NEW MEXICO RURAL ELECTRIC COOPERATIVE ASSOCIATION

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enchantment Magazine
The Voice of New Mexico's Rural Electric Cooperatives

August 1, 2022

The Honorable Michelle Lujan Grisham
Governor, State of New Mexico
State Capitol, Room 400
490 Old Santa Fe Trail
Santa Fe, NM 87501

Re: Electric Grid Reliability Concerns

Dear Governor Lujan Grisham:

The reliability of the electric grid is a growing concern for the leaders of the rural electric cooperatives that serve the great state of New Mexico. With increasing demand for electricity, early retirements of baseload generation, growing reliance on non-dispatchable generation resources, expensive natural gas prices, and more extreme weather events, we feel obligated to notify governmental leaders and policymakers of our growing concerns over grid reliability and the increasing risk of power shortages that may lead to rolling blackouts, extreme pricing, and most importantly, potential endangerment to the health and lives of the people of New Mexico.

While the Energy Transition Act (ETA) was making its way through the New Mexico Legislature, our statewide organization, the New Mexico Rural Electric Cooperative Association, lobbied for inclusion of achievability offramps in the bill. Those efforts resulted in final legislation stating the renewable energy goals set forth by the ETA for rural cooperatives had to be 1) affordable; 2) reliable; and 3) technologically feasible.

This May, the North American Electric Reliability Corporation (NERC), which is the entity tasked by the Federal Energy Regulatory Commission (FERC) to oversee grid reliability, issued an assessment warning that several parts of North America, including New Mexico, "…are at elevated or high risk of energy shortfalls this summer." NERC's press release cited capacity shortfalls "due to generator retirements and increased demand", as well as "widespread drought and below-normal snowpack…" having "the potential to lead to lower than average output from hydro generators."

As you know, Public Service Company of New Mexico (PNM) requested and received permission to delay closure on one of the units at the San Juan Generating Station due

to summer reliability concerns. Within the last two years, we have all seen examples from California, Texas, Oklahoma, other Midwestern states, and to a lesser extent regions of New Mexico, where utilities faced resource adequacy issues and periods when electricity was neither affordable nor reliable.

During Winter Storm Uri in February 2021, some New Mexicans within the Southwest Power Pool (SPP) footprint have already experienced the impacts that can result from lengthy periods of high demand due to extreme temperatures, limited wind resource, and limited natural gas supply, which resulted in record energy prices and load shedding events. Our two cooperative wholesale suppliers, Western Farmers Electric Cooperative (WFEC) and Tri-State Generation & Transmission Association (Tri-State), experienced increased power costs from this storm, of $125.2M (spread over a 60-month period) and $12M, respectively. Tri-State was able to minimize the impacts of the storm because of its diverse portfolio and the ability to switch natural gas units to on-site fuel oil, which minimized natural gas purchases during record peak pricing. Had the storm tracked further to the west, the impacts to a broader portion of New Mexico would likely have been similar to outcomes in Texas, Oklahoma, and other states in the Midwest.

These are all early indicators that at a national and regional level, our environmental/energy policies, and the pace we are pursuing them, are introducing risks to grid reliability at the most critical times and when people rely on electricity the most. Given today's technological inability to affordably store noncarbon-based energy on a large scale, wind and solar are simply not reliable replacements for traditional dispatchable generation. Although they are great additions to a diverse generation mix that reduces carbon emissions, we believe we should proceed in this energy transition cautiously.

While there are resource adequacy risks in the western region of the U.S., New Mexico cooperatives remain confident in our ability to meet short-term goals of the ETA. Tri-State remains committed to its Responsible Energy Plan and does not have near-term resource adequacy concerns for its generation fleet given its current capacity position and planning reserve margin. WFEC and the four East Side New Mexico distribution members are part of the FERC approved SPP Regional Transmission Organization and the SPP Integrated,14 state power market. The WFEC portfolio of generation includes wind, solar, hydro, and fossil fuel, with renewable resources capable of meeting any New Mexico current and proposed requirements. WFEC, also, individually meets near-term capacity and reserve requirements of the SPP. However, we all recognize that there are ongoing challenges facing the entire electric utility industry that pose both near and long-term risks--the primary of these being supply chain disruptions and resource adequacy concerns. These risks are occurring at a time when much of the industry is transitioning to greater reliance on intermittent renewable resources and will need to be solved at a regional or national level.

As member-owned, locally governed, non-profit utilities, rural cooperatives are uniquely positioned to raise this concern with a certain level of unbiased trust. We don't have investors' profits/returns to consider. For us, it is all about our cooperative members and

safely delivering the reliable and affordable electric energy they depend on. It is on their behalf that we ask you to take a balanced, measured, methodical, and most importantly, a realistic approach to our energy transition, recognizing that our concerns for the climate must not come at the expense of grid reliability.

We hope this is just the beginning of many future, productive conversations. Please reach out to any or all of us with any questions you may have. Thank you for your time and attention in this important matter.

Sincerely,

New Mexico Rural Electric Cooperative Leaders

/s/ Keven J. Groenewold
Keven J. Groenewold, CEO
New Mexico Rural Electric Cooperative Association

/s/ Alena Brandenberger
Alena Brandenberger, CEO
Central New Mexico Electric Cooperative

/s/ Charles T. Pinson
Charles T. Pinson, Executive Vice-President and General Manager
Central Valley Electric Cooperative

/s/ Chris Martinez
Chris Martinez, Executive Vice-President and General Manager
Columbus Electric Cooperative

/s/ Robert E. Castillo
Robert E. Castillo, P.E., CEO and General Manager
Continental Divide Electric Cooperative

/s/ Les W.J. Montoya
Les W.J. Montoya, General Manager
Mora-San Miguel Electric Cooperative

/s/ Anthony Mercure
Anthony Mercure, Executive Vice-President & General Manager
Northern Rio Arriba Electric Cooperative

/s/ Mario A. Romero
Mario A. Romero, CEO and General Manager
Otero County Electric Cooperative

/s/ Jerry Partin
Jerry Partin, Interim General Manager
Roosevelt County Electric Cooperative

/s/ Denise Barrera
Denise Barrera, General Manager
Sierra Electric Cooperative

/s/ Joseph Herrera
Joseph Herrera, General Manager
Socorro Electric Cooperative

/s/ Travis Sullivan
Travis Sullivan, General Manager
Southwestern Electric Cooperative

/s/ David Spradlin
David Spradlin, CEO
Springer Electric Cooperative

/s/ Michael W. Hastings
Michael Hastings, CEO and
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/s/ Duane Highley
Duane Highley, CEO
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/s/ Gary R. Roulet
Gary R. Roulet, CEO
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