

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF A PROTEST TO THE )**  
**2012 NEW MEXICO GAS COMPANY )** Case No. 12-00145-UT  
**INTEGRATED RESOURCE PLAN. )**  
\_\_\_\_\_ )

**UNOPPOSED MOTION FOR EXTENSION OF TIME**  
**TO FILE JOINT REPORT**

New Mexico Gas Company, Inc. ("NMGC") and the National Nuclear Security Administration of the United States Department of Energy ("NNSA"), respectfully request the New Mexico Public Regulation Commission (the "Commission") issue an Order extending the time within which NMGC and NNSA must file a joint report detailing the discussions between NMGC, NNSA and interested parties as required by the Commission's May 15, 2012 Initial Order (the "Initial Order") and in support thereof states as follows:

1. On April 2, 2012, pursuant to 17.7.4 NMAC, NMGC filed its Natural Gas Resource Plan ("IRP").
2. On May 2, 2012, NNSA filed its Protest (the "Protest") objecting to NMGC's IRP, and asserting various grounds for the Protest.
3. Pursuant to the Initial Order, NMGC and NNSA are to file by June 14, 2012, a joint report detailing the results of the discussions between all interested parties relating to resolving objections to NMGC's IRP.
2. NMGC and NNSA scheduled meetings on May 24 and May 31, 2012 to discuss the disputed issues. The Commission's Utility Division Staff ("Staff") and the Attorney General (the "AG") were invited to participate in the discussions. No other party expressed interest in participating in the discussions.

3. NMGC and NNSA met on May 24 and May 31, 2012, and discussed the disputed issues and all related matters. Staff attended these meetings by phone.

4. NMGC and NNSA are close to an agreement that would resolve NNSA's Protest, but need more time to complete discussions.

5. NMGC and NNSA respectfully request an extension of time up to and including June 28, 2012 within which to submit the joint report required by the Initial Order.

6. Staff and the AG support this Unopposed Motion for Extension of Time.

WHEREFORE, NMGC and NNSA respectfully request an extension of time up to and including June 28, 2012 within which to submit the joint report required by the Initial Order.

Respectfully submitted,

NEW MEXICO GAS COMPANY, INC.

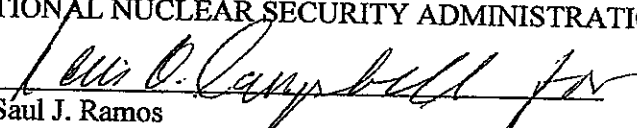
By: 

Thomas M. Domme, Vice President  
and General Counsel  
P.O. Box 97500  
Albuquerque, New Mexico 87199-7500  
Phone: (505) 697-3300  
Fax: (505) 797-4752

Keleher & McLeod, P.A.  
Clyde F. Worthen, Esq.  
Brian J. Haverly, Esq.  
P.O. Box AA  
Albuquerque, New Mexico 87103  
(505) 346-4646  
cfw@keleher-law.com  
bjh@keleher-law.com

NATIONAL NUCLEAR SECURITY ADMINISTRATION

By:

  
Saul J. Ramos

National Nuclear Security Administration

U.S. Department of Energy

P.O. Box 5400

Albuquerque, New Mexico 87185

(505) 845-6166

Sramos@doeal.gov

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF A PROTEST TO THE 2012 )  
NEW 2012 NEW MEXICO GAS COMPANY ) Case No. 12-00145-UT  
INTEGRATED RESOURCE PLAN. )  
\_\_\_\_\_ )**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of **Unopposed Motion for Extension of Time to File Joint Report**, issued June 13, 2012, was sent either by electronic mail, hand-delivered or by first class postage prepaid U.S. Mail to the parties below:

Thomas Domme, Esq.  
New Mexico Gas Company  
P.O. Box 97500/MS/AC02  
Albuquerque, NM 87199-7500  
[tom.domme@nmgco.com](mailto:tom.domme@nmgco.com)

Mary E. Homan  
New Mexico Gas Company/Regulatory Policy  
P.O. Box 97500/MS/AC04  
Albuquerque, NM 87199-7500  
[mary.homan@nmgco.com](mailto:mary.homan@nmgco.com)

Bruce Throne, Esq.  
1440 B. South St. Francis Dr.  
Santa Fe, NM 87505

Roger Colton  
Fisher, Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478

John Arrowsmith  
Utilities Manager  
Department. of Public Utilities  
P.O. Box 1030  
Los Alamos, NM 87544

Evan D. Evans  
El Paso Electric Company  
100 N. Stanton  
El Paso, TX 79901

Sheryl Carter  
NRDC  
111 Sutter Street – 20<sup>th</sup> Floor  
San Francisco, CA 94104

Elida Saucedo  
1507 Katie St NE  
Albuquerque, NM 87110

Lewis O. Campbell  
Keres Consulting, Inc.  
Utility Support Contractor  
P.O. Box 51508  
Albuquerque, NM 87181-1508

Saul J. Ramos  
National Nuclear Security Admin.  
U.S. Department of Energy  
Post Office Box 5400  
Albuquerque, NM 87185-5400

**Hand-delivered to:**

Rick Blumenfeld  
NMPRC-OGC  
1120 Paseo de Peralta  
Santa Fe, NM 87501

Nancy Burns  
NMPRC-Legal Division  
1120 Paseo de Peralta  
Santa Fe, NM 87501

Tim Martinez  
NMPRC-Utility Division  
1120 Paseo de Peralta  
Santa Fe, NM 87501

John Reynolds  
NMPRC-Utility Division  
1120 Paseo de Peralta  
Santa Fe, NM 87501

Jim Brack  
NMPRC-Utility Division  
1120 Paseo de Peralta  
Santa Fe, NM 87501

Bruno Carrara  
NMPRC-Utility Division  
1120 Paseo de Peralta  
Santa Fe, NM 87501

**Sent electronically only to:**


Jeff Taylor, Esq.  
Loretta Martinez  
Clyde F. Worthen, Esq.  
Andrea Crane  
Theresa Leger, Esq.  
Noelle Graney, Esq.  
Sunny Nixon, Esq.  
Charles Garcia, Esq.  
Daniel A. Najjar, Esq.  
Maude Grantham-Richards  
Lewis O. Campbell, Esq.  
Richard L. Alvidrez, Esq.  
David B. Nava, Esq.  
Justin Lesky, Esq.  
Nann Winter, Esq.  
Peter Gould, Esq.  
Jeff D. Reynolds, Esq.  
Robert Kidd, Esq.  
Jenica Jacobi  
Jami Porter Lara  
Tom Singer  
Helga Schmikat  
Patricia Cardona  
Thomas Wander  
Sanders Moore  
David Van Winkle  
Stephen Fischmann  
Margret Carde  
Steven S. Michel, Esq.  
Tammy Fiebelkorn  
Benjamin Phillips, Esq.  
Jim Brack  
Nancy Burns, Esq.  
Timothy Martinez  
Richard. D. Vergas, Esq.

[JTaylor@nmag.gov](mailto:JTaylor@nmag.gov)  
[Lmartinez@nmag.gov](mailto:Lmartinez@nmag.gov)  
[cfw@keleher-law.com](mailto:cfw@keleher-law.com)  
[ctcolumbia@aol.com](mailto:ctcolumbia@aol.com)  
[tleger@nordhauslaw.com](mailto:tleger@nordhauslaw.com)  
[ngraney@nordhauslaw.com](mailto:ngraney@nordhauslaw.com)  
[snixon@rodey.com](mailto:snixon@rodey.com)  
[cgarcia@mstlaw.com](mailto:cgarcia@mstlaw.com)  
[vnajjar@aol.com](mailto:vnajjar@aol.com)  
[MaudeGR@fmtn.org](mailto:MaudeGR@fmtn.org)  
[Lcampbell@abqenergy.net](mailto:Lcampbell@abqenergy.net)  
[ralvidrez@mstlaw.com](mailto:ralvidrez@mstlaw.com)  
[dnavas@cabq.gov](mailto:dnavas@cabq.gov)  
[jlesky@leskylawoffice.com](mailto:jlesky@leskylawoffice.com)  
[nmw@sssllawfirm.com](mailto:nmw@sssllawfirm.com)  
[pgouldlaw@aol.com](mailto:pgouldlaw@aol.com)  
[JER@gknet.com](mailto:JER@gknet.com)  
[rkidd@cabq.gov](mailto:rkidd@cabq.gov)  
[jjacobi@cabq.gov](mailto:jjacobi@cabq.gov)  
[jlaraporter@gmail.com](mailto:jlaraporter@gmail.com)  
[tsinger@nrdc.org](mailto:tsinger@nrdc.org)  
[Schimkat\\_Law@comcast.net](mailto:Schimkat_Law@comcast.net)  
[trishcard@hotmail.com](mailto:trishcard@hotmail.com)  
[Thomas.Wander@pnmresources.com](mailto:Thomas.Wander@pnmresources.com)  
[sanders@environmentnewmexico.org](mailto:sanders@environmentnewmexico.org)  
[david@vw77.com](mailto:david@vw77.com)  
[Stephen.fischmann@gmail.com](mailto:Stephen.fischmann@gmail.com)  
[mcarde@live.com](mailto:mcarde@live.com)  
[smichel@westernresources.org](mailto:smichel@westernresources.org)  
[tfeibelkorn@swenergy.org](mailto:tfeibelkorn@swenergy.org)  
[Ben.phillips@pnmresources.com](mailto:Ben.phillips@pnmresources.com)  
[Jim.brack@state.nm.us](mailto:Jim.brack@state.nm.us)  
[Nancy.burns@state.nm.us](mailto:Nancy.burns@state.nm.us)  
[Timothy.martinez@state.nm.us](mailto:Timothy.martinez@state.nm.us)  
[rvergas@doeal.gov](mailto:rvergas@doeal.gov)

Laura E. Sanchez, Esq.  
Jay Kumar  
Howard Geller  
Michael Dirmeier  
Richard Mertz, Esq.  
Kimberly N. Bell, Esq.  
Randall W. Childress, Esq.  
Stacey J. Goodwin, Esq.  
John Reynolds  
Craig O'Hare  
Jack Purson  
Ken Hughes  
Tom Dobson  
Steve Henderson  
Judy Stubbs  
Bill Monlux  
Dave Gilmer  
Cliff Richardson  
Jerry Pekarek  
Jeff Zumwalt  
Bill Payne  
Larry Mapes  
Cora Bermal  
Eva Bermal  
Michael Furze  
Dean Brunton  
Cindy Bothwell  
David Romero  
Bill Foster  
Andy Robertson  
Thomas Domme  
Mary Homan  
Saul J. Ramos  
Steven Porter

[lsanchez@nrdc.org](mailto:lsanchez@nrdc.org)  
[jkumar@etcinc.biz](mailto:jkumar@etcinc.biz)  
[hgeller@swenergy.org](mailto:hgeller@swenergy.org)  
[mdirmeie@gsb.uchicago.edu](mailto:mdirmeie@gsb.uchicago.edu)  
[RMertz@salud.unm.edu](mailto:RMertz@salud.unm.edu)  
[KiBell@salud.unm.edu](mailto:KiBell@salud.unm.edu)  
[randy@childresslaw.com](mailto:randy@childresslaw.com)  
[stacey@childresslaw.com](mailto:stacey@childresslaw.com)  
[john.reynolds@state.nm.us](mailto:john.reynolds@state.nm.us)  
[cohare@state.nm.us](mailto:cohare@state.nm.us)  
[purson@earthlink.net](mailto:purson@earthlink.net)  
[khughes@state.nm.us](mailto:khughes@state.nm.us)  
[Tom.dobson@el Paso.com](mailto:Tom.dobson@el Paso.com)  
[stevelhenderson@hotmail.com](mailto:stevelhenderson@hotmail.com)  
[Judystubbs@cableone.net](mailto:Judystubbs@cableone.net)  
[billmonlux@gmail.com](mailto:billmonlux@gmail.com)  
[dgilmer@iecc.org](mailto:dgilmer@iecc.org)  
[Clifford.richardson.ctr@kirtland.af.mil](mailto:Clifford.richardson.ctr@kirtland.af.mil)  
[pekjj@msn.com](mailto:pekjj@msn.com)  
[jzumwalt@unm.edu](mailto:jzumwalt@unm.edu)  
[bpayne37@comcast.net](mailto:bpayne37@comcast.net)  
[lmapes@valverdeenergy.com](mailto:lmapes@valverdeenergy.com)  
[Ubermom87@yahoo.com](mailto:Ubermom87@yahoo.com)  
[evavmae@yahoo.com](mailto:evavmae@yahoo.com)  
[mfurze@housingnm.org](mailto:mfurze@housingnm.org)  
[Dean.brunton@pnmresources.com](mailto:Dean.brunton@pnmresources.com)  
[cbothwe@pnm.com](mailto:cbothwe@pnm.com)  
[David.romero@krqe.com](mailto:David.romero@krqe.com)  
[b.foster@regensp.com](mailto:b.foster@regensp.com)  
[andyrobertson@comcast.net](mailto:andyrobertson@comcast.net)  
[tom.domme@nmgco.com](mailto:tom.domme@nmgco.com)  
[mary.homan@nmgco.com](mailto:mary.homan@nmgco.com)  
[Saul.Ramos@nnsa.doe.gov](mailto:Saul.Ramos@nnsa.doe.gov)  
[Steven.Porter@hq.doe.gov](mailto:Steven.Porter@hq.doe.gov)

Dated this 13th day of June, 2012.

By:   
for Mary E. Homan  
Project Manager, Regulatory Affairs  
New Mexico Gas Company  
P.O. Box 97500  
Albuquerque, NM 87199-7500  
Telephone: (505) 697-3833