BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

Applicant) _)
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PUBLIC SERVICE COMPANY OF NEW MEXICO)
RESOURCES IN 2028,)
CONVENIENCE AND NECESSITY FOR SYSTEM) Case No. 24-00271-UT
AGREEMENTS, AND CERTIFICATE OF PUBLIC)
AGREEMENT, ENERGY STORAGE)
FOR APPROVAL OF PURCHASED POWER)
COMPANY OF NEW MEXICO'S APPLICATION)
IN THE MATTER OF PUBLIC SERVICE)

DIRECT TESTIMONY

OF

THOMAS P. DUANE

November 22, 2024

NMPRC CASE NO. 24-___-UT INDEX TO THE DIRECT TESTIMONY OF THOMAS P. DUANE

WITNESS FOR <u>PUBLIC SERVICE COMPANY OF NEW MEXICO</u>

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PNM Exhibit TPD-1	Education and Professional Qualifications of Thomas Duane
PNM Exhibit TPD-2	PNM Loads and Resources Tables
PNM Exhibit TPD-3	Resource Portfolio Modeling Assumptions

AFFIDAVIT

1		I. INTRODUCTION AND PURPOSE
2	Q.	Please state your name, position, and business address.
3	A.	My name is Thomas P. Duane. I am the Director of Integrated Resource Planning
4		at Public Service Company of New Mexico ("PNM"). My business address is 2401
5		Aztec Rd. NE, Albuquerque, NM 87107.
6		
7	Q.	Please summarize your educational background and professional
8		qualifications.
9	А.	My education and professional qualifications are provided in PNM Exhibit TPD-1.
10		Prior to my current role, I served as Manager, Transmission Planning for PNM and
11		was responsible for the evaluation of the existing transmission planning functions,
12		analyzing transmission system deficiencies, and creating plans for the capital
13		expansion of the transmission system.
14		
15	Q.	Have you previously testified in regulatory proceedings?
16	A.	Yes. The cases in which I have testified are identified in PNM Exhibit TPD-1.
17		
18	Q.	Please describe the responsibilities of the Integrated Resource Planning
19		department.
20	A.	The Integrated Resource Planning department is responsible for developing PNM's
21		resource plans and the regulatory filings to support those resource plans, including the
22		triennial Integrated Resource Plan ("IRP") and associated updates. The Integrated

1		Resource Planning department is also responsible for performing resource planning
2		analysis to support resource additions and acquisitions, all of which require New Mexico
3		Public Regulation Commission ("NMPRC" or "Commission") approval such as those
4		being requested in this docket.
5		
6	Q.	What is the purpose of your testimony?
7	А.	The purpose of my testimony is to discuss and support the Phase III evaluation
8		performed by PNM and the resulting portfolio of resources that PNM is asking the
9		Commission to approve in PNM's Application as introduced in the testimony of
10		PNM witness Monroy.
11		
12	Q.	How is your testimony organized?
13	А.	First, I discuss the concept of resource adequacy and how this is viewed within
14		PNM's resource planning objectives and standards. Then, I discuss the Phase III
15		analysis PNM performed to determine the resources for which it is requesting
16		approval. I then describe how this procurement fits into PNM's overall strategy for
17		transitioning its electric supply to carbon-free resources consistent with New
18		Mexico's guiding energy policy, the Energy Transition Act ("ETA"), in a safe and
19		reliable way. Finally, I offer my recommendations as they relate to PNM's
20		Application.

21

22 Q. Are you sponsoring any exhibits as part of your testimony?

1	A.	Yes. I am sponsoring the following Exhibits:
2		• PNM Exhibit TPD-1 Education and Professional Qualifications of
3		Thomas Duane
4		• PNM Exhibit TPD-2 PNM Loads and Resources Tables
5		• PNM Exhibit TPD-3 Resource Portfolio Modeling Assumptions
6		II. PNM'S RESOURCE ADEQUACY
7	Q.	When evaluating and selecting new resources for PNM's system, what factors
8		does PNM consider?
9	A.	PNM considers several factors, including resource adequacy (reliability), cost-
10		effectiveness, public policy goals (e.g., the ETA), and impacts to the environment.
11		New procurements must be considered in the context of existing resources and how
12		the procurements can optimally meet the range of conditions and potential loss of
13		load events that can occur to ensure the system continues to have adequate
14		resources to meet planning standards.
15		
16	Q.	Briefly explain resource adequacy and why it is a necessary consideration in
17		procuring new resources.
18	A.	Resource adequacy is the ability of a bulk electric power system to serve load across
19		a broad range of weather and system operating conditions, subject to a long-run
20		reliability standard. No electric system is perfectly reliable; there is always some
21		chance that generator failures and/or extreme weather conditions that impact supply

1		and demand could compound with one another to result in loss of load. The resource
2		adequacy of a system depends on the characteristics of electricity demand-its
3		magnitude, seasonal and hourly patterns, and weather sensitivity-as well as
4		generation resources-their size, dispatchability, outage rates, and other limitations
5		on availability, such as the variable production of renewable resources. If the
6		availability of resources is adequate to meet load across a wide range of conditions
7		and limit loss of load events to a reasonable level-where "reasonable" is defined
8		by a reliability target-then a system is considered to have an adequate supply of
9		resources.
10		
11	0.	Are PNM's resource adequacy planning standards consistent with industry
	C	
12	C	best practices?
12 13	A.	best practices? Yes. PNM continues to employ industry best practices for resource adequacy by
12 13 14	A.	best practices? Yes. PNM continues to employ industry best practices for resource adequacy by utilizing the 0.1 LOLE (Loss of Load Expectation) planning standard and procuring
12 13 14 15	А.	 best practices? Yes. PNM continues to employ industry best practices for resource adequacy by utilizing the 0.1 LOLE (Loss of Load Expectation) planning standard and procuring the resources necessary to implement its identified system needs. Please see the
12 13 14 15 16	А.	best practices? Yes. PNM continues to employ industry best practices for resource adequacy by utilizing the 0.1 LOLE (Loss of Load Expectation) planning standard and procuring the resources necessary to implement its identified system needs. Please see the direct testimony of PNM witness Wintermantel for further details on how LOLE is
12 13 14 15 16 17	A.	best practices? Yes. PNM continues to employ industry best practices for resource adequacy by utilizing the 0.1 LOLE (Loss of Load Expectation) planning standard and procuring the resources necessary to implement its identified system needs. Please see the direct testimony of PNM witness Wintermantel for further details on how LOLE is applied to PNM's proposed portfolio of resources in this application.
12 13 14 15 16 17 18	A.	 best practices? Yes. PNM continues to employ industry best practices for resource adequacy by utilizing the 0.1 LOLE (Loss of Load Expectation) planning standard and procuring the resources necessary to implement its identified system needs. Please see the direct testimony of PNM witness Wintermantel for further details on how LOLE is applied to PNM's proposed portfolio of resources in this application. III. RESOURCE PORTFOLIO MODELING AND ANALYSIS
12 13 14 15 16 17 18 19	А. Q.	 best practices? Yes. PNM continues to employ industry best practices for resource adequacy by utilizing the 0.1 LOLE (Loss of Load Expectation) planning standard and procuring the resources necessary to implement its identified system needs. Please see the direct testimony of PNM witness Wintermantel for further details on how LOLE is applied to PNM's proposed portfolio of resources in this application. III. RESOURCE PORTFOLIO MODELING AND ANALYSIS Please briefly describe the resources proposed in this Application.
 12 13 14 15 16 17 18 19 20 	A. Q. A.	 best practices? Yes. PNM continues to employ industry best practices for resource adequacy by utilizing the 0.1 LOLE (Loss of Load Expectation) planning standard and procuring the resources necessary to implement its identified system needs. Please see the direct testimony of PNM witness Wintermantel for further details on how LOLE is applied to PNM's proposed portfolio of resources in this application. III. RESOURCE PORTFOLIO MODELING AND ANALYSIS Please briefly describe the resources proposed in this Application. The portfolio of resources PNM is presenting for approval in this filing will meet

1	customer demand and energy forecasted on PNM's system beginning in 2028. The
2	proposed resources consist of:
3	• The Valencia Power Plant Purchased Power Agreement ("PPA"). The PPA
4	provides capacity up to 173 MW based on the final contract. PNM's
5	resource evaluation used a capacity of 167 MW based on the received bid.
6	• The 150 MW four-hour Sun Lasso Battery Energy Storage System
7	("BESS") Energy Storage Agreement ("ESA").
8	• The 150 MW four-hour Corazon BESS ESA.
9	• A utility owned hybrid 100 MW solar / 30 MW BESS referred to as the
10	Sunbelt Project.
11	
12	

1 Q. Why is PNM proposing the resource portfolio presented in this filing?

2 A. The portfolio of resources included in PNM's Application represents the lowest 3 reasonable cost to both meet PNM's customer demand and energy needs in a safe 4 and reliable way while including the procurement of a resource in the Central 5 Consolidated School District ("CCSD") to meet public policy objectives as 6 described by PNM witness Monroy. For PNM, this means procuring resources to 7 meet the 0.1 LOLE industry standard while furthering PNM's transition towards a 8 carbon-free electric system. The 0.1 LOLE standard translates to a planning reserve 9 margin target of approximately 16%, consistent with PNM's 2023 IRP. As shown 10 in PNM Exhibit TPD-2 PNM Loads and Resources Tables, the planning reserve 11 margin is forecasted to be 0.1% in 2028 without the requested resource additions.

12

Q. What roles did the resource planning team play in evaluating potential resource portfolios in this filing?

15 A. PNM's resource planning team's primary objective was to perform detailed 16 portfolio modeling of a shortlist of RFP bids, focusing on portfolio economic and 17 reliability analysis. The outcome of this analysis is a recommendation for a 18 preferred set of resources. This is generally referred to as "Phase III" in the RFP 19 evaluation, as described by PNM witness Nagel. While this is the primary function 20 of the resource planning team, the team was also involved in reviewing the RFP 21 and request for bid updates prior to releasing to bidders, coordinating with expert 22 consultants on Phases I and II of the bid evaluation process and meeting with the

Independent Evaluator to provide information throughout the process. PNM
 witness Nagel discusses the RFP phases and processes in detail in his direct
 testimony.

4

Q. Please describe the general framework PNM used to determine the resource portfolio presented in this filing.

7 A. The first step was to issue an RFP and obtain offers for resources deliverable to 8 PNM's system by the summer of 2028. PNM issued the original RFP in November 9 of 2022 and asked for offers to be submitted for resources that could be delivered 10 in 2026, 2027, or 2028. This process included bid "refreshes" and updates in 2024 11 to adjust for changes in costs and market conditions. PNM's RFP administration 12 and evaluation team went through a three-phase process to evaluate the bids for 13 2028, which was overseen by an Independent Evaluator. The final shortlist of bids 14 resulting from the second phase of the RFP evaluation was provided to my team. 15 This shortlist of bids was used to populate a database of candidate resources in 16 PNM's resource planning tools.

17

Q. Was PNM's procurement process consistent with its most recent IRP that was accepted by the commission and supplemented on October 10, 2024?

A. Yes. The general framework for the portfolio analysis used to determine the
 resource portfolio presented in this case started with the modeling process and
 protocols utilized in PNM's 2023 IRP.

2	Q.	What modeling tools did PNM use to perform its resource portfolio analysis?
3	А.	PNM used the EnCompass software to perform its economic analysis. EnCompass
4		is a power supply optimization software developed and licensed by Yes Energy ¹
5		that uses Mixed Integer Programming to simultaneously optimize multiple
6		objectives and constraints (financial, physical, operational, reliability, etc.). PNM
7		also relied on the Strategic Energy Evaluation and Risk Model ("SERVM") under
8		a consulting agreement with Astrapé Consulting, LLC ("Astrape") for the loss of
9		load probability ("LOLP") modeling of portfolios.
10		
11	Q.	How do the EnCompass and SERVM modeling work together to produce a
12		reliable and cost-effective resource portfolio?
13	А.	PNM Figure TPD-1 graphically shows how SERVM and EnCompass are used in
14		PNM's planning process. EnCompass determines the least cost portfolios under
15		various scenarios and sensitivities which can be simulated in SERVM to validate
16		portfolio reliability standards are met. SERVM is used to perform studies to define
17		PNM's resource adequacy needs across a wide range of weather conditions and to

¹ Horizons Energy provides technical consulting services including EnCompass modeling for PNM's Resource Analysis under PNM's direction. Horizons Energy specializes in consulting services using EnCompass and works closely with Yes Energy which licenses the EnCompass software and develops the Horizons EnCompass National Database.

1

develop Effective Load Carrying Capability ("ELCC")² values that are to be used

2 in the EnCompass capacity expansion module. 3 4 **PNM Figure TPD-1** SERVM **RM & ELCCs** Planning Reserve Margin (%) T 0 Perform LOLP Analysis for ľ 0.1 LOLE and ELCCs ELCC per technology (% Firm) T Installed Capacity (MW) **Capacity Expansion** Firm Capacity (MW) Fixed Costs (\$/yr) Installed Capacity (MW) Annual Generation (GWh) Adjust Portfolio if **Production Simulation** Variable Costs (\$/yr) 2 **Reliability not** Carbon Emissions (tons/yr) met Water Use (gallons/yr) LOLP Modeling SERVM Loss of Load Expectation (days/yr) 3 Expected Unserved Energy (GWh/yr) 5 6 7 Q. Please summarize the key assumptions modeled for the phase III evaluation 8 that were updated since the IRP filing. 9 PNM used the 2023 IRP modeling assumptions as the starting point for its portfolio Α. 10 evaluation. Key inputs that were used in EnCompass and updated from the 11 December 2023 IRP filing include the following: 12 The Study Horizon, to examine the 20-year period of 2026-2045; 13 The load forecast (PNM Exhibit TPD-2);

² ELCC refers to a methodology used to measure the contribution of a specific type of generating resource towards system resource adequacy needs by comparing it against a common benchmark (often a "perfect capacity" resource available at full capacity at all times) in a loss-of-load probability model.

1		• Commodities pricing (PNM Exhibit TPD-3);
2		• Fixed production revenue requirements for the existing PNM system;
3		• ELCC assumptions for renewable, energy storage, and demand response
4		resources (PNM Exhibit TPD-3); and
5		• Generic candidate resources, technology cost curves (PNM Exhibit TPD-3),
6		and use of the explicit bids received from the 2028 RFP bid refresh (2028
7		bids only).
8		
9	Q.	How does PNM compare the relative economics between resource portfolios?
10	А.	PNM measures long-term costs by using EnCompass to compare the difference in
11		the net present value ("NPV") of revenue requirements required to meet retail
12		customer loads over a 20-year planning period. This is consistent with the
13		requirement in the Commission's IRP Rule [17.7.3.7(P) and 17.7.3.8 NMAC] to
14		consider resource portfolio costs over a 20-year planning period. PNM's
15		calculation of long-term costs and comparative savings includes the following:
16		• Cost to operate and maintain existing resources over 20 years;
17		• Cost to build, operate, and maintain any resources added in the 20-year
18		study period; and
19		• Costs associated with retirement or abandonment of any resources during
20		the 20-year study period.
21		

1		The resulting portfolios were constructed subject to the following constraints: all
2		portfolios had to meet the demand and energy loads of PNM's customers and meet
3		regulatory requirements such as New Mexico's Renewable Portfolio Standard and
4		emission rate requirements. All the costs of construction or acquisition of resources,
5		fuel/variable production costs, O&M, and other costs (including the costs for
6		known transmission network upgrades) were translated into estimated revenue
7		requirements. Portfolio costs were calculated for the 20-year study period and
8		converted to NPV to compare costs on an equivalent basis.
9		
10	Q.	What scenarios were examined in the phase III evaluation?
11	A.	PNM analyzed a multitude of scenarios that will allow PNM to reach a carbon-free
12		portfolio by 2040. Generally, scenarios were categorized into two types of
13		scenarios: 1) scenarios that were based on as-bid pricing and 2) scenarios that were
14		based on as-bid pricing including either imputed debt impacts or volumetric pricing
15		structures. Scenarios modeled with as-bid pricing were only used to determine the
16		relative costs between portfolios. Scenarios modeled with as-bid pricing and either
17		imputed debt or volumetric pricing structures were the focus of the modeling
18		analysis and from which the final portfolio selections were made.
10		
1)		

A. Yes. Sensitivity analysis focuses on modeling a change in only one assumption and
comparing the results before and after the change. PNM's sensitivity analysis in

1		this evaluation consisted of optimizations of resources related to community
2		preferences (CCSD or Navajo Nation), including or excluding specific RFP bids in
3		portfolio optimizations, not allowing selection of bids for gas resources,
4		sensitivities on incremental load, changes in future commodity costs, changes in
5		future technology costs and sensitivities on the continued operation of Reeves
6		Generating Station beyond 2030.
7		
8	Q.	How did PNM's scenario and sensitivity analysis inform the modeling results
9		and recommended portfolio?
9 10	А.	and recommended portfolio? PNM utilized the scenario and sensitivity analysis to compare resource builds and
9 10 11	A.	and recommended portfolio? PNM utilized the scenario and sensitivity analysis to compare resource builds and portfolio costs across a wide range of assumptions. This also helped to determine
9 10 11 12	А.	and recommended portfolio?PNM utilized the scenario and sensitivity analysis to compare resource builds andportfolio costs across a wide range of assumptions. This also helped to determinehow consistently each of the bid projects were included in each of the least cost
9 10 11 12 13	А.	and recommended portfolio?PNM utilized the scenario and sensitivity analysis to compare resource builds andportfolio costs across a wide range of assumptions. This also helped to determinehow consistently each of the bid projects were included in each of the least costportfolios across sensitivities. Sensitivity analysis also provided information such
9 10 11 12 13 14	А.	and recommended portfolio? PNM utilized the scenario and sensitivity analysis to compare resource builds and portfolio costs across a wide range of assumptions. This also helped to determine how consistently each of the bid projects were included in each of the least cost portfolios across sensitivities. Sensitivity analysis also provided information such as cost differences between bid projects that were not selected in least-cost
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17

18 Q. Please summarize the results of the phase III evaluation.

A. The portfolio analysis identified the mix of resources comprised of four projects to
 meet system requirements as identified earlier in this testimony. The portfolio
 meets the 0.1 LOLE resource adequacy standard and achieves a planning reserve
 margin of 17.7% percent in 2028 and 16.1% in 2029. This slightly exceeds the

1		minimum targeted reserve margin in 2028 as a result of the specific bids comprising
2		the selected portfolio but achieves the targeted reserve margin by 2029. PNM
3		witness Barnard provides additional details about these projects, including the
4		proposed contractual agreements for these resources.
5		
6	Q.	Please briefly describe the analysis performed by Astrape.
7	А.	Astrape performs consulting services and analysis on PNM's behalf using the
8		SERVM model. Similar to its role in Case No. 23-00353-UT, Astrape utilized the
9		results of PNM's EnCompass economic modeling and performed LOLP analyses
10		of PNM's recommended portfolio. The LOLP results performed for the portfolio
11		presented in this case showed that the portfolio is adequate and deemed a reliable
12		portfolio. SERVM and its applications in this proceeding are more fully described
13		by PNM witness Wintermantel.
14		
15	Q.	Are there other factors considered in PNM's modeling?
16	А.	Yes. PNM also considered the financial impacts of ESA's being treated like lease
17		agreements. As previously described, PNM received a short-list of RFP projects to
18		be evaluated in its portfolio system modeling to determine the best performing mix
19		of existing and new resources. For energy storage agreements, additional costs were
20		calculated for these projects to reflect the potential to be treated like a lease liability
21		that would appear on PNM's balance sheet. The lease liability creates a cost
22		referred to as imputed debt in this testimony. PNM assumed the same methodology

1		utilized in Case No. 23-00353-UT to determine the incremental cost of equity that
2		would be needed to offset the imputed debt resulting from fixed price ESAs. PNM
3		assumed that approximately 25% of each ESA's lease liability should be
4		categorized as non-lease components and a 75% risk factor adjustment from the
5		applicable rating agencies. For RFP projects that were bid a corresponding
6		volumetric pricing structure, life-cycle costs of both pricing structures were
7		calculated, and the lowest cost pricing structure was used in the Phase III
8		evaluation.
9		
10	Q.	Are there differences in the terms of the final contracts for the two 150 MW
11		BESS ESAs that mitigate the imputed debt impact assumed in the phase III
12		evaluation?
13	A.	Yes. The final contracts incorporated an "availability" pricing structure that was
14		acceptable to the bidders and eliminates the imputed debt risk. The monthly
15		payment in these contracts is now a function of availability in that month. Witness
16		Barnard discusses terms of the agreements. With the availability pricing, the total
17		20-year NPV will be reduced, lowering the overall cost of the selected resource
18		portfolio compared to what was modeled in the evaluation process.
19		
20	~	Disease diseases DNM/s analysis associated with a project leasted in the CCSD
20	Q.	Please discuss PNWT's analysis associated with a project located in the CCSD

1	А.	As a part of its 2026-2028 RFP, PNM committed to progressing some projects
2		located within the CCSD or sited on Navajo Nation tribal lands into the Phase III
3		evaluation to determine whether an overall portfolio with a CCSD or Navajo project
4		was reasonably competitive relative to the least-cost portfolio that considers all
5		shortlist options. Both CCSD and Navajo projects were evaluated, and the Sunbelt
6		project was identified as producing a portfolio at a minimal cost increase above the
7		least-cost portfolio by approximately \$39M NPV. A similar sized portfolio that
8		included a Navajo Nation project was determined to be a hybrid 100 MW solar and
9		50 MW BESS project that resulted in a portfolio cost increase above the least-cost
10		portfolio by approximately \$46M NPV.
11		
12	Q.	Will PNM's resource portfolio meet resource adequacy requirements with a
13		combination of the Valencia PPA, energy storage and solar energy?
14	А.	Yes. The resource portfolio presented in this Application achieves the industry
15		planning standard of 0.1 LOLE criteria. PNM witness Wintermantel's testimony
16		provides additional detail regarding the resource adequacy modeling showing how
17		the selected resource portfolio meets the 0.1 LOLE resource adequacy standard.
18		

1		IV. CONSISTENCY WITH SAFE AND RELIABLE TRANSITION TO
2		CARBON-FREE RESOURCES AND PNM'S IRP
3	Q.	Has PNM shown that its proposed portfolio of resources, including the PPA
4		and ESAs, is consistent with the provision of safe and reliable electric utility
5		service at the lowest reasonable cost, considering both short- and long-term
6		costs and all other relevant factors like the ETA, as required by Rule
7		551.8(D)(6)?
8	А.	Yes, as supported through my testimony, PNM's recommended portfolio of
9		resources in this application will allow PNM to continue to deliver reliable electric
10		service to its customer, as demonstrated through the industry standard LOLE
11		criteria. Also as described in my testimony, PNM's analysis of bids received in its
12		all-resource RFP has resulted in the lowest reasonable cost resources to meet this
13		need while also including a resource in the CCSD. Refer to the testimony of PNM
14		witness Nagel for further detail on the bid analysis process.
15		
16	Q.	How does the portfolio support PNM's efforts to transition to a carbon-free
17		generation portfolio?
18	А.	The portfolio of resources included in this Application aligns with a move to a fully
19		carbon-free generation fleet by 2045 as required by the ETA, and PNM's
20		complementary sustainability goal to be carbon-free by 2040. Renewable energy
21		generation in PNM's resource portfolio are sourced mainly from low-cost wind and
22		solar resources. The timeframes in which this energy is produced is limited and

1		varies throughout the year. While it is possible to produce substantial carbon free
2		energy from these technologies, it is increasingly important that the energy be
3		stored and used during times when wind and solar output are not sufficient to serve
4		load. As with the resource additions approved in Case No. 23-00353-UT, PNM's
5		analysis continues to show that additional storage is required to minimize the cost
6		of balancing capacity deficiencies in low wind and solar timeframes with the low
7		cost of energy from these resources. PNM's recommended portfolio, therefore,
8		mainly consists of additional BESS to store renewable energy and return the energy
9		at times when capacity is needed to serve load, typically during low wind and solar
10		generation periods.
11		
11 12	Q.	Were long-duration storage resources analyzed in PNM's Phase III
11 12 13	Q.	Were long-duration storage resources analyzed in PNM's Phase III evaluation?
 11 12 13 14 	Q. A.	Were long-duration storage resources analyzed in PNM's Phase III evaluation? Storage options submitted to PNM in the RFP process were limited to 2 and 4-hour
 11 12 13 14 15 	Q. A.	Were long-duration storage resources analyzed in PNM's Phase III evaluation? Storage options submitted to PNM in the RFP process were limited to 2 and 4-hour BESS. As a result, there were no bids to evaluate or available to consider in the
 11 12 13 14 15 16 	Q. A.	Were long-duration storage resources analyzed in PNM's Phase III evaluation? Storage options submitted to PNM in the RFP process were limited to 2 and 4-hour BESS. As a result, there were no bids to evaluate or available to consider in the Phase III evaluation. The All-source RFP issued in conjunction with this resource
 11 12 13 14 15 16 17 	Q.	Were long-duration storage resources analyzed in PNM's Phase III evaluation? Storage options submitted to PNM in the RFP process were limited to 2 and 4-hour BESS. As a result, there were no bids to evaluate or available to consider in the Phase III evaluation. The All-source RFP issued in conjunction with this resource evaluation allowed bidders to quote energy storage durations at their discretion. In
 11 12 13 14 15 16 17 18 	Q.	Were long-duration storage resources analyzed in PNM's Phase III evaluation? Storage options submitted to PNM in the RFP process were limited to 2 and 4-hour BESS. As a result, there were no bids to evaluate or available to consider in the Phase III evaluation. The All-source RFP issued in conjunction with this resource evaluation allowed bidders to quote energy storage durations at their discretion. In its next resource RFP, PNM plans to specify a need for firm generating resources
 11 12 13 14 15 16 17 18 19 	Q.	Were long-duration storage resources analyzed in PNM's Phase III evaluation? Storage options submitted to PNM in the RFP process were limited to 2 and 4-hour BESS. As a result, there were no bids to evaluate or available to consider in the Phase III evaluation. The All-source RFP issued in conjunction with this resource evaluation allowed bidders to quote energy storage durations at their discretion. In its next resource RFP, PNM plans to specify a need for firm generating resources that include emerging technologies such as long-duration storage to help meet its
 11 12 13 14 15 16 17 18 19 20 	Q.	Were long-duration storage resources analyzed in PNM's Phase III evaluation? Storage options submitted to PNM in the RFP process were limited to 2 and 4-hour BESS. As a result, there were no bids to evaluate or available to consider in the Phase III evaluation. The All-source RFP issued in conjunction with this resource evaluation allowed bidders to quote energy storage durations at their discretion. In its next resource RFP, PNM plans to specify a need for firm generating resources that include emerging technologies such as long-duration storage to help meet its future needs.

Q. How does the Valencia PPA for a natural gas-fired resource fit within the ETA transition to clean energy?

3 A. The Valencia PPA is also consistent with our transition to a carbon-free portfolio 4 by helping to maintain reliability as we continue to increase the amount of 5 intermittent renewable energy used to serve our customers. The continued operation of the existing gas-fired facility through the Valencia PPA is a cost-6 7 effective means of sustaining overall reliability. Continued operation provides time 8 for longer-duration capacity resources to be developed over what is currently 9 available in the market today. The operation of the Valencia CT will mostly be to 10 insure reliability. The total generation is expected to be low and, as a result, have 11 minimal contributions to CO2 emissions. PNM also believes there may be longer-12 term prospects for CT technologies to run on carbon free fuels.

13

14 Q. Please explain how the requested Sunbelt Project fulfills the intent of the ETA.

A. The inclusion of the Sunbelt project adds additional carbon-free solar energy to PNM's portfolio along with additional battery storage needed to shift energy and capacity needs to times in the day when resources are most needed. The project also represents the least cost option for adding new resources in the Central Consolidated School District ("CCSD") as soon as is practicable to help offset the impact of shutting down traditional coal-fired generation that historically provided significant economic benefits to these communities.

1	Q.	Is PNM's application in this filing consistent with the 2023-2042 IRP, as
2		required by Rule 551.8(D)(8)?
3	А.	Yes, the analysis and conclusions are consistent with PNM's 2023 IRP in the
4		following ways:
5		• PNM's proposed portfolio of resources consists of a mix of renewable
6		generation, thermal generation, and battery storage resources which are
7		consistent with the revised statement of need in the IRP Supplemental Filing
8		made October 10, 2024.
9		• The proposed resources align with PNM's multiple-path 2023 IRP by investing
10		in renewables and non-carbon emitting resources that support PNM's
11		compliance with the ETA.
12		
13	Q.	Please summarize your recommendation for this resource application.
14	А.	I recommend that the Commission approve PNM's Application requesting
15		approval for a portfolio consisting of: The Valencia PPA, the 150 MW four-hour
16		Sun Lasso BESS ESA, the 150 MW four-hour Corazon BESS ESA, and the utility
17		owned hybrid 100 MW solar / 30 MW BESS Sunbelt Project. PNM also has
18		provided an option for an additional 20 MW BESS for the Sunbelt Project as
19		discussed by PNM witness Monroy.
20		
21	Q.	Does this conclude your testimony?
	А.	Yes, it does.

Education and Professional Qualifications of Thomas Duane

PNM Exhibit TPD-1

Is contained in the following 2 pages.

PNM EXHIBIT TPD-1

Name: Thomas P. Duane

Address: Public Service Company of New Mexico 414 Silver Ave SW Albuquergue, New Mexico 87102

- Position: Manager, Transmission Planning
- **Education:** Bachelor of Science in Electrical Engineering, University of Colorado, Boulder, Colorado 1980

Master of Science in Electrical Engineering, Electric Utility Management Program, New Mexico State University, Las Cruces, New Mexico 1998

- Employment: Public Service Company of New Mexico, Albuquerque, New Mexico
 - Director, Integrated Resource Planning 2024
 - Transmission Planning Engineer, Manager Transmission Planning (12 Years) 1984-1996, 2006-2024
 - Manager, Production Modeling 1996-2005
 - Operations Engineer, Wholesale Power Marketing Analyst 1981-1984, 2005

Licensure: Licensed Professional Engineer in the State of New Mexico

Professional Affiliations: Member of Institute of Electrical and Electronic Engineers ("IEEE") Power Engineering Society and Computer Society

Experience:

- Power System Analysis, Planning and Operations Steady State, Dynamic Stability, Transient, Short Circuit, Power Operations, Production Costs, Generation Dispatch, Resource Planning
- Committee Representation over 25 years in inter-utility coordination groups, WECC and ERCOT reliability committees, RTO Tariff negotiations, stakeholder groups and industry organizations.

Previous Testimony:

New Mexico Public Regulation Commission (2023): Provided testimony on behalf of Public Service Company of New Mexico regarding transmission system impacts associated with the 2026 resource application. Case No. 23-00353-UT.

New Mexico Public Regulation Commission (2023): Provided testimony on behalf of Public Service Company of New Mexico regarding transmission system impacts associated with TAG solar facility interconnection. Case No Case No. 23-00251-UT.

New Mexico Public Regulation Commission (2021): Provided testimony on behalf of Public Service Company of New Mexico regarding transmission system impacts associated with replacement resources for 114 MW of Palo Verde Nuclear generation. Case No Case No. 21-00215-UT.

New Mexico Public Regulation Commission (2020): Provided rebuttal testimony on behalf of Public Service Company of New Mexico regarding transmission system impacts

associated with replacement resources for San Juan Generation Station Units 1 and 4. Case No 19-00195-UT.

County of Torrance, Seventh Judicial District Court (2020) – Application for Order of Immediate Possession, State of New Mexico, Case D-722-CV-2020-00083, Provided affidavit regarding the need for immediate possession of right-of-way to maintain an existing transmission line.

Federal Energy Regulatory Commission (2010): Provide affidavit on the PNM Balancing Authority Area System Import Limit (SIL) calculations used in the Triennial Market Power Update. Docket Nos. ER96-1551, ER01-615 and ER09-746.

GCG#533199

PNM Loads and Resources Tables

PNM Exhibit TPD-2

Is contained in the following 4 pages.

PNM System Loads and Resour	rces - 2028 R	lesource A	Applicati	on - Exis	ting & A	pproved	Resource	es
	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP
Description	2026	2027	2028	2029	2030	2031	2032	2033
Forecasted System Peak Demand	2,387	2,441	2,466	2,514	2,550	2,586	2,625	2,669
Forecasted Incremental Energy Efficiency	(63)	(75)	(80)	(88)	(98)	(109)	(118)	(124)
Forecasted Incremental Customer Sited PV	(37)	(52)	(35)	(43)	(52)	(60)	(68)	(76)
Net System Peak Demand (MW)	2,286	2,314	2,351	2,383	2,401	2,418	2,439	2,468
San Juan								
Four Corners	160	160	160	160	160	160	0	0
Total Coal Resources (MW)	160	160	160	160	160	160	0	0
Palo Verde Units 1,2 & 3	282	282	282	282	282	282	282	282
Total Nuclear Resources (MW)	282	282	282	282	282	282	282	282
Reeves	141	141	141	141	141	0	0	0
Afton	230	230	230	230	230	230	230	230
Lordsburg	84	84	84	84	84	84	84	84
Luna	184	184	184	184	184	184	184	184
Rio Bravo	141	141	141	141	141	141	141	141
Valencia	150	150	0	0	0	0	0	0
LaLuz	37	37	37	37	37	37	37	37
Total Natural Gas Resources (MW)	968	968	818	818	818	677	677	677
Total Demand Response Programs (MW)	23	23	23	23	0	0	0	0
			-	-				
Wind Purchase (La Joya II)	28	28	28	28	28	28	28	28
Wind Purchase (NMWEC + Repower)	40	40	40	40	40	40	40	40
Wind Purchase (Red Mesa)	21	21	21	21	21	21	21	21
Utility-Scale Solar PV (22MW - 2012 REPP)	1	1	1	1	1	1	1	1
Utility-Scale Solar PV (21.5MW - 2013 REPP)	1	1	1	1	1	1	1	1
Utility-Scale Solar PV (23MW - 2014 REPP)	1	1	1	1	1	1	1	1
Utility-Scale Solar PV (40MW - 2015 REPP)	2	2	2	2	2	2	2	2
Utility-Scale Solar PV (50MW - 2018 REPP)	3	3	3	3	3	3	3	3
Arroyo Solar	17	17	17	17	17	17	17	17
Jicarilla 2 - Solar Direct Program	3	3	3	3	3	3	3	3
Jicarilla 1 Solar	3	3	3	3	3	3	3	3
San Juan Solar ³	11	11	11	11	11	11	11	11
Atrisco Solar ⁴	18	18	18	18	18	18	18	18
Dale Burgett Geothermal Plant	5	5	5	5	5	5	5	5
Community Solar I	7	7	7	7	7	7	7	7
Facebook Solar Energy Center 1, 2, & 3	2	2	2	2	2	2	2	2
Britton Solar PV	3	3	3	3	3	3	3	3
Encino Solar PV	3	3	3	3	3	3	3	3
Encino North PV	3	3	3	3	3	3	3	3
Route 66 Solar PV	3	3	3	3	3	3	3	3
Sky Ranch Solar PV	11	11	11	11	11	11	11	11
Casa Mesa Wind	10	10	10	10	10	10	10	10
La Joya I Wind	33	33	33	33	33	33	33	33
TAG Solar PV	8	8	8	8	8	8	8	8
Ouail Ranch Solar PV	6	6	6	6	6	6	6	6
Total Renewable Resources (MW)	245	245	245	245	245	245	245	245
Arrovo Storage	126	126	126	126	126	126	126	126
Ticarilla 1 Storage	120	120	120	120	120	120	120	120
San Juan Storage	1/	1/ Q/	1 / Q/	1 / Q/	1/ Q/	1 / Q/	1/ Q/	1/ Q/
Atrisco Storage	04	04 252	04 252	04 252	0 4 252	04 252	0 4 252	04 252
Sky Ranch Storage	233 19	255 47	255 A7	255 47	255 47	255 47	255 47	255 12
TAG Storage	42	42	42	42	42	42	42	42

PNM System Loads and Resource	es - 2028 R	esource A	Applicati	on - Exist	ting & A	pproved	Resource	es
	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP
Description	2026	2027	2028	2029	2030	2031	2032	2033
Quail Ranch Energy Storage	84	84	84	84	84	84	84	84
Sky Ranch Energy Storage	84	84	84	84	84	84	84	84
Route 66 Energy Stroage	42	42	42	42	42	42	42	42
Sandia Energy Storage	51	51	51	51	51	51	51	51
Total Storage Resources (MW)	826	826	826	826	826	826	826	826
Total Resources (MW) ²	2,504	2,504	2,354	2,354	2,331	2,190	2,030	2,030
Reserve Margin (MW)	217	190	3	(29)	(69)	(228)	(410)	(439)
Reserve Margin (%)	9.5%	8.2%	0.1%	-1.2%	-2.9%	-9.4%	-16.8%	-17.8%

Notes

1. Resource projections for thermal resources are based on unforced capacity (UCAP) and effective load carrying capability (ELCC) for renewable resources and energy limited resources. This table does not reflect the namplate capacity for resources.

PNM System Loads and	Resources -	2028 Res	ource Ap	plication	- Prefer	red Portf	olio	
	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP
Description	2026	2027	2028	2029	2030	2031	2032	2033
Forecasted System Peak Demand	2,387	2,441	2,466	2,514	2,550	2,586	2,625	2,669
Forecasted Incremental Energy Efficiency	(63)	(75)	(80)	(88)	(98)	(109)	(118)	(124)
Forecasted Incremental Customer Sited PV	(37)	(52)	(35)	(43)	(52)	(60)	(68)	(76)
Net System Peak Demand (MW)	2,286	2,314	2,351	2,383	2,401	2,418	2,439	2,468
San Juan								
Four Corners	160	160	160	160	160	160	0	0
Total Coal Resources (MW)	160	160	160	160	160	160	0	0
	100	100	100	100	100	100	Ũ	Ũ
Palo Verde Units 1,2 & 3	282	282	282	282	282	282	282	282
Total Nuclear Resources (MW)	282	282	282	282	282	282	282	282
Deetver	141	141	141	141	141	0	0	0
Aften	220	220	220	220	220	220	220	220
Alton	230	230	230	230	230	230	230	230
Luna	04 194	184	194	194	194	194	194	194
Luna Dia Dravia	164	164	1 64	104	104	104	1 64	164
KIO Bravo	141	141	141	141	141	141	141	141
	150	150	161	161	161	161	161	161
Total Natural Gas Resources (MW)	968	968	979	979	979	838	838	838
Total Demand Response Programs (MW)	23	23	23	23	0	0	0	0
Wind Purchase (La Jova II)	28	28	28	28	28	28	28	28
Wind Purchase (NMWEC + Repower)	40	40	40	40	40	40	40	40
Wind Purchase (Red Mesa)	21	21	21	21	21	21	21	21
Utility-Scale Solar PV (22MW - 2012 REPP)					1			
Utility-Scale Solar PV (21.5MW - 2013 REPP)	1	1	1	1	1	1	1	1
Utility-Scale Solar PV (23MW - 2014 REPP)	1	1	1	1	1	1	1	1
Utility-Scale Solar PV (20MW - 2015 REPP)	2	2	2	2	2	2	2	2
Utility-Scale Solar PV (50MW - 2018 REPP)	3	3	2	2	2	2	2	2
Arrovo Solar	17	17	17	17	17	17	17	17
Jicarilla 2 Solar Direct Program	17	2	2	2	17	17	2	17
Jicarilla 1 Solar	3	3	2	2	3	2	2	3
Sen Isen Seler ³	3	3	3	3	3	3	3	3
San Juan Solar	11	11	11	11	11	11	11	11
Atrisco Solar	18	18	18	18	18	18	18	18
Dale Burgett Geothermal Plant	5	5	5	5	5	5	5	5
Community Solar I	7	7	7	7	7	7	7	7
Facebook Solar Energy Center 1, 2, & 3	2	2	2	2	2	2	2	2
Britton Solar PV	3	3	3	3	3	3	3	3
Encino Solar PV	3	3	3	3	3	3	3	3
Encino North PV	3	3	3	3	3	3	3	3
Route 66 Solar PV	3	3	3	3	3	3	3	3
Sky Ranch Solar PV	11	11	11	11	11	11	11	11
Casa Mesa Wind	10	10	10	10	10	10	10	10
La Joya I Wind	33	33	33	33	33	33	33	33
TAG Solar PV	8	8	8	8	8	8	8	8
Quail Ranch Solar PV	6	6	6	6	6	6	6	6
Sunbelt Solar PV	0	0	6	6	6	6	6	6
Total Renewable Resources (MW)	245	245	249	249	249	249	249	249
Arrovo Storage	126	126	123	123	123	123	123	123
Jicarilla 1 Storage	120	120	16	16	16	16	16	125
San Juan Storage	84	84	82	82	82	82	82	82
Atrisco Storage	253	253	246	246	246	246	246	246
Sky Ranch Storage	42	42	41	41	41	41	41	41

PNM System Loads an	nd Resources - 2	2028 Res	ource Ap	plication	- Prefer	red Portf	olio	
	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP	UCAP
Description	2026	2027	2028	2029	2030	2031	2032	2033
TAG Storage	42	42	41	41	41	41	41	41
Quail Ranch Energy Storage	84	84	82	82	82	82	82	82
Sky Ranch Energy Storage	84	84	82	82	82	82	82	82
Route 66 Energy Stroage	42	42	41	41	41	41	41	41
Sandia Energy Storage	51	51	49	49	49	49	49	49
Central Energy Storage	0	0	123	123	123	123	123	123
Corazon Energy Storage	0	0	123	123	123	123	123	123
Sunbelt Energy Storage	0	0	25	25	25	25	25	25
Total Storage Resources (MW)	826	826	1,073	1,073	1,073	1,073	1,073	1,073
Total Resources (MW) ²	2,504	2,504	2,766	2,766	2,743	2,602	2,442	2,442
Reserve Margin (MW)	217	190	415	383	343	184	2	(27)
Reserve Margin (%)	9.5%	8.2%	17.7%	16.1%	14.3%	7.6%	0.1%	-1.1%

Notes

1. Resource projections for thermal resources are based on unforced capacity (UCAP) and effective load carrying capability (ELCC) for renewable resources and energy limited resources. This table does not reflect the namplate capacity for resources.

Resource Portfolio Modeling Assumptions

PNM Exhibit TPD-3

Is contained in the following 4 pages.











								E	BESS 4-	hr (% E	LCC)										
Load Level																					
(MW)	Existing	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
0	84.8	84.8	84.8	84.8	84.8	84.8	84.8	63.7	63.7	63.7	63.7	63.7	63.7	63.7	63.7	52.7	52.7	52.7	52.7	52.7	52.7
850		80.7	80.7	80.7	80.7	80.7	80.7	63.7	63.7	63.7	63.7	63.7	63.7	63.7	63.7	52.7	52.7	52.7	52.7	52.7	52.7
1050		75.8	75.8	75.8	75.8	75.8	75.8	63.7	63.7	63.7	63.7	63.7	63.7	63.7	63.7	52.7	52.7	52.7	52.7	52.7	52.7
1250		65.0	65.0	65.0	65.0	65.0	65.0	63.7	63.7	63.7	63.7	63.7	63.7	63.7	63.7	52.7	52.7	52.7	52.7	52.7	52.7
1450		44.7	44.7	44.7	44.7	44.7	44.7	61.8	61.8	61.8	61.8	61.8	61.8	61.8	61.8	52.7	52.7	52.7	52.7	52.7	52.7
1650		27.7	27.7	27.7	27.7	27.7	27.7	49.7	49.7	49.7	49.7	49.7	49.7	49.7	49.7	52.7	52.7	52.7	52.7	52.7	52.7
1850		25.4	25.4	25.4	25.4	25.4	25.4	40.3	40.3	40.3	40.3	40.3	40.3	40.3	40.3	52.7	52.7	52.7	52.7	52.7	52.7
2000		23.7	23.7	23.7	23.7	23.7	23.7	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	36.1	36.1	36.1	36.1	36.1	36.1
2500		10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
9999		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
									Solar	(% ELC	:C)										

									50101	(/0 LLC	.0)										
LOad Level																					
(MW)	Existing	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
0	6.0	6.0	6.0	6.0	6.0	6.0	6.0	18.5	18.5	18.5	18.5	18.5	18.5	18.5	18.5	24.0	24.0	24.0	24.0	24.0	24.0
300		6.0	6.0	6.0	6.0	6.0	6.0	18.5	18.5	18.5	18.5	18.5	18.5	18.5	18.5	24.0	24.0	24.0	24.0	24.0	24.0
1000		6.0	6.0	6.0	6.0	6.0	6.0	18.5	18.5	18.5	18.5	18.5	18.5	18.5	18.5	24.0	24.0	24.0	24.0	24.0	24.0
1500		6.0	6.0	6.0	6.0	6.0	6.0	18.5	18.5	18.5	18.5	18.5	18.5	18.5	18.5	24.0	24.0	24.0	24.0	24.0	24.0
2000		1.9	1.9	1.9	1.9	1.9	1.9	14.8	14.8	14.8	14.8	14.8	14.8	14.8	14.8	24.0	24.0	24.0	24.0	24.0	24.0
2500		1.0	1.0	1.0	1.0	1.0	1.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.6	14.6	14.6	14.6	14.6	14.6
3000		0.3	0.3	0.3	0.3	0.3	0.3	7.6	7.6	7.6	7.6	7.6	7.6	7.6	7.6	7.0	7.0	7.0	7.0	7.0	7.0
3500		0.0	0.0	0.0	0.0	0.0	0.0	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.7	1.7	1.7	1.7	1.7	1.7
4000		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Wind (% ELCC)		
Load Level		All-
(MW)	Existing	years
0	20.1	20.1
800		19
1000		12
1200		7
1400		1

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF PUBLIC SERVICE)
APPLICATION FOR APPROVAL OF PURCHASED)
POWER AGREEMENT, ENERGY STORAGE) Case No. 24-00271-UT
CONVENIENCE AND NECESSITY FOR SYSTEM)
RESOURCES IN 2028)
PUBLIC SERVICE COMPANY OF NEW)
MEXICO,)
Applicant)
	_)

AFFIDAVIT

STATE OF NEW MEXICO)) ss COUNTY OF BERNALILLO)

THOMAS P. DUANE, Director, Integrated Resource Planning at Public

Service Company of New Mexico, upon being duly sworn according to law, under oath,

deposes and states: I have read the foregoing Direct Testimony of Thomas P. Duane

and it is true and accurate based on my own personal knowledge and belief.

Dated this 22nd day of November, 2024

/s/_Thomas P. Duane THOMAS P. DUANE