

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**AMENDED APPLICATION FOR APPROVAL OF)
EL PASO ELECTRIC COMPANY'S)
2022 RENEWABLE ENERGY ACT PLAN)
PURSUANT TO THE RENEWABLE ENERGY)
ACT AND 17.9.572 NMAC, AND SIXTH)
REVISED RATE NO. 38-RPS COST RIDER)
)
)
)**

Case No. 22-00093-UT

DIRECT TESTIMONY OF

DEVI GLICK

ON BEHALF OF NEW MEXICO OFFICE OF THE ATTORNEY GENERAL

JANUARY 9, 2023

TABLE OF CONTENTS

LIST OF EXHIBITS.....	3
LIST OF FIGURES	3
List of Tables	3
1. Introduction and purpose of testimony	4
2. Findings and recommendations	6
3. EPE is requesting to increase the price of the Carne PPA and to pass the associated costs on to its ratepayers	9
i. EPE is requesting approval of the PPA for the Carne Project, which has a higher price for both the solar PV and battery storage than what EPE originally negotiated.....	9
ii. EPE’s ratepayers will bear the impact of high PPA costs, therefore the Commission should be vigilant in reviewing PPA terms and amendments to protect ratepayers from unnecessary costs and changes	14

LIST OF APPENDICES

DG-1: Resume of Devi Glick
DG-2: Case No. 19-00099/19-00348: EPE Response to OAG Request 2-5.
DG-3 Affirmation of Devi Glick

LIST OF FIGURES

Figure 1. EPE 2020 energy fuel mix.....10

LIST OF TABLES

Table 1. PPAs with a price increase.....17

1 **1. INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q Please state your name and occupation.**

3 **A** My name is Devi Glick. I am a Senior Principal at Synapse Energy Economics,
4 Inc. (“Synapse”). My business address is 485 Massachusetts Avenue, Suite 3,
5 Cambridge, Massachusetts 02139.

6 **Q Please describe Synapse Energy Economics.**

7 **A** Synapse is a research and consulting firm specializing in energy and
8 environmental issues, including electric generation, transmission and distribution
9 system reliability, ratemaking and rate design, electric industry restructuring and
10 market power, electricity market prices, stranded costs, efficiency, renewable
11 energy, environmental quality, and nuclear power.

12 Synapse’s clients include state consumer advocates, public utilities commission
13 staff, attorneys general, environmental organizations, federal government
14 agencies, and utilities.

15 **Q Please summarize your work experience and educational background.**

16 **A** At Synapse, I conduct economic analysis and write testimony and publications
17 that focus on a variety of issues related to electric utilities. These issues include
18 power plant economics, electric system dispatch, integrated resource planning,
19 environmental compliance technologies and strategies, and valuation of
20 distributed energy resources. I have submitted expert testimony before state utility
21 regulators in more than a dozen states.

1 In the course of my work, I develop in-house models and perform analysis using
2 industry-standard electricity power system models. I am proficient in the use of
3 spreadsheet analysis tools, as well as optimization and electric dispatch models. I
4 have directly run EnCompass and PLEXOS and have reviewed inputs and outputs
5 for several other models.

6 Before joining Synapse, I worked at Rocky Mountain Institute, focusing on a
7 wide range of energy and electricity issues. I have a master's degree in public
8 policy and a master's degree in environmental science from the University of
9 Michigan, as well as a bachelor's degree in environmental studies from
10 Middlebury College. I have more than 10 years of professional experience as a
11 consultant, researcher, and analyst. A copy of my current resume is attached as
12 Exhibit DG-1.

13 **Q On whose behalf are you testifying in this case?**

14 **A** I am testifying on behalf of the Office of the New Mexico Attorney General.

15 **Q Have you testified previously before the New Mexico Public Regulation
16 Commission (“PRC” or “Commission”)?**

17 **A** Yes. I submitted testimony in Case No. 21-00200-UT and 19-00170-UT. I also
18 will be filing testimony on behalf of the Office of the New Mexico Attorney
19 Generation in Case No. 19-00348-UT / 19-00099-UT.

20 **Q What is the purpose of your testimony in this proceeding?**

21 **A** In this proceeding, I review the amended application of El Paso Electric Company
22 (“EPE” or “The Company”) for approvals related to EPE’s 2022 Renewable
23 Energy Act (“REA”) plan, including an updated price for the Carne Power

1 Purchase agreement (“PPA) for the solar photovoltaic (“PV”) and battery storage
2 project. I review the explanations presented by the Company to find whether the
3 updated PPA price is still in the best interest of EPE’s ratepayers relative to the
4 cost of alternatives. I outline my recommendations to the Commission on actions
5 it can take to protect ratepayers in the current market with inflation and supply
6 chain challenges.

7 **Q How is your testimony structured?**

8 **A** In Section 2, I summarize my findings and recommendations for the Commission.
9 In Section 3, I describe EPE’s request for approval of the Carne PPA with an
10 updated price. I also discuss how the Commission should increase oversight and
11 scrutiny over PPAs and PPA amendments to reduce risks and undue costs
12 imposed on ratepayers.

13 **Q What documents do you rely upon for your analysis, findings, and**
14 **observations?**

15 **A** My analysis relies primarily upon the workpapers, exhibits, and discovery
16 responses of EPE’s witnesses. I also rely on other publicly available documents.

17 **2. FINDINGS AND RECOMMENDATIONS**

18 **Q Please summarize your findings.**

19 **A** My primary findings are:

- 20 1. Even at the updated price, the Carne solar PV and battery storage project
21 is still in the best interest of EPE ratepayers. If the Carne project is not
22 approved, ratepayers will face higher costs and higher risks from market

- 1 exposure, gas price volatility, and uncertainty in future project
2 development costs and timelines.
- 3 2. EPE’s request for a price increase and project delays is not unique or
4 unreasonable in the current market—with supply chain challenges and
5 increased inflation, I have seen an uptick in PPA amendments across the
6 country that seek to increase project prices and shift back project
7 timelines.
- 8 3. There are many things EPE can and should do, both now and in signing
9 future PPAs to limit risks to ratepayers and increase oversight of
10 developer actions under PPAs.

11 **Q Please summarize your recommendations.**

12 **A** Based on my findings, I offer the following recommendations:

- 13 1. The Commission should approve EPE’s request to approve the updated
14 Carne PPA.
- 15 2. The Commission should require increased transparency of the analysis
16 behind why the cost of the Carne PPA went up from the price bid in the
17 initial PPA.
- 18 3. In this and all future PPAs, the Commission should require EPE to
19 explicitly outline the conditions under which re-negotiation of a PPA
20 commercial operation date (“COD”) is permitted without breaching the
21 contract, incurring damages or otherwise requiring a formal PPA
22 amendment. In the event of a delay, EPE should be required to file notice
23 of the delay with the Commission, and EPE should be required to estimate
24 in advance and report the costs that it projects it will incur in the time
25 between the original COD and the delayed COD. These reported costs
26 should include those incurred to procure replacement resources and
27 compensation/damages the developer is providing for the delays.
- 28 4. In this and all PPAs and PPA amendments, EPE should be required to
29 provide clear and transparent information on the amount of the damages,
30 how they are calculated, and the time period of replacement energy

- 1 covered. This will allow the Commission to better weigh the cost of the
2 power and the risks imposed on ratepayers.
- 3 5. The Commission should require EPE to exercise increased oversight of
4 project development and construction, and to provide regular public
5 reporting on project progress and how progress matches with projected
6 milestones. In the case of delays, EPE should document reasons for the
7 delay, as well as actions taken to mitigate impacts on ratepayers.
- 8 6. In the event EPE seeks a PPA amendment in the future for a further price
9 increase or project delay, the Commission should require increased
10 transparency of the analysis behind the requested price increase. This
11 includes an estimation of the costs that will be incurred by ratepayers due
12 to the change in price or timeline, documentation showing how project
13 materials and labor costs have increased between the present and when the
14 PPA was signed, documentation showing how much of the cost increase
15 the developer is taking on, as well as demonstration that the cost increase
16 does not provide the developer with higher profit than under the original
17 PPA.
- 18 7. In the event EPE seeks a PPA amendment in the future, EPE should file
19 documentation showing how, in light of the delays, the developer can be
20 reasonably expected to deliver the project on the amended timeline—this
21 should include documentation of construction milestones and progress to
22 date, and a projected milestone schedule for completing additional phases
23 of the project. EPE should regularly amend and update this whenever new
24 information becomes available.
- 25 8. For any project with a delayed Commercial Operation Date (“COD”),
26 after the projects come online, EPE should evaluate the actual impact of
27 the projects’ delays on customers (i.e., the cost of buying from the market
28 or relying on alternatives, and total damages awarded to EPE, if any) and
29 provide this information to the Commission in a report. This should be
30 required regardless of whether the delay was agreed to under the original
31 PPA or an amendment PPA.

1 **3. EPE IS REQUESTING TO INCREASE THE PRICE OF THE CARNE PPA AND TO PASS THE**
2 **ASSOCIATED COSTS ON TO ITS RATEPAYERS**

3 ***i. EPE is requesting approval of the PPA for the Carne Project, which has a***
4 ***higher price for both the solar PV and battery storage than what EPE originally***
5 ***negotiated***

6 **Q What is EPE requesting in this docket?**

7 **A** EPE is requesting approval of the Carne PPA for 130 megawatts (“MW”) of solar
8 PV and 65 MW of battery storage at a price of \$29.96/MWh for the solar and
9 \$10.99/kw-month for the battery storage.¹ The project was procured through an
10 August 10, 2021 All-Source request for proposal (“RFP”) (“2021 All-Source
11 RFP”) and is expected to be commercially operational by May 1, 2025. It will be
12 developed by D.E. Shaw Renewables Investments (“DESRI”). The project is
13 expected to meet 40 percent of EPE’s renewable portfolio standard (“RPS”) target
14 when it comes online in 2025.²

15 **Q What are some of the benefits of the Carne project relative to alternatives?**

16 **A** The solar PV and battery storage in the PPA continue to diversify the Company’s
17 energy mix and reduces its dependence on fossil resources and market power,
18 both of which can be subject to volatility and price fluctuation. Solar power is
19 also clean and zero emission, while market power and power procured from
20 bilateral contracts may be generated from fossil resources. Solar PV and battery
21 storage add resiliency to the grid, should there be natural gas supply constraints.

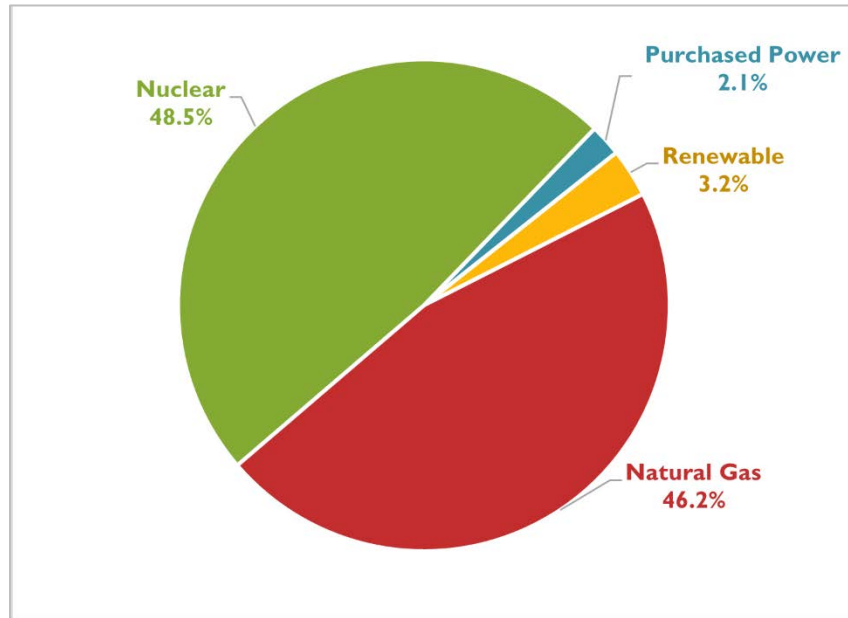
¹ Amended Application, Pg. 2.

² Amended Application, Direct Testimony of Martinez, Pgs. 13-14.

1 The Carne project also protects ratepayers from carbon taxes or other
2 environmental regulations that may be imposed in the future, which could
3 increase the cost to operate the Company's existing fossil resources. As can be
4 seen from Figure 1, the Company's fuel mix is heavily reliant on nuclear and
5 natural gas, and as of 2020, renewable energy comprised just 3.2 percent of total
6 generation³.

7 Additionally, given the increase in project delays and supply-chain challenges
8 today, the traditional utility planning model of perfectly matching resource
9 additions with capacity needs no longer best serves ratepayers. Utilities should
10 look at proactive deployment of renewable resources as an insurance policy and a
11 hedge against fossil and market price volatility.

12 **Figure 1. EPE 2020 energy fuel mix**



13
14

Source: Figure 12 in *El Paso Electric 2021 Integrated Resource Plan*, pg. 69.

³ El Paso Electric 2021 Integrated Resource Plan. 2021, Pg. 69.

1 **Q Is the Carne PPA price EPE seeks approval for different from the price the**
2 **developer originally bid?**

3 **A** Yes. The price is higher. DESRI cited the following challenges in the market as
4 impacting its proposal: inflation, the U.S. Department of Commerce investigation,
5 commodity price volatility, uncertainty in economic trends, and supply chain
6 issues.⁴

7 **Q Is the PPA timeline in EPE’s amended application different than what the**
8 **developer originally bid?**

9 **A** No. But EPE’s experience with the Buena Vista and Hecate projects in ongoing
10 Cases 19-00348-UT/ 19-00099-UT highlights the risk that even after the PPA is
11 signed and approved by the Commission, EPE could delay the Carne project
12 beyond the target date of May 1, 2025. And these delays impose costs on
13 ratepayers. EPE can seek delays through either (1) an extension agreement
14 between EPE and the developer under the original PPA; or (2) a formal
15 amendment approved by the Commission. EPE has sought both types of delays
16 for Buena Vista and Hecate.

17 **Q Explain the extensions that EPE agreed to under the original Buena Vista**
18 **and Hecate PPAs and why the Commission should be concerned about that**
19 **for Carne.**

20 **A** For both Buena Vista and Hecate, EPE agreed to an extension from the original
21 COD of May 2022 under the original PPA. I will refer to the extended dates

⁴ Amended Application, Direct Testimony of Victor Martinez, Pg. 22.

1 agreed to under the original PPA as the “negotiated CODs.” These extensions
2 were prompted by supply chain issues⁵ and general concerns from the developer
3 that the schedule was too tight for facility construction and interconnection.⁶

4 A key point here is that EPE and the developers negotiated the new CODs under
5 the original PPA because the delays were not classified as permitted delays in the
6 original contracts. In other words, EPE and the developers agreed to extend the
7 COD to avoid the developers defaulting and then incurring damages for the delay.
8 It is unclear why EPE allowed the developers to negotiate the extensions without
9 any damages or penalties. This is concerning for Carne specifically, and for future
10 PPAs more generally, because ratepayers have no assurances that EPE will not
11 once again negotiate an additional extension with the developers without
12 collecting damages to cover the incremental costs that the delays impose on
13 ratepayers.

14 **Q Explain the PPA amendments that EPE seeks for Buena Vista and Hecate**
15 **and why the Commission should be concerned about an additional**
16 **amendment delaying the COD for Carne?**

17 **A Both the Buena Vista and Hecate projects are now expected to experience delays**
18 beyond the negotiated CODs. This prompted EPE to request approval for
19 amendments to the original PPAs. This incremental delay is based on supply

⁵ Docket 19-00348-UT/ Docket 19-00099-UT Amended application, Pg. 6; Direct Testimony of Hawkins, Pg. 8.

⁶ Docket 19-00348-UT/ Docket 19-00099-UT Amended application, Pg. 6; Direct Testimony of Hawkins, Pgs. 20.

1 chain issues that have impacted the availability of solar panels, as well as the U.S.
2 Department of Commerce investigation into “panel dumping.”⁷

3 EPE’s request for an additional delay is concerning because when a project is
4 delayed, EPE must procure replacement energy and capacity in the time between
5 the original and new COD (in this case, between the negotiated CODs and the
6 new CODs). This replacement energy and capacity will likely come from the
7 Company’s existing gas resources, which rely on volatile and expensive natural
8 gas, and market energy, which is also currently expensive and volatile.

9 Additionally, EPE may have minimal leverage because, as we have seen with
10 Buena Vista and Hecate: (1) the project is still likely the lowest-cost option
11 relative to alternatives, even given the current supply chain issues faced by EPE’s
12 contractual counterparts;⁸ (2) it would take years (three-and-a-half to five years)⁹
13 to bring replacement resources online if EPE abandoned a project and went back
14 out to bid new resources;¹⁰ (3) the damages that EPE would receive from the
15 developer if EPE canceled the project may not be not sufficient to cover the
16 replacement resource costs.¹¹

⁷ Docket 19-00348-UT/ Docket 19-00099-UT Amended Application, Pg. 6; Direct
Testimony of Hawkins, Pg. 7-8.

⁸ Docket 19-00348-UT/ Docket 19-00099-UT Amended Application, Pg. 2.

⁹ Docket 19-00348-UT/ Docket 19-00099-UT, EPE Response to NMAG Request 2-5.

¹⁰ Id.

¹¹ Docket 19-00348-UT/ Docket 19-00099-UT Amended Application Direct Testimony
of Hawkins, Pg. 12.

1 **ii. EPE's ratepayers will bear the impact of high PPA costs, therefore the**
2 **Commission should be vigilant in reviewing PPA terms and amendments to**
3 **protect ratepayers from unnecessary costs and changes**

4 **Q What risks do PPAs pose to EPE's ratepayers?**

5 **A There are a number of risks posed by PPAs. All these risks can be managed by**
6 appropriate oversight and transparency.

7 First, PPA costs are directly passed through to ratepayers. This means that, unlike
8 projects built and owned by the Company, EPE earns no rate of return on the
9 projects. This implies that there is no direct financial incentive for EPE to
10 minimize costs.

11 Second, as we saw with Buena Vista and Hecate, PPA terms can give EPE wide
12 discretion to negotiate changes with the developer under the original contract
13 without Commission approval. This discretion includes allowing the developer to
14 delay the project without paying damages or otherwise compensating ratepayers
15 for the costs they incur during the delay. The discretion granted to EPE, and the
16 risks posed by this flexibility are not always clear to ratepayers and the
17 Commission from the start.

18 Third, there generally is little transparency on how damages are calculated and
19 what they are intended to cover (for example, are they projected to cover six
20 months of replacement energy or two years?). As with any contract, with a PPA
21 there is an inherent trade-off between the level of risk and the cost of the PPA.
22 But the Commission and ratepayers currently have little information on where
23 that balance lies in a PPA and therefore what level of risk EPE is asking them to
24 bear.

1 Fourth, if developers see that EPE is willing to seek, and the Commission willing
2 to approve, PPA amendments any time its costs rise unexpectedly, the result is
3 imposition of risk on the ratepayers and not on the developer or the Company. If
4 the Commission approves PPA amendments without subjecting them to a higher
5 level of scrutiny and continued oversight, such an action could set an unwarranted
6 precedent. This creates the risk of future PPA amendment requests that may or
7 may not be prudent for the utility to consider and the Commission to approve.

8 **Q Given the substantial risks posed by third-party PPAs, why are PPAs so**
9 **prevalent?**

10 **A** Despite the risks I outlined above, third-party PPAs are very important for
11 renewable energy development. First, developers, especially those experienced
12 with renewable project development, can often build renewable projects more
13 quickly and at a lower cost than the utility can. Private developers may also be
14 able to access tax credits in a way that the utility cannot, thus allowing the
15 developer to pass the credits on to ratepayers through a lower project cost. And, as
16 I mentioned above, with proper Commission oversight, the risks posed by PPAs
17 can be sufficiently managed. To mitigate the risks and deter developers from
18 taking advantage of ratepayers, the Commission should require greater
19 transparency and scrutiny over original PPA terms, and subsequent requests for
20 amendments, as I discuss below.

21 **Q Can increased Commission scrutiny over PPAs protect ratepayers?**

22 **A** Yes. Increased scrutiny by the Commission will send an important deterrent
23 signal to opportunistic developers that seek to take advantage of this environment
24 to raise prices simply because current market prices are higher than what they
25 originally negotiated. Increased scrutiny of PPA amendments may also deter

1 developers from underbidding projects initially to secure a contract, and then
2 increasing the price under threat of walking away from the project if they don't
3 get the requested price amendment. In these instances, Commission oversight and
4 scrutiny can help protect consumers from the incremental cost of project delays,
5 including the increase in the project cost itself, as well as the cost of replacement
6 energy required to cover the period the project is delayed.

7 **Q Do you believe that there are situations where PPA amendments are**
8 **reasonable and should be approved by the Commission?**

9 **A** Yes. I believe that it is reasonable, especially in unprecedented market
10 environments like we see today with inflation and supply chain challenges, to
11 allow for amendments. This is especially pertinent when the project is still being
12 offered at a competitive price relative to alternatives and will be available on a
13 faster timeline than any new PPAs. EPE is not unique in experiencing supply
14 chain challenges and requesting delays and amendments to its PPAs.

15 I have seen a handful of other utilities facing a similar challenge of needing to
16 update the price and timeline of a PPA. Table 1 below shows a list of the PPAs I
17 have tracked that have requested an amendment to increase the project price (note
18 this list is not intended to be exhaustive). This does not mean that EPE merits
19 unconditional support for contract amendments, but it does support the
20 reasonableness of considering whether amended PPAs are still in the best interest
21 of ratepayers.

1

Table 1. PPAs with a price increase

Project name	Location	Developer	Project Size (MW)
Commonwealth Wind	MA	Avangrid	1,200
Mayflower Wind	MA	Mayflower Wind	400
Hecate 1 Solar	NM	Hecate Energy	100
Hecate 2 Solar	NM	Hecate Energy	50
Buena Vista 1 Solar	NM	NextEra	100
Buena Vista 2 Solar	NM	NextEra	20
Buena Vista Storage	NM	NextEra	50
San Juan Solar 1	NM	DESRI	200
San Juan Solar Storage	NM	DESRI	100
Group of 18 Solar Projects	Puerto Rico	Various	845

2
3
4
5

Note: Avangrid announced on 12/16/2022 that it was pulling out of Commonwealth Wind and would re-submit its bid with updated pricing requirements when Massachusetts begins its next offshore wind procurement in April 2023. Avangrid still believes the project can come online on time.

6
7

Q What should the Commission do to better protect ratepayers from the risks posed by PPAs in the future?

8
9
10
11
12
13
14
15

A First, the Commission should not allow EPE to sign PPAs, or PPA amendments, that give developers unlimited freedom to renegotiate CODs without damages. I recommend the Commission require PPAs to contain specific terms under which re-negotiated CODs are allowed without incurring damages, penalties or Commission approval. Likewise, the Commission should require EPE to file notice of all Permitted Extensions or requests for Permitted Extensions¹² from the developer, including permitted extensions due to the Withhold Release Order stemming from the US Department of Commerce’s anti-dumping investigation. In

¹²As set forth in Section 4.4 of Buena Vista 1 PPA Amendment (Exhibit DCH-4); Section 4.4.1 of Buena Vista 2 PPA Amendment (Exhibit DCH-5), Section 4.4 of Hecate 2 PPA (Exhibit DCH-7) and Section 4.4 of Hecate 2 PPA (Exhibit DCH-8).

1 filing for an extension, EPE should be required to include analysis that estimates
2 the costs that it will incur in the time between the original COD and the delayed
3 COD, including the cost incurred to procure replacement resources, and
4 compensation/damages the developer is providing for the delays.

5 Second, in both initial PPAs and PPA amendments, EPE should provide clear and
6 transparent information on the amount of the damages, how they are calculated,
7 and the time period of replacement energy covered. This will allow the
8 Commission to better weigh the cost of the power and the risks imposed on
9 ratepayers.

10 Third, for any project with a delayed COD, EPE should actively track the costs
11 incurred in the time between the original COD and the amended COD, including
12 the cost incurred to procure replacement resources, and compensation/damages
13 the developer is providing for either past or future delays. EPE should provide this
14 information to the Commission in a quarterly report. This should be required
15 regardless of whether the delay was agreed to under the original PPA or a PPA
16 amendment.

17 Fourth, and more generally, the Commission should require EPE to be more
18 transparent with its project management and provide more oversight of
19 construction progress in general. At a minimum, I recommend that the
20 Commission require the Company to file construction progress updates quarterly
21 to the Commission and other relevant parties. This should include work done by
22 subcontractors or other companies involved in the project, as well as work done
23 by the Company itself (e.g., for transmission interconnection).

1 **Q What actions should the Commission take to ensure ratepayers are protected**
2 **from PPA amendments in the future?**

3 **A** First, anytime EPE seeks a project amendment, the Commission should require a
4 reasonable level of analysis from the developer and the Company to demonstrate
5 that the proposed cost increase is reasonable. This should include: (1) estimation
6 of the cost of the delay (as explained above); (2) documentation showing the cost
7 of materials and labor originally estimated and the current cost of materials and
8 labor, to demonstrate that total amount by which project costs have increased; (3)
9 analysis showing the amount of the cost increase that the developer is taking on
10 compared to what the developer is asking the ratepayers to take on; (4) analysis
11 showing that none of the cost increase is being used to provide the developer with
12 a higher level of profit/return than under the originally negotiated PPA.

13 Second, EPE should file documentation showing how, in light of the delays, the
14 developer can be reasonably expected to deliver the project on the amended
15 timeline—this should include documentation of construction milestones and
16 progress to date, and a projected milestone schedule for completing additional
17 phases of project. EPE should regularly amend and update this whenever new
18 information becomes available.

19 **Q What are your conclusions about the Carne PPA relative to alternatives?**

20 **A** Although the cost has changed from the original project bid, the Carne PPA is still
21 considerably less costly to EPE ratepayers than the alternatives, including
22 continuing to rely on the Company's existing fossil resources, purchasing market
23 power, and/ or deferring the decision to build more solar PV and battery storage
24 for a few more years. Although the approval of the PPA does not come without its

1 own risks, the cost impact of any current alternative is much greater than the
2 amended PPAs. I therefore recommend approval of the Carne PPA.

3 **Q Does this conclude your testimony?**

4 **A** Yes.

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

AMENDED APPLICATION FOR APPROVAL OF)
EL PASO ELECTRIC COMPANY'S)
2022 RENEWABLE ENERGY ACT PLAN) Case No. 22-00093-UT
PURSUANT TO THE RENEWABLE ENERGY ACT)
AND 17.9.572 NMAC, AND SIXTH REVISED)
RATE NO. 38-RPS COST RIDER)
)
)
)
)

AFFIRMATION (IN LIEU OF AFFIDAVIT)
OF DEVI GLICK

In compliance with the *Temporary NMPRC Electronic Filing Policy of March 20, 2020*, and under Rule 1-011(B) NMRA of the New Mexico Rules of Procedures for the District Courts, I, Devi Glick, hereby file this testimony on behalf of the New Mexico Attorney General and state as follows:

I hereby affirm in writing under penalty of perjury under the laws of the State of New Mexico that the statements contained in the foregoing *Direct Testimony of Devi Glick on Behalf of the Office of Attorney General* are true and correct to the best of my knowledge, information, and belief.

I further declare under penalty of perjury that the foregoing is true and correct.

Executed on January 9, 2023.

/s/ Devi Glick
Devi Glick (electronically signed)
Expert Witness on Behalf of the New Mexico Attorney General
485 Massachusetts Avenue #3
Cambridge, MA 02139

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF EL PASO ELECTRIC COMPANY'S)
AMENDED APPLICATION FOR APPROVAL OF ITS)
AMENDED 2019 RENEWABLE ENERGY PLAN AND) CASE NO. 19-00099-UT
2020 RENEWABLE ENERGY ACT PLAN PURSUANT)
TO THE RENEWABLE ENERGY ACT AND 17.9.572 NMAC,)
AND THIRD REVISED RATE NO. 38 – RPS COST RIDER)

AND

IN THE MATTER OF EL PASO ELECTRIC COMPANY'S)
APPLICATION FOR APPROVAL OF LONG-TERM)
PURCHASED POWER AGREEMENTS WITH HECATE) CASE NO. 19-00348-UT
ENERGY SANTA TERESA, LLC, BUENA VISTA ENERGY,)
LLC, AND CANUTILLO ENERGY CENTER LLC)

EL PASO ELECTRIC COMPANY'S RESPONSE TO
THE NEW MEXICO ATTORNEY GENERAL'S SECOND SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTION NOS. AG 2-1 THROUGH AG 2-11

Attorney General 2-5.:

Refer to the Direct Testimony of Company witness Hawkins, page 25, regarding the timeline for procuring replacement resources.

- a. Provide the basis of the four year estimate.
- b. State whether the estimated time varies by resource type.
- c. Provide the estimated time, by resource type, the Company projects it takes for a project to come online starting from the RFP stage. Provide this separately for PPAs and utility owned projects for solar PV, wind, battery storage, and hybrid solar + battery storage projects.

RESPONSE:

Please see objections. Without waiving these objections, El Paso Electric Company ("EPE") responds as follows:

- a. Based on EPE's past experience, the estimated time for a project to come online from initiation of the RFP can take anywhere from 3-1/2 years to 5 years.

- b. Please refer to EPE's response to AG 2-5 a above.
- c. Please refer to EPE's response to AG 2-5 a above.

Preparer: David C. Hawkins

Title: Vice President – System Operations and
Resource Strategy

Sponsor: David C. Hawkins

Title: Vice President – System Operations and
Resource Strategy

Devi Glick, Senior Principal

Synapse Energy Economics | 485 Massachusetts Avenue, Suite 3 | Cambridge, MA 02139 | 617-453-7050
dglick@synapse-energy.com

PROFESSIONAL EXPERIENCE

Synapse Energy Economics Inc., Cambridge, MA. *Senior Principal*, May 2022 – Present; *Principal Associate*, June 2021 – May 2022; *Senior Associate*, April 2019 – June 2021; *Associate*, January 2018 – March 2019.

Conducts research and provides expert witness and consulting services on energy sector issues.

Examples include:

- Modeling for resource planning using PLEXOS and Encompass utility planning software to evaluate the reasonableness of utility IRP modeling.
- Modeling for resource planning to explore alternative, lower-cost and lower-emission resource portfolio options.
- Providing expert testimony in rate cases on the prudence of continued investment in, and operation of, coal plants based on the economics of plant operations relative to market prices and alternative resource costs.
- Providing expert testimony and analysis on the reasonableness of utility coal plant commitment and dispatch practice in fuel and power cost adjustment dockets.
- Serving as an expert witness on avoided cost of distributed solar PV and submitting direct and surrebuttal testimony regarding the appropriate calculation of benefit categories associated with the value of solar calculations.
- Reviewing and assessing the reasonableness of methodologies and assumptions relied on in utility IRPs and other long-term planning documents for expert report, public comments, and expert testimony.
- Evaluating utility long-term resource plans and developing alternative clean energy portfolios for expert reports.
- Co-authoring public comments on the adequacy of utility coal ash disposal plans, and federal coal ash disposal rules and amendments.
- Analyzing system-level cost impacts of energy efficiency at the state and national level.

Rocky Mountain Institute, Basalt, CO. August 2012 – September 2017

Senior Associate

- Led technical analysis, modeling, training and capacity building work for utilities and governments in Sub-Saharan Africa around integrated resource planning for the central electricity grid energy. Identified over one billion dollars in savings based on improved resource-planning processes.

-
- Represented RMI as a content expert and presented materials on electricity pricing and rate design at conferences and events.
 - Led a project to research and evaluate utility resource planning and spending processes, focusing specifically on integrated resource planning, to highlight systematic overspending on conventional resources and underinvestment and underutilization of distributed energy resources as a least-cost alternative.

Associate

- Led modeling analysis in collaboration with NextGen Climate America which identified a CO2 loophole in the Clean Power Plan of 250 million tons, or 41 percent of EPA projected abatement. Analysis was submitted as an official federal comment which led to a modification to address the loophole in the final rule.
- Led financial and economic modeling in collaboration with a major U.S. utility to quantify the impact that solar PV would have on their sales and helped identify alternative business models which would allow them to recapture a significant portion of this at-risk value.
- Supported the planning, content development, facilitation, and execution of numerous events and workshops with participants from across the electricity sector for RMI's Electricity Innovation Lab (eLab) initiative.
- Co-authored two studies reviewing valuation methodologies for solar PV and laying out new principles and recommendations around pricing and rate design for a distributed energy future in the United States. These studies have been highly cited by the industry and submitted as evidence in numerous Public Utility Commission rate cases.

The University of Michigan, Ann Arbor, MI. *Graduate Student Instructor*, September 2011 – July 2012

The Virginia Sea Grant at the Virginia Institute of Marine Science, Gloucester Point, VA. *Policy Intern*, Summer 2011

Managed a communication network analysis study of coastal resource management stakeholders on the Eastern Shore of the Delmarva Peninsula.

The Commission for Environmental Cooperation (NAFTA), Montreal, QC. *Short Term Educational Program/Intern*, Summer 2010

Researched energy and climate issues relevant to the NAFTA parties to assist the executive director in conducting a GAP analysis of emission monitoring, reporting, and verification systems in North America.

Congressman Tom Allen, Portland, ME. *Technology Systems and Outreach Coordinator*, August 2007 – December 2008

Directed Congressman Allen's technology operation, responded to constituent requests, and represented the Congressman at events throughout southern Maine.

EDUCATION

The University of Michigan, Ann Arbor, MI

Master of Public Policy, Gerald R. Ford School of Public Policy, 2012

Master of Science, School of Natural Resources and the Environment, 2012

Masters Project: *Climate Change Adaptation Planning in U.S. Cities*

Middlebury College, Middlebury, VT

Bachelor of Arts, 2007

Environmental Studies, Policy Focus; Minor in Spanish

Thesis: *Environmental Security in a Changing National Security Environment: Reconciling Divergent Policy Interests, Cold War to Present*

PUBLICATIONS

Addleton, I., D. Glick, R. Wilson. 2021. *Georgia Power's Uneconomic Coal Practices Cost Customers Millions*. Synapse Energy Economics for Sierra Club.

Glick, D., P. Eash-Gates, J. Hall, A. Takasugi. 2021. *A Clean Energy Future for MidAmerican and Iowa*. Synapse Energy Economics for Sierra Club, Iowa Environmental Council, and the Environmental Law and Policy Center.

Glick, D., S. Kwok. 2021 *Review of Southwestern Public Service Company's 2021 IRP and Tolk Analysis*. Synapse Energy Economics for Sierra Club.

Glick, D., P. Eash-Gates, S. Kwok, J. Taberner, R. Wilson. 2021. *A Clean Energy Future for Tampa*. Synapse Energy Economics for Sierra Club.

Glick, D. 2021. *Synapse Comments and Surreply Comments to the Minnesota Public Utility Commission in response to Otter Tail Power's 2021 Compliance Filing Docket E-999/CI-19-704*. Synapse Energy Economics for Sierra Club.

Eash-Gates, P., D. Glick, S. Kwok. R. Wilson. 2020. *Orlando's Renewable Energy Future: The Path to 100 Percent Renewable Energy by 2020*. Synapse Energy Economics for the First 50 Coalition.

Eash-Gates, P., B. Fagan, D. Glick. 2020. *Alternatives to the Surry-Skiffes Creek 500 kV Transmission Line*. Synapse Energy Economics for the National Parks Conservation Association.

Biewald, B., D. Glick, J. Hall, C. Odom, C. Roberto, R. Wilson. 2020. *Investing in Failure: How Large Power Companies are Undermining their Decarbonization Targets*. Synapse Energy Economics for Climate Majority Project.

Glick, D., D. Bhandari, C. Roberto, T. Woolf. 2020. *Review of benefit-cost analysis for the EPA's proposed revisions to the 2015 Steam Electric Effluent Limitations Guidelines*. Synapse Energy Economics for Earthjustice and Environmental Integrity Project.

Glick, D., J. Frost, B. Biewald. 2020. *The Benefits of an All-Source RFP in Duke Energy Indiana's 2021 IRP Process*. Synapse Energy Economics for Energy Matters Community Coalition.

Camp, E., B. Fagan, J. Frost, N. Garner, D. Glick, A. Hopkins, A. Napoleon, K. Takahashi, D. White, M. Whited, R. Wilson. 2019. *Phase 2 Report on Muskrat Falls Project Rate Mitigation, Revision 1 – September 25, 2019*. Synapse Energy Economics for the Board of Commissioners of Public Utilities, Province of Newfoundland and Labrador.

Camp, E., A. Hopkins, D. Bhandari, N. Garner, A. Allison, N. Peluso, B. Havumaki, D. Glick. 2019. *The Future of Energy Storage in Colorado: Opportunities, Barriers, Analysis, and Policy Recommendations*. Synapse Energy Office for the Colorado Energy Office.

Glick, D., B. Fagan, J. Frost, D. White. 2019. *Big Bend Analysis: Cleaner, Lower-Cost Alternatives to TECO's Billion-Dollar Gas Project*. Synapse Energy Economics for Sierra Club.

Glick, D., F. Ackerman, J. Frost. 2019. *Assessment of Duke Energy's Coal Ash Basin Closure Options Analysis in North Carolina*. Synapse Energy Economics for the Southern Environmental Law Center.

Glick, D., N. Peluso, R. Fagan. 2019. *San Juan Replacement Study: An alternative clean energy resource portfolio to meet Public Service Company of New Mexico's energy, capacity, and flexibility needs after the retirement of the San Juan Generating Station*. Synapse Energy Economics for Sierra Club.

Suphachalasai, S., M. Touati, F. Ackerman, P. Knight, D. Glick, A. Horowitz, J.A. Rogers, T. Amegroud. 2018. *Morocco – Energy Policy MRV: Emission Reductions from Energy Subsidies Reform and Renewable Energy Policy*. Prepared for the World Bank Group.

Camp, E., B. Fagan, J. Frost, D. Glick, A. Hopkins, A. Napoleon, N. Peluso, K. Takahashi, D. White, R. Wilson, T. Woolf. 2018. *Phase 1 Findings on Muskrat Falls Project Rate Mitigation*. Synapse Energy Economics for Board of Commissioners of Public Utilities, Province of Newfoundland and Labrador.

Allison, A., R. Wilson, D. Glick, J. Frost. 2018. *Comments on South Africa 2018 Integrated Resource Plan*. Synapse Energy Economics for Centre for Environmental Rights.

Hopkins, A. S., K. Takahashi, D. Glick, M. Whited. 2018. *Decarbonization of Heating Energy Use in California Buildings: Technology, Markets, Impacts, and Policy Solutions*. Synapse Energy Economics for the Natural Resources Defense Council.

Knight, P., E. Camp, D. Glick, M. Chang. 2018. *Analysis of the Avoided Costs of Compliance of the Massachusetts Global Warming Solutions Act*. Supplement to 2018 AESC Study. Synapse Energy Economics for Massachusetts Department of Energy Resources and Massachusetts Department of Environmental Protection.

Fagan, B., R. Wilson, S. Fields, D. Glick, D. White. 2018. *Nova Scotia Power Inc. Thermal Generation Utilization and Optimization: Economic Analysis of Retention of Fossil-Fueled Thermal Fleet to and Beyond 2030 – M08059*. Prepared for Board Counsel to the Nova Scotia Utility Review Board.

Ackerman, F., D. Glick, T. Vitolo. 2018. *Report on CCR proposed rule*. Prepared for Earthjustice.

Lashof, D. A., D. Weiskopf, D. Glick. 2014. *Potential Emission Leakage Under the Clean Power Plan and a Proposed Solution: A Comment to the US EPA*. NextGen Climate America.

Smith, O., M. Lehrman, D. Glick. 2014. *Rate Design for the Distribution Edge*. Rocky Mountain Institute.

Hansen, L., V. Lacy, D. Glick. 2013. *A Review of Solar PV Benefit & Cost Studies*. Rocky Mountain Institute.

TESTIMONY

Iowa Utilities Board (Docket No. RPU-2022-0001): Supplemental Direct and Rebuttal Testimony of Devi Glick. On behalf of Environmental Intervenors. November 21, 2022.

Public Utility Commission of Texas (PUC Docket No. 53719): Direct Testimony of Devi Glick in the application of Entergy Texas, Inc. for authority to change rates. On behalf of Sierra Club. October 26, 2022.

Virginia State Corporation Commission (Case No. PUR-2022-00051): Direct Testimony of Devi Glick in re: Appalachian Power Company's Integrated Resource Plan filing pursuant to Virginia Cost §56-597 *et seq.* On behalf of Sierra Club. September 2, 2022.

Public Service Commission of the State of Missouri (Case No. ER-2022-0129, Case No. ER-2022-0130): Surrebuttal Testimony of Devi Glick in the matter of Every Missouri Metro and Entergy Missouri West request for authority to implement a general rate increase for electric service. On behalf of Sierra Club. August 16, 2022.

Iowa Utilities Board (Docket No. RPU-2022-0001): Direct Testimony of Devi Glick in MidAmerican Energy Company Application for a Determination of Ratemaking Principles. On behalf of Environmental Intervenors. July 29, 2022.

Public Service Commission of the State of Missouri (Case No. ER-2022-0129, Case No. ER-2022-0130): Direct Testimony of Devi Glick in the matter of Every Missouri Metro and Entergy Missouri West request for authority to implement a general rate increase for electric service. On behalf of Sierra Club. June 8, 2022.

Virginia State Corporation Commission (Case No. PUR-2022-00006): Direct Testimony of Devi Glick in the petition of Virginia Electric & Power Company for revision of rate adjustment clause: Rider E, for the recovery of costs incurred to comply with state and federal environmental regulations pursuant to §56-585.1 A 5 e of the Code of Virginia. On behalf of Sierra Club. May 24, 2022.

Oklahoma Corporation Commission (Case No. PUD 202100164): Direct Testimony of Devi Glick in the matter of the application of Oklahoma gas and electric company for an order of the Commission authorizing application to modify its rates, charges, and tariffs for retail electric service in Oklahoma. On behalf of Sierra Club. April 27, 2022.

Public Utility Commission of Texas (PUC Docket No. 52485): Direct Testimony of Devi Glick in the application of Southwestern Public Service Company to amend its certifications of public convenience

and necessity to convert Harrington Generation Station from coal to natural gas. On behalf of Sierra Club. March 25, 2022.

Public Utility Commission of Texas (PUC Docket No. 52487): Direct Testimony of Devi Glick in the application of Entergy Texas Inc. to amend its certificate of convenience and necessity to construct Orange County Advanced Power Station. On behalf of Sierra Club. March 18, 2022.

Michigan Public Service Commission (Case No. U-21052): Direct Testimony of Devi Glick in the matter of the application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery Plan and Factors (2022). On Behalf of Sierra Club. March 9, 2022.

Arkansas Public Service Commission (Docket No. 21-070-U): Surrebuttal Testimony of Devi Glick in the Matter of the Application of Southwestern Electric Power Company for approval of a general change in rate and tariffs. On behalf of Sierra Club. February 17, 2022.

New Mexico Public Regulation Commission (Case No. 21-00200-UT): Direct Testimony of Devi Glick in the Matter of the Southwestern Public Service Company's application to amend its certifications of public convenience and necessity to convert Harrington Generation Station from coal to natural gas. On behalf of Sierra Club. January 14, 2022.

Public Utilities Commission of Ohio (Case No. 18-1004-EL-RDR): Direct Testimony of Devi Glick in the Matter of the Review of the Power Purchase Agreement Rider of Ohio Power Company for 2018 and 2019. On behalf of the Office of the Ohio Consumer's Counsel. December 29, 2021.

Arkansas Public Service Commission (Docket No. 21-070-U): Direct Testimony of Devi Glick in the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs. On behalf of Sierra Club. December 7, 2021.

Michigan Public Service Commission (Case No. U-20528): Direct Testimony of Devi Glick in the matter of the Application of DTE Electric Company for reconciliation of its power supply cost recovery plan (Case No. U-20527) for the 12-month period ending December 31, 2020. On behalf of Michigan Environmental Council. November 23, 2021.

Public Utilities Commission of Ohio (Case No. 20-167-EL-RDR): Direct Testimony of Devi Glick in the Matter of the Review of the Reconciliation Rider of Duke Energy Ohio, Inc. On behalf of The Office of the Ohio Consumer's Counsel. October 26, 2021.

Public Utilities Commission of Nevada (Docket No. 21-06001): Phase III Direct Testimony of Devi Glick in the joint application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their 2022-2041 Triennial Intergrade Resource Plan and 2022-2024 Energy Supply Plan. On behalf of Sierra Club and Natural Resource Defense Council. October 6, 2021.

Public Service Commission of South Carolina (Docket No, 2021-3-E): Direct Testimony of Devi Glick in the matter of the annual review of base rates for fuel costs for Duke Energy Carolinas, LLC (for potential increase or decrease in fuel adjustment and gas adjustment). On behalf of the South Carolina Coastal Conservation League and the Southern Alliance for Clean Energy. September 10, 2021.

North Carolina Utilities Commission (Docket No. E-2, Sub 1272): Direct Testimony of Devi Glick in the matter of the application of Duke Energy Progress, LLC pursuant to N.C.G.S § 62-133.2 and commission R8-5 relating to fuel and fuel-related change adjustments for electric utilities. On behalf of Sierra Club. August 31, 2021.

Michigan Public Service Commission (Docket No. U-20530): Direct Testimony of Devi Glick in the application of Indiana Michigan Power Company for a Power Supply Cost Recovery Reconciliation proceeding for the 12-month period ending December 31, 2020. On behalf of the Michigan Attorney General. August 24, 2021.

Public Utilities Commission of Nevada (Docket No. 21-06001): Phase I Direct Testimony of Devi Glick in the joint application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their 2022-2041 Triennial Intergrade Resource Plan and 2022-2024 Energy Supply Plan. On behalf of Sierra Club and Natural Resource Defense Council. August 16, 2021.

North Carolina Utilities Commission (Docket No. E-7, Sub 1250): Direct Testimony of Devi Glick in the Matter of Application Duke Energy Carolinas, LLC Pursuant to §N.C.G.S 62-133.2 and Commission Rule R8-5 Relating to Fuel and Fuel-Related Charge Adjustments for Electric Utilities. On behalf of Sierra Club. May 17, 2021.

Public Utility Commission of Texas (PUC Docket No. 51415): Direct Testimony of Devi Glick in the application of Southwestern Electric Power Company for authority to change rates. On behalf of Sierra Club. March 31, 2021.

Michigan Public Service Commission (Docket No. U-20804): Direct Testimony of Devi Glick in the application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery Plan and factors (2021). On behalf of Sierra Club. March 12, 2021.

Public Utility Commission of Texas (PUC Docket No. 50997): Direct Testimony of Devi Glick in the application of Southwestern Electric Power Company for authority to reconcile fuel costs for the period May 1, 2017- December 31, 2019. On behalf of Sierra Club. January 7, 2021.

Michigan Public Service Commission (Docket No. U-20224): Direct Testimony of Devi Glick in the application of Indiana Michigan Power Company for Reconciliation of its Power Supply Cost Recovery Plan. On behalf of the Sierra Club. October 23, 2020.

Public Service Commission of Wisconsin (Docket No. 3270-UR-123): Surrebuttal Testimony of Devi Glick in the application of Madison Gas and Electric Company for authority to change electric and natural gas rates. On behalf of Sierra Club. September 29, 2020.

Public Service Commission of Wisconsin (Docket No. 6680-UR-122): Surrebuttal Testimony of Devi Glick in the application of Wisconsin Power and Light Company for approval to extend electric and natural gas rates into 2021 and for approval of its 2021 fuel cost plan. On behalf of Sierra Club. September 21, 2020.

Public Service Commission of Wisconsin (Docket No. 3270-UR-123): Direct Testimony and Exhibits of Devi Glick in the application of Madison Gas and Electric Company for authority to change electric and natural gas rates. On behalf of Sierra Club. September 18, 2020.

Public Service Commission of Wisconsin (Docket No. 6680-UR-122): Direct Testimony and Exhibits of Devi Glick in the application of Wisconsin Power and Light Company for approval to extend electric and natural gas rates into 2021 and for approval of its 2021 fuel cost plan. On behalf of Sierra Club. September 8, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC125): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service. On behalf of Sierra Club. September 4, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC123 S1): Direct Testimony and Exhibits of Devi Glick in the Subdocket for review of Duke Energy Indian, LLC's Generation Unit Commitment Decisions. On behalf of Sierra Club. July 31, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC124): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service. On behalf of Sierra Club. June 4, 2020.

Arizona Corporation Commission (Docket No. E-01933A-19-0028): Rely to Late-filed ACC Staff Testimony of Devi Glick in the application of Tucson Electric Power Company for the establishment of just and reasonable rates. On behalf of Sierra Club. May 8, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC123): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service. On behalf of Sierra Club. March 6, 2020.

Public Utility Commission of Texas (PUC Docket No. 49831): Direct Testimony of Devi Glick in the application of Southwestern Public Service Company for authority to change rates. On behalf of Sierra Club. February 10, 2020.

New Mexico Public Regulation Commission (Case No. 19-00170-UT): Testimony of Devi Glick in Support of Uncontested Comprehensive Stipulation. On behalf of Sierra Club. January 21, 2020.

Nova Scotia Utility and Review Board (Matter M09420): Expert Evidence of Fagan, B, D. Glick reviewing Nova Scotia Power's Application for Extra Large Industrial Active Demand Control Tariff for Port Hawkesbury Paper. Prepared for Nova Scotia Utility and Review Board Counsel. December 3, 2019.

New Mexico Public Regulation Commission (Case No. 19-00170-UT): Direct Testimony of Devi Glick regarding Southwestern Public Service Company's application for revision of its retail rates and authorization and approval to shorten the service life and abandon its Tolk generation station units. On behalf of Sierra Club. November 22, 2019.

North Carolina Utilities Commission (Docket No. E-100, Sub 158): Responsive testimony of Devi Glick regarding battery storage and PURPA avoided cost rates. On behalf of Southern Alliance for Clean Energy. July 3, 2019.

State Corporation Commission of Virginia (Case No. PUR-2018-00195): Direct testimony of Devi Glick regarding the economic performance of four of Virginia Electric and Power Company's coal-fired units and the Company's petition to recover costs incurred to company with state and federal environmental regulations. On behalf of Sierra Club. April 23, 2019.

Connecticut Siting Council (Docket No. 470B): Joint testimony of Robert Fagan and Devi Glick regarding NTE Connecticut's application for a Certificate of Environmental Compatibility and Public Need for the Killingly generating facility. On behalf of Not Another Power Plant and Sierra Club. April 11, 2019.

Public Service Commission of South Carolina (Docket No. 2018-3-E): Surrebuttal testimony of Devi Glick regarding annual review of base rates of fuel costs for Duke Energy Carolinas. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. August 31, 2018.

Public Service Commission of South Carolina (Docket No. 2018-3-E): Direct testimony of Devi Glick regarding the annual review of base rates of fuel costs for Duke Energy Carolinas. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. August 17, 2018.

Public Service Commission of South Carolina (Docket No. 2018-1-E): Surrebuttal testimony of Devi Glick regarding Duke Energy Progress' net energy metering methodology for valuing distributed energy resources system within South Carolina. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. June 4, 2018.

Public Service Commission of South Carolina (Docket No. 2018-1-E): Direct testimony of Devi Glick regarding Duke Energy Progress' net energy metering methodology for valuing distributed energy resources system within South Carolina. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. May 22, 2018.

Public Service Commission of South Carolina (Docket No. 2018-2-E): Surrebuttal testimony of Devi Glick on avoided cost calculations and the costs and benefits of solar net energy metering for South Carolina Electric and Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. April 4, 2018.

Public Service Commission of South Carolina (Docket No. 2018-2-E): Direct testimony of Devi Glick on avoided cost calculations and the costs and benefits of solar net energy metering for South Carolina Electric and Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. March 23, 2018.

Resume updated August 2022

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**APPLICATION FOR APPROVAL OF EL PASO)
ELECTRIC COMPANY'S 2022 RENEWABLE ENERGY)
ACT PLAN PURSUANT TO THE RENEWABLE)
ENERGY ACT AND)
17.9.572 NMAC, AND SIXTH REVISED RATE NO. 38 -)
RPS)
COST RIDER)**

No. 22-00093-UT

CERTIFICATE OF SERVICE

I CERTIFY that on this date I sent, via email only, to the parties listed here a true and correct copy of the **Direct Testimony of Devi Glick:**

Nancy B. Burns Patricia Griego Linda Pleasant Curtis Hutcheson Jeffrey J. Wechsler Kari Olson Jocelyn Barrett-Kapin Yolanda Sandoval Teresa Pacheco Ricardo Gonzales Diana Luna Anastasia S. Stevens Jennifer Vega-Brown Gideon Elliot Keven Gedko Sydnee Wright Nann Winter Keith Hermann Jason Marks Kyle Smith Merrie Lee Soules Philip Simpson Cydney Beadles Cara Lynch Joan Drake Doug Gegax Devi Glick Sarah Shenstone-Harris	nancy.burns@epelectric.com; patricia.griego@epelectric.com; linda.pleasant@epelectric.com; curtis.hutcheson@epelectric.com; jwechsler@montand.com; kolson@montand.com; jbarrettkapin@montand.com; YSandoval@montand.com; tpacheco@montand.com; rico.gonzales@epelectric.com; dluna@montand.com; astevens.law@gmail.com; jvega-brown@las-cruces.org; gelliot@nmag.gov; kgedko@nmag.gov; swright@nmag.gov; nwinter@stelznerlaw.com; kherrmann@stelznerlaw.com; lawoffice@jasonmarks.com; kyle.j.smith124.civ@mail.mil; mlsoules@hotmail.com; philipbsimpson@comcast.net; Cydney.beadles@westernresources.org; lynch.cara.nm@gmail.com; jdrake@modrall.com ; dgegax@nmsu.edu; dglick@synapse-energy.com; sshenstone-harris@synapse-energy.com;	Fred Kennon Nelson Goodin Allen H. Downs Ed Rilkoff Bradford Borman Gloria Regensberg Elisha-Leyba-Tercero Marc Tupler Bamadou Ouattara John Bogatko David Black Peggy Martinez-Rael Elizabeth Ramirez Russell Fisk Ana Kippenbrock Angelica Anaya Allen	fredk@donaanacounty.org; nelsong@donaanacounty.org; biz@lifeisgood2.com; Ed.Rilkoff@prc.nm.gov; Bradford.Borman@prc.nm.gov ; Gloria.Regensberg@prc.nm.gov ; Elisha.Leyba-Tercero@prc.nm.gov ; Marc.Tupler@prc.nm.gov ; Bamadou.Ouattara@prc.nm.gov ; John.Bogatko@prc.nm.gov; David.Black@prc.nm.gov ; Peggy.Martinez-Rael@prc.nm.gov ; Elizabeth.Ramirez@prc.nm.gov ; Russell.Fisk@prc.nm.gov; Ana.Kippenbrock@prc.nm.gov ; Angelica.Allen@prc.nm.us
---	--	---	--

DATED this January 9, 2023.

/s/ Keven Gedko
Keven Gedko
Assistant Attorney General
(505) 303-1790
kgedko@nmag.gov