**	**8,775**	**9,032**	**8,849**	**9,105**	**9,060**	**7,826**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,693	7,951	7,964	8,197	8,358	8,462	8,487	8,809	8,788	8,695	8,661	8,497	7,632	6,740
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,736	4,741	4,738	4,753	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	48	56	47	49	36	41	54	43	40	30	10	8	7	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,876	2,701	2,801	2,726	2,813	2,792	2,657	2,753	2,641	2,835	2,722	2,455	2,340	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,014	1,150	1,109	1,169	1,151	1,189	1,262	1,249	972	859	588	475	247	28
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	573	672	572	533	374	218
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,844**	**19,624**	**19,814**	**19,994**	**20,098**	**20,316**	**20,553**	**20,595**	**20,937**	**21,157**	**21,630**	**21,820**	**22,218**	**22,741**	**21,379**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**748**	**768**	**752**	**748**	**755**	**708**	**745**	**719**	**649**	**447**	**397**	**287**	**141**	**901**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,497**	**1,790**	**944**	**978**	**1,015**	**936**	**997**	**1,000**	**964**	**1,043**	**1,096**	**1,268**	**1,347**	**1,523**	**1,798**	**1,108**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,080**	**19,228**	**19,402**	**19,498**	**19,690**	**19,892**	**19,940**	**20,245**	**20,440**	**20,892**	**21,066**	**21,448**	**22,008**	**20,711**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-XmsnFC P2 8760*
Future: *CTP*
Sensitivity: *Four Corners Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.443	B$
20-Year Carbon Emissions	42.052	M Tons
20-Year Water Consumption	7.289	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	111	17	93	66	94	23	125	-	-	-	-	155	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	35	107	36	152	151	237
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**237**	**44**	**121**	**90**	**118**	**47**	**151**	**186**	**317**	**206**	**322**	**623**	**854**

Portfolio Summary

Scenario Information

Scenario: *CTP-XmsnRS P2 8760*
Future: *CTP*
Sensitivity: *Rio Sol Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.082	B$
20-Year Carbon Emissions	43.644	M Tons
20-Year Water Consumption	7.529	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	20.88	20.28	18.37	18.16	17.62	17.25	16.38	14.40	14.40	14.40	14.48	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	198	198	197	196	196	195	196	196	197	192	171	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,234	1,271	1,274	1,318	1,340	1,361	1,374	1,399	1,418	1,658	1,817	1,897	2,267	3,089
Carbon Emission	k-tons	2,603	2,912	2,892	3,000	3,315	2,977	1,898	1,911	1,923	1,927	1,943	1,961	1,958	1,988	2,014	2,068	2,160	2,188	2,005	-
Water Consumption	k-gallons	569	610	616	610	647	466	299	298	299	297	296	296	297	296	275	289	315	324	328	104

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,776	2,779	2,858	2,910	2,947	2,956	3,068	3,053	3,041	3,010	2,998	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,285	2,392	2,428	2,580	2,462	2,248
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	160	160	160	160	160
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,476**	**8,508**	**8,512**	**8,588**	**8,651**	**8,685**	**8,824**	**8,775**	**9,032**	**8,849**	**9,105**	**9,060**	**7,826**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,694	7,951	7,965	8,197	8,358	8,462	8,488	8,811	8,793	8,697	8,664	8,505	7,639	6,750
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,955	4,738	4,756	4,737	4,741	4,738	4,754	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	82	99	90	91	78	77	99	87	59	42	58	68	42	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,811	2,646	2,750	2,672	2,769	2,763	2,600	2,740	2,617	2,822	2,905	2,772	2,777	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,896	1,002	1,118	1,075	1,137	1,112	1,147	1,227	1,185	980	831	885	1,001	792	5
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	537	687	710	718	635	137
Total Generation	**GWh**	**13,903**	**15,173**	**16,032**	**19,662**	**20,329**	**20,846**	**19,581**	**19,770**	**19,952**	**20,054**	**20,274**	**20,519**	**20,549**	**20,906**	**21,129**	**21,618**	**22,488**	**23,316**	**24,027**	**21,284**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**2,551**	**2,546**	**2,512**	**2,542**	**2,461**	**2,432**	**2,461**	**2,406**	**2,321**	**2,059**	**1,615**	**1,272**	**867**	**2,192**
Market Sales	**GWh**	**2,202**	**1,867**	**1,424**	**1,336**	**1,497**	**1,789**	**2,720**	**2,725**	**2,757**	**2,727**	**2,740**	**2,795**	**2,729**	**2,833**	**2,891**	**3,050**	**3,429**	**3,817**	**4,022**	**2,523**
Net Generation *	**GWh**	**13,644**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,053**	**19,197**	**19,384**	**19,496**	**19,727**	**19,963**	**19,989**	**20,347**	**20,563**	**21,062**	**21,930**	**22,757**	**23,506**	**20,834**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-XmsnRS P2 8760*
Future: *CTP*
Sensitivity: *Rio Sol Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.082	B$
20-Year Carbon Emissions	43.644	M Tons
20-Year Water Consumption	7.529	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	111	17	93	66	94	23	125	-	-	-	-	155	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	35	107	36	152	151	237
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**237**	**44**	**121**	**90**	**118**	**47**	**151**	**186**	**317**	**206**	**322**	**623**	**854**

Portfolio Summary

Scenario Information

Scenario: *CTP-XmsnSZ P2 8760*
Future: *CTP*
Sensitivity: *SunZia Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.822	B$
20-Year Carbon Emissions	46.920	M Tons
20-Year Water Consumption	8.078	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	20.88	20.28	18.37	18.16	17.62	17.25	16.38	14.40	14.40	14.40	14.48	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	402	376	397	362	199	199	198	198	197	196	196	195	196	196	197	197	178	-
Revenue Requirement	M$	523	572	659	1,135	1,139	1,193	1,224	1,260	1,263	1,307	1,331	1,353	1,365	1,390	1,410	1,650	1,808	1,886	2,255	3,082
Carbon Emission	k-tons	2,603	2,913	3,277	3,857	4,209	3,949	1,897	1,910	1,921	1,925	1,941	1,960	1,957	1,986	2,013	2,067	2,159	2,262	2,115	-
Water Consumption	k-gallons	569	610	681	728	797	642	300	298	300	300	299	298	297	297	276	291	317	334	341	103

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,776	2,779	2,858	2,910	2,947	2,956	3,068	3,053	3,041	3,010	2,998	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,285	2,392	2,428	2,580	2,462	2,248
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	160	160	160	160	160
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,476**	**8,508**	**8,512**	**8,588**	**8,651**	**8,685**	**8,824**	**8,775**	**9,032**	**8,849**	**9,105**	**9,060**	**7,826**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,371	6,876	7,101	7,498	7,693	7,951	7,965	8,197	8,358	8,462	8,488	8,811	8,792	8,697	8,663	8,505	7,639	6,750
Wind	GWh	2,198	2,229	2,196	4,962	4,946	4,974	4,962	4,980	4,955	4,738	4,756	4,737	4,741	4,738	4,754	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,073	1,158	1,197	409	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	196	224	338	442	89	104	98	102	89	89	105	97	66	49	66	82	60	-
Gas Combined Cycle	GWh	2,608	2,823	2,885	3,000	2,965	3,227	2,799	2,624	2,727	2,647	2,743	2,735	2,576	2,708	2,588	2,801	2,873	2,811	2,823	-
Gas/Hydrogen Turbine	GWh	525	867	1,262	1,950	2,334	2,873	998	1,124	1,077	1,136	1,112	1,149	1,234	1,191	994	837	891	1,066	888	5
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	531	685	716	730	669	135
Total Generation	**GWh**	**13,903**	**15,174**	**16,690**	**21,013**	**21,694**	**22,379**	**19,572**	**19,759**	**19,938**	**20,039**	**20,259**	**20,504**	**20,538**	**20,891**	**21,115**	**21,609**	**22,477**	**23,445**	**24,221**	**21,282**
Market Purchases	**GWh**	**40**	**119**	**1,394**	**1,427**	**1,322**	**1,290**	**2,837**	**2,840**	**2,812**	**2,855**	**2,767**	**2,723**	**2,758**	**2,706**	**2,607**	**2,359**	**1,915**	**1,490**	**1,034**	**2,415**
Market Sales	**GWh**	**2,202**	**1,867**	**3,204**	**3,815**	**3,923**	**4,377**	**3,000**	**3,011**	**3,045**	**3,026**	**3,033**	**3,077**	**3,023**	**3,127**	**3,174**	**3,350**	**3,726**	**4,180**	**4,396**	**2,765**
Net Generation *	**GWh**	**13,644**	**14,863**	**16,303**	**20,524**	**21,212**	**21,845**	**19,047**	**19,188**	**19,372**	**19,481**	**19,713**	**19,954**	**19,986**	**20,342**	**20,560**	**21,064**	**21,927**	**22,902**	**23,713**	**20,854**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP-XmsnSZ P2 8760*
Future: *CTP*
Sensitivity: *SunZia Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	13.822	B$
20-Year Carbon Emissions	46.920	M Tons
20-Year Water Consumption	8.078	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	111	17	93	66	94	23	125	-	-	-	-	155	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	35	107	36	152	151	237
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**237**	**44**	**121**	**90**	**118**	**47**	**151**	**186**	**317**	**206**	**322**	**623**	**854**

Portfolio Summary

Scenario Information

Scenario: *HEG P3 8760*
Future: *HEG*
Sensitivity: *High Economic Growth base case*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.749	B$
20-Year Carbon Emissions	46.763	M Tons
20-Year Water Consumption	11.837	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.40	14.69	19.84	20.86	18.79	18.16	16.97	15.96	15.24	15.26	15.42	14.40	14.47	14.40	14.58
Carbon Intensity	lbs/MWh	394	403	389	319	335	282	200	201	201	200	200	199	199	199	199	200	183	164	137	-
Revenue Requirement	M$	541	605	736	1,280	1,326	1,432	1,421	1,545	1,591	1,637	1,664	1,693	1,717	1,776	1,852	2,117	2,290	2,412	2,823	3,751
Carbon Emission	k-tons	2,733	3,039	3,098	3,195	3,498	3,059	2,072	2,094	2,148	2,185	2,219	2,217	2,255	2,277	2,323	2,380	2,219	2,023	1,727	-
Water Consumption	k-gallons	587	626	644	635	663	477	307	303	636	639	656	655	665	682	652	673	665	643	636	392

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,638	2,763	3,084	3,168	3,274	3,400	3,441	3,461	3,441	3,571	3,639	3,625	3,613	3,581	3,570	3,703	3,084
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,474	1,474	1,485	1,555	1,555	1,555	1,555	1,555	1,555	1,249	1,249	999	999
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,095	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,407	2,621	2,575	2,345
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	280	400	400	400	400	440
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	300	300	300	300	300	300	300	300	300	300	300	300	300
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,020**	**8,281**	**8,981**	**8,896**	**9,346**	**9,601**	**9,679**	**9,795**	**9,800**	**9,955**	**10,090**	**10,126**	**10,356**	**10,138**	**10,457**	**10,557**	**9,346**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	7,430	7,915	8,849	9,118	9,399	9,770	9,890	9,963	9,897	10,273	10,470	10,453	10,356	10,322	10,161	9,510	8,616
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,975	4,962	5,033	5,009	5,182	5,443	5,421	5,425	5,423	5,441	4,617	4,248	4,028	3,443	3,431
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,133	1,140	1,172	371	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	93	105	69	92	165	68	80	70	79	77	80	102	77	41	24	15	13	9	-
Gas Combined Cycle	GWh	2,732	2,920	2,747	2,880	2,857	2,961	2,888	2,703	2,817	2,739	2,834	2,833	2,667	2,799	2,661	2,832	2,784	2,506	2,457	-
Gas/Hydrogen Turbine	GWh	625	983	1,094	1,215	1,635	2,048	1,258	1,408	1,423	1,524	1,516	1,512	1,657	1,485	913	714	599	494	299	145
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	197	1,322	1,582	1,439	1,410	1,062	1,290
Total Generation	**GWh**	**14,142**	**15,399**	**16,353**	**20,539**	**21,429**	**22,325**	**21,324**	**21,600**	**22,206**	**22,633**	**23,034**	**23,077**	**23,518**	**23,796**	**24,219**	**24,732**	**25,110**	**25,520**	**26,165**	**25,128**
Market Purchases	**GWh**	**63**	**243**	**470**	**402**	**353**	**243**	**781**	**822**	**695**	**613**	**575**	**703**	**661**	**727**	**642**	**511**	**475**	**397**	**227**	**733**
Market Sales	**GWh**	**1,975**	**1,530**	**1,159**	**1,228**	**1,386**	**1,782**	**1,049**	**973**	**1,143**	**1,152**	**1,199**	**1,057**	**1,113**	**1,062**	**1,122**	**1,244**	**1,339**	**1,390**	**1,553**	**707**
Net Generation *	**GWh**	**13,884**	**15,090**	**15,927**	**20,030**	**20,901**	**21,705**	**20,700**	**20,857**	**21,424**	**21,839**	**22,223**	**22,267**	**22,658**	**22,919**	**23,323**	**23,836**	**24,198**	**24,611**	**25,276**	**24,255**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG P3 8760*
Future: *HEG*
Sensitivity: *High Economic Growth base case*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.749	B$
20-Year Carbon Emissions	46.763	M Tons
20-Year Water Consumption	11.837	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	320	140	335	98	120	140	55	34	37	143	82	-	-	-	-	228	300
Wind	MW	-	-	-	800	-	-	-	16	-	114	70	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	131	311	-	-	-	-	-	-	-	-	-	-	1	214	223	220
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	240	120	-	-	-	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	300	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,615**	**317**	**711**	**123**	**462**	**267**	**196**	**129**	**61**	**168**	**148**	**271**	**291**	**171**	**384**	**768**	**878**

Portfolio Summary

Scenario Information

Scenario: *HEG-CO2_400thru44 P3 8760*
Future: *HEG*
Sensitivity: *ETA 400 through 2044, zero CO2 by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.663	B$
20-Year Carbon Emissions	52.237	M Tons
20-Year Water Consumption	12.626	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.84	15.14	18.36	19.40	17.42	16.60	15.44	14.40	14.60	14.40	14.56	14.43	14.49	14.40	14.56
Carbon Intensity	lbs/MWh	394	403	389	312	336	297	268	266	259	248	246	248	242	254	201	186	167	169	137	-
Revenue Requirement	M$	541	605	736	1,284	1,336	1,430	1,401	1,499	1,552	1,604	1,627	1,656	1,683	1,754	1,868	2,137	2,332	2,432	2,850	3,775
Carbon Emission	k-tons	2,733	3,039	3,098	3,141	3,510	3,197	2,899	2,944	2,920	2,830	2,830	2,868	2,787	2,988	2,389	2,229	2,026	2,076	1,732	-
Water Consumption	k-gallons	587	626	644	627	663	496	392	400	732	716	746	763	744	765	702	686	666	641	637	392

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,712	2,763	2,941	3,047	3,186	3,304	3,357	3,403	3,389	3,400	3,386	3,371	3,359	3,328	3,520	3,725	3,107
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,528	1,528	1,555	1,555	1,555	1,555	1,555	1,555	1,555	1,249	1,249	999	999
Demand Response	MW	70	70	70	70	2	5	10	12	14	15	15	16	17	17	19	21	22	22	22	22
Short Duration Storage	MW	992	1,160	1,640	1,951	1,951	2,251	2,251	2,281	2,281	2,281	2,281	2,281	2,281	2,281	2,285	2,285	2,285	2,529	2,492	2,369
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	80	160	280	320	440	440	440
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	100	100	100	300	300	300	300	300	300	300	300	300	300	300	300	300
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,082**	**8,208**	**8,753**	**8,689**	**9,157**	**9,403**	**9,510**	**9,582**	**9,593**	**9,629**	**9,722**	**9,748**	**9,978**	**9,799**	**10,325**	**10,506**	**9,363**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,371	7,647	7,915	8,433	8,764	9,141	9,489	9,645	9,793	9,744	9,776	9,736	9,716	9,620	9,586	10,016	9,573	8,681
Wind	GWh	2,198	2,229	2,197	4,962	4,945	4,975	4,962	5,220	5,195	5,423	5,443	5,422	5,425	5,422	5,440	4,617	4,248	4,028	3,443	3,431
Demand Response	GWh	29	29	29	29	2	6	12	16	18	19	20	20	21	21	22	22	22	22	22	22
Coal	GWh	1,090	1,073	1,133	1,131	1,163	391	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	3,549	4,816	5,965	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	93	105	65	98	181	185	231	204	203	187	228	217	199	94	32	13	11	8	-
Gas Combined Cycle	GWh	2,732	2,920	2,746	2,839	2,855	3,024	3,086	2,868	3,037	2,887	3,026	3,031	2,831	3,044	2,718	2,812	2,741	2,514	2,434	-
Gas/Hydrogen Turbine	GWh	625	983	1,094	1,177	1,661	2,169	2,273	2,438	2,310	2,276	2,196	2,208	2,235	2,139	1,325	802	560	480	274	139
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	399	752	1,130	1,102	1,543	1,131	1,269
Total Generation	**GWh**	**14,142**	**15,399**	**16,353**	**20,663**	**21,438**	**22,116**	**22,290**	**22,864**	**23,340**	**23,639**	**23,834**	**23,955**	**23,867**	**24,271**	**24,663**	**24,844**	**25,178**	**25,488**	**26,236**	**25,154**
Market Purchases	**GWh**	**63**	**243**	**470**	**364**	**355**	**289**	**308**	**280**	**209**	**235**	**263**	**328**	**465**	**441**	**401**	**415**	**388**	**399**	**227**	**728**
Market Sales	**GWh**	**1,975**	**1,530**	**1,159**	**1,305**	**1,366**	**1,627**	**1,544**	**1,702**	**1,782**	**1,770**	**1,681**	**1,546**	**1,327**	**1,345**	**1,367**	**1,304**	**1,370**	**1,387**	**1,612**	**724**
Net Generation *	**GWh**	**13,884**	**15,090**	**15,928**	**20,145**	**20,880**	**21,505**	**21,668**	**22,128**	**22,549**	**22,835**	**23,017**	**23,131**	**23,068**	**23,488**	**23,809**	**23,992**	**24,316**	**24,606**	**25,334**	**24,278**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-CO2_400thru44 P3 8760*
Future: *HEG*
Sensitivity: *ETA 400 through 2044, zero CO2 by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.663	B$
20-Year Carbon Emissions	52.237	M Tons
20-Year Water Consumption	12.626	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	394	65	192	120	153	132	67	60	42	24	-	-	-	-	203	300	300
Wind	MW	-	-	-	800	-	-	-	70	-	130	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	16	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	311	-	300	-	30	-	-	-	-	-	-	4	-	-	244	233	327
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	-	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	80	80	120	40	120	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	100	-	-	200	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,677**	**181**	**557**	**145**	**479**	**258**	**224**	**85**	**67**	**49**	**106**	**261**	**291**	**210**	**591**	**850**	**945**

Portfolio Summary

Scenario Information

Scenario: *HEG-LateLDES P3 8760*
Future: *HEG*
Sensitivity: *Late Long Duration Energy Storage available beginning 2036*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.758	B$
20-Year Carbon Emissions	47.096	M Tons
20-Year Water Consumption	9.297	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.40	14.71	16.28	15.29	14.40	14.59	14.45	14.40	14.65	14.82	14.99	14.87	15.12	14.53	14.57
Carbon Intensity	lbs/MWh	394	403	389	319	335	284	200	200	199	199	199	198	198	198	198	198	196	178	155	-
Revenue Requirement	M$	541	605	736	1,280	1,326	1,431	1,422	1,508	1,523	1,592	1,634	1,685	1,726	1,805	1,906	2,167	2,354	2,467	2,837	3,814
Carbon Emission	k-tons	2,733	3,039	3,098	3,195	3,498	3,077	2,072	2,083	2,106	2,171	2,172	2,200	2,226	2,255	2,282	2,334	2,380	2,212	1,964	-
Water Consumption	k-gallons	587	626	644	635	663	479	307	304	304	297	292	284	276	262	599	590	609	588	579	370

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,638	2,763	3,061	3,168	3,244	3,230	3,325	3,311	3,358	3,428	3,508	3,493	3,481	3,450	3,438	3,459	2,840
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,471	1,513	1,531	1,531	1,531	1,531	1,531	1,531	1,531	1,225	1,225	975	975
Demand Response	MW	70	70	70	70	32	35	40	43	45	46	46	47	47	47	50	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,094	2,407	2,407	2,899	2,899	2,899	2,899	2,899	2,899	2,899	2,899	2,899	2,899	2,899	2,629	2,379
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	40	80	120	160	240	400	520	560	640	680	720
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,020**	**8,281**	**8,960**	**8,898**	**9,507**	**9,563**	**9,743**	**9,794**	**9,906**	**10,041**	**10,227**	**10,284**	**10,514**	**10,335**	**10,519**	**10,323**	**9,092**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	7,430	7,915	8,782	9,117	9,310	9,274	9,553	9,525	9,656	9,859	10,089	10,074	9,975	9,942	9,778	8,797	7,904
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,975	4,962	5,025	5,144	5,338	5,358	5,336	5,341	5,338	5,355	4,532	4,164	3,943	3,358	3,346
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	33	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,133	1,140	1,172	373	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	93	105	69	92	167	68	77	66	63	45	35	40	15	16	8	8	6	4	-
Gas Combined Cycle	GWh	2,732	2,920	2,747	2,880	2,857	2,969	2,888	2,731	2,843	2,744	2,846	2,831	2,689	2,788	2,650	2,812	2,837	2,551	2,558	-
Gas/Hydrogen Turbine	GWh	625	983	1,094	1,215	1,635	2,066	1,258	1,374	1,343	1,368	1,187	1,115	1,106	882	584	404	470	341	191	45
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	208	408	598	794	1,114	1,733	1,942	1,933	2,011	1,644	1,769
Total Generation	**GWh**	**14,142**	**15,399**	**16,353**	**20,539**	**21,429**	**22,287**	**21,323**	**21,494**	**21,788**	**22,492**	**22,569**	**22,903**	**23,223**	**23,571**	**23,802**	**24,281**	**25,057**	**25,538**	**25,938**	**24,711**
Market Purchases	**GWh**	**63**	**243**	**470**	**402**	**353**	**250**	**781**	**822**	**837**	**621**	**729**	**722**	**713**	**770**	**733**	**571**	**366**	**325**	**269**	**821**
Market Sales	**GWh**	**1,975**	**1,530**	**1,159**	**1,228**	**1,386**	**1,756**	**1,048**	**952**	**983**	**1,130**	**1,016**	**1,004**	**1,008**	**1,017**	**943**	**1,033**	**1,358**	**1,511**	**1,587**	**640**
Net Generation *	**GWh**	**13,884**	**15,090**	**15,927**	**20,030**	**20,901**	**21,672**	**20,699**	**20,836**	**21,121**	**21,809**	**21,887**	**22,195**	**22,501**	**22,830**	**23,054**	**23,565**	**24,326**	**24,804**	**25,268**	**24,101**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-LateLDES P3 8760*
Future: *HEG*
Sensitivity: *Late Long Duration Energy Storage available beginning 2036*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.758	B$
20-Year Carbon Emissions	47.096	M Tons
20-Year Water Consumption	9.297	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	320	140	312	121	90	-	109	-	104	84	94	-	-	-	-	115	300
Wind	MW	-	-	-	800	-	-	-	13	42	120	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	48	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	131	313	-	492	-	-	-	-	-	-	-	-	-	-	-	200
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	40	40	40	40	80	160	120	40	80	40	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,615**	**318**	**690**	**146**	**621**	**68**	**295**	**64**	**168**	**148**	**200**	**291**	**291**	**210**	**250**	**472**	**858**

Portfolio Summary

Scenario Information

Scenario: *HEG-NoETA P3 8760*
Future: *HEG*
Sensitivity: *No CO2 emission limits, No RPS, No CO2 free by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.263	B$
20-Year Carbon Emissions	54.444	M Tons
20-Year Water Consumption	16.252	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.40	14.61	14.40	17.71	15.39	14.62	17.75	16.67	14.99	16.23	16.13	14.40	15.30	14.40	14.57
Carbon Intensity	lbs/MWh	394	408	389	319	335	285	268	273	262	260	256	263	257	270	178	159	169	152	151	169
Revenue Requirement	M$	541	604	736	1,280	1,323	1,426	1,389	1,435	1,540	1,578	1,605	1,699	1,725	1,760	1,943	2,149	2,212	2,281	2,582	3,033
Carbon Emission	k-tons	2,733	3,094	3,098	3,195	3,498	3,089	2,899	3,003	2,941	2,954	2,927	3,059	2,970	3,148	2,148	1,916	2,002	1,839	1,845	2,086
Water Consumption	k-gallons	587	633	644	635	663	480	392	407	962	984	1,047	985	968	1,066	1,018	1,009	993	987	951	841

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,638	2,763	3,046	3,032	3,163	3,329	3,463	3,522	3,507	3,506	3,493	3,478	3,466	3,435	3,423	3,628	2,839
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	43	45	46	46	47	47	47	50	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,094	2,409	2,409	2,633	2,633	2,633	2,633	2,633	2,633	2,633	2,633	2,633	2,655	2,655	2,597	2,154
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	580	726	726	872	1,018	1,164
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	833	833	833	666	666	666	666	666	845
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,020**	**8,281**	**8,946**	**8,763**	**9,148**	**9,542**	**9,601**	**9,685**	**9,874**	**9,898**	**9,910**	**9,999**	**10,109**	**9,765**	**9,869**	**9,885**	**8,856**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	7,430	7,915	8,739	8,721	9,076	9,561	9,954	10,141	10,089	10,086	10,045	10,019	9,926	9,896	9,728	9,291	7,905
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,975	4,962	4,980	4,956	4,738	4,756	4,737	4,741	4,738	4,752	3,932	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	33	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,133	1,140	1,172	374	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	4,789	6,053	5,965	7,281	8,543	9,516
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	102	105	69	92	168	184	238	206	238	220	176	166	203	73	39	42	37	34	-
Gas Combined Cycle	GWh	2,732	2,932	2,747	2,880	2,857	2,974	3,097	2,886	3,063	2,924	3,040	3,042	2,849	3,071	2,624	2,710	2,795	2,561	2,661	2,627
Gas/Hydrogen Turbine	GWh	625	1,046	1,094	1,215	1,635	2,077	2,269	2,514	2,321	2,403	2,302	2,603	2,609	2,681	1,582	1,183	1,259	1,162	1,099	1,577
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Generation	**GWh**	**14,142**	**15,484**	**16,353**	**20,539**	**21,429**	**22,262**	**22,263**	**22,672**	**23,225**	**23,477**	**23,660**	**23,980**	**23,845**	**24,084**	**24,921**	**24,871**	**24,496**	**24,976**	**25,227**	**25,265**
Market Purchases	**GWh**	**63**	**210**	**470**	**402**	**353**	**255**	**307**	**312**	**233**	**270**	**298**	**322**	**466**	**503**	**310**	**428**	**642**	**600**	**535**	**491**
Market Sales	**GWh**	**1,975**	**1,582**	**1,159**	**1,228**	**1,386**	**1,740**	**1,542**	**1,638**	**1,745**	**1,688**	**1,584**	**1,634**	**1,355**	**1,265**	**1,572**	**1,366**	**1,001**	**1,145**	**1,034**	**874**
Net Generation *	**GWh**	**13,884**	**15,175**	**15,927**	**20,030**	**20,901**	**21,651**	**21,667**	**22,032**	**22,487**	**22,718**	**22,885**	**23,225**	**23,095**	**23,346**	**24,106**	**24,042**	**23,693**	**24,163**	**24,449**	**24,665**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-NoETA P3 8760*
Future: *HEG*
Sensitivity: *No CO2 emission limits, No RPS, No CO2 free by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.263	B$
20-Year Carbon Emissions	54.444	M Tons
20-Year Water Consumption	16.252	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	320	140	297	-	145	179	149	73	42	12	-	-	-	-	-	300	129
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	48	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	131	314	-	224	-	-	-	-	-	-	-	-	21	-	213	7
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	292	146	-	146	146	146
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	179	-	-	-	-	-	-	-	179
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	200	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,615**	**318**	**676**	**25**	**396**	**406**	**174**	**98**	**245**	**37**	**26**	**323**	**171**	**45**	**170**	**684**	**486**

Portfolio Summary

Scenario Information

Scenario: *HEG-SS ETA Step Down P3 8760*
Future: *HEG*
Sensitivity: *Smooth out' the acquisition of new clean firm resources*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	17.105	B$
20-Year Carbon Emissions	37.258	M Tons
20-Year Water Consumption	11.184	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.40	14.71	18.31	19.38	17.67	16.89	15.78	18.19	19.86	14.40	15.18	14.40	14.47	14.40	14.56
Carbon Intensity	lbs/MWh	394	403	389	319	335	284	200	200	200	155	155	155	110	110	110	65	65	66	66	-
Revenue Requirement	M$	541	605	736	1,280	1,326	1,431	1,422	1,535	1,583	1,663	1,683	1,717	1,864	1,989	1,933	2,284	2,449	2,522	2,859	3,690
Carbon Emission	k-tons	2,733	3,039	3,098	3,195	3,498	3,076	2,072	2,093	2,151	1,674	1,710	1,746	1,258	1,323	1,327	800	825	822	819	-
Water Consumption	k-gallons	587	626	644	635	663	479	307	304	595	579	610	611	575	629	634	584	600	576	551	394

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,638	2,763	3,062	3,168	3,287	3,425	3,570	3,713	3,843	3,848	3,835	3,820	3,808	3,776	3,844	3,901	3,160
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,555	1,555	1,555	1,555	1,555	1,555	1,555	1,249	1,249	999	999
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,095	2,408	2,408	2,843	2,843	2,843	2,843	2,843	2,843	2,843	2,843	2,843	2,856	2,860	2,661	2,392
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	434	580	580	872	1,018	1,018	1,164	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	200	400
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	200	300	300
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,020**	**8,281**	**8,961**	**8,897**	**9,580**	**9,847**	**10,115**	**10,284**	**10,439**	**10,615**	**10,774**	**10,570**	**10,827**	**10,620**	**10,882**	**10,787**	**9,429**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	7,431	7,915	8,783	9,117	9,435	9,842	10,265	10,696	11,059	11,064	11,000	10,980	10,821	10,756	10,856	10,069	8,833
Wind	GWh	2,198	2,229	2,197	4,961	4,946	4,975	4,962	4,980	4,956	5,422	5,443	5,421	5,424	5,417	5,435	4,605	4,248	4,027	3,443	3,431
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,133	1,140	1,172	373	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	3,572	4,699	4,789	7,290	8,438	8,518	9,784	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	93	105	69	92	167	68	79	68	26	23	26	7	9	17	2	2	1	0	-
Gas Combined Cycle	GWh	2,732	2,920	2,747	2,880	2,857	2,969	2,888	2,729	2,837	2,542	2,624	2,615	2,232	2,291	2,232	1,735	1,742	1,605	1,529	-
Gas/Hydrogen Turbine	GWh	625	983	1,094	1,215	1,635	2,065	1,257	1,388	1,414	916	918	980	473	540	582	81	119	89	66	159
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	169	268	1,174
Total Generation	**GWh**	**14,142**	**15,399**	**16,353**	**20,538**	**21,428**	**22,287**	**21,323**	**21,589**	**22,234**	**22,389**	**22,905**	**23,434**	**23,831**	**25,076**	**25,115**	**25,562**	**26,281**	**26,128**	**26,003**	**25,243**
Market Purchases	**GWh**	**63**	**243**	**470**	**402**	**353**	**250**	**781**	**787**	**659**	**767**	**733**	**677**	**677**	**329**	**382**	**397**	**212**	**449**	**414**	**718**
Market Sales	**GWh**	**1,975**	**1,530**	**1,159**	**1,228**	**1,386**	**1,756**	**1,048**	**981**	**1,170**	**1,041**	**1,180**	**1,311**	**1,381**	**1,873**	**1,698**	**1,858**	**2,129**	**1,863**	**1,417**	**774**
Net Generation *	**GWh**	**13,884**	**15,090**	**15,927**	**20,030**	**20,901**	**21,672**	**20,699**	**20,900**	**21,487**	**21,573**	**22,046**	**22,547**	**22,909**	**24,128**	**24,160**	**24,564**	**25,251**	**25,032**	**24,953**	**24,337**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-SS ETA Step Down P3 8760*
Future: *HEG*
Sensitivity: *Smooth out' the acquisition of new clean firm resources*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	17.105	B$
20-Year Carbon Emissions	37.258	M Tons
20-Year Water Consumption	11.184	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	320	140	312	121	133	153	158	157	187	18	-	-	-	-	79	152	177
Wind	MW	-	-	-	800	-	-	-	-	-	199	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	131	313	-	435	-	-	-	-	-	-	-	-	13	4	71	182
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	146	146	-	292	146	-	146	146
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	80	200
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	100	100	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,615**	**317**	**690**	**146**	**694**	**279**	**385**	**181**	**212**	**189**	**172**	**31**	**317**	**182**	**327**	**574**	**730**

Portfolio Summary

Scenario Information

Scenario: *HEG-SS Fusion P3 8760*
Future: *HEG*
Sensitivity: *Add fusion as a candidate resource, associated costs and operating characteristics.*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	15.964	B$
20-Year Carbon Emissions	41.849	M Tons
20-Year Water Consumption	15.374	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.40	14.71	15.17	18.43	16.10	15.32	15.17	15.09	14.40	15.51	16.12	18.29	19.92	18.06	14.57
Carbon Intensity	lbs/MWh	394	403	389	319	335	284	200	200	200	200	199	199	199	198	160	122	85	55	44	-
Revenue Requirement	M$	541	605	736	1,280	1,326	1,431	1,422	1,483	1,578	1,616	1,640	1,692	1,731	1,793	1,781	1,928	2,060	2,108	2,263	2,744
Carbon Emission	k-tons	2,733	3,039	3,098	3,195	3,498	3,076	2,072	2,095	2,136	2,155	2,176	2,217	2,231	2,262	1,955	1,516	1,084	727	582	-
Water Consumption	k-gallons	587	626	644	635	663	479	307	304	848	873	941	950	945	977	1,040	1,027	997	968	904	658

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	447	416	387	357	339	365
Solar	MW	1,775	2,025	2,266	2,638	2,763	3,062	3,168	3,294	3,380	3,506	3,572	3,657	3,689	3,797	3,782	3,770	3,739	3,727	3,632	2,714
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,095	2,408	2,408	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,468	2,046
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	40	80	120	120	120	120	120	120	120
Pumped Hydro	MW	-	-	-	-	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,020**	**8,281**	**8,961**	**8,897**	**9,382**	**9,697**	**9,747**	**9,838**	**9,988**	**10,086**	**10,260**	**10,050**	**10,008**	**9,643**	**9,601**	**8,957**	**6,922**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	977	915	863	811	790	841
Solar	GWh	4,898	5,582	6,370	7,430	7,915	8,783	9,117	9,455	9,710	10,079	10,286	10,521	10,617	10,926	10,906	10,813	10,782	10,622	9,308	7,545
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,975	4,962	4,980	4,956	4,738	4,756	4,737	4,741	4,738	4,753	3,933	3,563	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,133	1,140	1,172	373	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,095
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	93	105	69	92	167	68	82	69	75	70	64	71	48	57	17	3	2	1	-
Gas Combined Cycle	GWh	2,732	2,920	2,747	2,880	2,857	2,969	2,888	2,720	2,846	2,751	2,846	2,838	2,686	2,796	2,518	2,451	2,026	1,448	1,235	-
Gas/Hydrogen Turbine	GWh	625	983	1,094	1,215	1,635	2,065	1,257	1,394	1,383	1,473	1,450	1,385	1,349	1,229	1,001	488	205	91	33	6
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	201	413	567	482	329	179	109	66	142
Total Generation	**GWh**	**14,142**	**15,399**	**16,353**	**20,539**	**21,429**	**22,287**	**21,323**	**21,608**	**22,081**	**22,335**	**22,609**	**23,080**	**23,271**	**23,650**	**23,098**	**21,383**	**19,969**	**18,793**	**16,565**	**13,408**
Market Purchases	**GWh**	**63**	**243**	**470**	**402**	**353**	**250**	**781**	**797**	**727**	**742**	**786**	**723**	**759**	**801**	**202**	**113**	**33**	**17**	**4**	**235**
Market Sales	**GWh**	**1,975**	**1,530**	**1,159**	**1,228**	**1,386**	**1,756**	**1,048**	**1,032**	**1,088**	**1,015**	**1,014**	**1,076**	**1,002**	**1,033**	**1,744**	**1,838**	**2,236**	**2,622**	**2,672**	**2,042**
Net Generation *	**GWh**	**13,884**	**15,090**	**15,927**	**20,030**	**20,902**	**21,672**	**20,699**	**20,941**	**21,337**	**21,572**	**21,827**	**22,266**	**22,448**	**22,815**	**24,385**	**24,828**	**25,537**	**26,224**	**26,619**	**26,088**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-SS Fusion P3 8760*
Future: *HEG*
Sensitivity: *Add fusion as a candidate resource, associated costs and operating characteristics.*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	15.964	B$
20-Year Carbon Emissions	41.849	M Tons
20-Year Water Consumption	15.374	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	20	18	24	24	25	25
Solar	MW	-	-	-	320	140	312	121	140	100	140	80	141	46	121	-	-	-	-	-	-
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	131	313	-	330	-	-	-	-	-	-	-	-	-	-	-	28
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	300	300	300	300	300	300
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	40	40	40	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	200	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,615**	**317**	**690**	**146**	**496**	**327**	**167**	**104**	**206**	**111**	**187**	**324**	**318**	**324**	**324**	**325**	**353**

Portfolio Summary

Scenario Information

Scenario: *HEG-TOU P3 8760*
Future: *HEG*
Sensitivity: *Time Of Use forecast impact to HEG*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.536	B$
20-Year Carbon Emissions	46.634	M Tons
20-Year Water Consumption	11.626	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,635	3,699	3,724	3,824	3,883	3,976	4,024	4,084	4,142	4,223	4,263	4,305	4,323	4,352	4,409	4,496
PRM	%	9.20	8.99	13.64	14.41	14.40	14.40	14.68	16.29	17.68	15.56	15.31	14.54	14.75	14.40	14.66	15.09	14.40	14.47	14.40	14.57
Carbon Intensity	lbs/MWh	394	403	389	319	335	282	200	200	200	199	199	199	198	198	199	199	186	168	139	-
Revenue Requirement	M$	541	605	736	1,280	1,326	1,431	1,420	1,490	1,543	1,585	1,617	1,651	1,691	1,754	1,832	2,097	2,270	2,375	2,783	3,714
Carbon Emission	k-tons	2,733	3,039	3,097	3,195	3,493	3,060	2,065	2,082	2,120	2,141	2,173	2,201	2,217	2,265	2,308	2,364	2,253	2,067	1,762	-
Water Consumption	k-gallons	587	626	644	635	663	476	307	304	610	609	637	644	633	661	638	654	652	635	625	387

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,638	2,755	3,068	3,148	3,134	3,210	3,341	3,335	3,393	3,433	3,582	3,567	3,555	3,524	3,512	3,650	3,032
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,562	1,562	1,460	1,548	1,555	1,555	1,555	1,555	1,555	1,249	1,249	999	999
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,112	2,432	2,432	2,532	2,532	2,532	2,532	2,532	2,532	2,535	2,535	2,535	2,539	2,635	2,564	2,417
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	40	80	320	440	440	440	440	440
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,021**	**8,291**	**8,992**	**8,902**	**9,221**	**9,425**	**9,481**	**9,588**	**9,679**	**9,784**	**10,002**	**10,038**	**10,268**	**10,053**	**10,253**	**10,333**	**9,166**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	7,431	7,890	8,803	9,058	8,991	9,216	9,600	9,597	9,757	9,872	10,301	10,282	10,186	10,153	9,987	9,351	8,457
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,975	4,962	5,337	5,313	5,095	5,418	5,421	5,425	5,422	5,440	4,617	4,248	4,028	3,443	3,431
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,133	1,140	1,173	373	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	93	105	68	90	162	66	79	72	64	68	75	79	57	30	17	10	10	8	-
Gas Combined Cycle	GWh	2,732	2,920	2,747	2,880	2,862	2,966	2,893	2,728	2,843	2,754	2,853	2,839	2,699	2,799	2,654	2,826	2,797	2,528	2,476	-
Gas/Hydrogen Turbine	GWh	625	983	1,093	1,215	1,624	2,046	1,244	1,372	1,358	1,463	1,444	1,487	1,457	1,347	794	593	561	468	284	146
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	206	402	1,475	1,727	1,562	1,528	1,144	1,302
Total Generation	**GWh**	**14,142**	**15,399**	**16,353**	**20,539**	**21,397**	**22,280**	**21,255**	**21,485**	**21,920**	**22,195**	**22,581**	**22,912**	**23,133**	**23,673**	**24,064**	**24,573**	**25,034**	**25,457**	**26,093**	**24,982**
Market Purchases	**GWh**	**63**	**243**	**470**	**402**	**354**	**245**	**788**	**807**	**768**	**765**	**734**	**744**	**764**	**739**	**663**	**526**	**448**	**383**	**228**	**763**
Market Sales	**GWh**	**1,975**	**1,530**	**1,159**	**1,229**	**1,387**	**1,773**	**1,024**	**972**	**1,058**	**987**	**1,036**	**1,029**	**976**	**1,070**	**1,109**	**1,237**	**1,380**	**1,456**	**1,629**	**772**
Net Generation *	**GWh**	**13,884**	**15,090**	**15,927**	**20,030**	**20,871**	**21,662**	**20,634**	**20,835**	**21,229**	**21,483**	**21,861**	**22,156**	**22,375**	**22,871**	**23,243**	**23,765**	**24,218**	**24,640**	**25,298**	**24,236**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-TOU P3 8760*
Future: *HEG*
Sensitivity: *Time Of Use forecast impact to HEG*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.536	B$
20-Year Carbon Emissions	46.634	M Tons
20-Year Water Consumption	11.626	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	320	131	328	94	-	90	145	8	114	53	162	-	-	-	-	233	300
Wind	MW	-	-	-	800	-	-	-	104	-	-	88	7	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	148	320	-	100	-	-	-	-	-	3	-	-	4	96	198	304
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	40	40	240	120	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,616**	**326**	**712**	**119**	**331**	**217**	**173**	**121**	**146**	**118**	**231**	**271**	**291**	**173**	**266**	**748**	**921**

Portfolio Summary

Scenario Information

Scenario: *HEG-XED P3 APPP1 8760*
Future: *HEG*
Sensitivity: *Increased level of Economic Development*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	31.578	B$
20-Year Carbon Emissions	70.954	M Tons
20-Year Water Consumption	11.857	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	3,022	3,821	4,498	5,029	5,190	5,346	5,465	5,619	5,729	5,853	5,977	6,125	6,226	6,331	6,413	6,504	6,632	6,782
PRM	%	9.20	8.99	12.34	14.40	14.99	14.40	15.59	16.97	16.88	14.50	14.44	14.74	15.46	14.58	14.74	14.64	14.49	14.43	14.79	14.45
Carbon Intensity	lbs/MWh	394	403	401	318	233	255	205	205	204	204	204	204	204	203	202	199	203	203	198	-
Revenue Requirement	M$	541	605	765	1,579	2,527	3,049	3,185	3,260	3,314	3,385	3,475	3,586	3,719	3,806	3,971	4,275	4,497	4,660	5,122	6,826
Carbon Emission	k-tons	2,733	3,039	3,235	3,513	3,403	4,307	3,447	3,517	3,583	3,660	3,754	3,844	3,978	3,981	4,108	4,089	4,180	4,291	4,290	-
Water Consumption	k-gallons	587	626	660	664	636	480	287	286	635	637	660	656	707	678	702	697	617	619	629	394

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	3,238	6,072	6,508	6,794	6,780	6,868	6,991	7,197	7,407	7,394	7,380	7,365	7,353	7,342	7,330	7,433	6,815
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,692	1,753	1,787	1,818	1,818	1,818	1,818	1,818	1,818	1,512	1,512	1,262	1,262
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	2,345	3,602	3,937	4,578	4,578	4,578	4,578	4,578	4,578	4,578	4,578	4,578	4,578	4,578	4,578	4,308	3,858
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	434	434	580	726	726	872	1,164	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	120	600	680	680	680	680	760	880	880	960	1,120	1,280	1,520	1,640	1,760	2,000
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	100	200	300	300	500	500	500	500	500	500	500	500	500	500	500	500	500
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**9,102**	**13,418**	**14,836**	**15,673**	**16,122**	**16,399**	**16,583**	**16,925**	**17,281**	**17,439**	**17,532**	**17,634**	**17,904**	**17,799**	**18,023**	**17,989**	**16,612**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	9,175	17,177	18,767	19,674	19,587	19,848	20,207	20,840	21,413	21,366	21,333	21,328	21,216	21,250	21,089	20,366	19,453
Wind	GWh	2,198	2,229	2,197	4,961	4,861	4,970	4,961	5,784	5,967	6,217	6,349	6,323	6,327	6,325	6,344	5,519	5,151	4,931	4,349	4,334
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,145	1,154	1,073	361	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	3,572	3,462	4,789	6,053	5,965	7,281	9,784	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	92	119	104	182	186	37	50	47	67	61	57	79	53	57	41	16	19	25	-
Gas Combined Cycle	GWh	2,732	2,920	2,783	2,914	2,433	2,884	2,898	2,730	2,905	2,756	2,908	2,859	2,673	2,842	2,709	2,906	2,866	2,612	2,634	-
Gas/Hydrogen Turbine	GWh	625	983	1,243	1,618	1,475	1,931	1,050	1,213	1,245	1,342	1,246	1,075	1,388	1,005	1,014	719	302	337	278	132
Advanced Generator	GWh	-	-	-	-	483	3,041	3,419	3,495	3,423	3,577	3,786	4,280	4,286	4,702	5,127	5,317	6,155	6,608	6,652	8,587
Total Generation	**GWh**	**14,142**	**15,399**	**16,565**	**22,770**	**30,495**	**35,094**	**35,071**	**35,836**	**36,553**	**37,385**	**38,391**	**39,340**	**40,750**	**40,843**	**42,449**	**42,798**	**42,681**	**43,739**	**44,930**	**44,152**
Market Purchases	**GWh**	**63**	**243**	**578**	**587**	**330**	**291**	**873**	**825**	**827**	**818**	**792**	**752**	**454**	**747**	**419**	**487**	**793**	**665**	**415**	**843**
Market Sales	**GWh**	**1,975**	**1,530**	**1,026**	**1,120**	**2,478**	**2,327**	**1,345**	**1,268**	**1,240**	**1,244**	**1,336**	**1,457**	**1,756**	**1,359**	**1,799**	**1,570**	**1,184**	**1,367**	**1,474**	**495**
Net Generation *	**GWh**	**13,884**	**15,090**	**16,145**	**22,109**	**29,205**	**33,723**	**33,659**	**34,345**	**35,043**	**35,848**	**36,774**	**37,664**	**39,033**	**39,190**	**40,743**	**41,119**	**41,126**	**42,187**	**43,396**	**42,739**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-XED P3 APPP1 8760*
Future: *HEG*
Sensitivity: *Increased level of Economic Development*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	31.578	B$
20-Year Carbon Emissions	70.954	M Tons
20-Year Water Consumption	11.857	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	920	2,849	450	300	-	102	137	220	267	-	-	-	-	20	-	198	300
Wind	MW	-	-	-	800	-	-	-	234	60	136	32	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	705	1,257	335	641	-	-	-	-	-	-	-	-	-	-	-	-	-
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	146	-	146	146	-	146	292	146
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	120	480	80	-	-	-	80	120	-	80	160	160	240	120	120	240
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	100	100	100	-	200	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**2,697**	**4,372**	**1,429**	**1,046**	**461**	**289**	**300**	**356**	**412**	**171**	**106**	**337**	**331**	**283**	**290**	**635**	**711**

Portfolio Summary

Scenario Information

Scenario: *HEG-XmsnBW P3 8760*
Future: *HEG*
Sensitivity: *Blackwater DC Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.481	B$
20-Year Carbon Emissions	41.384	M Tons
20-Year Water Consumption	10.846	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.40	14.69	19.84	20.86	18.79	18.16	16.97	15.96	15.24	15.26	15.42	14.40	14.47	14.40	14.58
Carbon Intensity	lbs/MWh	394	403	389	319	335	282	200	201	201	200	153	159	147	154	158	149	134	118	101	-
Revenue Requirement	M$	541	605	736	1,280	1,326	1,432	1,421	1,545	1,591	1,637	1,610	1,630	1,653	1,704	1,790	2,061	2,231	2,346	2,774	3,574
Carbon Emission	k-tons	2,733	3,039	3,098	3,195	3,498	3,059	2,072	2,094	2,148	2,185	1,634	1,715	1,595	1,705	1,770	1,682	1,538	1,393	1,231	-
Water Consumption	k-gallons	587	626	644	635	663	477	307	303	636	640	584	586	581	597	555	535	535	515	482	356

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,638	2,763	3,084	3,168	3,274	3,400	3,441	3,461	3,441	3,571	3,639	3,625	3,613	3,581	3,570	3,703	3,084
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,474	1,474	1,485	1,555	1,555	1,555	1,555	1,555	1,555	1,249	1,249	999	999
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,095	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,407	2,621	2,575	2,345
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	280	400	400	400	400	440
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	300	300	300	300	300	300	300	300	300	300	300	300	300
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,020**	**8,281**	**8,981**	**8,896**	**9,346**	**9,601**	**9,679**	**9,795**	**9,800**	**9,955**	**10,090**	**10,126**	**10,356**	**10,138**	**10,457**	**10,557**	**9,346**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	7,430	7,915	8,849	9,118	9,398	9,770	9,890	9,963	9,897	10,274	10,471	10,456	10,357	10,323	10,165	9,514	8,622
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,975	4,962	5,034	5,009	5,182	5,443	5,422	5,425	5,423	5,441	4,617	4,248	4,028	3,443	3,431
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,133	1,140	1,172	371	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	93	105	69	92	165	68	80	70	79	24	30	23	23	11	9	7	7	7	-
Gas Combined Cycle	GWh	2,732	2,920	2,747	2,880	2,857	2,961	2,888	2,703	2,817	2,739	2,830	2,871	2,694	2,835	2,613	2,610	2,502	2,250	2,065	-
Gas/Hydrogen Turbine	GWh	625	983	1,094	1,215	1,635	2,048	1,258	1,408	1,423	1,524	629	725	666	651	441	308	265	193	149	5
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	125	807	792	637	651	528	171
Total Generation	**GWh**	**14,142**	**15,399**	**16,353**	**20,539**	**21,429**	**22,325**	**21,324**	**21,600**	**22,206**	**22,633**	**22,090**	**22,277**	**22,478**	**22,873**	**23,157**	**23,301**	**23,685**	**24,201**	**25,092**	**23,874**
Market Purchases	**GWh**	**63**	**243**	**470**	**402**	**353**	**243**	**781**	**822**	**695**	**612**	**2,333**	**2,426**	**2,485**	**2,504**	**2,562**	**2,888**	**2,975**	**2,962**	**2,828**	**3,398**
Market Sales	**GWh**	**1,975**	**1,530**	**1,159**	**1,228**	**1,386**	**1,782**	**1,049**	**973**	**1,143**	**1,153**	**2,119**	**2,074**	**2,006**	**2,043**	**2,166**	**2,409**	**2,644**	**2,881**	**3,361**	**2,430**
Net Generation *	**GWh**	**13,884**	**15,090**	**15,927**	**20,030**	**20,901**	**21,705**	**20,700**	**20,857**	**21,424**	**21,841**	**21,385**	**21,562**	**21,727**	**22,122**	**22,447**	**22,624**	**23,004**	**23,537**	**24,483**	**23,313**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-XmsnBW P3 8760*
Future: *HEG*
Sensitivity: *Blackwater DC Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.481	B$
20-Year Carbon Emissions	41.384	M Tons
20-Year Water Consumption	10.846	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	320	140	335	98	120	140	55	34	37	143	82	-	-	-	-	228	300
Wind	MW	-	-	-	800	-	-	-	16	-	114	70	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	131	311	-	-	-	-	-	-	-	-	-	-	1	214	223	220
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	240	120	-	-	-	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	300	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,615**	**317**	**711**	**123**	**462**	**267**	**196**	**129**	**61**	**168**	**148**	**271**	**291**	**171**	**384**	**768**	**878**

Portfolio Summary

Scenario Information

Scenario: *HEG-XmsnFC P3 8760*
Future: *HEG*
Sensitivity: *Four Corners Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.861	B$
20-Year Carbon Emissions	46.757	M Tons
20-Year Water Consumption	11.891	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.40	14.69	19.84	20.86	18.79	18.16	16.97	15.96	15.24	15.26	15.42	14.40	14.47	14.40	14.58
Carbon Intensity	lbs/MWh	394	403	389	319	335	282	200	201	201	200	200	199	199	199	199	200	183	164	136	-
Revenue Requirement	M$	541	605	736	1,280	1,326	1,432	1,421	1,545	1,591	1,637	1,697	1,726	1,749	1,807	1,883	2,147	2,319	2,441	2,852	3,752
Carbon Emission	k-tons	2,733	3,039	3,098	3,195	3,498	3,059	2,072	2,094	2,148	2,185	2,219	2,217	2,255	2,277	2,323	2,380	2,219	2,023	1,722	-
Water Consumption	k-gallons	587	626	644	635	663	477	307	303	636	639	656	655	665	682	652	673	665	643	637	445

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,638	2,763	3,084	3,168	3,274	3,400	3,441	3,461	3,441	3,571	3,639	3,625	3,613	3,581	3,570	3,703	3,084
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,474	1,474	1,485	1,555	1,555	1,555	1,555	1,555	1,555	1,249	1,249	999	999
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,095	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,407	2,621	2,575	2,345
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	280	400	400	400	400	440
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	300	300	300	300	300	300	300	300	300	300	300	300	300
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,020**	**8,281**	**8,981**	**8,896**	**9,346**	**9,601**	**9,679**	**9,795**	**9,800**	**9,955**	**10,090**	**10,126**	**10,356**	**10,138**	**10,457**	**10,557**	**9,346**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	7,430	7,915	8,849	9,117	9,399	9,770	9,890	9,963	9,898	10,273	10,471	10,454	10,356	10,322	10,161	9,510	8,616
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,975	4,962	5,033	5,009	5,182	5,443	5,421	5,425	5,422	5,440	4,617	4,248	4,028	3,443	3,431
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,133	1,140	1,172	371	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	93	105	69	92	165	68	80	70	79	77	80	102	77	41	24	15	13	8	-
Gas Combined Cycle	GWh	2,732	2,920	2,747	2,880	2,857	2,961	2,888	2,703	2,817	2,739	2,834	2,833	2,667	2,799	2,661	2,832	2,784	2,506	2,458	-
Gas/Hydrogen Turbine	GWh	625	983	1,094	1,215	1,635	2,048	1,258	1,408	1,423	1,524	1,516	1,512	1,657	1,485	913	714	599	494	292	64
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	197	1,322	1,582	1,439	1,410	1,060	855
Total Generation	**GWh**	**14,142**	**15,399**	**16,353**	**20,539**	**21,429**	**22,325**	**21,324**	**21,600**	**22,206**	**22,633**	**23,034**	**23,077**	**23,518**	**23,796**	**24,219**	**24,732**	**25,110**	**25,520**	**26,157**	**24,612**
Market Purchases	**GWh**	**63**	**243**	**470**	**402**	**353**	**243**	**781**	**822**	**695**	**613**	**575**	**703**	**661**	**727**	**642**	**512**	**475**	**397**	**242**	**1,253**
Market Sales	**GWh**	**1,975**	**1,530**	**1,159**	**1,228**	**1,386**	**1,782**	**1,049**	**973**	**1,143**	**1,152**	**1,199**	**1,057**	**1,113**	**1,062**	**1,122**	**1,244**	**1,339**	**1,390**	**1,561**	**727**
Net Generation *	**GWh**	**13,884**	**15,090**	**15,927**	**20,030**	**20,901**	**21,705**	**20,700**	**20,857**	**21,424**	**21,839**	**22,223**	**22,267**	**22,658**	**22,919**	**23,323**	**23,836**	**24,198**	**24,611**	**25,269**	**23,755**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-XmsnFC P3 8760*
Future: *HEG*
Sensitivity: *Four Corners Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.861	B$
20-Year Carbon Emissions	46.757	M Tons
20-Year Water Consumption	11.891	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	320	140	335	98	120	140	55	34	37	143	82	-	-	-	-	228	300
Wind	MW	-	-	-	800	-	-	-	16	-	114	70	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	131	311	-	-	-	-	-	-	-	-	-	-	1	214	223	220
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	240	120	-	-	-	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	300	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,615**	**317**	**711**	**123**	**462**	**267**	**196**	**129**	**61**	**168**	**148**	**271**	**291**	**171**	**384**	**768**	**878**

Portfolio Summary

Scenario Information

Scenario: *HEG-XmsnRS P3 8760*
Future: *HEG*
Sensitivity: *Rio Sol Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.465	B$
20-Year Carbon Emissions	48.227	M Tons
20-Year Water Consumption	11.302	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.40	14.69	19.84	20.86	18.79	18.16	16.97	15.96	15.24	15.26	15.42	14.40	14.47	14.40	14.58
Carbon Intensity	lbs/MWh	394	403	389	319	335	282	200	200	200	199	198	198	198	197	197	198	198	199	179	-
Revenue Requirement	M$	541	605	736	1,280	1,326	1,432	1,378	1,498	1,538	1,590	1,624	1,655	1,678	1,732	1,817	2,086	2,250	2,363	2,769	3,666
Carbon Emission	k-tons	2,733	3,039	3,098	3,195	3,498	3,060	2,071	2,092	2,147	2,184	2,218	2,215	2,254	2,276	2,320	2,379	2,471	2,575	2,402	-
Water Consumption	k-gallons	587	626	644	635	663	477	321	321	626	618	622	608	623	615	569	569	593	615	610	360

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,638	2,763	3,084	3,168	3,274	3,400	3,441	3,461	3,441	3,571	3,639	3,625	3,613	3,581	3,570	3,703	3,084
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,474	1,474	1,485	1,555	1,555	1,555	1,555	1,555	1,555	1,249	1,249	999	999
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,095	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,407	2,621	2,575	2,345
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	280	400	400	400	400	440
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	300	300	300	300	300	300	300	300	300	300	300	300	300
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,020**	**8,281**	**8,981**	**8,896**	**9,346**	**9,601**	**9,679**	**9,795**	**9,800**	**9,955**	**10,090**	**10,126**	**10,356**	**10,138**	**10,457**	**10,557**	**9,346**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	7,430	7,915	8,849	9,118	9,399	9,771	9,891	9,963	9,898	10,274	10,472	10,456	10,357	10,324	10,165	9,514	8,622
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,975	4,962	5,033	5,009	5,182	5,443	5,421	5,425	5,422	5,441	4,617	4,248	4,028	3,443	3,431
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,133	1,140	1,172	371	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	93	105	69	92	165	106	125	113	121	116	109	144	113	57	27	39	52	34	-
Gas Combined Cycle	GWh	2,732	2,920	2,747	2,880	2,857	2,961	2,914	2,727	2,857	2,769	2,867	2,845	2,685	2,825	2,625	2,787	2,823	2,733	2,784	-
Gas/Hydrogen Turbine	GWh	625	983	1,094	1,215	1,635	2,049	1,178	1,320	1,330	1,444	1,434	1,452	1,583	1,416	943	682	742	918	751	5
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	189	1,271	1,652	1,719	1,774	1,591	292
Total Generation	**GWh**	**14,142**	**15,399**	**16,353**	**20,539**	**21,429**	**22,326**	**21,309**	**21,582**	**22,196**	**22,624**	**23,025**	**23,058**	**23,505**	**23,783**	**24,182**	**24,730**	**25,599**	**26,578**	**27,503**	**23,996**
Market Purchases	**GWh**	**63**	**243**	**470**	**402**	**353**	**243**	**2,574**	**2,680**	**2,554**	**2,469**	**2,356**	**2,534**	**2,435**	**2,504**	**2,411**	**2,170**	**1,831**	**1,516**	**1,135**	**2,987**
Market Sales	**GWh**	**1,975**	**1,530**	**1,159**	**1,228**	**1,386**	**1,780**	**2,886**	**2,855**	**3,052**	**3,082**	**3,112**	**2,995**	**3,026**	**3,025**	**3,079**	**3,162**	**3,463**	**3,835**	**4,076**	**2,147**
Net Generation *	**GWh**	**13,884**	**15,090**	**15,927**	**20,030**	**20,901**	**21,702**	**20,745**	**20,881**	**21,475**	**21,913**	**22,356**	**22,374**	**22,797**	**23,104**	**23,511**	**24,095**	**24,967**	**25,937**	**26,890**	**23,442**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-XmsnRS P3 8760*
Future: *HEG*
Sensitivity: *Rio Sol Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.465	B$
20-Year Carbon Emissions	48.227	M Tons
20-Year Water Consumption	11.302	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	320	140	335	98	120	140	55	34	37	143	82	-	-	-	-	228	300
Wind	MW	-	-	-	800	-	-	-	16	-	114	70	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	131	311	-	-	-	-	-	-	-	-	-	-	1	214	223	220
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	240	120	-	-	-	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	300	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,615**	**317**	**711**	**123**	**462**	**267**	**196**	**129**	**61**	**168**	**148**	**271**	**291**	**171**	**384**	**768**	**878**

Portfolio Summary

Scenario Information

Scenario: *HEG-XmsnSZ P3 8760*
Future: *HEG*
Sensitivity: *SunZia Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.368	B$
20-Year Carbon Emissions	50.862	M Tons
20-Year Water Consumption	11.636	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,457	2,720	2,988	3,531	3,627	3,691	3,717	3,821	3,891	3,990	4,048	4,119	4,188	4,278	4,326	4,378	4,407	4,445	4,513	4,609
PRM	%	9.20	8.99	13.65	14.41	14.40	14.40	14.69	19.84	20.86	18.79	18.16	16.97	15.96	15.24	15.26	15.42	14.40	14.47	14.40	14.58
Carbon Intensity	lbs/MWh	394	403	402	369	384	342	200	200	200	199	198	198	198	197	197	197	198	198	187	-
Revenue Requirement	M$	541	605	728	1,241	1,281	1,353	1,381	1,499	1,538	1,593	1,628	1,661	1,685	1,740	1,826	2,095	2,260	2,371	2,776	3,677
Carbon Emission	k-tons	2,733	3,039	3,277	3,902	4,223	3,959	2,069	2,091	2,146	2,183	2,217	2,215	2,253	2,275	2,318	2,378	2,470	2,574	2,538	-
Water Consumption	k-gallons	587	626	682	737	802	646	323	324	631	623	616	603	610	609	556	549	573	593	597	351

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,638	2,763	3,084	3,168	3,274	3,400	3,441	3,461	3,441	3,571	3,639	3,625	3,613	3,581	3,570	3,703	3,084
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,474	1,474	1,485	1,555	1,555	1,555	1,555	1,555	1,555	1,249	1,249	999	999
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,964	2,095	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,406	2,407	2,621	2,575	2,345
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	280	400	400	400	400	440
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100
Long Duration Storage	MW	-	-	-	-	-	-	-	300	300	300	300	300	300	300	300	300	300	300	300	300
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**8,020**	**8,281**	**8,981**	**8,896**	**9,346**	**9,601**	**9,679**	**9,795**	**9,800**	**9,955**	**10,090**	**10,126**	**10,356**	**10,138**	**10,457**	**10,557**	**9,346**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,371	7,430	7,915	8,850	9,118	9,399	9,770	9,890	9,963	9,898	10,274	10,471	10,456	10,357	10,323	10,165	9,514	8,622
Wind	GWh	2,198	2,229	2,196	4,962	4,945	4,974	4,962	5,033	5,009	5,182	5,443	5,421	5,425	5,423	5,440	4,617	4,248	4,028	3,443	3,431
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,073	1,158	1,196	409	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	70	92	199	243	350	452	115	136	126	134	124	118	151	128	63	32	43	56	55	-
Gas Combined Cycle	GWh	2,732	2,920	2,887	3,003	2,963	3,222	2,893	2,719	2,844	2,748	2,862	2,841	2,679	2,830	2,604	2,757	2,798	2,748	2,821	-
Gas/Hydrogen Turbine	GWh	625	983	1,257	1,996	2,346	2,882	1,178	1,308	1,320	1,439	1,426	1,441	1,577	1,394	960	704	753	913	856	5
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	187	1,258	1,639	1,718	1,756	1,678	260
Total Generation	**GWh**	**14,142**	**15,399**	**16,690**	**21,635**	**22,529**	**23,744**	**21,297**	**21,573**	**22,186**	**22,613**	**23,020**	**23,052**	**23,500**	**23,778**	**24,170**	**24,714**	**25,588**	**26,573**	**27,753**	**23,963**
Market Purchases	**GWh**	**63**	**243**	**1,779**	**1,609**	**1,588**	**1,389**	**2,891**	**3,013**	**2,912**	**2,796**	**2,662**	**2,837**	**2,731**	**2,807**	**2,691**	**2,509**	**2,146**	**1,843**	**1,325**	**3,299**
Market Sales	**GWh**	**1,975**	**1,529**	**2,846**	**3,546**	**3,738**	**4,397**	**3,198**	**3,172**	**3,386**	**3,392**	**3,410**	**3,286**	**3,324**	**3,331**	**3,355**	**3,498**	**3,782**	**4,180**	**4,538**	**2,470**
Net Generation *	**GWh**	**13,884**	**15,090**	**16,305**	**21,141**	**22,018**	**23,174**	**20,739**	**20,865**	**21,450**	**21,896**	**22,347**	**22,361**	**22,799**	**23,107**	**23,508**	**24,092**	**24,970**	**25,954**	**27,163**	**23,452**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *HEG-XmsnSZ P3 8760*
Future: *HEG*
Sensitivity: *SunZia Transmission line included*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	16.368	B$
20-Year Carbon Emissions	50.862	M Tons
20-Year Water Consumption	11.636	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	320	140	335	98	120	140	55	34	37	143	82	-	-	-	-	228	300
Wind	MW	-	-	-	800	-	-	-	16	-	114	70	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	324	131	311	-	-	-	-	-	-	-	-	-	-	1	214	223	220
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	40	240	120	-	-	-	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	300	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,615**	**317**	**711**	**123**	**462**	**267**	**196**	**129**	**61**	**168**	**148**	**271**	**291**	**171**	**384**	**768**	**878**

Portfolio Summary

Scenario Information

Scenario: *LEG P2 8760*
Future: *LEG*
Sensitivity: *Low Economic Growth base case*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	10.802	B$
20-Year Carbon Emissions	35.040	M Tons
20-Year Water Consumption	6.353	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,069	2,159	2,274	2,722	2,788	2,858	2,847	2,903	2,920	2,965	2,968	2,979	2,988	3,017	3,010	3,009	2,982	2,964	2,966	3,001
PRM	%	27.46	34.80	46.28	43.73	40.37	39.46	40.71	38.73	38.65	36.77	37.25	37.20	37.53	36.92	30.86	24.09	19.53	14.99	14.40	14.65
Carbon Intensity	lbs/MWh	354	340	300	230	254	212	186	196	196	198	198	197	193	196	184	197	197	196	186	-
Revenue Requirement	M$	492	500	553	1,009	990	1,073	1,021	1,011	1,010	1,022	1,029	1,040	1,046	1,057	999	1,077	1,125	1,080	1,418	2,294
Carbon Emission	k-tons	2,326	2,354	2,125	1,965	2,243	1,925	1,686	1,783	1,785	1,794	1,786	1,772	1,723	1,749	1,619	1,654	1,597	1,612	1,540	-
Water Consumption	k-gallons	530	530	498	476	511	345	261	264	264	265	269	269	260	261	253	264	257	252	253	73

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	269	289	310	331	351	369	388	413	439	415	389	361	331	313	338
Solar	MW	1,775	2,025	2,266	2,408	2,394	2,530	2,515	2,501	2,487	2,473	2,459	2,403	2,389	2,376	2,361	2,349	2,318	2,561	2,766	2,121
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	1	2	5	7	8	9	9	10	10	10	12	14	16	17	18	20
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,313	1,894
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	872
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,777**	**7,736**	**8,233**	**8,042**	**8,050**	**8,059**	**7,963**	**7,969**	**7,931**	**7,943**	**7,955**	**7,751**	**7,715**	**7,352**	**7,566**	**7,742**	**6,423**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	535	588	638	691	742	795	845	905	965	925	872	820	767	747	797
Solar	GWh	4,895	5,574	6,350	6,757	6,840	7,238	7,216	7,151	7,116	7,076	7,046	6,878	6,839	6,798	6,771	6,684	6,651	7,227	6,785	5,803
Wind	GWh	2,197	2,226	2,193	4,960	4,945	4,975	4,962	4,981	4,956	4,738	4,756	4,737	4,741	4,738	4,754	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	1	3	8	11	13	14	15	15	16	16	18	19	21	22	22	22
Coal	GWh	1,090	1,073	1,073	1,073	1,073	359	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	2,342	2,254	2,334	3,582	7,042
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	24	19	3	2	4	14	13	21	17	15	16	20	18	13	19	20	13	23	12	-
Gas Combined Cycle	GWh	2,320	2,324	1,996	1,815	2,186	2,467	2,688	2,605	2,670	2,651	2,742	2,715	2,590	2,708	2,531	2,731	2,749	2,551	2,616	-
Gas/Hydrogen Turbine	GWh	332	411	302	174	365	802	841	1,049	1,010	1,044	967	958	968	934	845	753	652	807	550	63
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	140	106
Total Generation	**GWh**	**13,385**	**14,146**	**14,623**	**17,623**	**18,211**	**18,787**	**18,718**	**18,742**	**18,833**	**18,682**	**18,658**	**18,561**	**18,472**	**18,457**	**18,231**	**17,415**	**16,785**	**17,075**	**17,210**	**16,580**
Market Purchases	**GWh**	**6**	**6**	**16**	**25**	**18**	**48**	**24**	**35**	**31**	**41**	**47**	**54**	**71**	**103**	**131**	**351**	**562**	**572**	**432**	**928**
Market Sales	**GWh**	**2,762**	**2,918**	**2,847**	**2,634**	**2,600**	**2,692**	**2,497**	**2,458**	**2,502**	**2,299**	**2,252**	**2,118**	**2,026**	**1,951**	**1,781**	**1,257**	**930**	**1,176**	**1,189**	**1,105**
Net Generation *	**GWh**	**13,127**	**13,835**	**14,186**	**17,080**	**17,680**	**18,205**	**18,141**	**18,158**	**18,238**	**18,097**	**18,066**	**17,965**	**17,877**	**17,857**	**17,615**	**16,827**	**16,215**	**16,430**	**16,593**	**16,060**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *LEG P2 8760*
Future: *LEG*
Sensitivity: *Low Economic Growth base case*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	10.802	B$
20-Year Carbon Emissions	35.040	M Tons
20-Year Water Consumption	6.353	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	20	20	21	21	20	19	19	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	90	-	150	-	-	-	-	-	-	-	-	-	-	-	255	300	273
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	10	-	-	-	-	-	-	-	-	-	7	-	-	-	-	2
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	-	-	-	333	31
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	438
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,372**	**10**	**510**	**20**	**21**	**21**	**20**	**19**	**19**	**25**	**26**	**33**	**25**	**24**	**279**	**844**	**770**

Portfolio Summary

Scenario Information

Scenario: *LEG-CO2_400thru44 P2 8760*
Future: *LEG*
Sensitivity: *ETA 400 through 2044, zero CO2 by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	10.800	B$
20-Year Carbon Emissions	35.302	M Tons
20-Year Water Consumption	6.377	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,069	2,159	2,274	2,722	2,788	2,858	2,847	2,903	2,920	2,965	2,968	2,979	2,988	3,017	3,010	3,009	2,982	2,964	2,966	3,001
PRM	%	27.46	34.80	46.28	43.73	40.37	39.46	40.71	38.73	38.65	36.77	37.25	37.20	37.53	36.92	30.86	24.09	19.53	14.99	14.40	14.65
Carbon Intensity	lbs/MWh	354	340	300	230	254	212	186	196	196	202	198	201	193	199	184	200	207	196	186	-
Revenue Requirement	M$	492	500	553	1,009	990	1,073	1,021	1,011	1,010	1,022	1,029	1,040	1,046	1,057	999	1,077	1,123	1,080	1,418	2,294
Carbon Emission	k-tons	2,326	2,354	2,125	1,965	2,243	1,925	1,686	1,783	1,785	1,840	1,787	1,816	1,723	1,781	1,619	1,690	1,701	1,612	1,540	-
Water Consumption	k-gallons	530	530	498	476	511	345	261	264	264	268	269	273	260	263	253	268	268	252	253	73

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	269	289	310	331	351	369	388	413	439	415	389	361	331	313	338
Solar	MW	1,775	2,025	2,266	2,408	2,394	2,530	2,515	2,501	2,487	2,473	2,459	2,403	2,389	2,376	2,361	2,349	2,318	2,561	2,766	2,121
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	1	2	5	7	8	9	9	10	10	10	12	14	16	17	18	20
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,313	1,894
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	872
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,777**	**7,736**	**8,233**	**8,042**	**8,050**	**8,059**	**7,963**	**7,969**	**7,931**	**7,943**	**7,955**	**7,751**	**7,715**	**7,352**	**7,566**	**7,742**	**6,423**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	535	588	638	691	742	795	845	905	965	925	872	820	767	747	797
Solar	GWh	4,895	5,574	6,350	6,756	6,840	7,237	7,216	7,151	7,115	7,076	7,045	6,877	6,839	6,798	6,771	6,684	6,651	7,227	6,785	5,803
Wind	GWh	2,197	2,226	2,193	4,961	4,945	4,975	4,962	4,981	4,956	4,738	4,756	4,737	4,741	4,738	4,753	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	1	3	8	11	13	14	15	15	16	16	18	19	21	22	22	22
Coal	GWh	1,090	1,073	1,073	1,073	1,073	359	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	2,342	2,254	2,334	3,582	7,042
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	24	19	3	2	4	14	13	21	17	16	16	22	18	14	19	21	19	23	12	-
Gas Combined Cycle	GWh	2,320	2,324	1,996	1,815	2,186	2,467	2,688	2,605	2,670	2,672	2,742	2,744	2,590	2,723	2,531	2,746	2,820	2,551	2,616	-
Gas/Hydrogen Turbine	GWh	332	411	302	174	365	802	841	1,049	1,010	1,101	968	1,007	968	971	845	800	766	807	550	68
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	140	103
Total Generation	**GWh**	**13,385**	**14,146**	**14,623**	**17,623**	**18,211**	**18,787**	**18,718**	**18,742**	**18,833**	**18,762**	**18,659**	**18,641**	**18,472**	**18,510**	**18,231**	**17,478**	**16,974**	**17,075**	**17,210**	**16,583**
Market Purchases	**GWh**	**6**	**6**	**16**	**25**	**18**	**48**	**24**	**35**	**31**	**32**	**47**	**44**	**71**	**94**	**131**	**327**	**472**	**572**	**432**	**926**
Market Sales	**GWh**	**2,762**	**2,918**	**2,847**	**2,634**	**2,600**	**2,692**	**2,497**	**2,458**	**2,502**	**2,371**	**2,253**	**2,191**	**2,026**	**1,997**	**1,781**	**1,293**	**1,030**	**1,176**	**1,189**	**1,105**
Net Generation *	**GWh**	**13,127**	**13,835**	**14,186**	**17,080**	**17,680**	**18,205**	**18,141**	**18,158**	**18,238**	**18,178**	**18,067**	**18,047**	**17,877**	**17,912**	**17,615**	**16,888**	**16,404**	**16,430**	**16,593**	**16,063**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *LEG-CO2_400thru44 P2 8760*
Future: *LEG*
Sensitivity: *ETA 400 through 2044, zero CO2 by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	10.800	B$
20-Year Carbon Emissions	35.302	M Tons
20-Year Water Consumption	6.377	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	20	20	21	21	20	19	19	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	90	-	150	-	-	-	-	-	-	-	-	-	-	-	255	300	273
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	10	-	-	-	-	-	-	-	-	-	7	-	-	-	-	2
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	-	-	-	333	31
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	438
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,372**	**10**	**510**	**20**	**21**	**21**	**20**	**19**	**19**	**25**	**26**	**33**	**25**	**24**	**279**	**844**	**770**

Portfolio Summary

Scenario Information

Scenario: *LEG-NoETA P2 8760*
Future: *LEG*
Sensitivity: *No CO2 emission limits, No RPS, No CO2 free by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	10.485	B$
20-Year Carbon Emissions	37.261	M Tons
20-Year Water Consumption	6.585	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,069	2,159	2,274	2,722	2,788	2,858	2,847	2,903	2,920	2,965	2,968	2,979	2,988	3,017	3,010	3,009	2,982	2,964	2,966	3,001
PRM	%	27.46	34.80	46.28	43.73	40.37	39.46	40.71	38.73	38.65	36.77	37.25	37.20	37.43	36.72	30.66	27.46	26.53	25.77	17.13	14.65
Carbon Intensity	lbs/MWh	354	340	300	230	254	212	186	196	196	202	198	201	193	200	184	201	208	194	225	214
Revenue Requirement	M$	492	500	553	1,009	986	1,069	1,018	1,008	1,007	1,018	1,026	1,037	1,043	1,053	998	1,076	1,122	1,082	1,196	1,481
Carbon Emission	k-tons	2,326	2,354	2,125	1,965	2,244	1,925	1,686	1,783	1,785	1,840	1,787	1,816	1,726	1,787	1,623	1,695	1,705	1,598	1,784	1,707
Water Consumption	k-gallons	530	530	498	476	511	345	261	264	264	268	269	273	260	263	253	268	268	250	272	262

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	269	289	310	331	351	369	388	407	427	403	378	349	319	301	326
Solar	MW	1,775	2,025	2,266	2,408	2,394	2,530	2,515	2,501	2,487	2,473	2,459	2,403	2,389	2,376	2,361	2,349	2,318	2,600	2,805	2,187
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	1	2	5	7	8	9	9	10	10	10	12	14	16	17	18	18
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	1,980	1,798
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	487
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,777**	**7,736**	**8,233**	**8,042**	**8,050**	**8,059**	**7,963**	**7,969**	**7,931**	**7,937**	**7,944**	**7,739**	**7,703**	**7,340**	**7,593**	**7,250**	**6,475**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	535	588	638	691	742	795	845	896	947	907	854	802	749	728	779
Solar	GWh	4,895	5,574	6,350	6,756	6,839	7,237	7,216	7,151	7,116	7,076	7,046	6,877	6,839	6,798	6,771	6,684	6,651	7,338	6,897	6,011
Wind	GWh	2,197	2,226	2,193	4,961	4,945	4,975	4,962	4,981	4,956	4,738	4,756	4,737	4,741	4,738	4,753	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	1	3	8	11	13	14	15	15	16	16	18	19	21	22	22	22
Coal	GWh	1,090	1,073	1,073	1,073	1,073	359	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	2,342	2,254	2,334	2,342	3,332
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	24	19	3	2	4	14	13	21	17	16	16	22	18	14	19	22	19	23	32	-
Gas Combined Cycle	GWh	2,320	2,324	1,996	1,815	2,186	2,467	2,688	2,605	2,670	2,672	2,742	2,744	2,592	2,726	2,533	2,748	2,822	2,534	2,755	2,633
Gas/Hydrogen Turbine	GWh	332	411	302	174	365	802	841	1,049	1,010	1,101	968	1,007	972	978	851	805	771	797	929	934
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Generation	**GWh**	**13,385**	**14,146**	**14,623**	**17,623**	**18,211**	**18,787**	**18,718**	**18,742**	**18,833**	**18,762**	**18,659**	**18,641**	**18,468**	**18,503**	**18,221**	**17,468**	**16,964**	**17,140**	**16,461**	**16,458**
Market Purchases	**GWh**	**6**	**6**	**16**	**25**	**18**	**48**	**24**	**35**	**31**	**32**	**47**	**44**	**71**	**95**	**133**	**331**	**476**	**561**	**852**	**809**
Market Sales	**GWh**	**2,762**	**2,918**	**2,847**	**2,634**	**2,600**	**2,692**	**2,497**	**2,458**	**2,502**	**2,371**	**2,253**	**2,191**	**2,023**	**1,992**	**1,774**	**1,287**	**1,024**	**1,222**	**894**	**911**
Net Generation *	**GWh**	**13,127**	**13,835**	**14,186**	**17,080**	**17,680**	**18,205**	**18,141**	**18,158**	**18,238**	**18,178**	**18,067**	**18,047**	**17,874**	**17,906**	**17,606**	**16,878**	**16,395**	**16,486**	**15,879**	**15,986**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *LEG-NoETA P2 8760*
Future: *LEG*
Sensitivity: *No CO2 emission limits, No RPS, No CO2 free by 2045*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	10.485	B$
20-Year Carbon Emissions	37.261	M Tons
20-Year Water Consumption	6.585	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	20	20	21	21	20	19	19	19	20	26	25	24	24	25	25
Solar	MW	-	-	-	90	-	150	-	-	-	-	-	-	-	-	-	-	-	294	300	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	10	-	-	-	-	-	-	-	-	-	7	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	-	-	-	-	268
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,372**	**10**	**510**	**20**	**21**	**21**	**20**	**19**	**19**	**19**	**20**	**33**	**25**	**24**	**318**	**325**	**739**

Portfolio Summary

Scenario Information

Scenario: *LEG-SS ETA Step Down 8760*
Future: *LEG*
Sensitivity: *Smooth out' the acquisition of new clean firm resources*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	11.233	B$
20-Year Carbon Emissions	26.995	M Tons
20-Year Water Consumption	5.495	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,069	2,159	2,274	2,722	2,788	2,858	2,847	2,903	2,920	2,965	2,968	2,979	2,988	3,017	3,010	3,009	2,982	2,964	2,966	3,001
PRM	%	27.46	34.80	46.28	43.73	40.37	39.46	40.71	38.73	38.65	36.77	37.25	37.20	37.53	37.16	31.10	34.01	29.76	27.08	19.71	14.65
Carbon Intensity	lbs/MWh	354	340	300	230	254	212	186	196	196	154	153	153	108	108	108	64	64	65	65	-
Revenue Requirement	M$	492	500	553	1,009	990	1,073	1,021	1,011	1,010	1,038	1,046	1,059	1,098	1,117	1,044	1,371	1,404	1,400	1,579	2,237
Carbon Emission	k-tons	2,326	2,354	2,125	1,965	2,243	1,925	1,686	1,783	1,785	1,325	1,318	1,308	878	885	890	554	543	559	541	-
Water Consumption	k-gallons	530	530	498	476	511	345	261	264	264	224	225	222	162	164	167	143	141	142	153	73

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	269	289	310	331	351	369	388	413	439	415	389	361	331	313	338
Solar	MW	1,775	2,025	2,266	2,408	2,394	2,530	2,515	2,501	2,487	2,473	2,459	2,403	2,389	2,463	2,448	2,436	2,465	2,753	2,696	2,078
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	1	2	5	7	8	9	9	10	10	10	12	14	16	17	18	20
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,419	2,149	1,905
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	580	580	580	726	872
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,777**	**7,736**	**8,233**	**8,042**	**8,050**	**8,059**	**7,963**	**7,969**	**7,931**	**7,943**	**8,043**	**7,838**	**8,095**	**7,791**	**8,220**	**7,760**	**6,391**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	535	588	638	691	742	795	845	905	965	925	872	820	767	747	797
Solar	GWh	4,895	5,574	6,349	6,757	6,840	7,237	7,216	7,151	7,116	7,078	7,046	6,878	6,840	7,053	7,027	6,928	7,071	7,726	6,563	5,682
Wind	GWh	2,197	2,226	2,194	4,960	4,945	4,975	4,962	4,981	4,956	4,738	4,756	4,737	4,741	4,739	4,753	3,932	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	1	3	8	11	13	14	15	15	16	16	18	19	21	22	22	22
Coal	GWh	1,090	1,073	1,073	1,073	1,073	359	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	4,816	4,728	4,807	6,063	7,042
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	24	19	3	2	4	14	13	21	17	7	8	7	1	1	2	0	0	1	1	-
Gas Combined Cycle	GWh	2,320	2,324	1,996	1,815	2,186	2,467	2,688	2,605	2,670	2,367	2,437	2,430	1,863	1,897	1,903	1,280	1,257	1,274	1,236	-
Gas/Hydrogen Turbine	GWh	332	411	302	174	365	802	841	1,049	1,010	492	427	415	115	104	105	9	9	18	20	66
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	108
Total Generation	**GWh**	**13,385**	**14,146**	**14,623**	**17,623**	**18,211**	**18,787**	**18,718**	**18,742**	**18,833**	**17,840**	**17,805**	**17,721**	**16,875**	**17,060**	**17,102**	**17,916**	**17,530**	**17,959**	**17,407**	**16,465**
Market Purchases	**GWh**	**6**	**6**	**16**	**25**	**18**	**48**	**24**	**35**	**31**	**212**	**248**	**271**	**649**	**639**	**584**	**325**	**433**	**424**	**488**	**963**
Market Sales	**GWh**	**2,762**	**2,918**	**2,847**	**2,634**	**2,600**	**2,692**	**2,497**	**2,458**	**2,502**	**1,621**	**1,592**	**1,495**	**1,013**	**1,070**	**1,089**	**1,655**	**1,447**	**1,826**	**1,430**	**1,028**
Net Generation *	**GWh**	**13,127**	**13,835**	**14,186**	**17,080**	**17,680**	**18,205**	**18,141**	**18,158**	**18,238**	**17,247**	**17,205**	**17,125**	**16,285**	**16,439**	**16,470**	**17,252**	**16,860**	**17,228**	**16,779**	**15,949**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *LEG-SS ETA Step Down 8760*
Future: *LEG*
Sensitivity: *Smooth out' the acquisition of new clean firm resources*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	11.233	B$
20-Year Carbon Emissions	26.995	M Tons
20-Year Water Consumption	5.495	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	20	20	21	21	20	19	19	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	90	-	150	-	-	-	-	-	-	-	87	-	-	60	300	38	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	10	-	-	-	-	-	-	-	-	-	7	-	-	-	-	2
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	-	-	169	-	206
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	292	-	-	146	146
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,372**	**10**	**510**	**20**	**21**	**21**	**20**	**19**	**19**	**25**	**113**	**33**	**317**	**83**	**493**	**209**	**720**

Portfolio Summary

Scenario Information

Scenario: *LEG-TOU P2 8760*
Future: *LEG*
Sensitivity: *Time Of Use forecast impact to LEG*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	10.766	B$
20-Year Carbon Emissions	34.957	M Tons
20-Year Water Consumption	6.350	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,070	2,159	2,274	2,722	2,795	2,862	2,843	2,891	2,897	2,937	2,930	2,931	2,926	2,941	2,918	2,916	2,909	2,910	2,929	2,972
PRM	%	27.46	34.79	46.28	43.73	40.00	39.26	40.95	39.32	39.72	38.09	39.03	39.48	40.41	40.45	35.02	28.05	22.55	16.96	14.40	14.65
Carbon Intensity	lbs/MWh	354	340	300	230	253	210	185	195	194	198	196	197	191	196	183	197	197	198	190	-
Revenue Requirement	M$	492	500	553	1,009	988	1,071	1,018	1,008	1,007	1,019	1,026	1,037	1,043	1,053	995	1,073	1,120	1,071	1,392	2,280
Carbon Emission	k-tons	2,326	2,354	2,125	1,965	2,233	1,913	1,674	1,769	1,770	1,794	1,772	1,772	1,708	1,749	1,606	1,654	1,596	1,612	1,565	-
Water Consumption	k-gallons	530	530	498	476	510	344	259	262	263	265	268	269	259	261	252	265	257	253	256	74

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	269	289	310	331	351	369	388	413	439	415	389	361	331	313	338
Solar	MW	1,775	2,025	2,266	2,408	2,394	2,530	2,515	2,501	2,487	2,473	2,459	2,403	2,389	2,376	2,361	2,349	2,318	2,494	2,699	2,071
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	1	2	5	7	8	9	9	10	10	10	12	14	16	17	18	18
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	1,864
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	872
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	40
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,777**	**7,736**	**8,233**	**8,042**	**8,050**	**8,059**	**7,963**	**7,969**	**7,931**	**7,943**	**7,955**	**7,751**	**7,715**	**7,352**	**7,499**	**7,612**	**6,340**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	535	588	638	691	742	795	845	905	965	925	872	820	767	747	797
Solar	GWh	4,895	5,573	6,349	6,756	6,839	7,237	7,216	7,151	7,115	7,076	7,045	6,878	6,839	6,798	6,771	6,684	6,651	7,037	6,592	5,660
Wind	GWh	2,197	2,227	2,193	4,961	4,945	4,975	4,962	4,981	4,956	4,738	4,757	4,737	4,741	4,738	4,753	3,933	3,564	3,344	2,756	2,747
Demand Response	GWh	29	29	29	29	1	3	8	11	13	14	15	15	16	16	18	19	21	22	22	22
Coal	GWh	1,090	1,073	1,073	1,073	1,073	359	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	2,342	2,254	2,334	3,582	7,042
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	24	19	3	2	4	14	12	20	16	15	15	21	17	13	18	20	13	23	13	-
Gas Combined Cycle	GWh	2,320	2,323	1,996	1,815	2,178	2,462	2,682	2,600	2,664	2,654	2,735	2,714	2,584	2,708	2,526	2,730	2,746	2,569	2,643	-
Gas/Hydrogen Turbine	GWh	332	411	302	174	353	787	826	1,030	992	1,041	951	958	949	933	829	755	655	795	568	72
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	142	105
Total Generation	**GWh**	**13,385**	**14,145**	**14,623**	**17,623**	**18,192**	**18,765**	**18,696**	**18,717**	**18,808**	**18,682**	**18,633**	**18,561**	**18,445**	**18,456**	**18,209**	**17,415**	**16,783**	**16,890**	**17,065**	**16,445**
Market Purchases	**GWh**	**6**	**6**	**16**	**25**	**18**	**48**	**23**	**34**	**30**	**38**	**45**	**49**	**68**	**94**	**126**	**331**	**536**	**599**	**457**	**948**
Market Sales	**GWh**	**2,762**	**2,918**	**2,847**	**2,634**	**2,611**	**2,702**	**2,508**	**2,468**	**2,512**	**2,335**	**2,266**	**2,156**	**2,041**	**1,989**	**1,800**	**1,282**	**953**	**1,087**	**1,144**	**1,052**
Net Generation *	**GWh**	**13,126**	**13,835**	**14,185**	**17,079**	**17,660**	**18,184**	**18,119**	**18,133**	**18,213**	**18,097**	**18,042**	**17,967**	**17,851**	**17,858**	**17,593**	**16,825**	**16,214**	**16,261**	**16,470**	**15,934**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *LEG-TOU P2 8760*
Future: *LEG*
Sensitivity: *Smooth out' the acquisition of new clean firm resources*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	10.766	B$
20-Year Carbon Emissions	34.957	M Tons
20-Year Water Consumption	6.350	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	20	20	21	21	20	19	19	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	90	-	150	-	-	-	-	-	-	-	-	-	-	-	188	300	289
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	10	-	-	-	-	-	-	-	-	-	7	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	-	-	-	-	270	64
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	438
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,372**	**10**	**510**	**20**	**21**	**21**	**20**	**19**	**19**	**25**	**26**	**33**	**25**	**24**	**212**	**781**	**816**

APPENDIX O: MOST COST EFFECTIVE PORTFOLIO

This appendix provides a Portfolio Capacity Report and Capacity Expansion Report for the Most Cost Effective Portfolio.

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Portfolio Summary

Scenario Information

Scenario: *CTP P2 8760*
Future: *CTP*
Sensitivity: *Current Trends & Policies base case*

Cost & Environmental Metrics

20-Year NPV Revenue Requirement	14.327	B$
20-Year Carbon Emissions	42.055	M Tons
20-Year Water Consumption	7.292	M Gallons

Key Annual Metrics

Metric	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Peak Load	MW	2,293	2,528	2,785	3,282	3,347	3,381	3,378	3,451	3,489	3,557	3,584	3,620	3,650	3,700	3,711	3,726	3,715	3,722	3,753	3,814
PRM	%	15.05	15.10	19.43	19.32	17.72	18.81	19.81	20.88	20.28	18.37	18.16	17.62	17.25	16.38	14.40	14.40	14.40	14.48	14.40	14.60
Carbon Intensity	lbs/MWh	381	392	371	313	334	293	199	199	199	198	198	198	197	197	197	198	170	149	122	-
Revenue Requirement	M$	523	572	693	1,197	1,205	1,288	1,273	1,315	1,319	1,356	1,371	1,395	1,405	1,436	1,448	1,684	1,854	1,947	2,322	3,146
Carbon Emission	k-tons	2,602	2,912	2,892	3,000	3,315	2,975	1,902	1,915	1,927	1,931	1,947	1,965	1,963	1,991	2,017	2,069	1,795	1,595	1,340	-
Water Consumption	k-gallons	569	610	616	610	647	466	293	287	287	287	286	287	285	282	270	293	279	264	267	109

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	3	62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	51	100	153	207	249	274	299	326	352	378	403	427	452	478	454	428	400	369	352	377
Solar	MW	1,775	2,025	2,266	2,447	2,483	2,619	2,679	2,776	2,779	2,858	2,910	2,947	2,956	3,068	3,053	3,041	3,010	2,998	3,059	2,440
Wind	MW	658	658	658	1,458	1,458	1,458	1,458	1,458	1,458	1,356	1,356	1,356	1,356	1,356	1,356	1,356	1,050	1,050	800	800
Demand Response	MW	70	70	70	70	32	35	40	42	44	45	45	46	47	47	49	51	52	52	52	52
Short Duration Storage	MW	992	1,160	1,640	1,950	1,950	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,250	2,285	2,392	2,428	2,580	2,462	2,248
Coal	MW	200	200	200	200	200	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	288	288	288	288	288	288	288	288	288	288	288	288	288	288	288	434	580	726	1,018	1,310
Geothermal	MW	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	11	-	-
Gas Steam Generator	MW	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146	-
Gas Combined Cycle	MW	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	425	-
Gas/Hydrogen Turbine	MW	431	431	598	614	614	654	654	654	654	654	654	654	654	654	487	487	487	487	487	338
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	160	160	160	160	160
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100
Total Capacity	**MW**	**5,049**	**5,576**	**6,454**	**7,816**	**7,857**	**8,360**	**8,251**	**8,476**	**8,508**	**8,512**	**8,588**	**8,651**	**8,685**	**8,824**	**8,775**	**9,032**	**8,849**	**9,105**	**9,060**	**7,826**

Annual Generation by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	GWh	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	GWh	103	205	308	411	485	543	605	664	725	785	848	907	966	1,027	987	934	882	829	809	859
Solar	GWh	4,898	5,582	6,370	6,876	7,101	7,498	7,693	7,951	7,964	8,197	8,358	8,462	8,487	8,809	8,788	8,695	8,661	8,497	7,632	6,740
Wind	GWh	2,198	2,229	2,197	4,962	4,946	4,974	4,962	4,980	4,956	4,738	4,756	4,736	4,741	4,738	4,753	3,933	3,564	3,343	2,756	2,747
Demand Response	GWh	29	29	29	29	14	18	24	28	30	31	32	32	33	33	34	34	34	34	34	34
Coal	GWh	1,090	1,073	1,109	1,139	1,171	395	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	GWh	2,335	2,225	2,309	2,342	2,254	2,334	2,342	2,225	2,302	2,342	2,261	2,334	2,335	2,225	2,309	3,579	4,728	6,044	8,543	10,753
Geothermal	GWh	60	61	61	61	60	61	61	61	60	61	61	61	60	61	61	61	60	0	-	-
Gas Steam Generator	GWh	55	80	81	36	68	127	48	56	47	49	36	41	54	43	40	30	10	8	7	-
Gas Combined Cycle	GWh	2,608	2,823	2,677	2,815	2,846	3,000	2,876	2,701	2,801	2,726	2,813	2,792	2,657	2,753	2,641	2,835	2,722	2,455	2,340	-
Gas/Hydrogen Turbine	GWh	525	866	891	991	1,385	1,894	1,014	1,150	1,109	1,169	1,151	1,189	1,262	1,249	972	859	588	475	251	72
Advanced Generator	GWh	-	-	-	-	-	-	-	-	-	-	-	-	-	-	573	672	572	533	374	363
Total Generation	**GWh**	**13,902**	**15,173**	**16,032**	**19,662**	**20,329**	**20,843**	**19,624**	**19,814**	**19,994**	**20,098**	**20,316**	**20,553**	**20,595**	**20,937**	**21,157**	**21,630**	**21,820**	**22,218**	**22,746**	**21,568**
Market Purchases	**GWh**	**40**	**119**	**316**	**302**	**268**	**234**	**748**	**768**	**752**	**748**	**755**	**708**	**745**	**719**	**649**	**447**	**397**	**287**	**132**	**635**
Market Sales	**GWh**	**2,201**	**1,867**	**1,424**	**1,336**	**1,497**	**1,790**	**944**	**978**	**1,015**	**936**	**997**	**1,000**	**964**	**1,043**	**1,096**	**1,268**	**1,347**	**1,523**	**1,795**	**1,027**
Net Generation *	**GWh**	**13,643**	**14,864**	**15,601**	**19,170**	**19,841**	**20,312**	**19,080**	**19,228**	**19,402**	**19,498**	**19,690**	**19,892**	**19,940**	**20,245**	**20,440**	**20,892**	**21,066**	**21,448**	**22,013**	**20,896**

* Adjusted for Energy Storage Losses

Capacity Expansion Plan

Scenario Information

Scenario: *CTP P2 8760*
Future: *CTP*
Sensitivity: *Current Trends & Policies base case*

Cost & Environmental Metrics

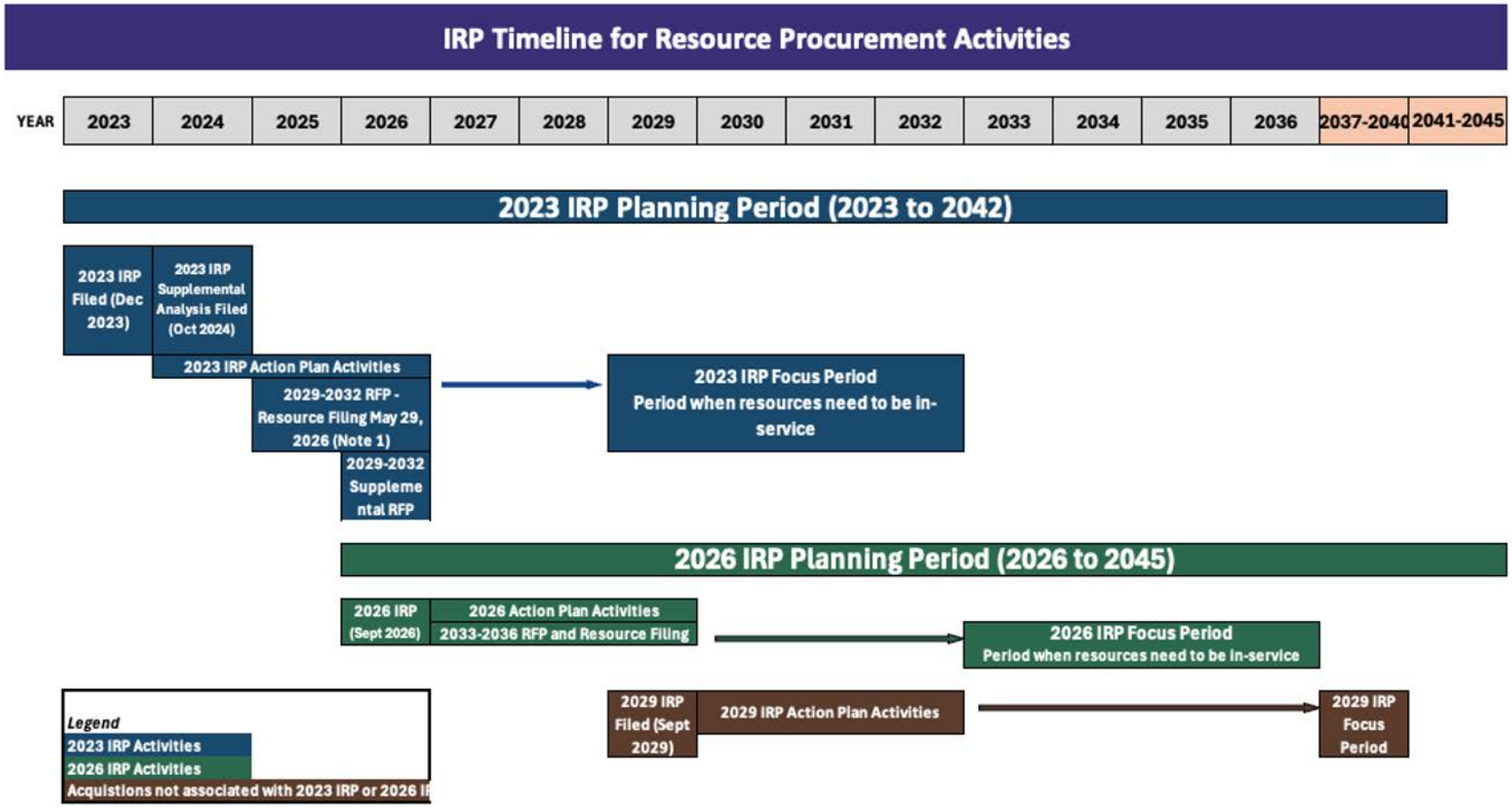
20-Year NPV Revenue Requirement	14.327	B$
20-Year Carbon Emissions	42.055	M Tons
20-Year Water Consumption	7.292	M Gallons

Installed Capacity by Resource Type

Resource Type	Unit	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Capacity Purchases	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Energy Efficency	MW	-	-	-	-	-	25	25	26	27	26	24	25	25	26	26	25	24	24	25	25
Solar	MW	-	-	-	129	51	150	74	111	17	93	66	94	23	125	-	-	-	-	155	300
Wind	MW	-	-	-	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Demand Response	MW	-	-	-	-	46	-	-	-	-	2	-	-	-	-	4	-	-	-	-	-
Short Duration Storage	MW	-	-	-	310	-	300	-	-	-	-	-	-	-	-	35	107	36	152	151	237
Coal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuclear	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146	146	146	292	292
Geothermal	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Steam Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Combined Cycle	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas/Hydrogen Turbine	MW	-	-	-	172	-	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Advanced Generator	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	120	40	-	-	-	-
Pumped Hydro	MW	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Duration Storage	MW	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
Total Capacity	**MW**	**-**	**-**	**-**	**1,411**	**97**	**515**	**99**	**237**	**44**	**121**	**90**	**118**	**47**	**151**	**186**	**317**	**206**	**322**	**623**	**854**

APPENDIX P: IRP TIMELINE AND PROCUREMENT TIMEFRAMES

IRP Planning, Action Plan And Focus Period Timeline



Notes:

1: 800 MW Wind (Palomas), 610 MW BESS (Cathills 150 MW, Wildcat 50 MW, Gila Monster 150 MW, TAG II 90 MW, Britton 60 MW, Encino 110 MW), 240 MW Solar (Cat Hills 150 MW, Wildcat 90 MW), 186 MW Gas (Reeves Ext 146 MW, La Luz II 40 MW).

2: (50-250 MW Firm Dispatchable (modeled as 172 MW gas in 2026 IRP as proxy pending the Supplemental RFP outcome).

PROCUREMENT TIMEFRAMES

2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037-2040	2041-2045

Existing Resources in 2026 IRP	Pending Near-Term Procurements	2026 IRP Focus Period Procurements	Thru end of Planning Period
Planning Period			

Existing and Approved Resources		2029-2032 Resources	2033-2036 RFP	Future IRP/RFP cycles
All In-service resources by 2026	Resources approved in 2025 with 2027 and 2028 in-service dates (Note 1)	2029-2032 Resource Filing (Note 2) and Supplemental Resource Filing (Note 3) Commercial Operation	Resources aquired by 2026 IRP action plan RFP covering 2033 to 2036 focus period.	Resource additions beyond 2026 IRP focus period.

Legend

2023 IRP Activities

2026 IRP Activities

Activities not associated with 2023 IRP or 2026 IRP

Notes:

Note 1 - Valencia Extension (167 MW), Corazon BESS (150 MW), Sun Lasso BESS (150 MW), Sunbelt Solar (100 MW), Sunbelt BESS (50 MW), Four Mile Mesa Solar (100 MW), Starlight Solar(100 MW), Windy Lane Solar (90 MW), Four Mile Mesa BESS (100 MW), Starlight BESS (100 MW), Windy Lane BESS (68 MW)

Note 2: 800 MW Wind (Palomas), 610 MW BESS (Cathills 150 MW, Wildcat 50 MW, Gila Monster 150 MW, TAG II 90 MW, Britton 60 MW, Encino 110 MW), 240 MW Solar (Cat Hills 150 MW, Wildcat 90 MW), 186 MW Gas (Reeves Ext 146 MW, La Luz II 40 MW).

Note 3: 50-250 MW of new Firm Dispatchable Resources, pending final award of resource(s) from PNM's 2029-2032 All-Source Generation Resources RFP Supplement. For the IRP this was modeled as a 172 MW combustion turbine as a proxy.

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE PUBLIC SERVICE COMPANY OF NEW MEXICO'S 2026 INTERGRATED RESOURCE PLAN	)	**Case No. 25-00022-UT**
PUBLIC SERVICE COMPANY OF NEW MEXICO,	)	
APPLICANT.	)	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **Public Service Company of New Mexico's Integrated Resource Plan for the Period 2026-2045, Docket 25-00022-UT** was emailed to parties listed below on September 1, 2026:

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