

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF THE APPLICATION )  
OF NEW MEXICO GAS COMPANY FOR )  
APPROVAL OF 2015 AND 2016 ENERGY )  
EFFICIENCY PROGRAMS AND PROGRAM )  
COST TARIFF RIDER PURSUANT TO THE )  
NEW MEXICO PUBLIC UTILITY AND )  
EFFICIENT USE OF ENERGY ACTS, )  
 )  
NEW MEXICO GAS COMPANY, )  
Applicant. )  
\_\_\_\_\_ )**

**Case No. 14-00273-UT**

**MOTION FOR LEAVE TO INTERVENE  
AND REQUEST FOR DISCOVERY**

The Attorney General of the State of New Mexico, Gary K. King (“Attorney General”), pursuant to NMSA 1978, Sections 8-5-2 and 8-5-17, and NMPRC Rules 17 NMAC 1.2.26.1 to 17 NMAC 1.1.26.2, respectfully moves for leave to intervene and be treated as a party to this proceeding. In support of this motion, the Attorney General states:

1. The Attorney General is required to appear before regulatory agencies, when, in his judgment, the public interest of the state requires such action and to represent consumers before the Public Regulation Commission (“Commission”) as he deems appropriate. NMSA 1978, Sections 8-5-2(J) and 8-5-17.

2. The Attorney General seeks to intervene in this proceeding to represent the interests of residential and small business ratepayers otherwise unrepresented because, in his judgment, it is appropriate and the public interest so requires.

3. The nature of the movant's interest and the facts relied upon as grounds for intervention are that the public interest of the State of New Mexico and the interests of residential

and small business consumers will be directly affected by the Commission's disposition in this case.

4. The Attorney General seeks by this intervention to examine all utility filings, to conduct discovery, and to present evidence and argument concerning the issues raised by this filing.

5. Service should be provided to:

P. Cholla Khoury  
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6. Pursuant to NMPRC Rule 17 NMAC 1.2.28.8, the Attorney General hereby requests that copies of any and all interrogatories, requests for production or inspection of documents, requests for admissions and other written discovery requests or notices, as well as any and all written responses or objections thereto, made by other parties in this proceeding be served on the Assistant Attorneys General named above.

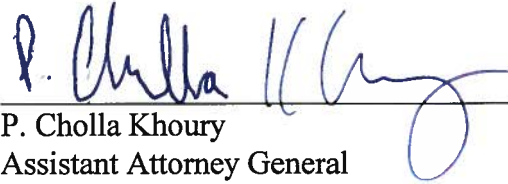
WHEREFORE, the Attorney General respectfully requests:

- 1) leave to intervene in and become a party to this proceeding;
- 2) for expansion of service list;
- 3) to receive discovery filings, as specified in paragraph 6, above; and
- 4) for such other and further relief as this Commission deems just and proper.

Respectfully submitted,

OFFICE OF THE NEW MEXICO ATTORNEY GENERAL

GARY K. KING  
Attorney General

A handwritten signature in blue ink, appearing to read "P. Cholla Khoury", is written over a horizontal line.

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DATED this 25<sup>th</sup> day of September, 2014.

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Applicant. )  
)  
\_\_\_\_\_ )**

**Case No. 14-00273-UT**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the **MOTION FOR LEAVE TO INTERVENE AND REQUEST FOR DISCOVERY**, filed on the 25<sup>th</sup> day of September, 2014, was mailed, first-class, postage pre-paid or via electronic transmission, to the following parties of record:

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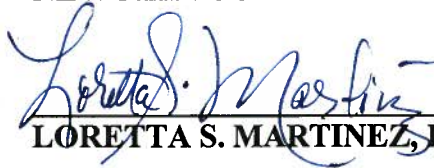
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**DATED** this 25<sup>th</sup> day of September, 2014.

**NEW MEXICO ATTORNEY GENERAL'S OFFICE**



**LORETTA S. MARTINEZ, Paralegal**