

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF PUBLIC SERVICE COMPANY OF)	
NEW MEXICO FOR APPROVAL OF)	Case No. 12-00007-UT
RENEWABLE ENERGY RIDER NO. 36)	
PURSUANT TO ADVICE NOTICE NO. 439)	
AND FOR VARIANCES FROM CERTAIN)	
FILING REQUIREMENTS)	
)	
PUBLIC SERVICE COMPANY OF)	
NEW MEXICO,)	
Applicant.)	
_____)	

**PUBLIC SERVICE COMPANY OF NEW MEXICO’S RESPONSE TO
STAFF’S FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

Public Service Company of New Mexico (“PNM”) hereby responds to the First Set of Interrogatories and Requests for Production of Documents (“Requests”) by the Utility Division Staff (“Staff”) of the New Mexico Public Regulation Commission (“NMPRC” or “Commission”).

GENERAL OBJECTION

PNM objects to Staff’s instructions and directions to the extent they seek to supplement or modify the requirements of 17.1.2.28 NMAC, et seq. or the Rules of Civil Procedure for the District Courts of New Mexico.

PNM objects to the Staff’s Requests to the extent they seek information protected from disclosure by the attorney-client privilege or the work product doctrine. Rules 1-026 and 11-503 NMRA 2000; 1.2.28.C NMAC.

In responding to these Requests, PNM reserves all evidentiary objections to any responses or documents that may be offered in evidence in this proceeding.

PNM responds to these Requests subject to, and without waiving, these

objections.

STAFF INTERROGATORY/ REQUEST FOR PRODUCTION 1-1:

Identify and provide all schedules, workpapers and models informally provided to Staff in this case.

RESPONDENT: Shauna Lovorn-Marriage

RESPONSE: Please see PNM Exhibits Staff 1-1a through 1-1k, which are being provided in response to this Interrogatory as excel files on the attached CD.

PUBLIC SERVICE COMPANY OF NEW MEXICO

By 

Benjamin Phillips, Associate General Counsel
Public Service Company of New Mexico
Alvarado Square, MS-1200
Albuquerque, NM 87158
Telephone: (505) 241-4836
Fax: (505) 242-2883
Ben.Phillips@pnmresources.com

Patrick T. Ortiz
Cuddy & McCarthy, LLP
1701 Old Pecos Trail
P.O. Box 4160
Santa Fe, New Mexico 87502-4160
Phone: (505) 954-7323
Fax: (505) 954-7373
portiz@cuddymccarthy.com

Attorneys for Public Service Company of New Mexico

GCG # 514201

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE APPLICATION)
OF PUBLIC SERVICE COMPANY OF)
NEW MEXICO FOR APPROVAL OF) Case No. 12-00007-UT
RENEWABLE ENERGY RIDER NO. 36)
PURSUANT TO ADVICE NOTICE NO. 439)
AND FOR VARIANCES FROM CERTAIN)
FILING REQUIREMENTS)
)
PUBLIC SERVICE COMPANY OF)
NEW MEXICO,)
 Applicant.)
_____)

AFFIDAVIT

STATE OF NEW MEXICO)
) ss
COUNTY OF BERNALILLO)

Shauna Lovorn-Marriage, Director of Cost of Service and Pricing for Public Service Company of New Mexico, upon being duly sworn according to law, under oath, deposes and states: That she has read the following Public Service Company of New Mexico’s Responses and Objections to Staff’s First Set of Interrogatories and Requests for Production of Documents:

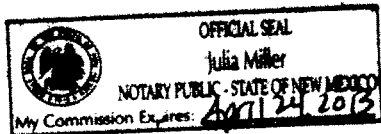
INTERROGATORY STAFF 1-1

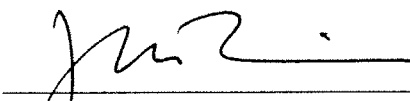
She further affirmatively states that she knows the contents thereof and that they are true and correct to the best of her knowledge and belief.

SIGNED this 9th day of April, 2012.


SHAUNA LOVORN-MARRIAGE

SUBSCRIBED AND SWORN to before me this 9th day of April, 2012.




NOTARY PUBLIC IN AND FOR
THE STATE OF NEW MEXICO

My Commission Expires:

April 24, 2013

GCG # 514115-v2

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE APPLICATION)
OF PUBLIC SERVICE COMPANY OF NEW)
MEXICO FOR APPROVAL OF RIDER NO. 36)
FOR RECOVERY OF RENEWABLE)
ENERGY COSTS)
)
)
**PUBLIC SERVICE COMPANY OF NEW)
MEXICO,)
)
)
Applicant.)****

Case No. 12-000007-UT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of **Public Service Company of New Mexico's Public Service Company of New Mexico's Objections and Responses to Staff's First Set of Interrogatories & Request for Production of Documents** with a CD of the exhibits was mailed first-class, postage-paid, on April 11, 2012 to the following persons whose mailing addresses are listed below and emailed without the CD of the exhibits to those persons at the email only addresses shown below:

Benjamin Phillips, Esq.
PNM Resources, Inc.
Alvarado Square, MS-1200
Albuquerque, NM 87158
Ben.phillips@pnmresources.com

Peter J. Gould, Esq.
PO Box 34127
Santa Fe, NM 87594-4127
pgouldlaw@gmail.com

Jeff Taylor
Assistant Attorney General
Post Office Box 1508
Santa Fe, NM 87504-1508
jtaylor@nmag.gov
lmartinez@nmag.gov

Patrick T. Ortiz, Esq.
Cuddy & McCarthy, LLP
PO Box 4160
Santa Fe, NM 87502-4160
POrtiz@cuddymccarthy.com

Steven S. Michel, Esq.
John Curl
Western Resource Advocates
409 E. Palace Ave., Unit 2
Santa Fe, NM 87501
smichel@westernresources.org
jcurl@westernresources.org

Nann M. Winter, Esq.
P.O. Box 528
302 8th St. NW, Ste. 200
Albuquerque, NM 87103
nwinter@stelznerlaw.com

Charles F. Noble, Esq.
CCA
409 E. Palace Avenue, Unit 2
Santa Fe, NM 87501
c-m-k@msn.com

Thomas J. Wander
Manager, Regulatory Projects
PNMR Services Co.
Alvarado Square, MS-0810
Albuquerque, NM 87158
thomas.wander@pnmresources.com

Patrick Griebel, Esq.
Albuquerque Business Law, P.C.
1803 Rio Grande Blve. NW, Suite B
Albuquerque, New Mexico 87104
patrick@abqbizlaw.com

Hand Deliver To:
Dwight Lamberson
NMPRC
1120 Paseo de Peralta
Santa Fe, NM 87504
Dwight.Lamberson@state.nm.us

Hand Deliver To:
Ryan Jerman, Esq.
NMPRC
1120 Paseo de Peralta
Santa Fe, NM 87501
ryan.jerman@state.nm.us

Hand Deliver To:
James Brack
NMPRC – Utility Division
1120 Paseo De Peralta
Santa Fe, NM 87501
Jim.Brack@state.nm.us

Hand Deliver To:

Nancy Burns
NMPRC – Utility Division
1120 Paseo De Peralta
Santa Fe, NM 87501
Nancy.Burns@state.nm.us

E-Mailed Only to:

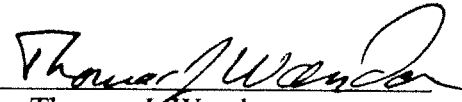
Glenda Murphy
gmurphy@westernresources.org

David Griscom – CCAE
Davidgriscom@gmail.com

Bill Payne
bpayne37@comcast.net

Dated this 11th day of April, 2012.

By:



Thomas J. Wander
Manager, Regulatory Projects