

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

IN THE MATTER OF REQUEST FOR APPROVAL OF )  
GENERAL RATE ADJUSTMENT PURSUANT TO 17.9.540, ) Case No. 21-00318-UT  
JEMEZ MOUNTAINS ELECTRIC COOPERATIVE, INC., )  
PETITIONER. )

**NEW ENERGY ECONOMY’S REQUEST FOR INTERVENTION**  
**ON BEHALF OF JEMEZ MOUNTAINS ELECTRIC COOPERATIVE**  
**RATEPAYERS & OTHER ORGANIZATIONS**  
**IN OPPOSITION TO THE RATE INCREASE REQUEST BY**  
**JEMEZ MOUNTAINS ELECTRIC COOPERATIVE, INC.**

COMES NOW New Energy Economy (NEE), by and through its attorney Mariel Nanasi, pursuant to 1.2.2.10, 1.2.2.23(A), 1.2.2.25(H)(3) and 17.9.540 NMAC, moves the New Mexico Public Regulation Commission (“PRC” or “Commission”) for leave to intervene and for expansion of the service list, and requests each party hereto to serve all discovery requests and responses on undersigned counsel in this proceeding. In support of this Motion, New Energy Economy states:

1. Jemez Mountains Electric Cooperative, Inc. (“JMEC”) member ratepayer protesters have met the requirements set forth in 17.9.540.11 NMAC.
2. The subject matter of this proceeding and its outcome will have an impact on New Energy Economy (“NEE”), its constituents, and with particularity, JMEC member ratepayer protesters, some, but not all of whom, were named in the original Protest to the Commission filed on January 18, 2022; other JMEC individuals member ratepayers and organizations will also be affected by the results of this case.
3. New Energy Economy, on behalf of persons and organizations identified below,

state that they are retail service customers of JMEC and are affected by JMEC's request to raise electric rates, and/or are advocates of responsible and transparent governance policies, and climate and economic justice.

- i. JMEC member ratepayers: Loyda Martinez,<sup>1</sup> Glibert Sanchez,<sup>2</sup> Tom Engel,<sup>3</sup> Saraswati Kaur Khalsa,<sup>4</sup> Trenton DeVore,<sup>5</sup> Theodor G. Roybal,<sup>6</sup> Sara Duke & Charles King,<sup>7</sup> Bruce David & Marsha Rinkman,<sup>8</sup> Marc Steiner,<sup>9</sup> and Florence P. Jaramillo.<sup>10</sup> Three of the preceding listed individuals were part of the original group of protesters.<sup>11</sup>
- ii. **Daniel Earnest Tso**, Navajo Nation Council Delegate, Chair, HEHSC, 24<sup>th</sup> Navajo Nation.
- iii. **Hispano Round Table de Nuevo México**: seeks advancement of education, employment, economic development, environmental justice, civil rights, and social justice for Hispanic Americans. The Hispano Roundtable of New Mexico is a coalition of over 50 Hispano/Latino organizations with over 50,000 members tied to our coalition. Our member organizations are comprised of local, state & national organizations.
- iv. **Honor Our Pueblo Existence (HOPE)**: is a community-based organization located

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<sup>1</sup> P.O. Box 1760, Santa Cruz, 87567

<sup>2</sup> #38 SR 30 LA Highway, Pajarito.

<sup>3</sup> 29 Private Drive 1433, Santa Cruz, 87567

<sup>4</sup> 27 N. Terrace Farm Rd, Espanola, 87532

<sup>5</sup> 11 Antelope Hill Rd, Jemez Pueblo, 87024

<sup>6</sup> 17 CR 7, Espanola, 87532

<sup>7</sup> #48 CR 100, Chimayo, 87522

<sup>8</sup> P.O. Box 30, 87537

<sup>9</sup> 136 Sunset Dr., Espanola, 87532

<sup>10</sup> 300 Juan Medina Rd. Chimayo, 87522 (Rancho de Chimayo Restaurant)

<sup>11</sup> Ms. Martinez, Mr. Engel and Ms. Khalsa.

- at Santa Clara Pueblo that addresses environmental and health issues and promotes sustainability and traditional life ways.
- v. **Indigenous Life Ways, Inc.:** is an indigenous-focused organization that facilitates opportunities for individuals and community groups to utilize traditional knowledge, ceremonies, and a deep understanding of our communities to continue the preservation of indigenous culture and our sacred sites; engages proactively toward climate adaptation; cultivates sustainable development; and builds individual and community capacity.
  - vi. The **Institute for Local Self-Reliance:** is an organization that supports the creation of economic systems that embody democratic values. The organization's Energy Democracy program works to expand clean, dispersed energy generation and increase local ownership.
  - vii. **New Energy Economy:** was founded in 2004 to build a renewable energy future for the health, environment, and economy of New Mexico.
  - viii. **Rio Arriba Concerned Citizens (RACC):** is an entirely grassroots volunteer effort. The organization's mission is to protect the public health, land, air, and water of the Rio Chama Watershed, Rio Arriba County, and the State of New Mexico, and to promote sustainable development through education, collaborative planning, job creation, and community involvement. RACC joins this joint petition opposing JMEC's rate case on the basis that ratepayers will be put at risk for continued reliance on a fossil-fuel based contract with Tri-State Generation when other resource alternatives would be cheaper and far less harmful to the environment.
  - ix. **Tewa Women United:** is a collective of tribal women in the Tewa homelands of

Northern New Mexico dedicated to the promotion of educational, social and benevolent purposes, especially for ending violence against Native Women, Mother Earth, and to promote peace in New Mexico.

4. No other party in this proceeding can adequately represent the interests of New Energy Economy, the above specifically named persons and organizations, and other JMEC ratepayers.

5. This docket includes numerous issues that are of importance to NEE, JMEC ratepayers, and other organizational intervenors, including whether:

- i. the PRC should approve JMEC's request rate increase;
- ii. JMEC Board of Trustees' decision to place the majority of the increase in the Facility Charge<sup>12</sup> will result in just fair and reasonable rates;
- iii. JMEC Board of Trustees' investments have been prudent;
- iv. JMEC Board of Trustees' current policies and practices benefit the majority of ratepayers;
- v. JMEC Board of Trustees' have exercised their continuing obligation to monitor the validity of its decisions,<sup>13</sup> including whether to continue their long-term contract with Tri-State Generation in light of changing energy resource circumstances, including climate change and the dramatically declining costs of solar, wind and battery storage;
- vi. JMEC Board of Trustees' decision-making to apply to dramatically increase the facility charge as opposed to tying the increase to kWh usage (or the consideration of

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<sup>12</sup> NM PRC Case No. 21-00318-UT, *Protest to Proposed Rate Increase*, January 18, 2022, p. 29 of 118, JMEC's **92% increase** to the Residential Facility Charge is regressive and penalizes those customers who can least afford it OR are on fixed household income including senior citizens and the disabled. ... The proposed **\$27 Facility charge would place JMEC in line with the highest Facility charge in the State of New Mexico.**

<sup>13</sup> *Investigation into Vermont Elec. Utilities' Use of Smart Metering & Time-Based Rates*, 2009 WL 4024900, at \*1 (Vt. P.S.B. Nov. 16, 2009) (Our determination that a plan is acceptable will not shield a utility from a subsequent investigation and potential disallowance based upon the economic used-and-useful principle if events following approval should have led to an alteration of the [ ] deployment.).

any other alternatives) is consistent with law, specifically the Efficient Use of Energy Act, NMSA 1978, § 62-17-3, and the Renewable Energy Act, NMSA 1978, § 62-16-2, PRC precedent, and public policy: **“a substantial increase to the kWh rate will likely prompt members to curtail their overall energy use. Alternatively, such an increase may motivate other members to invest in and utilize renewable power equipment to supplement or entirely replace their dependence on JMEC as their sole source of electrical power.”**<sup>14</sup> (Emphasis supplied.)

- vii. JMEC Board of Trustees’ increases for ratepayers in this case violates anti-trust principles and antitrust laws because it proposes to charge customers who own rooftop solar panels higher electricity rates than other ratepayers proportionately;<sup>15</sup>
- viii. JMEC Board of Trustees’ increases for ratepayers in this case violates various New Mexico consumer protection, antitrust, and price discrimination laws; and the equal protection clauses of the United States and New Mexico constitutions;
- ix. JMEC Board of Trustees’ increases for ratepayers discriminates against customers that use solar energy systems and disincentivizes further purchases and use of solar energy systems by eliminating the economic value in investing in solar energy systems to self-generate electricity;
- x. JMEC Board of Trustees’ increases for ratepayers makes it economically unviable to invest in a solar energy system, thereby eliminating any competition from solar energy; and
- xi. JMEC Board of Trustees’ increases for ratepayers violates the Equal Protection Clause because it constitutes a continuing violation that unfairly, unreasonably, and unjustly distinguishes between solar customers and other customers; on that theory, it proposes *charging* rates—that constitutes the constitutional violation. Thus, there will be, if approved, a series of repeated violations each of which gives rise to a new cause of action and thereby begins a new statute of limitations period as to that particular event.<sup>16</sup> JMEC Board of Trustees’ increases for ratepayers are flawed because

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<sup>14</sup> Jemez Mountains Electric Cooperative, Inc.’s Objection to Members’ Protest, February 3, 2022, p. 10.

<sup>15</sup> *Ellis v. Salt River Project*, Nos. 20-15301, 20-15476., January 31, 2022.

<sup>16</sup> *Flynt v. Shimazu*, 940 F.3d 457, 462, n.3 (9th Cir. 2019) (quoting *Knight v. Columbus*, 19 F.3d 579, 582 (11th Cir. 1994)). (*Ellis v. Salt River Project*, *supra*: “SRP’s conduct constituted a ‘continuing violation.’ As we have explained in prior cases, however, that term can be somewhat misleading. What Ellis alleges is not ‘one on-going violation,’ but instead ‘a series of repeated violations,’ each of which ‘gives rise to a new cause of action’ and thereby ‘begins a new statute of limitations period as to that particular event.’ *Flynt*, 940 F.3d at 462 n.3 (quoting *Knight v. Columbus*, 19 F.3d 579, 582 (11th Cir. 1994)). In the past, we recognized a broader ‘continuing violations doctrine’ under which a plaintiff alleging a series of related acts[.]

“[c]oercive activity that prevents its victims from making free choices between market alternatives” gives rise to antitrust injury.<sup>17</sup>

6. New Energy Economy, on behalf of protestor ratepayer members and other organizations, joins and adopts the following PRC Staff’s conclusions:

- there were at least 114 valid, timely protests by customers; it can be determined, therefore, that the requirement set forth under NMSA 1978, Section 62-8-7(H) of the lesser of one percent or 25 members of a rate class has been met for the Residential class;
- arguments raised in the Protest and the arguments raised in JMEC’s Objection warrant further review and analyses in the context of a general rate case proceeding;
- JMEC’s notice appears to comply with Commission Rule 17.9.540.13(B) NMAC;
- JMEC’s filing includes a Cost of Service (“COS”) study that utilizes a 2019 base period is inadequate to analyze a rate inquiry; JMEC’s request for a variance from the definition of a base period defined in Section 17.1.3.7(B) NMAC should be denied. Consistent with Staff’s recommendations the Commission should require that JMEC file an updated COS study that complies with applicable Commission rules and require the most recent possible 12-month period as addressed in Staff’s response.<sup>18</sup>
- New Energy Economy also agrees that this case might benefit from assignment to a Hearing Examiner and discovery on the merits (for two-four months). Following this

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<sup>17</sup> *Glen Holly Entm't, Inc. v. Tektronix, Inc.*, 352 F.3d 367, 374 (9th Cir. 2003) (quoting *Amarel v. Connell*, 102 F.3d 1494, 1509 (9th Cir. 1996)). To adequately plead antitrust injury, a plaintiff need not allege that the exclusionary conduct has succeeded in displacing all competition. *See id.* at 376; *cf. Brunswick*, 429 U.S. at 489 n.14 (“[C]ompetitors may be able to prove antitrust injury before they actually are driven from the market and competition is thereby lessened.”). Rather, the plaintiff need only “show that diminished consumer choices and increased prices are the result of a less competitive market due to either artificial restraints or predatory and exclusionary conduct.” *FTC v. Qualcomm, Inc.*, 969 F.3d 974, 990 (9th Cir. 2020). That is precisely what Ellis alleges: He was “directly and economically hurt by” SRP’s exclusionary pricing scheme, which is aimed at suppressing competition by discouraging customers from installing solar-energy systems. *Glen Holly*, 352 F.3d at 376. Ellis’s injury was caused by a scheme “inten[ded] to harm competition by increasing prices,” and his injury “flows from that which makes [the conduct] unlawful.” *American Ad Mgmt.*, 190 F.3d at 1056.

<sup>18</sup> 20-00318-UT, *Staff’s Determination Pursuant to the Commission’s Order Suspending Proposed Rates and Requiring Responses*, February 10, 2022, pp. 4-7.

assignment, NEE believes that an alternative approach: settlement negotiations with a mediator might prove wise for all parties involved.<sup>19</sup>

7. The Commission has jurisdiction over the matters addressed herein and there is just cause for review by the Commission or presiding officer. If the Commission finds that just cause pursuant to Commission Rule 17.9.540.12 D NMAC exists NEE is requesting permission to intervene as counsel for individual JMEC protestor ratepayer members and the other individuals and organizations listed above.

8. NM PRC precedent and NM Supreme Court law<sup>20</sup> requires JMEC to consider all feasible alternatives *before* making additional rate base expenditures, including capital investments and extending the life of their current resources, including long-term contracts for power.

9. Pursuant to NM PRC rules New Energy Economy respectfully requests that we be served via U.S. mail with all testimony (including supplemental, rebuttal testimony, etc.) and by email with copies of all filings in this matter as well as all discovery requests, responses and objections made by any party in this proceeding. Service should be provided by email to:

Mariel Nanasi - [mariel@seedsbeneaththesnow.com](mailto:mariel@seedsbeneaththesnow.com)

All testimony should be served via hard copy to:

Mariel Nanasi, 300 East Marcy St., Santa Fe, New Mexico, 87501.

10. NEE circulated its motion to Joseph Yar, attorney for JMEC, and John Bogatko, attorney for PRC Staff, and requested parties' positions on NEE's intervention. The following

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<sup>19</sup> Id., pp. 7-8.

<sup>20</sup> *Pub. Serv. Co. of New Mexico v. New Mexico Pub. Regulation Comm'n*, 2019-NMSC-012, ¶¶29-33, ¶52, 444 P.3d 460.

parties responded as follows:

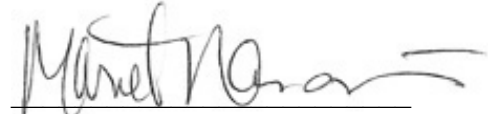
JMEC opposes.

Staff does not oppose, pending the Commission's determination regarding the procedural posture of this matter.

**Wherefore**, on behalf of the Joint Protestors, we humbly request that New Energy Economy on behalf of the JMEC ratepayer members and other organizations be granted leave to intervene in and become a party to this case, the service list be expanded as requested, and New Energy Economy be served with all discovery and communications in this case.

Respectfully submitted, February 21, 2022

**New Energy Economy, on behalf of protestor ratepayer members and other organizations,**

A handwritten signature in dark ink, appearing to read 'Mariel Nanasi', is written over a horizontal line.

Mariel Nanasi, Esq.  
Executive Director, New Energy Economy  
300 East Marcy St.  
Santa Fe, NM 87501  
(505) 469-4060  
[mariel@seedsbeneaththesnow.com](mailto:mariel@seedsbeneaththesnow.com)



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PETITIONER. )

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of

**NEW ENERGY ECONOMY'S REQUEST FOR INTERVENTION  
ON BEHALF OF JEMEZ MOUNTAINS ELECTRIC COOPERATIVE  
RATEPAYERS & OTHER ORGANIZATIONS  
IN OPPOSITION TO THE RATE INCREASE REQUEST BY  
JEMEZ MOUNTAINS ELECTRIC COOPERATIVE, INC.**

was sent via email to the following parties on the date indicated below:

NM Attorney General	<a href="mailto:utilityfilings@nmag.gov">utilityfilings@nmag.gov</a>
John Bogatko	<a href="mailto:john.bogatko@state.nm.us">john.bogatko@state.nm.us</a>
Elisha C. Leyba-Tercero	<a href="mailto:Elisha.leyba-tercero@state.nm.us">Elisha.leyba-tercero@state.nm.us</a>
John Reynolds	<a href="mailto:john.reynolds@state.nm.us">john.reynolds@state.nm.us</a>
William Herrmann	<a href="mailto:William.Herrmann@state.nm.us">William.Herrmann@state.nm.us</a>
David Ault	<a href="mailto:David.ault@state.nm.us">David.ault@state.nm.us</a>
Bradford Borman	<a href="mailto:Bradford.borman@state.nm.us">Bradford.borman@state.nm.us</a>
Judith Amer	<a href="mailto:Judith.amer@state.nm.us">Judith.amer@state.nm.us</a>
Peggy Martinez-Rael	<a href="mailto:peggy.martinez-rael@state.nm.us">peggy.martinez-rael@state.nm.us</a>
Elizabeth Ramirez	<a href="mailto:Elizabeth.Ramirez@state.nm.us">Elizabeth.Ramirez@state.nm.us</a>
Gilbert Fuentes	<a href="mailto:Gilbert.fuentes@state.nm.us">Gilbert.fuentes@state.nm.us</a>
Jack Sidler	<a href="mailto:jack.sidler@state.nm.us">jack.sidler@state.nm.us</a>
Judith Amer	<a href="mailto:Judith.amer@state.nm.us">Judith.amer@state.nm.us</a>
Kelly Richerson	<a href="mailto:Kelly.Richerson@state.nm.us">Kelly.Richerson@state.nm.us</a>
Joseph Yar	<a href="mailto:joseph@yarlawoffice.com">joseph@yarlawoffice.com</a>
Shawna Tillberg	<a href="mailto:shawna@yarlawoffice.com">shawna@yarlawoffice.com</a>
Frank Coopler	<a href="mailto:sfcoppler@coppler.com">sfcoppler@coppler.com</a>
Michael Hastings	<a href="mailto:mhastings@jemezcoop.org">mhastings@jemezcoop.org</a>
Carmen Campbell	<a href="mailto:ccampbell@jemezcoop.org">ccampbell@jemezcoop.org</a>
Tina Trujillo-Archuleta	<a href="mailto:ttrujillo@jemezcoop.org">ttrujillo@jemezcoop.org</a>
Dennis Trujillo	<a href="mailto:drtrujillo@windstream.net">drtrujillo@windstream.net</a>
Manny Bustos	<a href="mailto:mannybelectric9@gmail.com">mannybelectric9@gmail.com</a>
Dolores McCoy	<a href="mailto:gert_mccoy@live.com">gert_mccoy@live.com</a>
Marcie Martinez	<a href="mailto:MarcieJMEC6@protonmail.com">MarcieJMEC6@protonmail.com</a>
Marissa Maestas-Mueller	<a href="mailto:marissaem4@gmail.com">marissaem4@gmail.com</a>

Stanley Crawford	<a href="mailto:crawfordstanley@gmail.com">crawfordstanley@gmail.com</a>
Lucas Cordova	<a href="mailto:ljcjemez@gmail.com">ljcjemez@gmail.com</a>
Bruce Duran	<a href="mailto:bruce_duran@yahoo.com">bruce_duran@yahoo.com</a>
Elias Coriz	<a href="mailto:ecoriz.ec@gmail.com">ecoriz.ec@gmail.com</a>
Saraswati Khalsa	<a href="mailto:saraswati.kaur.khalsa@gmail.com">saraswati.kaur.khalsa@gmail.com</a>
John Gutting	<a href="mailto:gutting1944@gmail.com">gutting1944@gmail.com</a>
Annette Vigil	<a href="mailto:vigilannette@yahoo.com">vigilannette@yahoo.com</a>
Jim Klukkert	<a href="mailto:jimklukkert@yahoo.com">jimklukkert@yahoo.com</a>
Dan Najjar	<a href="mailto:dnajjar@virtuelaw.com">dnajjar@virtuelaw.com</a>
Antonio R. and Deborah Pefia	<a href="mailto:Tonypena48@gmail.com">Tonypena48@gmail.com</a>
Steve J. Duran	<a href="mailto:Six2five4steve@aol.com">Six2five4steve@aol.com</a>
Cristina Salazar-Langley	<a href="mailto:tin.sal.lang@gmail.com">tin.sal.lang@gmail.com</a>
Lionel and Monica Roybal	<a href="mailto:mfroybal@gmail.com">mfroybal@gmail.com</a>
Joe Archuleta	<a href="mailto:archuleta@lanl.gov">archuleta@lanl.gov</a>
Gideon Elliot	<a href="mailto:gelliot@nmag.gov">gelliot@nmag.gov</a>
Steve and Nancy Carson	<a href="mailto:rangehands@gmail.com">rangehands@gmail.com</a>
Cristella Trujillo-Neal	<a href="mailto:losneals@gmail.com">losneals@gmail.com</a>
Danny Ray Campo	<a href="mailto:sgtdanny@aol.com">sgtdanny@aol.com</a>
Keven Gedko	<a href="mailto:kgedko@nmag.gov">kgedko@nmag.gov</a>
Sharon Dogruel	<a href="mailto:dogruel@earthlink.net">dogruel@earthlink.net</a>
David Dogruel	<a href="mailto:ddogruel@earthlink.net">ddogruel@earthlink.net</a>
Richard Hughes	<a href="mailto:rwhughes@rothsteinlaw.com">rwhughes@rothsteinlaw.com</a>
Jude Pardee	<a href="mailto:Jude.pardee@gmail.com">Jude.pardee@gmail.com</a>
Joe M. Tenorio-Atty, Pueblo of Nambe	<a href="mailto:jmt@chestnutlaw.com">jmt@chestnutlaw.com</a>
Peter C. Chestnut-Atty, Pueblo of Nambe	<a href="mailto:pc@chestnutlaw.com">pc@chestnutlaw.com</a>
Carolyn J. Abeita-Atty, Pueblo de San Ildefonso	<a href="mailto:cabeita@nmlawgroup.com">cabeita@nmlawgroup.com</a>
Rachel Brown-Deputy Atty, Santa Fe County	<a href="mailto:rabrown@co.santa-fe.nm.us">rabrown@co.santa-fe.nm.us</a>
Ann L. Mauzy	<a href="mailto:amauzy@netzero.net">amauzy@netzero.net</a>
Suzanne A. Shaw	<a href="mailto:SShaw@puebloofpojoaque.org">SShaw@puebloofpojoaque.org</a>
Richard Rochester	<a href="mailto:RanchoNambe@gmail.com">RanchoNambe@gmail.com</a>
Loyda Martinez	<a href="mailto:ChimayoChile76@gmail.com">ChimayoChile76@gmail.com</a>
Phillip/Gail Roybal	<a href="mailto:pdroybal@gmail.com">pdroybal@gmail.com</a>
Patrick Herrera	<a href="mailto:patrickherrera@ymail.com">patrickherrera@ymail.com</a>
Joseph Fresquez	<a href="mailto:jfresquez@hotmail.com">jfresquez@hotmail.com</a>
David Quinton	<a href="mailto:dqretired@yahoo.com">dqretired@yahoo.com</a>
Ernest Garcia	<a href="mailto:tracey.garcia1976@gmail.com">tracey.garcia1976@gmail.com</a>
Louise Lourdes Cordova	<a href="mailto:lourdescordova97@yahoo.com">lourdescordova97@yahoo.com</a>
Tom Engel	<a href="mailto:tom@tomengel.net">tom@tomengel.net</a>
Chris Trujillo	<a href="mailto:cmtrujillo@lanl.gov">cmtrujillo@lanl.gov</a>
Bobby Montoya/Linda	<a href="mailto:blmontoya@valrnet.com">blmontoya@valrnet.com</a>
Fred Roybal/Teresita	<a href="mailto:terresita58roybal@yahoo.com">terresita58roybal@yahoo.com</a>
Robert Cordova	<a href="mailto:catchile@gmail.com">catchile@gmail.com</a>
James Malcom	<a href="mailto:isaiah01@windstream.net">isaiah01@windstream.net</a>
Suellen Strale	<a href="mailto:csuzy@newmexico.com">csuzy@newmexico.com</a>
Thomas Rodella Jr/Jose	<a href="mailto:thomasrodella@yahoo.com">thomasrodella@yahoo.com</a>
Angelino Pacheco/Roberta	<a href="mailto:gino_srt4@yahoo.com">gino_srt4@yahoo.com</a>

Justin Trujillo  
Waldo Montoya  
Anastacio Lujan/Elmer Lujan  
Bobby Chacon/Pamela  
Marissa Stone/Bardino  
Jolynn Plata  
Brian Patterson/Denise Wilder  
Alexandra Stone/DBA Blackstone  
Charles Apel/Mary  
Sandra Padilla Jacquez  
David Salazar Jr/Gina (Samantha Valdez)  
John Gutting  
Beatrice Romero  
Isabel/John Yates  
Raymond Lopez  
Thomas/Veronica Lopez  
Mary R. Woodson  
Javin Coriz  
Danny Martinez  
Robert A. Armijo  
Robert Salazar  
Tim Merrigan  
Annette Duran-Gonzales  
Melissa M. Rivera  
Renea Rodriguez  
Paul/Susan Johnson  
Leandro Rivera  
Nina Yozell Epstein  
Gary Davis  
Denise P Hearst  
Luana Berger  
Jeff L. Montoya  
Franois Miglio  
Robert Ortega  
Ray/Christella Baca  
Mary C. Trujillo  
Moon Rise Over Truchas  
Ashley Gasca  
Marilyn Smithers

[jutrujil@gmail.com](mailto:jutrujil@gmail.com)  
[waldom@windstream.net](mailto:waldom@windstream.net)  
[lisamac44@hotmail.com](mailto:lisamac44@hotmail.com)  
[angel87567@icloud.com](mailto:angel87567@icloud.com)  
[marissabardino@gmail.com](mailto:marissabardino@gmail.com)  
[splatapersonal@msn.com](mailto:splatapersonal@msn.com)  
[dwilder1@gmail.com](mailto:dwilder1@gmail.com)  
[Alexandra.stone@yahoo.com](mailto:Alexandra.stone@yahoo.com)  
[jemec@gmail.com](mailto:jemec@gmail.com)  
[dalila0813@gmail.com](mailto:dalila0813@gmail.com)  
[Theresa.l.salazar3@gmail.com](mailto:Theresa.l.salazar3@gmail.com)  
[jgutting@q.com](mailto:jgutting@q.com)  
[beat.rice@gmail.com](mailto:beat.rice@gmail.com)  
[misskim1026@aol.com](mailto:misskim1026@aol.com)  
[rayjenlopez@q.com](mailto:rayjenlopez@q.com)  
[werlopez@aol.com](mailto:werlopez@aol.com)  
[gailmtz@hotmail.com](mailto:gailmtz@hotmail.com)  
[javinvictoria@yahoo.com](mailto:javinvictoria@yahoo.com)  
[danny\\_8162@msn.com](mailto:danny_8162@msn.com)  
[anitamarmijo@gmail.com](mailto:anitamarmijo@gmail.com)  
[rob@perfectionconstruction.com](mailto:rob@perfectionconstruction.com)  
[tcmerriegan@gmail.com](mailto:tcmerriegan@gmail.com)  
[auduran271965@yahoo.com](mailto:auduran271965@yahoo.com)  
[rivera.acura@hotmail.com](mailto:rivera.acura@hotmail.com)  
[legalgirl722000@yahoo.com](mailto:legalgirl722000@yahoo.com)  
[paulj@cybermesa.com](mailto:paulj@cybermesa.com)  
[Leondro\\_rivera@hotmail.com](mailto:Leondro_rivera@hotmail.com)  
[nina.nistula@gmail.com](mailto:nina.nistula@gmail.com)  
[gary@plantafe.com](mailto:gary@plantafe.com)  
[denise.hearst@gmail.com](mailto:denise.hearst@gmail.com)  
[lanyhb@yahoo.com](mailto:lanyhb@yahoo.com)  
[tew\\_dragons@yahoo.com](mailto:tew_dragons@yahoo.com)  
[migliofrancois@gmail.com](mailto:migliofrancois@gmail.com)  
[ortegashop@newmexico.com](mailto:ortegashop@newmexico.com)  
[raybaca@windstream.net](mailto:raybaca@windstream.net)  
[mtrujillo4@yahoo.com](mailto:mtrujillo4@yahoo.com)  
[moonriseovertruchas@gmail.com](mailto:moonriseovertruchas@gmail.com)  
[ash.elijah2016@gmail.com](mailto:ash.elijah2016@gmail.com)  
[marilynsmithers@rocketmail.com](mailto:marilynsmithers@rocketmail.com)

#### NMPRC Commissioners

PRC Commissioner Cynthia Hall  
Executive Assistant Colin Gillespie  
PRC Commissioner Jefferson Byrd

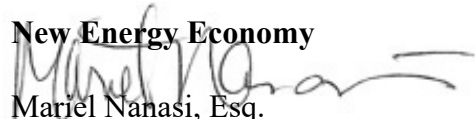
[Cynthia.Hall@state.nm.us](mailto:Cynthia.Hall@state.nm.us)  
[Collin.Gillespie@state.nm.us](mailto:Collin.Gillespie@state.nm.us)  
[Jeff.Byrd@state.nm.us](mailto:Jeff.Byrd@state.nm.us)

Executive Assistant Deborah Bransford  
PRC Commissioner Joseph Maestas  
Executive Assistant Christopher Hall  
PRC Commissioner Theresa Becenti-Aguilar  
Executive Assistant Jennifer Baca  
PRC Commissioner Stephen Fischmann  
Executive Assistant Robert Lundin

[Deborah.Bransford@state.nm.us](mailto:Deborah.Bransford@state.nm.us)  
[Joseph.Maestas@state.nm.us](mailto:Joseph.Maestas@state.nm.us)  
[Christopher.Hall@state.nm.us](mailto:Christopher.Hall@state.nm.us)  
[T.Becenti@state.nm.us](mailto:T.Becenti@state.nm.us)  
[JenniferA.Baca@state.nm.us](mailto:JenniferA.Baca@state.nm.us)  
[Stephen.Fischmann@state.nm.us](mailto:Stephen.Fischmann@state.nm.us)  
[Robert.Lundin@state.nm.us](mailto:Robert.Lundin@state.nm.us)

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**New Energy Economy**



Mariel Nanasi, Esq.

300 East Marcy St.

Santa Fe, NM 87501

(505) 469-4060

[mariel@seedsbeneaththesnow.com](mailto:mariel@seedsbeneaththesnow.com)