

**M-S-R PUBLIC POWER AGENCY  
MEMORANDUM**

**Date:** April 29, 2021  
**To:** M-S-R PPA Technical Committee  
**From:** Martin R. Hopper, General Manager  
**Subject:** Thursday, February 4, 2021, M-S-R PPA Technical Committee Meeting

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Please find enclosed the agenda for the Thursday, May 6, 2021, M-S-R PPA Technical Committee Meeting to be held remotely at 10:00 AM. Please post as required for Brown Act compliance.

Distribution:

Delilah Morrow – NCI  
Steve Gross – General Counsel  
Toxie Burriss – MID  
Martin Caballero – MID  
Amy Santos – MID  
Cindy Worley – MID  
Basil Wong – SVP  
Steve Hance – SVP  
Paulo Apolinario – SVP  
Ann Hatcher – SVP  
Yanmei Qiu – SVP  
Nathan Aronson – Redding  
Steve Handy – Redding  
Kamryn Hutson – Redding

# M-S-R Public Power Agency

## MEETING OF THE TECHNICAL COMMITTEE

Thursday, May 6, 2021, 10:00 AM

WEBINAR DIGITAL PLATFORM OR PHONE MEETING

GoTo Meeting Information:

<https://global.gotomeeting.com/join/215405941>

**Telephonic Only:**

United States: [+1 \(312\) 757-3121](tel:+13127573121)

**Access Code: 215-405-941**

## AGENDA

M-S-R Public Power Agency meetings are currently being conducted via webinar for all representatives pursuant to Executive Orders signed by Governor Gavin Newsom related to the ongoing COVID-19 pandemic. Members of the public may join the Committee meeting by utilizing GoTo Meeting's webinar feature or through a phone line provided in the meeting agenda. Members of the public will continue to have the opportunity to provide public input via the webinar or phone features. Members of the public may also email their comments to the General Manager by 3 p.m. on the day prior to the Committee meeting. Public comment can be emailed to [msr.general.manager@gmail.com](mailto:msr.general.manager@gmail.com). All public comments submitted by email on time will be read during the Committee meeting in the public input section of the agenda. Any member of the public who desires to address the Committee on any item considered by the Committee at this meeting before or during the Committee's consideration of that item shall so advise the Chair and shall thereupon be given an opportunity to do so.

1. Call to Order
2. Roll Call
3. *Approval of Minutes of October 15, 2020 and February 4, 2021 Meetings* (attached)
4. General Manager Reports (attached, Martin Hopper)
5. Big Horn Wind Energy Project Operating Statistics (attached, Martin Hopper)
6. May 2021 Status Report Regarding WREGIS REC Transfers (attached, Martin Hopper)
7. *Discussion and Possible Action Regarding May 2021 Outside Services Budget Versus Actual Report* (attached)

**8. Closed Session**

- a. Existing Litigation: Government Code §54956.9 (d)(1) – 3 Cases (NM-PRC 20-00222-UT, BP-20E-BPA, BP-22-BPA)
  - b. Threat To Public Services Or Facilities: Government Code § 54957 (a)
  - c. Conference with Real Property Negotiator Pursuant to Government Code Section 54956.8, Property: Lake and River Stations and connecting pipelines and rights-of-way, CR 6800 N, Waterflow, NM 87421. Negotiating Parties: Public Service Company of New Mexico and United States Bureau of Reclamation. Agency Negotiators: Martin Hopper, General Manager and Steve Gross, General Counsel. Under Negotiation: Purchase/Sale/Exchange/Lease of Real Property (provisions, price and terms of payment)
- 9. Announcement from Closed Session
  - 10. Member Reports
  - 11. Public Comment
  - 12. *Confirm date and time of next meeting*
  - 13. Adjourn

ALTERNATE FORMATS OF THIS AGENDA WILL BE MADE AVAILABLE UPON REQUEST TO QUALIFIED INDIVIDUALS WITH DISABILITIES.
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DRAFT MINUTES OF THE  
M-S-R PUBLIC POWER AGENCY  
TECHNICAL COMMITTEE  
OCTOBER 15, 2020

The M-S-R Public Power Agency (M-S-R PPA) Technical Committee held a special meeting on October 15, 2020 via webinar. A list of the attendees is provided as Attachment 1. Mr. Hopper chaired the meeting.

Roll Call/Call to Order

The following M-S-R Members were represented: Modesto Irrigation District – Toxie Burriss, City of Santa Clara – Basil Wong, City of Redding – Kamryn Hutson. The meeting was called to order at 10:05 a.m.

Closed Session Conference with Legal Counsel

M-S-R PPA Technical Committee retired to closed session at 10:06 a.m. pursuant to Government Code §54956.9(d)(1) – Conference with Legal Counsel – 2 cases of Existing Litigation (BP-20E-BPA and BP-22-BPA.)

Announcement from Closed Session

Upon returning to open session at 1:16 p.m., Mr. Scanlon reported that there were no reportable actions.

Member Reports

Mr. Hopper solicited reports from the Members and received none.

Public Comment

Mr. Hopper solicited comment from the public and received none.

Next Meeting

The next regular meeting date will be at 9:00 a.m. on November 5, 2020 and will be held virtually due to public health considerations. The meeting was adjourned at 1:17 p.m.

Respectfully submitted.

Martin R. Hopper  
General Manager

ATTENDANCE LIST  
M-S-R PUBLIC POWER AGENCY  
TECHNICAL COMMITTEE  
REGULAR MEETING

October 15, 2020  
10:05 AM

<u>NAME</u>	<u>STATUS</u>	<u>ORGANIZATION</u>
Toxie Burriss	Member	Modesto
Basil Wong	Member	Santa Clara
Kamryn Hutson	Member	Redding
Nate Aronson	Guest	Redding
Martin Hopper	Chair	General Manager
Pete Scanlon	Guest	FERC Counsel

DRAFT

DRAFT MINUTES OF THE  
M-S-R PUBLIC POWER AGENCY  
TECHNICAL COMMITTEE  
FEBRUARY 4, 2021

The M-S-R Public Power Agency (M-S-R PPA) Technical Committee held a special meeting on February 4, 2021 via webinar. A list of the attendees is provided as Attachment 1. Mr. Hopper chaired the meeting.

Roll Call/Call to Order

The following M-S-R Members were represented: Modesto Irrigation District – Toxie Burriss, City of Santa Clara – Basil Wong, and City of Redding – Kamryn Hutson. The meeting was called to order at 10:03 a.m.

Approval of Minutes

Upon a motion by Mr. Burriss, seconded by Mr. Wong, the minutes of the meeting held on November 6, 2020 were approved unanimously on the call of the roll.

General Manager Report

The General Manager briefly reviewed his November 2020 through January 2021 reports included in the package covering October 2020 through December 2020 activities. The Committee noted and filed the reports.

Big Horn Operating Statistics Report

Mr. Hopper reviewed information regarding expected and average production and curtailment statistics. He noted the continued high levels of generation for both Big Horn I and Big Horn II. Mr. Hopper then made a presentation regarding the accumulation of Residual Energy under the Big Horn I Shaping and Firming Agreement. The root causes of the current accumulation appear to be a combination of high energy production following a historic low forecast and resulting caps on the maximum periodic delivery rates for firmed and shaped energy. Three potential actions were identified including continued monitoring, negotiating changes in the delivery limits, or cashing-out Residual Energy balances. The consensus of the Committee was to monitor for the present time and Mr. Hopper indicated

he will add Residual Energy tracking to the monthly Big Horn Statistics reports. The Committee then noted and filed the report.

#### WREGIS REC Status Report

Mr. Hopper reported that all transfers are currently meeting their expected delivery schedules. The Committee noted and filed the report.

#### Outside Services Budget versus Actual Report

Mr. Hopper indicated that the fiscal year 2020 activities tracked cost expectations and budget refunds will be trued-up in March. Fiscal year 2021 does not yet have any activity to report and is presented only to show format modifications made to the reports. The Committee noted and filed the report.

#### San Juan Generating Station Continuing Coverage Insurance

Mr. Hopper reviewed the draft report reviewing the Continuing Coverage insurance program regarding the Agency's former interests in the San Juan Generating Station. The report covered current insurance coverages and costs, potential theories of liability, and alternate means to mitigate liability. He explained that although M-S-R PPA found it economic to elect to participate in Continuing Coverage insurance in 2017, not all portions of this program remain economic given diminishing liabilities faced by the Agency. He recommended termination of certain insurance coverage and an assumption of some remaining risks through self-insurance. Mr. Gross noted he had reviewed potential exposures and with the caveat that he is not licensed in New Mexico, agrees the Agency's risks are minimal. It was moved by Representative Burriss and seconded by Alternate Representative Hutson to recommend the Commission approve the termination of General Liability and the retention of Environmental Liability Continuing Coverage insurance. On the call of the roll, the motion carried unanimously.

#### Ten-Year Resource Cost Forecasts

Mr. Hopper reviewed the forecasted expenditures for Legacy Liability activities and projected costs for the Big Horn I and Big Horn II Wind Energy Projects for the next ten-years. The forecast assumptions and limitations of the report were reviewed. Mr. Hopper

indicated the forecasts will be shared electronically with the Members. The Committee noted and filed the report.

#### Closed Session Conference with Legal Counsel

M-S-R PPA Technical Committee retired to closed session at 11:24 p.m. pursuant to Government Code §54956.9(d)(1) – Conference with Legal Counsel – 3 cases of Existing Litigation (NM-PRC 20-00222-UT, BP-20E-BPA and BP-22-BPA), pursuant to Government Code §54957(a) – Threat to Public Services or Facilities, and Conference with Real Property Negotiator Pursuant to Government Code Section 54956.8, Property: Lake and River Stations and connecting pipelines and rights-of-way, CR 6800 N, Waterflow, NM 87421. Negotiating Parties: Public Service Company of New Mexico and United States Bureau of Reclamation. Agency Negotiators: Martin Hopper, General Manager and Steve Gross, General Counsel. Under Negotiation: Purchase/Sale/Exchange/Lease of Real Property (provisions, price and terms of payment).

#### Announcement from Closed Session

Upon returning to open session at 12:52 p.m., Mr. Gross reported that there were no reportable actions.

#### Member Reports

Mr. Hopper solicited reports from the Members and received none.

#### Public Comment

Mr. Hopper solicited comment from the public and received none.

#### Next Meeting

The next regular meeting date will be at 10:00 a.m. on May 6, 2021 and will be held virtually due to public health considerations. The meeting was adjourned at 12:56 p.m.

Respectfully submitted.

Martin R. Hopper  
General Manager

ATTENDANCE LIST  
M-S-R PUBLIC POWER AGENCY  
TECHNICAL COMMITTEE  
REGULAR MEETING

February 4, 2021  
10:03 AM

<u>NAME</u>	<u>STATUS</u>	<u>ORGANIZATION</u>
Toxie Burriss	Member	Modesto
Basil Wong	Member	Santa Clara
Paulo Apolinario	Guest	Santa Clara
Kamryn Hutson	Alternate	Redding
Joseph Bowers	Guest	Redding – through Big Horn discussions only
Martin Hopper	Chair	General Manager
Steve Gross	Guest	General Counsel
Pete Scanlon	Guest	BPA Counsel – attending Closed Session only

DRAFT

## **M-S-R Public Power Agency Staff Report**

**Date:** April 27, 2021  
**From:** Martin R. Hopper, General Manager  
**To:** M-S-R PPA Technical Committee  
**Subject:** General Manager Reports

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Please find attached General Manager reports as provided to the Commission or Commissioners as follows:

- February 2021 – Covering January 2021 Activities
- March 2021 ■ Covering February 2021 Activities
- April 2021 – Covering March 2021 Activities

Macintosh HD:Users:martinhopper:My Laptop Documents:M-S-R Public Power Agency:Administrative:Staff Reports:Staff Report re General Manager Reports.doc

## **M-S-R Public Power Agency Staff Report**

**Date:** February 10, 2021  
**From:** Martin R. Hopper, General Manager  
**To:** M-S-R PPA Commission  
**Subject:** February 2021 General Manager Report

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### **Overview:**

This report will provide an overview of the General Manager's major activities and those of specified Agency contractors and consultants. Based on feedback from Commissioners and interested parties, the format and content of these reports will evolve.

### **General Manager:**

#### Administrative Activities – January 2021 (Approx. 38 hours)

The General Manager reviewed and approved Check Requests prepared by the Administrative Assistant and updated Budget v. Actuals Reports.

Prepared for and conducted monthly status call with Commission President.

Continued coordination with contractor regarding website overhaul project. Reviewed initial drafts and implemented e-mail migration.

Prepared 2021 Budget v. Actual tracking models re Legal and Consulting, and Legacy Liabilities.

Prepare PPA & EA Technical C'tee packages for February 4, 2021 meetings.

Review draft MID Preliminary Official Statement section regarding M-S-R projects and activities and provide mark-ups regarding the same.

Participated in CMUA Capitol Day and Board virtual meetings. Included briefings on legislative and regulatory matters for coming year.

Prepared 10-Year Resource Cost forecasts for Legacy Liability and Big Horn Wind Energy Projects.

The General Manger also provided direction to consultants and counsel re emergent filings and regulatory matters. Reports on reclamation issues, decommissioning activities, and project status were requested and prepared.

Project Activities:

San Juan – January 2021 (Approx. 61 hours):

Detailed review of Continuing Coverage insurance program with PNM and corresponding requirements of Restructuring, Reclamation and Decommissioning Agreements regarding liability, indemnity and insurance provisions. Revised drafts and coordinated review by Counsel and Insurance Broker. Prepared draft report and recommendations re same for consideration by Technical Committee.

Reviewed filings regarding proposed PNM/Avangrid merger. Attended (telephonic) meetings with PNM/Avangrid regarding proposed merger. Research and draft cites re Reply Brief to Bernallio County objection to M-S-R intervention. Initial review of possible testimony with expert witness re SJGS decommissioning and rate-making implications in merger.

Reviewed WSJM Reclamation buyout proposal status and prepared comments re draft Special Counsel report and response to WSJM re issues and conditions. Coordinated same w/ General Counsel.

Attend San Juan Decommissioning C'tee virtual meeting re Evaporation Pond Bonds and update to Decommissioning Study. Coord w/ Hockenson re same.

Big Horn – January 2021 (Approx 23 hours):

Reviewed materials and coordinated with FERC Counsel regarding review of BPA BP-22 Initial Proposal and preparation of expert testimony. Participated in BPA teleconference presentations re same.

Reviewed Big Horn energy production records and trends and updated periodic status reports. Reviewed historic data and prepared presentation regarding Residual Energy accumulation issue pertaining to Big Horn I Wind Energy Project.

Key Meetings – January 2021 (All telephonic)

Commission President, Telephonic, January 6 2021. Key Issues: PNM/Avangrid Merger, San Juan insurance review, and BPA Rate Case economics.

PNM/Avangrid Merger Virtual Workshops, January 11 and 15, 2021. Key Issues: Merger motivations, economics, and environmental considerations.

CMUA Capitol Day and Board Meetings, Telephonic, January 25 and 26, 2021.  
Key Issues: 2021 Legislative and regulatory priorities.

San Juan Decommissioning Committee, Telephonic, January 28, 2021. Key  
Issues: Evaporation Pond Bonds and Decommissioning Study issues.

**General Consultant:**

The General Consultant regularly prepares a summary of his activities as part of his monthly billing process. A copy of General Consultant's February 2021 report is attached regarding 34 hours of support in January regarding San Juan, Renewable, and Administrative issues.

**BPA Consultant:**

A copy of BPA Consultant's February 2021 report regarding December (45 Hours) and January (68 hours) activities regarding BPA Rate Case and Testimony preparation and regarding potential testimony regarding PNM/Avangrid merger (6 hours) is attached.

## **M-S-R Public Power Agency Staff Report**

**Date:** February 1, 2021  
**From:** Alan Hockenson  
**To:** Martin Hopper  
**Subject:** Specific Work Tasks for January 2021

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During January, I spent time working on specific tasks on behalf of the M-S-R Public Power Agency (M-S-R PPA). These activities can be segregated into the categories of Generation, Renewable, and Administrative. There was no activity in the category of Transmission.

Generation (17 hours) – There were three specific lines of activity related to the decommissioning of the San Juan Generating Station (San Juan). All scheduled Reclamation Committee meetings were cancelled.

The San Juan Generating Station Decommissioning Committee (SJDC) finally held a meeting on January 28<sup>th</sup>. This was the first meeting since October 2020. Numerous communications had been conducted with the Decommissioning Agent with input from the General Manager. The Decommissioning Agent, the Public Service Company of New Mexico (PNM), appears to have shifted its approach to decommissioning since the sale of its parent company has been announced. PNM is now treating the decommissioning as it is a retirement order project rather than an investigation on the dismantlement timing options. PNM has initiated an effort to refresh the most recent Decommissioning Study. However, PNM was reminded that it was previously agreed no additional study work would be performed until a formal declaration of decommissioning is made pursuant to the Decommissioning Agreement. As PNM is in the process of changing personnel, a response was deferred until the scheduled meeting at the end of February.

Another ongoing issue is the New Mexico Environmental Department (NMED) requirement of a Surety Bond in conjunction with the water treatment ponds at San Juan. The Agency was invoice for related charges from January 2020 and paid its share under protest. Numerous times PNM was advised to not pay for a Surety Bond in January 2021 unless it was discussed among the San Juan Participants. PNM has not conducted meetings as had been requested but indicated it is making progress with the NMED on this issue. PNM then admitted it had purchased another Surety Bond as requested by the NMED. PNM is anticipating that it may get a partial refund on the Surety Bond cost if NMED agrees with its position. Upon further questioning, PNM staff admitted the requirement of the bonds was to continue to operate San Juan pursuant to the NMED permits. This should lead to a questioning of the validity of these costs when the audit of Decommissioning Work is finally conducted.

The third item of interest is the potential sale of land and facilities for delivery of raw water to the United States Bureau of Reclamation (USBR). PNM staged the negotiations with USBR in two sequential phases, one for the land, and one for the facilities. The transition between phases was anticipated to be at year's end. However, the process is running late and the facilities negotiation phase has not begun.

A brief weekly monitoring of PNM's public activities was undertaken to assure PNM is still willing and capable of performing its duties as the San Juan Decommissioning Agent and living up to its obligations under the Trust Agreements for both Decommissioning and Reclamation. In addition, a viewing of a public presentation by the City of Farmington on the progress of its carbon sequestration project was conducted.

Renewable (15 hours) – Monthly operating data was received from Avangrid Renewables, Inc. (AR), and was reviewed. In addition, an investigation of the variability in month to month energy delivers for 2019 and 2020 was conducted at the request of, and results delivered to, the General Manager. Draft testimony associated with the Bonneville Power Administration (BPA) rate case was reviewed.

The WECC is the key forum for utility discussions and policy determinations in the Western Interconnection. Policies that emanate from the WECC can affect transmission providers and balancing authorities in how business is transacted. The weekly summaries of activities and meetings issued by the WECC were briefly reviewed. I researched the activities of the Federal Energy Regulatory Commission (FERC) to assure I am familiar with the issues of importance to M-S-R PPA.

Administrative (2 hours) – The activity in January was limited to updating the status report on Renewables and reviewing administrative documentation as requested by the General Manager.

All meetings were attended telephonically.

To: Martin Hopper, GM, M-S-R  
From: David Arthur  
Subject: BPA/San Juan updates December-January  
Date: February 4, 2021

December and January were very active months with respect to the BPA BP-22 rate case. In early December BPA published its Initial Proposal (the Proposal) for the BP-22 rate case. For most of the remainder of December I reviewed several hundreds of pages of BPA's testimony.

The Proposal contained a number of far-reaching changes from past BPA proposals:

- Introduction of significant revenue financing (potentially \$450 million over 4 years)
- Introduction of capacity charge(s) for transmission losses
- Suspension of any leasing for long-term BPA transmission asset expenditures
- Declaration that BPA was over leveraged
- Declaration that BPA had nearly exhausted its Federal borrowing authority
- Requesting funding for a major project that has not yet been approved or vetted by customers (Vancouver Control Center-\$500 million project)
- Separation of costs from benefits in violation of BPA's cost causation principle.

In January as a result of these changes and the associated double digit increase in proposed transmission rates, I forwarded to M-S-R's BPA attorney some 200+ data requests. Other customers also made significant data requests during this period. During the middle of January I reviewed BPA's response to hundreds of data requests in preparation for drafting my testimony.

For the remainder of January I drafted and revised my testimony in cooperation with M-S-R's BPA attorney. The testimony is quite extensive and addresses a number of significant issues. It also offers a number of constructive suggestions regarding resolution of issues raised in BPA's testimony.

From time to time during January M-S-R's BPA attorney and I had discussions with representatives from Avangrid regarding our respective concerns with BPA's Proposal. It appears that Avangrid is quite concerned about the extent of BPA's insensitivity to BPA transmission rates, but also is focusing its corporate attention elsewhere. It is uncertain how this may influence their testimony.

Also, during January I reviewed a number of documents regarding the future of the San Juan facility including documents regarding Iberdrola's announced intention to acquire Public Service Company of New Mexico.

Overall January was a very active month with considerable implications for future transmission costs billable to M-S-R by Avangrid.

I spent some 74 hours on M-S-R business (68 hours BPA related, 6 hours San Juan related).

I do not think this level of effort will be required in future months, but I think it was appropriate in January given the severity of BPA's December Proposal.

## **M-S-R Public Power Agency Staff Report**

**Date:** March 22, 2021  
**From:** Martin R. Hopper, General Manager  
**To:** M-S-R PPA Commission  
**Subject:** March 2021 General Manager Report

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### **Overview:**

This report will provide an overview of the General Manager's major activities and those of specified Agency contractors and consultants. Based on feedback from Commissioners and interested parties, the format and content of these reports will evolve.

### **General Manager:**

#### Administrative Activities – February 2021 (Approx. 54 hours)

The General Manager reviewed and approved Check Requests prepared by the Administrative Assistant and updated Budget v. Actuals Reports.

Prepared for and conducted monthly status call with Commission President.

Continued coordination with contractor regarding website overhaul project.

Chaired PPA & EA Technical C'tee February 4, 2021 meetings and prepared and distributed draft (February) and approved (November) minutes.

Review draft MID Preliminary Official Statement section regarding M-S-R projects and activities and provide mark-ups regarding the same.

Prepared Staff Reports for PPA & EA Commission February 17, 2021 meetings and distributed draft (February) and approved (November) minutes.

The General Manger also provided direction to consultants and counsel re emergent filings and regulatory matters. Reports on reclamation issues, decommissioning activities, and project status were requested and prepared.

#### Project Activities:

San Juan – February 2021 (Approx. 69 hours):

Notified PNM of requested changes to M-S-R's Continuing Coverage insurance program with PNM as authorized by Commission.

Reviewed filings regarding proposed PNM/Avangrid merger. Attended (telephonic) meeting with PNM/Avangrid regarding proposed merger and possible settlement. Prepare responses to Hearing Examiner requests re Bernalillo County objection to M-S-R intervention. Initial review of possible testimony with expert witness re SJGS decommissioning and rate-making implications in merger.

Reviewed WSJM Reclamation buyout proposal status and prepared comments re draft Special Counsel (Norton Rose Fulbright) report and response to WSJM re issues and conditions. Coordinated same w/ General Counsel.

San Juan Decommissioning strategy session with PNM re needed actions and agreement requirements.

Big Horn – February 2021 (Approx. 20 hours):

Reviewed materials and coordinated with FERC Counsel regarding review of BPA BP-22 Initial Proposal and preparation of expert testimony. Participated in BPA teleconference presentations re same.

Reviewed Big Horn energy production records and trends and updated periodic status reports. Reviewed historic data and prepared presentation regarding Residual Energy accumulation issue pertaining to Big Horn I Wind Energy Project.

Teleconf mtg w/ Stambler re renewable project status and opportunities.

Key Meetings – February 2021 (All telephonic)

Commission President, Telephonic, February 3 2021. Key Issues: PNM/Avangrid Merger, San Juan insurance review, and BPA Rate Case economics.

PPA & EA Technical Committees, Telephonic, February 4, 2021. Key Issues: PNM/Avangrid Merger, Continuing Coverage Insurance Termination, BPA Rate Case, Big Horn Residual Energy.

SCPPA & TriState, Telephonic, February 11, 2021. Key Issues: San Juan Continuing Coverage Insurance Termination,

PPA & EA Commissions, Telephonic, February 4, 2021. Key Issues: Election of Officers, Investment Policies, and Continuing Coverage Insurance Termination.

San Juan Legal Working Group, Telephonic, February 16, 2021. Key Issues: Scope of additional review by Norton Rose Fulbright re Mine Reclamation liabilities.

PNM/Avangrid Merger Settlement Conference, February 19, 2021. Key Issues: Merger motivations, economics, and environmental considerations.

San Juan Decommissioning Sub-Committee (M-S-R & PNM), Telephonic, February 26, 2021. Key Issues: Decommissioning Agreement and Decommissioning Study issues.

**General Consultant:**

The General Consultant regularly prepares a summary of his activities as part of his monthly billing process. A copy of General Consultant's March 2021 report is attached regarding 30 hours of support in January regarding San Juan, Renewable, and Administrative issues.

## **M-S-R Public Power Agency Staff Report**

**Date:** March 1, 2021  
**From:** Alan Hockenson  
**To:** Martin Hopper  
**Subject:** Specific Work Tasks for February 2021

---

During February, I spent time working on specific tasks on behalf of the M-S-R Public Power Agency (M-S-R PPA). These activities can be segregated into the categories of Generation, Renewable, and Administrative. There was no activity in the category of Transmission.

Generation (17 hours) – There were three specific lines of activity related to the decommissioning of the San Juan Generating Station (San Juan). All scheduled Reclamation Committee meetings were cancelled.

The San Juan Generating Station Decommissioning Committee (SJDC) scheduled for February was cancelled. Instead of this meeting, Rodney Warner of the Public Service Company of New Mexico (PNM) reached out to the Agency and scheduled a meeting with the General Manager to discuss decommissioning issues, and in particular, the required notice of plant closure that would trigger the prescribed schedule to prepare, complete, and execute a Decommissioning Plan. This meeting was held on February 26, 2021 and lasted over two hours. The work effort will be separated into the three distance phases, (1) develop a work scope for a decommissioning plan study and prepare a request for proposal (RFP), (2) awarding a contract for the development/completion of the decommission plan study, and (3) select a decommissioning plan and mobilize decommissioning activities. PNM has disclosed there will be some organizational restructuring that should lead to a better coordination between the San Juan Engineering and Operating Committee and the San Juan Decommissioning Committee. According to a preliminary schedule, PNM has anticipated a plant closure decision could be made by the end of March.

Two other decommissioning issues have made no progress over the month of February. The ongoing issue of a Surety Bond as required by the New Mexico Environmental Department (NMED) has made no progress as New Mexico state employees are immersed in the legislative cycle. Further, no progress has been made with the United States Bureau of Reclamation (USBR) on the sale of the facilities comprising the Lake and River Stations.

A brief weekly monitoring of PNM's public activities was undertaken to assure PNM is still willing and capable of performing its duties as the San Juan Decommissioning Agent and living up to its obligations under the Trust Agreements for both Decommissioning and Reclamation.

Renewable (11 hours) – Monthly operating data was received from Avangrid Renewables, Inc. (AR), and was reviewed. In addition, draft testimony of Dr. Arthur for the Bonneville Power Administration rate case was reviewed.

The WECC is the key forum for utility discussions and policy determinations in the Western Interconnection. Policies that emanate from the WECC can affect transmission providers and balancing authorities in how business is transacted. The weekly summaries of activities and meetings issued by the WECC were briefly reviewed. I researched the activities of the Federal Energy Regulatory Commission (FERC) to assure I am familiar with the issues of importance to M-S-R PPA.

Administrative (2 hours) – The activity in February was limited to reviewing posted materials for the Technical Committee and Commission meetings in February.

All meetings were attended telephonically.

## **M-S-R Public Power Agency Staff Report**

**Date:** April 26, 2021  
**From:** Martin R. Hopper, General Manager  
**To:** M-S-R PPA Commission  
**Subject:** April 2021 General Manager Report

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### **Overview:**

This report will provide an overview of the General Manager's major activities and those of specified Agency contractors and consultants. Based on feedback from Commissioners and interested parties, the format and content of these reports will evolve.

### **General Manager:**

#### Administrative Activities – March 2021 (Approx. 27 hours)

The General Manager reviewed and approved Check Requests prepared by the Administrative Assistant and updated Budget v. Actuals Reports.

Prepared for and conducted monthly status call with Commission President. Follow-up with incoming President regarding operating procedures, emergency coverage and related Succession Plan requirements.

Continued coordination with REU Staff regarding Natural Gas Project review & potential restructuring.

Review and coordinate response to Fitch Ratings data request regarding Natural Gas Project.

Coordinated annual Form 700 filing process and update of necessary software.

The General Manger also provided direction to consultants and counsel re emergent filings and regulatory matters. Reports on project activities and status were prepared as needed.

Project Activities:

San Juan – March 2021 (Approx. 83 hours):

Follow-up with PNM regarding requested changes to M-S-R's Continuing Coverage insurance program with PNM as authorized by Commission.

Identified and interviewed potential expert witnesses regarding PNM/Avangrid merger and impacts on SJGS Decommissioning Requirements and schedules. Coordinated preparation of joint defense agreement with Los Alamos County regarding preparation of testimony by two witnesses. Coordinated lines of questioning for each witness, reviewed and provided supporting documentation, and edited draft reports and testimony. Identified public interest standard issues for witness consideration and opinions.

Reviewed WSJM reclamation activities and year-to-date billings and followed-up with PNM regarding budget implications and impacts on potential buyout.

Continued discussions with PNM and General Consultant regarding Retirement Order for pond remediation bonds and attended (telephonically) Decommissioning Committee meeting regarding same.

Big Horn – March 2021 (Approx. 12 hours):

Reviewed materials and coordinated with BPA Counsel regarding review of BP-22 Initial Proposal and PNGC Settlement proposal. Provided direction to Counsel re same.

Reviewed Big Horn energy production records and trends and updated periodic status reports. Reviewed historic data and modified form of monthly status reports to include tracking of Residual Energy accumulation issue for Big Horn I Wind Energy Project.

Key Meetings – March 2021 (All telephonic)

Commission President, Telephonic, March 3 2021. Key Issues: PNM/Avangrid Merger and NM-PRC hearing processes and presentation of witnesses, BPA Rate Case status, operating procedures and presidential duties in case of emergency.

San Juan Decommissioning Committee, Telephonic, March 25, 2021. Key Issues: Retirement Order regarding evaporation pond removal bonds, Decommissioning Agreement and Decommissioning Study issues.

**General Consultant:**

The General Consultant regularly prepares a summary of his activities as part of his monthly billing process. A copy of General Consultant's April 2021 report is attached regarding 30 hours of support in January regarding San Juan, Renewable, and Administrative issues.

## **M-S-R Public Power Agency Staff Report**

**Date:** April 1, 2021  
**From:** Alan Hockenson  
**To:** Martin Hopper  
**Subject:** Specific Work Tasks for March 2021

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During March, I spent time working on specific tasks on behalf of the M-S-R Public Power Agency (M-S-R PPA). These activities can be segregated into the categories of Generation, Renewable, and Administrative. There was no activity in the category of Transmission.

Generation (16 hours) – There were three specific lines of activity related to the decommissioning of the San Juan Generating Station (San Juan). All scheduled Reclamation Committee meetings were cancelled.

The San Juan Generating Station Decommissioning Committee (SJDC) scheduled for March was held on March 25, 2021. Rodney Warner of the Public Service Company of New Mexico (PNM) has been officially designated as the Decommissioning Agent by PNM. PNM has avoided declaring the plant closure as conceived in the Decommissioning Agreement. Instead, PNM has proposed a resolution that combines the existing Owners obligation to orderly plan for plant closure with the need for a Decommissioning Study pursuant to the Decommissioning Agreement. Several communications, both verbal and by e-mail, were conducted with the General Manager and the Decommissioning Agent over the content of the draft resolution. Specific comments were developed and provided to PNM. The processing of this resolution will continue in April,

Another outstanding issue is the New Mexico Environmental Department (NMED) requirement of a Surety Bond related to operating settling ponds. NMED is open to the concept of a corporate guarantee but does not have staff to oversee that concept. NMED suggested the funding of an independent contractor to provide such oversight. PNM has floated the concept of the Decommissioning participants to fund the contractor. The Agency continues to dispute the cost associated with the Surety Bonds (both 2020 and 2021.)

The final outstanding activity is the sale of the Lake and River Stations to the United States Bureau of Reclamation (USBR). Progress has been slow due to the diligence being conducted by USBR in evaluating the facilities. PNM is confident the process will result in a successful sale of the facilities.

A brief weekly monitoring of PNM's public activities was undertaken to assure PNM is still willing and capable of performing its duties as the San Juan Decommissioning Agent and living up to its obligations under the Trust Agreements for both Decommissioning and Reclamation.

Renewable (13 hours) – Monthly operating data was received from Avangrid Renewables, Inc. (AR), and was reviewed.

In addition, the Interregional Coordination Meeting of the three Regional Transmission Organizations (RTOs) was monitored to assess any implications on the delivery of wind energy from Washington. NorthernGrid has identified eight hours in 2030 to study stress conditions on the transmission system. One of those hours assesses the delivery of energy on the California-Oregon Intertie. The California Independent System Operation (CAISO) has assessed the wildfire risk in Northern California. The purpose of this effort was to identify which transmission lines are critical to maintaining reliability during wildfire conditions. WestConnect is studying the committed uses among its members and seeking information on facilities in Northern California. Finally, NVEnergy has noticed its withdrawal from WestConnect effective January 1, 2022. At that time the WestConnect members in Northern California will no longer be physically connected to the remainder of the WestConnect transmission system.

The WECC is the key forum for utility discussions and policy determinations in the Western Interconnection. Policies that emanate from the WECC can affect transmission providers and balancing authorities in how business is transacted. The weekly summaries of activities and meetings issued by the WECC were briefly reviewed. I researched the activities of the Federal Energy Regulatory Commission (FERC) to assure I am familiar with the issues of importance to M-S-R PPA.

Administrative (1 hour) – The activity in March was limited to updating the status report on Renewables.

All meetings were attended telephonically.

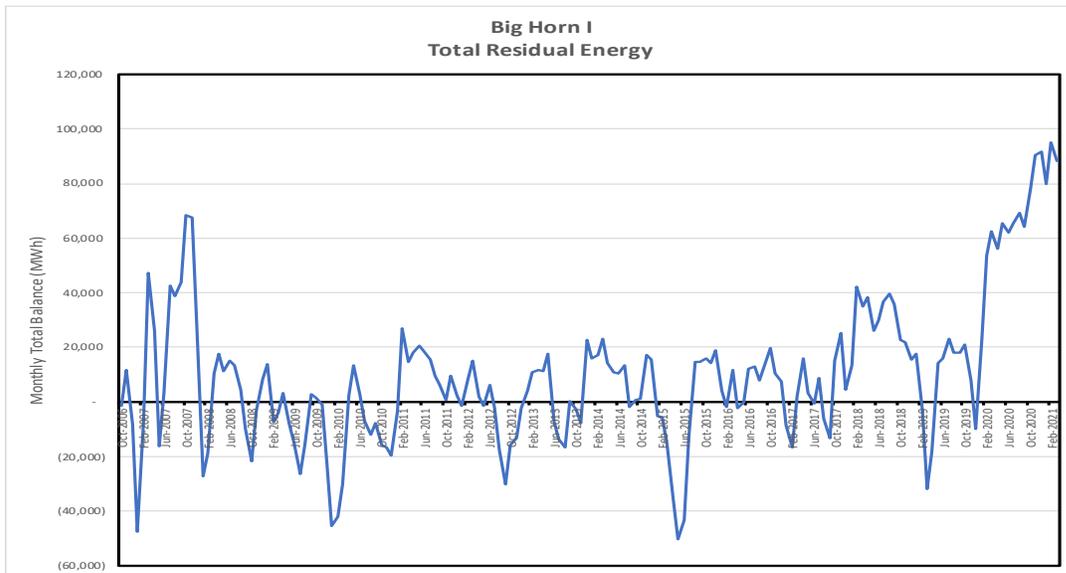
## M-S-R Public Power Agency Big Horn Operations

**Date:** April 14, 2021  
**From:** Martin Hopper, General Manager  
**To:** M-S-R PPA Commission  
**Subject:** Big Horn Operations Statistics

### Energy Production Statistics for the Big Horn Wind Energy Project:

Big Horn I Operations	Production (MWh)	Monthly % of Contract Forecast	Cumulative Wind Year <sup>1</sup> (MWh)	Residual Energy Owing <sup>2</sup> (MWh)
January	25,227	74.3%	177,457	80,017
February	63,904	142.0%	241,361	95,088
March	46,256	95.0%	287,617	88,476
Contract Forecast	N/A	N/A	501,381	N/A
Annual Budget Forecast	N/A	N/A	510,000	N/A
Life of Project	N/A	N/A	7,421,279	N/A

Although February 2021 energy production was the second highest on record, production in March 2021 was slightly below average. The increase in Residual Energy due to February's high production was partially offset due to March's lower production levels.

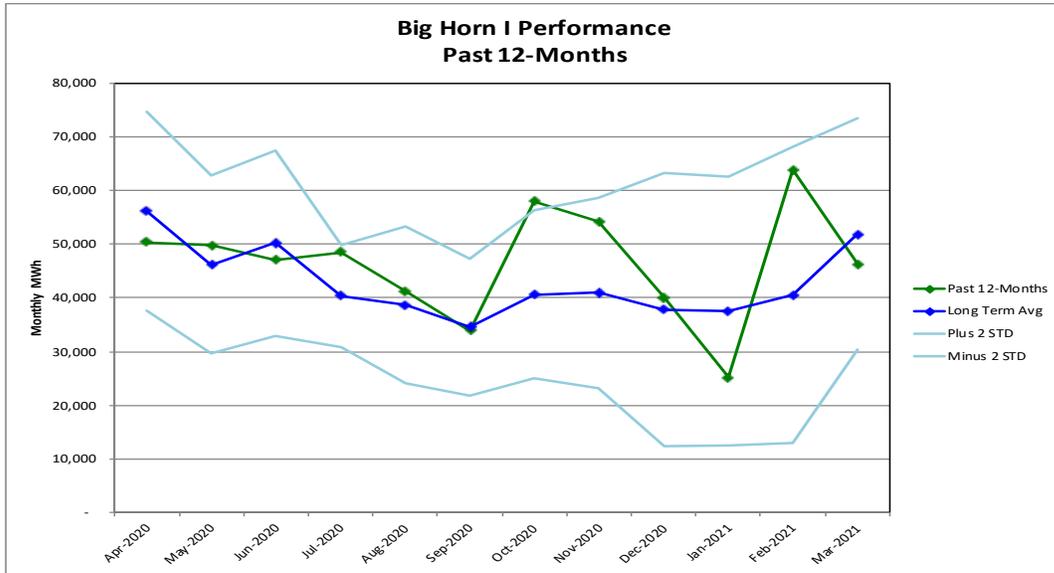


4/14/21

All Time

Big Horn I Residual Accumulations.xlsx

<sup>1</sup> Big Horn I Wind Year runs October 1 through September 30.  
<sup>2</sup> Positive number owed by Avangrid. Negative number owed to Avangrid.



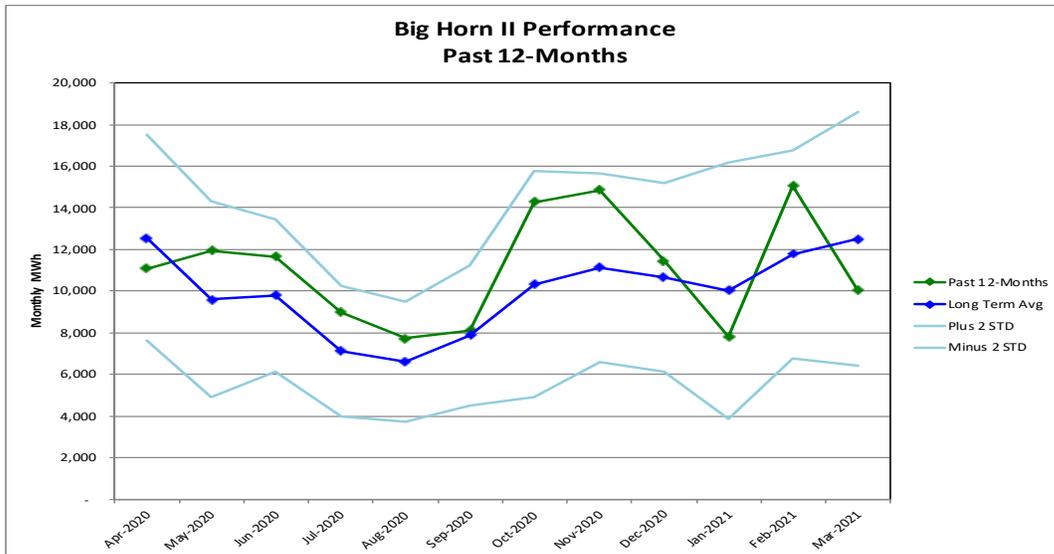
4/8/21

Past 12 Thru Mar 2021

Big Horn I Projections 2021.xlsx

Big Horn II Operations	Production (MWh)	Monthly % of Contract Forecast	Cumulative Wind Year <sup>3</sup> (MWh)
January	7,793	76.5%	34,104
February	15,053	128.0%	45,157
March	10,023	77.6%	55,180
Contract Forecast	N/A	N/A	123,088
Annual Budget Forecast	N/A	N/A	115,000
Life of Project Production	N/A	N/A	1,257,129

While February 2021 production rebounded to the second highest recorded for the month, March production was well below average.



4/8/21

Past 12 Thru Mar 2021

Big Horn II Projections 2021.xlsx

<sup>3</sup> Big Horn II Wind Year runs November 1 through October 31.

**Transmission Curtailments:**

<b>Curtailments</b>	<b>On-Peak (MWh)</b>	<b>Off-Peak (MWh)</b>	<b>Total (MWh)</b>
December	1	38	39
January	16	0	16
February	1	0	1
March	164	182	346
Year To Date	181	182	363
Historic Annual Average	1,316	799	2,115

Curtailments in 2020 were the lowest recorded since 2016 and were 35.5% of the average annual curtailments for the period 2017-2019. February curtailments were di minimus notwithstanding high production levels. However, March curtailments were the highest since July 2020. The curtailments were concentrated on the weekends of March 6/7 and 20/21 due to planned maintenance limiting the COI transfer capability to 1,150 MW.

## **M-S-R Public Power Agency Staff Report**

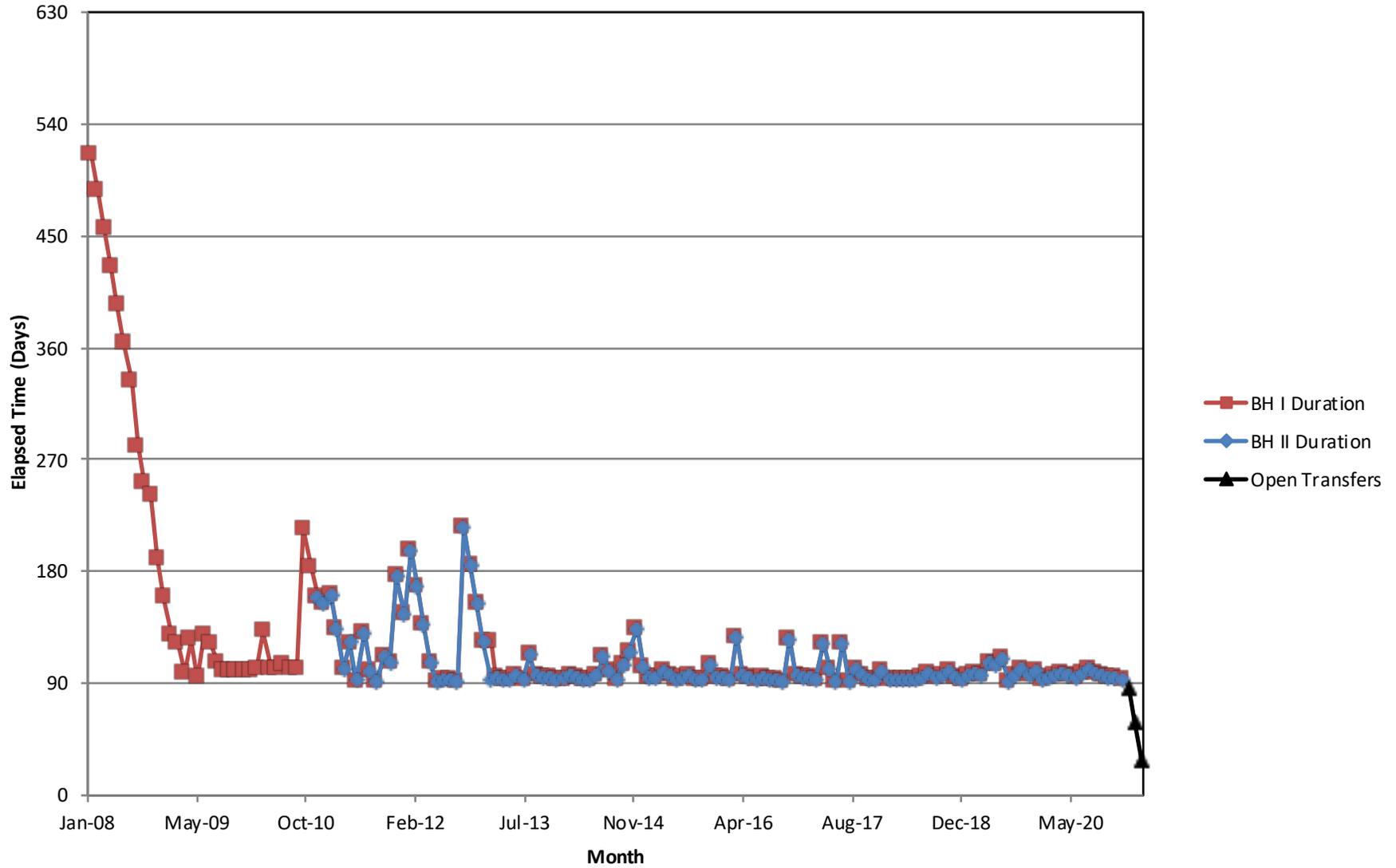
**Date:** April 27, 2021  
**From:** Martin R. Hopper, General Manager  
**To:** M-S-R PPA Commission  
**Subject:** May 2021 WREGIS REC Transfers Status Report

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In 2013, the General Manager met with Iberdrola Renewables, Inc (now Avangrid Renewables, Inc.) regarding the status of its transfers of Western Renewable Energy Generation Information System (WREGIS) Renewable Energy Credits (RECs) for the Big Horn I and Big Horn II Wind Energy Projects to M-S-R PPA. Ideally, the WREGIS timelines would allow transfers of RECs to M-S-R PPA about 90-days after the close of a reporting month. At the time of that meeting, some transfers were as many as 215-days outstanding. Avangrid subsequently reviewed its internal procedures and has generally completed Big Horn I and Big Horn II transfers in a timely manner. The attached chart illustrates current and historic status of REC transfers. As requested by the Commission, this report will be updated and presented at each regular meeting.

I recommend the Commission note and file the May 2021 WREGIS REC Transfers Status Report.

# Big Horn I & II REC Transfers



REC Transfer Timeliness

Month Ending	Big Hom I		Big Hom II		Today's Date	Open Transfers
	Date Transferred to Members	BH I Duration	Date Transferred to Members	BH II Duration		
Jan-08	29-Jun-09	515				
Feb-08	29-Jun-09	486				
Mar-08	29-Jun-09	455				
Apr-08	29-Jun-09	425				
May-08	29-Jun-09	394				
Jun-08	29-Jun-09	364				
Jul-08	29-Jun-09	333				
Aug-08	8-Jun-09	281				
Sep-08	8-Jun-09	251				
Oct-08	29-Jun-09	241				
Nov-08	8-Jun-09	190				
Dec-08	8-Jun-09	159				
Jan-09	8-Jun-09	128				
Feb-09	29-Jun-09	121				
Mar-09	7-Jul-09	98				
Apr-09	2-Sep-09	125				
May-09	2-Sep-09	94				
Jun-09	5-Nov-09	128				
Jul-09	30-Nov-09	122				
Aug-09	15-Dec-09	106				
Sep-09	8-Jan-10	100				
Oct-09	8-Feb-10	100				
Nov-09	10-Mar-10	100				
Dec-09	9-Apr-10	99				
Jan-10	10-May-10	99				
Feb-10	10-Jun-10	102				
Mar-10	10-Aug-10	132				
Apr-10	10-Aug-10	102				
May-10	10-Sep-10	102				
Jun-10	13-Oct-10	105				
Jul-10	9-Nov-10	101				
Aug-10	10-Dec-10	101				
Sep-10	2-May-11	214				
Oct-10	2-May-11	183				
Nov-10	9-May-11	160	9-May-11	160		
Dec-10	3-Jun-11	154	3-Jun-11	154		
Jan-11	11-Jul-11	161	11-Jul-11	161		
Feb-11	11-Jul-11	133	11-Jul-11	133		
Mar-11	11-Jul-11	102	11-Jul-11	102		
Apr-11	29-Aug-11	121	31-Aug-11	123		
May-11	30-Aug-11	91	31-Aug-11	92		
Jun-11	8-Nov-11	131	8-Nov-11	131		
Jul-11	8-Nov-11	100	8-Nov-11	100		
Aug-11	30-Nov-11	91	30-Nov-11	91		
Sep-11	20-Jan-12	112	20-Jan-12	112		
Oct-11	15-Feb-12	107	15-Feb-12	107		
Nov-11	24-May-12	176	24-May-12	176		
Dec-11	24-May-12	145	24-May-12	145		
Jan-12	15-Aug-12	197	15-Aug-12	197		
Feb-12	15-Aug-12	168	15-Aug-12	168		
Mar-12	15-Aug-12	137	15-Aug-12	137		
Apr-12	15-Aug-12	107	15-Aug-12	107		
May-12	30-Aug-12	91	30-Aug-12	91		
Jun-12	1-Oct-12	93	1-Oct-12	93		
Jul-12	31-Oct-12	92	31-Oct-12	92		
Aug-12	30-Nov-12	91	30-Nov-12	91		
Sep-12	3-May-13	215	3-May-13	215		
Oct-12	3-May-13	184	3-May-13	184		
Nov-12	3-May-13	154	3-May-13	154		
Dec-12	3-May-13	123	3-May-13	123		
Jan-13	3-Jun-13	123	3-May-13	92		
Feb-13	3-Jun-13	95	3-Jun-13	95		
Mar-13	2-Jul-13	93	2-Jul-13	93		
Apr-13	31-Jul-13	92	31-Jul-13	92		
May-13	4-Sep-13	96	5-Sep-13	97		
Jun-13	1-Oct-13	93	1-Oct-13	93		
Jul-13	21-Nov-13	113	21-Nov-13	113		
Aug-13	5-Dec-13	96	5-Dec-13	96		
Sep-13	2-Jan-14	94	2-Jan-14	94		
Oct-13	3-Feb-14	95	3-Feb-14	95		
Nov-13	3-Mar-14	93	3-Mar-14	93		
Dec-13	3-Apr-14	93	4-Apr-14	94		
Jan-14	8-May-14	97	8-May-14	97		
Feb-14	3-Jun-14	95	3-Jun-14	95		
Mar-14	2-Jul-14	93	2-Jul-14	93		
Apr-14	31-Jul-14	92	31-Jul-14	92		
May-14	4-Sep-14	96	4-Sep-14	96		
Jun-14	20-Oct-14	112	20-Oct-14	112		

Jul-14	7-Nov-14	99	7-Nov-14	99
Aug-14	2-Dec-14	93	2-Dec-14	93
Sep-14	12-Jan-15	104	12-Jan-15	104
Oct-14	23-Feb-15	115	23-Feb-15	115
Nov-14	13-Apr-15	134	13-Apr-15	134
Dec-14	13-Apr-15	103	13-Apr-15	103
Jan-15	6-May-15	95	6-May-15	95
Feb-15	2-Jun-15	94	2-Jun-15	94
Mar-15	9-Jul-15	100	9-Jul-15	100
Apr-15	5-Aug-15	97	5-Aug-15	97
May-15	1-Sep-15	93	1-Sep-15	93
Jun-15	2-Oct-15	94	2-Oct-15	94
Jul-15	5-Nov-15	97	5-Nov-15	97
Aug-15	2-Dec-15	93	2-Dec-15	93
Sep-15	31-Dec-15	92	31-Dec-15	92
Oct-15	12-Feb-16	104	12-Feb-16	104
Nov-15	3-Mar-16	94	3-Mar-16	94
Dec-15	4-Apr-16	95	4-Apr-16	95
Jan-16	3-May-16	93	2-May-16	92
Feb-16	5-Jul-16	127	5-Jul-16	127
Mar-16	5-Jul-16	96	5-Jul-16	96
Apr-16	3-Aug-16	95	3-Aug-16	95
May-16	1-Sep-16	93	1-Sep-16	93
Jun-16	3-Oct-16	95	3-Oct-16	95
Jul-16	1-Nov-16	93	1-Nov-16	93
Aug-16	1-Dec-16	92	1-Dec-16	92
Sep-16	30-Dec-16	91	30-Dec-16	91
Oct-16	6-Mar-17	126	6-Mar-17	126
Nov-16	6-Mar-17	96	6-Mar-17	96
Dec-16	5-Apr-17	95	5-Apr-17	95
Jan-17	5-May-17	94	5-May-17	94
Feb-17	31-May-17	92	31-May-17	92
Mar-17	31-Jul-17	122	31-Jul-17	122
Apr-17	10-Aug-17	102	10-Aug-17	102
May-17	30-Aug-17	91	30-Aug-17	91
Jun-17	30-Oct-17	122	30-Oct-17	122
Jul-17	30-Oct-17	91	30-Oct-17	91
Aug-17	11-Dec-17	102	11-Dec-17	102
Sep-17	4-Jan-18	96	4-Jan-18	96
Oct-17	31-Jan-18	92	31-Jan-18	92
Nov-17	2-Mar-18	92	2-Mar-18	92
Dec-17	9-Apr-18	99	9-Apr-18	99
Jan-18	4-May-18	93	4-May-18	93
Feb-18	1-Jun-18	93	1-Jun-18	93
Mar-18	2-Jul-18	93	2-Jul-18	93
Apr-18	31-Jul-18	92	31-Jul-18	92
May-18	31-Aug-18	92	31-Aug-18	92
Jun-18	2-Oct-18	94	2-Oct-18	94
Jul-18	6-Nov-18	98	6-Nov-18	98
Aug-18	3-Dec-18	94	3-Dec-18	94
Sep-18	4-Jan-19	96	4-Jan-19	96
Oct-18	7-Feb-19	99	7-Feb-19	99
Nov-18	5-Mar-19	95	5-Mar-19	95
Dec-18	2-Apr-19	92	2-Apr-19	92
Jan-19	7-May-19	96	7-May-19	96
Feb-19	6-Jun-19	98	6-Jun-19	98
Mar-19	5-Jul-19	96	5-Jul-19	96
Apr-19	14-Aug-19	106	14-Aug-19	106
May-19	13-Sep-19	105	13-Sep-19	105
Jun-19	18-Oct-19	110	18-Oct-19	110
Jul-19	30-Oct-19	91	30-Oct-19	91
Aug-19	6-Dec-19	97	6-Dec-19	97
Sep-19	10-Jan-20	102	10-Jan-20	102
Oct-19	5-Feb-20	97	5-Feb-20	97
Nov-19	9-Mar-20	100	9-Mar-20	100
Dec-19	2-Apr-20	93	2-Apr-20	93
Jan-20	5-May-20	95	5-May-20	95
Feb-20	4-Jun-20	96	4-Jun-20	96
Mar-20	7-Jul	98	7-Jul	98
Apr-20	5-Aug	97	5-Aug	97
May-20	3-Sep	95	3-Sep	95
Jun-20	6-Oct	98	6-Oct	98
Jul-20	10-Nov	102	10-Nov	102
Aug-20	7-Dec	98	7-Dec	98
Sep-20	4-Jan	96	4-Jan	96
Oct-20	3-Feb	95	3-Feb	95
Nov-20	5-Mar	95	5-Mar	95
Dec-20	2-Apr	92	2-Apr	92
Jan-21			27-Apr-21	87
Feb-21			27-Apr-21	59
Mar-21			27-Apr-21	28

Note: Rec'd from IRI 3-Mar-15  
Note: Rec'd from IRI 1-Apr-15

Note: Rec'd from IRI 1-Feb-19

## M-S-R Public Power Agency Staff Report

**Date:** April 27, 2021  
**From:** Martin R. Hopper, General Manager  
**To:** M-S-R PPA Commission  
**Subject:** May 2021 Outside Services Budget versus Actual Report

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### **FISCAL YEAR 2021:**

#### Major Legal and Consulting Providers Reporting Are:

Duncan, Weinberg, Genzer, and Pembroke:	Through:	February 28, 2021
Law Offices of Susie Berlin:	Through:	February 28, 2021
Porter Simon:	Through:	March 31, 2021
KBT LLC:	Through:	March 31, 2021

#### Legacy Liability Providers Reporting Are:

PNM – Reclamation Management:	Through:	March 31, 2021
WSJM – Reclamation:	Through:	March 31, 2021
PNM – Decommissioning:	Through:	March 31, 2021

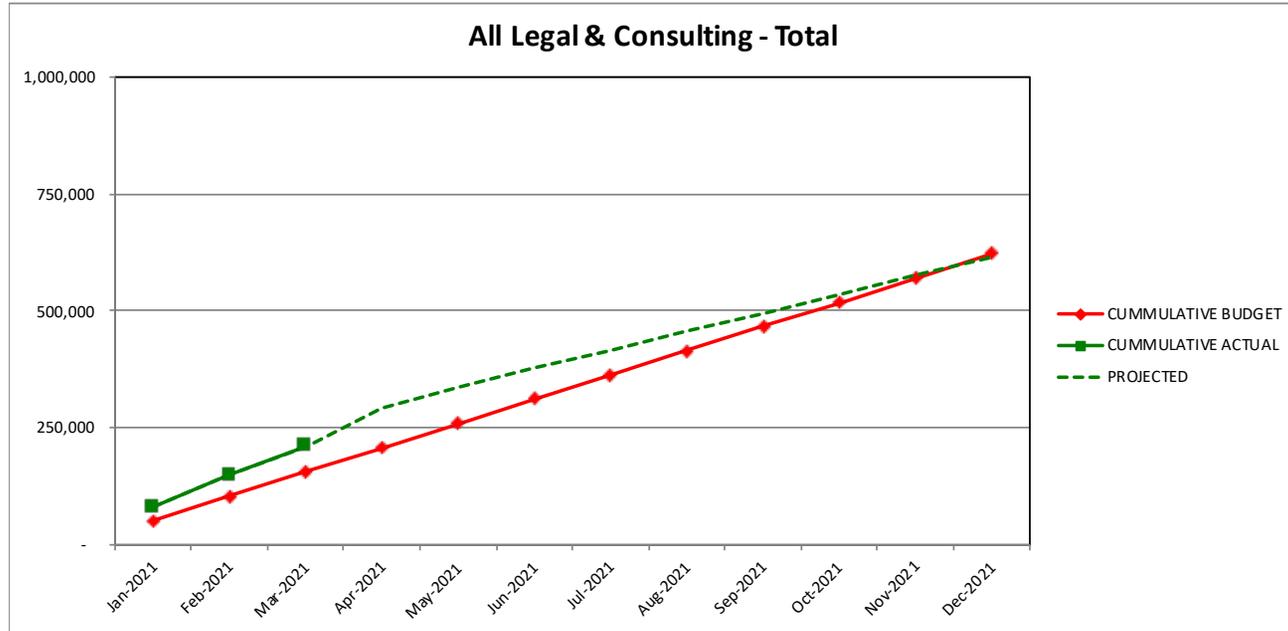
Detailed charts of monthly budget versus actual cost comparisons for each provider are attached. Please note the charts now include projected costs through year-end. Note: Any current period expenditures shown in attachments and printed in ***bold italics*** are estimates. Note: Legacy Liability WSJM Reclamation budget adjusted to revised Annual Operating Plan provided by PNM April 16, 2021.

### **Recommendation:**

I recommend the Commission note and file this report.

## M-S-R PPA All Legal & Consult Summary

Month of: **Mar-2021**



CURRENT MONTH				
By Function	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	5,000	4,976	24	100%
Gen - Other	83	7,375	(7,291)	8850%
Renewables	5,167	4,423	744	86%
Rens - Other	28,750	38,094	(9,344)	133%
Reg & Comp	9,667	5,833	3,833	60%
Administrative	3,167	476	2,691	15%
<b>Total</b>	<b>51,833</b>	<b>61,177</b>	<b>(9,343)</b>	<b>118%</b>

YEAR TO DATE				
By Function	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	15,000	16,320	(1,320)	109%
Gen - Other	250	17,916	(17,666)	7166%
Renewables	15,500	10,155	5,345	66%
Rens - Other	86,250	147,605	(61,355)	171%
Reg & Comp	29,000	15,264	13,736	53%
Administrative	9,500	2,798	6,702	29%
<b>Total</b>	<b>155,500</b>	<b>210,058</b>	<b>(54,558)</b>	<b>135%</b>

CURRENT MONTH				
By Provider	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Duncan	29,167	37,500	(8,333)	129%
Berlin	5,000	5,000	0	100%
Porter Simon	4,000	1,848	2,152	46%
KBT	13,333	9,454	3,879	71%
Others	333	7,375	(7,041)	2212%
<b>Total</b>	<b>51,833</b>	<b>61,177</b>	<b>(9,343)</b>	<b>118%</b>

YEAR TO DATE				
By Provider	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Duncan	87,500	132,717	(45,217)	152%
Berlin	15,000	9,797	5,203	65%
Porter Simon	12,000	7,678	4,322	64%
KBT	40,000	43,042	(3,042)	108%
Others	1,000	16,824	(15,824)	1682%
<b>Total</b>	<b>155,500</b>	<b>210,058</b>	<b>(54,558)</b>	<b>135%</b>

# M-S-R PPA Duncan Summary

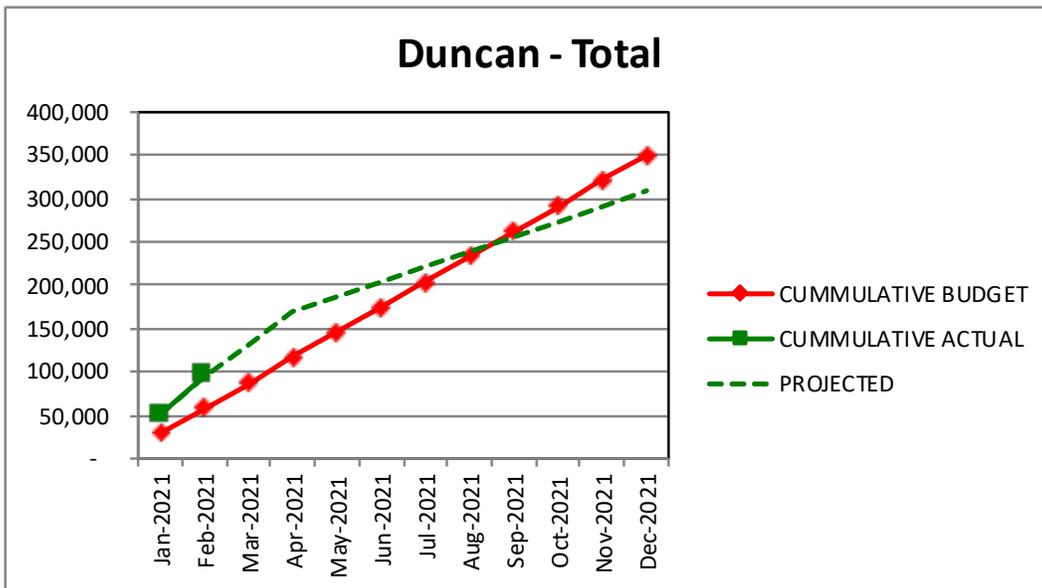
Month of: **Mar-2021**

## CURRENT MONTH

	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	0	0	0	0%
Gen - Other	0	0	0	0%
Renewables	0	0	0	0%
Rens - Other	22,917	<b>35,000</b>	<b>(12,083)</b>	153%
Reg & Comp	6,250	<b>2,500</b>	3,750	40%
Administrative	0	0	0	0%
<b>Total</b>	<b>29,167</b>	<b>37,500</b>	<b>(8,333)</b>	<b>129%</b>

## YEAR TO DATE

	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	0	0	0	0%
Gen - Other	0	0	0	0%
Renewables	0	0	0	0%
Rens - Other	68,750	<b>125,583</b>	<b>(56,833)</b>	183%
Reg & Comp	18,750	<b>7,134</b>	11,616	38%
Administrative	0	0	0	0%
<b>Total</b>	<b>87,500</b>	<b>132,717</b>	<b>(45,217)</b>	<b>152%</b>



# M-S-R PPA Berlin Summary

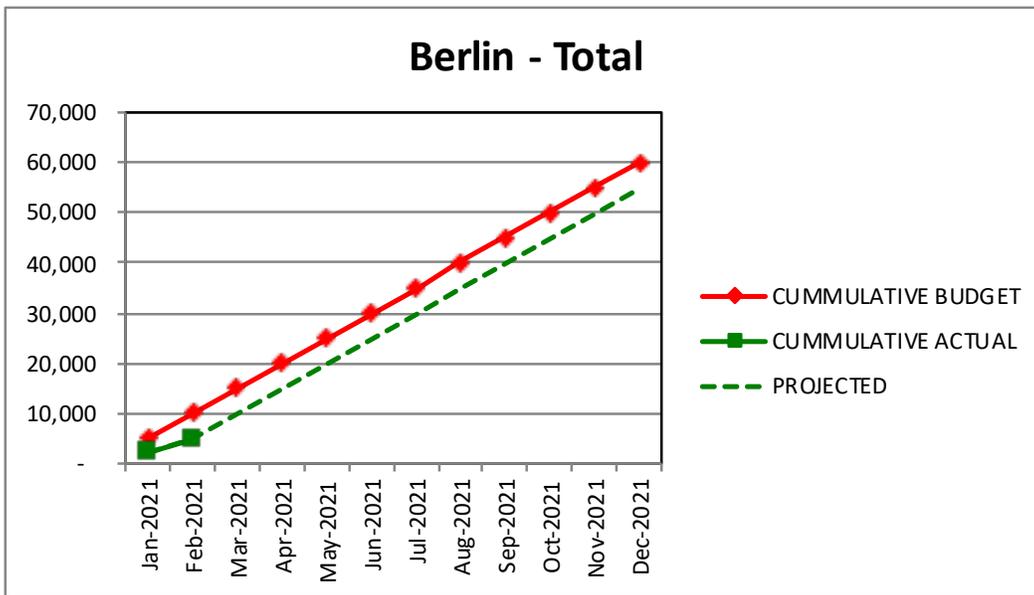
Month of: **Mar-2021**

## CURRENT MONTH

	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	0	0	0	0%
Gen - Other	0	0	0	0%
Renewables	1,667	<b>1,667</b>	0	100%
Rens - Other	0	<b>0</b>	0	0%
Reg & Comp	3,333	<b>3,333</b>	0	100%
Administrative	0	0	0	0%
<b>Total</b>	<b>5,000</b>	<b>5,000</b>	<b>0</b>	<b>100%</b>

## YEAR TO DATE

	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	0	0	0	0%
Gen - Other	0	0	0	0%
Renewables	5,000	<b>1,667</b>	3,333	33%
Rens - Other	0	<b>0</b>	0	0%
Reg & Comp	10,000	<b>8,130</b>	1,870	81%
Administrative	0	0	0	0%
<b>Total</b>	<b>15,000</b>	<b>9,797</b>	<b>5,203</b>	<b>65%</b>



# M-S-R PPA Berlin Summary

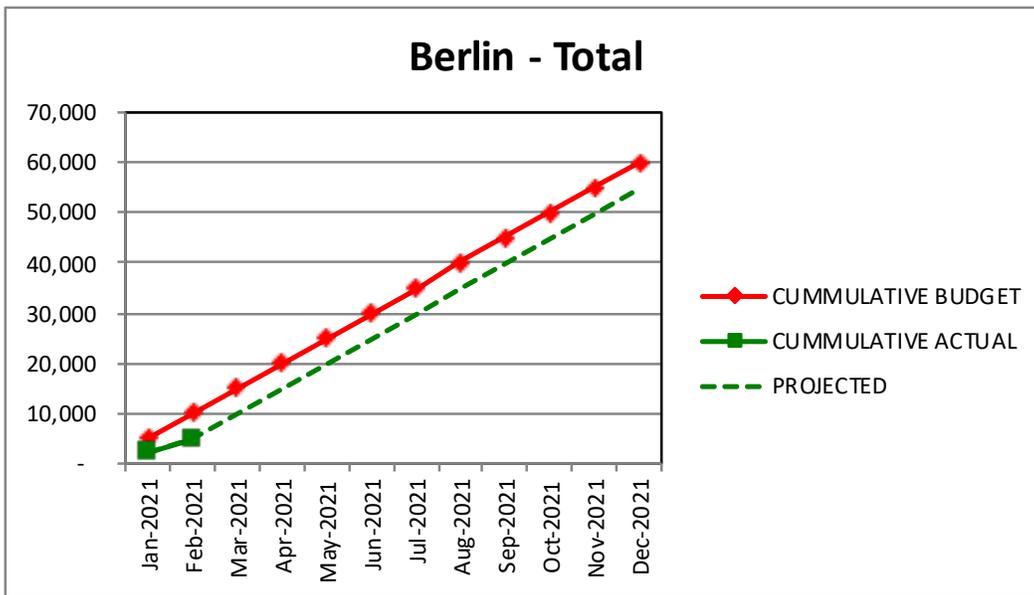
Month of: **Mar-2021**

## CURRENT MONTH

	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	0	0	0	0%
Gen - Other	0	0	0	0%
Renewables	1,667	<b>1,667</b>	0	100%
Rens - Other	0	<b>0</b>	0	0%
Reg & Comp	3,333	<b>3,333</b>	0	100%
Administrative	0	0	0	0%
<b>Total</b>	<b>5,000</b>	<b>5,000</b>	<b>0</b>	<b>100%</b>

## YEAR TO DATE

	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	0	0	0	0%
Gen - Other	0	0	0	0%
Renewables	5,000	<b>1,667</b>	3,333	33%
Rens - Other	0	<b>0</b>	0	0%
Reg & Comp	10,000	<b>8,130</b>	1,870	81%
Administrative	0	0	0	0%
<b>Total</b>	<b>15,000</b>	<b>9,797</b>	<b>5,203</b>	<b>65%</b>



# M-S-R PPA Misc Legal & Consult Summary

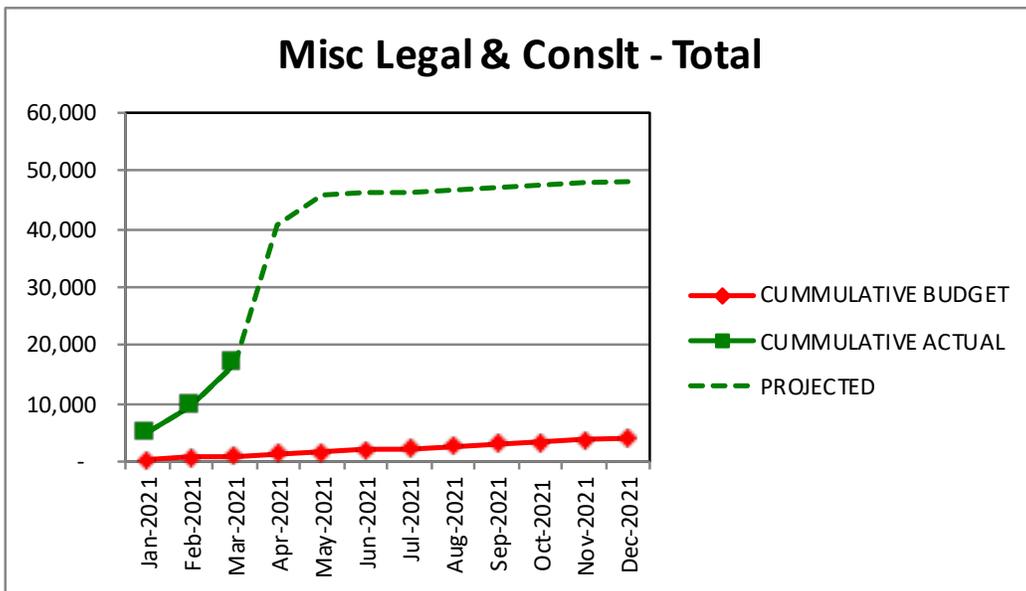
Month of: **Mar-2021**

## CURRENT MONTH

	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	0	0	0	0%
Gen - Other	83	7,375	(7,291)	8850%
Renewables	0	0	0	0%
Rens - Other	0	0	0	0%
Reg & Comp	0	0	0	0%
Administrative	250	0	250	0%
<b>Total</b>	<b>333</b>	<b>7,375</b>	<b>(7,041)</b>	<b>2212%</b>

## YEAR TO DATE

	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	0	0	0	0%
Gen - Other	250	16,824	(16,574)	6730%
Renewables	0	0	0	0%
Rens - Other	0	0	0	0%
Reg & Comp	0	0	0	0%
Administrative	750	0	750	0%
<b>Total</b>	<b>1,000</b>	<b>16,824</b>	<b>(15,824)</b>	<b>1682%</b>



# M-S-R PPA Porter Simon Summary

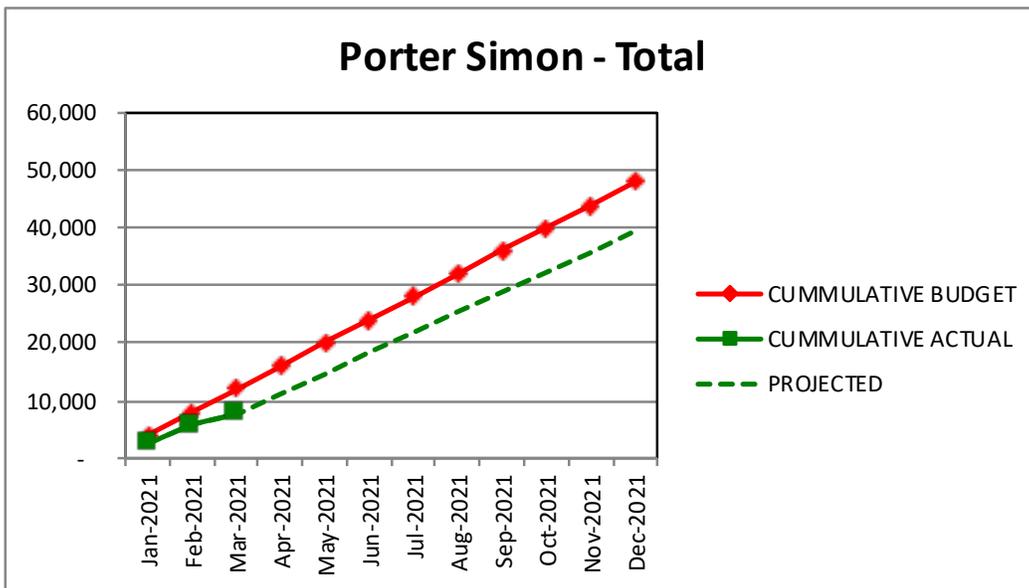
Month of: **Mar-2021**

## CURRENT MONTH

	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	2,083	1,584	499	76%
Gen - Other	0	0	0	0%
Renewables	167	0	167	0%
Rens - Other	0	0	0	0%
Reg & Comp	83	0	83	0%
Administrative	1,667	264	1,403	16%
<b>Total</b>	<b>4,000</b>	<b>1,848</b>	<b>2,152</b>	<b>46%</b>

## YEAR TO DATE

	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	6,250	5,720	530	92%
Gen - Other	0	0	0	0%
Renewables	500	220	280	44%
Rens - Other	0	0	0	0%
Reg & Comp	250	0	250	0%
Administrative	5,000	1,738	3,262	35%
<b>Total</b>	<b>12,000</b>	<b>7,678</b>	<b>4,322</b>	<b>64%</b>



# M-S-R PPA KBT Summary

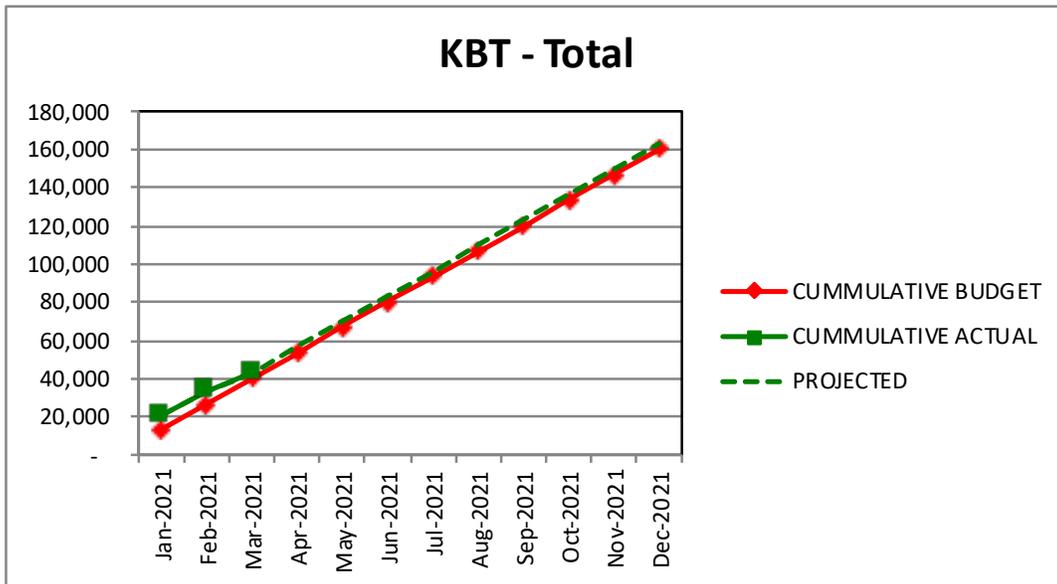
Month of: **Mar-2021**

## CURRENT MONTH

	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	2,917	3,392	(475)	116%
Gen - Other	0	0	0	0%
Renewables	3,333	2,756	577	83%
Rens - Other	5,833	3,094	2,739	53%
Reg & Comp	0	0	0	0%
Administrative	1,250	212	1,038	17%
<b>Total</b>	<b>13,333</b>	<b>9,454</b>	<b>3,879</b>	<b>71%</b>

## YEAR TO DATE

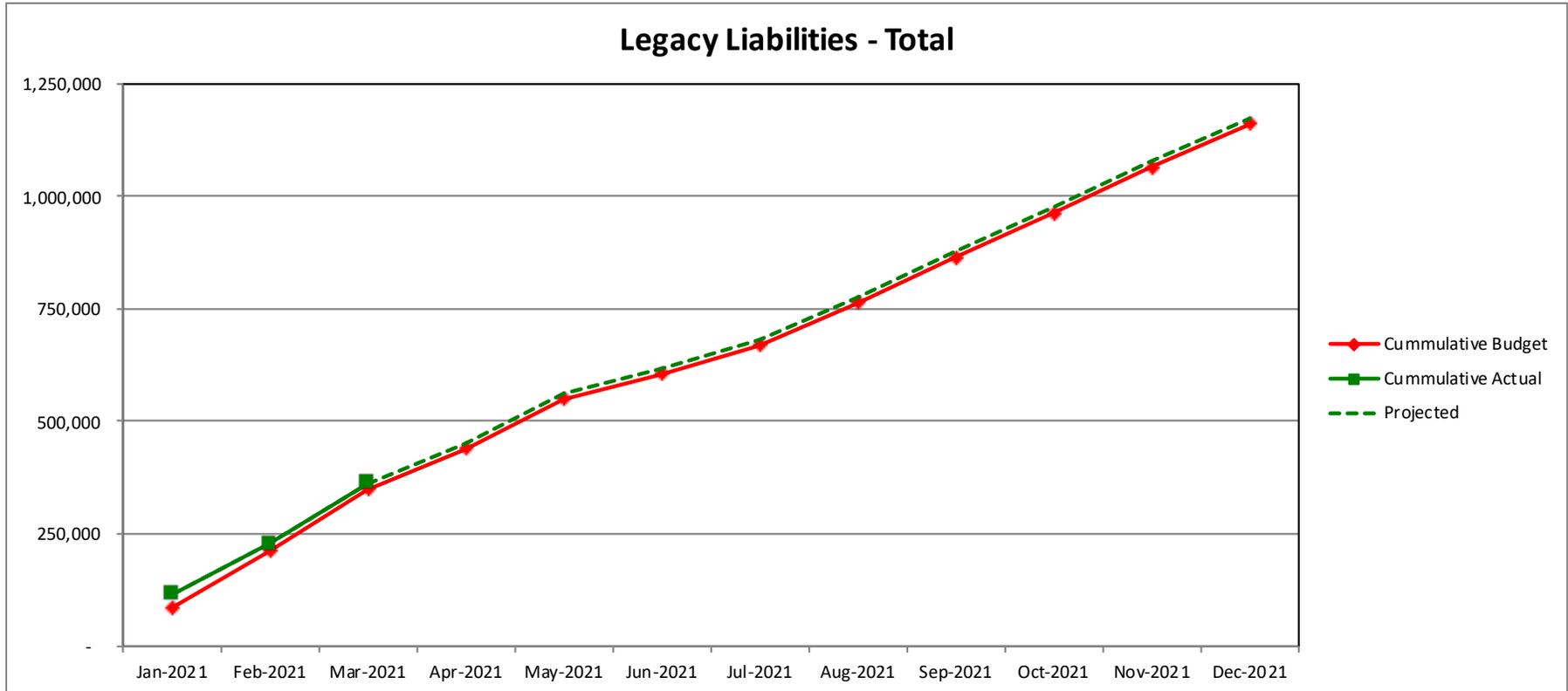
	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	8,750	10,600	(1,850)	121%
Gen - Other	0	1,092	(1,092)	#DIV/0!
Renewables	10,000	8,268	1,732	83%
Rens - Other	17,500	22,022	(4,522)	126%
Reg & Comp	0	0	0	0%
Administrative	3,750	1,060	2,690	28%
<b>Total</b>	<b>40,000</b>	<b>43,042</b>	<b>(3,042)</b>	<b>108%</b>



	2021 Budget	Reallocated Budget	Jan-2021	Feb-2021	Mar-2021	Apr-2021	May-2021	Jun-2021	Jul-2021	Aug-2021	Sep-2021	Oct-2021	Nov-2021	Dec-2021	Total	Average	Year-End Projection	Notes
Legal Costs - 2021			8.33%	16.67%	25.00%	33.33%	41.67%	50.00%	58.33%	66.67%	75.00%	83.33%	91.67%	100.00%				
<b>Italics = Estimates</b>																		
<b>Legal</b>																		
<b>DWG&amp;P</b>																		
<b>Generation</b>																		
SJGS Agreements	-	-	-	-	-	4,000	-	-	-	-	-	-	-	-	4,000	333	4,000	
<b>Renewables</b>																		
BPA/PNW Gen1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
<b>Rens - Other</b>																		
BPA Rate Cases	275,000	275,000	48,455	42,128.26	35,000	30,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000	275,583	22,965	275,583	
<b>Regulatory &amp; Comp</b>																		
FERC Gen1	75,000	75,000	2,343	2,291.00	2,500	2,500	2,500	2,500	2,500	2,500	2,500	2,500	2,500	2,500	29,634	2,470	29,634	
	350,000	350,000	50,798	44,419.26	37,500	36,500	17,500	17,500	17,500	17,500	17,500	17,500	17,500	17,500	309,217	25,768	309,217	88%
			14.51%	12.70%	10.42%	10.14%	4.76%	4.76%	4.76%	4.76%	4.76%	4.76%	4.76%	4.76%	86.85%	7.19%	86.85%	
<b>Law Offices of Susie Berlin</b>																		
<b>Generation</b>																		
<b>Renewables</b>																		
RES/RPS	20,000	20,000	-	-	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	16,667	1,389	16,667	
<b>Regulatory &amp; Comp</b>																		
AB32/Cap & Trade/A&G	40,000	40,000	2,145	2,652.00	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	38,130	3,178	38,130	
	60,000	60,000	2,145	2,652.00	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	54,797	4,566	54,797	91%
			3.58%	4.42%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	91.33%	7.61%	91.33%	
<b>Others</b>																		
<b>Generation - Other</b>																		
Najar & Virtue	1,000	1,000	4,997	4,452	7,374.83	23,500	5,000	83	83	83	83	83	83	83	45,907	3,826	45,907	Richard Virtue
	1,000	1,000	4,997	4,452	7,374.83	23,500	5,000	83	83	83	83	83	83	83	45,907	3,826	45,907	
			499.72%	445.2%	737.48%	2350%	500%	83%	83%	83%	83%	83%	83%	83%	4590.7%	382.6%	4590.7%	
<b>Sub Total</b>	411,000	411,000	57,940	51,523	49,875	65,000	27,500	22,583	22,583	22,583	22,583	22,583	22,583	22,583	409,921	34,160	409,921	100%
			14.10%	12.55%	12.14%	15.82%	6.70%	5.50%	5.50%	5.50%	5.50%	5.50%	5.50%	5.50%	99.74%	8.29%	99.74%	
<b>General Counsel</b>																		
<b>Porter Simon</b>																		
<b>M-S-R PPA</b>																		
<b>Generation</b>																		
Renewables	25,000	25,000	2,068	2,068	1,584.00	2,083	2,083	2,083	2,083	2,083	2,083	2,083	2,083	2,083	24,470	2,039	24,470	
<b>Regulatory &amp; Comp</b>																		
A&G	2,000	2,000	-	220	-	167	167	167	167	167	167	167	167	167	1,720	143	1,720	
	1,000	1,000	-	-	-	83	83	83	83	83	83	83	83	83	750	63	750	
	20,000	20,000	440	1,034	264.00	1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,200	12,538	1,045	12,538	
	48,000	48,000	2,508	3,322	1,848.00	3,533	3,533.33	3,533	3,533.33	3,533	3,533	3,533	3,533.33	3,533.33	39,478	3,290	39,478	82%
			5.23%	6.92%	3.77%	9.83%	9.83%	9.83%	9.83%	9.83%	9.83%	9.83%	9.83%	9.83%	82.25%	6.77%	82.25%	
<b>Consulting</b>																		
<b>KBT</b>																		
<b>Generation</b>																		
General	35,000	35,000	3,604.00	3,604.00	3,392.00	2,917	2,917	2,917	2,917	2,917	2,917	2,917	2,917	2,917	36,850	3,071	36,850	
<b>Gen - Other</b>																		
SJGS Disposition			1,092.00	-	-	-	-	-	-	-	-	-	-	-	1,092	91	1,092	
<b>Renewables</b>																		
General	40,000	40,000	3,180.00	2,332.00	2,756.00	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	38,268	3,189	38,268	
<b>Rens - Other</b>																		
BP-22 Rate Case	70,000	70,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BP-22 Rate Case
KBT 2021-01			21,840	12,376.00	6,552.00	-	-	-	-	-	-	-	-	-	18,928	9,464	18,928	Jan - Feb
KBT 2021-02			14,560	-	-	-	-	-	-	-	-	-	-	-	8,927	4,464	8,927	Mar - Apr
KBT 2021-0x			-	-	3,094.00	5,833	5,833	5,833	5,833	5,833	5,833	5,833	5,833	5,833	11,667	5,833	11,667	May - Jun
KBT 2021-0x			-	-	-	-	-	-	5,833	5,833	-	-	-	11,667	5,833	11,667	Jul - Aug	
KBT 2021-0x			-	-	-	-	-	-	-	-	5,833	5,833	-	11,667	5,833	11,667	Sep - Oct	
KBT 2021-0x			-	-	-	-	-	-	-	-	-	5,833	5,833	11,667	5,833	11,667	Nov - Dec	
Sum		36,400												74,522	74,522			
<b>Regulatory &amp; Comp</b>																		
Administrative	15,000	15,000	424.00	424.00	212.00	1,250	1,250	1,250	1,250	1,250	1,250	1,250	1,250	1,250	12,310	1,026	12,310	
	160,000	160,000	36,400	20,676.00	12,912.00	9,454.00	13,333	13,333	13,333	13,333	13,333	13,333	13,333.33	13,333.33	163,042	44,638	163,042	
			22.75%	12.90%	7.75%	8.00%	8.00%	8.00%	8.00%	8.00%	8.00%	8.00%	8.00%	8.00%	101.90%	27.65%	101.90%	
<b>Others</b>																		
<b>Administrative</b>																		
Navigant/Guidehou	3,000	3,000	-	-	-	250	250	250	250	250	250	250	250	250	2,250	188	2,250	Meetings
	3,000	3,000	-	-	-	250	250	250	250	250	250	250	250	250	2,250	188	2,250	
			0.00%	0.00%	0.00%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	75.00%	6.27%	75.00%	
<b>Sub Total</b>	163,000	163,000	20,676	12,912	9,454	13,583	13,583	13,583	13,583	13,583	13,583	13,583	13,583	13,583	165,292	44,825	165,292	
			12.68%	7.92%	5.79%	8.20%	8.20%	8.20%	8.20%	8.20%	8.20%	8.20%	8.20%	8.20%	101.41%	27.43%	101.41%	
<b>GRAND TOTAL</b>	622,000	622,000	81,124	67,757	61,177	82,117	44,617	39,700	39,700	39,700	39,700	39,700	39,700	39,700	614,691	82,275	614,691	
			13.04%	10.91%	9.83%	13.36%	7.18%	6.38%	6.38%	6.38%	6.38%	6.38%	6.38%	6.38%	98.22%	13.23%	98.22%	

# Legacy Liability - Total

Month of: Mar-2021



CURRENT MONTH					YEAR TO DATE				
By Function	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %	By Function	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
PNM - Reclamation	3,333	<b>6,198</b>	<b>(2,865)</b>	186%	PNM - Reclamation	10,000	5,180	4,820	52%
WSJM - Reclamation	128,336	128,336	0	100%	WSJM - Reclamation	326,897	320,161	6,736	98%
PNM - Decommission	4,000	<b>408</b>	3,592	10%	PNM - Decommission	12,000	36,587	<b>(24,587)</b>	305%
<b>Total</b>	<b>135,669</b>	<b>134,942</b>	<b>727</b>	<b>99%</b>	<b>Total</b>	<b>348,897</b>	<b>361,929</b>	<b>(13,031)</b>	<b>104%</b>

# PNM - Reclamation

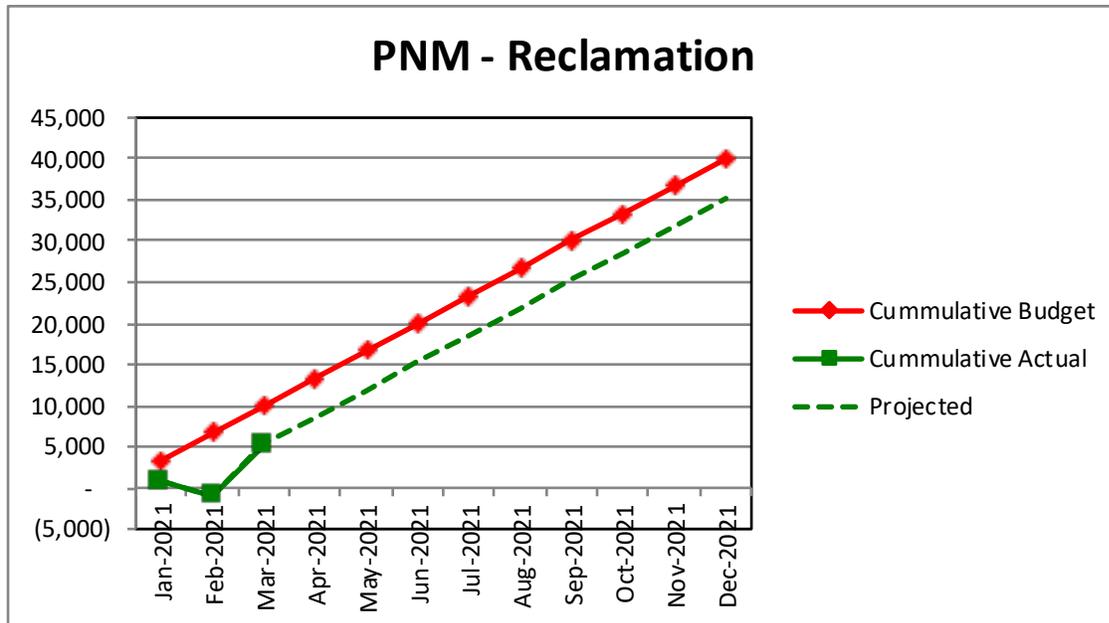
Month of: **Mar-2021**

## CURRENT MONTH

	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	3,333	6,198	<span style="color: red;">(2,865)</span>	186%
<b>Total</b>	<b>3,333</b>	<b>6,198</b>	<span style="color: red;"><b>(2,865)</b></span>	<b>186%</b>

## YEAR TO DATE

	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	10,000	<b>5,180</b>	4,820	52%
<b>Total</b>	<b>10,000</b>	<b>5,180</b>	4,820	52%



# WSJM - Reclamation

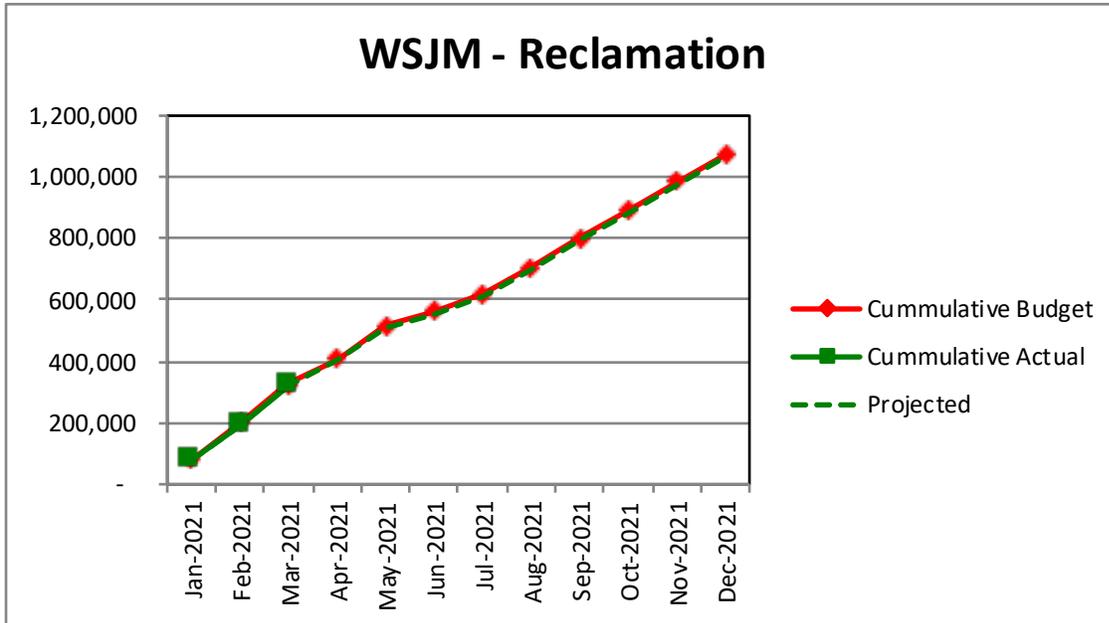
Month of: **Mar-2021**

## CURRENT MONTH

	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	128,336	128,336	0	100%
<b>Total</b>	<b>128,336</b>	<b>128,336</b>	<b>0</b>	<b>100%</b>

## YEAR TO DATE

	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	326,897	320,161	6,736	98%
<b>Total</b>	<b>326,897</b>	<b>320,161</b>	<b>6,736</b>	<b>98%</b>



# PNM - Decommissioning

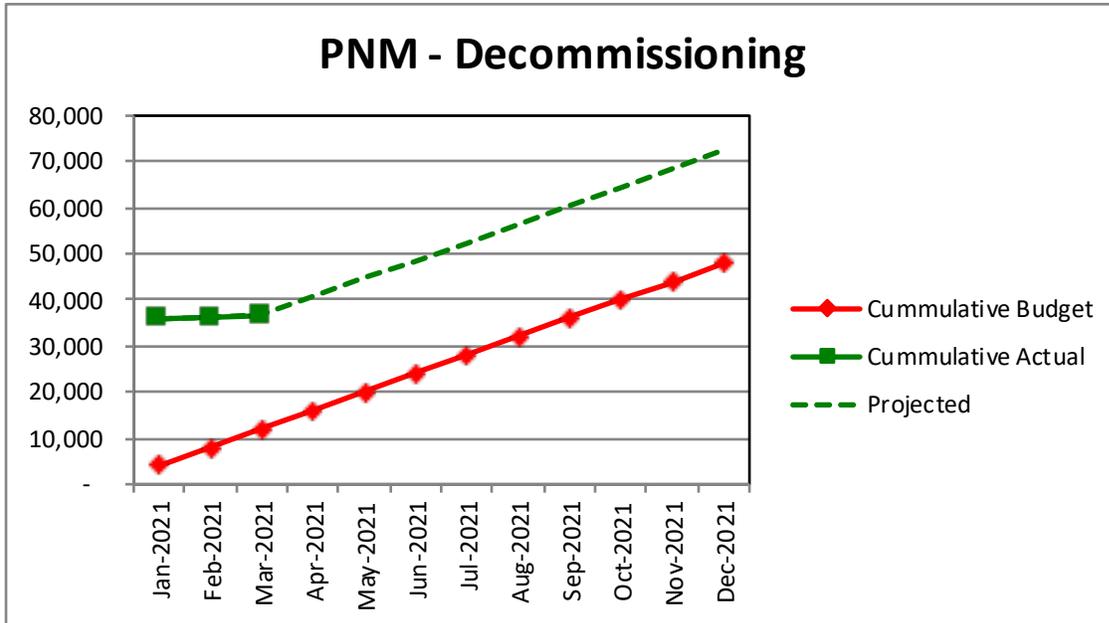
Month of: **Mar-2021**

## CURRENT MONTH

	Budget Current Month	Actual Current Month	Positive Variance	Actual v. Budget %
Generation	4,000	408	3,592	10%
<b>Total</b>	<b>4,000</b>	<b>408</b>	<b>3,592</b>	<b>10%</b>

## YEAR TO DATE

	Budget Year to Date	Actual Year to Date	Positive Variance	Actual v. Budget %
Generation	12,000	36,587	(24,587)	305%
<b>Total</b>	<b>12,000</b>	<b>36,587</b>	<b>(24,587)</b>	<b>305%</b>



Legacy Liability Costs - 2021	M-S-R 2021 Budget	Revised or A.O.P	Jan-2021 8.33%	Feb-2021 16.67%	Mar-2021 25.00%	Apr-2021 33.33%	May-2021 41.67%	Jun-2021 50.00%	Jul-2021 58.33%	Aug-2021 66.67%	Sep-2021 75.00%	Oct-2021 83.33%	Nov-2021 91.67%	Dec-2021 100.00%	Total	Average	Year-End Projection
<b>PNM - Reclamation - Budget</b>	40,000	40,000	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	3,333	40,000		
<b>Cummulative Budget</b>			3,333	6,667	10,000	13,333	16,667	20,000	23,333	26,667	30,000	33,333	36,667	40,000			
<b>Reclamation Trust Funds</b>																	
<b>Operating Agent</b>			673	(1,691)	6,198.05	<b>3,333</b>	35,180	2,932	35,180								
<b>Cummulative Actual</b>	40,000	40,000	673	(1,691)	6,198.05	3,333	3,333	3,333	3,333	3,333	3,333	3,333.33	3,333.33	3,333	35,180	2,932	35,180
			673	(1,018)	5,180	8,514	11,847	15,180	18,514	21,847	25,180	28,514	31,847	35,180			88%
			1.68%	-2.54%	12.95%	21.28%	29.62%	37.95%	46.28%	54.62%	62.95%	71.28%	79.62%	87.95%			
<b>WSJM - Reclamation - Budget</b>	925,000	1,072,463	78,389	120,172	128,336	82,729	104,568	47,270	57,341	85,926	94,355	90,726	94,927	87,725	1,072,463		
<b>Cummulative Budget</b>			78,389	198,561	326,897	409,626	514,193	561,463	618,804	704,731	799,085	889,811	984,738	1,072,463			
<b>San Juan - Surface</b>	925,000	1,072,463	78,389	113,437	128,335.60	<b>82,729</b>	<b>104,568</b>	<b>47,270</b>	<b>57,341</b>	<b>85,926</b>	<b>94,355</b>	<b>90,726</b>	<b>94,927</b>	<b>87,725</b>	1,065,727	88,811	1,065,727
<b>San Juan - Underground</b>			-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Cummulative Actual</b>	925,000	1,072,463	78,389	113,437	128,335.60	82,729	104,568	47,270	57,341	85,926	94,355	90,726	94,926.57	87,725	1,065,727	88,811	1,065,727
			78,389	191,826	320,161	402,890	507,458	554,728	612,069	697,995	792,350	883,076	978,002	1,065,727			99%
			7.31%	17.89%	29.85%	37.57%	47.32%	51.72%	57.07%	65.08%	73.88%	82.34%	91.19%	99.37%			
<b>PNM - Decommissioning</b>	48,000	48,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	48,000		
<b>Cummulative Budget</b>			4,000	8,000	12,000	16,000	20,000	24,000	28,000	32,000	36,000	40,000	44,000	48,000			
<b>Initial Decommissioning</b>			35,902.49	276.11	408.03	<b>4,000</b>	72,587	6,049	72,587								
<b>Cummulative Actual</b>	48,000	48,000	35,902.49	276.11	408.03	4,000	4,000	4,000.00	4,000	4,000	4,000	4,000.00	4,000.00	4,000	72,587	6,049	72,587
			35,902	36,179	36,587	40,587	44,587	48,587	52,587	56,587	60,587	64,587	68,587	72,587			151.22%
			74.80%	75.37%	76.22%	84.56%	92.89%	101.22%	109.56%	117.89%	126.22%	134.56%	142.89%	151.22%			
<b>Total Legacy Liability</b>	1,013,000	1,160,463	114,965	112,022	134,942	90,062	111,901	54,603	64,674	93,260	101,688	98,059	102,260	95,058	1,173,494	97,791	1,173,494
			114,965	226,987	361,929	451,990	563,891	618,495	683,169	776,429	878,117	976,176	1,078,436	1,173,494			101%
			9.91%	19.56%	31.19%	38.95%	48.59%	53.30%	58.87%	66.91%	75.67%	84.12%	92.93%	101.12%			
<b>Cummulative Budget</b>			85,723	213,228	348,897	438,959	550,860	605,463	670,138	763,397	865,085	963,145	1,065,404	1,160,463			
<b>Cummulative Actual</b>			114,965	226,987	361,929	451,990	563,891	618,495	683,169	776,429	878,117	976,176	1,078,436	1,173,494			

*Italics = Estimated*