

BEFORE THE NEW MEXICO PUBUC REGULATION COMMISSION

**IN THE MATTER OF THE APPLICATION FOR)
VARIANCE FROM CERTAIN PROVISIONS OF)
17.9.570.10(C)(2) NMAC PER PRIOR NMPRC)
ORDER,)
JEMEZ MOUNTAINS ELECTRIC COOPERATIVE,)
INC.,)
Applicant.)
_____)**

Case No. 20-00242-UT

**APPLICATION OF
JEMEZ MOUNTAINS ELECTRIC COOPERATIVE, INC.
FOR VARIANCE FROM CERTAIN PROVISIONS OF 17.9.570.10(C)(2) NMAC
PER PRIOR NMPRC ORDER**

Jemez Mountains Electric Cooperative, Inc. (“JMEC”), by and through its attorneys, Cuddy & McCarthy, LLP, and pursuant to 17.9.570.13(L) NMAC (“Rule 570.13(L)”), requests approval from the New Mexico Public Regulation Commission (“Commission” or “NMPRC”) for a variance from certain provisions of 17.9.570.10(C)(2) NMAC, (“Rule 570.10(C)(2)”), related to the billing that JMEC completes to its net metering consumers under its Rate No. 14, Standard Tariff for Electricity Purchases from and Sales to Qualifying Facilities (“Rate 14”), per the Commission’s prior order given the limitations JMEC has in the billing software utilized by its billing vendor. In support of its Application, JMEC states:

1. JMEC is certificated and authorized to conduct the business of providing public electric utility service within the State of New Mexico, and is a public utility as defined in the Public Utility Act, NMSA 1978 § 62-3-1 *et seq.*, as amended. JMEC’s primary business office is located at is 19365 S.R. 84/285, Hernández, New Mexico 87537.

2. JMEC provides electric service to approximately 31,200 electric service consumers in its service territory that encompasses approximately 3,800 square miles located

throughout five (5) counties in the State of New Mexico, including McKinley, Rio Arriba, Sandoval, San Juan and Santa Fe counties.

3. JMEC does not own any base load electric generation facilities, and owns or purchases a limited amount of solar energy from qualifying facilities (“QFs”) owned by its consumers pursuant to the NMPRC’s Rules in its efforts to meet the State of New Mexico’s statutory renewable energy portfolio standards. With the exception of this relatively small amount of renewable energy, all of JMEC’s power is currently purchased under long-term purchase power agreements (“PPA”) with Tri-State Generation and Transmission Association, Inc. (“TSGT”). JMEC is a distribution cooperative member of TSGT and relies upon TSGT as its wholesale full requirements power supplier.

4. The Commission’s Final Order Granting Joint Motion to Dismiss Formal Complaint in Case No. 19-00225-UT (dated June 10, 2020), (“Final Order”), dismissed the formal complaint made by members of JMEC regarding JMEC’s compliance with 17.9.570 NMAC (“Rule 570”) regarding Cogeneration and Small Power Production, among other things. The mediated settlement in Case No. 19-00225-UT resulted in an agreement that JMEC would, among other things, ensure that its Rate 14 complied with NMPRC Rule 570 for electricity purchases from and sales to QFs. The parties in the case, including the Staff of the Utility Division of Commission (“Staff”), recognized the billing software limitations JMEC had that prohibited JMEC from complying with the payment provisions of NMPRC Rule 570.10(C)(2) and JMEC committed to seek approval of a variance from the NMPRC to make annual payments of the amounts required under Rule 570.10(C)(2), as opposed to making those payments in the billing month following the point when the net metering consumer reached the \$50.00 benchmark, within one (1) year after the NMPRC’s Final Order approving settlement and dismissal of the formal complaint case. *See*, Final Order at ¶ 10.

5. JMEC is submitting its Application for Variance in conjunction with the submission of its Advice Notice No. 109 to make revisions to its Rate 14 tariff. All parties in

Case No. 19-00225-UT, including the Complainants in that case, agreed with JMEC seeking a variance from the NMPRC and the parties agreed to support the Commission granting JMEC's request for variance to allow JMEC to complete the payout to net metering consumers on an annual basis. *See*, Final Order at ¶ 10.

6. The billing software utilized by JMEC's billing vendor does not currently allow for JMEC to comply with one element of the billing requirement in NMPRC Rule 570.10(C)(2) for net metering consumers. Specifically, NMPRC Rule 570.10(C)(2) requires that "[i]f a net amount is owed to the qualifying facility and is \$50 or more, the utility shall make payment to the qualifying facility prior to the end of the net billing period," i.e., prior to the next monthly bill. JMEC requests a variance from this provision of NMPRC Rule 570.10(C)(2) to be able to make this payment on an annual basis, as opposed to a monthly basis once the net metering consumer's account has hit the \$50.00 trigger mark. The billing parameters utilized by its billing contractor, Southeastern Data Corporation ("SEDC"), do not enable JMEC to identify this data point for its net metering consumers on a monthly basis due to limitations in the billing software. *See*, Prepared Direct Testimony of Ernesto Gonzales and Attachments, at 4-5. Given these limitations, JMEC does not currently have the capability with the billing software utilized by SEDC to identify when the balance for a net metering consumer reaches the \$50.00 trigger point for payment to the consumer on a month-to-month basis. *Id.* As a result, JMEC's billing software limitations have not enabled it to complete the monthly payment when the credit balance amount of a net metering consumer hits the \$50.00 trigger mark in a given month. *Id.* at 5.

7. JMEC recognizes one of the policy objectives of Rule 570 is for the utility to purchase kilowatt hours ("kWhs") generated by consumer owned renewable energy QFs. To overcome the limitation in JMEC's billing software, JMEC has been operating under a billing procedure whereby all net metering accounts, which are approximately 300 meters on JMEC's system, are manually evaluated once a year on April 30 to determine the level of the excess

kWhs for the prior twelve (12) months, and any excess kWhs for the prior 12 month period are purchased by JMEC with a payment to the QF. *Id.* at 5-6. JMEC has relied upon this procedure of making this manual accounting calculation once a year to meet the requirement that JMEC purchase renewable energy from net metering consumers under NMPRC Rule 570, but it does not impose an undue administrative and cost burden on JMEC by having to make the manual accounting and calculation every month for these 300 meters. *Id.* JMEC makes the payout of these net metering consumers after the annual accounting calculation has been completed, which has historically demonstrated that only a few dozen net metering consumers qualify for the payout of \$50.00 or more. *Id.*

8. JMEC has considered the potential for implementing a change to its billing software to enable JMEC to identify on a monthly basis those net metering consumers whose renewable energy credits on a monthly basis reach or exceed the \$50.00 benchmark. *Id.* at 6-7. JMEC was informed by SEDC that to make such a revision would take the development of revisions to the billing software and it would need to go through an implementation process to effectuate the change. *Id.* JMEC was advised that the cost of making this change in the billing software was in excess of five-thousand dollars (\$5,000.00). *Id.* After consideration of this cost for the benefit of only a few dozen consumers, and in light of the growing delinquency rate in payments by residential consumers during this period when JMEC is limited in its ability to collect arrearages due to the NMPRC's orders in effect during the emergency health orders in place related to the coronavirus pandemic, JMEC has determined now is not the appropriate time to expend these resources for the benefit of a few dozen consumers and it would be unreasonable to do so. *Id.* At some point in the future when the circumstances permit and the cost/benefit analysis is better, JMEC may proceed to incur this cost to implement this revision its billing software at that time.

9. The Commission's grant of JMEC's Application for Variance will not result in the policy objective of renewable energy being purchased from JMEC's consumers being frustrated

or otherwise not met. JMEC will continue completing its billing procedure whereby all net metering accounts, which are approximately 300 meters, will be manually evaluated on April 30th of every year to determine if the level of the excess kWhs for the prior 12 months is \$50.00 or more, and any such excess kWhs for the prior 12 month period will be purchased by JMEC with a payment to the net metering consumer. *Id.* at 7. JMEC's continued reliance on this manual accounting calculation once a year will serve to meet the requirement that JMEC purchase renewable energy generated by consumer owned QFs under NMPRC Rule 570.

10. JMEC is not requesting a variance from any other provision of Rule 570 at this time. *Id.* The only provision of NMPRC Rule 570.10 that JMEC is requesting a variance for is Rule 570.10(C)(2). JMEC requests a variance from this provision of NMPRC Rule 570.10(C)(2) to be able to make this payment to net metering consumers on an annual basis, as opposed to a monthly basis once the net metering consumer's account has hit the \$50.00 trigger mark. Granting JMEC's request for variance from this provision of NMPRC Rule 570.10(C)(2) will enable JMEC to continue to meet the requirement that JMEC purchase renewable energy from net metering consumers under Rule 570, but will do so on an annual basis.

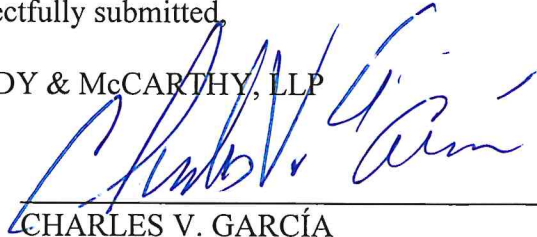
11. JMEC also files herewith the testimony and attachments of its General Manager, Mr. Ernesto Gonzales, in support of this Application.

WHEREFORE, JMEC requests that the Commission approve JMEC's Application for Variance from NMPRC Rule 570.10(C)(2), to enable JMEC to continue completing its manual accounting calculation for its approximately 300 net metering consumers once a year in order to meet the requirement that JMEC purchase renewable energy generated by consumer owned QFs under NMPRC Rule 570, as described in the testimony and attachments of Mr. Gonzales, and for such further relief as the Commission may deem appropriate.

Respectfully submitted,

CUDDY & McCARTHY, LLP

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ATTORNEYS FOR JEMEZ MOUNTAINS ELECTRIC
COOPERATIVE, INC.

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE APPLICATION FOR)
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JEMEZ MOUNTAINS ELECTRIC COOPERATIVE,)
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Case No. _____

**PREPARED DIRECT TESTIMONY AND ATTACHMENTS
OF
ERNESTO GONZALES**

December 31, 2020

**DIRECT TESTIMONY OF
ERNESTO GONZALES
NMPRC Case No. _____**

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.

A. My name is Ernesto Gonzales. I am the General Manager for Jemez Mountains Electric Cooperative, Inc. (“JMEC”). My business address is 19365 S.R. 84/285, Hernández, New Mexico 87537. I am the General Manager of JMEC and have been in my current position with JMEC since October 29, 2019.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE AND DUTIES AT JMEC.

A. I have been involved in the operation and management of several rural electric cooperatives in New Mexico, including JMEC, Kit Carson Electric Cooperative, Inc., and Mora-San Miguel Electric Cooperative, Inc., in a variety of capacities for over thirty-five (35) years. I have been employed by JMEC for a period of nine (9) years beginning in 2005. I have held several positions over that time at JMEC including Director of Finance and General Manager on three different occasions, including 2009 – 2010 and 2013 - 2014. In October 2019, I took my current position as JMEC’s General Manager and have been in that position for JMEC since that time. As the senior officer for JMEC, I am responsible for the overall operations of JMEC, including its electric distribution utility operations. All major utility areas of JMEC report to me, including engineering, customer service, billing, operations and maintenance, accounting and finance, and compliance. I report to JMEC’s Board of Trustees.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony will support and explain JMEC’s Application for Variance from Certain Provisions of 17.9.570.10(C)(2) NMAC (“Rule 570.10(C)(2)”), (“Application”), as part of its Advice Notice No. 109 to make revisions to JMEC’s Rate No. 14, Standard Tariff for Electricity Purchases From and Sales to Qualifying Facilities (“QFs”), (“Rate 14”). The purpose of JMEC’s Application is to request approval from the New Mexico Public

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Regulation Commission's ("Commission" or "NMPRC") for a variance from one of the requirements in NMPRC Rule 570.10(C)(2), which is a billing implementation requirement under the Commission's rule. Rule 570.10(C)(2) requires that for consumer owned QFs for which JMEC is providing net metering under Rule 570, "at the end of the billing period the utility shall net all charges owed to the utility by the qualifying facility and all payments by the utility to the qualifying facility. . . If a net amount is owed to the qualifying facility and is \$50.00 or more, the utility shall make payment to the qualifying facility prior to the end of the net billing period." JMEC does not currently have the capability in its billing system to identify which Rate 14 net metering consumers reach the \$50.00 benchmark in net QF purchases in a billing month that would qualify them for a payout under the provisions of Rule 570.10(C)(2). Additionally, the number of Rate 14 net metering consumers that qualify for the payout on an annual basis is so low that expending JMEC's resources at this time to have new billing software programmed and installed would not be efficient when JMEC has been and will continue to complete the purchase of renewable energy from those limited net metering consumers whose balance is \$50.00 or more on an annual basis. Through the reconciliation and payment process that JMEC completes on an annual basis, JMEC will continue to achieve the objective of NMPRC Rule 570 by paying out amounts of \$50.00 or more owed to net metering consumers for purchases of energy generated by their QFs, but will make the payment to them once a year, as opposed to in the month following when the QF reaches the \$50.00 benchmark.

Q. PLEASE DESCRIBE JMEC.

A. JMEC is a not-for-profit, rural electric cooperative organized and existing under the New Mexico Rural Electric Cooperative Act and provides electric utility service to members and consumers in five (5) counties in New Mexico, including McKinley, Rio Arriba, Sandoval, San Juan and Santa Fe. As noted above, JMEC has its principal place of business and is headquartered in Hernández, New Mexico. JMEC also has district offices

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located in Cuba, New Mexico; and in Jemez Springs, New Mexico. JMEC's service area encompasses approximately 3,800 square miles throughout these counties and serves approximately 31,200 accounts. JMEC's electric utility service area includes eight (8) Native American Pueblos and two (2) Native American Nations. The Pueblos JMEC serves include Jemez, Nambé, Ohkay Owingeh, Pojoaque, San Ildefonso, Santa Ana, Santa Clara, and Zia. JMEC also serves the Jicarilla Apache and Navajo Nations. JMEC's service territory is complex in that in many instances the electric services provided to Tribal entities include consumers located on Tribal lands held by and for a particular Native American Government that contain Tribal members as well as non-Tribal member consumers located on private lands held in fee within the exterior boundaries of the Tribal Government. Regardless of whether consumers are Tribal members or non-Tribal members located on private fee lands located within the exterior boundaries of the Native American Government, wherever a meter is located that JMEC serves, they are JMEC consumers subject to JMEC's rules and regulations for utility service.

Q. IS JMEC A PUBLIC UTILITY WITHIN THE MEANING OF THE NEW MEXICO PUBLIC UTILITY ACT?

A. Yes. JMEC renders electric public utility service to its members and consumers in the counties in New Mexico described above pursuant to the New Mexico Public Utility Act.

Q. PLEASE EXPLAIN THE REASON WHY JMEC IS SEEKING A VARIANCE FROM ONE PROVISION OF NMPRC RULE 570.10(C)(2)?

A. The NMPRC's Final Order Granting Joint Motion to Dismiss Formal Complaint in Case No. 19-00225-UT (dated June 10, 2020), ("Final Order"), dismissed the formal complaint made by members of JMEC regarding JMEC's compliance with Rule 570 regarding Cogeneration and Small Power Production, among a number of other things. The

**DIRECT TESTIMONY OF
ERNESTO GONZALES
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mediated settlement in Case No. 19-00225-UT resulted in an agreement that JMEC would, among other things, ensure that its Rate 14 complied with NMPRC Rule 570 for electricity purchases from and sales to QFs. The parties in the case, including the Staff of the Utility Division of Commission (“Staff”), recognized the billing software limitations JMEC had that prohibited JMEC from complying with the payment provisions of NMPRC Rule 570.10(C)(2) and JMEC committed to seek approval of a variance from the NMPRC to make annual payments of the amounts required under 570.10(C)(2), as opposed to making those payments in the billing month following the point when the net metering consumer reached the \$50.00 benchmark. JMEC agreed to make its request for variance within one (1) year after the NMPRC’s Final Order approving settlement and dismissal of the formal complaint case. JMEC is submitting its application for variance in conjunction with the submission of its Advice Notice No. 109 to make revisions to its Rate 14 tariff. All parties in Case No. 19-00225-UT agreed with JMEC requesting the variance from the NMPRC and the parties agreed to support the Commission granting JMEC’s request for variance to allow JMEC to complete the payout to net metering consumers on an annual basis.

Q. PLEASE DESCRIBE THE CURRENT BILLING SITUATION FOR JMEC’S NET METERING CONSUMERS THAT NECESSITATES THE NEED FOR A VARIANCE FROM THE REQUIREMENTS OF RULE 570.10(C)(2)?

A. JMEC has approximately three-hundred (300) interconnected meters that have interconnection agreements with JMEC for their renewable energy systems, the vast majority of which are solar projects connected to the consumers’ residence. These 300 net metering consumers under Rate 14 represent, out of its approximately 31,200 consumers, approximately one percent (1%) of its consumers. The vast majority of these net metering consumers are residential consumers. JMEC recognizes that the requirement in NMPRC Rule 570.10(C)(2) is that if a net amount is owed to the QF and is \$50.00 or more, the utility is required to make payment to the QF prior to the end of

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the next billing period. However, JMEC identified in NMPRC Case No. 19-00225-UT that the billing parameters utilized by its billing contractor, Southeastern Data Corporation, did not enable JMEC to identify this data point for its net metering consumers on a monthly basis due to limitations in its billing software. Given these limitations, JMEC does not currently have the capability in its billing software to identify when the balance for a net metering consumer reaches the \$50.00 trigger point for payment to the consumer on a month-to-month basis. As a result, JMEC's billing limitations have not enabled it to complete the monthly payment when a net metering consumer hits the \$50.00 mark in a given month.

Q. PLEASE EXPLAIN THE MANNER IN WHICH JMEC HAS MET THE REQUIREMENT FOR JMEC TO MAKE PAYMENTS TO NET METERING CONSUMERS WHOSE NET METERING BALANCE IS \$50.00 OR MORE UNDER RULE 570.10(C)(2)?

A. To address the limitation in JMEC's billing software, JMEC has been operating under a billing procedure whereby all net metering accounts, which are approximately 300 meters, are manually evaluated once a year on April 30 to determine the level of the excess kilowatt hours ("kWhs") for the prior twelve (12) months, and any excess kWhs for the prior 12 month period are purchased by JMEC with a payment to the QF. JMEC has relied upon this procedure of making this manual accounting calculation once a year to meet the requirement that JMEC purchase kWhs generated by renewable energy QFs under NMPRC Rule 570 because it does not impose an undue administrative and cost burden on JMEC by having to make the manual accounting and calculation every month for these 300 meters. JMEC makes the payout of these net metering consumers after the annual accounting calculation has been completed, which has historically demonstrated that only a few dozen net metering consumers qualify for the payout of \$50.00 or more. To demonstrate, the 2019 annual purchase calculation under Rate 14 completed in May 2019 resulted in JMEC identifying thirty-four (34) net metering consumers containing

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balances in excess of \$50.00, ranging from \$50.43 to \$328.64, reflected in Attachment 1 to my testimony. The total value of the purchases for these excess kWhs balances for these 34 net metering consumers was \$4,216.33. *See* Attachment 1. The most recent annual purchase calculation under Rate 14 was completed in May 2020, and resulted in JMEC identifying forty (40) net metering consumers containing balances in excess of \$50.00, ranging from \$50.14 to \$376.83, reflected in Attachment 2 to my testimony. The total value of the purchases for these excess kWhs balances for these 40 net metering consumers was \$5,552.24. *See* Attachment 2. The majority of these excess kWhs reached or exceeded the \$50.00 value amounts over the course of more than a single year.

Q. HAS JMEC INQUIRED OF ITS BILLING CONTRACTOR ABOUT THE COST OF IMPLEMENTING A CHANGE TO ITS BILLING SOFTWARE TO ACHIEVE A MONTHLY PAYOUT TO NET METERING CONSUMERS?

A. Yes. JMEC has been in communication with SEDC regarding the potential for implementing a change to its billing software to enable JMEC to identify on a monthly basis those net metering consumers whose renewable energy credits on a monthly basis reach or exceed the \$50.00 benchmark. JMEC was informed that to make such a revision would take the development of revisions to the billing software and it would need to go through an implementation process to effectuate the change. JMEC was advised that the cost of making this change in the billing software was in excess of five-thousand dollars (\$5,000.00). After consideration of this cost for the benefit of only a few dozen consumers, and in light of the growing delinquency rate in payments by residential consumers when JMEC is prohibited by NMPRC order from collections and disconnection efforts during this coronavirus pandemic, JMEC has determined now is not the appropriate time to expend these resources for the benefit of a few dozen consumers and it would be unreasonable to do so. At some point in the future when the number of net metering consumers has grown and the number who qualify for payout on a monthly basis increases, then JMEC will be able to spread the recovery of the cost of making this

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change in its billing software over a larger number of consumers, and JMEC may proceed to implement this revision its billing software at that time.

Q. WILL JMEC’S VARIANCE FROM RULE 570.10(C)(2), IF GRANTED, RESULT IN NET METERING CONSUMERS NOT GETTING PAID FOR RENEWABLE ELECTRIC ENERGY GENERATED BY THEIR INSTALLED QFs?

A. No. JMEC will continue completing its billing procedure whereby all net metering accounts, which are approximately 300 meters, will be manually evaluated on April 30th of every year to determine if the level of the excess kWhs for the prior 12 months is \$50.00 or more, and any such excess kWhs for the prior 12 month period will be purchased by JMEC with a payment to the net metering consumer. JMEC’s continued reliance on this manual accounting calculation once a year will serve to meet the requirement that JMEC purchase renewable energy generated by consumer owned QFs under NMPRC Rule 570.

Q. IS JMEC REQUESTING A VARIANCE FROM ANY OTHER PROVISION OF RULE 570.10?

A. No, not at this time. The only provision of NMPRC Rule 570.10 that JMEC is requesting a variance for is Rule 570.10(C)(2), and specifically the provision that “[i]f a net amount is owed to the qualifying facility and is \$50 or more, the utility shall make payment to the qualifying facility prior to the end of the net billing period.” JMEC’s requests a variance from this provision of NMPRC Rule 570.10(C)(2) to be able to make this payment on an annual basis, as opposed to a monthly basis once the net metering consumer’s account has hit the \$50.00 trigger mark. Granting JMEC’s request for variance from this provision of NMPRC Rule 570.10(C)(2) will enable JMEC to continue to meet the requirement that JMEC purchase renewable energy from net metering consumers under Rule 570, but will do so on an annual basis.

**DIRECT TESTIMONY OF
ERNESTO GONZALES
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Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes

ATTACHMENT NO. 1

TO

Direct Testimony of Ernesto Gonzales

TO

**APPLICATION OF JEMEZ MOUNTAINS ELECTRIC
COOPERATIVE, INC. FOR VARIANCE FROM
CERTAIN PROVISIONS OF 17.9.570.10(C)(2) NMAC PER
PRIOR NMPRC ORDER**

ATTACHMENT NO. 2

TO

Direct Testimony of Ernesto Gonzales

TO

**APPLICATION OF JEMEZ MOUNTAINS ELECTRIC
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PRIOR NMPRC ORDER**

2020 Solar Payout Check List

MBRSEP	NAME	COADDR	ADDR1	ADDR2	ADDR3	ZIP	RATE	RIGHTWAY	Payout @ Avoided Cost
1					DIXON NM	87527-0458	0050	3,300	\$93.75
2					JAPAN 719 1106	99999-0000	0050	2,116	\$60.12
3					SANTA FE NM	87506-2660	0506	3,715	\$105.54
4					JEMEZ PUEBLO NM	87024-0000	0050	7,536	\$214.10
5					ESPANOLA NM	87532-2416	0060	6,969	\$197.99
6					SANTA FE NM	87506-8753	0505	1,974	\$56.08
7					ESPANOLA NM	87532-3180	0507	4,360	\$123.87
8					TRUCHAS NM	87578-0338	0050	2,800	\$79.55
9					ESPANOLA NM	87532-9816	0507	2,074	\$58.92
10					ESPANOLA NM	87532-3188	0050	3,124	\$88.75
11					STUDIO CITY CA	91604-3831	0050	10,270	\$291.77
12					JEMEZ SPRINGS NM	87025-0188	0060	5,661	\$160.83
13					FAIRVIEW NM	87533-4095	0050	1,765	\$50.14
14					VELARDE NM	87582-0584	0050	11,405	\$324.02
15					ALCALDE NM	87511-0474	0050	5,469	\$155.37
16					DIXON NM	87527-0010	0050	3,306	\$93.92
17					LA JARA CO	81140-0092	0507	3,906	\$110.97
18					COLLEGE STATION TX	77840-0000	0050	2,961	\$84.12
19					SANTA FE NM	87506-0000	0050	2,007	\$57.02
20					SANTA FE NM	87506-0000	0050	6,410	\$182.11
21					SANTA CRUZ NM	87567-0000	0050	1,765	\$50.14
22					SANTA FE NM	87506-2066	0506	8,673	\$246.40
23					VELARDE NM	87582-0555	0050	4,250	\$120.74
24					ESPANOLA NM	87532-9749	0507	2,328	\$66.14
25					SANTA CRUZ NM	87567-0977	0050	2,433	\$69.12
26					ALBUQUERQUE NM	87106-0000	0050	3,340	\$94.89
27					ALBUQUERQUE NM	87107-0000	0050	7,944	\$225.69
28					ESPANOLA NM	87532-9802	0347	2,154	\$61.20
29					SANTA FE NM	87506-7215	0504	13,264	\$376.83
30					SAN YSIDRO NM	87053-0142	0050	5,619	\$159.64
31					LOS ALAMOS NM	87547-0000	0050	4,940	\$140.35
32					ALCALDE NM	87511-0721	0050	2,444	\$69.43
33					SANTA FE NM	87506-9770	0505	6,079	\$172.70
34					SANTA FE NM	87506-7258	0604	6,848	\$194.55
35					ESPANOLA NM	87532-0790	0607	4,416	\$125.46
36					HERNANDEZ NM	87537-0000	0050	5,925	\$168.33
37					SANTA FE NM	87504-9257	0050	1,803	\$51.22
38					SANTA FE NM	87505-4658	0050	3,881	\$110.26
39					ALCALDE NM	87511-0902	0050	5,734	\$162.90
40					DIXON NM	87527-0000	0050	10,465	\$297.31
								Total:	\$5,552.24

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

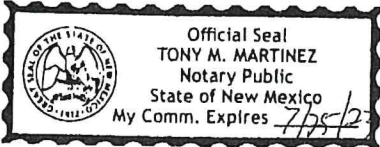
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VERIFICATION

STATE OF NEW MEXICO)
COUNTY OF RIO ARRIBA)

I, Ernesto Gonzales, being first duly sworn upon my oath, depose and state that I have read the foregoing Direct Testimony and it is true to the best of my knowledge.



[Signature]
ERNESTO GONZALES

SUBSCRIBED AND SWORN TO before me this 18 day of December, 2020 by Ernesto Gonzales.

[Signature]
NOTARY PUBLIC

My Commission Expires:
7-25-23

BEFORE THE NEW MEXICO PUBUC REGULATION COMMISSION

**IN THE MATTER OF THE APPLICATION FOR)
VARIANCE FROM CERTAIN PROVISIONS OF)
17.9.570.10(C)(2) NMAC PER PRIOR NMPRC)
ORDER,)
)
JEMEZ MOUNTAINS ELECTRIC COOPERATIVE,)
INC.,)
Applicant.)
_____)**

Case No. 20-00242-UT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing "Application for Variance from Certain Provisions of 17.9.570.10(C)(2) NMAC per Prior NMPRC Order," of Jemez Mountains Electric Cooperative, Inc., was emailed this 31st day of December, 2020 to the following counsel and parties of record:

Bradford Borman, Staff Counsel NM Public Regulation Commission P.O. Box 1269 Santa Fe, NM 87504 Bradford.Borman@state.nm.us	Milo Chavez, Utility Division NM Public Regulation Commission P.O. Box 1269 Santa Fe, NM 87504 milo.chavez@state.nm.us	Ernesto Gonzales General Manager Jemez Mountains Electric Cooperative, Inc. P.O. Box 128 Española, New Mexico 87532 egonzales@jemezcoop.org
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Charles V. Garcia