

NEW MEXICO
PUBLIC REGULATION
BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION
FILED

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.)

2014 NOV 25 PM 3 07

Case No. 14-00273-UT

Direct Testimony

Of

Heidi M. Pitts

On Behalf of

New Mexico Public Regulation Commission

Utility Division Staff

November 25, 2014

**DIRECT TESTIMONY OF
HEIDI M. PITTS
NMPRC CASE NO. 14-00273-UT**

1 **Q. Please state your name and business address.**

2 A. My name is Heidi M. Pitts. My business address is the New Mexico Public
3 Regulation Commission (“NMPRC” or “Commission”) Utility Division, 1120
4 Paseo de Peralta, Santa Fe, New Mexico 87501.

5

6 **Q. What is your position with the NMPRC?**

7 A. I am an Economist with the Staff of the Utility Division (“Staff”) Economics
8 Bureau of the NMPRC.

9

10 **Q. Please describe your educational background and professional
11 experience.**

12 A. I received a Bachelor of Arts degree in Spanish from the University of
13 Kansas in Lawrence, Kansas. From 2001-2003, I was an Economic
14 Development Volunteer with the United States Peace Corps in Honduras.
15 From 2003-2006, I worked for a non-profit that focused on
16 entrepreneurship and economic development. Subsequently, I received a
17 Master of Arts degree in Economics from the University of New Mexico in
18 Albuquerque, New Mexico and am currently finishing the doctoral degree
19 requirements. During graduate school, I worked on various applied
20 economics research projects. I joined the Utility Division of the PRC as an
21 Economist in April 2014. In May 2014, I attended New Mexico State
22 University’s Center for Public Utilities “Practical Regulatory Training for the
23 Electric Industry.”

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1

2 **Q. Have you previously testified before this Commission?**

3 A. Yes. I have testified in 14-00158-UT (PNM Renewable Portfolio Standard
4 2015-16 Procurement Plan) and 14-00150-UT (PNM Rio Rancho
5 underground rider).

6

7 **Q. What is the purpose of your Direct Testimony in this case?**

8 A. I will provide Staff's review of New Mexico Gas Company's (NMGC)
9 proposed Energy Efficiency programs, recommending approval of
10 NMGC's application. My testimony will:

- 11 • Present an overview of the energy efficiency programs proposed by
- 12 NMGC
- 13 • Discuss the modifications from existing programs
- 14 • Look at the cost-effectiveness of the portfolio and the individual programs
- 15 • Discuss the program costs and the cost rider that will be used to recover
- 16 these costs

17

18 **Q. Are there any exhibits attached to your testimony?**

19 A. Yes, I will file three exhibits:

- 20 • Staff Exhibit HMP-1: Proposed energy efficiency programs with
- 21 modifications from existing programs.
- 22 • Staff Exhibit HMP-2: Comparison of projected and actual program costs
- 23 and participation rates from the approved 2013 energy efficiency program.

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- 1 • Staff Exhibit HMP-3: Comparison of 2013 and 2015 budgets by budget
2 category.

3

4 **Q. Please provide a brief description of New Mexico Gas Company's**
5 **2015 proposed energy efficiency programs.**

6 A. New Mexico Gas Company (NMGC) is proposing a portfolio of programs
7 that is composed of four residential programs and one commercial
8 program. Staff Exhibit HMP-1 presents the energy efficiency programs
9 proposed in this case, as well as a description of the proposed
10 modifications from the programs approved in Case No. 12-00339-UT,
11 which is the most recent energy efficiency case filed by NMGC. The
12 following is a brief description of NMGC's current proposal:

- 13 • Low-flow showerhead: Provides a free, low-flow showerhead package.
14 Ratepayer must request this on-line
15
- 16 • ENERGY STAR Space Heating program: Three measures comprise the
17 space heating program. First, there are three incentive levels (or tiers) for
18 installing high efficiency ENERGY STAR furnaces. The incentives
19 increase with the efficiency level of the furnace as measured by the
20 Annual
21 Fuel Utilization Efficiency ("AFUE") level. The efficiency levels are 92%,
22 95% and 97% AFUE. Homeowners receiving \$75 greater incentive at
23 each tier than home builders to reflect the higher cost of replacing
24 furnaces than installing in a new house. Second, NMGC proposes a new
25 two-tier incentive measure for installing high efficiency residential boilers,
26 also measured by AFUE. The two incentive tiers involve installing 92%
27 and 95% AFUE boilers. Third, the previously stand-alone insulation
28 program will now be a measure within the Space Heating program. It
29 retails its two-tier incentive level (a 25% rebate up to a certain maximum)
30 for installing insulation at the R-19 or R-38 levels.
31
- 32 • ENERGY STAR Water Heating: Two measures comprise the water
33 heating program. The first measure provides incentives for homeowners

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1 and builders to install a high efficiency tankless water heater, while the
2 second measure provides the same incentive levels for installing a high
3 efficiency condensing storage tank unit. Similar to the space heating
4 program, homeowners get an incentive that is \$75 greater than for
5 homebuilders because their costs are greater.
6

- 7 • Income Qualified program: This program's name is changing from the
8 previous "Low Income Weatherization" to "Income Qualified" program.
9 Four measures comprise this program. First, the Energy\$mart
10 Weatherization program that weatherizes the whole house (the Leverage
11 measure). The second and third measures are called Baseload and
12 Baseload Plus. These are for income qualified customers on the waiting
13 list for the whole house Energy\$mart Weatherization Leverage measure.
14 The Baseload measure provides features such as pipe wrap, water tank
15 insulation, low flow showerheads, and faucet aerators. The Baseload Plus
16 measure includes an additional in-depth service (attic insulation, furnace,
17 water heater, or air sealing). The final measure is a multi-family housing
18 service that will offer energy efficiency upgrades for all gas end uses, as
19 well as other services.
20
- 21 • Efficient Buildings program: This program combines two previous stand-
22 alone programs called SCORE (Schools Conserving Resources) and
23 Commercial Solutions but does not change the scope of these programs.
24 These programs are directed towards educational facilities and
25 commercial customers, respectively.
26

27 **Q. Briefly discuss the modifications in these programs from the**
28 **previous application.**

29 A. NMGC's proposed energy efficiency portfolio for 2015-2016 is based in
30 large part on NMGC's prior Energy Efficiency programs, but includes
31 those modifications listed in Staff Exhibit HMP-1 as are further described
32 here:

- 33 1. The Insulation program has been moved to be one measure within the
34 ENERGY STAR Space Heating program

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- 1 2. The incentives under the ENERGY STAR Water Heating program for the
2 tankless water heating measure have been reduced by \$75 for both home
3 owners and home builders in acknowledgement of a higher level federal
4 minimum efficiency requirements that begins April 15, 2015. Thus, to still
5 offer this rebate program, the incentive is reduced so that the cost-
6 effectiveness threshold is achieved. Previously the incentives were \$300
7 for home builders and \$375 for current home owners; under the proposed
8 plan, homebuilders will receive a \$225 incentive and homeowners will
9 receive a \$300 incentive to install an EnergyStar 0.82 EF or above
10 tankless water heater.
- 11 3. There is a new measure under the ENERGY STAR Water Heating
12 program that offers the same, adjusted incentive amount for installing high
13 efficiency condensing storage tank units.
- 14 4. There has been a change to the tier levels for the existing ENERGY STAR
15 Space Heating furnace installation measure. Previously the three furnace
16 efficiency level tiers were 90% AFUE, 92% AFUE, and 95% AFUE. The
17 90% AFUE was removed and a higher furnace tier, 97% AFUE, added.
18 Thus the proposed program is for 92%, 95% and 97% AFUE furnace
19 installations.
- 20 5. A new measure was added under the ENERGY STAR Space Heating
21 program. This measure provides incentives for installing high efficiency
22 residential boilers. There are two tiers of boilers, 92% and 95% AFUE,
23 with higher incentives for the installation of the higher efficiency level.

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1 There was no incentive for boilers in the previously approved energy
2 efficiency program.

3 6. The "Low Income Weatherization" program will be called the "Income
4 Qualified" program.

5 7. Within the Income Qualified program, the Multi-family housing measure
6 has been proposed to provide energy efficiency measures to lower
7 income, multi-family residential units. Multi-family residential properties
8 did not qualify for energy efficiency incentives previously.

9 8. The two commercial programs, "Commercial Solutions" and "SCORE" are
10 being combined into one program called "Efficient Buildings" program. But
11 the scope of the two programs remains the same.

12

13 **Q. What is the motivation for these modifications?**

14 A. In NMGC's 2013 Annual Energy Efficiency and Measurement &
15 Verification Report ("2013 M&V Report") the evaluator, ADM, made
16 multiple program recommendations.¹ Several of the modifications that
17 appear in the 2015 energy efficiency proposed programs list were
18 recommended in the M&V report. It appears to indicate that NMGC tried
19 to follow the advice while considering the cost-effectiveness of the
20 modifications.

21 With the Space Heating program, ADM recommended that the 90%
22 and 92% AFUE tiers be discontinued for new construction. NMGC

¹ 2013 M&V Report, pages 8-10.

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1 removed the 90% tier for both home builders and home owners and added
2 a third, higher tier of 97% AFUE furnaces.

3 With the Water Heating program, ADM recommended adding
4 condensing storage water heaters for home builders. NMGC followed the
5 recommendation and also included homeowners, with the same incentive
6 structure as for installation of tankless water heaters.

7 Finally, for the Low Income Weatherization Program, ADM noted
8 that there was not enough opportunity to participate for multi-family
9 housing units. NMGC has proposed a program this year designed
10 specifically for those customers.

11
12 **Q. Is Staff in agreement with these modifications?**

13 A. Yes, Staff supports these modifications as reasonable efforts to extend the
14 opportunity to participate in energy efficiency programs to additional
15 customers. For example, the largest increase in the opportunity to
16 participate comes from the inclusion of multi-family housing within the
17 Income Qualified program. Projected participation in this measure is 400
18 customers.² These individuals likely did not participate in any of these
19 programs before because multi-family residences did not qualify for other
20 measures within the Income Qualified program.

21 Within the Water Heating program, offering incentives for installing
22 a condensing storage water heater encourages individuals who cannot

² Case No. 14-00273-UT, Direct Testimony of Steve L. Casey, page 23

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1 afford the more expensive retrofit of a tankless water heater, to now be
2 able to take advantage of an energy efficiency program. Projected
3 participation is 20 customers who would not have been able to participate
4 previously.³

5 For the change in the tier incentive levels within the Space Heating
6 program, by adding the higher tier of 97% AFUE efficiency, this may not
7 change the participation level tremendously but it does allow for greater
8 energy savings than the 90% AFUE incentive level of the current program.

9
10 **Q. Does the portfolio of programs meet the cost-effectiveness test?**

11 A. Yes, based on a review of NMGC calculations, it is reasonable to suspect
12 that the proposed program will be cost effective. Cost effectiveness for
13 energy efficiency programs is measured using the Utility Cost Test
14 ("UCT"). A program meets the UCT if the utility cost of providing the
15 energy efficiency programs is less than the utility costs that are saved by
16 not purchasing natural gas. The costs include such things as internal and
17 external administrative cost, the cost of incentives, promotional
18 advertising, program evaluation, and overall portfolio costs. The benefits
19 are calculated as the estimated avoided cost of natural gas. Since this is
20 a ratio of benefits to costs, as long as the ratio exceeds 1.00, then the

³ Id.

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1 benefits are greater than the costs and the energy efficiency program
2 meets the UCT cost-effectiveness test.⁴

3 As shown in the Direct Testimony of Steve L. Casey (page 18), the
4 overall UCT for each program is well above this ratio and so meets the
5 UCT standard. The residential portfolio has a UCT of 1.48 and the
6 commercial portfolio has a UCT of 1.98, for a combined UCT of 1.57 for
7 the entire portfolio of energy efficiency programs. The ENERGY STAR
8 Water Heating program has the lowest UCT of any individual program at
9 1.04, but that still meets the UCT threshold test. This low UCT is due to
10 increasing minimum federal standards for water heaters that will begin in
11 April 2015, which act to reduce the amount of energy savings that can be
12 realized from installing higher efficiency water heaters. The UCT for the
13 other residential programs are 1.65 (Low Flow Showerhead program),
14 1.61 (Space Heating program), and 1.43 (Income Qualified program).

15
16 **Q. Did NMGC provide evidence of the benefits relative to the costs of**
17 **each proposed energy efficiency program?**

18 A. Yes. In NMGC Exhibit SLC-2, page 15 there is a table that provides the
19 estimate of the net present value (NPV) of costs and benefits. The NPV of
20 the entire energy efficiency program is estimated at \$4,369,063 while the
21 NPV of the benefits is estimated at \$6,730,838.

⁴ There are other measures of cost-effectiveness. The Total Resource Cost (TRC) method was used by utilities to in their energy efficiency proposals until recently changed by House Bill 267 (Case No. 14-00273-UT, Direct Testimony of Steve Casey, pg 18).

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1

2 **Q. How does the cost of this proposed portfolio of energy efficiency**
3 **programs compare the programs approved in NMGC's last approved**
4 **energy efficiency case, Case No. 12-00339-UT?**

5 A. Program costs are estimated based on projected participation as well as
6 other projected administration, promotional and evaluation costs. For the
7 2015-2016 proposed program, the costs are estimated to be \$4,369,063.
8 According the 2013 M&V Report, the total program costs were
9 \$4,134,836, which is an increase of approximately 5.6 percent.⁵ As
10 shown in, Staff Exhibit HMP-2 this is very close to what was actually
11 projected in Case No. 12-00339-UT. The projected costs for the 2013
12 Program Year were \$3,953,461. Individual costs per program vary from
13 the forecasted costs, but it at least partially results from changes in
14 participation rates.

15 Therefore, it is reasonable to assume that while the projected costs in
16 this case may increase slightly over the time period of the application, they
17 will not increase such that it eliminates the cost-effectiveness of the
18 portfolio. Furthermore, Staff Exhibit HMP-3 shows that the budget
19 amounts by category are only increasing slightly.

20

⁵ The NPV of the Total Economic Benefits were estimated at \$6,289,849 (2013 M&V Report, page 14)

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1 **Q. Is there an opportunity for NMGC to reconcile any under- or over-**
2 **collection of costs in case the current energy efficiency rider tariff of**
3 **\$0.0099 does not fully cover costs?**

4 A. Yes. Chapter 62-17-6(C) NMSA 1978 "Efficient Use of Energy Act"
5 ("EUEA") requires utilities to file annual tariff rider reconciliations for
6 Commission approval. In June 2014, NMGC filed Advice No. 42 to
7 reconcile over-recovery of costs related to the 2013 Program Year and
8 under-recovery of costs due to extra program expenses. Through this
9 process any necessary adjustment to the tariff rider to cover variation in
10 program costs is completed.

11

12 **Q. Which Commission Rule applies to this case with regards to Case**
13 **No. 13-00310-UT to repeal and replace Rule 17.7.2 NMAC?**

14 A. The Final Order in Case No. 13-00310-UT adopting the new energy
15 efficiency rule, Rule 17.7.2 NMAC, was issued on October 8, 2014 and
16 goes into effect on January 1, 2015. In the Pre-Hearing Conference held
17 on October, 1, 2014 it was agreed that because this case was filed in
18 August 2014, that the 2007 Version of Rule 17.7.2 apply.

19

20 **Q. Has NMGC met the public input requirement given in NMSA 1978, 62-**
21 **17-5(E) and 17.7.2.8.A NMAC?**

22 A. Yes, they have. The public input requirement states that utilities must
23 provide a forum to allow public input from various interested parties during

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1 the planning and development process prior to an energy efficiency
2 program filing. Interested parties include the AG, PRC staff, and EMNRD
3 staff among others. In its application, NMGC details meetings held with its
4 Advisory Group in February, June and August 2014. In addition to the
5 three parties listed previously, eight additional organizations/utilities and
6 individuals attended.⁶ Specifically, I was able to attend the June 2014
7 meeting in Albuquerque.

8
9 **Q. Does every affected customer class have a reasonable opportunity**
10 **to take advantage of the energy efficiency programs in the portfolio?**

11 A. In my opinion, yes. For example, customers who live in multi-family
12 housing now have an option to benefit from energy efficiency programs.

13
14 **Q. Is the proposed program cost tariff rider factor just and reasonable**
15 **and should it be approved?**

16 A. Yes, in my opinion, the proposed program costs are fair, just, reasonable
17 and should be approved.

18
19 **Q. Please provide a summary of Staff's recommendation with regards to**
20 **NMGC's proposed portfolio of energy efficiency programs.**

21 A. In summary, Staff finds that NMGC's portfolio of energy efficiency
22 programs meets the cost-effectiveness standard. NMGC provided three

⁶ 14-00273-UT, page 9 of 2015 Energy Efficiency Program Plan

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1 meeting dates when members of its Advisory Group could meet to provide
2 input on its portfolio of programs. Each interested party has had an
3 opportunity to participate in the process and provide input to NMGC in
4 regards to the energy efficiency programs being proposed in this case.
5 Finally, every affected customer class has the opportunity to participate in
6 at least one proposed energy efficiency program. Thus, Staff
7 recommends approval of NMGC's 2015-2016 Energy Efficiency Program
8 application.

9

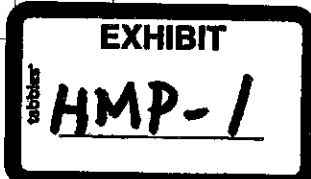
10 **Q. Does this conclude your testimony?**

11 A. Yes.

12

Exhibit HIMP-1: New Mexico Gas Company's Energy Efficiency Program Plan

Current Programs	Program changes		Proposed Programs	Description
	Program deletions	Program additions		
Residential				
Low Flow Showerhead			Free showerhead	Must request on-line to receive free package
Insulation	Will not be a stand alone program			
ENERGY STAR Water Heating	Reduce original incentive of \$300 for residential home builders and \$375 for existing home owners		Incentives for installation of high efficiency tankless water heaters	\$225 incentive for residential home builders and \$300 incentive for existing home owners
		Offer same incentives to install a high efficiency condensing storage tank unit	Incentives for installation of high efficiency condensing storage tank unit	\$225 incentive for residential home builders and \$300 incentive for existing home owners
ENERGY STAR Space Heating	Delete old tier levels: Tier I: 90% AFUE Tier II: 92% AFUE Tier III: 95% AFUE	New tier levels, same incentive amounts Tier I: 92% AFUE Tier II: 95% AFUE Tier III: 97% AFUE	Incentives for installation of ENERGY STAR furnaces. Incentives increase with efficiency level.	Tier I: 92% AFUE furnaces \$200 incentive for home builder, \$275 incentive for home owners
				Tier II: 95% AFUE furnaces \$250 incentive for home builder, \$325 incentive for home owners
				Tier III: 97% AFUE furnaces \$300 incentive for home builder, \$375 incentive for home owners
		Add a high efficiency residential boiler measure	High efficiency residential boiler measure	Tier I: 92% AFUE boiler \$200 incentive for home builder, \$275 incentive for home owners Tier II: 95% AFUE boiler \$250 incentive for home builder, \$325 incentive for home owners



		Was former stand-alone Insulation program, now a measure in Space Heating program	Insulation measure to increase efficiency of insulation rating. Amount of rebate depends on current level of insulation.	Tier I: 25% rebate (\$500 max) to install R-19 level or greater if home currently has level R-11 or less
				Tier II: 25% rebate (\$300 max) to install R-38 level or greater if home currently has level R-11 to R-19
Income Qualified program	Delete the former name of the program "Low Income Weatherization"	Change name to "Income Qualified Program"	New Mexico EnergySmart Weatherization program (administered by MIFA)	Baseload program: Provides pipe wrap, water tank insulation, low flow showerheads and faucet aerators. Energy auditor does walkthrough to advise eligibility and need for upgraded services
			Baseload and Baseload Plus program are for income qualified customers who are on the waiting list for the Whole-house program	Baseload Plus program: In addition to Baseload package, home is eligible for one of following measures – attic insulation, furnace, water heater, or air sealing while waiting for whole-house service
				Whole-house EnergySmart weatherization (Leverage)
		Multi-family housing program	Multi-family housing program	Offers energy efficiency upgrades for all gas end uses by providing the energy assessment, helping owner to access financing, evaluating rebates & incentives, and selects & monitors subcontractors who do installation
Commercial Efficient Buildings program	Delete Commercial Solutions and SCORE as separate programs	Combine them in a new program	On-site technical assistance and review plus education on financing energy efficiency projects for commercial customers and schools	Offers direct-install applications, rebates, and incentives of \$0.60 to \$0.90 per therm based on appliance life
				For schools it also offers a help

				<i>developing a master energy plan, benchmarking and identifying cost- effective projects/funding sources</i>

Exhibit HMP-2: 2013 program comparison, forecast and actual

Program	2013 Forecast				2013 Actual			% Change	
	TRC	Participation ¹	Total Program Budget ¹	Annual Therms Saved ^{1,2}	Participation ³	Budget ⁴	Participation	Budget	
Low Flow Showerhead	2.06	5,000	\$ 227,416	69,000	4,256	\$172,145	-15%	-24%	
Residential Insulation	1.31	750	\$ 372,587	57,938	373	\$278,533	-50%	-25%	
ENERGY STAR Water Heating	1.13	540	\$ 339,956	32,130	825	\$409,237	53%	20%	
ENERGY STAR Space Heating	1.10	600	\$ 346,025	43,608	1,250	\$538,567	108%	56%	
Low-Income Weatherization	1.10	882	\$1,383,334	133,150	596	\$1,416,782	-32%	2%	
Residential sub-total	1.22					\$2,815,264			
Commercial Solutions	1.49	157	\$627,013	141,528	31	\$689,289	-80%	10%	
SCORE	1.54	155	\$555,950	159,987	198	\$527,042	28%	-5%	
Commercial sub-total	1.52					\$1,216,331			
Portfolio Costs		n/a	\$101,180			\$103,241		2%	
Total	1.28		\$3,953,461	637,341	1,415	\$4,134,836			

¹ Case No. 12-00339-UT, Application for Approval of 2013 Energy Efficiency Programs and Program Cost Tariff Rider

² Annual therms saved (forecast) was adjusted for free-ridership

³ Actual program participation taken from 2013 Annual Energy Efficiency Report, page 14

⁴ Actual program costs (total) taken from 2013 Annual Energy Efficiency Report, page 12

⁵ Executive Summary from 2013 Annual Energy Efficiency Report, page 1-3. They also report a UCT ratio of 1.48



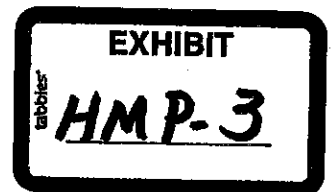
Exhibit HMP-3: Comparison of Budget category expenses, 2013 & 2015

Budget Category	2013 Projected Budget ¹	2013 Actual Budget ²	2015 Projected Budget ³
Internal Administration	\$322,302		\$330,806
External Administration	\$1,283,243		\$1,349,421
<i>Total Administration</i>	<i>\$1,605,545</i>	<i>\$1,441,080</i>	<i>\$1,680,227</i>
Incentives	\$2,038,736	\$2,377,982	\$2,304,163
Promotion	\$118,000	\$120,493	\$128,000
M&V	\$90,000	\$92,040	\$110,988
Portfolio Costs	\$101,180	\$103,241	\$145,685
Total	\$3,953,461	\$4,134,836	\$4,369,063

¹ Case No. 12-00339-UT, Application for Approval of 2013 Energy Efficiency Programs and Program Cost Tariff Rider

² 2013 Annual Energy Efficiency and M&V Report, pg. 5. Internal and external administration costs are grouped together. Incentives/rebates and Low Income Weatherization are broken out separately but are combined for this table as "Incentives."

³ Case No. 14-00273-UT, Application for Approval of 2015-2016 Energy Efficiency Programs, pg.24



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PUBLIC UTILITY AND EFFICIENT USE OF)
ENERGY ACTS,)
)
NEW MEXICO GAS COMPANY,)
)
Applicant.)
_____)

Case No. 14-00273-UT

AFFIDAVIT OF HEIDI PITTS

STATE OF NEW MEXICO)
)ss.
COUNTY OF SANTA FE)

I, HEIDI PITTS, do hereby swear, depose and state as follows:

I hereby attest that I have read the foregoing **DIRECT TESTIMONY OF HEIDI PITTS**, and the statements contained therein are true and accurate to the best of my knowledge and information.

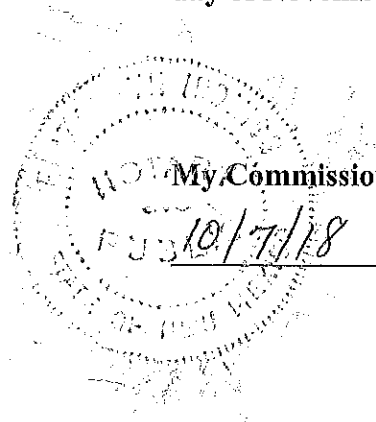
Heidi Pitts
HEIDI PITTS

11-25-14
DATE

SUBSCRIBED AND SWORN TO AND ACKNOWLEDGED before me this 25th
day of November, 2014.

Cyrene Addins
NOTARY PUBLIC

My Commission Expires:
10/7/18



NEW MEXICO
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FILED

IN THE MATTER OF THE APPLICATION
OF NEW MEXICO GAS COMPANY FOR
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RIDER PURSUANT TO THE NEW MEXICO
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ENERGY ACTS,

NEW MEXICO GAS COMPANY,

Applicant.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copy of the foregoing *Direct Testimony of Heidi M. Pitts*, issued on November 25, 2014, was sent on November 25, 2014, as indicated below, to the following:

Via Email:

Rebecca Carter	Rebecca.carter@nmgco.com ;
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Joanne Reuter	joannecreuter@comcast.net
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NEW MEXICO PUBLIC REGULATION COMMISSION


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