
23-00268-UT; Order Issuing Statement of Policy and Guiding Principles for Regional Market Participation

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BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF AN INQUIRY AND)
POTENTIAL RULEMAKING PERTAINING) Docket No. 23-00268-UT
TO INVESTOR-OWNED ELECTRIC)
UTILITIES' REGIONAL MARKET ACTIVITY)

ORDER ISSUING STATEMENT OF POLICY AND GUIDING PRINCIPLES FOR
REGIONAL MARKET PARTICIPATION

THIS MATTER comes before the New Mexico Public Regulation Commission (the “Commission”) upon its own motion, and the record established through a series of inquiries and workshops held to discuss potential participation by Public Service Company of New Mexico (“PNM”) and El Paso Electric Company (“EPE”) in regional electric markets.

In the attached statement of policy, the Commission provides guiding principles and outlines considerations that it believes are significant when assessing the decision to join a regional day-ahead market.¹ The Commission appreciates the participation and input provided by industry and stakeholders throughout this proceeding.

PROCEDURAL HISTORY

1. The Commission discussed the potential for an inquiry concerning the establishment of regional electric market activity guiding principles during the Commission’s Open Meeting held on July 27, 2023 (“July 2023 Open Meeting”). The Commission discussed that New Mexico’s ratepayers could benefit economically from a regional market that optimizes economic dispatch and maximizes the use of the electric grid and available generation. The Commission noted that regional markets could also help meet New Mexico’s emissions reduction

¹ A statement of policy should not be construed as a rule or regulation. *See* 17.1.120.7(B) NMAC. This attached Statement of Policy and Guiding Principles for Regional Market Participation document is intended to bring forth considerations --- drawn from a stakeholder process --- that utilities may consider when contemplating market participation. This guidance is not intended to, and does not, create any requirements or rights. This document does not substitute for, amend, or supersede any statute, regulation, or pertinent order of federal or state agencies. This document imposes no new legal obligation and grants no additional rights.

targets and improve grid reliability at a reduced cost to ratepayers as compared to transacting through the bilateral energy market. The Commission expressed a need to open a docket and host a series of workshops to build a foundation upon which to establish the guiding principles and expectations that New Mexico ratepayers, regulators, stakeholders, and utilities should have from exploring and ultimately participating in a regional day-ahead market or Regional Transmission Organization (“RTO”) or Independent System Operator (“ISO”).²

2. The Commission opened an inquiry and commenced this proceeding in an order issued on August 10, 2023.³ The Regional Markets Inquiry noted that electric utilities, the California Independent System Operator Corporation (“CAISO”), the Southwest Power Pool (“SPP”), state regulators, and electric industry stakeholders in the Western U.S. are developing regional day-ahead markets and discussing the potential for a West-wide RTO/ISO. The Regional Markets Inquiry recognized that, given the potential benefits to New Mexico ratepayers, PNM and EPE may participate in a regional market. Therefore, as discussed at the Commission’s July 2023 Open Meeting, the Commission deemed it prudent to solicit input from the industry and stakeholders in New Mexico to discuss and develop the guiding principles and expectations for electric utilities participating in such markets.

3. The Regional Markets Inquiry requested written responses to various questions and scheduled an initial workshop to discuss the responses. The inquiry addressed the following topics: ongoing initiatives concerning regional markets, ratepayer benefits, greenhouse gas emissions (“GHG”) accounting, market transparency and performance, market governance, independent

² This order summarizes relevant procedural history. The full electronic record of this proceeding is available at <https://edocket.prc.nm.gov>.

³ See Initial Order Opening Docket, Scheduling Workshop, and Requiring Filing of Responses to Inquiries (“Regional Markets Inquiry”) (Aug.10,2023).

monitoring, seams, reliability, stakeholder engagement processes, integrated resource planning (“IRP”) and resource adequacy, electric cooperative utility participation, transmission capability, and competitive generation.⁴ These topics and others were discussed in written comments and during the workshops and such input is summarized below.

PURPOSE OF INQUIRY AND WORKSHOPS

4. Electric wholesale markets have existed in the United States since the promulgation of Federal Energy Regulatory Commission’s Order Nos. 888⁵ and 2000.⁶ Today, seven RTOs/ISOs serve two-thirds of the population of the United States.⁷ Two of those RTOs and ISOs are relevant to this guidance paper: SPP, which operates in the Eastern Interconnection, and CAISO, which is the only RTO/ISO in the Western Interconnection. SPP and CAISO operate “full” RTO/ISO wholesale electricity markets. Eastern New Mexicans are served through the SPP’s market through Southwest Public Service Company’s (“SPS”), Lea County Electric Cooperative, Inc., and Western Farmers Cooperatives’ membership and participation in SPP. Beyond that, New Mexico utilities largely serve customers through participation in traditional bilateral wholesale electric markets.⁸

5. RTO and ISO market options in the Western Interconnection beyond California have been proposed and discussed by Western entities for years. However, the West has proceeded with caution partially due to lingering concerns about the California Energy Crisis in 2000-2001. Trust and confidence in regional markets has grown in recent years largely due to the success of

⁴ Regional Markets Inquiry at Appendix A.

⁵ Order No. 888, 75 F.E.R.C. ¶ 61,080 (1996).

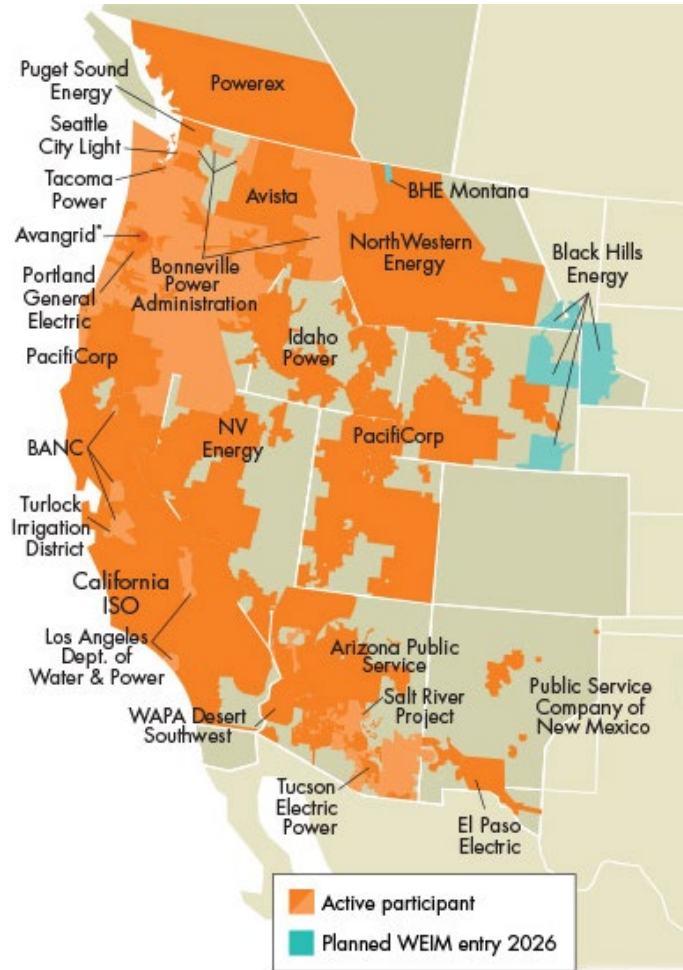
⁶ Order No. 2000, 89 F.E.R.C. ¶ 61,285 (1999).

⁷ Federal Energy Regulatory Commission ([“FERC”](#)) [Energy Primer](#) at 66.

⁸ As discussed below, the PNM and EPE balancing authority areas participate in the WEIM for real-time market purchases.

the WEIM.⁹ The WEIM allows utilities to efficiently manage imbalances between generation and load within existing transmission and reliability constraints. The WEIM serves 80% of the real-time/imbalance demand in eleven Western states. CAISO estimates that, since 2014, the WEIM has resulted in 925,568 metric tons of CO2 avoided curtailments.¹⁰

CAISO Western Energy Imbalance Market¹¹



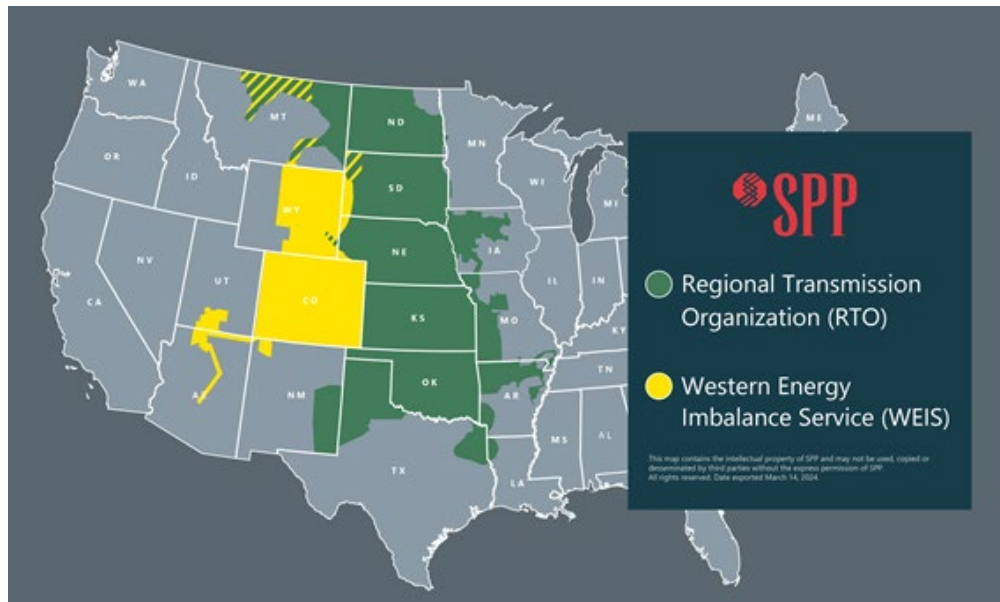
⁹ The Western Energy Imbalance Market (“WEIM”) is a voluntary “real-time” market that provides sub-hourly economic dispatch of resources for balancing supply and demand every five minutes. CAISO May 17, 2024 Presentation to the NMPRC (“CAISO Presentation”) at 2.

¹⁰ CAISO Presentation at 2.

¹¹ <https://www.westerneim.com/Pages/About/default.aspx>, retrieved October 19, 2024.

6. In 2021, SPP began administering its own real-time market in the Western Interconnection named the Western Energy Imbalance Service market (“WEIS”). The WEIS is comprised of several utilities in the Rocky Mountain Region, including Farmington Electric Utility System and Tri-State Generation and Transmission Association.

SPP Western Energy Imbalance Service¹²



7. PNM and EPE both participate in the WEIM. During the May 2024 Workshop, CAISO reported that PNM’s customers have received an economic benefit of approximately \$99 million and that EPE’s customers have received an economic benefit of approximately \$19 million since joining in 2021 and 2023, respectively.¹³

8. Seeking to build on the success of the WEIM and WEIS, Western utilities, regulators, interest groups, market participants, and other stakeholders have been developing day-ahead markets as incremental additions to CAISO and SPP’s respective Western real-time markets. These developing markets are the CAISO’s Extended Day-Ahead Market (“EDAM”) and SPP’s

¹² <https://spp.org/western-services/weis/>, retrieved October 19, 2024.

¹³ CAISO Presentation at 2.

Markets+. EDAM and Markets+ build on the WEIM and WEIS, respectively, by allowing for optimized commitment of generation in the day ahead timeframe to serve next day forecasted load. The potential benefits of these markets are discussed in the Ratepayer Benefits section below.

9. Given the likelihood of PNM and EPE participating in a day-ahead market and considering that regional markets could help meet New Mexico’s emissions reduction targets and improve grid reliability at a reduced cost to ratepayers compared to the status quo, the Commission deemed it prudent to facilitate a conversation between industry, stakeholders, and the Commission, to develop guiding principles that the Commission encourages PNM and EPE to consider when joining a regional day-ahead market. A summary of the record is explained below.

STAKEHOLDER INPUT

10. Ten parties responded to the Commission’s questions in the Regional Markets Inquiry, including PNM, EPE, SPS, SPP, Western Resource Advocates (“WRA”), Interwest Energy Alliance (“Interwest”), Clean Energy Buyers Association (“CEBA”), New Mexico Affordable Reliable Energy Alliance and Special Participant Greater Kudu, LLC (“NM AREA”), New Mexico Renewable Energy Transmission Authority (“RETA”), and Advanced Energy United.

11. The workshop held on September 21, 2023, included presentations by SPS, PNM, EPE, Interwest, and WRA.

12. On December 18, 2023, WRA submitted a presentation titled “State Authority Over Regulated Utilities’ Participation in an RTO/ISO.”¹⁴

¹⁴ The presentation discusses New Mexico, Nevada, Arizona, Utah, and Colorado legal authorities and relevant history to approve or control a utilities’ entry into an RTO/ISO.

13. The workshop held on January 25, 2024 (“January 2024 Workshop”), included presentations by PNM, EPE, and Energy and Environmental Economics Consulting (“E3”) on the Western Market Exploratory Group Cost Benefit Study (“WMEG Study”).

14. On February 9, 2024, Advanced Energy United, CEBA, Ceres, and WRA jointly submitted a letter (“Joint Letter”) to the Commission noting their support for improved regionalization in the Western interconnection and discussing the WMEG Study.

15. The workshop held on May 17, 2024, included presentations by CAISO and SPP.

16. On July 2, 2024, WRA submitted recommended market evaluation criteria in providing guidance to New Mexico utilities on the necessary information for evaluation of day-ahead market or RTO/ISO entry (“WRA Recommended Guiding Principles”).

17. The workshop held on August 29, 2024 (“August 2024 Workshop”), included presentations by the Western Power Pool on the Western Resource Adequacy Program (“WRAP”), the West-Wide Governance Pathways Initiative (“Pathways Initiative”), The Brattle Group (“Brattle”), PNM, and EPE.

18. On October 2, 2024, PNM submitted a response to the WRA Recommended Guiding Principles.

19. On October 9, 2024, EPE submitted a response to the WRA Recommended Guiding Principles.

a. Ratepayer Benefits

20. The Regional Markets Inquiry asked utilities and stakeholders to opine on how ratepayers would be affected by PNM and EPE’s further participation in regional electric markets. Specifically, the Regional Markets Inquiry asked respondents to discuss how cost savings to ratepayers are measured in regional markets, whether a regional market would increase system

reliability and reduce price volatility, how ratepayers may be affected by an electric utility's participation in a day-ahead regional market, and how utilities should report an analysis of a market's performance.

21. Commenters agree that participation in a regional wholesale electric market should result in cost savings to ratepayers through reduced wholesale energy costs and deferred capacity investments.¹⁵ Several commenters referenced the State-Led Market Study,¹⁶ which determined that savings resulting from cooperation in the West will amplify as the market size increases: from \$47 million per year with a real-time and day-ahead market; to \$747 million of benefits in a unified West-wide real-time and day-ahead market; to \$1.3 billion of benefits with a full RTO.¹⁷ Advanced Energy United highlights that the State-Led Market Study concluded that a single Western day-ahead market could result in energy and capacity savings for New Mexico of up to \$38 million and a full RTO of up to \$113 million per year by 2030.¹⁸ WRA agrees that wholesale energy cost reductions should result in lower costs to customers, and notes that savings depend on the regulatory rate structure employed.¹⁹ PNM states that between April 2021 and September 2023, PNM's customers saw a "benefit of approximately \$77 million" from PNM's participation in the WEIM.²⁰ Moreover, Interwest notes that a February 2023 study prepared by the National

¹⁵ WRA's Response to Commission Initial Order and Response to Inquiries ("WRA Comments") at 8; CEBA's Comments at 2.

¹⁶ State-Led Market Study, "Exploring Western Organized Market Configurations: A Western States' Study of Coordinated Market Option to Advance State Energy Policies Technical Report," Energy Strategies (Jul. 30, 2021).

¹⁷ Interwest Energy Alliance's Responses to the Commission's Initial Order Opening Docket, Scheduling Workshop, and Requiring Filing of Responses to Inquiries ("Interwest Comments") at 11-12.

¹⁸ Comments of Advanced Energy United to the Initial Order ("Advanced Energy United Comments") at 2-3.

¹⁹ WRA Comments at 8.

²⁰ Public Service Company of New Mexico's Response to Commission Order Opening Docket, Scheduling Workshop, and Requiring Filing of Responses to Inquiries ("PNM Comments") at 2. During the May 2024 Workshop, CAISO reported more recent data explaining that PNM's customers have received an economic benefit of approximately \$99 million and that EPE's customers have received an economic benefit of approximately \$19 million since joining the WEIM in 2021 and 2023, respectively.

Renewable Energy Laboratory found that regional cooperation led to significant savings in resource adequacy costs, leading to more affordable improvements in reliability.²¹

22. NM AREA states that, if properly designed, the development of an organized regional market has the potential to provide many significant benefits, including, but not limited to, lower costs from improved regional coordination of generator dispatch, more optimal investment in market infrastructure, enhanced reliability and integration services, greater resiliency of the regional grid, and reduced emissions from a more efficient dispatch of energy including from intermittent renewable resources.²² Advanced Energy United similarly asserts that regional markets subject to appropriate market power monitoring and mitigation increase competition among generation sources, which will result in lower prices for New Mexico consumers, businesses, and industry. Advanced Energy United adds that, depending on market products and rules, these markets also increase economic opportunity for New Mexico generators and distributed energy resources.²³

23. PNM, SPP, and CEBA agree that utility participation in regional markets will benefit ratepayers by enhancing reliability if regions can share and balance diverse resources across the most expansive area possible.²⁴ According to PNM, the ability to share in resource diversity in a shorter time granularity results in a more stable energy supply. WRA agrees that a regional market enhances reliability by reducing the need for reserves, promoting energy sharing, and lowering wholesale prices.²⁵

²¹ Interwest Comments at 4.

²² New Mexico Affordable Reliable Energy Alliance’s Initial Comments (“NM AREA Comments”) at 1.

²³ Advanced Energy United Comments at 8.

²⁴ PNM Comments, Exhibit A at 7; Initial Comments of Southwest Power Pool, Inc. (“SPP Comments”) at 12; CEBA Comments at 8.

²⁵ WRA Comments at 8.

24. CEBA states that an organized market's larger scale of operations can attract a more diverse range of resources, reduce the overall need for capacity reserves to address the growing concern about unexpected disruptions or meeting peak demand, lower transmission charges of neighboring systems, and conduct more effective system-wide planning, including new transmission that can help improve grid reliability.²⁶

25. Several respondents state that a regional market can reduce price volatility. For instance, CEBA explains that, through efficient use of the transmission system to serve load at least cost, market participants can use financial transmission rights to hedge against potential losses related to the price risk of delivering energy to the grid, thus reducing price volatility.²⁷ EPE and SPS note, however, that price volatility will still be influenced by factors such as transmission congestion and extreme weather.²⁸

26. PNM, SPS, and Interwest agree that a regional market offers additional benefits, including the use of more economical resources for regulation and emissions reductions from running more efficient resources and improved operability of renewable resources.²⁹ EPE points out that ratepayers may also face certain costs related to market participation, including membership and transaction fees, compliance costs, and technology integration expenses. Several commenters note that participation in a full RTO/ISO would increase benefits to customers significantly more than a day-ahead market; this is discussed further in the "Regional Transmission Organization" section.

²⁶ CEBA Comments at 8.

²⁷ *Id.* at 9.

²⁸ Southwestern Public Service Company's Response to Inquiries ("SPS Comments") at 3; El Paso Electric's Responses to Inquiries ("EPE Comments") at 6.

²⁹ PNM Comments, Exhibit A at 7; SPS Comments at 2; Interwest Comments at 13.

27. Regarding how to measure benefits to ratepayers, PNM states that benefits could be measured through production cost reductions and a reduction in planning reserve margins.³⁰ For example, PNM states that benefits are typically measured by comparing the total costs of electricity generation, transmission, and distribution resulting from the regional market settlement process to what those costs would have been had the utility used only its resources and manual bilateral trades to serve its customers.³¹ EPE similarly states that savings are typically calculated by comparing what customers would have paid under regional market conditions to a baseline scenario, reflecting the costs they would have incurred without market participation.³² WRA states that cost savings should account for the avoidance of additional expenses incurred from real-time or spot-market energy purchases, which can be mitigated through a day-ahead market with a larger resource pool.³³ Interwest and SPP reference reports like SPP’s “Value of Transmission” and “Benefit of the Market” and CAISO’s WEIM Quarterly Report as tools to measure savings realized in electric markets.³⁴

28. In response to the Commission’s inquiry about how often utilities should report an analysis of the market’s performance, several parties note that CAISO and SPP regularly report on their respective imbalance market benefits.³⁵ PNM also notes that SPS submits an annual report of its participation in SPP to the Commission.³⁶ WRA explains that it is vital and in the public interest for New Mexico-regulated utilities to be transparent about their deliberations and ultimate value proposition that will influence the decision to join a day-ahead energy market. WRA

³⁰ PNM Comments, Exhibit A at 7.

³¹ *Id.*

³² EPE Comments at 7.

³³ WRA Comments at 8.

³⁴ Interwest Comments at 4; SPP Comments at 11.

³⁵ Interwest Comments at 17; PNM Comments, Exhibit A at 19; SPS Comments at 3.

³⁶ PNM Comments, Exhibit A at 8.

recommends that post-commitment, utilities should provide the Commission a quarterly update regarding overall performance with market participation and related impacts on transmission usage, resource mix and related dispatch efficiencies, seams management, degree of reductions in renewable energy curtailment, and GHG emissions reporting.³⁷

b. Reliability and Resource Adequacy

29. The Regional Markets Inquiry asked how reliability standards, such as the utility's reserve margin, are established and whether a utility's responsibility for local reliability would change under a regional market. The Commission also asked participants to explain whether aspects of system reliability would improve because of participation in a regional market and how reliability benefits should be measured. Finally, the Commission asked industry and stakeholders to discuss the effect on integrated resource planning (IRP) and resource adequacy from joining a regional market.

30. Several parties explain that reliability standards are set by FERC or the North American Electric Reliability Corporation ("NERC").³⁸ Regarding whether a utility's responsibility for local reliability changes if they participate in a regional market, most respondents, including EPE, Interwest, PNM, SPS, and WRA answered no, the responsibility would not change.³⁹ SPP states that the individual transmission owners in SPP are obligated under the NERC reliability standards and SPP planning criteria to resolve reliability violations and compliance needs identified by SPP or by the individual transmission owners.⁴⁰ SPP further

³⁷ WRA Comments at 10.

³⁸ EPE Comments at 20; WRA Comments at 31.

³⁹ *See, e.g.*, PNM Comments at 24.

⁴⁰ SPP Comments at 24.

explains that if there are local reliability responsibilities of a utility, these obligations are not changed by the SPP regional planning criteria's obligations.⁴¹

31. Regarding a utility's reserve margin, WRA asserts a utility's reserve margin is not set directly by any regional market operator. Still, under a well-designed and functional RTO, resource coordination can influence a utility's setting of its reserve margin for resource adequacy.⁴² For example, SPS states that in SPP, reliability standards such as the planning reserve margin are established and provided for in FERC-approved tariffs. SPS explains that the tariffs and any changes go through the SPP stakeholder process and are approved by the SPP Board of Directors. SPS notes that SPP increased the planning reserve margin requirement from 12% to 15%, effective Summer 2023.⁴³

32. Regarding the impact of a regional market on the IRP process, EPE states that the impact heavily depends on the scope of the market rules. For example, EPE asserts that an RTO/ISO market that includes a resource adequacy obligation or a centralized capacity market would have significant implications for the IRP process.⁴⁴ EPE explains that in such a market, the procurement target and counting rules for capacity resources are crucial components to IRP, potentially overriding previously locally controlled standards.⁴⁵

33. During the August 2024 Workshop, Western Power Pool described its WRAP. Western Power Pool states that the WRAP is a voluntary program for utilities across the Western Interconnection to meet their resource adequacy needs. Western Power Pool states that the WRAP includes a "binding forward showing" process that requires participants to demonstrate that they

⁴¹ *Id.*

⁴² WRA Comments at 31.

⁴³ SPS Comments at 12.

⁴⁴ EPE Comments at 23.

⁴⁵ *Id.*

have secured their share of the regional capacity need for the upcoming season using common planning and capacity accreditation metrics. Western Power Pool further explains that the forward showing is supplemented by a binding operational program that obligates participants with surplus to assist participants with a deficit in the hours of highest need using bilateral trading mechanisms.⁴⁶ Western Power Pool states that the WRAP establishes a regional reliability metric of a seasonal 1 event-day in 10 years loss of load expectation, and that non-compliance with the forward showing would result in a deficiency charge for the participant that is short on capacity.⁴⁷ Western Power Pool explains that both EDAM and Markets+ are capable of accommodating WRAP.⁴⁸ SPP explains that participation in WRAP will be required for all load serving entities in Markets+ as part of the market's design to achieve uniform resource adequacy requirements.⁴⁹ PNM is a member of WRAP,⁵⁰ while EPE has not decided to join WRAP.

34. EPE explains that the current discussion of using the WRAP as a basis for market participation would have some impacts on IRP in the sense that it implements a forward procurement target and capacity counting rules.⁵¹ EPE adds that EDAM's proposed approach of daily sufficiency evaluations may have minor impacts on IRP in the sense that the proposed bidding and flexibility counting rules may have some influence on IRP decisions.⁵² However, there are no capacity auction market designs under consideration in the West. According to PNM, under EDAM and Markets+ all utilities will continue to plan for and address resource adequacy through their IRP process and state Commission approvals, and day-ahead market participation will not

⁴⁶ Western Power Pool August 29, 2024 Presentation to the NMPRC (“Western Power Pool Presentation”) at Slide 6.

⁴⁷ *Id.* at Slide 7.

⁴⁸ *Id.* at Slide 9.

⁴⁹ SPP May 17, 2024 Presentation to the NMPRC (“SPP Presentation”) at 15.

⁵⁰ PNM Comments at 28.

⁵¹ EPE Comments at 23.

⁵² *Id.* at 22-23.

directly support the utility's ability to procure sufficient resource adequacy capacity. PNM adds that WRAP helps support and ensure entities have sufficiently planned for and provided a targeted standard of reserve margin and resource adequacy.⁵³

35. WRA and Advanced Energy United present an additional nuanced perspective. WRA states that participating in a regional market for energy (day-ahead or a fully organized RTO) can help reduce the utility's dependence on its own resources for resource adequacy – which the utility should not conduct in isolation but rather develop with regional market participants.⁵⁴ Advanced Energy United provides similar comments, noting that the costs of market purchases are likely to be reduced as the utility has greater access to low-cost resources in the day-ahead market.⁵⁵

36. Reliability benefits are covered to some extent in the Ratepayer Benefits section above. As noted, several commenters explained that a geographically diverse market footprint will benefit customers with respect to reliability by providing access to a broader range of resources.⁵⁶ Interwest explains that frictionless connection to power generated in diverse geographic locations and by diverse resource types will help maintain reliability, even in the face of unpredictable weather or other catastrophic events.⁵⁷

37. To measure reliability benefits, EPE states “Measuring (or estimating) retail customer cost savings in a regional electricity market generally involves comparing the costs that customers would have incurred under the regional market conditions with the costs they would

⁵³ PNM Comments at 28.

⁵⁴ WRA Comments at 34.

⁵⁵ Advanced Energy United Comments at 6.

⁵⁶ Interwest Comments at 8; WRA Comments at 8; EPE Comments at 3.

⁵⁷ Interwest Comments at 33.

have incurred under an alternative scenario.”⁵⁸ SPP provides annual estimates of cost savings in their “Value of Transmission” and “State of the Market” reports.⁵⁹ PNM provided a list of potential reliability metrics including outage frequency and duration, voltage stability, and redundancy.⁶⁰ SPS suggested that estimates of these benefits be included in regular reports created by the RTO.⁶¹

c. Seams and Existing Available Transfer Capability

38. In the Regional Markets Inquiry, the Commission asked about the available transfer capability from PNM and EPE to potential markets in the Western and Eastern Interconnection. The Commission also asked stakeholders to describe the effect on seams if the utilities join either the EDAM or Markets+ and about other potential seams that should be considered.

39. WRA explains that seams occur between adjacent energy markets, such as between any two RTOs, balancing areas, or transmission owners, where the use of transmission may incur charges or usage rules that impact energy going from one to the other. WRA explains that seams generally create inefficiencies that increase costs to ratepayers or create operational problems.⁶²

40. PNM and EPE provide similar comments. EPE contends that more division among entities generally creates more market seams, which in turn creates more market hurdle rates.⁶³ PNM contends that initial new market seams can unintentionally create restrictions to automated optimized dispatches from leaving one market and entering another, which results from the need

⁵⁸ EPE Comments at 5.

⁵⁹ SPP Comments at 11. *See also*, <https://www.spp.org/value-of-transmission/> and <https://www.spp.org/spp-documents-filings/?id=18512>.

⁶⁰ PNM Comments, Exhibit A at 23.

⁶¹ SPS Comments at 12.

⁶² WRA Comments at 29.

⁶³ EPE Comments at 19.

for in-market resources and transmission asset data as inputs into optimized dispatch solutions.⁶⁴

WRA asserts that seams can also reduce reliability.⁶⁵

41. Concerning existing interconnectivity to the West, PNM states that interconnectivity with other WEIM-participating balancing authority areas currently provides PNM ties into and benefits from the WEIM. PNM states that its largest transmission connectivity is through Arizona Public Service Company (“APS”) and that the transmission corridor in the Four Corners region provides it the most connectivity in the WEIM.⁶⁶ PNM further notes that it has “very limited” transmission connectivity to Colorado, which is expected to be in the Markets+ footprint.⁶⁷

42. Like PNM, EPE explains it has commercial ties to WEIM. EPE notes that future ties to a Western regional market would likely be similar to locations for which WEIM energy transfer system resources have been defined. However, EPE notes that paths used in a market will depend on the specific footprint and rules of the market.⁶⁸

43. As it relates to ties to the Eastern interconnection, EPE notes it has one transmission tie with SPP at a boundary between the Western and Eastern Interconnections.⁶⁹ PNM explains that it owns and operates the Blackwater DC converter station, which ties PNM to the Eastern Interconnection through SPS and the SPP market. PNM states that, at 200 MW, the transmission capacity through Blackwater DC converter station is limited by both physical construction and

⁶⁴ PNM Comments at 21.

⁶⁵ WRA Comments at 29.

⁶⁶ PNM Comments, Exhibit A at 21.

⁶⁷ *Id.*

⁶⁸ EPE Comments at 19.

⁶⁹ *Id.*

2,000 MW of variable energy resources that have long-term firm transmission rights to the capacity along the Blackwater to Four Corners 345kV transmission path.⁷⁰

44. Regarding seams if PNM and EPE join the EDAM or Markets+, PNM, EPE, and Interwest state that the industry cannot know the locations of seams until market footprints are finalized.⁷¹ Interwest suggests that utilities should be required to analyze and discuss seams before joining a specific market. To that end, Interwest and CEBA⁷² recommended the Commission consider a standing seams committee to help reduce friction between markets. Advanced Energy United supports this suggestion, stating the Commission should ensure a “robust, efficient, and equitable seams management process.”⁷³

45. PNM suggests that market operators should create seams management tools, such as those in the Eastern interconnection, to reduce restrictions and inefficiencies. Advanced Energy United emphasizes the importance of dealing with seams quickly because “seams costs between markets are not a one-time thing, but are ongoing indefinitely.”⁷⁴ WRA provides an example of the cost of seams. WRA explains that the export of wind and solar energy from New Mexico to California and other states is a large economic opportunity; however, WRA asserts that under conditions of overgeneration of wind and solar in New Mexico, or for New Mexico wind and solar energy that is not reserved, seams can cause economic and operational barriers or thresholds that will reduce exports and cause more wind and solar energy to be curtailed.⁷⁵

⁷⁰ PNM Comments, Exhibit A at 21.

⁷¹ Interwest Comments at 31.

⁷² CEBA Comments at 15.

⁷³ Advanced Energy United Comments at 5.

⁷⁴ *Id.* at 3.

⁷⁵ WRA Comments at 30.

46. All commenters recognize that a larger footprint would create fewer seams and likely result in more significant benefits to ratepayers. For instance, PNM explains that it saw WEIM benefits increase when Tucson Electric Power Company and EPE became WEIM members, as further market transmission connectivity was unlocked.⁷⁶ Accordingly, PNM asserts that existing market transmission connectivity represents “the largest deciding factor in choosing a day-ahead market.”⁷⁷

47. The Commission recognizes that the industry can only identify seams between markets by knowing the market footprint and that seams will evolve as market participation and rules evolve. Nevertheless, it is prudent to evaluate how potential seams could impact ratepayers’ potential benefits before joining a market. To that end, the Commission requested information that examined available transfer capability under likely scenarios for EDAM and Markets+. This analysis is discussed further in the “WMEG Study” and “Brattle Study” sections below.

d. Greenhouse Gas Emissions Accounting

48. In the Regional Markets Inquiry, the Commission asked parties to expand on how joining a regional market will help New Mexico meet ETA carbon reduction goals, how emissions will be measured, and what data should be collected to ensure and enforce emissions compliance. There is a common understanding among parties that coordination of energy resources over a large geographic region, with dispatch prioritizing the lowest cost energy, can contribute to reliable grid decarbonization through increased integration of renewable resources.⁷⁸ PNM states that “a day-

⁷⁶ PNM Comments, Exhibit A at 21.

⁷⁷ PNM Comments, Exhibit A at 22.

⁷⁸ WRA Comments at 11; EPE Comments at 8.

ahead market or RTO won't necessarily help New Mexico meet its state-level GHG targets but would provide environmental regional benefit.”⁷⁹

49. CEBA points out that day-ahead markets, in comparison to bilateral or real-time markets, ranked higher in “providing transparent and timely information on pricing resource operations, and emissions, as well as economically facilitating emissions reduction goals via market signals.”⁸⁰ While there is agreement on increased diversity and resource integration, Interwest raises concerns of resource mix compatibility. Interwest cites a Brattle study that found a hypothetical situation where coal generation increased by 500 GWh while renewable generation remained roughly unchanged.⁸¹ To battle this issue, Interwest suggests that the Commission examine the compatibility of resources in New Mexico’s current portfolio with the resources in the proposed markets, and whether the resources would incentivize or disincentivize market participants to build additional renewables.⁸²

50. As for the measurement and tracking of GHG emissions, there is wide agreement that an ideal market will have a framework for tracking and reporting that complies with New Mexico’s reporting and reduction requirements.⁸³ Interwest emphasizes that reporting should also accurately represent the emissions that New Mexico is generating.⁸⁴ This is supported by WRA, which states that compliance should not result in emissions leakage, “which can occur when policies result in emissions shifting to another jurisdiction, rather than being reduced overall.”⁸⁵ According to PNM, the market design should have policies that require the accurate tracking of

⁷⁹ PNM Comments, Exhibit A at 8.

⁸⁰ CEBA Comments at 10-11.

⁸¹ Interwest Comments at 19.

⁸² *Id.*

⁸³ WRA’s Recommended Guiding Principles at 4-5

⁸⁴ Interwest Comment at 20.

⁸⁵ WRA’s Recommended Guiding Principles at 4-5.

resources from which power is bought and sold, the retention of documentation for purchase power agreements, and the tracking and reporting of GHG emissions for all power transactions.”⁸⁶ The steps WRA suggests to achieve this are ensuring that the market operator provides robust reporting on emissions associated with resources in the market (with the greatest granularity and frequency possible) and having the utilities provide regular updates on estimated and realized emissions associated with transfers through the market as well as any curtailment of renewable energy resources.⁸⁷ CEBA emphasizes the frequency and granularity requirement by saying data should be location and time-specific down to the hour.⁸⁸

51. In response to the WRA Recommended Guiding Principles concerning GHG emissions dispatch and tracking, PNM states that it does not believe that the information requested by WRA is available now. However, PNM states that it has been participating in the CAISO GHG Coordination Working Group and Markets+ GHG Task Force. PNM states that it supports the inclusion of policies described by WRA that reflect New Mexico’s policies on GHG emissions through those stakeholder processes.⁸⁹

e. Governance and Stakeholder Participation

52. The Regional Markets Inquiry asked utilities and stakeholders to opine on what it means to have an independent board under a regional market construct and why an independent board is important. The Commission also asked respondents to describe the governance structure of the regional markets currently being discussed and whether the governance structure preserves state authority to support state carbon reduction policies and allows meaningful participation by

⁸⁶ PNM Comments, Exhibit A at 10.

⁸⁷ WRA’s Recommended Guiding Principles at 4-5.

⁸⁸ CEBA Comments at 12.

⁸⁹ Public Service Company of New Mexico’s Responses to Western Resource Advocates’ July 1, 2024 Comments (“PNM Response”) at 2.

state representatives and stakeholder interests. The Regional Markets Inquiry additionally asked respondents to explain how decisions about market design are typically made and whether New Mexico stakeholders would have a meaningful opportunity to participate.

53. EPE states that having an independent board in a regional market means that individuals who are unaffiliated with any market participant, generator, or utility make the critical decisions about the market's operations.⁹⁰ Interwest and other commenters similarly note that FERC considers a board to be independent if the board's decision-making process is independent of individual market participants or classes of market participants.⁹¹ EPE adds that the board's independence is crucial to ensuring fairness, preventing conflicts of interest, and maintaining transparency in operations. EPE notes that independence allows decision-makers to focus on the broader interests of market participants, consumers, and the overall functioning of the market, which results in trust in the market and equitable results.⁹² Several commenters express the same idea about independence.⁹³

54. SPP explains that an RTO must have a well-defined governance process, with any entity having the right to participate and all members having voting rights on policies and the right to elect the independent board of directors. In SPP, for example, the Regional States Committee ("RSC") has express authority over some market design issues.⁹⁴

55. Various parties described the governance structure of the regional markets currently being developed: EDAM and Markets+, and SPP and CAISO presented the governance structure of their respective markets at the workshop held on May 17, 2024. WRA explains that "[b]oth

⁹⁰ EPE Comments at 14-15.

⁹¹ Interwest Comments at 25-26; SPS Comments at 8.

⁹² EPE Comments at 14-15.

⁹³ CEBA Comments at 14-15; PNM Comments, Exhibit A at 15.

⁹⁴ SPP Comments at 3, 12.

market options have a two Board governance structure. One Board is the Board that oversees the RTO, the CAISO Board of Governors and the SPP Inc. Board of Directors. The second Board oversees the market option (EDAM and Markets+) and is intended to represent Western stakeholders, the [WEM] Governing Body and the Markets+ Independent Panel (“MIP”).⁹⁵ WRA notes that decisions about the market design of EDAM and Markets+ ultimately go to the Governing Body and MIP respectively for approval before they can be filed with FERC.⁹⁶

56. In addition, WRA explains that, in both EDAM and Markets+, the RTO/ISO Board has some oversight responsibility over the market option including the market design, though the level of oversight is different in each market. It states that the California Board of Governors is appointed by the Governor of California and the SPP Board of Directors is appointed by SPP, Inc. members, primarily nominated by an SPP sector-based nominating committee. According to WRA, neither is ideal for representing West-wide interests.⁹⁷

57. Regarding EDAM, WRA states that under the CAISO “joint authority” model, the WEM Governing Body and CAISO Board meet, discuss and vote on proposed market design changes together. WRA states that the joint authority model requires an affirmative vote of a majority of both the WEM Governing Body and the CAISO Board of Governors before CAISO can file new tariff rules for approval at FERC over a specified set of market rules.

58. Regarding Markets+, WRA states that the MIP will have filing rights under Section 205 of the Federal Power Act. WRA explains that this means that, if a proposed market design change is approved by the MIP, it can be filed with FERC without going to the SPP Board for

⁹⁵ WRA Comments at 15.

⁹⁶ WRA Comments at 15.

⁹⁷ *Id.*

approval. However, the MIP must include one SPP Board member with full voting rights and any MIP action or inaction can be appealed to the SPP Board by a single member of the MIP.⁹⁸

59. PNM states it considers both the EDAM and Markets+ governance structures sufficient for participation in a day-ahead market.⁹⁹ However, PNM explains that it would favor governance reform from CAISO to move beyond EDAM participation. Currently, the selection of the CAISO Board of Governors is not independent of California state policy. Accordingly, PNM reasons that non-California members' decision-making rights and voting privileges may be insufficient for larger RTO participation. On this topic, the Pathways Initiative presented its plan to develop and form a new and independent entity that would build upon existing CAISO market structures and include an independent governance structure.¹⁰⁰ The Pathways Initiative explained that the goal is to create a regional organization that respects state authority to set procurement, environmental, reliability, and other public interest policies.¹⁰¹

60. Regarding the Commission's question about opportunities for stakeholder participation, several commenters highlight that how the market design proposals are developed is just as important as who has the decision-making authority. CEBA states that stakeholders should be able to track market issues, raise new concerns, and understand the basis upon which decisions are made.¹⁰² CEBA references organized wholesale market principles, providing that "Transparency improves decision-making processes for all stakeholders and should thus be

⁹⁸ *Id.* at 16-17.

⁹⁹ PNM Comments, Exhibit A at 15-16.

¹⁰⁰ Pathways Initiative August 29, 2024 Presentation to the NMPRC ("Pathways Presentation").

¹⁰¹ *Id.* at 5.

¹⁰² CEBA Comments at 13.

prioritized. Market participants, stakeholders, and interested parties should be provided the robust availability and access to data, key personnel, and decision-making processes (...).”¹⁰³

61. EPE explains that members in regional markets participate in market decisions and appeals through a structured governance and regulatory framework that ensures that market participants have a voice in shaping the rules, policies, and operational aspects of the market.¹⁰⁴ Additionally, EPE explains that all electric market operators must have their tariffs approved by FERC and the approval process includes the opportunity for public comment.¹⁰⁵

62. WRA provides four principles for inclusive stakeholder engagement and transparent decision-making. First, WRA states that decision-making at all levels of the stakeholder process should be as transparent as possible by providing meeting materials five days in advance of the meeting, making meetings open to the public, using executive sessions sparingly, voting on the record, and providing detailed meeting minutes and providing meeting recordings. Second, WRA states that minority positions must be recognized and considered throughout the stakeholder process. For example, WRA provides that minority positions should be communicated to the board with majority positions, stakeholders should have meaningful participation in working groups and committees (with voting and appeal rights), and there should be no unreasonable barriers to membership, such as dues that are too high for small organizations. Third, WRA states that the board of directors must be vetted through an open process to be diverse and independent, such that the board may consider the concerns of its membership without being beholden to market participants. Fourth, WRA states that state utility commissions and public interest organizations should have a major role in the market design, with state committees comprised of regulators from

¹⁰³ *Id.* at 14.

¹⁰⁴ EPE Comments at 12.

¹⁰⁵ *Id.*

participating states and sufficient authority to protect state interests with Federal Power Act Section 205 filing rights.¹⁰⁶

63. Regarding the stakeholder processes for EDAM and Markets+, PNM and EPE explain that the processes for market design for both day-ahead market offerings have been robust stakeholder processes.¹⁰⁷ PNM highlights that CAISO’s Body of State Regulators (“BOSR”) and SPP’s Markets+ State Committee (“MSC”) provide participation and engagement for state regulatory agencies. It adds that other formal stakeholder groups such as CAISO’s Regional Issue Forum and SPP’s Market Working Group are standing committees that have input into the design but also maintain input as market design changes arise over time.¹⁰⁸

f. Independent Market Monitor

64. The Regional Markets Inquiry asked respondents to describe the methods typically used in a regional market to ensure proper market power mitigation. EPE explains that regional markets implement various methods, including price caps and floors to prevent extreme price spikes and crashes, automated market power mitigation to limit the exercise of market power, rules to prevent participants from manipulating the market to their advantage, and after-the-fact review with potential referral to FERC for enforcement.¹⁰⁹ PNM explains that the most important element for market monitors is independence from the market operator and the market participants.¹¹⁰

65. Independent Market Monitors may be internal, external, or hybrid, per FERC rules. WRA explains that any day-ahead market or RTO entering the Western Interconnection will be new to the region and require the trust and confidence of market participants, regulators,

¹⁰⁶ WRA Comments at 2.

¹⁰⁷ PNM Comments, Exhibit A at 12; EPE Comments at 12.

¹⁰⁸ PNM Comments, Exhibit A at 12.

¹⁰⁹ EPE Comments at 17-18.

¹¹⁰ PNM Comments, Exhibit A at 18.

customers, and public interest advocates.¹¹¹ Accordingly, WRA recommends any day-ahead energy market that has never operated across the Western Interconnection to this date should adopt a hybrid market monitoring model for the first three years with clear roles for the internal and external monitors.¹¹²

66. WRA states that to ensure proper market mitigation is in place, the market monitor should measure the ability of suppliers to profitably raise the market price of energy over its marginal costs to mitigate horizontal and vertical market power. WRA recommends that the market monitor collect metrics and provide reports to the market board, state regulators, and the public. According to WRA, market monitors should evaluate and identify inefficiencies such as uneconomic energy dispatch, the ability of suppliers to profitably raise the market price of energy over its marginal costs, the utilization of transmission infrastructure in comparison to its physical and contractual operational limits, and interchange transfers associated with market seams, among other issues.¹¹³

67. EPE and PNM state that CAISO's Department of Market Monitoring and SPP's Market Monitoring Unit report directly to their governing boards. According to EPE, this reporting structure makes the market monitor independent from the market operators' management chain.¹¹⁴ Interwest explains that both CAISO and SPP will add market monitoring to EDAM and Markets+, respectively.¹¹⁵

¹¹¹ WRA Comments at 26.

¹¹² *Id.*

¹¹³ WRA Comments at 26-27.

¹¹⁴ EPE Comments at 17; PNM Comments, Exhibit A at 17.

¹¹⁵ Interwest Comments at 29.

g. Regional Transmission Organization

68. Several commenters note that participation in an RTO/ISO – as opposed to a day-ahead market – would significantly improve transmission planning and result in much higher benefits to ratepayers.¹¹⁶ Interwest notes that the consensus is that an RTO is the most cost-effective and beneficial solution for electricity planning in the West.¹¹⁷ Interwest and Advanced Energy United add that New Mexico and other Western states can capture far more benefits by developing and joining an RTO/ISO to increase reliability and decrease price volatility.¹¹⁸ To that end, Interwest states that it is supportive of all market developments, but any entrance into a day-ahead market option must only be considered as an incremental step on the path to a full RTO.

69. Advanced Energy United explains that it commissioned an economic benefits study that found a West-wide RTO would provide between 159,000 and 657,000 permanent jobs across the region, generate between \$18.8 billion and \$79.2 billion in additional gross regional product, and produce incremental tax contributions of \$619 million to \$2.4 billion annually. Advanced Energy United states that a regional market would incentivize between 567 and 1,647 MW of additional clean energy development in New Mexico by 2035. Advanced Energy United adds that the broadest possible energy market or RTO options also offer New Mexico entities a chance to avoid creating or exacerbating significant seams that would result in new costs and burdens that will be born for decades to come.¹¹⁹

70. RETA also supports New Mexico utilities joining an RTO. RETA states that there are limited transfer capabilities, and more large-scale paths would introduce a more integrated

¹¹⁶ SPS Comments at 17; PNM Comments, Exhibit A at 8.

¹¹⁷ Interwest Comments at 15; Advanced Energy United Comments at 4.

¹¹⁸ Interwest Comments at 15.

¹¹⁹ Advanced Energy United Comments at 2-3.

transmission network. RETA states that while day-ahead markets are a good beginning, these efforts must go further, particularly concerning transmission planning. According to RETA, a properly organized RTO will be able to plan and develop interconnection that minimizes the risk of blackouts due to lack of capacity.¹²⁰ Similarly, Advance Energy United asserts that “improved and more efficient planning and development of new transmission is the other great promise of an RTO/ISO.” Advanced Energy United notes that effective transmission planning will leverage and expand on a system that New Mexico ratepayers paid for and ensure that the grid continues modernizing to serve needs.¹²¹

71. CEBA notes that its large energy customers’ clean energy projects are primarily within ISO/RTO regions, covering two-thirds of U.S. electricity customers. CEBA states that large energy customers in the commercial and industrial sectors have contracted more than 71 GW of carbon-free energy since 2014, equivalent to more than 40% of clean capacity added to the grid during that time. CEBA references an economic impacts study conducted by Advance Energy United, which found that, through participation in a Western RTO, New Mexicans would save \$114 million in energy costs annually, grow the state economy by up to \$1.6 billion per year, create up to 18,800 permanent, good paying jobs, and generate new state and local revenue.¹²²

72. Advanced Energy United explains that the shift from contract-path transmission operation to a flow-based regime and centralized generation dispatch is expected to significantly increase the functional capacity and lower the cost of the transmission system overall. Advanced Energy United warns, however, that the degree of this effect will depend on the physical capability

¹²⁰ New Mexico Renewable Energy Transmission Authority’s Initial Comments in Support of New Mexico Utility and Electric Cooperative Participation in A Regional Day-Ahead Market or Regional Transmission Organization (“RETA’s Comments”) at 3-4.

¹²¹ Advanced Energy United Comments at 7.

¹²² CEBA Comments at 10.

of the existing transmission system and the fraction of the system that is made available to the operator. Advanced Energy United explains that an RTO/ISO with limited transfer capability to a New Mexico utility, or with that capability effectively tied up by contractual obligations, is of limited benefit. Accordingly, Advanced Energy United recommends that the Commission closely scrutinize market design proposals to ensure the market optimally uses New Mexico's grid.¹²³

h. Electric Cooperatives

73. The Regional Markets Inquiry asked how electric cooperatives could participate in a regional market. WRA explains that an electric cooperative may join a market or may be impacted by another utility's decision to join a market.¹²⁴ PNM states that the granularity for membership for the WEIM and a day-ahead market is at the balancing authority area level. According to PNM, load and generation within PNM's balancing area are included in the data that informs market dispatch. PNM states that, in an energy imbalance market like the WEIM, it is optional to register a resource or load as "participating." Thus, if the load or resource is not participating, the market still uses meter and telemetry data to inform the market solution, but bids are not submitted and, therefore, not optimized by the market. Conversely, PNM states that in a day-ahead market, all loads and resources are "participating" and that these loads and resources must have bids submitted by a scheduling coordinator. PNM explains that electric cooperatives, or any resource owner or load-serving entity, can become scheduling coordinators and interact directly with the market operator.¹²⁵

74. Interwest states that it is common for rural electric cooperatives to participate in regional markets. Interwest notes that many rural electric cooperatives are the Midcontinent

¹²³ Advanced Energy United Comments at 6-7.

¹²⁴ WRA Comments at 35-36.

¹²⁵ PNM Comments, Exhibit A at 29.

Independent System Operator members. Interwest explains that participation in a regional market can provide rural electric cooperatives increased access to generation resources as certain cooperatives may lack the capital to construct on their own. Interwest maintains that the opportunity to reap the benefits of cooperation through a regional market does not depend on a utility's ownership model.¹²⁶

i. Recommended Guiding Principles

75. WRA proposed recommended guiding principles and criteria for wholesale market evaluation and reporting. WRA states that the utility should conduct a pre-entry cost-benefit comparative analysis of markets and lists the type of information associated with market participation that the utilities should periodically make available to the Commission.¹²⁷ WRA also recommends several GHG reporting metrics that it believes are necessary for utilities to demonstrate compliance with decarbonization mandates.¹²⁸ WRA reiterates the importance of a transparent, independent governance structure with diverse stakeholder input and shares elements of the governance structure that the utilities should consider.¹²⁹ WRA maintains that New Mexico utilities should conduct a comparative analysis of multiple available day-ahead markets or RTO/ISOs before selecting one to maximize benefits to New Mexico and potential ways in which seams would be mitigated.¹³⁰ WRA recommends considerations for the evaluation of transmission expansion and cost allocation.¹³¹ Finally, WRA states that utilities must evaluate associated

¹²⁶ Interwest Comments at 38.

¹²⁷ WRA Recommended Guiding Principles at 3-4.

¹²⁸ *Id.* at 4-5.

¹²⁹ *Id.* at 5-7.

¹³⁰ *Id.* at 7-8.

¹³¹ *Id.* at 8.

changes to planning reserve margin methodology, load forecasting development, and seams coordination, and provides recommended reporting elements to the Commission.¹³²

76. PNM and EPE responded to the WRA Recommended Guiding Principles. PNM states that it generally supports WRA’s comments but provides a few clarifications.¹³³ For some of the reporting data recommended by WRA, including for market performance and GHG tracking and accounting, PNM states that it would be able to provide some high-level information at the balancing authority area level, but not at the individual utility level.¹³⁴ PNM states that it will assist in advocating to the market operator that the information be publicly available. PNM states that it supports the inclusion of policies described by WRA that reflect New Mexico’s policies on GHG emissions through those stakeholder processes. PNM also states that it supports a robust stakeholder process and has been an active and financial supporter of the Pathways Initiative and supports the West-wide regional planning efforts through “WestTEC.”¹³⁵ EPE states that it has not selected a market to join at this time and is still evaluating its options. EPE requests that to the extent the Commission considers additional, specific reporting requirements, this occur after EPE has initiated the process of joining a market.¹³⁶

j. WMEG Study

77. E3 presented the WMEG Study during the January 2024 Workshop. E3 stated that the WMEG Study was designed to provide WMEG members¹³⁷ with “credible information on the benefit of joining either Markets+ or EDAM.”¹³⁸ The WMEG Study focuses on variable

¹³² *Id.* at 8-9.

¹³³ PNM Response at 1.

¹³⁴ *Id.* at 1-2.

¹³⁵ *Id.* at 2-3.

¹³⁶ El Paso Electric Company’s Response to the Western Resource Advocates’ Guiding Principles and Criteria for Wholesale Market Evaluation and Reporting (“EPE Response”) at 1.

¹³⁷ The WMEG members are a group of 25 utilities and public power entities across the Western Interconnection.

¹³⁸ E3 January 25, 2024, Presentation to the NMPRC (“E3 Presentation”) at 5.

production costs and energy market prices, excluding potential capacity savings. PNM explains the WMEG Study did not explore the broader benefits of market formation such as generation investment savings, procurement savings, transmission planning or reliability improvements during extreme weather.¹³⁹

78. The WMEG Study used a multi-stage simulation of the Western Interconnection based on the PLEXOS production cost model. The simulation considered day-ahead and real-time market operations and accounted for load growth, wind and solar forecast errors, and transmission limitations. The simulation ran thousands of scenarios to model different market footprints, comparing the “Business-as-Usual” scenario against three primary market cases: “EDAM Bookend,” “Main Split,” and “Markets+ Bookend.”¹⁴⁰

79. The WMEG Study found that the “net cost impact” varied for entities across the Western Interconnection. According to PNM, the primary reasons for the variation were reduced wheeling revenues and changes in market purchase prices.¹⁴¹ Thus, the WMEG Study provided PNM’s results if wheeling revenues were all variable and waived in EDAM and Markets+ and results assuming wheeling revenues are unchanged in EDAM and Markets+ versus the Business-as-Usual scenario. E3 concluded that, if wheeling revenue is ignored for the “WMEG Core Case 2026,” then PNM would show \$6.1 million in savings in EDAM and \$5.1 million in savings in Markets+ compared to the Business-as-Usual scenario.¹⁴² E3 only provided EPE’s results with variable wheeling. E3 concluded that EPE would see a net cost of \$9.6 million in EDAM and \$6.0 million in Markets+ in “WMEG Core Case 2026” compared to the Business-as-Usual scenario.¹⁴³

¹³⁹ PNM Comments, Exhibit B at 9.

¹⁴⁰ *Id.* at 5-9

¹⁴¹ *Id.* at 19-20

¹⁴² E3 Presentation at 20.

¹⁴³ *Id.* at 23.

80. Prior to the presentation of PNM’s and EPE’s WMEG Study results, Interwest explained that due to the nature of the confidential information that each party included in the study, the actual study may not be made public. Interwest expressed concern about the secretive nature of the study effort, noting that it is “counter-productive for any utility to pursue, and ultimately justify an operational filing, in such a secretive manner.”¹⁴⁴ Interwest stated that providing greater transparency into the WMEG Study efforts, and all market decisions, would ensure there is better insight into and broad-based support for the market option that is ultimately best for New Mexico.¹⁴⁵

81. In their Joint Letter, Advanced Energy United, CEBA, Ceres, and WRA expressed concern that the study’s focus is too narrow. The Joint Letter writers assert that the WMEG Study overlooks other key benefits like generation investment and procurement savings, reliability improvements, and coordinated regional transmission planning. They further argue that the WMEG Study fails to account for transmission use charges designed by future day-ahead markets that will help reduce lost revenue. The Joint Letter writers contend that the WMEG Study is “insufficient for decision-making in isolation.”¹⁴⁶

k. Brattle Study

82. Brattle presented its analysis of the potential costs and benefits of PNM and EPE joining either the EDAM or Markets+ framework (“Brattle Study”) during the August 2024 Workshop. The Brattle Study modeled various scenarios with a focus on 2032 to see if and how the utilities would benefit from changes in resource mix and transmission infrastructure.

¹⁴⁴ Interwest Comments at 4-5.

¹⁴⁵ *Id.*

¹⁴⁶ Joint Letter at 1-2.

83. A key feature the Brattle Study looks at is different market options, including EDAM and Markets+, and how these new markets would interact with the existing real-time markets WEIM and WEIS. Though the study looks at how these markets would work together, it does not account for how EDAM or Markets+ might impact the current benefits that participants are receiving from WEIM and WEIS, and it does not explore what would happen if WEIM is broken up due to the new markets. The Brattle Study simulates realistic market footprints, adjusts production costs, wheeling revenue, bilateral trading profits, and congestion and transfer revenues. The study also models the specific GHG frameworks for EDAM and Markets+, and considers two extreme weather events to test how market operations would handle increased loads and gas prices during these conditions.¹⁴⁷

84. The Brattle Study concludes that PNM and EPE could benefit financially from participating in both EDAM and Markets+ with the estimated annual benefits being \$39.6 million for EDAM and \$17 million for Markets+. According to Brattle, EDAM has a greater benefit due to congestion revenues and production cost savings while the Markets+ model shows reduction in adjusted production cost but is offset by losses in bilateral trading revenue and decreased WEIM congestion revenue.¹⁴⁸

85. When comparing the adjusted production costs, the study finds that PNM and EPE could save nearly \$13 million annually by participating in EDAM. The primary drivers of these savings are reduced generation costs, increased day-ahead sales, and lower real-time purchases. In the Markets+ scenario, the annual savings are estimated to be almost \$23 million, with most of the benefits coming from increased sales in both the day-ahead and real-time market.¹⁴⁹

¹⁴⁷ Brattle August 29, 2024 Presentation to the NMPRC (“Brattle Presentation”) at 1-2

¹⁴⁸ *Id.* at 8-10.

¹⁴⁹ *Id.* at 11-12.

86. According to the Brattle Study, bilateral trading increases in EDAM and decreases in Markets+. The markets also differ in emissions according to the study, finding that EDAM would slightly decrease emissions for EPE and PNM, while Markets+ could result in a modest increase due to higher gas generation.¹⁵⁰

87. Overall, the study concludes that both market models would lead to operational and financial benefits for PNM and EPE, though these benefits would vary depending on the framework and strategies implemented.¹⁵¹

DISCUSSION

88. This endeavor aimed to develop guiding principles that PNM and EPE should consider when joining an electric regional day-ahead market or an RTO/ISO. The Commission facilitated a forum to (1) promote transparency by allowing the Commission, customers, and other stakeholders to learn how PNM and EPE are considering participation in day-ahead regional electric wholesale markets, (2) generate a conversation about the costs and benefits to ratepayers of increased regional market participation, and (3) create a platform for stakeholders to provide input into PNM and EPE's decision to join a market. Regionalization can provide New Mexicans with economic and reliability benefits. It is wise to consider the potential costs of enjoying those benefits. Accordingly, the Commission also sought to encourage PNM and EPE to proactively and thoroughly consider whether and which regional market to join.

89. Some parties in this proceeding recommended that the Commission consider issuing a rulemaking to establish a process and requirements for market participation. After careful consideration, the Commission declines to do so at this time. Like other significant decisions

¹⁵⁰ *Id.* at 19.

¹⁵¹ *Id.* at 9-12.

utilities make, the Commission encourages PNM and EPE to consider stakeholder input when making this decision. This proceeding has provided a forum for stakeholders to provide utilities such input. PNM has noted that it plans to decide whether to join EDAM or Markets+ during the fourth quarter of 2024. The Commission does not wish to delay or create a barrier to that decision. This order does not preclude the Commission from building upon this proceeding and adopting a rulemaking in the future.¹⁵²

90. Several parties propose that entering a day-ahead market option must only be an incremental step toward a full RTO. The Commission recognizes that day-ahead markets leave benefits on the table compared to a well-functioning RTO/ISO, especially in identifying price signals and processes needed to build transmission and unlock further economic and reliability benefits to ratepayers.

FINDINGS AND CONCLUSIONS

91. The Commission appreciates the input and presentations by stakeholders and utilities throughout this process. The Commission will continue collaborating with other Western entities to support a full RTO that will benefit New Mexico and encourage New Mexico utilities to do the same.

92. A statement of policy and guiding principles could assist a utility in assessing the near-term decision to join a regional day-ahead market. The Commission's statement of policy and guiding principles are attached herein as Attachment A.

¹⁵² The Commission also reserves its authority to evaluate the prudence of the utilities' decision if necessary and will also need to assess and approve the costs incurred to join a regional market at a later date.

93. The Commission finds that no reporting requirements have been created by this Order or Attachment A but that the Commission may request market participation-related reports under its general powers at a later date.

IT IS THEREFORE ORDERED:

A. The Commission's Statement of Policy and Guiding Principles to Regional Market Participation, attached to this Order as Attachment A, are ADOPTED.

B. The attached Statement of Policy and Guiding Principles shall not be construed as a rule or regulation. This Statement of Policy and Guiding Principles shall not create any requirements or rights. The issuance of this Statement of Policy and Guiding Principles shall not preclude the Commission from building upon this proceeding and adopting a rulemaking in the future.

C. This Order is effective when signed.

D. A copy of this Order shall be served upon all persons listed on the attached Certificate of Service via e-mail if their e-mail addresses are known; otherwise, via regular mail. In computing time in accordance with Statute, Regulation, or Commission Order, the computation shall begin on the date that the Order is filed with the Chief Clerk or Chief Clerk designee.

**SIGNED under the Seal of the Commission at Santa Fe, New Mexico, this 31st day of
October, 2024.**

NEW MEXICO PUBLIC REGULATION COMMISSION

/s/ Gabriel Aguilera, electronically signed
GABRIEL AGUILERA, COMMISSIONER

/s/ James F. Ellison, Jr., electronically signed
JAMES F. ELLISON, JR., COMMISSIONER

/s/ Patrick J. O'Connell, electronically signed
PATRICK J. O'CONNELL, COMMISSIONER



ATTACHMENT A



COMMISSIONERS

GABRIEL AGUILERA
JAMES ELLISON
PATRICK O'CONNELL

P.O. Box 1269
Santa Fe, NM 87504-1269

NEW MEXICO PUBLIC REGULATION COMMISSION'S STATEMENT OF POLICY AND GUIDING PRINCIPLES FOR REGIONAL MARKET PARTICIPATION¹⁵³

The New Mexico Public Regulation Commission (the "Commission") issues this statement of policy and guiding principles to assist utilities in assessing the near-term decision to join a regional day-ahead market. The Commission believes that regional markets could economically benefit New Mexico's ratepayers and that regional markets have the potential to help New Mexico improve grid reliability and reach emission reduction targets. This document is the culmination of a stakeholder process and identifies five overarching guiding principles and brings forth considerations that the Commission encourages utilities to contemplate when assessing market participation.

First, the Commission believes that the primary driver of any market decision must be customer benefits, prioritizing economic and reliability benefits. When determining whether a market decision is to the customer's benefit the Commission recommends that the utility evaluate the following factors:

¹⁵³ A statement of policy should not be construed as a rule or regulation. *See* 17.1.120.7(B) NMAC. This document is intended to bring forth considerations --- drawn from a stakeholder process --- that utilities may consider when contemplating market participation. This guidance is not intended to, and does not, create any requirements or rights. This document does not substitute for, amend, or supersede any statute, regulation, or pertinent order of federal or state agencies. This document imposes no new legal obligation and grants no additional rights.

- The expected or likely market footprint (in an early adopter situation) and whether the market has, or is expected to have, sufficient regional counterparties and diversity to support the utility's wholesale market needs, including non-coincident peak load events, deliverability, and market liquidity;
- Which regional day-ahead market (EDAM or Markets+) provides the most consequential customer benefits. A comparative analysis of market design would be helpful in this determination;
- Each market's potential for improving the efficient and economic dispatch of resources, comparing market designs to evaluate their expected efficiency in dispatching New Mexico resources economically. Similarly, the potential of each market's design to unreasonably or unnecessarily decrease the efficiency of dispatching resources serving the utility's retail load;
- The utility's ability under each market to insulate customers from unreasonable transmission congestion costs and receive just and reasonable compensation for transmission rights;
- The cost and ease of market entry and exit;
- The estimated customer costs and benefits of joining a day-ahead regional market assuming realistic scenarios and market seams, including with and without transmission capacity known to be likely operational in the future;

- Whether EDAM, Markets+, or the status quo (bilateral market and WEIM) provide for the best outcomes in a cost-benefit assessment. A useful cost-benefit assessment might include:
 - a. Production cost modeling, accounting for significant differences in market design;
 - b. Generation capacity cost savings, considering programmatic sharing of load and resource diversity across a larger footprint and associated changes to the utility's planning reserve margin methodology;
 - c. Reliability enhancements during extreme weather and other challenging operational conditions; and
 - d. Impact of transmission costs and revenues on ratepayers;
- The market's governance structure and whether it is independent of market participants and fairly balances the interests of all market participants to maintain market confidence and stability;
- The adequacy of the market design's market power mitigation mechanisms, including the market monitor's ability to identify market inefficiencies and to prevent, identify, and adequately handle the exercise of horizontal and vertical market power and manipulation;
- Consider which regional market the regulated utility expects to yield the most significant benefits to the utility's New Mexico ratepayers.

Second, a utility's market participation should not interfere with the utility's obligations to comply with New Mexico statutes. Accordingly, the Commission suggests that utilities review the following factors before deciding on market participation:

- Barriers or challenges imposed by the markets to the utility's compliance with New Mexico's emissions mandates; and
- The market operator's ability to provide GHG tracking and accounting data with sufficient granularity and frequency for the utility to demonstrate compliance with New Mexico's emissions mandates.

Third, the Commission supports full transparency in market participation. The Commission encourages utilities to ask the following when entering the market:

- Whether the market has a transparent decision-making process that facilitates diverse and meaningful stakeholder engagement and considers stakeholder input fairly; and
- Whether the stakeholder process creates unreasonable demands or barriers to participation and whether the decision-making process includes a fair dispute resolution and appeals process.

Fourth, the Commission believes that the decision to join a market should include stakeholder input and that the utility should provide relevant information to allow for meaningful engagement of interested stakeholders. The Commission encourages the utilities to do the following to facilitate this collaboration:

- Consider stakeholder input in the decision to enter a regional day-ahead market;
- Make study assumptions and results available to regulators and stakeholders;

- Base its market choice on these guidance principles, which were established through a stakeholder process; and
- Make available the information relied upon by the utility in the market choice be submitted to the Commission.

Lastly, the Commission should stay apprised of the utility's market participation and the utility's performance in the market. Toward that end, the Commission recommends the utilities provide the information set out below:

- Regular updates on substantive changes to the market, including but not limited to changes to market design, participants, decision-making processes, and cost structure;
- Alert the Commission, tribal interests, and other New Mexico stakeholders of opportunities for participation in market decision-making processes; and
- Post-market entry, reporting quarterly reports for the first two years of the utility's market participation and annual reporting thereafter, including on the following:
 - a. Operational cost savings to customers
 - b. Explanation of energy transfers between the utility's balancing authority area and other balancing authority areas
 - c. Efficiency of economic and automatic energy dispatch
 - d. Impacts on utility resource planning and procurement
 - e. Tracking of interchange transfers associated with seams with adjoining markets and interoperability agreements
 - f. Transmission availability and use

- g. Renewable resource curtailment and GHG emissions
- h. Resource adequacy and system reliability and resiliency, including market performance during extreme weather events
- i. Effectiveness of the market’s market power mitigation measures
- j. Governance structures, as well as opportunities for New Mexico stakeholder engagement in market decision-making processes, and
- k. Any additional evaluation conducted on the utility’s performance in the market, including ideas for potential design improvements that would benefit New Mexico ratepayers through increased market efficiency and performance.

The Commission encourages utilities to use these guiding principles as the foundation upon which the utility’s decision for regional day-ahead market participation is based. The Commission appreciates the stakeholders’ and utilities’ participation in developing these principles and considerations.

SIGNED under the Seal of the Commission at Santa Fe, New Mexico, this 31st day of October, 2024.

NEW MEXICO PUBLIC REGULATION COMMISSION

/s/ Gabriel Aguilera, electronically signed
GABRIEL AGUILERA, COMMISSIONER

/s/ James F. Ellison, Jr., electronically signed
JAMES F. ELLISON, JR., COMMISSIONER

/s/ Patrick J. O’Connell, electronically signed
PATRICK J. O’CONNELL, COMMISSIONER



BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF AN INQUIRY AND)
POTENTIAL RULEMAKING PERTAINING) Docket No. 23-00268-UT
TO INVESTOR-OWNED ELECTRIC)
UTILITIES' REGIONAL MARKET ACTIVITY)**

CERTIFICATE OF SERVICE

I CERTIFY that on this date I sent via email, to the parties listed below a true and correct copy of the foregoing ***Order Issuing Statement of Policy and Guiding Principles for Regional Market Participation.***

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Tularosa Corns., Inc.
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U.S. TelePacific Corp dba TPx Communications
Unite Private Networks, LLC
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US Mobile LLC
USA Digital Communications, Inc.
Utility Telecom Group, LLC
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Vonage America, Inc
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Valu Tel Communications, Inc.
Velocity, A Managed Service Company, Inc.
Verizon Select Services, Inc.
Via Talk, LLC
ViaSat, Inc.
Victor Snover
Victor Vigil
Vidal Martinez
Vincent Martinez
Virgin Mobile USA, LLC
Visible Service LLC
Vive Communications, LLC
Vodafone US Inc.
Voicecom Telecom., LLC
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Voyageur Security Inc. dba Access Technologies
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NEW MEXICO PUBLIC REGULATION COMMISSION

/s/ LaurieAnn Santillanes, electronically signed
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