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PROFESSIONAL EXPERIENCE

Synapse Energy Economics Inc., Cambridge, MA.

Senior Consultant, July 2003 to Present

Consulting services to state and provincial energy regulators and public advocates, state provincial and national energy departments, and non-governmental organizations on regulatory policy, power supply procurement, electric industry restructuring, portfolio management, rate setting and rate design, economic impacts of efficiency and renewable generation programs, and other utility and energy topics. Expert witness services and litigation advice. Co-authored reports, journal articles and conference presentations on portfolio management, energy efficiency programs, and electric reliability.

Vermont Department of Public Service, Montpelier, VT.

Director for Regulated Utility Planning, 1986-2003

Preparation of long range policy plans in the areas of electric utilities, energy and telecommunications, including oversight of research, modeling, public input processes, policy analysis and writing. Development of policy positions and drafting of legislation and rules concerning utility resource planning, power supply acquisition, generation and transmission permitting, environmental costing, energy efficiency and alternative generation, utility restructuring and retail choice, distributed utility planning, rate setting and rate design, mergers, financing and acquisitions, decision analysis, power contract restructuring, Qualifying Facility contracts and permits, net metering, and other critical regulatory issues. Extensive expert testimony on those matters, as well as utility bankruptcy, prudence reviews, and critical utility policy matters. Extensive legislative testimony.

Planning Econometrician, 1981-1986

Energy demand forecasting, economic and demographic projections, economic and policy impact analysis, avoided cost estimates, and other quantitative analysis for utility and energy policy making. Development of State's basic policies regarding least cost planning and resource selection, including methods for evaluation of and program design for generation, transmission and demand-side options. Implementation of utility energy efficiency program requirements.

Vermont Agency of Human Services, Montpelier, VT.

Director of Planning, 1979-1981

Vermont Department of Social and Rehabilitation Services, Waterbury, VT.

Director of Planning and Evaluation, 1977-1979

Acting Deputy Commissioner, 1977

Vermont Department of Corrections, Montpelier, VT.

Director of Planning and Research, 1974-1977

Chief of Research and Statistics, 1973-1974

Pre-2004 Energy Consulting

Illinois Energy Office, 1986.
Massachusetts Executive Office of Energy Resources, 1986.
Northern Technology, Inc., Gorham, NH, 1983-1985.
James River Corporation, Green Bay, WI, 1985.
Newfoundland Department of Natural Resources, 1995

Teaching

University of Vermont, Burlington, Vt., 1977 to 1989
Adelphi University, Garden City, N.Y., 1980 to 1988
University of N. H., Complex Systems Ctr., Grad. Studies Comm., 1992-1994
Institute of International Education, Least Cost Planning Seminar, 1999
Community College of Vermont, 2002-2004

Miscellaneous

National Science Foundation Undergraduate Research Grant, 1965.
Wesleyan University Astronomy Prize, 1967.
Association for Criminal Justice Research (Northeast/Canada), Director, 1973 to 1981,
Secretary/Treas., 1973 to 1980.
University of Vermont Graduate Award in Statistics, May, 1980.
Contributing Editor, Current Index to Statistics, 1976-1985.
Chair, Session on Energy Economics, New England Business and Economics Association
Annual Meeting, 1983.
Member, Intl. System Dynamics Soc., Tau Beta Pi.
Northeast International Committee on Energy, New England Governors' Conference/Eastern Canadian Premiers,
various periods, 1986 to 2003
Director, Vermont Girl Scout Council, 1989-1991, 2000-2008; Secy., 1991-1997
3rd Vice President, Girl Scouts of the Green and White Mountains, 2009 to date
Editor, Intl. System Dynamics Soc. Bibliography, 1990-
Advisory Group Member, New England Project, MIT Analysis Group for Regional
Electricity Alternatives, 1991-1995.
Chair, Steering Committee & Modeling Subcommittee, New England Governors Conf.
Regional Energy Planning Project, 1991-1995.
Member, Montpelier School System Technology Steering Committee and Montpelier
High School Technology Committee, 1992-1993.
Reviewer, Vermont Experimental Program to Stimulate Competitive Research, 1993-
Invited Speaker, 3rd Intl. Conf. on Externality Costs, Ladenburg, FDR, 1995.
Member, Steering Committee, New England Governors Conference, Restructuring/
Environmentally Sustainable Technologies Project, 1996-1997
U. S. DOE Distributed Generation Collaborative, 2000-2003
Justice of the Peace, Montpelier, Vermont, 2007–

EDUCATION

Degrees

B.A., Physics, Wesleyan University, Middletown, CT, 1970
M.S., Statistics, University of Vermont, Burlington, VT, 1980
Ph.D., Mechanical Engineering, University of Vermont, Burlington, VT, 1988

Continuing Education

Seminar in Electricity and Telecommunications Demand, 1981
Advanced Workshop in Regulation and Public Utility Economics, June, 1982 and
June, 1983, Rutgers University
Transmission Reliability Assessment, Power Technologies, Inc., 1986
Regional Forecasting and Simulation Modeling, January, 1991, U. Massachusetts-Amherst

TESTIMONY and AFFIDAVITS

Vermont Public Service Board

On behalf of the Vermont Department of Public Service:

Docket 4661 - Green Mountain Power Rate Increase
Dockets 5009/5112 - Vt. Electric Coop. Rate Increase
Dockets 5108/5109 - Vt. Marble Co. Small Power Rate
Docket 5133 - Moretown Hydro Energy Co. Small Power Rate
Docket 5202 - VPPSA Refinancing
Docket 5248 - DPS Ontario Hydro Power Purchase
Docket 5270 - Least Cost Planning and Demand-Side Management
Docket 5270-GMP-1 - Highgate Apartments Fuel Switching
Docket 5270-CV-1&3 - Demand-Side Management Preapproval and Ratemaking Principles
Docket 5270-CV-4 - IRP
Docket 5270-VGS-1 - Demand-Side Management Preapproval
Docket 5270-WEC-1 - Demand-Side Management Preapproval
Dockets 5270-BRTN-1, 5270-CUC-3, 5270-HDPK-1, 5270-JHNS-1, 5270-JKSN-1,
5270-LDLW-1, 5270-LYND-1, 5270-MRSV-1, 5270-ORLN-1, 5270-RDSB-1,
5270-ROCH-1, 5270-STOW-1, 5270-SWNT-1, 5270-VMC-1 - IRP's
Docket 5270-VGS-2 - Demand-Side Management Preapproval
Docket 5277 - DPS Ontario Hydro Transactions Agreement
Docket 5330A - Hydro Quebec Power Purchase
Docket 5330E - Hydro Quebec Power Purchase, Waiver and Amendment
Docket 5372 - CVPSC Rate Increase
Docket 5491 - CVPSC Rate Increase
Docket 5630/32 - VEC Debt Restructuring & Rate Increase
Docket 5634 - NET Toll Dialing Plan
Docket 5638 - CVPSC Mack Molding*
Docket 5664 - EPACT Standards
Docket 5810/11/12 - VEC Debt Restructuring & Rate Increase
Docket 5825 - Ludlow IRP - externalities
Docket 5826 - Vermont Marble Electric Division - IRP - externalities

Docket 5832 - Lyndonville IRP - externalities
Docket 5841/5859 - Citizens Utilities Prudence Review & Revocation Petition
Docket 5854 - Electric Restructuring*
Docket 5857 - GMP Rate Increase*
Docket 5971 - VEC Bankruptcy Reorganization*
Docket 5980 - Proposal for Statewide Efficiency Utility
Docket 5983 - GMP Rate Increase (HQ Issues)
Docket 6018 - CVPSC Rate Increase (HQ Issues)
Docket 6107 - GMP Rate Increase (HQ Issues)
Docket 6140 - Electric Industry Restructuring (various presentations)*
Docket 6033/6053/6110/6142/6158/6326/6327/6371/6462/6464 - various municipal electric rate increases*
Docket 6270 - Qualifying facility contract reform
Docket 6290 - Distributed Generation*
Docket 6300 - Sale of Vermont Yankee
Docket 6330 - Petition of CVPSC and GMP on Restructuring (various presentations)*
Docket 6149/6315 - WEC electric rate increases* (HQ and Settlement Issues)
Docket 6460 - CVPSC Rate Increase (HQ Issues)
Docket 6495 - Vermont Gas Systems Rate Increase (Deferral Account and Hedging)
Docket 6565 - Various station service contracts
Docket 6596 - CUC rate Increase (HQ Issues)
Docket 6758 - Fourteen Utilities - Violations of Statutes on Special Contracts and Special Rates—Phases I & II
For consulting clients:
Docket 6958 - Green Mountain Power Rate Design - for AARP
Docket 6958 - Green Mountain Power Rate Design - for Conservation Law Foundation
Docket 6958 - Green Mountain Power Rate Design - for Conservation Law Foundation
Docket 7085 – CVPS Street Lighting Tariff – for Village of Woodstock
Docket 7175 - Green Mountain Power Rate Design – for Conservation Law Foundation and AARP
Docket 7176 - Green Mountain Power Alternative Regulation Plan—for Conservation Law Foundation and AARP
Docket 7336 – CVPS Alternative Regulation Plan – for Conservation Law Foundation*
Docket 7466—Efficiency Utility Structure—for Conservation Law Foundation
Docket 7670—20 Utilities Petition to Purchase Power from Hydro Québec US— for Conservation Law Foundation

Vermont State Environmental Board

Docket 5W0584-EB - Developers Diversified Land Use Permit

Federal Energy Regulatory Commission

Docket Nos. ER95-1586-000 and EL96-17-000 - Citizens Utilities Company **

California Public Utilities Commission

Multi-Stakeholder Study of Alternatives to the Mohave Generating Plant Pursuant to CPUC Decision 04-12-016 - for Southern California Edison (February 2006) *

R.06-02-013 – Long Term Procurement Plans of PG&E, SCE and SDG&E&E – for the Division of Ratepayer Advocates (March 2007)

Connecticut Department of Public Utility Control

Docket No. 03-07-16 - Alternative Transitional Standard Offer (live testimony Dec. 2004, prefiled comments Jan. 2003) *

Delaware Public Service Commission

Docket No. 04-391 – Standard Offer Service – for the Commission Staff (live testimony October 2006)

District of Columbia Public Service Commission

Formal Case 1047 – Investigation into the Structure of the Procurement Process for Standard Offer Service – for the District Office of People’s Counsel (June 2006 to date) **

Florida Public Service Commission

Dockets 080407 through 080413-EG – Commission Review of Numeric Conservation Goals – for the Southern Alliance for Clean Energy and the Natural Resources Defense Council (August 2009)

Illinois Commerce Commission

Docket No. 05-0159 - Commonwealth Edison Basic Utility Service Procurement

Docket No. 05-0160, 0161 and 0162 - Ameren CILCO, AmerenCIPS, and AmerenIP - Basic Utility Service Procurement

Indiana Utility Regulatory Commission

CAUSE NO. 42598 - Vectren North - Gas cost rate making mechanism and demand side management programs (Sept. 2004)

CAUSE NO. 42612 - Public Service of Indiana - demand side management programs (Sept. 2004)

Massachusetts Department of Public Utilities

Docket 07-050 – Investigation into Rate Structures that will Promote Efficient Deployment of Demand Resources – for The Energy Consortium (June 2007) *

Mississippi Public Service Commission

Docket 2008-AD-158 – Proceeding to Review Statewide Electric Generation Needs – for The Sierra Club (June 2008)

Docket 2008-AD-477— Docket to Consider Standards Established by the Energy Independence and Security Act of 2007, Section 111(d) of Public Utility Regulatory Policy Act (16 U.S.C. § 2621)—for The Sierra Club (November 2009) *

New Hampshire Public Utilities Commission

Docket DE 07-064 – Revenue Decoupling Investigation – for Conservation Law Foundation (May 2007 to date) *

Ohio Public Utilities Commission

Restructuring Roundtable – System Benefit Charges - Commission workshop presenter *

Case No. 09-906-EL-SSO—Competitive Bidding Process—for Ohio Consumers’ Counsel (December 2009)

Oklahoma Corporation Commission

Cause No. RM 2007-007 – Demand Side Management Rulemaking – for The Sierra Club and the Oklahoma Sustainability Network (May 2008) *

South Carolina Public Service Commission

DOCKET NO. 2009-261-E—SCE&G DSM filing—for Southern Environmental Law Center and the South Carolina Coastal Conservation League (January 2010) (testimony filed—settlement approved)

U.S. District Court for the District of Vermont

Civ. No. 2:03-cv-279 – Circumferential Highway Impact Analysis – for Vermont Public Interest Research Group, Inc., Friends of the Earth, Inc., Conservation Law Foundation, and The Sierra Club (January 2004) **

Virginia State Corporation Commission

Docket # PUE-2009-00023 – Conservation and demand response targets – the Southern Environmental Law Center, Appalachian Voices, Chesapeake Climate Action Network and the Virginia Chapter of the Sierra Club (September 2009)

Docket # PUE-2009-00081 – Demand Side Management Program Approvals – the Southern Environmental Law Center, Appalachian Voices, Chesapeake Climate Action Network and the Virginia Chapter of the Sierra Club (December 2009)

Docket # PUE-2009-00096 – Dominion IRP – the Southern Environmental Law Center, Appalachian Voices, Chesapeake Climate Action Network and the Virginia Chapter of the Sierra Club (February 2010)

Docket # PUE-2009-00097 – APCo IRP – the Southern Environmental Law Center, Appalachian Voices, Chesapeake Climate Action Network and the Virginia Chapter of the Sierra Club (March 2010) (testimony filed pending hearing)

Wyoming Public Service Commission

Docket No. 20000-384-ER-10 – Rocky Mountain Power rate case – Powder River Basin Resource Council (April 2011)

* No prefiled testimony

** Affidavit only

PUBLICATIONS

Allen, R., V. L. McCarren and W. Steinhurst. *Vermont Telecommunications Plan: Final Draft and Final*. Vt. DPS, 1992.

Backus, G., J. Amlin, W. Steinhurst and P. Cross. *Champlain Pipeline Project: Energy and Economic Systems – Assessment*. Vt. DPS, 1989.

Bartels, C., R. Squires, and W. Steinhurst. *Electric Power Supply in Vermont*. Vt. DPS, 1983.

Biewald, B., C. Chen, A. Sommer, W. Steinhurst and D. E. White. *Comments on the RPS Cost Analyses of the Joint Utilities and the DPS Staff*. Synapse Energy Economics report for Renewable Energy Technology and Environment Coalition. September 19, 2003.

Biewald, B., Woolf, T., Roschelle, A., & Steinhurst, W. (2003) *Portfolio Management: How to Procure Electricity Resources to Provide Reliable, Low-Cost, and Efficient Electricity Services to All Retail Customers*. Synapse Energy Economics report for NARUC. October 10, 2003.

Blomberg, L., B. Hausauer, and W. Steinhurst, et al., *Fueling Vermont's Future: Comprehensive Energy Plan and Greenhouse Gas Action Plan: Public Review Draft*. Vt. DPS, 1997 and *Final*, 1998.

Copp, L., W. Steinhurst, et al. *Electric Power Issues in Vermont*. Vt. DPS, 1982.

----- *Electric Power in Vermont: Statistical Sourcebook*. Vt. DPS, 1982.

----- *Electric Power in Vermont: Twenty-Year Plan*. Vt. DPS, 1983.

Copeland, R. and W. Steinhurst. *Private Sector Day Care Rates*. Vt. Dept. of SRS, 1979.

Huffman, B., W. Steinhurst, et al., *Energy Use in Vermont and the Public Interest*. Vt. DPS, 1984.

Parker, S., & Steinhurst, W. (2004). *How To Deliver the (Efficiency) Goods: Why an Independent Third Party Works Best and How To Make Sure It Works Well*. Synapse Energy Economics, Inc.

Roschelle, A., Steinhurst, W., Peterson, P., & Biewald, B. (2004). Procuring Default Service: Relationships between Contract Duration and Contract Price (pp. 15). ME PUC. On behalf of ME Office of Public Advocate. May 21, 2004.

Roschelle, A., Steinhurst, W., Peterson, P., & Biewald, B. (2004). *Long Term Power Contracts: The Art of the Deal*. Public Utilities Fortnightly (August), 56-74.

Roschelle, A., & Steinhurst, W. (forthcoming). *Best Practices in Procurement of Default Electric Service: A Portfolio Management Approach*. Electricity J.

Schwartz, L., and W. Steinhurst. Is it smart if it's not clean? Questions Regulators Can Ask About Smart Grid and Energy Efficiency, Part one: Strategies for utility distribution systems. Regulatory Assistance Project *Issueletter* prepared for U.S. Environmental Protection Agency. May 2010.

Shapiro, W., W. Steinhurst, et al. *Vermont Telecommunications Plan: Final Draft*. Vt. DPS, Aug. 1996 and *Final*, Dec. 1996.

----- *Vermont Telecommunications Plan: Final Draft*. Vt. DPS, 1999 and *Final*, 2000.

Steinhurst, W., *Hypothesis Tests for Parole Survival Analysis*. Masters thesis, University of Vermont, May, 1980.

----- *Residential Price Elasticity of Electric Demand in the Northeast*, Vt. DPS, 1982.

----- *Long Range Forecast of Electric Loads for Vermont*. Vt. DPS, 1983.

----- *Electricity Conservation in Vermont*. Vt. DPS, 1983.

----- *Twenty Year Electric Plan: Public Review Draft*. Vt. DPS, 1987, and *Final*, 1988.

----- *Twenty Year Electric Plan: Public Review Draft*. Vt. DPS, Mar. 1994, and *Final*, Dec. 1994.

----- *On Some Aspects of the Thermoplastic in Engineering*. Ph.D. Dissertation. Univ. of Vermont, 1988.

----- *Electricity at a Glance*. National Regulatory Research Inst., 2008.

----- *Electricity at a Glance, Rev. Ed.* National Regulatory Research Inst., 2011.

Steinhurst, W. *Social Priorities under Restructuring: Coordinated and Comprehensive Delivery*. Paper presented at the Standard Offer Service Conference, Wilmington, DE. August 6, 2004.

-----, et al. *Vermont Comprehensive Energy Plan*. Vt. DPS, 1991.

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- , et al. "Electric System benefits of clean Energy." Ch. 3 in U.S. Environmental Protection Administration, *Assessing the Multiple Benefits of Clean Energy: A Resource for States*. Feb. 2010.
- , R. Allen, et al. *Shutdown Assessment of the Vermont Yankee Nuclear Power Facility: Interim Report*. Vt. DPS, 1987.
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- , et al. *A Field Assessment of the Vermont Low-Income Weatherization Program*. Vt. DPS, 1990
- , et al. *Vermont Comprehensive Energy Plan*. Vt. DPS, 1991.
- , et al. *Vermont Government 2000 Conference Report*. 1989.
- Steinhurst, W., Woolf, T., & Roschelle, A. (2004). *Energy Efficiency: Still an Cost-Effective Resource Option*. Paper presented at the USAEE/IAEE Conference, Washington, D.C.
- Steinhurst, W., Chernick, P., Woolf, T., Plunkett, J., & Chen, C. (2003). OCC Comments on Alternative Transitional Standard Offers (pp. 58). CT DPUC Docket 03-07-16 on behalf of CT OCC.
- and D. Lamont. *Building Energy Code Study*. Vt. DPS, 1985.
- and D. Lamont. *Guide to Evaluating Energy Conservation Opportunities*. Vt. DPS, 1985.
- and B. Patterson. *Weeks School Recidivism Study*. Vt. Corrections Dept., 1976.
- and N Perrin. *1977-78 High School Survey: Patterns of Substance Use*. Vt. Dept. of SRS, 1979.
- , N. Perrin, and A. Jette. *Running in the SRS Juvenile System: 1975 - 1979*. Vt. Det. of SRS, 1979.
- and T. Weaver. *Long Range Forecast of Electric Loads for Vermont*. Vt. DPS, 1986.
- Stoneman, K., and W. Steinhurst. *Comprehensive Proposal for Corrections in Vermont*. Vt. Corrections Dept., 1972.
- von Turkovich, B., and W. Steinhurst. "Plastic Flow Localization and Instability in Metal Processing." *Proc. 14th N. Amer. Manuf. Res. Conf.*, Minneapolis, May, 1986, pp. 340-347.
- White, D., Roschelle, A., Peterson, P., Schlissel, D. A., Biewald, B., & Steinhurst, W. (forthcoming). *The 2003 Blackout: Solutions that Won't Cost a Fortune*. Electricity J.
- Wilson, D., J. O'Rourke, W. Steinhurst, et al. *Welfare Reform: A Vermont Perspective*. Vt. AHS, 1980.

ARTICLES AND PRESENTATIONS

- Andersen, D., G. Richardson, J. Rohrbaugh, S. Ratanawijitrasin, W. Steinhurst. "Group Model Building. *Proceedings of the International System Dynamics Conference*. Intl. System Dynamics Soc., 1992.
- Biewald, B., Chernick, P., and W. Steinhurst. *Environmental Externalities: Highways and Byways*. Proc. NARUC IRP Conf., Kalispell, MT, 1994.
- Hamilton, B., L. Milford, S. Parker and W. Steinhurst, "Fuel Switching in Vermont: Issues and Experiences." *Proc. of ACEEE 1992 Summer Study on Energy Efficiency in Buildings*, 12 pp.
- Hogan, C., and W. Steinhurst. "Managing Change in Corrections." *Federal Probation*, June, 1976.

Steinhurst, W., "Hypothesis Tests for Limited Failure Survival Distributions." *Proc. Social Statistics Section*, American Statistical Association, 1980, pp. 521 - 524.

----- "Hypothesis Tests for Parole Survival Analysis." *Evaluation Review*, 5, 699-711 (1981).

----- "Don't Throw Out the Baby: Some Design Requirements for Federalism Reform." *New England Journal of Human Services*, 1, 41 - 45 (1981).

----- "Environmental Externalities: Analysis and Advocacy." *Proc. 3rd Intl. Conf. on Externality Costs*, Springer-Verlag: Berlin.

----- and G. Backus. "Application of System Dynamics to an Integrated Economic and Environmental Policy Assessment." In D. F. Andersen, et al., *System Dynamics '90, Proc. of the 1990 International System Dynamics Conf.*, Boston, MA., pp. 1060-1074.

----- and W. Merten. "Statistical Analysis of Thermal Shock Tests." *Statistics in Manufacturing*, S. G. Kapoor and M. R. Martinez, eds., ASME Proc., PED-9 (83), 51-56.

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----- and R. Squires. *Electric Utility Cost of Service Projections for James River Corporation New England Mills: 1984 to 2000*. Northern Technology, Inc., Jefferson NH, 1985.

----- and B. von Turkovich. "Material Influences on Plastic Flow Localization and Instability in Metal Processing." *Proc. 2nd Intl. Conf. on Technology of Plasticity*, Stuttgart, 1987.

Resume dated April 2011.

San Juan Environmental Upgrade Project

Component	Expenditure
Pulse Jet Filter Fabric Baghouses	\$ 134,628,946
Activated Carbon Injection and Continuous Emission Monitors	\$ 3,973,015
SO2 Removal System Upgrade	\$ 14,695,476
NOx Combustion Controls	\$ 6,817,604
Retirement Work Orders	\$ 772,003
Total, Excluding AFUDC	\$ 160,887,044



WRI FACT SHEET

Response to EEI's Timeline of Environmental Regulations

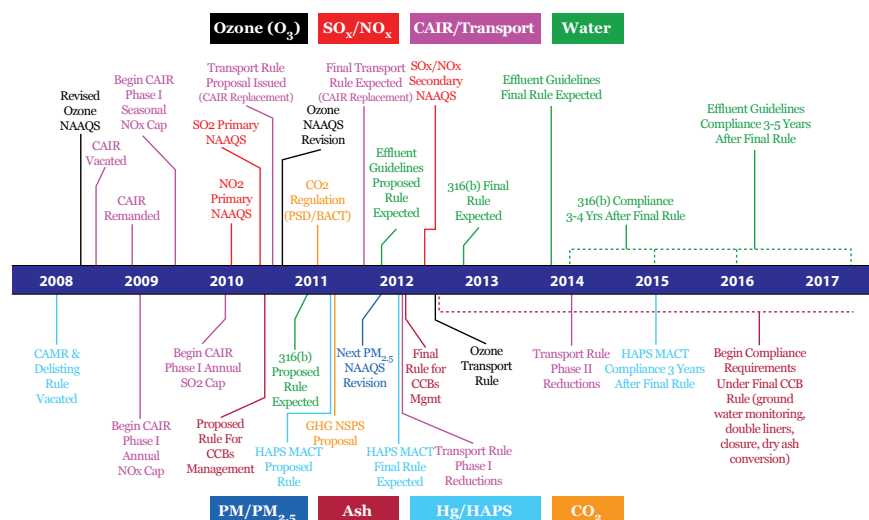
After years of delay, EPA gets back on track in issuing rules that provide a path to a cleaner power fleet.

After years of delay, the Environmental Protection Agency (EPA) is working to reduce dangerous and toxic pollutants released to the air and water by electric power plants, as required by the Clean Air Act and other statutes. Four key points about EPA's actions are clear:

- **Contrary to assertions by industry groups, EPA is pursuing a realistic timeline over the next decade to bring the electric power industry into compliance with the law.**
- **In most cases the electric power sector has been on notice for several years (in some cases several decades) that these pollutants would be regulated.**
- **Without new regulations, these pollutants will continue to impair America's waterways, heat the planet, perpetuate acid rain, and lead to preventable hospital visits and premature deaths.**
- **In each of its rulemakings, EPA provides for an extensive, open public process based on evidence. This leads to more robust and fair rules for the electric power sector. As EPA finalizes each rule, it will establish an increasingly clear pathway for investments in an American electric generation fleet for the 21st century.**

CEOs and other representatives of major electric power corporations have frequently suggested that EPA's regulatory timeline is unworkable.¹ The largest industry trade group, the Edison Electric Institute (EEI) has produced a slide that purports to display an onslaught of new requirements for

FIGURE 1: POSSIBLE TIMELINE FOR ENVIRONMENTAL REGULATORY REQUIREMENTS FOR THE UTILITY INDUSTRY



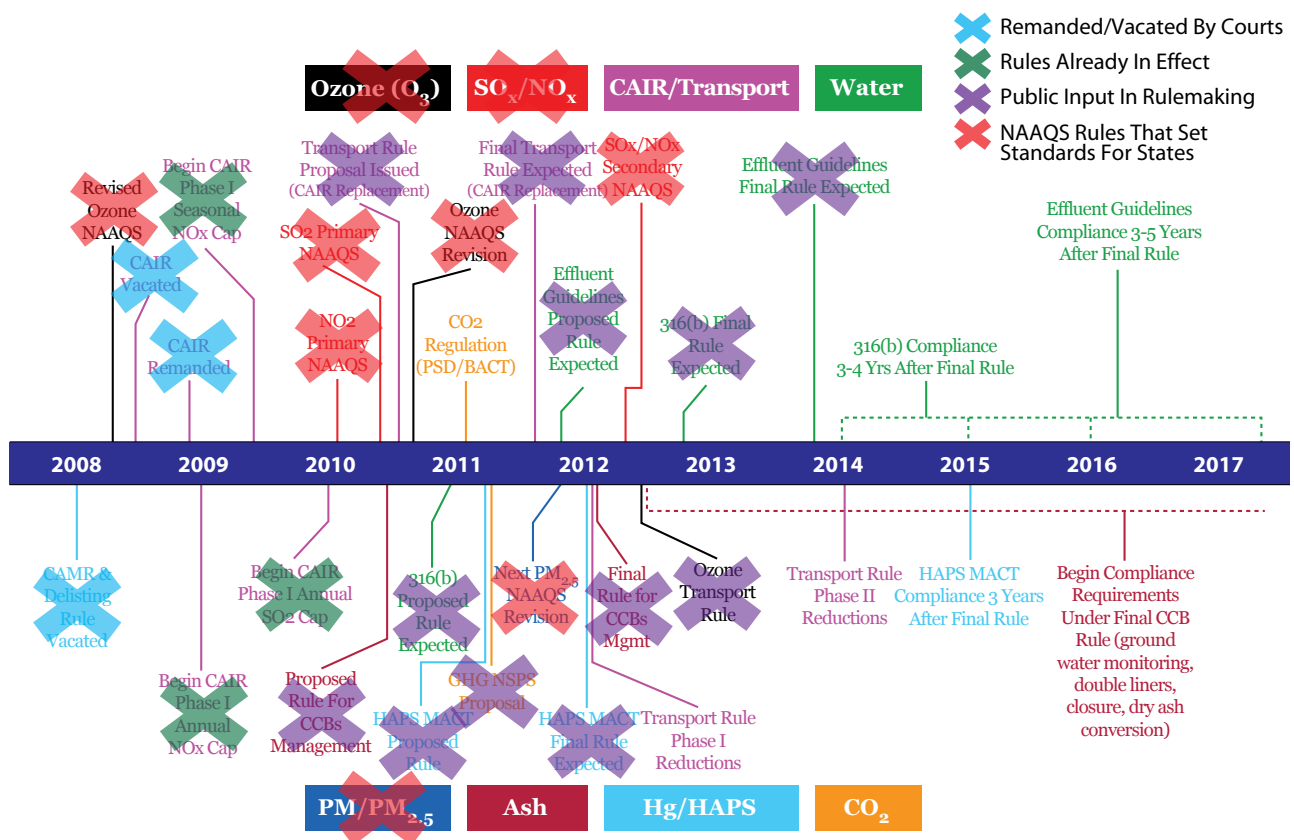
power plants.² EEI has been distributing this slide widely on Capitol Hill where it presumably hopes to win lawmakers' support for additional delays in EPA regulation or even a stripping of EPA's authority.

The EPA regulatory process is far from a "train wreck." EEI's misleading timeline reproduced in Figure 1, mostly consists of procedural events and activities that will not impose a direct compliance obligation on power plants. This serves only to spread confusion about EPA's actual regulatory schedule.

WRI has identified four categories of EPA activities on the EEI timeline that are potentially misleading. When these activities are removed, only the timing of actual new compliance obligations is left. In figure 2, "X"s (color coded for each filter in the screening process) have been applied to remove events from the figure that are not consequential from a compliance standpoint. The screening filters are as follows:

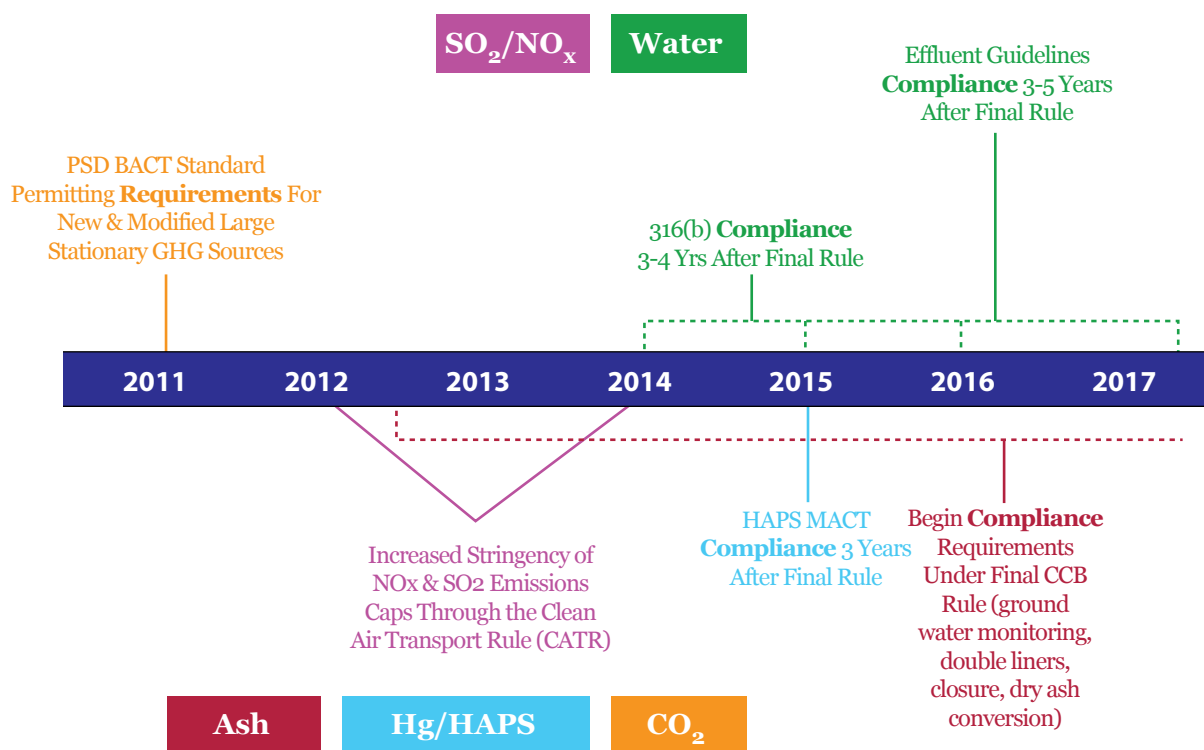
1. Rules that have been remanded or vacated by court decisions that do not impose compliance obligations. 
2. Rules that are already in effect representing compliance obligations that already exist; there are no new requirements imposed by these rules. 
3. Public input through the rulemaking process (leads to more robust and fair rules for the electric power sector, and should not be conflated with new compliance obligations). 
4. National Ambient Air Quality Standard (NAAQS) rules for various pollutants that set standards for states to achieve. They do not establish new requirements for electric generation units.³ 

FIGURE 2: ENVIRONMENTAL REGULATORY REQUIREMENTS FOR THE UTILITY INDUSTRY, REMOVING ALL BUT NEW COMPLIANCE OBLIGATIONS



Sources: WRI Analysis based on Edison Electric Institute 2010, Wegman, EPA 2003.

FIGURE 3: REGULATORY COMPLIANCE OBLIGATIONS FOR THE UTILITY INDUSTRY



Sources: WRI Analysis based on Edison Electric Institute 2010, Wegman, EPA 2003.

Figure 3 shows a more accurate picture of the timeline for new requirements applicable to electric power plants.

EPA is carrying out the intent of Congress (through the passage of the bipartisan Clean Air Act and subsequent amendments) to clean the nation's air and water. These rules can help the United States transition to cleaner and more efficient power plants, by establishing a clear pathway for investments in an electric generation fleet for the 21st century.

The CAA requires EPA and states to regulate and reduce harmful pollutants from major emissions sources including power plants. To date, this framework has delivered substantial improvements in air quality and significant public health benefits estimated between \$77 and \$519 billion annually.⁴ Over the next decade, power plants will be subject to new rules under the CAA as well as the Clean Water Act (CWA) and the Resource Conservation and Recovery Act (RCRA) to control substances that cause serious health problems and substantial damage to America's natural resources. These rules will take effect after long lead times. In most cases industry has been on notice for years that these pollutants would be regulated.

The electric power sector has had substantial notice—in some cases for decades—that power plants would be subject to regulations to control dangerous pollutants

Half of the regulations under consideration by EPA have been in the regulatory pipeline for over a decade. Due to administrative delays and litigation resulting in court decisions remanding or vacating previous rules, many of these rules have not been finalized or the final rules were reversed. In many cases Congress has set statutory deadlines for EPA to act, EPA has missed the deadlines, and courts have ordered EPA to act. Table 1 outlines the amount of time the electric sector has had to prepare for new regulations.

The case of mercury from power plants provides a good example of how much regulatory lag time there has been for the electric power industry to prepare for new pollutant rules. The CAA required EPA to study mercury and other hazardous air pollutant (HAP) emissions from electric power plants and determine whether or not regulating these emissions would be necessary and appropriate. In 2000, EPA determined that regulations were appropriate effectively putting the electric power industry on notice that controls on mercury would be required. EPA then proposed and finalized rules (including the Clean Air Mercury Rule) that were ultimately vacated by the courts, which found that EPA had not acted within the constraints of the CAA. EPA now intends to issue revised draft and final rules in accordance with CAA requirements in 2011. Compliance obligations would take effect in 2015.

TABLE 1. REGULATORY LAG TIME OF MAJOR POLLUTANT RULES

Pollutant	Notice that new or more stringent rules would be imposed ⁵	Year in which compliance obligations will be imposed ⁶	Regulatory lag time	Comments
Mercury	2000	2015	15 years	After a study required by statute and subject to public review, EPA found in 2000 that it was “necessary and appropriate” to regulate mercury and other pollutants from power plants as HAPs
SO ₂ and NO _x	1990 for initial rules. 2003 for increased stringency of rules.	Initially in 1995 for SO ₂ with increasing stringency beginning in 2010 (for SO ₂) and again in 2012. Technology standards for NO _x were first imposed in 1995, Northeast NO _x cap started in 1999; initial expansion in 2003, and then again in 2009	5 years for initial rules. 6–7 years for more stringent rules	New rules for SO ₂ and NO _x represent increasing stringency under existing frameworks.
Greenhouse Gases (GHGs)	2009 (December)	2011	13 months	EPA found that GHGs endanger public health and welfare. EPA rules to regulate GHGs from light-duty vehicles take effect on January 2, 2011, the CAA requires BACT for a pollutant once it is subject to regulation under the Act.
Coal Combustion Residuals (CCR, or Coal Ash)	2007 EPA Notice of Data Availability solicited initial reactions to EPA data.	No sooner than mid-2012, requirements phased in	At least 3 years	Initial requests for information were initiated in 2007, signaling the intention to regulate. Depending on EPA final rules timetables for compliance will vary.
Cooling water intake	1972	No sooner than 2014. Requirements are incorporated permit by permit, which could take up to 5 years	38 years	The CWA amendments of 1977 require these regulations but no final rule has been implemented due to delay and court orders
Power plant effluent	1982 CWA mandates periodic review of existing regulations for potential update.	2015 Final rule not expected before 2012. Requirements are incorporated permit by permit, which could take up to 5 years	23 years	Effluent guidelines are required to be reviewed periodically. The last update was in 1982.
Note: Regulatory lag time is calculated from the date that it was made clear under statutory requirements and court decisions that new or more stringent rules would be pursued relative to the current expected date that compliance will be required.				

Thus, the electric power industry has had 15 years to prepare, from the determination in 2000 to the expected date of compliance obligations in 2015.

FINALIZING REGULATIONS PROVIDES CERTAINTY

Finalizing regulations removes uncertainty that might otherwise stymie new investments. The ultimate stringency and compliance obligations for most of the regulations EPA is pursuing will remain uncertain until rules are final. The statutes — RCRA, CWA and the CAA — establish which pollutants will be subject to regulation and the relevant legal standards; the specifics are established during the EPA rulemakings. The longer it takes EPA to finalize new pollutant rules, the longer plant operators face uncertainty as to what will be required.

NOT ALL EPA ACTIONS WILL CREATE NEW REGULATORY REGIMES

It is important to note that some EPA rules do not constitute new regulatory programs. For example, sulfur dioxide (SO₂) emissions from power plants have been covered by cap-and-trade programs that began in 1995. Nitrogen oxides (NO_x) emissions were the subject of a cap-and-trade program covering plants in the eastern half of the country since at least 2003. The Clean Air Interstate Rule and its successor, the Transport Rule, extend NO_x cap-and-trade to new states and increase the stringency of requirements for units already subject to the cap-and-trade for NO_x and SO₂. Power plant operators are familiar with these regulatory frameworks and are familiar with their operation. While increasing the stringency of these rules may require additional investments in control strategies, there is no fundamentally new requirement in play.

THE EPA REGULATORY PROCESS PROVIDES OPPORTUNITIES FOR INDUSTRY INPUT

There are few, if any surprises in the very public and largely transparent EPA regulatory process. Multiple events must take place before any actual compliance obligation is imposed on an electric power plant or any other regulated entity. The EPA must issue proposed rules and seek public comment. Some rulemakings are initiated with advanced notices of proposed rulemaking, so that the process has extra opportunities for industry and public comment, and some start with studies that are conducted with public input and comment. This process allows the electric power industry to have substantial input into the shape of new regulations and allows the industry to better understand what may be required of them by EPA when rules are finalized. Fears of agency overreach are misplaced given the built-in limitations on EPA's authority contained in the CAA.⁷

Often rules are litigated; one outcome can be to send the rule back to EPA for further work. Many of EPA's rules are issued on schedules established by the federal courts — because EPA has already missed the statutory deadline for promulgation. Only the final rule imposes a direct compliance obligation — after which there are practical implications for power plant owners and operators as they make investments in their generation fleets.

WHY IS EPA REGULATING POWER PLANTS AT ALL?

EPA is responding to direction from Congress to reduce the human health and environmental effects of mercury (as well as other HAPs), SO₂, NO_x, greenhouse gases (GHGs), coal ash, cooling water intake and discharge, industrial water effluent. Mercury is a neurotoxin that causes brain damage. SO₂ and NO_x cause acid rain, regional haze and can cause or worsen asthma and aggravate cardio-pulmonary disease leading to increased hospital visits and premature death. A recent example of the dangers of coal ash was the major spill of ash at the Tennessee Valley Authority's Kingston plant in 2008 where irresponsible containment of coal ash caused waterways and communities to be inundated with waste.⁸ Electric power plants are major sources of many pollutants that EPA is regulating or intends to regulate.

Electric power plants are a major source of pollutants that substantially contribute to ongoing public health and environmental problems that impose real costs to the economy. When just air pollutants are considered, electric power plants represent the following shares of total U.S. emissions in 2005:

- 70 percent of SO₂ emissions
- 50 percent of mercury emissions
- 34 percent of GHG emissions
- 18 percent of NO_x emissions

By controlling these emissions using appropriate regulations under clear statutory authority EPA will go a long way towards meeting its mandate to protect public health and welfare. The electric power industry has had substantial time to prepare for regulations and once rules are final the industry will have a clear regulatory roadmap to guide investments. Misleading charts that exaggerate EPA actions such as those distributed by EEI cause confusion that will only increase uncertainty for the electric power industry and jeopardize important efforts to protect public health.

For more information, please contact John Larsen; jlarsen@wri.org.

ENDNOTES

1. See page 3 of the "An Exchange on Change" Edison Electric Institute, 2010. <http://www.eei.org/magazine/EEI%20Electric%20Perspectives%20Article%20Listing/2010-09-01-EXCHANGE.pdf>
2. The Edison Electric Institute has circulated a chart, a version of which can be found here, <http://www.eei.org/meetings/Meeting%20Documents/EPA-CAAUtilityRegTimelineTrain-WreckChart.ppt> that grossly misrepresents the EPA regulatory timeline for coal fired power plants. Through this article, WRI is countering this misleading chart.
3. If states believe that the only way to come into attainment of NAAQS standards is by obtaining additional reductions from electric generators, then the most likely way for states to affect those changes is through modification of the existing regulations that already control emissions of those same pollutants. EPA could undertake similar action through a future update to the transport rule.
4. Figures are in 2001 dollars and apply only to EPA air rules. See page 13 of the Office of Management and Budget's 2010 report. http://www.whitehouse.gov/sites/default/files/omb/legislative/reports/2010_Benefit_Cost_Report.pdf
5. Based on statutory requirements and court rulings.
6. Assuming no additional delays in rulemaking due to administrative actions, litigation and/or court actions.
7. <http://www.wri.org/stories/2010/11/what-are-limits-epa-clean-air-act-holds-answers>.
8. <http://www.nytimes.com/2008/12/25/us/25sludge.html?scp=11&sq=Roane%20County%20tennessee%20coal&st=cse>.

ABOUT WRI

The World Resources Institute is an environmental think tank that goes beyond research to find practical ways to protect the earth and improve people's lives. Our mission is to move human society to live in ways that protect Earth's environment and its capacity to provide for the needs and aspirations of current and future generations.

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
		<u>Distribution</u>							
1	10000107	Line Extensions - Residential	4/30/2011	282,067	278,722	#N/A	#N/A	#N/A	#N/A
2	10000207	Line Extension - Commercial	12/31/2010	834,090	841,316	#N/A	#N/A	#N/A	#N/A
3	10000507	Lighting	12/31/2010	102,254	30,418	#N/A	#N/A	#N/A	#N/A
4	10000607	Distr. Remove & Replace	12/31/2010	1,345,420	1,132,797	#N/A	#N/A	#N/A	#N/A
5	10000707	System Improvements	12/31/2010	786,679	284,938	#N/A	#N/A	#N/A	#N/A
6	10000807	Services	12/31/2010	1,850,936	1,824,008	#N/A	#N/A	#N/A	#N/A
7	10000907	Transformers	12/31/2010	4,972,748	4,993,836	#N/A	#N/A	#N/A	#N/A
8	10001007	Meter Equipment	12/31/2009	1,939,014	1,995,036	#N/A	#N/A	#N/A	#N/A
9	10001207	Pole Replacement	6/30/2010	472,942	493,928	#N/A	#N/A	#N/A	#N/A
10	10001307	Cable Replacement	12/31/2010	2,719,919	2,912,712	#N/A	#N/A	#N/A	#N/A
11	10030509	ABQ ESC Structural Maintenance	12/30/2009	327,595	-	#N/A	#N/A	#N/A	#N/A
12	14000107	Line Extensions - Residential	12/30/2010	36,094	26,109	#N/A	#N/A	#N/A	#N/A
13	14000207	Line Extensions - Commercial	11/11/2009	2,922	4,239	#N/A	#N/A	#N/A	#N/A
14	14000607	Distr. Remove & Replace	12/30/2010	20,952	12,697	#N/A	#N/A	#N/A	#N/A
15	14000707	Distr. System Improvements	5/5/2010	148,733	12,446	#N/A	#N/A	#N/A	#N/A
16	20000107	Line Extension - Residential	6/30/2010	22,238	19,553	#N/A	#N/A	#N/A	#N/A
17	20000207	Line Extensions - Commercial	6/30/2010	24,007	27,351	#N/A	#N/A	#N/A	#N/A
18	20000507	Lighting	12/31/2009	16,974	14,042	#N/A	#N/A	#N/A	#N/A
19	20000607	Distr. Remove & Replace	6/30/2010	114,342	109,061	#N/A	#N/A	#N/A	#N/A
20	20000707	Distr. System Improvements	6/30/2010	63,821	65,857	#N/A	#N/A	#N/A	#N/A
21	20000807	Services	12/31/2009	73,887	62,840	#N/A	#N/A	#N/A	#N/A
22	20001207	Pole Replacements	6/30/2010	39,350	55,084	#N/A	#N/A	#N/A	#N/A
23	30000107	LV-Line Extensions - Residenti	4/15/2010	7,076	3,334	#N/A	#N/A	#N/A	#N/A
24	30000207	Line Extension - Commercial	6/30/2010	45,841	26,374	#N/A	#N/A	#N/A	#N/A
25	30000507	Lighting	1/30/2010	2,322	1,984	#N/A	#N/A	#N/A	#N/A
26	30000607	Distr. Remove & Replace	3/30/2010	71,477	80,240	#N/A	#N/A	#N/A	#N/A
27	30000807	Services	12/31/2010	67,868	51,093	#N/A	#N/A	#N/A	#N/A
28	30001207	Pole Replacement	3/31/2010	20,032	23,093	#N/A	#N/A	#N/A	#N/A
29	41000107	Line Extensions - Residential	12/31/2010	352,275	317,773	#N/A	#N/A	#N/A	#N/A
30	41000207	Line Extensions - Commercial	12/31/2010	608,785	418,172	#N/A	#N/A	#N/A	#N/A
31	41000607	Distr. Remove & Replace	12/31/2010	476,184	331,718	#N/A	#N/A	#N/A	#N/A
32	41000706	ED System Improvements	1/31/2010	130,213	-	#N/A	#N/A	#N/A	#N/A
33	41000707	Distr. System Improvements	12/31/2010	1,075,913	682,984	#N/A	#N/A	#N/A	#N/A
34	41000807	Services	12/31/2010	1,241,703	1,118,667	#N/A	#N/A	#N/A	#N/A
35	41001207	Pole Replacement	12/30/2010	81,659	86,744	#N/A	#N/A	#N/A	#N/A
36	41001307	Cable Replacement	12/30/2020	1,758,701	1,334,232	#N/A	#N/A	#N/A	#N/A
37	41002306	Camel Tracks Upgrade Get-a-way	1/31/2010	337,597	-	#N/A	#N/A	#N/A	#N/A
38	41030609	SF ESC Structural Maintenance	1/15/2010	221,778	-	#N/A	#N/A	#N/A	#N/A
39	41034009	SF 2009 Tools & Equip.	2/1/2010	40,188	-	#N/A	#N/A	#N/A	#N/A
40	50000107	Line Extension - Residential	12/31/2010	197,545	209,038	#N/A	#N/A	#N/A	#N/A
41	50000207	Line Extension - Commercial	7/30/2010	51,912	70,518	#N/A	#N/A	#N/A	#N/A
42	50000507	Lighting	12/31/2010	23,844	9,127	#N/A	#N/A	#N/A	#N/A
43	50000607	Distr. Remove & Replace	12/30/2010	180,087	146,066	#N/A	#N/A	#N/A	#N/A
44	50000707	Distr. System Improvements	6/30/2010	70,735	37,896	#N/A	#N/A	#N/A	#N/A
45	50000807	Services	12/31/2009	338,005	331,564	#N/A	#N/A	#N/A	#N/A
46	50001307	Cable Replacement	4/30/2010	127,027	-	#N/A	#N/A	#N/A	#N/A
47	60002009	2009 Misc Substation Improveme	12/31/2009	523,348	-	#N/A	#N/A	#N/A	#N/A
48	60029905	Merit Plus	12/31/2010	29,099	16,293	#N/A	#N/A	#N/A	#N/A
49	60002406	ED SCADA Modernization	12/31/2009	439,156	-	#N/A	#N/A	#N/A	#N/A

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
50	60002408	Buckman Substation Upgrade & F	6/1/2010	4,069,603	-	1091	3/24/2009	n/a	n/a
51	60002508	Progress Substation & Feeders	12/30/2010	4,987,776	-	1089	11/10/2008	n/a	n/a
52	60002709	Sandia Substation	12/31/2010	-	4,111,043	1095	6/3/2009	n/a	n/a
53	60002809	Veranda Unit II Transformer 33	12/31/2010	3,597,328	-	1099	8/25/2009	n/a	n/a
54	60002921	LAGUNA SUBSTATION	12/15/2009	550,875	-	#N/A	#N/A	#N/A	#N/A
55	60003108	SW Mesa Substation Site Purcha	12/31/2009	516,772	-	#N/A	#N/A	#N/A	#N/A
56	60003210	Caja Del Rio Substation	6/30/2011	-	4,330,997	1103	1/11/2010	n/a	n/a
57	89900107	Line Extension - Residential	5/30/2010	448,327	453,010	#N/A	#N/A	#N/A	#N/A
58	89900207	Line Extensions - Commercial	12/3/2010	894,153	518,127	#N/A	#N/A	#N/A	#N/A
59	89900607	Distr. Remove & Replace	12/30/2010	261,630	84,684	#N/A	#N/A	#N/A	#N/A
60	89900707	Distr. system Improvements	5/30/2010	238,291	247,650	#N/A	#N/A	#N/A	#N/A
61	89900807	Services	3/28/2010	977,045	995,108	#N/A	#N/A	#N/A	#N/A
62	89901207	Pole Replacement	12/30/2010	79,347	-	#N/A	#N/A	#N/A	#N/A
63	89901609	Cable Testing Program Palm 11	8/1/2010	384,475	-	#N/A	#N/A	#N/A	#N/A
64	89902008	N. Bernalillo 11 - Algodones 1	12/30/2010	383,906	-	Not filed yet	-	n/a	n/a
65	90000207	Line Extensions - Commercial	12/31/2010	19,168	814	#N/A	#N/A	#N/A	#N/A
66	90000607	Distr. Remove & Replace	3/30/2010	9,314	-	#N/A	#N/A	#N/A	#N/A
67	90000807	Services	12/31/2009	5,269	(1,453)	#N/A	#N/A	#N/A	#N/A
					#N/A	#N/A	#N/A	#N/A	#N/A
68	10030610	2011 Communications Equipment Capital Budget	12/10/2010	9,365	25,853				
69	10034007	ABQ Metro 2010 Tools & Equipment	12/31/2010	206,169	408,596	#N/A	#N/A	#N/A	#N/A
		Black Ranch 12 Feeder Ties & Area Voltage			1106		4/1/2010	n/a	n/a
70	10002510	Support	9/30/2010	1,156,509	-				
		Eldorado Transformer Upgrade 115-12.47KV, 22.4			1105		3/20/2010	n/a	n/a
71	10001910	MVA	12/1/2010	1,892,109	-				
72	10001710	Volcano 12 to Volcano 23 Feeder Tie	7/30/2010	245,630	-	1104	3/12/2010	n/a	n/a
73	20034007	2010 Tools & Equipment-Deming	12/31/2010	12,996	26,178	#N/A	#N/A	#N/A	#N/A
74	20002109	Gold 13 Partial Relocation	12/31/2010	-	247,955	Not filed yet	n/a	n/a	n/a
75	30034007	2010 Tools & Equipment- Las Vegas	12/10/2010	5,462	11,899	#N/A	#N/A	#N/A	#N/A
76	30000707	NM T&D Blankets	12/10/2010	37,915	47,765	#N/A	#N/A	#N/A	#N/A
77	41034007	2010 Tools & Equipment-Santa Fe	12/10/2010	43,206	94,119	#N/A	#N/A	#N/A	#N/A
78	41001610	Mejia 12 Buckman Feeder Tie	6/1/2010	198,321	-	#N/A	#N/A	#N/A	#N/A
79	41000507	NM T&D Blankets	12/10/2010	11,651	14,713	#N/A	#N/A	#N/A	#N/A
80	60001910	60001910- Legal Account	12/31/2010	2,558	-	#N/A	#N/A	#N/A	#N/A
		Distribution Substation Equipment Replacements			#N/A	#N/A	#N/A	#N/A	#N/A
81	60005910	Blanket	12/10/2010	297,653	305,673				
82	60002110	Misc 46kv Line	12/1/2014	-	161,022	#N/A	#N/A	#N/A	#N/A
83	60002010	Misc Substation Improvements	12/31/2010	-	349,072	#N/A	#N/A	#N/A	#N/A
84	60003310	PI 46kv Cable Replacement	12/1/2010	211,196	-	#N/A	#N/A	#N/A	#N/A
85	60002710	Substation for ED Project	12/1/2011	-	6,281	#N/A	#N/A	#N/A	#N/A
86	60002308	ZB 46kV line Partial retirement	12/1/2011	2,380,997	547,520	1088	10/20/2008	n/a	n/a
87	89900507	NM T&D Blankets	12/31/2010	11,123	11,004	#N/A	#N/A	#N/A	#N/A
88	89901307	NM T&D Blankets	12/31/2010	220,179	-	#N/A	#N/A	#N/A	#N/A
89	90000707	NM T&D Blankets	12/10/2010	8,383	(3,189)	#N/A	#N/A	#N/A	#N/A
90	90034007	2010 Tools & Equipment - Clayton	12/10/2010	3,774	8,206	#N/A	#N/A	#N/A	#N/A
91		Total Distribution		49,095,823	33,496,548	#N/A	#N/A	#N/A	#N/A
					#N/A	#N/A	#N/A	#N/A	#N/A
92		High Lonesome Mesa			#N/A	#N/A	#N/A	#N/A	#N/A
93	64809008	High Lonesome Wind Ranch LLC F	12/31/2010	-	24,060,189	1081	8/19/2008	n/a	n/a
94		Total High Lonesome		-	24,060,189	#N/A	#N/A	#N/A	#N/A

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
95		Transmission				#N/A	#N/A	#N/A	#N/A
96	64807109	NB 345kV line Relay Upgrade	4/30/2010	239,083	-	#N/A	#N/A	#N/A	#N/A
97	64807209	Upgrade SJ-Shiprock 345 kV lin	12/31/2010	82,727	-	#N/A	#N/A	#N/A	#N/A
98	64807408	2008 Yah-Ta-Hey Shunt Capacito	12/31/2009	892,310	-	1078	7/3/2008	n/a	n/a
99	64907109	OJ Role Reinforcement and stru	12/31/2009	100,706	-	#N/A	#N/A	#N/A	#N/A
100	65006107	ANPP	12/15/2009	149,394	-	#N/A	#N/A	#N/A	#N/A
101	65006109	2009 ANPP Transmission	12/31/2009	445,256	-	#N/A	#N/A	#N/A	#N/A
102	65007007	Misc. Station Imp.	12/31/2010	28,692	-	#N/A	#N/A	#N/A	#N/A
103	65029905	Merit Plus	12/31/2010	37,193.93	16,007.46	#N/A	#N/A	#N/A	#N/A
104	65007009	2009 Misc. Transmission Statio	12/22/2010	105,859	-	#N/A	#N/A	#N/A	#N/A
105	65007107	Misc. Transmission	12/31/2010	283,673	-	#N/A	#N/A	#N/A	#N/A
106	65007109	2009 Misc. Transmission Improv	12/31/2010	379,199	-	#N/A	#N/A	#N/A	#N/A
107	65007308	Mimbres Shunt Capacitor Additi	12/31/2009	2,758,348	-	1083	9/3/2008	n/a	n/a
108	65007408	Rio Puerco 115kv Switching Sta	12/31/2010	1,370,240	-	1071	3/20/2008	n/a	n/a
109	65007508	Belen Series Reactor	12/1/2010	-	3,395,797	1100	9/8/2009	n/a	n/a
110	65007509	SPCC Improvements	12/1/2010	216,112	-	#N/A	#N/A	#N/A	#N/A
111	65007606	Switch Station Equip. Repl	12/20/2009	59,575	-	#N/A	#N/A	#N/A	#N/A
112	65007908	Relay Replacement	3/31/2010	35,226	-	#N/A	#N/A	#N/A	#N/A
113	65008409	Blackwater 230KV LTC Trans rep	8/15/2010	778,380	-	1096	6/24/2009	n/a	n/a
114	65008509	Veranda Unit II - 115KV Breake	11/1/2010	501,028	-	1099	8/25/2009	n/a	n/a
115	65008708	Progress Sub Transmission Line	12/31/2009	4,008,192	-	1089	11/10/2008	n/a	n/a
116	65009008	Rio Puerco 345kv Switching Sta	12/31/2011	24,018,399	-	1071	3/20/2008	n/a	n/a
117	65009108	Rio Puerco - Veranda 115kv Lin	12/31/2010	8,801,215	-	1071	3/20/2008	n/a	n/a
118	65009606	Blackwater Station Life Extens	12/31/2009	9,361,158	-	1052	11/22/2006	n/a	n/a
119	65034308	PNMR EMS & Disaster Recovery S	5/31/2010	6,084,210	-	1085	10/2/2008	n/a	n/a
120	65034010	2010 Co 2 Tools & Equipment	12/31/2010	185,210	182,490	#N/A	#N/A	#N/A	#N/A
121	65007710	2010 Switch Stations Replacement Capital Budget	12/10/2010	340,564	240,830	#N/A	#N/A	#N/A	#N/A
122	65030610	2011 Communications Equipment Capital Budget	12/10/2010	14,047	25,853	#N/A	#N/A	#N/A	#N/A
123	65008406	65008406 - Prosperity Site Acquisition	12/31/2010	5,575	-	#N/A	#N/A	#N/A	#N/A
124	65008010	A-class bucket truck	11/10/2010	601,759	-	#N/A	#N/A	#N/A	#N/A
125	65006110	ANPP Transmission	12/31/2010	-	351,912	#N/A	#N/A	#N/A	#N/A
126	65007310	Caja Del Rio Substation Tline	6/1/2011	-	276,339	1103	1/11/2010	n/a	n/a
127	65008910	Instrument Transformer Replacement	12/1/2010	289,588	-	#N/A	#N/A	#N/A	#N/A
128	65007010	Misc. Station Improvements	12/31/2010	-	343,287	#N/A	#N/A	#N/A	#N/A
129	65007110	Misc. Transmission	12/31/2014	-	440,534	#N/A	#N/A	#N/A	#N/A
130	65007410	Mobile 10 Mvar and 30 Mvar Capacitor and Mobile Breaker	9/1/2010	-	2,300,442	1108	5/12/2010	n/a	n/a
131	65008610	Modify NH Reactor Scheme	10/1/2010	37,271	-	#N/A	#N/A	#N/A	#N/A
132	65007510	Moriarty Switching Station and Shunt Capacitors	7/1/2012	-	810,000	#N/A	#N/A	#N/A	#N/A
133	65007209	Person/West Mesa Breaker Replacement	12/1/2010	-	-	Not yet filed	n/a	n/a	n/a
134	65007810	Relocation of Sandia Shunt Capacitors	10/1/2011	-	2,048,979	Not Filed Yet	n/a	n/a	n/a
135	65006010	San Juan Vail	12/31/2010	-	57,530	#N/A	#N/A	#N/A	#N/A
136	65006210	SW NM Transmission	12/31/2010	-	44,272	#N/A	#N/A	#N/A	#N/A
137	65008210	West Mesa 345kV Breaker replacement	10/1/2010	508,824	-	Not yet filed	n/a	n/a	n/a
138	65008710	Mendoza Substation	12/31/2011	-	3,433,941	1107	4/21/2010	n/a	n/a
139		Total Transmission		62,719,014	13,968,214	#N/A	#N/A	#N/A	#N/A

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
140		<u>Afton</u>				#N/A	#N/A	#N/A	#N/A
141	70816209	Purchase HMI Mark VI	3/31/2010	212,525	-	#N/A	#N/A	#N/A	#N/A
142	70716210	Afton Contractual Svc Agreement	11/30/13	-	10,737,158	#N/A	#N/A	#N/A	#N/A
143	70716310	Afton HRSG SH Expansion joint seals	3/30/10	260,952	-	#N/A	#N/A	#N/A	#N/A
		Afton minimum Load Limitation (OpFlex				#N/A	#N/A	#N/A	#N/A
144	70716610	Turndown)	3/31/10	-	800,325				
145	70716010	Afton Water Treatment	4/30/11	-	876,190	-	-	D - Other	Discharge Permit
146		Total Afton		473,477	12,413,673	#N/A	#N/A	#N/A	#N/A
147		<u>Lordsburg</u>				#N/A	#N/A	#N/A	#N/A
148	70316009	Lordsburg combustor upgrade	6/30/2010	894,753	-	#N/A	#N/A	#N/A	#N/A
149		<u>Reeves</u>				#N/A	#N/A	#N/A	#N/A
150	71318008	Reeves GS Reliability Project	7/31/2011	11,692,026	11,808,732	#N/A	#N/A	#N/A	#N/A
151		<u>Four Corners</u>				#N/A	#N/A	#N/A	#N/A
152	71519206	Four Corners - 2006	12/31/2010	72,595	-	#N/A	#N/A	#N/A	#N/A
153	71519207	Four Corners - 2007	4/18/2014	2,989,556	-	#N/A	#N/A	#N/A	#N/A
154	71519208	Four Corners Facility Improvem	4/15/2016	1,311,166	-	#N/A	#N/A	#N/A	#N/A
155	71519209	Four Corners Facility Improvem	12/31/2012	3,639,669	-	#N/A	#N/A	#N/A	#N/A
156	71519210	Four Corners Facility Improvement	12/31/2010	6,393,117	-	#N/A	#N/A	#N/A	#N/A
157	71519211	Four Corners Facility Improvement 2011	12/31/2011	-	2,692,920	#N/A	#N/A	#N/A	#N/A
158		Total Four Corners		14,406,102	2,692,920	#N/A	#N/A	#N/A	#N/A
159		<u>Palo Verde 1&2</u>				#N/A	#N/A	#N/A	#N/A
160	72123001	PALO VERDE CBI 2000	6/30/2010	102,834	-	#N/A	#N/A	#N/A	#N/A
161	72123005	PV - 721 2005	12/31/2010	2,364,151	-	#N/A	#N/A	#N/A	#N/A
162	72123007	PV - Unit 1	12/31/2010	1,971,519	-	#N/A	#N/A	#N/A	#N/A
163	72123009	PV Unit 1 CBIs	12/31/2014	190,973	-	#N/A	#N/A	#N/A	#N/A
164	72223005	PV - 722 2005	12/31/2010	501,024	3,009,006	#N/A	#N/A	#N/A	#N/A
165	72223006	PV - 722 2006	12/31/2009	24	-	#N/A	#N/A	#N/A	#N/A
166	72223007	PV - Unit 2	12/31/2010	-	226,790	#N/A	#N/A	#N/A	#N/A
167	72123410	PV capital structures all years all units	12/31/2014	3,020,778	3,556,944	#N/A	#N/A	#N/A	#N/A
168		Total Palo Verde 1&2		8,151,302	6,792,740	#N/A	#N/A	#N/A	#N/A
169		<u>Palo Verde 3</u>				#N/A	#N/A	#N/A	#N/A
170	72323005	PV - 723 2005	12/31/2010	3,223,661	-	#N/A	#N/A	#N/A	#N/A
171	72323006	PV - 723 2006	3/30/2013	115,903	-	#N/A	#N/A	#N/A	#N/A
172	72323007	PV - Unit 3	12/31/2010	1,748,120	-	#N/A	#N/A	#N/A	#N/A
173	72323008	PV Unit 3 CBIs	12/15/2010	120,913	-	#N/A	#N/A	#N/A	#N/A
174	72323009	PV Unit 3 CBIs	12/31/2015	196,889	-	#N/A	#N/A	#N/A	#N/A
175	72323410	PV capital structures all years all units	1/1/2015	3,660,586	403,308	#N/A	#N/A	#N/A	#N/A
176		Total Palo Verde 3		9,066,073	403,308	#N/A	#N/A	#N/A	#N/A
177		<u>Palo Verde Common</u>				#N/A	#N/A	#N/A	#N/A
178	72423001	PALO VERDE CBI 2000	6/30/2012	2,659,295	-	#N/A	#N/A	#N/A	#N/A
179	72423005	PV- 724 2005 Common	12/31/2010	1,627,752	-	#N/A	#N/A	#N/A	#N/A
180	72423006	PV - 724 2006 Common	6/30/2011	321,902	8,469,776	#N/A	#N/A	#N/A	#N/A
181	72423007	PV - Common	12/31/2010	-	413,897	#N/A	#N/A	#N/A	#N/A

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
182	72423008	PV Common	12/31/2012	-	1,845,164	#N/A	#N/A	#N/A	#N/A
183	72423009	PV Common CBIs	7/30/2012	-	1,394,376	#N/A	#N/A	#N/A	#N/A
184	72523007	PV - Water Projects	12/31/2010	1,443,198	2,704,057	#N/A	#N/A	#N/A	#N/A
185	72523008	PV Water Projects	12/31/2011	-	738,735	#N/A	#N/A	#N/A	#N/A
186	72523009	PV Water Projects CBIs	8/1/2013	-	508,104	#N/A	#N/A	#N/A	#N/A
187	72523410	Palo Verde Wtr Rec Facility	12/31/2014	-	5,476,208	#N/A	#N/A	#N/A	#N/A
188	72423410	PV - 724 2011 Common	12/31/2014	-	8,485,104	#N/A	#N/A	#N/A	#N/A
189		Total Palo Verde Common		6,052,147	30,035,421	#N/A	#N/A	#N/A	#N/A
190		<u>Luna</u>				#N/A	#N/A	#N/A	#N/A
191	74416109	Luna 2009 GE LTSA	3/31/2010	276,435	-	#N/A	#N/A	#N/A	#N/A
192	74416006	Legal costs	12/31/2010	896	-	#N/A	#N/A	#N/A	#N/A
193	74416811	Luna Capital Improvements	12/31/2014	-	582,114	#N/A	#N/A	#N/A	#N/A
194	74417010	Luna GE LTSA	4/30/2014	23,992	3,524,705	#N/A	#N/A	#N/A	#N/A
195	74416910	Luna gearbox	12/31/2010	378,124	-	#N/A	#N/A	#N/A	#N/A
196		Total Luna		679,448	4,106,820	#N/A	#N/A	#N/A	#N/A
197		<u>San Juan</u>				#N/A	#N/A	#N/A	#N/A
198	76116006	761 SJ 2006	3/31/2010	43,245	-	#N/A	#N/A	#N/A	#N/A
199	76116008	SJ Unit 1	6/30/2010	1,898,639	-	#N/A	#N/A	#N/A	#N/A
200	76116708	SJ Unit 1 Reclass O & M to Cap	8/31/2010	83,434	-	#N/A	#N/A	#N/A	#N/A
201	76216006	762 SJ 2006	6/30/2010	38,252	-	#N/A	#N/A	#N/A	#N/A
202	76216109	Unit 2 DCS Operator Workstatio	12/31/2009	(373)	-	#N/A	#N/A	#N/A	#N/A
						-	-	C - Air	This project is required for reliable operation under and ongoing compliance with the 2005 Consent Decree
203	76216209	Unit 2 CO Monitor Grid	6/30/2010	262,427	-				
204	76216308	Air Preheater Upgrade	12/31/2009	(889)	-	#N/A	#N/A	#N/A	#N/A
205	76216408	Exciter	4/30/2010	678,252	-	#N/A	#N/A	#N/A	#N/A
206	76216609	Dissimilar Tube Replacement	4/30/2010	35,999	-	#N/A	#N/A	#N/A	#N/A
207	76216708	SJ Unit 2 Reclass O & M to Cap	8/31/2010	160,376	-	#N/A	#N/A	#N/A	#N/A
208	76216709	SJ U2 Outage Contingency Funds	4/30/2010	2,642,123	-	#N/A	#N/A	#N/A	#N/A
209	76217109	SJ U2 Main & Aux Transf Bushin	6/30/2010	109,067	-	#N/A	#N/A	#N/A	#N/A
210	76217209	SJ U2 cooling tower replacemen	6/30/2010	407,291	-	#N/A	#N/A	#N/A	#N/A
						-	-	C - Air	This project is a components of the San Juan Environmental Improvement project required by the 2005 Consent Decree
211	76221006	Unit 2 - SJ Environ. System En	12/31/2009	33,672	-				
212	76316006	763 SJ 2006	6/30/2010	82,441	-	#N/A	#N/A	#N/A	#N/A
213	76316007	SJ - Unit 3 2007	6/30/2010	7,972	-	#N/A	#N/A	#N/A	#N/A
214	76316008	SJ Unit 3	3/31/2010	231,837	-	#N/A	#N/A	#N/A	#N/A
215	76316109	Unit 3 Startup Transformer Rep	6/30/2010	1,231,600	-	#N/A	#N/A	#N/A	#N/A
216	76316208	SJ Unit 3 HP/IP Rotor Replacem	5/30/2010	7,439,812	-	#N/A	#N/A	#N/A	#N/A
217	76316309	SJ U3 FD Fan motor rewind	3/31/2010	262,774	-	#N/A	#N/A	#N/A	#N/A
218	76316409	SJ U3 3B PA Fan Motor Rewind	3/31/2010	93,994	-	#N/A	#N/A	#N/A	#N/A

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						-	-	C - Air	This project is required for reliable operation under and ongoing compliance with the 2005 Consent Decree
219	76316410	SJ U3 bag house bag replacemen	7/30/2010	1,672,206	-	-	-	C - Air	This project is required for reliable operation under and ongoing compliance with the 2005 Consent Decree
220	76316511	SJ U3 air preheater bask repla	6/30/2010	1,431,911	-				
221	76316609	SJ U3 start up bus modificatio	3/31/2010	143,161	-	#N/A	#N/A	#N/A	#N/A
222	76316708	SJ Unit 3 2008 Planned Outage	3/31/2010	893,159	-	#N/A	#N/A	#N/A	#N/A
223	76316709	SJ U3 sootblower	4/20/2010	514,044	-	#N/A	#N/A	#N/A	#N/A
224	76316808	SJ Unit 3 Reclass O & M to Cap	3/31/2010	10,482	-	#N/A	#N/A	#N/A	#N/A
						-	-	C - Air	This project is a components of the San Juan Environmental Improvement project required by the 2005 Consent Decree
225	76321006	Unit 3 - SJ Environ. System En	6/30/2009	8,576	-				
226	76416007	SJ - Unit 4 2007	6/30/2010	10,107	-	#N/A	#N/A	#N/A	#N/A
227	76416108	Generator Rewind	6/30/2010	1,444,142	-	#N/A	#N/A	#N/A	#N/A
228	76416208	Unit 4 HP/IP Rotor Replacement	12/31/2010	6,525,375	-	#N/A	#N/A	#N/A	#N/A
229	76416408	U4 Waterwall Replacement Panel	4/30/2010	823,512	-	#N/A	#N/A	#N/A	#N/A
						-	-	C - Air	This project is required for reliable operation under and ongoing compliance with the 2005 Consent Decree
230	76416410	SJ u4 bag house bag replacemen	3/14/2010	1,446,762	-				
231	76416609	Rewind Unit 4A PA Fan Motor	3/31/2010	78,779	-	#N/A	#N/A	#N/A	#N/A
232	76416811	SJ U4 Aux A Transformer bushin	3/31/2010	69,171	-	#N/A	#N/A	#N/A	#N/A
233	76417109	SJ U4 cooling tower rebuild 09	3/31/2010	(18,983)	214,941	#N/A	#N/A	#N/A	#N/A
234	76417209	SJ u4 sootblower addition	4/20/2010	319,133	-	#N/A	#N/A	#N/A	#N/A
235	76417909	SJ U4 R Cell Demister Pad Repl	3/31/2010	113,706	-	#N/A	#N/A	#N/A	#N/A
						-	-	C - Air	This project is required for reliable operation under and ongoing compliance with the 2005 Consent Decree
236	76417910	SJ U4 air preheater basket rep	4/30/2010	865,975	-	-	-	C - Air	This project is a components of the San Juan Environmental Improvement project required by the 2005 Consent Decree
237	76421006	Unit 4 - SJ Environ. System En	2/28/2008	(9,411)	-				
238	76516005	SJ - 765 - 2005	12/31/2010	121	-	#N/A	#N/A	#N/A	#N/A
239	76516008	SJ Unit 1 & 2 Common	6/30/2010	125,469	-	#N/A	#N/A	#N/A	#N/A

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
						-	-	C - Air	This project is a components of the San Juan Environmental Improvement project required by the 2005 Consent Decree
240	76521006	SJ Environmental - U1 & U2 Com	12/30/2008	79	-				
241	76616005	SJ - 766 - 2005	4/30/2010	286,225	-	#N/A	#N/A	#N/A	#N/A
242	76616006	766 SJ 2006	6/30/2010	1,753,732	-	#N/A	#N/A	#N/A	#N/A
243	76616007	SJ - Common 2007	6/30/2010	235,875	-	#N/A	#N/A	#N/A	#N/A
244	76616110	SJ common new river to lake li	7/31/2011	17,342	4,858,291	#N/A	#N/A	#N/A	#N/A
245	76616208	FERC Cyber Security	6/30/2010	863,033	-	#N/A	#N/A	#N/A	#N/A
						-	-	C - Air	This project is required for reliable operation under and ongoing compliance with the 2005 Consent Decree
246	76616609	Spare Baghouse Bags	3/31/2010	1,297,248	-				
247	76617409	SJ Common Conveyor Belt 4A	6/30/2010	93,996	-	#N/A	#N/A	#N/A	#N/A
248	76617609	SJ Common 4B conveyor motor re	6/30/2010	93,170	-	#N/A	#N/A	#N/A	#N/A
249	76716006	767 SJ 2006	6/30/2010	711,542	-	#N/A	#N/A	#N/A	#N/A
250	76716007	SJ - Unit 3 & 4 Common	6/30/2010	299,758	-	#N/A	#N/A	#N/A	#N/A
251	76716008	SJ Units 3 & 4 Common	6/30/2010	99,309	-	#N/A	#N/A	#N/A	#N/A
252	76716109	U 3&4 Sootblowing Air Comp Con	5/31/2010	71,470	-	#N/A	#N/A	#N/A	#N/A
253	77916108	130V & 48V Battery Upgrades	1/31/2010	75,385	-	#N/A	#N/A	#N/A	#N/A
254	77916109	SJ switchyard 2009 CBI	6/30/2010	4,581	-	#N/A	#N/A	#N/A	#N/A
255	77916208	345kv Yard Breakers Replacemen	12/31/2009	379,913	-	#N/A	#N/A	#N/A	#N/A
256	77916308	345kv Yard Ground Grid Upgrade	6/30/2010	157,871	-	#N/A	#N/A	#N/A	#N/A
		SJ Plant Common Brine Concentrator Body				#N/A	#N/A	#N/A	#N/A
257	76616011	Replacement	10/31/2011	-	249,024				
258	76617310	SJ Plant Common Cathodic Protection Upgrade	8/30/2011	-	335,465	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
259	76616310	SJ Plant Common DCS Controls System Upgrade	9/30/2010	91,661	-				
		SJ Plant Common Lake Station Switchgear				#N/A	#N/A	#N/A	#N/A
260	76617109	Upgrade	10/31/2012	-	163,040				
261	76616410	SJ Plant Common New Lake Outlet Valves	9/30/2010	31,982	-	#N/A	#N/A	#N/A	#N/A
262	76616311	SJ Plant Common PI Installation	9/30/2011	-	176,024	#N/A	#N/A	#N/A	#N/A
263	76616610	SJ Plant Common Radio Repeater Installation	8/30/2011	-	159,951	#N/A	#N/A	#N/A	#N/A
		SJ Plant Common Reactive Compensation				#N/A	#N/A	#N/A	#N/A
264	76617210	System	12/31/2010	1,181,304	-				
265	76616211	SJ Plant Common River Station Switchgear	10/31/2011	-	74,166	#N/A	#N/A	#N/A	#N/A
						-	-	C - Air	SJGS Regional Haze BART determination
266	76617110	SJ Plant Common SCR Engineering Study	4/30/2011	-	507,585				
267	76616910	SJ Plant Common Spare Transformer Upgrade	10/30/2010	367,310	-	#N/A	#N/A	#N/A	#N/A
268	76617010	SJ Plant Common Tube Bender	2/28/2011	-	262,445	#N/A	#N/A	#N/A	#N/A
269	76516011	2011 U1&2 Spare Booster Blower Motor	11/30/2011	-	165,183	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
270	76516510	SJ U1&2 5B Tripper Conveyor Belt Replacement	11/30/2010	100,200	-				
271	76516410	SJ U1&2 Ash Unloading Curb	6/30/2010	85,038	-	#N/A	#N/A	#N/A	#N/A
272	76516311	SJ U1&2 Coal Pile Runoff Basin	8/30/2011	-	322,017	-	-	D - Other	Discharge Permit
		SJ U1&2 Flyash Bin Construction Elevator				#N/A	#N/A	#N/A	#N/A
273	76516110	Installation	12/31/2010	142,577	-				

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						-	-	C - Air	This project is required for reliable operation under and ongoing compliance with the 2005 Consent Decree
274	76516310	SJ U1&2 SO2 Transformer	3/30/2011	-	1,347,090				
275	76516210	SJ U1&2 Spare burner barrels	1/31/2010	43,135	-	#N/A	#N/A	#N/A	#N/A
276	76516010	SJ U1&2 Tripper Deck HVAC Upgrade	8/31/2011	-	322,677	#N/A	#N/A	#N/A	#N/A
277	76516211	SJ Unit 1&2 Spare Boiler Feed Pump	1/31/2011	-	401,415	#N/A	#N/A	#N/A	#N/A
278	76516111	U1&2 Spare Circulating Water Pump Motor	12/31/2011	-	225,225	#N/A	#N/A	#N/A	#N/A
279	76716311	SJ U3&4	1/31/2011	-	54,147	#N/A	#N/A	#N/A	#N/A
280	76716010	SJ U3&4 5C Tripper Belt Replacement	9/30/2010	88,477	-	#N/A	#N/A	#N/A	#N/A
281	76716110	SJ U3&4 Auxillary Cooling Tower Upgrades	4/30/2010	507,055	-	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
282	76716210	SJ U3&4 Auxilliary Cooling Tower Fire Protection	3/1/2010	74,357	-				
283	76716510	SJ U3&4 HVAC Upgrade	7/30/2010	198,608	-	#N/A	#N/A	#N/A	#N/A
284	76716410	SJ U3&4 Sootblowing Air Compressor Controls	5/30/2010	185,216	-	#N/A	#N/A	#N/A	#N/A
285	76716011	SJ U3&4 Spare Circulating Water Pump Motor	4/30/2011	-	375,579	#N/A	#N/A	#N/A	#N/A
286	76716411	SJ U3&4 Spare Pulverizer Motor	12/31/2011	-	106,953	#N/A	#N/A	#N/A	#N/A
287	76716211	SJ Unit 3&4 Spare Pulverizer Gearbox	1/31/2011	-	299,325	#N/A	#N/A	#N/A	#N/A
		2009 SJU1 Coal Balancing and Pulverizer Upgrades	2/25/2010	299,550	-	#N/A	#N/A	#N/A	#N/A
288	76116220					#N/A	#N/A	#N/A	#N/A
289	76116911	SJ U1 Additional Sootblowers starts in Aug 2010	3/13/2011	-	570,312	-	-	C - Air	This project is required for reliable operation under and ongoing compliance with the 2005 Consent Decree
290	76117011	SJ U1 Bag House Bag Replacement	4/30/2011	-	1,448,930				
		SJ U1 Boiler Feed Pump Supervisory Instrumentation	3/20/2011	-	109,708	#N/A	#N/A	#N/A	#N/A
291	76117810								
292	76117710	SJ U1 Bottom Ash Control System Upgrade	12/31/2011	-	105,971	#N/A	#N/A	#N/A	#N/A
293	76117610	SJ U1 Bottom Ash Detection and Control	1/31/2011	-	65,588	#N/A	#N/A	#N/A	#N/A
294	76116811	SJ U1 Circulating Water Line Coating	3/31/2013	-	376,231	#N/A	#N/A	#N/A	#N/A
295	76116711	SJ U1 Cooling Tower Fire Protection	6/30/2011	-	116,700	#N/A	#N/A	#N/A	#N/A
296	76117310	SJ U1 Cooling Tower Upgrades	4/30/2011	-	868,811	#N/A	#N/A	#N/A	#N/A
297	76117210	SJ U1 DCS Operator Workstation Upgrade	3/30/2011	-	217,468	#N/A	#N/A	#N/A	#N/A
298	76116510	SJ U1 Delta P Monitoring Equipment	5/31/2010	47,272	-	#N/A	#N/A	#N/A	#N/A
299	76117110	SJ U1 Digital Generator Protection Relay	3/30/2011	-	79,625	#N/A	#N/A	#N/A	#N/A
300	76116611	SJ U1 EHC Pump Modification	3/13/2011	-	283,972	#N/A	#N/A	#N/A	#N/A
301	76116910	SJ U1 Expansion Joint Replacement	3/14/2011	-	905,486	#N/A	#N/A	#N/A	#N/A
302	76116511	SJ U1 Generator Bushing Replacement (1 to 6)	3/13/2011	-	313,904	#N/A	#N/A	#N/A	#N/A
		SJ U1 Generator Links Expansion Joints Replacement	3/13/2011	-	53,589	#N/A	#N/A	#N/A	#N/A
303	76116411								
304	76116311	SJ U1 Generator TIL 1292	3/13/2011	-	771,601	#N/A	#N/A	#N/A	#N/A
305	76116810	SJ U1 Motor Rewinds	12/31/2014	-	153,901	#N/A	#N/A	#N/A	#N/A
306	76116211	SJ U1 Outage Emergent Projects	3/13/2011	-	896,539	#N/A	#N/A	#N/A	#N/A
307	76116710	SJ U1 PA/FD Fan Supervisory Instrumentation	3/20/2011	-	181,280	#N/A	#N/A	#N/A	#N/A
308	76116610	SJ U1 Retube 1B BCW Heat Exchanger	3/13/2011	-	151,431	#N/A	#N/A	#N/A	#N/A
309	76117012	SJ U1 Synch Relay	3/30/2012	-	-	#N/A	#N/A	#N/A	#N/A
310	76116310	SJ U1 Waterwall Replacement Panels	3/13/2011	-	2,334,138	#N/A	#N/A	#N/A	#N/A

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
311	76116410	SJ Unit 1 Turbine Underlagging Fire Protection	8/31/2010	190,776	-	#N/A	#N/A	#N/A	#N/A
312	76116110	Unit 1 Coal Piping Repairs	3/13/2011	-	158,930	#N/A	#N/A	#N/A	#N/A
313	76216010	2009 SJU2 Coal Balancing and Pulverizer Upgrades	5/31/2011	-	472,161	#N/A	#N/A	#N/A	#N/A
314	76216111	SJ U2 Acoustic Leak Detection System Installation	3/11/2012	-	-	#N/A	#N/A	#N/A	#N/A
315	76216211	SJ U2 Additional Sootblowers	3/11/2012	-	-	#N/A	#N/A	#N/A	#N/A
316	76216311	SJ U2 Ash Conveying System Upgrade	3/11/2012	-	-	#N/A	#N/A	#N/A	#N/A
					-	-	-	C - Air	This project is required for reliable operation under and ongoing compliance with the 2005 Consent Decree
317	76216411	SJ U2 Bag House Bag Replacement	4/30/2012	-	-				
318	76216711	SJ U2 Bottom Ash Control System Upgrade	6/30/2011	-	106,514	#N/A	#N/A	#N/A	#N/A
319	76216811	SJ U2 Bullnose Structural Repairs	3/11/2012	-	-	#N/A	#N/A	#N/A	#N/A
320	76216210	SJ U2 Cooling Tower Fire Protection	6/30/2010	117,279	-	#N/A	#N/A	#N/A	#N/A
321	76216310	SJ U2 Cooling Tower Upgrades	4/30/2012	249,967	611,586	#N/A	#N/A	#N/A	#N/A
322	76216911	SJ U2 DCS Operator Workstation Upgrade	3/30/2012	-	-	#N/A	#N/A	#N/A	#N/A
323	76216410	SJ U2 Delta P Monitoring Equipment	5/30/2010	47,272	-	#N/A	#N/A	#N/A	#N/A
324	76217111	SJ U2 Division Wall Replacement	3/11/2012	-	-	#N/A	#N/A	#N/A	#N/A
325	76216108	SJ U2 lower reheater	3/31/2010	14,607	-	#N/A	#N/A	#N/A	#N/A
326	76217411	SJ U2 Pulverizer Casing Replacements	3/16/2012	-	-	#N/A	#N/A	#N/A	#N/A
327	76216508	SJ U2 rear water wall slope tube	3/31/2010	1,878	-	#N/A	#N/A	#N/A	#N/A
328	76217611	SJ U2 Seal Trough Replacement	3/11/2012	-	-	#N/A	#N/A	#N/A	#N/A
329	76217711	SJ U2 Superheater Replacement	3/11/2012	-	-	#N/A	#N/A	#N/A	#N/A
330	76216208	SJ U2 upper lower economizer	3/31/2010	8,378	-	#N/A	#N/A	#N/A	#N/A
331	76216611	SJ Unit 2 Primary Superheater Replacement.	3/11/2012	-	-	#N/A	#N/A	#N/A	#N/A
		2010 SJ U3 PA/FD Fan Supervisory Instrumentation	5/9/2010	181,268	-	#N/A	#N/A	#N/A	#N/A
332	76317511								
333	76317411	SJ U3 2010 Unit 3 CO Monitor Grid	5/9/2010	422,130	-	#N/A	#N/A	#N/A	#N/A
334	76316110	SJ U3 Additional Sootblowers now 76316709	5/6/2010	505,394	-	#N/A	#N/A	#N/A	#N/A
335	76316310	SJ U3 Ash System Conveying Upgrade	5/9/2010	573,085	-	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
336	76316510	SJ U3 Baghouse Construction Elevator Installation	7/31/2011	-	104,861				
		SJ U3 Boiler Feed Pump Supervisory Instrumentation	5/6/2010	98,176	-	#N/A	#N/A	#N/A	#N/A
337	76316610								
338	76316710	SJ U3 Bottom Ash Area Drain Replacement	6/30/2010	174,959	-	#N/A	#N/A	#N/A	#N/A
339	76316810	SJ U3 Bottom Ash Detection and Control	5/9/2010	48,807	-	#N/A	#N/A	#N/A	#N/A
340	76317110	SJ U3 Cooling Tower	5/30/2011	2,280,907	1,574,072	#N/A	#N/A	#N/A	#N/A
341	76317010	SJ U3 Cooling Tower Fan Breakers	11/30/2010	503,268	-	#N/A	#N/A	#N/A	#N/A
342	76317210	SJ U3 Delta P Monitoring Equipment	5/28/2010	47,272	-	#N/A	#N/A	#N/A	#N/A
343	76316312	SJ U3 Expansion Joint Replacement	5/6/2012	1,200,233	-	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
344	76317310	SJ U3 Generator Monitoring Equipment Upgrade	5/9/2010	285,558	-				
345	76317410	SJ U3 Generator Rewind	5/6/2010	3,401,000	-	#N/A	#N/A	#N/A	#N/A
346	76317510	SJ U3 Generator TIL 1292	5/9/2010	764,337	-	#N/A	#N/A	#N/A	#N/A
347	76317610	SJ U3 Motor Rewinds	8/30/2014	175,389	-	#N/A	#N/A	#N/A	#N/A
348	76316512	SJ U3 Outage Emergent Projects	5/6/2010	874,182	-	#N/A	#N/A	#N/A	#N/A
349	76317710	SJ U3 Rectifier Cooler Upgrade	5/9/2010	108,972	-	#N/A	#N/A	#N/A	#N/A
350	76317810	SJ U3 Reheater Floor Replacement	5/9/2010	227,269	-	#N/A	#N/A	#N/A	#N/A

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
351	76316311	SJ U3 Remote Racking Absorber Area 2010 project	5/1/2010	95,527	-	#N/A	#N/A	#N/A	#N/A
352	76316411	SJ U3 Roof Refurbish	9/30/2011	-	124,029	#N/A	#N/A	#N/A	#N/A
353	76316611	SJ U3 Stator Cooling Upgrade 2010 project	4/30/2010	220,798	-	#N/A	#N/A	#N/A	#N/A
		SJ U3 Turbine Supervisory Instrumentation 2010 project	5/9/2010	224,769	-	#N/A	#N/A	#N/A	#N/A
354	76316711								
355	76316811	SJ U3 Turbine Underlagging Fire Protection	8/30/2011	-	189,989	#N/A	#N/A	#N/A	#N/A
356	76317211	SJ Unit 3 Coal Piping Repairs 2010 project	5/9/2010	182,913	-	#N/A	#N/A	#N/A	#N/A
		SJ Unit 3 Pulverizer Rotating Air Throats 2010 project	5/6/2012	173,326	173,854	#N/A	#N/A	#N/A	#N/A
357	76317311								
358	76317910	SJ Unit 3 Reheat Tube Replacement	5/9/2010	140,330	-	#N/A	#N/A	#N/A	#N/A
359	76317111	Unit 3 Chemical Feed Pump Upgrade	2/15/2011	-	53,092	#N/A	#N/A	#N/A	#N/A
		SJ U4 Main & Aux Transformer Relay Protection Upgrade	10/31/2010	27,612	-	#N/A	#N/A	#N/A	#N/A
360	76416510								
361	76416610	SJ U4 Absorber Mist Eliminators	3/31/2010	96,221	-	#N/A	#N/A	#N/A	#N/A
362	76416810	SJ U4 Ash Conveying System	5/14/2010	327,052	-	#N/A	#N/A	#N/A	#N/A
363	76416011	SJ U4 Bottom Ash Area Drain Replacement	7/30/2011	-	133,553	#N/A	#N/A	#N/A	#N/A
364	76416020	SJ U4 Bottom Ash Detection and Control 2010	3/14/2010	37,109	-	#N/A	#N/A	#N/A	#N/A
365	76416111	SJ U4 Cooling Tower Fire Protection	6/30/2011	-	57,237	#N/A	#N/A	#N/A	#N/A
366	76417010	SJ U4 Cooling Tower Upgrades	8/30/2012	308,096	1,486,916	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
367	76416711	SJ U4 DCS Operator Workstation Upgrade 2010	12/31/2012	144,669	-	#N/A	#N/A	#N/A	#N/A
368	76416310	SJ U4 Delta P Monitoring Equipment	5/30/2010	36,359	-	#N/A	#N/A	#N/A	#N/A
369	76417110	SJ U4 Expansion Joint Replacement	3/14/2010	652,904	-	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
370	76417210	SJ U4 Generator Monitoring Equipment Upgrade	3/14/2010	220,058	-	#N/A	#N/A	#N/A	#N/A
371	76416109	SJ U4 Generator Rewind	3/13/2010	1,497,138	-	#N/A	#N/A	#N/A	#N/A
372	76417310	SJ U4 Generator TIL 1292	3/14/2010	591,639	-	#N/A	#N/A	#N/A	#N/A
373	76417410	SJ U4 Motor Rewinds	6/30/2013	115,905	-	#N/A	#N/A	#N/A	#N/A
374	76417510	SJ U4 Outage Emergent Work- 2010	3/14/2010	713,284	-	#N/A	#N/A	#N/A	#N/A
375	76416110	SJ U4 Penthouse Pressurization Control	3/14/2010	34,906	-	#N/A	#N/A	#N/A	#N/A
376	76417610	SJ U4 Rectifier Cooler Upgrade	3/14/2010	83,831	-	#N/A	#N/A	#N/A	#N/A
377	76417710	SJ U4 Reheater Replacement	3/14/2010	168,395	-	#N/A	#N/A	#N/A	#N/A
378	76417810	SJ U4 Remote Racking Absorber Area	3/14/2010	73,592	-	#N/A	#N/A	#N/A	#N/A
		SJ U4 Subsynchronous Resonance Relay (SSO)				#N/A	#N/A	#N/A	#N/A
379	76416311	2010	3/10/2010	50,089	-	#N/A	#N/A	#N/A	#N/A
		SJ Unit 4 Pulverizer rotating air throat installation.				#N/A	#N/A	#N/A	#N/A
380	76416611	2010	3/11/2012	133,550	133,831	#N/A	#N/A	#N/A	#N/A
381	76416210	SJ UNIT 4 TORSIONAL STRESS RELAY	3/14/2010	85,257	-	#N/A	#N/A	#N/A	#N/A
382	76416511	Unit 4 CO Monitor Grid 2010	3/14/2010	325,483	-	#N/A	#N/A	#N/A	#N/A
383	76416411	Unit 4 Coal Piping Repairs 2010	3/14/2010	98,228	-	#N/A	#N/A	#N/A	#N/A
384	77916110	SJ Four Corners Relay Upgrade	3/2/2010	166,739	-	#N/A	#N/A	#N/A	#N/A
385	77916210	SJ Switchyard Battery Replacements	4/29/2010	118,775	-	#N/A	#N/A	#N/A	#N/A
		SJ Switchyard Directional Multiplexer Metering				#N/A	#N/A	#N/A	#N/A
386	77916410	System Replacement	9/10/2010	129,624	-	#N/A	#N/A	#N/A	#N/A
387	77916010	SJ Switchyard Grounding Upgrade	6/29/2011	-	1,109,411	#N/A	#N/A	#N/A	#N/A
388		Total San Juan		61,870,156	27,115,764	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
389		<u>PNM South Distribution</u>				#N/A	#N/A	#N/A	#N/A
390	15002108	SNM Load Research Project	12/31/2009	53,683	-	#N/A	#N/A	#N/A	#N/A

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
391	15002109	SNM 2009 Misc 69kv Line Improv	10/31/2009	104	-	#N/A	#N/A	#N/A	#N/A
392	15003009	2009 Substation Equip Repl.	6/30/2010	1,555	-	#N/A	#N/A	#N/A	#N/A
393	15030509	2009 Communications (CO 34)	1/2/2010	2,730	-	#N/A	#N/A	#N/A	#N/A
394	15100107	Line Extension - Residential	4/30/2010	22,281	70,986	#N/A	#N/A	#N/A	#N/A
395	15100207	Line Extension - Commercial	12/31/2010	31,172	52,453	#N/A	#N/A	#N/A	#N/A
396	15100507	Lighting	12/31/2009	84,191	77,089	#N/A	#N/A	#N/A	#N/A
397	15100607	ED Remove & Replace	3/31/2012	18,824	20,310	#N/A	#N/A	#N/A	#N/A
398	15100707	ED System Improvements	4/30/2010	74,782	42,182	#N/A	#N/A	#N/A	#N/A
399	15100807	Services	12/31/2009	128,743	61,894	#N/A	#N/A	#N/A	#N/A
400	15100907	Transformers	12/31/2009	282,016	177,043	#N/A	#N/A	#N/A	#N/A
401	15101007	Meter Equipment	12/31/2009	72,499	78,978	#N/A	#N/A	#N/A	#N/A
402	15101207	Pole Replacement	11/30/2009	53,024	57,398	#N/A	#N/A	#N/A	#N/A
403	15101307	Cable Replacement	12/31/2009	68,860	32,094	#N/A	#N/A	#N/A	#N/A
404	15102107	Alamo #1 115kv Termination Wor	12/31/2010	148,662	-	2005-1 TNMP	8/5/2005	n/a	n/a
405	15134009	Alamogordo 2009 Tools & Equipm	12/31/2009	12,638	-	#N/A	#N/A	#N/A	#N/A
406	15200107	Line Extension - Residential	2/22/2010	39,635	45,348	#N/A	#N/A	#N/A	#N/A
407	15200207	Line Extension - Commercial	12/31/2009	33,715	33,447	#N/A	#N/A	#N/A	#N/A
408	15200507	Lighting	1/29/2010	24,594	22,934	#N/A	#N/A	#N/A	#N/A
409	15200607	ED Remove & Replace	5/31/2010	83,303	9,006	#N/A	#N/A	#N/A	#N/A
410	15200707	ED System Improvements	5/31/2010	69,330	18,981	#N/A	#N/A	#N/A	#N/A
411	15200807	Services	12/31/2009	38,659	27,994	#N/A	#N/A	#N/A	#N/A
412	15200907	Transformers	12/31/2009	122,005	79,802	#N/A	#N/A	#N/A	#N/A
413	15201007	Meter Equipment	12/31/2009	38,142	35,720	#N/A	#N/A	#N/A	#N/A
414	15201207	Pole Replacement	5/31/2010	67,705	57,398	#N/A	#N/A	#N/A	#N/A
415	15201307	Cable Replacement	12/31/2009	168	20,529	#N/A	#N/A	#N/A	#N/A
416	15234009	Ruidoso 2009 Tools & Equipment	12/31/2009	14,595	-	#N/A	#N/A	#N/A	#N/A
417	15500107	Line Extension - Residential	7/30/2010	96,088	86,364	#N/A	#N/A	#N/A	#N/A
418	15500207	Line Extension - Commercial	6/30/2010	24,916	86,439	#N/A	#N/A	#N/A	#N/A
419	15500507	Lighting	12/31/2009	128,791	100,029	#N/A	#N/A	#N/A	#N/A
420	15500607	ED Remove & Replace	6/30/2010	57,615	41,863	#N/A	#N/A	#N/A	#N/A
421	15500707	ED System Improvements	4/30/2010	215,714	122,669	#N/A	#N/A	#N/A	#N/A
422	15500807	Services	12/31/2009	472,981	348,517	#N/A	#N/A	#N/A	#N/A
423	15500907	Transformers	12/31/2009	414,681	256,844	#N/A	#N/A	#N/A	#N/A
424	15501007	Meter Equipment	12/31/2009	257,529	114,707	#N/A	#N/A	#N/A	#N/A
425	15501207	Pole Replacement	12/31/2009	139,131	131,025	#N/A	#N/A	#N/A	#N/A
426	15534007	Tools & Equipment	1/5/2010	65,047	130,879	#N/A	#N/A	#N/A	#N/A
427	15534009	Silver City 2009 Tools & Equip	12/31/2009	49,652	-	#N/A	#N/A	#N/A	#N/A
428	15030510	Communications (CO 34) 2010	12/31/2010	55,631	21,718	#N/A	#N/A	#N/A	#N/A
429	15001610	MD#1 Spare Transformer	7/30/2010	94,287	-	#N/A	#N/A	#N/A	#N/A
430	15002110	SNM 2010 Misc 69kv Line Improve	12/31/2010	45,126	45,759	#N/A	#N/A	#N/A	#N/A
431	15034007	SNM Engineering 2010 Tools & Equipment	12/31/2010	8,717	17,560	#N/A	#N/A	#N/A	#N/A
432	15003010	SNM Substation Equip Repl.2010	12/31/2010	54,299	55,448	#N/A	#N/A	#N/A	#N/A
433	15134007	Alamogordo 2010 Tools & Equipment	12/31/2010	26,030	52,434	#N/A	#N/A	#N/A	#N/A
434	15234007	2010 Tools & Equipment - Ruidoso	12/31/2010	21,614	43,777	#N/A	#N/A	#N/A	#N/A
435	15501307	NM T&D Blankets	12/31/2010	-	53,076	#N/A	#N/A	#N/A	#N/A
436		Total PNM South Distribution		3,815,465	2,730,694	#N/A	#N/A	#N/A	#N/A
437		<u>PNM South Transmission</u>				#N/A	#N/A	#N/A	#N/A
438	22007008	Amrad 345/115 kv Transformer R	3/31/2010	1,889,048	-	1090	12/9/2008	n/a	n/a
439	22007109	2009 Misc. 115kv Trans Imp.	12/31/2009	166,153	-	#N/A	#N/A	#N/A	#N/A

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Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
440	22007209	Alamogordo Breaker Replacement	1/30/2010	67,272	-	#N/A	#N/A	#N/A	#N/A
441	22007307	Alamo Tap - Alamo #1 115kv Lin	12/30/2010	5,481,192	-	2005-1 TNMP	8/5/2005	n/a	n/a
442	22007309	Alamogordo 115kv Shunt Capacit	2/17/2010	819,032	-	1112	8/6/2010	n/a	n/a
443	22007210	Alamogordo Dona Ana Relay Upgrade	10/1/2010	-	143,422	#N/A	#N/A	#N/A	#N/A
444	22007308	HVDC Converter Station-Eddy Cou	12/31/2010	-	154,707	#N/A	#N/A	#N/A	#N/A
445	22007410	PD Load Shedding	11/29/2010	76,568	-	#N/A	#N/A	#N/A	#N/A
446	22007010	SNM Misc. Transmission Station 2010	12/31/2010	41,266	42,022	#N/A	#N/A	#N/A	#N/A
447	22007110	SNM Misc.115kv Trans Improvement	12/31/2010	100,407	102,346	#N/A	#N/A	#N/A	#N/A
448	22029905	22029905 Results pay	12/31/2011	28,232	49,172	#N/A	#N/A	#N/A	#N/A
449		Total PNM South Transmission		8,669,170	491,669	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
450		<u>Production Related</u>				#N/A	#N/A	#N/A	#N/A
451	70029905	Merit Plus	12/31/2011	75,476	158,157	#N/A	#N/A	#N/A	#N/A
452	70016108	Generation Legal Account	3/31/2011	-	16,353	#N/A	#N/A	#N/A	#N/A
453	70528009	Carbon strategy software	3/15/2010	364,187	-	#N/A	#N/A	#N/A	#N/A
454		Total Production Related		439,664	174,509	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
455		<u>Corporate Allocated - PNM Share</u>				#N/A	#N/A	#N/A	#N/A
		PeopleSoft Financials and Supply Chain Upgrade				#N/A	#N/A	#N/A	#N/A
456	91128108	to EPM 9.0	10/1/2010	1,072,735	-	#N/A	#N/A	#N/A	#N/A
457	91128211	Indus Asset Suite 6 0 Upgrade	1/30/2012	-	-	#N/A	#N/A	#N/A	#N/A
458	91128311	Hyperion Budget Tool Upgrade	11/1/2011	-	749,130	#N/A	#N/A	#N/A	#N/A
459	91128308	CFO Budget Tool	8/10/2010	1,980,576	-	#N/A	#N/A	#N/A	#N/A
460	92428209	My.PNM Content Mgmt System	2/26/2010	305,130	-	#N/A	#N/A	#N/A	#N/A
		PNM Marketing & Customer Service Business				#N/A	#N/A	#N/A	#N/A
461	92428310	Intelligence Roadmap 2010	2/28/2011	-	633,732	#N/A	#N/A	#N/A	#N/A
462	92428610	NM Banner Technology Upgrade	5/30/2010	862,451	-	#N/A	#N/A	#N/A	#N/A
463	94229610	ArcFM for PNM NM - Enterprise GIS	5/30/2011	-	4,446,911	#N/A	#N/A	#N/A	#N/A
464	94230011	GIS Vegetation Management Phase 2	10/30/2011	-	228,721	#N/A	#N/A	#N/A	#N/A
465	94230510	Security Equipment Upgrades	12/1/2010	44,292	44,342	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
466	94230710	Santa Fe Service Center Warehouse Dock Railing	12/31/2014	-	10,720	#N/A	#N/A	#N/A	#N/A
		Albuq Electric Service Center Building				#N/A	#N/A	#N/A	#N/A
467	94232410	Improvements	12/31/2014	57,577	-	#N/A	#N/A	#N/A	#N/A
468	94728008	NERC CIP 002-009, NM	9/30/2010	657,744	-	#N/A	#N/A	#N/A	#N/A
469	94829910	Utility Business Intelligence Roadmap 2010	2/28/2011	-	660,676	#N/A	#N/A	#N/A	#N/A
						#N/A	#N/A	#N/A	#N/A
470	96328011	Computer Platform Refresh-Telecom Blanket 2011	11/1/2011	-	406,785	#N/A	#N/A	#N/A	#N/A
471	96328111	Enterprise Telecom ISP DMZ	11/1/2011	-	391,984	#N/A	#N/A	#N/A	#N/A
472	96328210	Telecom Enterprise NOC	8/1/2010	381,105	-	#N/A	#N/A	#N/A	#N/A
473	96329310	Computer Platform Refresh -Telecom-2010	11/1/2010	406,464	-	#N/A	#N/A	#N/A	#N/A
474	96428011	Computer Platform Refresh PC's Blanket-2011	11/1/2011	-	467,071	#N/A	#N/A	#N/A	#N/A
475	96429410	Computer Platform Refresh PCs Blanket 2010	11/1/2010	463,875	-	#N/A	#N/A	#N/A	#N/A
476	96828011	ABQ Data Center Tape Library Refresh	11/1/2011	-	907,841	#N/A	#N/A	#N/A	#N/A
477	96828109	Email Archival System	9/1/2010	355,650	-	#N/A	#N/A	#N/A	#N/A
		Computer Platform Refresh (CPR)-Wintel Servers				#N/A	#N/A	#N/A	#N/A
478	96828211	Blanket 2011	11/1/2011	-	383,983	#N/A	#N/A	#N/A	#N/A
		Computer Platform Refresh-Unix Servers Blanket				#N/A	#N/A	#N/A	#N/A
479	96828411	2011	11/1/2011	-	155,069	#N/A	#N/A	#N/A	#N/A
480	96828509	VMware Implementation	7/1/2010	1,709,026	-	#N/A	#N/A	#N/A	#N/A

PNM Exhibit Staff 2-18

Requested Capital Additions through the end of the Test Period

Line No.	Project No.	Project Description	Estimated Completion Date	2010 Clearings	2011 Clearings	440 Filing no.	440 Date	Staff 2-18 Category	Statute, Regulation, Rule or Admin. Proceeding
481	96828510	Disaster Recovery Equipment, Software, and Hardware Blanket (2010)	12/15/2010	600,010	-	#N/A	#N/A	#N/A	#N/A
482	96828511	Disaster Recovery Equipment, Software, and Hardware Blanket-2011	12/15/2011	-	596,896	#N/A	#N/A	#N/A	#N/A
483	96828610	Data Integration Platform - TIBCO iProcess Implementation	11/1/2010	399,373	-	#N/A	#N/A	#N/A	#N/A
484	96829110	DM Library Consolidation	12/1/2011	-	1,008,212	#N/A	#N/A	#N/A	#N/A
485	96829210	Computer Platform Refresh-UNIX Servers Blanket-2010	11/1/2010	151,330	-	#N/A	#N/A	#N/A	#N/A
486	96829310	Data Backup and Recovery Deduplication	8/1/2010	437,081	-	#N/A	#N/A	#N/A	#N/A
487	96829510	Computer Platform Refresh (CPR) Wintel Servers/Storage Blanket 2010	11/1/2010	383,636	-	#N/A	#N/A	#N/A	#N/A
488	96829710	Remote Computing Security Enhancement	5/1/2011	-	410,801	#N/A	#N/A	#N/A	#N/A
489	97731610	Life Safety Code Upgrades	12/31/2014	27,666	27,701	#N/A	#N/A	#N/A	#N/A
490	97731910	Downtown Emergency Generator Replacement	12/31/2011	-	200,300	#N/A	#N/A	#N/A	#N/A
491	99231310	RIMS Fireproof File Cabinets	12/31/2011	-	15,185	#N/A	#N/A	#N/A	#N/A
492	99529909	Co 7 - Incentive Compensation Plan - Merit Plus Bar Code Readers for Downtown, San Juan, and Texas Facilities	12/31/2010	125,312	4,189	#N/A	#N/A	#N/A	#N/A
493	99232110	Total Allocated Related	12/10/2010	5,695	-				
494				<u>10,426,727</u>	<u>11,750,250</u>				
495		Total Capital Additions		<u>248,451,345</u>	<u>182,041,450</u>				

PNM Year-to-Date (1/1 to 10/31/2010) CO2 Emissions							
State	Facility Name	Year	Operating Time	# of Months Reported	CO2 Tons ^{1, 2}	PNM Percent Ownership	PNM 2010 YTD CO2 tons
NM	Afton Generating Station	2010	1,773	9	128,147	100.0%	128,147
NM	Four Corners Steam Elec Station	2010	4,029	9	2,408,811	13.0%	313,145
NM	Four Corners Steam Elec Station	2010	5,985	9	4,282,088	13.0%	556,671
NM	Lordsburg Generating Station	2010	698	9	10,385	100.0%	10,385
NM	Lordsburg Generating Station	2010	709	9	10,734	100.0%	10,734
NM	Luna Energy Facility	2010	4,624	9	328,491	100.0%	328,491
NM	Luna Energy Facility	2010	4,604	9	336,424	100.0%	336,424
NM	Reeves Generating Station	2010	915	9	13,148	100.0%	13,148
NM	Reeves Generating Station	2010	1,031	9	14,455	100.0%	14,455
NM	Reeves Generating Station	2010	1,647	9	31,388	100.0%	31,388
NM	San Juan	2010	5,600	9	2,011,964	50.0%	1,005,982
NM	San Juan	2010	4,665	9	1,547,357	50.0%	773,679
NM	San Juan	2010	4,725	9	2,292,627	50.0%	1,146,314
NM	San Juan	2010	5,145	9	2,728,341	38.5%	1,050,411

Notes:

- 1 Emissions data is from the EPA Clean Air Markets - Data and Maps: Emissions webpage (<http://camddataandmaps.epa.gov/gdm/index.cfm>)
- 2 CO2 emissions data year-to-date is from January 1 to October 31, 2010.

Table 1. Year 2008 carbon dioxide emissions reported to the New Mexico Air Quality Bureau as required by regulations 20.2.73 NMAC and 20.2.87 NMAC. This table includes only sources that reported emissions of 25,000 metric tons or more. Smaller sources that are not included here accounted for less than 4% of reported emissions.

Although currently not subject to NMED greenhouse gas reporting, we believe there are a small number of sources that may emit 25,000 metric tons or more and would be included in the cap.

Owner/Operator and Facility	CO ₂ Emissions* (thousand metric tons)	Percent of Total
Electricity Generation		
Public Service Co of NM		51.53%
San Juan Generating Station	10,797.5	
Luna Energy Facility	905.8	
Afton Generating Station	329.2	
Lordsburg Generating Station	29.9	
Tri -State Generating		7.50%
Prewitt Escalante Generating Station	1,755.1	
Xcel Energy		5.09%
Cunningham Station	881.4	
Maddox Station	310.0	
El Paso Electric		1.97%
Rio Grande Generating Station	461.7	
City of Farmington		0.85%
Bluffview Power Plant	135.7	
Animas Plant	63.1	
Oil and Gas		
Williams Four Corners		9.20%
Milagro Cogeneration and Gas Plant	1,500.5	
Kutz Gas Plant	141.2	
El Cedro Gas Plant	100.5	
La Jara Compressor Station	82.2	
Lybrook Gas Plant	58.6	
Dogie Canyon Compressor Station	42.5	
32-8 No2 CDP Compressor Station	40.9	
32-7 CDP Compressor Station	40.3	
Trunk L Compressor Station	37.2	
Laguna Seca Compressor Station	29.8	
Chaco Compressor Station	26.3	
Cedar Hill Compressor Station	25.7	
Middle Mesa CDP Compressor Station	27.8	

Owner/Operator and Facility	CO₂ Emissions* (thousand metric tons)	Percent of Total
TEPPCO NGL Pipeline LLC Val Verde Treater Pump Canyon Compressor Station Frances Mesa Compressor Station Gobernador/Manzanares Compressor Station	1,340.2 41.7 30.5 44.9	6.23%
Enterprise Field Services LLC Chaco Gas Plant Blanco Compressor C and D Station Rattlesnake Canyon Compressor Station South Carlsbad Compressor Station	395.3 263.5 47.0 32.9	3.16%
Navajo Refining Navajo Refining - Artesia Refinery Lovington Refinery	624.2 93.8	3.07%
Versado Gas Processors, LLC Targa - Eunice Gas Plant Monument Gas Plant Saunders Gas Plant North Eunice Compressor Station	187.8 96.4 67.0 42.5	1.68%
DCP Midstream Artesia Gas Plant Eunice Gas Plant Linam Ranch Gas Plant	66.1 146.1 164.2	1.61%
Western Refining Ciniza Refinery Bloomfield Refinery	264.5 103.5	1.57%
Conoco Phillips San Juan Gas Plant East Vacuum Liquid Recovery Wingate Fractionation Plant	244.1 65.4 36.8	1.48%
El Paso Natural Gas Lordsburg Compressor Station Florida Compressor Station Eunice A Compressor Station Monument Compressor Station Afton Compressor Station Pecos River Compressor Station	61.3 45.8 41.5 38.6 35.0 81.1	1.30%

Owner/Operator and Facility	CO₂ Emissions* (thousand metric tons)	Percent of Total
Southern Union Gas Limited Jal No3 Gas Plant	226.8	0.97%
OXY USA WTP Limited Partnership Indian Basin Gas Plant	111.3	0.48%
Intrepid Potash New Mexico LLC East KCI Compaction	106.6	0.46%
Freeport-McMoRan Chino Mines Co Chino Mine - Hurley Facility	87.8	0.38%
Davis Gas Processing Denton Gas Plant	64.3	0.27%
Western Gas Resources San Juan River Gas Plant	62.1	0.27%
Mosaic Potash Carlsbad Inc Mosaic Potash Carlsbad Inc	43.6	0.19%
Frontier Field Services LLC Empire Abo Gas Plant	40.6	0.17%
Other		
DairiConcepts LLC Portales	50.7	0.22%
American Gypsum Bernalillo (Wallboard) Plant	32.1	0.14%
US DOE Los Alamos National Laboratory	31.2	0.13%
State of New Mexico New Mexico State University Campus	26.8	0.11%
Total from sources ≥ 25K metric tons	23,408.9	100.00%

*Methane emissions were not required to be reported for the 2008 emissions year. Vented CO₂ emissions from some gas treatment and processing plants may be underestimated. The above list may not be inclusive of all sources potentially subject to the cap. It's also possible that reporting or data transfer errors may result in a source listed above not being included in the cap.

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