



## **Filing Receipt**

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PUC DOCKET NO. 56954**

<b>APPLICATION OF TEXAS-NEW MEXICO POWER COMPANY FOR APPROVAL OF A SYSTEM RESILIENCY PLAN</b>	<b>§ § § §</b>	<b>PUBLIC UTILITY COMMISSION   OF TEXAS</b>
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**TEXAS-NEW MEXICO POWER COMPANY’S OBJECTIONS AND RESPONSES TO  
TEAM’S FIRST REQUEST FOR INFORMATION**

TEXAS-NEW MEXICO POWER COMPANY (“TNMP”) files these objections and responses to TEAM’s First Request for Information to Texas New-Mexico Power Company. Per agreement between the parties, TNMP’s objections and responses to TEAM’s First RFIs are due October 25, 2024. These objections and responses are therefore timely. All parties may treat the answers as if they were filed under oath.

TNMP files these objections and responses without agreeing to the relevance of the information sought and without waiving its right to object at the time of the hearing to the admissibility of information produced herein.

Respectfully submitted,

*/s/ Stephanie C. Sparks*

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**ATTORNEYS FOR TEXAS-NEW MEXICO  
POWER COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25<sup>th</sup> day of October 2024, a true and correct copy of the foregoing document was transmitted to the parties of record in accordance with the Order Suspending Rules, issued in Project No. 50664.

*/s/ Stephanie C. Sparks*

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Stephanie C. Sparks

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-1.** Please provide any analyses performed or other documents quantifying any estimated reduction to system restoration costs that will result if the System Resiliency Plan (SRP) is implemented as proposed.

Prepared by: Jason De Stigter

Sponsored by: Jason De Stigter

**RESPONSE:** Section 6.0 of the Appendix 9.7 – 1898 & Co. Report: TNMP System Resiliency Investment Study, under the “Evidence of Effectiveness and Benefits” subsection for each measure, includes the avoided restoration costs at the investment level for the following measures:

- Distribution System Resiliency, Section 6.1.4
- Distribution System Protection Modernization, Section 6.2.4
- Flood Mitigation, Section 6.4.4

The analysis results are included in the following attachments that were submitted in response to TIEC 1-1:

- TIEC 1-1 Distribution Overhead Hardening.xlsx
- TIEC 1-1 Inspection Distribution Overhead Hardening.xlsx
- TIEC 1-1 Backbone Reclosing.xlsx
- TIEC 1-1 Lateral Reclosing.xlsx
- TIEC 1-1 Substation Flood Mitigation BCA.xlsx

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-2.** Please provide the “exhaustive analysis” of past weather events used to inform the SRP.

Prepared by: Jason De Stigter

Sponsored by: Jason De Stigter

**RESPONSE:** Please refer to Appendix 9.7 – 1898 & Co. Report. TNMP System Resiliency Investment Study for the analysis of weather events. Section 3.0 includes details and analysis for the varieties and quantities of extreme weather and tropical cyclone events that informed the TNMP SRP. Section 4.0 describes the resiliency and risk-based planning approach to further analyze weather events.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-3.** Please provide any analyses performed by TNMP comparing the costs and benefits of a three-year timeline for the implementation of the SRP to the costs and benefits of a longer implementation timeline.

Prepared by: Jason De Stigter, Christopher Gerety

Sponsored by: Jason De Stigter, Christopher Gerety

**RESPONSE:** No analyses comparing the costs and benefits of a three-year timeline for the implementation of the SRP to the costs and benefits of a longer implementation timeline for implementation of the SRP have been performed.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-4.** Does the three-year timeline proposed for the implementation of the SRP increase the number of outside contractors TNMP must use to implement the proposed resiliency measures? Please provide all available documents supporting your response.

Prepared by: Christopher Gerety, Keith Nix

Sponsored by: Christopher Gerety, Keith Nix

**RESPONSE:** Please refer to TNMP's response to TEAM 1-3. TNMP has not completed an analysis comparing the costs and benefits of a three-year implementation timeline in comparison to a longer implementation timeline. Accordingly, TNMP has not performed an analysis of the number of outside contractors that would be necessary in a scenario that employs a longer implementation timeline.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-5.** Reference the direct testimony of Christopher L. Gerety at 11:13–14. For Extreme Weather events, he discusses “winter storms, temperatures and wind chills below freezing, and extreme heat.”

- (a) Please provide any documents or analyses regarding how the above events differ from the summer and winter events described in 16 TAC § 25.55.
- (b) Please quantify and provide any documents or analyses regarding what efforts TNMP has undertaken to comply with weatherization requirements of 16 TAC § 25.55 since its implementation.
- (c) Please quantify and provide any documents regarding how the proposed resiliency measures differ from those undertaken in compliance with 16 TAC § 25.55.

Prepared by: Counsel

Sponsored by: Counsel

AGREEMENT: The parties have agreed to withdraw TEAM 1-5.



## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-6.** Reference the direct testimony of Christopher L. Gerety at 21:30–22:3. Please explain why and quantify how the Project and Portfolio Management and Reporting is specific to resiliency and not part of prudently incurring investment.

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**RESPONSE:** TNMP's SRP proposes a substantial capital expenditure, above and beyond its current operation, which requires careful oversight and will require reporting beyond what is required for normal operation. To ensure transparent and effective execution, we're committed to implementing a robust Project and Portfolio Management and Reporting (PPMR) program. This program will enable us to track key metrics, ensure our ability to complete measures and report the benefits recognized, and meet regulatory requirements of the SRP.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-7.** Reference the direct testimony of Christopher L. Gerety at 14:1–20. Please provide documents or analyses that show the specific criteria TNMP will use to determine whether equipment installations, upgrades, replacements, or any other efforts would be undertaken under the System Resiliency Plan or under the Annual Storm Hardening Plan pursuant to 16 TAC § 25.95(e) for the following:

- (a) Distribution poles
- (b) Transmission poles
- (c) Substation equipment and maintenance
- (d) Transmission system hardening
- (e) Distribution system hardening
- (f) Vegetation management

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**RESPONSE:** (a) Please see the testimony of TNMP witness Christopher Gerety on Page 14 lines 7-8, "TNMP installs hardened infrastructure when a project is required to address load growth or capital maintenance to replace end of life assets." Distribution poles that meet the above criteria are not targeted for replacement in TNMP's SRP and are qualified to be reported under the Annual Storm Hardening Plan.. Distribution Poles that do not meet the criteria above are targeted for replacement in TNMP's SRP.

(b) Transmission poles are not included in TNMPs SRP.

(c) Installation or replacement of Substation equipment in TNMP's SRP is limited to the distribution system protection modernization and flood mitigation measures. A specific list of projects is included in TNMP's SRP in appendix 9.2.No other substation equipment and maintenance projects will be completed as part of the SRP.

(d) Transmission system hardening is not included in TNMP's SRP.

(e) Please refer to TNMP's response to TEAM 1-7 (a)

(f) With respect to vegetation management activities the requirements of 16 TAC § 25.95 (e) are now included as part of 16 TAC § 25.96. TNMP's vegetation management activities can be found under its annual filings in PUCT Docket #41381.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-8.** Please provide any documents related to the quantity and cost of the following items that have been undertaken by TNMP for Annual Storm Hardening pursuant to 16 TAC § 25.95(e) over each of the last five years:

- (a) Distribution poles
- (b) Transmission poles
- (c) Substation equipment and maintenance
- (d) Transmission system hardening
- (e) Distribution system hardening
- (f) Vegetation management

Prepared by: Christopher Gerety, Keith Nix

Sponsored by: Christopher Gerety, Keith Nix

AGREEMENT: The parties have agreed to withdraw TEAM 1-8(b) and (d).

RESPONSE: (a) Please refer to TNMP's response to TIEC 1-5 and Cities 1-3. TNMP does not track the cost of work performed on distribution poles separate from the cost of other work on the circuit when work other than pole replacement is required.

(b) Withdrawn by agreement.

(c) Please refer to TNMP's response to TIEC 1-5 and Cities 1-3

(d) Withdrawn by agreement.

(e) Please refer to TNMP's response to TIEC 1-5 and Cities 1-3.

(f) With respect to vegetation management activities the requirements of 16 TAC § 25.95 (e) are now included as part of 16 TAC § 25.96. TNMP's vegetation management activities during the requested time period can be found under its annual filings in PUCT Docket #41381.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-9.** Please provide documents that demonstrate which specific items were installed, upgraded, or replaced by TNMP under Annual Storm Hardening pursuant to 16 TAC § 25.95(e) in the last five years that would be included in the System Resiliency Plan for:

- (a) Distribution poles
- (b) Transmission poles
- (c) Substation equipment and maintenance
- (d) Transmission system hardening
- (e) Distribution system hardening
- (f) Vegetation management

Prepared by: Christopher Gerety, Keith Nix

Sponsored by: Christopher Gerety, Keith Nix

**RESPONSE:** (a) Please refer to TNMP's response to Teams 1-7 (a). No items installed, upgraded, or replaced by TNMP under Annual Storm Hardening pursuant to 16 TAC § 25.95(e) in the last five years are included in the System Resiliency Plan.

(b) No transmission poles are being installed, upgraded, or replaced by TNMP as part of this SRP filing.

(c) No substation equipment or maintenance installed, upgraded, or replaced by TNMP under Annual Storm Hardening pursuant to 16 TAC § 25.95(e) in the last five years are included in the System Resiliency Plan

(d) No transmission poles are being installed, upgraded, or replaced by TNMP as part of this SRP filing.

(e) Please refer to TNMP's response to Teams 1-7 (a). No items installed, upgraded, or replaced by TNMP under Annual Storm Hardening pursuant to 16 TAC § 25.95(e) in the last five years are included in the System Resiliency Plan.

(f) With respect to vegetation management activities the requirements of 16 TAC § 25.95 (e) are now included as part of 16 TAC § 25.96. TNMP's vegetation management activities can be found under its annual filings in PUCT Docket #41381.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-10.** Please provide any documents related to which specific items that were undertaken by TNMP as a part of Annual Storm Hardening pursuant to 16 TAC § 25.95(e) that will require repair or replacement as a result of Hurricane Beryl:

- (a) Distribution poles
- (b) Transmission poles
- (c) Substation equipment and maintenance
- (d) Transmission system hardening
- (e) Distribution system hardening
- (f) Vegetation management

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**RESPONSE:**

(a) TNMP has not completed an item by item inventory of storm hardened distribution poles that were damaged and will require replacement or repair due to Hurricane Beryl.

(b) TNMP did not repair or replace any transmission poles as a result of Hurricane Beryl.

(c) TNMP did not repair or replace any “substation equipment and maintenance” as a result of Hurricane Beryl.

(d) TNMP did not repair or replace any “transmission system hardening” as a result of Hurricane Beryl.

(e) TNMP has not completed an item-by-item inventory of storm hardened distribution systems that were damaged and will require replacement or repair due to Hurricane Beryl.

(f) With respect to vegetation management activities the requirements of 16 TAC § 25.95 (e) are now included as part of 16 TAC § 25.96. TNMP’s vegetation management activities can be found under its annual filings in PUCT Docket #41381. Additional emergent vegetation management activities were necessary to restore electric service as a result of Hurricane Beryl and those amounts and activities are still under reconciliation at this time.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-11.** Please provide any documents related to the specific criteria TNMP will use to determine whether the hardening transmission and distribution facilities, vegetation management, and distribution pole inspections would be undertaken under the System Resiliency Plan or towards efforts reported under TNMP's Annual Report on Infrastructure Improvement and Maintenance pursuant to 16 TAC § 25.94, as reported in Docket No. 38068.

Prepared by: Christopher Gerety, Keith Nix

Sponsored by: Christopher Gerety, Keith Nix

**RESPONSE:** Please see the testimony of TNMP witness Christopher Gerety on Page 14 lines 7-8, "TNMP installs hardened infrastructure when a project is required to address load growth or capital maintenance to replace end of life assets." Infrastructure that would otherwise be implicated by TNMP's SRP that meets this criteria is not targeted for replacement in TNMP's SRP. Infrastructure that does not meet this criteria is targeted for replacement in TNMP's SRP.

With respect to vegetation management activities under the requirements of 16 TAC § 25.94 (c) are now included as part of 16 TAC § 25.96. TNMP's vegetation management activities and proposed work plan can be found under its annual filings in PUCT Docket #41381. Plans for vegetation management work under the SRP will be performed on a proactive cyclical basis.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-12.** Please provide any documents regarding the quantity and cost of the following items that have been undertaken by TNMP under efforts reported in the Annual Report on Infrastructure Improvement and Maintenance pursuant to 16 TAC § 25.94 in each of the last five years:

- (a) Hardening of transmission facilities
- (b) Hardening of distribution facilities
- (c) Vegetation management
- (d) Distribution pole inspections

Prepared by: Christopher Gerety, Keith Nix

Sponsored by: Christopher Gerety, Keith Nix

AGREEMENTS: The parties have agreed to withdraw TEAM 1-12(a).

RESPONSE: (a) Withdrawn by agreement.

(b) Please refer to TNMP's response to TIEC 1-5 and Cities 1-3. Additionally, please refer to TNMP filings in PUC Docket No. 38068 for years 2019 through 2024.

(c) With respect to vegetation management activities the requirements of 16 TAC § 25.94 (c) are now included as part of 16 TAC § 25.96. TNMP's vegetation management activities may be reviewed under its annual filings for years 2019 through 2024 in PUC Docket No. 41381 and describe the vegetation management efforts undertaken on its distribution system accordingly.

(d) Please refer to TNMP filings in PUC Docket No. 38068 for years 2019 through 2024.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-13.** Please provide any documents that demonstrate which specific items that were undertaken by TNMP and reported under 16 TAC § 25.94 in the last five years that will require repair or replacement as a result of Hurricane Beryl:

- (a) Hardening of transmission facilities
- (b) Hardening of distribution facilities
- (c) Vegetation management
- (d) Distribution pole inspections

Prepared by: Christopher Gerety, Keith Nix

Sponsored by: Christopher Gerety, Keith Nix

**RESPONSE:** (a) TNMP did not repair or replace any hardened transmission facilities reported under 16 TAC § 25.94 in the last five years that were damaged and will require replacement or repair due to Hurricane Beryl.

(b) TNMP has not completed an item-by-item inventory of hardened distribution facilities reported under 16 TAC § 25.94 in the last five years that were damaged and will require replacement or repair due to Hurricane Beryl.

(c) With respect to vegetation management activities the requirements of 16 TAC § 25.94 (c) are now included as part of 16 TAC § 25.96. TNMP's vegetation management activities can be found under its annual filings in PUCT Docket #41381. Additional emergent vegetation management activities were necessary to restore electric service as a result of Hurricane Beryl and those amounts and activities are still under reconciliation at this time.

(d) TNMP has not completed an item-by-item inventory of distribution poles inspected and reported under 16 TAC § 25.94 in the last five years that were damaged and will require replacement or repair due to Hurricane Beryl.



## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-14.** Please provide any documents that demonstrate which specific items were installed, upgraded, or replaced by TNMP under efforts pursuant to 16 TAC § 25.94 in the last five years that would also be included in the System Resiliency Plan for:

- (a) Hardening of transmission facilities
- (b) Hardening of distribution facilities
- (c) Vegetation management
- (d) Distribution pole inspections

Prepared by: Christopher Gerety, Keith Nix

Sponsored by: Christopher Gerety, Keith Nix

**RESPONSE:** Please see the testimony of TNMP witness Christopher Gerety on Page 14 lines 7-8, "TNMP installs hardened infrastructure when a project is required to address load growth or capital maintenance to replace end of life assets." Infrastructure that meets the above criteria is not targeted for replacement in TNMP's SRP. Infrastructure in scope of TNMP's SRP that do not meet the criteria above are targeted for replacement in TNMP's SRP. No infrastructure was installed, upgraded, or replaced by TNMP under efforts pursuant to 16 TAC § 25.94 in the last five years that would also be included in the System Resiliency Plan

With respect to vegetation management activities the requirements of 16 TAC § 25.94 (c) are now included as part of 16 TAC § 25.96. TNMP's vegetation management activities can be found under its annual filings in PUCT Docket #41381. The reported vegetation management activities will be distinct and separate from vegetation management activities included in the System Resiliency Plan due to the proactive nature of the vegetation management activities included within the Plan.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-15.** Please reference TNMP's Annual Report on Infrastructure Improvement and Maintenance Pursuant to 16 TAC § 25.94 in Docket No. 38068 filed on April 30, 2024. Please specifically identify what resiliency measures will be undertaken beyond those described as being planned or scheduled in this most recent report.

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**RESPONSE:** Please see the testimony of TNMP witness Christopher Gerety on Page 14 lines 7-8, "TNMP installs hardened infrastructure when a project is required to address load growth or capital maintenance to replace end of life assets." Infrastructure in scope of TNMP's SRP that meets the above criteria are not targeted for replacement in TNMP's SRP. Infrastructure in scope of TNMP's SRP that do not meet the criteria above are targeted for replacement in TNMP's SRP. All measures described in TNMP's SRP are being undertaken beyond or in addition to the measures identified in the referenced previous Annual Report on Infrastructure.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-16.** Please reference TNMP's Annual Report on Infrastructure Improvement and Maintenance Pursuant to 16 TAC § 25.94 in Docket No. 38068 filed on April 30, 2024. Please specifically identify which measures that had been planned or scheduled in this most recent report that have been changed to a resiliency measure, in part or in whole by TNMP Operating Area.

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**RESPONSE:** TNMP's filing in docket 38068 pursuant to 16 TAC § 25.94 on April 30, 2024 looks back over the calendar year 2023 and reports on completed efforts. Those completed efforts will not be reclassified as resiliency measures, programs or projects. Further, please see the testimony of TNMP witness Christopher Gerety on Page 14 lines 7-8, "TNMP installs hardened infrastructure when a project is required to address load growth or capital maintenance to replace end of life assets." Infrastructure in scope of TNMP's SRP that meets the above criteria are not targeted for replacement in TNMP's SRP. Infrastructure in scope of TNMP's SRP that do not meet the criteria above are targeted for replacement in TNMP's SRP. The projects in scope of TNMP's SRP and reported on in TNMP's filing in docket 38068 pursuant to 16 TAC § 25.94 on April 30, 2024 are projects required to address load growth or capital maintenance to replace end of life assets and would not be targeted for replacement in TNMP's SRP.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-17.** Please reference the direct testimony of Jason D. De Stigter at 23:27–31 where he states “[t]he enhanced communications (Program 3) will support physical and cybersecurity and even allow for improved outage tracking if meters are used for outage recording.” Please document and quantify how Program 3 will improve outage tracking for customers.

Prepared by: Jason De Stigter

Sponsored by: Jason De Stigter

**RESPONSE:** TNMP does not currently have communication with all its Distribution Automation devices. Additionally, for the devices that TNMP can communicate with, the Company currently leverages a combination of public common carrier leased Long-Term Evolution (“LTE”) services and unlicensed mesh radio technology that performs without controllable performance predictability during resiliency events. Due to the lack of communication abilities with some devices, and the unpredictability of the existing communications platform, TNMP does not always have secure and reliable communications with its Distribution Automation devices during resiliency events. This issue makes it challenging to identify which circuit segments of its system are truly impacted by resiliency events, and therefore makes it challenging to provide accurate expected times to restore for customers impacted by outage events. TNMP expects that the Program 3 communications network will facilitate more granular circuit segment operational insight for outage events. This insight will allow TNMP to provide more accurate expected times to restore for its customers.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-18.** Please describe any efforts—past, present, or planned for the future—to coordinate resiliency measures for extreme weather events in and around TNMP's service area with neighboring utilities, electric cooperatives, or municipally owned utilities. Please provide all communications and agreements with these entities regarding this coordination.

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**RESPONSE:** TNMP has not coordinated and has no current plan to coordinate resiliency measures for extreme weather events in the scope of its filed SRP with neighboring utilities electric cooperatives, or municipally owned utilities.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-19.** Please describe any efforts—past, present, or planned for the future—to coordinate resiliency measures for wildfires in and around TNMP's service areas with neighboring utilities, electric cooperatives, or municipally owned utilities. Please provide all communications and agreements with these entities regarding this coordination.

Prepared by: Christopher Gerety

Sponsored by:	Christopher Gerety
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**RESPONSE:** TNMP has not previously coordinated and has no current plan to coordinate resiliency measures for wildfires in the scope of its filed SRP with neighboring utilities electric cooperatives, or municipally owned utilities.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-20.** Please describe any efforts—past, present, or planned for the future—to coordinate resiliency measures for winter storms and cold weather events in and around TNMP's service areas with neighboring utilities, electric cooperatives, or municipally owned utilities. Please provide all communications and agreements with these entities regarding this coordination.

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**RESPONSE:** TNMP has not and has no current plan to coordinate resiliency measures for winter storms and cold weather events in the scope of its filed SRP with neighboring utilities electric cooperatives, or municipally owned utilities.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-21.** Please describe the corporate relationship between TNMP, TXNM Energy, and PNM Resources.

Prepared by: Stacy Whitehurst

Sponsored by: Stacy Whitehurst

**RESPONSE:** TXNM Energy is an energy holding company based in Albuquerque, N.M., with 2023 consolidated operating revenues of \$1.9 billion. Through its regulated utilities, PNM and TNMP, TXNM Energy provides electricity to more than 800,000 homes and businesses in New Mexico and Texas.

TXNM Energy, Inc. (NYSE: TXNM) completed its holding company name change, effective as of 5:00 pm ET on August 2, 2024. The common stock continues to be listed on the New York Stock Exchange under the ticker "TXNM", effective at the start of trading on August 5, 2024. TXNM Energy was previously named PNM Resources with common stock traded under the ticker "PNM." The CUSIP number for the common stock remains unchanged (69349H107).

There are no significant structural or organizational impacts to the company associated with the name change, and shareholders do not need to take any action. All outstanding shares of PNM Resources have become TXNM Energy shares. Coinciding with the change, TXNM Energy's website is now [www.txnmenergy.com](http://www.txnmenergy.com).



## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-22.** Please provide transcripts for the Q1, Q2, and Q3 2024 Earnings Calls for PNM Resources and TXNM Energy.

Prepared by: Stacy Whitehurst

Sponsored by: Stacy Whitehurst

**RESPONSE:** Transcripts for the Q1 and Q2 Earnings Calls for TXNM Energy are publicly available on TXNM Energy's website:

Q1- 2024 Earnings Call:

*<https://www.txnmenergy.com/~media/Files/P/PNM-Resources/quarterly-results/2024/Q1%202024%20Earnings%20Call%20Transcript.pdf>*

Q2-2024 Earnings Call:

*<https://www.txnmenergy.com/~media/Files/P/PNM-Resources/quarterly-results/2024/Q2%20Earnings%20Call%20Transcript.pdf>*

The Q3-2024 Earnings Call has not yet taken place.

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-23.** Please provide the Earnings Review Presentations for the Q1, Q2, and Q3 of 2024 Earnings Calls for PNM Resources and TXNM Energy.

Prepared by: Stacy Whitehurst

Sponsored by: Stacy Whitehurst

**RESPONSE:** The Earnings Review Presentations for the Q1 and Q2 Earnings Call for TXNM Energy are publicly available on TXNM Energy's website:  
*<https://www.txnmenergy.com/investors/financial-information/quarterly-reports/2024.aspx>*

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-24.** For the purposes of assessing the benefits of the SRP, please describe why TNMP chose to not use outside consultants for cybersecurity resilience and physical security resilience measures?

Prepared by: Gary Todd

Sponsored by: Sheila Mendez

**RESPONSE:** TNMP did not utilize an outside consultant to assess the benefits of the cybersecurity resiliency and physical security resiliency measures due to available internal expertise to perform qualitative assessments of resiliency benefits of the enhancements, which are intended to prevent or mitigate the effect of high impact, low frequency events.

## TNMP'S RESPONSE TO TEAM'S FIRST RFIS

<b>TEAM 1-25.</b>	Reference the SRP at 30 where TNMP states that over the prior five years, it spent "\$1.6B in capital on system hardening and modernization." Please identify any of these costs associated with system hardening and modernization efforts that have not been included in base rates, TCRF, DCRF, or other tariffed rate.
Prepared by:	Counsel
Sponsored by:	Counsel
<b>OBJECTION:</b>	<p>TNMP objects to this request because it seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence in this litigation. <i>In re State Farm Lloyds</i>, 2020 Tex. App. LEXIS 7207 at *16-17 (Tex. App. – Fort Worth [2d Dist.] 2020) (Finding that requested information was irrelevant and not discoverable where it “[did] not appear reasonably calculated to lead to the discovery of evidence that has a tendency to make a fact more probable or less probable than it would be without the evidence.”) Specifically, the referenced \$1.6B expenditure by TNMP mentioned in its SRP related to hardening and modernization efforts to TNMP’s <i>transmission</i> system. TNMP’s SRP does not propose measures to harden or modernize its transmission system, but rather presents measures that will harden and modernize TNMP’s <i>distribution</i> system. Accordingly, TNMP’s \$1.6B expenditure over the past five years is not relevant to the measures proposed in TNMP’s SRP. Moreover, whether TNMP was able to recover these hardening and modernization costs in its base rates, TCRF, DCRF, or other rates is not relevant because the Measures proposed in the SRP are separate and distinct from TNMP’s existing activities. Any allowance or disallowance of prior costs incurred has no bearing on whether TNMP’s SRP Measures are in the public interest and thus would provide TEAM with no information that can be used to evaluate TNMP’s proposed SRP.</p>

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-26.** How does TNMP intend to model system resiliency events once a resiliency plan is implemented?

(a) What inputs will be used in that model?

(b) What outputs will be produced by that model?

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**RESPONSE:** TNMP has not yet contemplated the manner in which it will model system resiliency events once its three year resiliency plan is completed.

## TNMP'S RESPONSE TO TEAM'S FIRST RFIS

### TEAM 1-27.

Please provide all reporting metrics and the proposed report timing for resiliency events and performance once a resiliency plan is implemented for the following areas:

- (a) System restoration duration
- (b) Wildfires
- (c) Extreme weather events and effects
- (d) Cybersecurity events
- (e) Physical security events

Prepared by: Jason De Stigter, Christopher Gerety, Gary Todd

Sponsored by: Jason De Stigter, Christopher Gerety, Sheila Mendez

RESPONSE: Please see the chart below with proposed dates for each metric.

<b>Metric</b>	<b>Proposed Reporting Date</b>
Hardened Distribution Pole Failure Rate	May 1, 2026
Hardened Substation Structure Flooding Rate	May 1, 2026
Rolling 10-Year Average SAIDI	May 1, 2026
Lower Performing Area Count	May 1, 2026
Average Hardened Protection Zone ("AHPZ") CI vs Average Protection Zone ("APZ") CI Comparison by County (Hardened Only)	May 1, 2028, see TIEC 1-16
AHPZ CI vs APZ CI Comparison by County (Vegetation Only)	May 1, 2028, see TIEC 1-16
AHPZ CI vs APZ CI Comparison by County (Hardened and Vegetation)	May 1, 2028, see TIEC 1-16
AHPZ CI Percentage Improvement (Hardened and Vegetation)	May 1, 2028, see TIEC 1-16
Rolling 10-Year Average Vegetation-Related SAIDI	May 1, 2026
Rolling 10-Year Average Vegetation-Related SAIFI	May 1, 2026
Preventable Vegetation-Related Outage Events	May 1, 2026
Vegetation-Related Ignitions	May 1, 2026

## TNMP'S RESPONSE TO TEAM'S FIRST RFIS

<b>Vegetation Program Line Miles Completed</b>	May 1, 2026
<b>Vegetation Program Cycle Percent Completion</b>	May 1, 2026
<b>Ignitions and Thermal Events Involving TNMP Facilities</b>	May 1, 2026
<b>Wire-Down Events</b>	May 1, 2026
<b>Enhanced Operations System Technology Program 1 Schedule Adherence</b>	May 1, 2026
<b>Enhanced Operations System Technology Program 2 Schedule Adherence</b>	May 1, 2026
<b>Enhanced Operations System Technology Program 3 Schedule Adherence</b>	May 1, 2026
<b>End Point Cutover</b>	May 1, 2026
<b>Increase in End Points</b>	May 1, 2026
<b>Enhanced Operations System Technology Program 4 Schedule Adherence</b>	May 1, 2026
<b>Number of Alerts</b>	May 1, 2026
<b>System Transparency (Number of Systems Monitored)</b>	May 1, 2026
<b>Incident Response Time</b>	May 1, 2026
<b>Number of Alerts Responded To</b>	May 1, 2026
<b>Volume of Recorded Malicious Behavior</b>	May 1, 2026
<b>Number of Data Sources Migrated to SOC</b>	May 1, 2026
<b>Enhanced Electronic Access Control</b>	May 1, 2026
<b>Enhanced Network Baselining and Monitoring</b>	May 1, 2026
<b>Enhanced Security Event Monitoring</b>	May 1, 2026
<b>Enhanced Configuration Monitoring</b>	May 1, 2026
<b>Hardened Substation Breaches vs. Non-Hardened Substation Breaches</b>	May 1, 2026

## **TNMP'S RESPONSE TO TEAM'S FIRST RFIS**

**TEAM 1-28.** Please refer to the proposed metrics labeled as “Attachment 1 - Oncor SRP Measure Programs Summary” in the Proposed Order filed on September 27, 2024 in Oncor’s Resiliency Plan in Docket No. 56545. Please identify any of these metrics that would not be reasonable to apply to TNMP’s Resiliency Plan and provide an explanation as to why they should be inapplicable. Please provide any documents supporting this analysis.

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**AGREEMENT:** TEAM restates TEAM 1-28 as follows:

Please refer to the proposed metrics labeled as “Attachment 1 – Oncor SRP Measure Programs Summary” in the Proposed Order filed on September 27, 2024 in Oncor’s Resiliency Plan in Docket No. 56545

(a) Would TNMP be willing to use Oncor’s proposed metrics in lieu of or in addition to its proposed metrics. If not, why not?

(b) Would TNMP be willing to include a metric that measures customer interruption minutes, restoration costs, and average restoration time? If not, why not?

**RESPONSE:**

(a) It would not be feasible to state, at this time, whether TNMP would be willing to include all the metrics in Oncor’s proposed order without further analysis of those metrics and requirements for any preexisting capabilities. However, for proposed metrics that could apply to TNMP’s specific programs, TNMP is willing to consider the addition of certain metrics, even though not required by statute or rule.

(b) Customer interruption minutes are included in certain proposed metrics in TNMP’s SRP. Please refer to TNMP’s response to TEAM 1-27.



## TNMP'S RESPONSE TO TEAM'S FIRST RFIS

**TEAM 1-29.** Reference the SRP at 184, where TNMP states that in 2023, “22 circuits accounted for over half of the customers impacted by vegetation-related outages. These circuits will be prioritized for maintenance and continued scrutiny.” Please identify the maintenance or repairs completed for each of these 22 circuits in 2023 and 2024, documents or summaries of this work, and the associated cost.

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

**RESPONSE:** This is an unclear request. TNMP interprets it with respect to vegetation management performed on the aforementioned circuits with regard to their performance in 2023. The circuit performance was identified after year-end 2023, which would be incorporated into work plan beginning in 2024. The below table includes relevant planned work for 2024 and the corresponding cost. Note that additional work may have been performed on these 22 circuits not identified in this table, such as a result of a customer work orders or emergent work. Actual work and costs for the 2024 period will be available after year-end 2024.

Substation	Circuit No.	Year Pruned	Cost
Brazoria	1271	2024	\$1,054,956.79
Friendswood	1252	2024	\$330,000.00
Alvin	1231	2024	\$390,000.00
Brazoria	1270	2024	\$658,724.10
Dickinson	1267	2024	\$540,000.00
West	1221	2024	\$76,501.54
Alvin	1115	2023	\$21,207.00