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April 1, 2026

**Via PRCe360 e-Filing & Case Management System**

Ms. Melanie Sandoval  
Records Bureau Chief

Subject: ***Public Service Company of New Mexico's Wildfire Mitigation Plan 2026 and Public Safety Power Shutoff Plan***

Dear Ms. Sandoval:

Public Service Company of New Mexico ("PNM") hereby submits its revised Wildfire Mitigation Plan for 2026 – Attachment 1. PNM also includes, for informational purposes, a copy of its Public Safety Power Shutoff ("PSPS") Plan – Attachment 2, which is referenced in the Wildfire Mitigation Plan. The PSPS Plan is also being separately filed with the Commission in compliance with 17.9.560.15(F) NMAC – Curtailment of Service Plan, and Paragraph 11 of the Final Order issued in NMPRC Docket No. 12-00089-UT ("Final Order"). Rule 17.9.560.15(F) NMAC requires utilities to periodically review and update curtailment plans and to file public summary versions of those plans with the Commission for information purposes.

If you have any questions or need further information in this regard, please contact me at [anne.haskins@pnm.com](mailto:anne.haskins@pnm.com).

Respectfully submitted,

*/s/ Anne Haskins*

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Cc: COS for Case No. 22-00154-UT  
Commission Chair Gabriel Aguilera - NMPRC  
Commissioner Patrick O'Connell – NMPRC  
Commissioner Erik Nibert - NMPRC

GCG#535073

# Attachment 1

PNM Wildfire Mitigation Plan

# WMP

# Wildfire Mitigation Plan 2026

Document Approval:

Omni Warner

Date: 03/31/2026

Omni Warner  
Senior Vice President PNM-NM Operations

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# TABLE OF CONTENTS

- 1. Prelude ..... 1
  - 1.1. Changes from the 2025 WMP ..... 3
  - 1.2. 2025 Wildfire Summary ..... 4
- 2. Introduction ..... 5
  - 2.1. Purpose and Objectives ..... 5
    - 2.1.1. Overview of PNM ..... 5
- 3. Risk Analysis and Identification of High Fire Risk Areas (HFRAs) ..... 8
  - 3.1. Service Territory Risk Assessment ..... 8
    - 3.1.1. Tier Definitions ..... 8
    - 3.1.2. Use of Artificial Intelligence (AI) ..... 9
  - 3.2. Application of HFRAs for Ongoing Activities ..... 13
    - 3.2.1. Focusing on SA of Fire Weather ..... 13
    - 3.2.2. System Operation Decisions During Critical Fire Weather ..... 13
    - 3.2.3. Fieldwork Restrictions During Critical Fire Weather ..... 14
    - 3.2.4. Enhanced Inspection and Maintenance Activities ..... 14
    - 3.2.5. Fire Hardening Activities ..... 14
    - 3.2.6. Educating and Collaborating with External Partners and Stakeholders ..... 14
    - 3.2.7. Siting New Facilities and Following Wildfire Mitigation Guidelines for Distribution Designers Working in HFRAs ..... 16
    - 3.2.8. Guiding Business Decision-Making Processes ..... 16
  - 3.3. Maintaining PNM’s HFRA Geographic Information Layer ..... 16
    - 3.3.1. HFRA Refinement and Sub-Zoning ..... 17
  - 3.4. Substation Assessment ..... 17
- 4. Overview of Preventative Programs and Strategies ..... 18
  - 4.1. Remotely Sensed Data Collection ..... 18
    - 4.1.1. Light Detection and Ranging (LiDAR) and Imagery ..... 18
    - 4.1.2. Use of Satellite Imagery ..... 18
    - 4.1.3. Unmanned Aerial Systems (UAS) ..... 18
  - 4.2. Vegetation Management (VM) in HFRAs ..... 19

- 4.2.1. VM Program Overview ..... 19
  - 4.2.1.1. Transmission ..... 19
  - 4.2.1.2. Distribution ..... 20
  - 4.2.1.3. VM Metrics for T&D ..... 20
  - 4.2.1.4. Enhanced Inspections/Clearing ..... 20
  - 4.2.1.5. Requirements for Contracted Tree Crews ..... 20
- 4.2.2. VM Plan Advancement for Wildfire Risk Mitigation ..... 20
- 4.2.3. Tree Risk Assessment / Analysis App Description ..... 21
- 4.3. Inspection, Inventorying, and Maintenance of Overhead Lines ..... 22
  - 4.3.1. Virtual Inspections ..... 22
    - 4.3.1.1. Asset Inventory ..... 22
  - 4.3.2. Wood Pole Test and Treat Program ..... 22
  - 4.3.3. Aerial Patrols of NERC Transmission Lines ..... 22
  - 4.3.4. Aerial and Ground Patrols of Non-NERC Transmission Lines ..... 22
  - 4.3.5. Asset Inspections During VM Patrols ..... 23
  - 4.3.6. Corrective Maintenance ..... 23
  - 4.3.7. Inspection / Maintenance Data Collection and Management System ..... 23
- 4.4. Overhead Power Delivery Infrastructure Advancements ..... 23
  - 4.4.1. Line Design, Construction, Retrofitting, and Operating Enhancements for HFRA's ..... 24
    - 4.4.1.1. Communications Infrastructure and Electrical Devices ..... 24
      - 4.4.1.1.1. Communications Infrastructure ..... 24
      - 4.4.1.1.2. Capacitor Banks ..... 24
      - 4.4.1.1.3. Reclosers, Relays, and Fault Locating Sensors ..... 24
      - 4.4.1.1.4. Switches ..... 24
      - 4.4.1.1.5. Fuses and Lightning Arresters ..... 25
      - 4.4.1.1.6. Enhanced Protection Schemes and Protection Coordination ..... 25
      - 4.4.1.1.7. Transformers with Internal Fault Detectors (IFD) ..... 25
      - 4.4.1.1.8. Fault Protection for Transformers ..... 25
      - 4.4.1.1.9. Covering for Wire Jumpers ..... 26
    - 4.4.1.2. Wildlife Protection ..... 26
    - 4.4.1.3. Poles, Conductors, Crossarms, Construction, and Hardware ..... 27

4.4.1.3.1.	Poles.....	27
4.4.1.3.2.	Covered Primary Wire/Tree Wire .....	27
4.4.1.3.3.	Open Wire Secondary.....	27
4.4.1.3.4.	Crossarms.....	28
4.4.1.3.5.	Primary Connectors .....	28
4.4.1.3.6.	Guy Strain Insulators.....	28
4.4.1.3.7.	Equipment Locations .....	28
4.4.2.	Industry R&D, Emerging Practices, and Continuous Improvement.....	28
5.	Escalating Fire Weather and Operational Strategies.....	29
5.1.	Operational Awareness .....	29
5.1.1.	Indji Watch .....	29
5.2.	Daily Situational Awareness (SA).....	30
5.3.	Fire Operating Conditions.....	31
5.4.	Wildfire Conditions and Red Flag Warnings at PNM .....	34
5.4.1.	Wildfire Conditions.....	34
5.4.2.	Red Flag Warning (RFW).....	34
5.4.3.	Wildfire Safety Mode (WSM) .....	37
5.4.4.	Reclosing Protocol .....	38
6.	Power Safety Power Shutoff (PSPS) Overview .....	39
7.	Annual Fire Prevention and Fire Safety Training .....	40
7.1.	Annual Training.....	40
7.1.1.	Use of the Fire Operating Condition Forecast.....	40
7.1.2.	Protocols During RFWs.....	40
7.1.3.	Ignition Prevention Measures .....	40
7.1.4.	Tailboard Safety Plans.....	40
7.1.5.	Fundamentals of Fire Physics and Behavior .....	40
7.1.6.	Fire Tool Requirements and Safe Usage .....	40
7.1.7.	Personnel Safety Protocols for Working In or Near Fire Areas.....	41
7.1.8.	Basic Principles of the Incident Command System (ICS) .....	41
7.2.	Encroachment.....	41
7.2.1.	Fire Watch / Monitoring.....	41

- 7.2.2. Fire Watch Reporting Tool ..... 41
- 7.2.3. First Responder De-Energization Requests ..... 42
- 7.2.4. De-Energization Decision Process ..... 42
- 7.2.5. De-Energization Considerations ..... 42
- 7.2.6. Re-Energization ..... 42
- 8. Emergency Preparedness..... 43
  - 8.1. Outreach and Education: Customer Communities, Local, State, Federal Government, Regulatory, and Tribal Government ..... 43
  - 8.2. Communication and Collaboration..... 44
    - 8.2.1. Pre-Incident..... 44
    - 8.2.2. During an Incident..... 44
- 9. Support During Wildfire Incidents ..... 45
  - 9.1. Corporate Communications..... 45
  - 9.2. Customer Support..... 46
    - 9.2.1. Low-Income Customer Support..... 46
- 10. Year-End Recap: Wildfire Projects and Activities ..... 47
- 11. 2026 and Beyond ..... 48
  - 11.1. Pilot Projects Continuing Through 2026 ..... 48
- 12. Conclusion..... 49

# LIST OF FIGURES

Figure 1. PNM Service Areas ..... 7  
Figure 2. PNM HFRA, USFS National Forest Land Boundaries, and Fire Weather Zones..... 11  
Figure 3. T&D Miles Inside/Outside HFRA..... 13  
Figure 4. Sample Daily SA Report..... 30  
Figure 5. Sample RFW ..... 35  
Figure 6. NWS Forecasting Offices Map ..... 36

# LIST OF TABLES

Table 1. WMP Changelog (By Year) ..... 3  
Table 2. Athena Attributes and Descriptions..... 9  
Table 3. HFRA Names and Characteristics..... 12  
Table 4. HFRA GIS Shapefile Attributes and Descriptions ..... 17  
Table 5. Job Site Operating Conditions Considerations..... 31  
Table 6. Mitigations for Operating Conditions in Fire-Prone Areas\* ..... 32  
Table 7. RFW Impact on System Operations ..... 35

# LIST OF APPENDICES

APPENDIX A..... 50  
    HIGH FIRE RISK AREA MAPS..... 50  
APPENDIX B ..... 67  
    PNM WMP – TECHNICAL GLOSSARY ..... 67  
APPENDIX C ..... 74  
    PNM WMP – NEW MEXICO GEOGRAPHY, FLORA, AND CLIMATE ..... 74  
APPENDIX D..... 77  
    PNM WMP – WILDFIRE MITIGATION VEGETATION MANAGEMENT AND INFRASTRUCTURE  
    MAINTENANCE EXPENSE 2025 ANNUAL REPORT ..... 77

# ACRONYMS & ABBREVIATIONS

AI	Artificial Intelligence
APP	Avian Protection Plan
BLM	Bureau of Land Management
CMR	Crisis Management and Resilience
CSP	Completely Self-Protected Transformer
CWA	County Warning Area
DGIS	Drafting and Geographic Information System Department
DOC	Distribution Operations Center
DOE	Department of Energy
DSC	Distribution Standards Committee
DTECH	DistribuTech
EI	Edison Electric Institute
EOC	Emergency Operations Center
EMNRD	Energy, Minerals and Natural Resources Department
EPRI	Electric Power Research Institute
FAC	NERC Vegetation Management Reliability Standard
FERC	Federal Energy Regulatory Commission
Fire Hx	Fire History
FOC	Fire Operating Condition
FOCF	Fire Operating Condition Forecast
FWW	Fire Weather Watch
FWZ	Fire Weather Zone
GIS	Geographic Information System
HFRA	High Fire Risk Area
ICS	Incident Command System

PNM – WMP 2026

IFD	Internal Fault Detector
IPRA	Inspection of Public Records Act
IVM	Integrated Vegetation Management
kV	Kilovolt
LCD	Line Current Differential
LiDAR	Light Detection and Ranging
NERC	North American Electric Reliability Corporation
NESC	National Electric Safety Code
NFDRS	National Fire Danger Rating System
NMDHSEM	New Mexico Department of Homeland Security and Emergency Management
NMPRC	New Mexico Public Regulation Commission
NWS	National Weather Service
OMS	Outage Management System
PIO	Public Information Officer
POTT	Permissive Overreaching Transfer Trip
PPE	Personal Protective Equipment
PSA	Predictive Service Area
PSPS	Public Safety Power Shutoff
PWOPS	Power Operations Department
RFW	Red Flag Warning
ROW	Right-of-Way
R&D	Research and Development
SA	Situational Awareness
SCADA	Supervisory Control and Data Acquisition
SLO	State Land Office
T&D	Transmission and Distribution
UAS	Unmanned Aerial System

PNM – WMP 2026

USFS	United States Forest Service
UTRA	Utility Tree Risk Assessment
VM	Vegetation Management
WECC	Western Electricity Coordinating Council
WHP	Wildfire Hazard Potential
WMP	Wildfire Mitigation Plan
WSM	Wildfire Safety Mode
WUI	Wildland Urban Interface

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## 1. Prelude

As climate and weather conditions continue to alter the landscape, the Public Service Company of New Mexico (PNM) evolves and strengthens its mitigation plans to support the safety of communities, customers, and employees, while maintaining energy reliability and its commitment to serving increasingly clean energy. PNM's annual Wildfire Mitigation Plan (hereafter referred to as the WMP) enhancements emphasize:

- Continuous improvement and drive toward more real-time, localized, situational awareness (SA).
- Proactive Vegetation Management (VM) work.
- Hardening of the electrical system and ignition reduction practices.
- Collaboration with stakeholders to seek input on how we can best communicate and alert customers and communities about wildfire and wildfire risk.

The WMP is reviewed and revised annually before March. This WMP provides information on PNM's progress and work to date, along with advancement toward our mitigation objectives. The document is available on [PNM.com/wildfire-safety](https://www.pnm.com/wildfire-safety).

In 2025, PNM continued to improve and evolve its wildfire and risk mitigation program. Some notable updates include:

- Sited 66 weather stations throughout New Mexico.
- Installed eight 24/7 AI-ML ignition detection cameras, with human validation in Santa Fe (two) and Silver City (six).
- Refined Power Safety Power Shutoff (PSPS) engagement with government and industry entities, the public, and electric utility peers.
- Conducted remotely sensed data collection throughout its High Fire Risk Areas (HFRAs), including the collection of high-resolution imagery and Light Detection and Ranging (LiDAR), which is being used to implement multiple WMP recommendations.
- Created specific and targeted operations and maintenance practices, system hardening programs, VM, and field personnel practices to mitigate wildfire risk.
- Increased SA of escalating fire weather conditions and augmented existing plans to reduce ignition likelihood from system operations and field work.
- Revised-updated fire classification scheme that will govern response, internal reporting, and external communications during wildfire events.
- Implemented a formal 'Fire Watch' reporting process.

PNM – WMP 2026

- Continued to capture and analyze outage data for use in developing effective risk reduction strategies.
- Implemented Ignition tracking.
- Proactively de-energized electrical facilities on April 17, 2025, in Las Vegas, as part of its PSPS process and re-energized the community within 12-hours of de-energization.
- Continued implementation and evaluation of pilot projects to reduce ignitions.
- Implemented an Encroachment practice.
- Implemented process-log table to WMP for substantive document changes from year to year.
- WMP and PSPS documents are now signed by the SVP of New Mexico Operations (NM Ops), annually prior to submission to the New Mexico Public Regulation Commission (NMPRC).

### 1.1. Changes from the 2025 WMP

**Table 1. WMP Changelog (By Year)**

<b>WMP Version [Year]</b>	<b>Original Content / Reference</b>	<b>Changed [Year]</b>	<b>Revised Content</b>	<b>Justification</b>	<b>Approved By <i>*Overall approval granted by PNM SVP-NM Ops</i></b>
<b>2025</b>	No changelog in WMP	2026	Changelog introduced and data will be maintained and revised annually	Year-to-year changes are made easier for readers to view at a glance.	Wildfire Dept.
<b>2025</b>	Sandia Heights HFRA boundary	2026	Sandia Heights HFRA boundary revised	Landscape does not present high fire risk in PNM’s service territory. Athena and Wildfire Hazard Potential (WHP) dataset show low to moderate at low resolutions. Fire station in proximity to Paseo Del Norte. Urban infrastructure like streets, sidewalks, and walls deter fire spread.	GIS Wildfire Dept.
<b>2025</b>	Clayton HFRA	2026	Clayton West and East become ‘Clayton’ as Clayton East is removed	Clayton East inclusion is an artifact and has NO asset infrastructure to consider in risk assessment.	GIS Wildfire Dept.
<b>2025</b>	No document approval captured by signature line	2026	Document approval signature line added	Additional transparency and ownership-approval of document.	Wildfire Dept.
<b>2025</b>	Not included: NMPRC financial filing for Wildfire and Vegetation spending	2026	Financial filing to be included in the PSPS (annual filing)	The NMPRC financial filing of wildfire and vegetation spend is filed separately in January.	Wildfire Dept.

## 1.2. 2025 Wildfire Summary

While the majority of New Mexico wildfire incidents reported in 2025 were lightning-caused, extreme drought conditions and early-year winds exacerbated fire spread.<sup>1</sup> A few of 2025's notable fires are described below.

- In mid-June, two significant fires—the Trout Fire and the Buck Fire—burned more than 80,000 acres combined north of Silver City. These fires prompted the Governor to declare an emergency.<sup>2</sup>
- The Desert Willow Complex Fire, comprising the Cotton 1 and Cotton 2 Fires, ignited on Saturday, June 21, 2025, in the Bosque area around Los Lunas, New Mexico.<sup>3</sup> It burned on both the west and east sides of the Rio Grande River and destroyed or damaged 14-16 homes. It is included here given the amount of damage it caused for its relatively small footprint of a combined 237 acres for both fires.<sup>4</sup>
- The Energy, Minerals, and Natural Resources Department reported 783 total wildfires suppressed in all jurisdictions in calendar year 2025. Of the 783 fires suppressed, 398 of them were human-caused.<sup>5</sup>

These fires underscore the importance of adopting an effective approach to wildfire risk mitigation that emphasizes continuous improvement and coordination across all levels of government—local, state, federal, and Tribal—as well as with communities, their residents, and businesses.

Looking ahead, PNM remains committed to supporting community safety and resilience through:

- Robust engagement with first responders and emergency response organizations.
- Ongoing data collection and validation of facility and infrastructure information.
- Strengthening community relationships and awareness of the access and functional needs of the population/community members.
- Delivering proactive notifications and communication (pre, during, and post events).
- Hosting and/or maintaining active participation in annual training and tabletop exercises.

PNM will continue to partner with stakeholders across New Mexico to strengthen wildfire preparedness and advance risk mitigation strategies that protect people, property, culture, and infrastructure.

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<sup>1</sup> <https://science.nasa.gov/earth/earth-observatory/new-mexico-battles-wildfires-154454/>

<sup>2</sup> <https://www.governor.state.nm.us/2025/06/17/governor-declares-emergency-secures-federal-resources-for-trout-fire-response/>

<sup>3</sup> <https://www.koat.com/article/desert-willow-complex-fires-new-mexico/65162295>

<sup>4</sup> <https://nmfireinfo.com/2025/06/24/desert-willow-complex-fire-update-6-24-25/>

<sup>5</sup> <https://www.emnrd.nm.gov/wp-content/uploads/EMNRD-2025-AR-final.pdf#page=15>

## 2. Introduction

In recent years, the western United States has seen an increase in damaging wildfire activity. Both climatologists and fire scientists anticipate longer stretches of wildfire activity and increasingly extreme fire behavior in future years, due to changing climate conditions.<sup>6</sup> Other important risk factors include human encroachment, historical land management practices, and the health of wildlands and forests. Dynamic climate conditions require new coping strategies.

To address these climatic conditions and the associated elevated risks of wildfires, PNM prepares this annually filed WMP. The WMP covers wildfire risk drivers, programs, and strategies to mitigate them.

PNM recognizes that an effective wildfire strategy depends upon a culture that treats safety and reliability as inseparable elements of operational excellence. PNM has prepared this WMP as part of an organizational philosophy. The key topics include grid design and system hardening, asset management and inspection, daily SA and forecasting, operational response, VM, and risk-spend efficiency.

### 2.1. Purpose and Objectives

The WMP outlines PNM's commitment to protecting communities, natural resources, and critical infrastructure from electrical-causing wildfires. The WMP details strategies to prevent electrical-caused ignitions, strengthen system resiliency, and safeguard public safety. It reflects PNM's fire-safe culture through transparent risk assessment, adaptive planning, and the use of advanced technologies. The WMP is updated regularly to incorporate evolving science, data-driven insights, and stakeholder input as the wildfire mitigation program matures.

This WMP provides details on PNM's current wildfire prevention efforts. It is not intended to be aspirational, nor to address yet-to-be initiated projects or activities. Any forward-looking statements are not a guarantee of future performance or project initiation. Statements and details on PNM wildfire prevention activities are current as of Q1 of 2026.

#### 2.1.1. Overview of PNM

PNM has been serving the people and businesses of New Mexico since 1917. As the state's largest electricity provider, PNM plays a critical role in delivering safe, reliable, affordable, and clean power to more than 550,000 residential and commercial customers across a broad and diverse service area. The company is responsible for the full spectrum of electric utility functions, including power generation, high-voltage transmission, and local distribution.

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<sup>6</sup> <https://science.nasa.gov/earth/explore/wildfires-and-climate-change/>

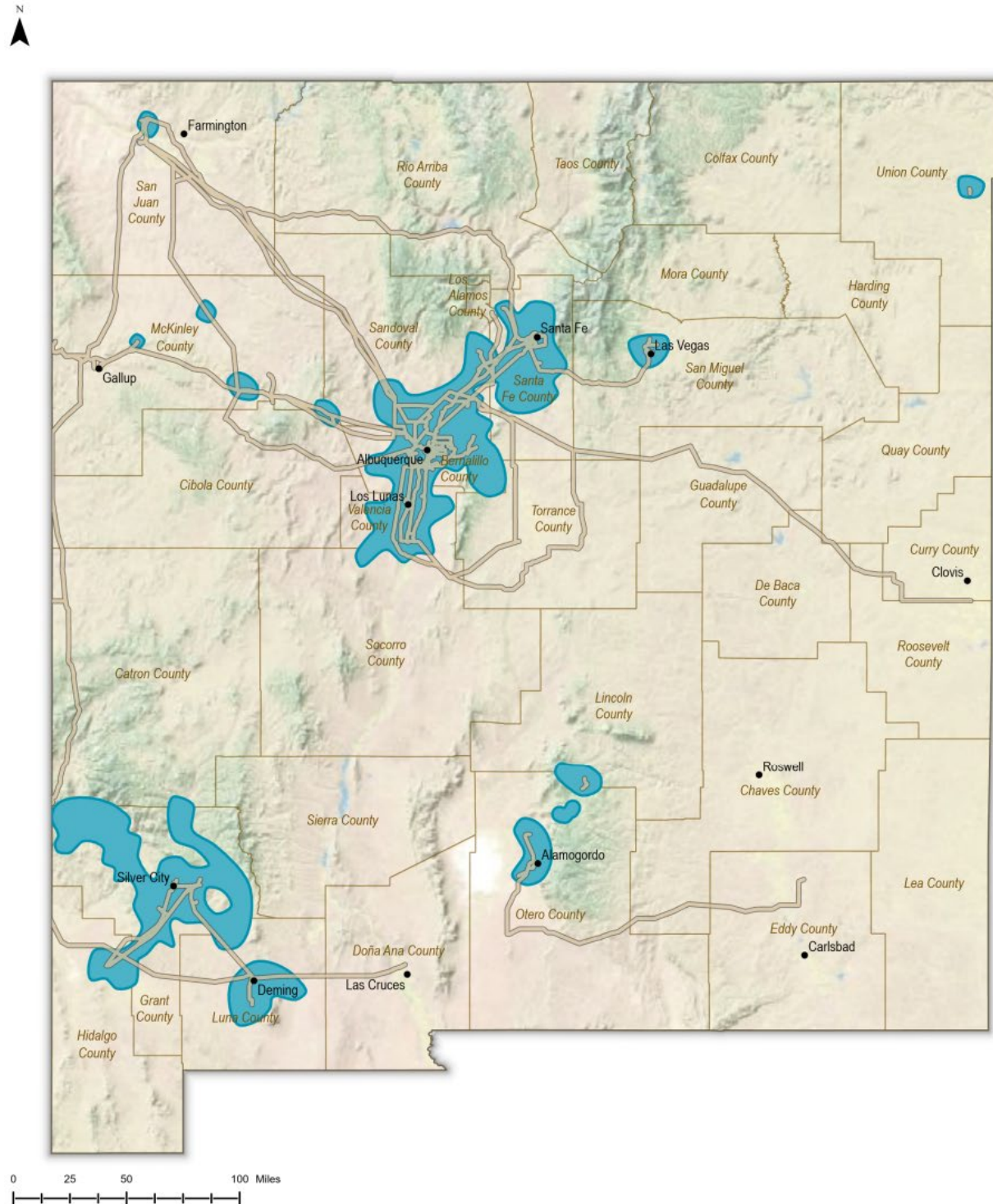
PNM operates under the oversight of the Federal Energy Regulatory Commission (FERC) and the NMPRC, and is committed to meeting stringent regulatory, safety, and environmental standards. Headquartered in Albuquerque, PNM serves numerous communities throughout the state, including:

- **Urban and suburban centers:** Albuquerque, Rio Rancho, Los Lunas, Belen, and Santa Fe.
- **Rural towns and smaller municipalities:** Las Vegas, Alamogordo, Ruidoso, Silver City, Deming, Bayard, Lordsburg, and Clayton.
- **Native American Tribal lands:** Including the Tesuque, Cochiti, Santo Domingo, San Felipe, Santa Ana, Sandia, Isleta, and Laguna Pueblos.

PNM recognizes the need to proactively manage wildfire risk associated with electric utility infrastructure. This WMP outlines the utility's comprehensive approach to reducing the potential for electric equipment to ignite wildland fires, and to strengthen the resilience of the electrical grid in the face of wildfire threats.


This WMP applies specifically to PNM-owned and operated facilities located within the state of New Mexico (see **Figure 1**). It reflects the company's commitment to protecting lives, property, and critical natural resources through strategic planning, data-informed decision-making, and ongoing collaboration with state and federal agencies, Tribal governments, emergency responders, and the public.

Figure 1. PNM Service Areas



**PNM Approximate Customer Service Areas and Transmission Infrastructure**  
2025

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### 3. Risk Analysis and Identification of High Fire Risk Areas (HFRAs)

#### 3.1. Service Territory Risk Assessment

PNM continues to assess its wildfire risks and mitigation efforts and to seek additional opportunities to apply practices and strategies to further reduce wildfire risks. The results of these efforts inform the practices, procedures, and recommendations that comprise this WMP. PNM's risk assessment methodology is consistent with conventional definitions of risk, which include an event's probability and the potential for negative consequences.

A landscape-level assessment of wildfire potential is essential to understanding wildfire risk. Using historic fire perimeter data from New Mexico state resources, Geographic Information Systems (GIS) and Artificial Intelligence (AI), PNM completed an assessment of wildfire risk across its service area to identify locations of highest risk. These areas are called High Fire Risk Areas (HFRAs) (see **Figure 2**). HFRAs represent areas of risk driven largely by hazardous fuel conditions; consequently, they represent areas where fire ignitions present elevated potential for asset-related wildfire damage, as well as areas where PNM facilities are at highest threat from fires of outside origin (non-electrical ignitions).

##### 3.1.1. Tier Definitions

HFRAs consist of both Tier 1 and Tier 2 areas, with Tier 2 being higher risk than Tier 1 areas due to the following:

Tier 1 areas include urban and other landscapes where ignitions are less likely to spread given fuel discontinuity, human development, and faster fire department response times.

Tier 2 areas comprise the bulk of the land within the HFRA boundaries and are defined as areas where utility infrastructure (such as power lines and substations) are vulnerable to wildfire and where ignitions may cause damaging wildfires. These tiers are used by PNM, along with any relevant operational criteria, in a variety of circumstances. For example, existing Tier 1 and Tier 2 boundaries are a contributing factor in plans surrounding PNM's ongoing sectionalizing efforts. These efforts are critical to reduce the impact of PSPS and Wildfire Safety Mode (WSM) related recloser settings on PNM's customer base, both in terms of the number of customers affected and the duration of resulting outages.

PNM evaluates existing Tier 1 and Tier 2 boundaries on an as-needed basis. These evaluations will continue to be necessary as human development increases and the wildland-urban interface continues to expand and change. AI aided in the delineation of Tier 1 and Tier 2 distinctions (described in the following section).

### 3.1.2. Use of Artificial Intelligence (AI)

In the spring of 2024, PNM began incorporating data from Athena Intelligence™ (Athena) to enhance its landscape hazard assessment capabilities. Athena leverages artificial intelligence and machine learning to integrate and analyze a wide range of publicly available, validated datasets. These datasets are used to generate risk scores aligned with modeled fire behavior profiles, providing a data-driven basis for identifying areas of elevated wildfire risk (see **Table 2**).

One of the initial applications of Athena data was to verify and refine PNM’s original Urban Exclusion Zones, which were later formalized as Tier 1 areas. In addition, Athena’s insights have supported the strategic placement of sectionalizing equipment, contributing to more targeted and effective PSPS planning and implementation.

To maintain current and relevant data, PNM receives quarterly updates from Athena, ensuring that wildfire risk assessments and operational decisions are based on the most up-to-date information available. HFRA’s are reviewed annually, and mapping changes are made every two years (where applicable). Risk areas are reviewed and finalized using Athena Intelligence, with consideration of ongoing and completed wildfire mitigation projects and activities.

Detailed maps of each HFRA are provided in **Appendix A**.

**Table 2. Athena Attributes and Descriptions**

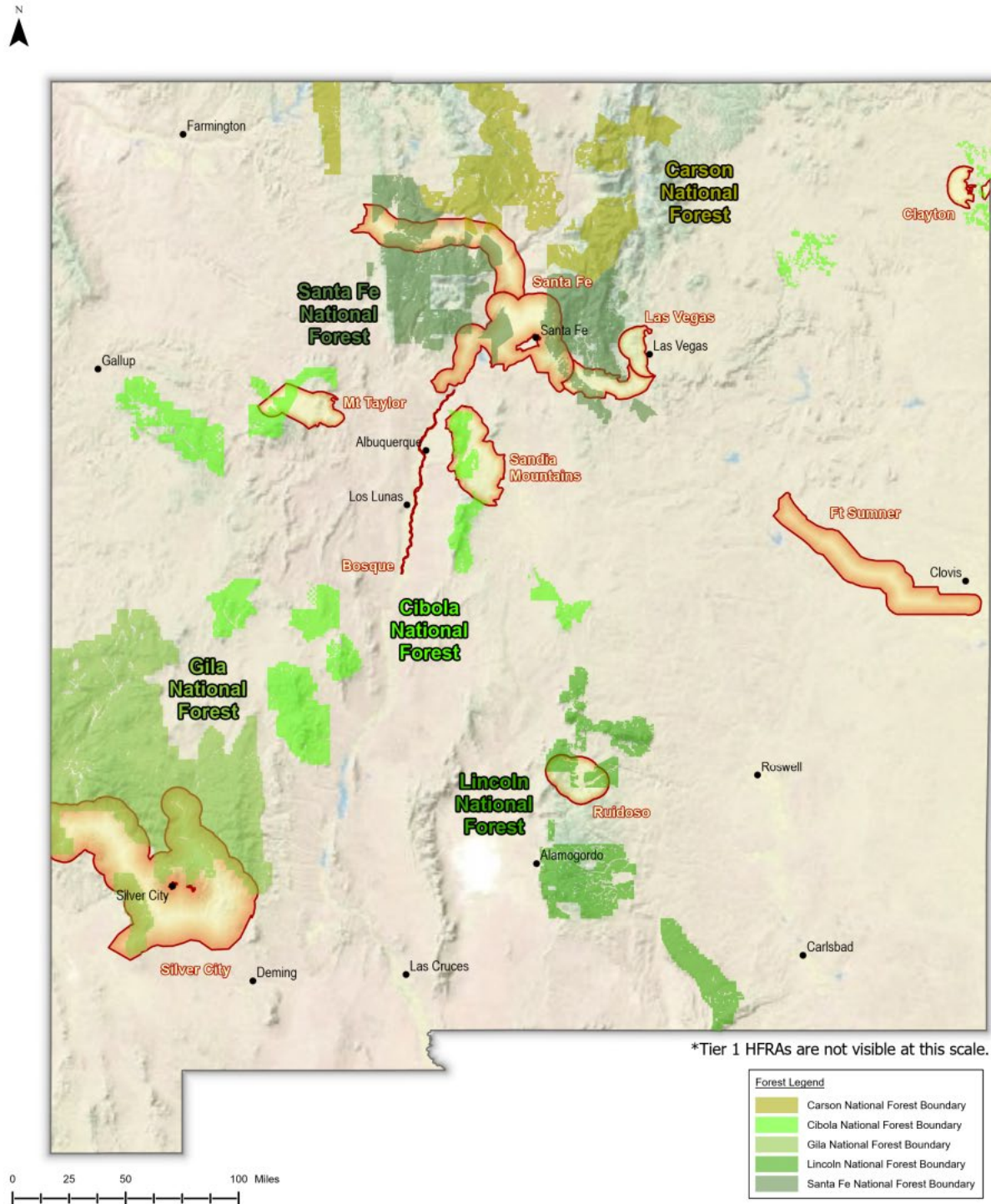
Attribute	Description
<b>County</b>	County where the profile polygon exists.
<b>BLK</b>	Census block identification.
<b>WUI Class</b>	Designation of housing density and its proximity to wildland fuels.
<b>BLK_ID</b>	Combination of the three above.
<b>Conditional Risk</b>	A ranking of very low to very high that describes an area’s potential to host a wildfire.
<b>Conditional Risk Score</b>	Ranges from 1-16.
<b>Locational Risk Score</b>	Ranges from 2-34.
<b>Combined Risk</b>	Six class ranking from very low to very high that combines conditional and probability scores.
<b>Burn Probability</b>	Ranges from very low to very high and describes the probability of a wildfire’s occurrence at a given location.
<b>Risk Score</b>	Range from 2-10. Combination of conditional risk and probability risk.
<b>Risk Units</b>	Ranges from 1-48.

In addition to the HFRA, **Figure 2** depicts the United States Forest Service (USFS) boundaries for National Forest Lands and National Weather Service (NWS) Fire Weather Zones (FWZ).

FWZs are areas with similar climate, weather, and terrain characteristics. There are 21 FWZs in New Mexico, 13 of which intersect PNM's HFRA. The NWS issues Red Flag Warnings (RFW) per FWZ.

The overlap between the HFRA and National Forest Lands is important because PNM has active Special Use Permits in those areas and special operating conditions apply. Further, although not depicted in **Figure 2**, PNM has permits from the Bureau of Land Management (BLM) and New Mexico State Land Office (SLO). These areas also have their own special operating conditions.

**Figure 2. PNM HFRAs, USFS National Forest Land Boundaries, and Fire Weather Zones**



### PNM HFRAs with USFS National Forest Boundaries

2025

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**Table 3** lists the 11 identified PNM HFRA and some of their characteristics. PNM periodically reviews and updates HFRA boundaries, as necessary.

**Table 3. HFRA Names and Characteristics**

HFRA Name	Type of facility	Area (Sq. mi.)	FWZ <sup>7</sup>	Predictive service area <sup>8</sup> (PSA) (primary)	PNM Division
<b>Bosque<sup>9</sup></b>	T&D	29	NM 106	SW09 South/Central NM Lowlands	Sandoval Albuquerque Valencia
<b>Clayton</b>	T&D	97	NM 104	SW13 Northeast NM/NW TX	Clayton
<b>Fort Sumner 3</b>	Transmission	819	NM 125 & 126	SW13 Northeast NM/NW TX	Eastern NM
<b>Las Vegas</b>	T&D	135	NM 122 & 123	SW10 Sangre de Cristo Mtns	Las Vegas
<b>Mt. Taylor</b>	T&D	296	NM 105	SW07 Northwest NM Mtns	Ambrosia Lake Marquez
<b>Ruidoso</b>	T&D	312	NM 113	SW12 South/Central NM Mountains	Ruidoso
<b>Sandia Mtns</b>	T&D	482	NM 106 & 124	SW11 Central NM Mtns & Plains	East Mountain
<b>Santa Fe</b>	T&D	961	NM 105, 106 & 121	SW10 Sangre de Cristo Mtns SW07 Northwest NM Mtns	Santa Fe
<b>Santa Fe East</b>	Transmission	251	NM 124 & 126	SW10 Sangre de Cristo Mtns	Santa Fe
<b>Santa Fe North</b>	T&D	704	NM 120 & 121	SW07 Northwest NM Mtns	Santa Fe
<b>Silver City</b>	T&D	2824	NM 110	SW08 White Mtns & Gila Region	Silver City

<sup>7</sup> From the NWS: *This data set is used to delineate the Fire Weather Zones that are used by NWS in the fire weather forecast program.* These are areas of generally homogenous fire weather. Fire Weather Watches, Red Flag Fire Weather Warnings (RFW) and their attendant alerts are issued by NWS Fire Zone. Knowing which Fire Weather Zone is coincident with a particular HFRA is critical when making operational decisions.

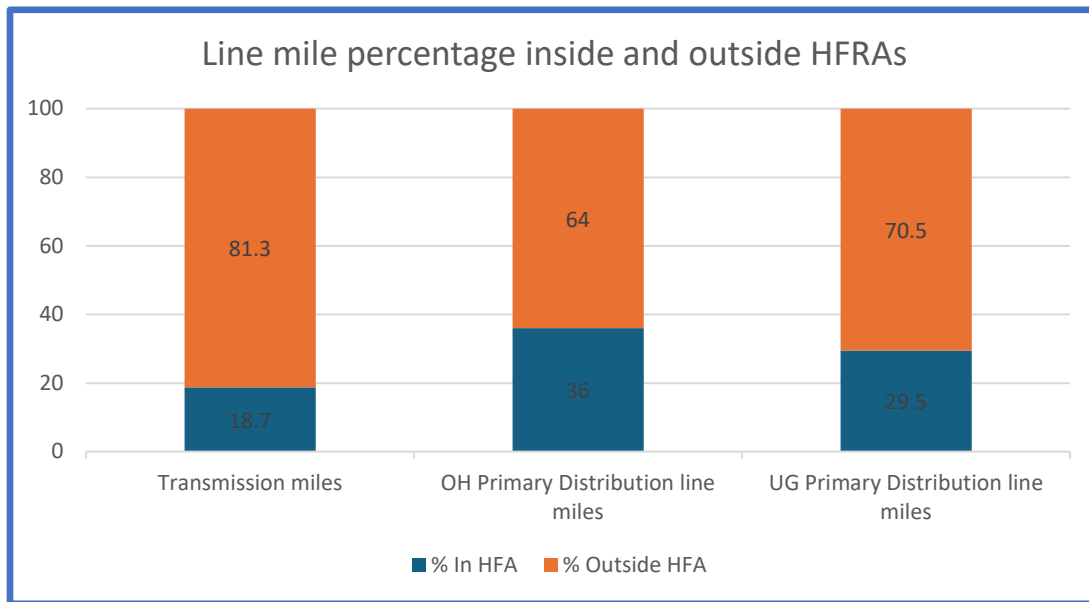
<sup>8</sup> PSAs are geographic areas for which national-level fire weather or fire danger services and products are produced by wildland fire agencies for the support of resource allocation and prioritization functions.

<sup>9</sup> The Bosque was included as an HFRA due to the proximity of abundant fuel load and human development to PNM facilities. This riparian area is dense with cottonwood trees and adjacent to residential developments.

Throughout the year, PNM adds, remediates, and rebuilds transmission and distribution (T&D) structures to safely and reliably serve its 550,000 customers across its service territories. **Figure 3** shows the expansive percentages of primary T&D line miles, along with percentages of underground primary distribution line that are within, and outside of, PNM’s HFRA.

PNM’s HFRA affect approximately 36% of our distribution line miles and approximately 19% of transmission line miles. This requires substantial planning and investment to strategically work towards mitigating wildfire risk throughout the HFRA.

**Figure 3. T&D Miles Inside/Outside HFRA**



### 3.2. Application of HFRA for Ongoing Activities

PNM’s HFRA are used to inform short- and longer-term planning, prioritization, scheduling, and/or budgeting for functions, including those detailed in the following sections.

#### 3.2.1. Focusing on SA of Fire Weather

Among other activities, PNM is actively expanding its SA capabilities by installing multiple weather monitoring stations and a network of AI-enabled ignition detection cameras, with human validators. These cameras detect smoke from ignitions within their viewshed, prompting vendor alerts to local fire and/or emergency responders.

#### 3.2.2. System Operation Decisions During Critical Fire Weather

PNM’s Wildfire, Operations, and Engineering departments utilize the SA tools mentioned above, as well as other resources to enact WSM settings or PSPS activities.

### 3.2.3. Fieldwork Restrictions During Critical Fire Weather

PNM utilizes a suite of SA tools (further discussed in **Section 5.2**) to identify days where a confluence of factors (fuel bed moisture, temperature, humidity, predicted wind speeds, etc.) creates an unacceptable risk and requires field personnel to modify or halt field activities, depending on the risk inherent to those activities.

### 3.2.4. Enhanced Inspection and Maintenance Activities

The HFRA provides PNM operational and planning personnel with clear, distinct boundaries of increased risk and enable personnel to target operations and maintenance activities and budgets to these areas with the intent of risk reduction. These activities are further discussed in **Section 4.3**.

### 3.2.5. Fire Hardening Activities

Fire hardening activities include, but are not limited to, activities such as installing taller, stronger poles in the HFRA that will be more resistant to extreme weather conditions, and potentially more resilient if exposed to wildfire.

### 3.2.6. Educating and Collaborating with External Partners and Stakeholders

This includes abutting electric utilities, and local, state, Tribal, and federal firefighting agencies. PNM conducts regular, large-scale PSPS tabletop exercises ahead of wildfire season with state agencies and key partners, including the New Mexico Department of Homeland Security and Emergency Management (NMDHSEM), the Energy, Minerals, and Natural Resources Department (EMNRD), local and Tribal emergency managers, NWS, the New Mexico Healthcare Coalition, NMPRC staff, local media, and more. These exercises are mutually beneficial, strengthening PNM's internal PSPS procedures and decision-making while providing external partners with insight into PNM's processes and opportunities to offer feedback. The exercises also help PNM better understand external partner challenges, thereby improving coordination and shared preparedness. In addition, PNM participates in community wildfire preparedness town halls and engages with local governments on PSPS tabletop exercises they facilitate.

In 2025, the state legislature passed Senate Memorial 02 (SM 2), initiating a wildfire committee/group to establish/suggest policies and processes for wildfire mitigation activities across the state. The SM 2 working group met during the 2025 interim and concluded their meetings in October 2025. The Study Group brought together representatives from state agencies (including EMNRD and NMPRC), utilities (including PNM), cooperatives, insurers, Tribal leaders, state forestry, and other wildfire experts.

Key topics and recommendations for possible legislation and administrative action that would offer a roadmap to protect communities, infrastructure, and natural resources in the face of escalating wildfire threats included:

- Establishing an annual statewide Pre-Season Fire meeting and formalizing post-fire after-action reviews to improve coordination and information sharing can be accomplished without legislation or funding by adapting and enhancing existing statewide meetings and conferences.
- In the realm of data governance, categorizing data needs across fire phases, clarifying data ownership, access, and security protocols, and evaluating appropriate exceptions under the Inspection of Public Records Act (IPRA) to protect sensitive infrastructure information will require legislative action.
- While utility planning already considers wildfire risk mitigation, legislative and NMPRC action could improve that alignment by ensuring more timely cost recovery for utility investments designated in their WMPs filed at the NMPRC.
- The wildfire study group considered some of the legal, financial, and social aspects of wildfire-related liability, insurance availability in high-risk areas, and utility solvency following catastrophic wildfire events. Consensus was reached on the importance of evolving mitigation practices and addressing landowner requirements to provide access for mitigation treatments.
- The topics discussed without coming to an agreement were related to topics that would alter legal approaches on liability-related issues. They included whether New Mexico should retain its negligence-based liability standard; whether subrogation rights should be modified; whether compliance with WMPs should confer liability protections on utilities; and whether to propose—and how to structure—a state wildfire compensation fund.

Based on the work of the SM 2 Study Group, HB 267/SB 161 Wildfire Utility Mitigation and Liability Act was introduced in the 2026 30-Day Legislative Session. The legislation establishes a comprehensive wildfire-mitigation framework that incentivizes risk reduction while providing clearer liability standards for utilities. These risk reductions are based on compliance with approved wildfire mitigation plans at the NMPRC. The legislation passed its first House Committee (House Energy and Natural Resources) and did not move forward due to the time constraints inherent in a short 30-day session.

With ongoing conversations between SM2 Study Group members and bill sponsors, a more refined piece of legislation is expected to be introduced in 2027's 60-day legislative session.

### 3.2.7. Siting New Facilities and Following Wildfire Mitigation Guidelines for Distribution Designers Working in HFRA

New facilities include substations and communication relay facilities. When possible, certain facilities are sited outside of Tier 2 HFRA areas. When system needs require facilities to be within HFRA, care is taken to ensure that they are designed and constructed to PNM's current Wildfire Standards.

### 3.2.8. Guiding Business Decision-Making Processes

For example, PNM may choose to prioritize projects based on whether they are inside or outside an HFRA.

## 3.3. Maintaining PNM's HFRA Geographic Information Layer

The geographic information, known as geospatial layer data, associated with the HFRA, is maintained within PNM's GIS to ensure consistency in the HFRA boundaries used by a variety of supporting tools. PNM's Drafting and Geographic Information System (DGIS) Department is responsible for maintaining and updating the HFRA geospatial data layer. This layer is a core component of PNM's wildfire risk assessment framework and is used to support planning, mitigation, and operational decision-making. HFRA Tier boundaries may be adjusted from time to time to accomplish a variety of purposes, including but not limited to the following:

- To make system configuration(s) more appropriate to the landscape.
- For operational efficiencies not captured elsewhere.
- To limit the number of customers de-energized during PSPS based on assessments.

**Table 4** provides the data dictionary associated with the HFRA shapefile, outlining the schema, field definitions, and attribution standards applied to each mapped HFRA polygon. These attributes ensure consistency, traceability, and alignment with wildfire risk modeling outputs and regulatory reporting requirements.

**Table 4. HFRA GIS Shapefile Attributes and Descriptions**

Attribute	Description
<b>HFRA Name</b>	Each HFRA has a unique name. In most cases, the name corresponds to the general geographic area or a prominent landmark nearby.
<b>Utility Discipline</b>	Utility Discipline describes the general voltage class(es) found in the HFRA. The values available are Transmission, Distribution, or both T&D.
<b>County (Warning Area)</b>	County Warning Area (CWA) boundaries are used to delineate the area of responsibility for each Weather Forecast Office. From the NWS: “The group of counties for which an NWS Forecast Office is responsible for issuing warnings.”
<b>NWS Fire Zone</b>	From the NWS: This data set is used to delineate the FWZ that is used by NWS in the fire weather forecast program. These are areas of homogenous fire weather. FWW [Fire Weather Watch], RFW, and their attendant alerts are issued by NWS FWZ. Knowing which FWZ a particular HFRA coincides with is critical when making operational decisions.
<b>Acres</b>	GIS calculated acres for each HFRA polygon.

### 3.3.1. HFRA Refinement and Sub-Zoning

In 2025, PNM undertook a systematic effort to refine its HFRA by subdividing them into smaller, more discrete sub-zones. The purpose of this refinement is to enhance the level of operational granularity available to system operators during periods of elevated wildfire risk. By enabling targeted operational actions within sub-zones, PNM is better able to limit the geographic extent of PSPS events, thereby reducing customer impacts.

PNM’s DGIS Department manages the GIS HFRA layer. **Table 4** provides a data dictionary for the shapefile; each HFRA is attributed with the tabulated information.

## 3.4. Substation Assessment

Although substation equipment fires are uncommon, their potential consequences can be significant. Substations located within a designated HFRA or within ¼ mile of an HFRA boundary were prioritized for review. In October 2025, PNM conducted on-site assessments at all 39 substations within the above boundaries. The assessment helps to identify substations that may have presented the highest risk of an internal equipment fire spreading to nearby properties. Of the 39 substations, seven had additional vegetation management review, but none required further review and/or remediation. A preliminary visual screening using satellite imagery identified facilities situated in or adjacent to areas with wildland vegetation. Each substation was then visited and evaluated in the field, with observed risk factors—such as vegetation inside or surrounding the site—systematically documented. Vegetation near substations continues to be inspected on an annual basis.

## 4. Overview of Preventative Programs and Strategies

This section of the WMP provides an overview of the various strategies, resources, and the active, ongoing programs PNM leverages for wildfire mitigation.

### 4.1. Remotely Sensed Data Collection

#### 4.1.1. Light Detection and Ranging (LiDAR) and Imagery

PNM continues to use LiDAR data and imagery collected in 2021-2023 for:

- **VM analyses and reports.** See **Sections 4.2.1** through **Section 4.2.3**.
- **Assessment of facility conditions, inventory, and maintenance.** See **Section 4.3**.
- **Engineering.** See **Section 4.4.1**.
- **Asset retrofitting, refurbishment, and rebuilding.** See **Section 4.4.1**.

#### 4.1.2. Use of Satellite Imagery

In 2024, PNM began leveraging high-resolution satellite imagery to enhance the detection of vegetation encroachment and identify potential hazard trees adjacent to its rights-of-way (ROWS) near overhead power lines within designated HFRA. This technology offers a scalable and cost-effective alternative to traditional inspection methods, which are often limited by weather conditions and accessibility challenges.

Throughout 2025, data collected in 2024 has proven instrumental in identifying, assessing, and—when validated—mitigating hazard trees across several HFRA. Additionally, this data has supported the prioritization, scheduling, and execution of cyclical VM activities, beginning in PNM’s northernmost service areas. These assessments continued into 2025, with satellite imagery updated in Q4 of 2025.

Looking ahead, PNM plans to conduct annual satellite imagery collections to monitor vegetation changes within HFRA, verify that previously identified encroachments and issues have been addressed, and proactively detect and mitigate emerging risks.

#### 4.1.3. Unmanned Aerial Systems (UAS)

In 2025, PNM began exploring an in-house drone program with licensed pilots. Test flights were conducted in the East Mountains and Silver City. Plans are underway to scale this program for asset health inspections and post-weather-event patrols.

## 4.2. Vegetation Management (VM) in HFRA

### 4.2.1. VM Program Overview

PNM's VM program promotes the safe and reliable operation of its T&D facilities system-wide while also contributing to wildfire ignition risk reduction in PNM's HFRA. The program is designed to comply with the requirements of Section 218 of the National Electrical Safety Code (NESC) and, where applicable, the North American Electric Reliability Corporation's (NERC) Reliability Standard FAC-003-5. The program is overseen by an Associate Director of Vegetation Management & Wildfire Risk. Day-to-day operations are supervised by a VM Manager and a team of VM Specialists who oversee the work of contracted tree crews responsible for pruning and clearing vegetation near PNM's T&D facilities.

PNM strives to adhere to industry-standard utility VM practices and techniques as set forth in the American National Standard Institute's A-300 standard, including natural directional pruning to promote tree regrowth away from powerlines. PNM adheres to species-dependent clearance specifications that are common in the industry, including the target to prune trees for three years of clearance. Specific components and attributes of the VM program and HFRA-focused activities are described more fully below.

#### 4.2.1.1. Transmission

Facilities that fall under the scope of NERC Reliability Standard FAC-003-5 (i.e., those with lines rated greater than 200 kV) are patrolled annually, with no longer than 18 months between patrols. Contracted VM crews perform work along these facilities to maintain clearances and control incompatible vegetation (i.e., vegetation that at maximum mature height would encroach within minimum clearance distances of the conductor).

In 2018, PNM completed a five-year project to clear incompatible species along the entire legal width of the ROW of all required facilities. This project encompassed nearly 1,100 miles of transmission line.

Clearing of incompatible vegetation and pruning of vegetation along the ROW edge is managed by utilizing Integrated Vegetation Management (IVM) techniques. IVM is generally defined as the practice of promoting native, low-growing plant communities that are resistant to invasions of taller-growing, incompatible tree species using appropriate, environmentally sound, and cost-effective control methods. These methods can include a combination of chemical, biological, cultural, mechanical, and/or manual treatments.

The remainder of the transmission system (i.e., lines rated less than 200 kV) is patrolled every other year or on an as-needed basis, with a focus on areas known to have rapid vegetation growth due to the species present, site conditions, and proximity to water. VM work on these lines occurs as needed and as determined by patrol information, tree-related outages, remotely sensed data analysis, work requests, and/or field observations.

In addition, HFRA-related vegetation work is completed on capital projects to support optimized workflow, investment, and ongoing wildfire risk mitigation.

#### **4.2.1.2. Distribution**

At the beginning of each calendar year, VM activities within HFRA are scheduled based on inspection findings, historical vegetation-related outage records, and customer input. All circuit segments, including three-phase, single-phase, and open-wire secondary lines within HFRA are included in VM operations. Prior to initiating construction or rebuilding projects, dedicated patrols are conducted to identify required repairs and VM tasks.

#### **4.2.1.3. VM Metrics for T&D**

The VM Department currently tracks contractor performance metrics, including the miles of VM preventive maintenance and reactive maintenance work completed for both T&D assets. Costs per mile are tracked, and PNM captures data on its annual plan of completion and annual inspections for transmission VM, which is used to demonstrate compliance with NERC standard FAC-003-5. Other workload and work management information are collected and analyzed in a GIS-enabled software system.

#### **4.2.1.4. Enhanced Inspections/Clearing**

Enhanced vegetation inspections and clearing may occur within PNM's HFRA in accordance with results derived from remotely sensed data collection efforts. For example, AI analysis of satellite imagery is collected annually and used to classify vegetation distance from PNM facilities and to identify hazard trees.

#### **4.2.1.5. Requirements for Contracted Tree Crews**

PNM requires its VM contractors to have a well-developed wildfire prevention program that includes items such as annual training for all employees and stocking all trucks (to be staged at each job site) with the appropriate firefighting tools so they are ready to use at a moment's notice to suppress unwanted ignitions. PNM VM Specialists make regular field visits to monitor work by tree crews and to verify compliance with PNM's contractor wildfire mitigation requirements; pre-job safety briefings are routinely reviewed during site visits. PNM's RFW communication protocol includes VM contractors.

### **4.2.2. VM Plan Advancement for Wildfire Risk Mitigation**

As part of PNM's ongoing efforts to enhance its VM activities in support of the goals of the WMP, PNM has:

- Utilized data from multiple remotely sensed data projects (i.e., LiDAR, high-resolution imagery, and satellite imagery with AI-powered analysis) for nearly all of PNM's T&D lines within the HFRA and analyzed the data to assess the potential need for VM work.
- Developed a formal Utility Tree Risk Assessment (UTRA) process that proactively assesses tree risk and tree failure potential.

- Created SA capabilities for various activities that include matrices of increasing work restrictions tied to escalating fire weather conditions.
- Annually performed vegetation inspections in HFRAs for VM to mitigate wildfire ignition potential.
- Tracked VM metrics to drive and inform work needed.
- Increased data sharing across business units to improve efficiency and reduce risks through better collaboration.

#### 4.2.3. Tree Risk Assessment / Analysis App Description

To aid in the prevention of tree-related ignitions, PNM has engaged in the development of multiple applications, or “apps”, to be used by qualified personnel when assessing vegetation, both within and outside of PNM’s ROW. These applications allow for year-over-year data collection, enabling an assessment of any changes in tree health.

One app developed for use is primarily focused on performing UTRA. This app targets the assessment of any tree that is tall enough that if it failed or fell, it could strike utility electric supply lines. This type of tree is commonly known as a “strike/danger tree.”

Utilities typically follow a widely recognized best practice known as a Level 1 Limited Visual Assessment. This type of assessment is the most common and demonstrably effective level of tree risk assessment used in utility VM. This assessment is generally conducted on foot, by vehicle, or through an aerial patrol of large populations of trees adjacent to overhead electric lines. Documentation of this level of assessment is commonly captured at the circuit, feeder, or line segment level, not at the individual tree level. However, for various reasons, utilities may determine the need to increase the level of assessment, thereby lowering the acceptable risk threshold related to potential tree failure, and perform a Level 2 Basic Assessment. This application provides a platform for real-time, geotagged documentation of these Level 2 Assessments.

The application has been pre-populated with potential strike/danger trees identified during a LiDAR based remote sensing project executed in 2021-2023. The application also provides assessors with the ability to add in new trees discovered in or along the ROW during assessments.

Additionally, PNM has developed an application that is primarily used to assess the condition of fire-damaged trees. This application considers multiple factors, including pre-existing conditions, fire severity tree response, insect pestilence, and surrounding site conditions. These post-fire assessments are crucial, as fire-damaged trees may have an increased likelihood of failure due to pre-existing conditions and/or fire injury. These assessments are performed at the individual tree level, and real-time, geotagged assessments allow for large-scale work management and tracking. When used by qualified personnel, this can greatly reduce the risk of further ignition in areas affected by wildfire. This application has been pre-populated with previously identified potential strike trees within the fire boundaries of both the Trout and South Fork Fires.

### 4.3. Inspection, Inventorying, and Maintenance of Overhead Lines

PNM has implemented a multifaceted approach to the inspection and maintenance of overhead T&D facilities in the HFRAs, including the key activities described in the following sections.

#### 4.3.1. Virtual Inspections

Qualified contracted line personnel performed virtual visual inspections of PNM's overhead T&D structures within the HFRAs, for which high-resolution imagery captured during the remotely sensed data-collection effort described in **Section 4.1** was available. The virtual inspectors reported any deterioration or defects found, and each identified item was assigned an appropriate priority level.

##### 4.3.1.1. Asset Inventory

Concurrent with the above-mentioned virtual inspections described above, PNM also virtually inventoried the assets. This inventory data is proving to be a valuable resource for PNM's wildfire ignition mitigation efforts (e.g., responding to equipment failures, mitigation of wildlife-caused issues, retrofitting and/or replacing expulsive equipment, and more). This information enables PNM to carry out wildfire ignition risk mitigation activities that require identification of equipment types and pole and span configurations, etc. for work prioritization and execution.

#### 4.3.2. Wood Pole Test and Treat Program

PNM is utilizing a contractor to perform boots-on-the-ground inspections of all wood pole structures in its HFRAs. These inspections include visual assessments of the above-ground portions of the structures, partial excavation and inspection of the exterior of the poles near ground level, boring of the poles to assess their internal conditions, assessment of remaining strength based on inspection measurements, and the application of remedial preservative treatments to extend pole life.

#### 4.3.3. Aerial Patrols of NERC Transmission Lines

All transmission lines within the HFRAs that are under NERC jurisdiction are aerially patrolled annually to identify conditions warranting mitigation.

#### 4.3.4. Aerial and Ground Patrols of Non-NERC Transmission Lines

In late 2025 and Q1 of 2026, approximately 2,400 prioritized non-NERC transmission structures and associated lines in HFRAs were aerially or ground inspected. Of those inspections, a total of 13 high priority remediations were identified, 9 have been fully mitigated, 2 were reclassified to a lower priority after further inspection, and 2 are scheduled for repair in Q2 of 2026. Lower priority issues will continue to be monitored, and work scheduled, as needed.

### 4.3.5. Asset Inspections During VM Patrols

VM inspectors record asset damage and report it to the local business unit when damage is identified.

### 4.3.6. Corrective Maintenance

PNM's corrective maintenance is based on the findings of inspections of overhead line facilities in its HFRAs. The condition of transmission assets is evaluated during each inspection, and patrol documentation must include a priority rating. Priority ratings establish a risk level identifying potential impact to safety or reliability and assign an action for remediation or monitoring. The priority ratings align with an action time frame in which corrective actions should be performed. PNM uses a priority system to classify the severity of identified damage and establish required repair timelines within these priority ratings, described below:

- **Priority Conditions:** Repairs must be completed by the end of the following calendar year from the date the condition is reported, unless delays occur due to factors beyond PNM's control (e.g. material availability, inclement weather, environmental clearances, or permits required by external agencies).
- **Expedited High Priority:** If a condition poses an imminent risk of outage, immediate action is initiated via a phone call. The condition is still entered into the database as High Priority, but repairs are expedited and must be completed within 30 days.

### 4.3.7. Inspection / Maintenance Data Collection and Management System

PNM has developed an enhanced system for T&D inspection and maintenance, data collection, and management. This GIS-based platform enables the collection, viewing, and reporting of both virtual and boots-on-the-ground inspection data and incorporates attributes that will aid PNM's wildfire risk mitigation efforts. The data from the system also integrates with dashboards used for monitoring the status of various initiatives.

In addition to the above-mentioned inspection programs, PNM is assessing any ongoing need for diverse types of cyclic inspections of overhead T&D lines within the HFRAs and analyzing the associated budgetary requirements.

## 4.4. Overhead Power Delivery Infrastructure Advancements

PNM designs, constructs, and retrofits its facilities to meet customer and utility needs in a safe and reliable manner. This practice is in alignment with the requirements of the NESC's provisions for Grade B construction and other applicable standards. For existing and new facilities within its HFRAs, PNM has implemented and/or is in the process of implementing several enhancements that will aid its efforts to mitigate wildfire ignition risks associated with its overhead lines. Additionally, PNM actively monitors research and development (R&D) activities, innovative technologies, and relevant literature. PNM also participates in industry working groups and associations to keep abreast of emerging practices. Summaries of these efforts are provided in the following sections.

#### 4.4.1. Line Design, Construction, Retrofitting, and Operating Enhancements for HFRAs

Summaries of the line design, construction, retrofitting, and operating enhancements PNM completed, are in process of implementation, and/or investigating, are provided below.

##### 4.4.1.1. Communications Infrastructure and Electrical Devices

###### 4.4.1.1.1. Communications Infrastructure

PNM is upgrading, expanding, and hardening communications infrastructure in its HFRAs. This infrastructure will give PNM the ability to replace manually operated equipment with Supervisory Control and Data Acquisition (SCADA)-connected and remotely operable equipment, utilize more advanced and sensitive devices, and integrate sensors for monitoring line and/or environmental conditions thereby improving SA, etc.

###### 4.4.1.1.2. Capacitor Banks

New capacitor bank installations and replacements are being equipped with SCADA communications to enable the sending of real-time data to PNM's Distribution Operations Center (DOC). A feature included in these banks is neutral current sensing, which can detect imbalances that may result from a blown fuse, a bad capacitor can, or a stuck switch. These problems can create fire hazards if left untreated; a neutral sensor can indicate a problem where the capacitor bank needs to be inspected. Without this sensing capability, these types of issues generally remain undetected until the capacitor is inspected for another reason. Wiring for the neutral and ground connections of the capacitor bank as well as its connection to the system neutral and pole ground was also adjusted to help prevent high voltage in the event of specific wire failures.

###### 4.4.1.1.3. Reclosers, Relays, and Fault Locating Sensors

PNM is in the process of integrating a variety of advanced SCADA-connected reclosers, relays, and fault sensor technologies for implementation in HFRAs, both for new construction and as replacements for existing equipment that is not remotely operable/adjustable (e.g., older reclosers). These technologies promise to deliver greater operational flexibility and SA. PNM's grid modernization program will assist in installing these devices and is incorporating wildfire considerations in its implementation.

In 2025 and Q1 2026, PNM replaced relays on 18 feeders in HFRAs. In the remainder of 2026, PNM plans to replace relays on 17 additional feeders in HFRAs.

###### 4.4.1.1.4. Switches

PNM's current standards for new switches include SCADA-capable switches that are appropriate for use in their HFRAs. PNM is evaluating replacing older switches with the new SCADA-capable switches in the HFRAs. PNM is also increasing its use of SCADA-connected switches and reclosers, which will assist with troubleshooting, provide more flexibility for sectionalizing, etc. PNM installed 53 isolating switch devices from 2025 to current.

#### 4.4.1.1.5. Fuses and Lightning Arresters

PNM has approved the use of non-expulsive fuses and wildfire-safe lightning arresters in HFRA that help reduce expelled, molten metal that may cause an ignition. Any new installations are being installed with wildfire-safe lightning arresters and non-expulsive fuses. The company installed 225 non-expulsion fuses and arresters in Santa Fe, Clayton, Sandia, Las Vegas, Ruidoso, and Silver City HFRA.

#### 4.4.1.1.6. Enhanced Protection Schemes and Protection Coordination

PNM has modified the settings and capabilities of devices in HFRA during extreme fire danger.

PNM's WSM strengthens wildfire mitigation in high fire risk areas by using advanced relay settings, high-impedance fault detection, modern reclosers, and targeted equipment upgrades to support ignition risk reduction and faster fault clearing. While these enhanced protections improve safety, they can also lead to customer outages during elevated weather events due to more sensitive, and wide-reaching trip settings.

The reclosing protocol calls for the disabling of automatic reclosing on selected lines during high wildfire risk conditions—triggered by factors like RFWs, extreme risk forecasts, or PSPS events—so that circuits remain de-energized until inspected, with SCADA devices updated remotely, and non-SCADA devices manually set to non-reclose. See **Section 4.4.3** for more information.

#### 4.4.1.1.7. Transformers with Internal Fault Detectors (IFD)

PNM has developed an approved specification for transformers with Internal Fault Detectors (IFD). IFDs help to quickly identify problems with transformers and thereby lessen the chances of closing in on a faulted transformer and potentially causing an arc, fire, or other issue. New transformer designs include IFDs, and existing transformer designs are expected to be updated to include IFDs, Department of Energy (DOE) efficiencies, and UL94 listed V0 bird guarding before the implementation date of DOE's new efficiency standards (which is currently set at 2029). PNM is working with manufacturers on scheduling and updating the designs.

#### 4.4.1.1.8. Fault Protection for Transformers

PNM is implementing the use of completely self-protected transformers (CSPs) for single-phase applications in certain portions of its HFRA. CSPs eliminate the use of cutout fuses, which, in turn, reduce the likelihood of spark generation during operations. When conventional transformers are installed, as noted above, they are paired with non-expulsive fuses.

#### 4.4.1.1.9. Covering for Wire Jumpers

As uncovered equipment jumpers are replaced, covered wire is used. New equipment jumpers are installed using covered wire, per PNM's construction standards. Covered wire significantly reduces the likelihood of arcing caused by animals, vegetation, and other contact.

#### 4.4.1.2. Wildlife Protection

Industry data shows that wildlife contacts with energized power delivery facilities are potential sources of ignitions. PNM's Avian Protection Plan (APP) addresses all 10 of the Avian Power Line Interaction Committee and U.S. Fish and Wildlife Service (APLIC and USFWS 2005) recommended APP components. PNM regularly updates its APP and actively implements its provisions. The APP includes elements that reduce existing and future electrocution and ignition risks through mitigation and wildlife-friendly construction practices. These strategies revolve around the principle of providing adequate spacing and/or insulation for energized and grounded components.

PNM has avian-friendly construction design standards to mitigate the risk of future wildlife electrocution. These standards provide wildlife-friendly clearances that protect wildlife that might encounter energized conductors on a pole. Power equipment on avian-friendly poles is installed with wildlife protection. PNM's preventive wildlife protection program applies to new construction in habitat areas.

In addition, PNM actively mitigates wildlife electrocution risk on existing infrastructure by installing protective insulation on high-risk poles. Products used to mitigate ("retrofit") in-service facilities include conductor covers, insulated jumper wires, arrester caps, cutout covers, bushing covers, etc. These products are typically made of a polymer, and any available UL 94 V-0 (flame- and drip-retardant) products have been approved and replaced any previous products. Mitigation products protect not only birds, but also climbing mammals and reptiles (e.g., squirrels, raccoons, snakes) that are susceptible to electrocution. PNM prefers to retrofit susceptible equipment when other work is being performed on a line or structure, as this practice increases the scale of mitigation that can be funded by available budgets.

When wildlife electrocution risk is mitigated, wildlife-caused ignition risk is concurrently reduced. Although much of PNM's retrofitting is opportunistic (i.e., completed along with other maintenance activities), PNM actively mitigates areas where wildlife electrocutions have negatively impacted reliability.

#### 4.4.1.3. Poles, Conductors, Crossarms, Construction, and Hardware

##### 4.4.1.3.1. Poles

PNM has approved distribution design standards that specify taller poles, higher-class poles with larger diameters for three-phase configurations, and taller poles for single-phase framing within the HFRA to lower the risk of wire contacts with vegetation. Poles with larger diameters are intended to increase resiliency and offset potential loss of strength due to charring caused by passing wildfires. PNM has evaluated pole materials and has concluded that wood is preferred for distribution, while steel is preferred for transmission. Wood provides more insulation for bird, animal, and vegetation contact (potential ignition sources) which is more probable on distribution due to the shorter distances between wires and lower heights. PNM distribution also acknowledges the need to use steel or ductile iron poles when strength requirements can't be met by standard wood poles and is looking into trialing some fiberglass poles.

In addition, PNM is developing criteria based on considerations of asset criticality and landscape risk factors for identifying existing poles in its HFRA that are candidates for application of fire-retardant treatments.

##### 4.4.1.3.2. Covered Primary Wire/Tree Wire

There are advantages and disadvantages to using covered wire/tree wire. The insulation provided by the wire helps prevent possible contact with debris and vegetation, but it adds cost, weight, and sag, which requires installation of more poles to support the covered wire. Also, covered wire may not trip a conventional protection device if a conductor is on the ground.

PNM completed two of three covered wire pilot installations and will analyze the pilot results for potential expansion of the pilot. Due to environmental concerns, two sections of overhead line were unable to have vegetation trimmed. PNM reconducted these specific segments to covered primary to reduce tree-to-conductor contact. This pilot also has a larger section of line, designed to discover if the covered conductor is scalable, with measurable benefit. The two primary covered wire trials totaled approximately 8,300 feet.

##### 4.4.1.3.3. Open Wire Secondary

As part of PNM's Wildfire Mitigation Guidelines Standards, where possible, open wire secondary is to be changed out and replaced with multiplex cable (covered wire) or removed altogether, with the installation of more transformers. Multiplex cable is a PNM-preferred standard due to the proximity of secondary wires compared to primary wires. PNM has removed 6,238 feet of open wire since 2025.

#### 4.4.1.3.4. Crossarms

PNM standards have shifted to using fiberglass crossarms for all new installations and replacements. This shift will help to eliminate the risks of leakage current igniting crossarm fires. Further, fiberglass crossarms are not subject to decay, which can contribute to deterioration of the upper surfaces of wood crossarms that cannot be detected from ground-based inspections. PNM has also updated their wildfire design guidelines to specify the use of 10' crossarms and raptor-safe framing as allowed by existing ROW width.

#### 4.4.1.3.5. Primary Connectors

PNM's current standards for connectors are appropriate for HFRA's. However, some substandard connectors that can cause arcing/sparking if they loosen or degrade are still in service. When legacy substandard connectors are identified through inspections, they are replaced.

#### 4.4.1.3.6. Guy Strain Insulators

PNM has increased the length of newly installed guy strain insulators from 36" to 78" to ensure that any primary guy wire is insulated to the point where it does not become energized by contact with a primary conductor. Existing facilities with legacy construction are mitigated opportunistically during other planned maintenance activities.

#### 4.4.1.3.7. Equipment Locations

Where possible, major equipment (such as capacitors, reclosers, and voltage regulators) should be located either on a pole with no vegetation at its base or in another location where ignition and subsequent spread is unlikely.

### 4.4.2. Industry R&D, Emerging Practices, and Continuous Improvement

As part of its commitment to continuous improvement, PNM monitors industry research and related literature, as well as information on emerging materials and tech solutions. For example, PNM attends virtual and in-person seminars and webinars hosted by DistribuTech (DTECH<sup>10</sup>), the Western Electricity Coordinating Council (WECC<sup>11</sup>), the Edison Electric Institute (EEI<sup>12</sup>), and the Electric Power Research Institute (EPRI<sup>13</sup>). These industry-specific organizations are composed of technical working groups and impart some of the latest information, testing programs, and lessons learned to their participants. PNM also references the Cal Fire Powerline Fire Prevention Field Guide for guidance on fire practices.<sup>14</sup>

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<sup>10</sup> <https://www.distributech.com/>

<sup>11</sup> <https://www.wecc.org/>

<sup>12</sup> <https://www.eei.org/>

<sup>13</sup> <https://www.epri.com/>

<sup>14</sup> <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/prevention-field-guides>

## 5. Escalating Fire Weather and Operational Strategies

### 5.1. Operational Awareness

#### 5.1.1. Indji Watch

PNM subscribes to Indji Watch, a natural hazard alerting company. Indji Watch divides each PNM T&D assets each into its own “project.” As described below, Indji Watch provides PNM with SA and alerts when weather and wildfires may impact PNM assets or operations. It also includes additional information as described below.

- **Fire Operating Condition Forecast.** A rolling 6-day forecast as described below in **Section 5.2**.
- **Wildfire Alerting.** Anytime Indji Watch discovers a new fire within five miles of PNM assets; an alert is sent to PNM. The new fire location is displayed in the Indji Watch Threat Window and is available for viewing by all credentialed PNM personnel.
- **RFW.** Indji Watch pushes RFW alerts as both emails and text messages to PNM personnel according to their preferences in the Indji Watch Administrative Window. These email alerts are the basis for PNM’s RFW alerting process described in **Section 5.4.2**.
- **Lightning Detection.** Indji Watch displays recent lightning strikes in its Threat Window.
- **Wind Alerts.** When wind speeds are expected to exceed PNM-defined thresholds, alerts are texted or emailed to PNM personnel according to their administrative preferences.
- **Real-Time Radar.** PNM can track the path and intensity of storms across its landscape.
- **Forecast Radar.** PNM can track up to eight hours of forecast radar storm intensity and movement.
- **Earthquakes.** Information is displayed in the Threat Window. Specific information on each event is available via pop-up displays.
- **Extreme Weather Alerts from the NWS.** The Indji Watch Threat Window constantly displays NWS alerts and warnings for High Wind, Extreme Heat, FWW, Ice Accumulations, etc. These same alerts are pushed to users via text or email according to their administrative preferences.
- **Forecast Dashboards.** Indji Watch provides up to 14 days of forecasts, updated hourly, for 49 selected PNM locations.
- **PNM’s Weather Station Visibility.** PNM can see the latest observations from its active mesonet.

## 5.2. Daily Situational Awareness (SA)

In the summer of 2025, PNM enhanced its situational awareness capabilities by implementing a 6-day fire danger forecasting system. This tool delivers a running 6-day forecast which is updated daily and provides a real-time dashboard view of the Fire Operating Condition Forecast (FOCF) for each HFRA. In addition to the forecast, the system maintains continuous monitoring for critical fire weather thresholds and automatically issues alerts when conditions such as RFWs or other predefined triggers are met. These capabilities are fully integrated into PNM’s wildfire mitigation workflows, ensuring that operational planning, field deployments, and public safety measures can be initiated quickly and based on the most current risk information available.

**Figure 4. Sample Daily SA Report**

Operating Condition Areas	Wednesday Aug 27	Thursday Aug 28	Friday Aug 29	Saturday Aug 30	Sunday Aug 31
Bosque	Extreme	Extreme	Extreme	Extreme	Extreme
Clayton East	Normal	Normal	Normal	Normal	Normal
Clayton West	Normal	Normal	Normal	Normal	Normal
Fort Sumner 3	Elevated	Elevated	Normal	Normal	Normal
Las Vegas	Normal	Normal	Normal	Normal	Normal
Mt. Taylor	Extreme	Extreme	Extreme	Extreme	Extreme
Ruidoso	Normal	Normal	Normal	Normal	Normal
Sandia Mts	Normal	Elevated	Normal	Normal	Normal
Santa Fe	Normal	Normal	Normal	Normal	Normal
Santa Fe East	Normal	Normal	Normal	Normal	Normal
Santa Fe North	Normal	Normal	Normal	Normal	Normal
Silver City	Normal	Elevated	Normal	Normal	Normal

### 5.3. Fire Operating Conditions

Fire Operating Conditions (FOC) inform mitigation efforts for at-risk activities, such as cutting, grinding, welding, and other similar field activities as well as informing some system operations. As burning conditions become more critical, mitigations are increased (see **Table 6**). These operating conditions include both single-person/single-vehicle and multiple-person/multiple-vehicle project work.

PNM at-risk activities within an HFRA or other area covered with flammable vegetation will comply with **Table 6's** operating conditions and mitigations required for each. These FOC conditions are derived from the National Fire Danger Rating System (NFDRS) Burning Index and assigned to each HFRA.

**Table 5. Job Site Operating Conditions Considerations**

Job Site Considerations
Does the mitigation level match the operating condition from Daily SA Report?
Has an RFW been issued by the NWS for the work area? <i>(Check QR code on next page.)</i>
Have at-risk activities that could cause an ignition been identified?
Have wind conditions at the work site been considered?
Is the work in, or adjacent to, ignitable wildland fuels?
Have emergency assignments in case of ignition been documented?
Has someone been designated to call 911 in case of an emergency?

**Table 6. Mitigations for Operating Conditions in Fire-Prone Areas\***

NORMAL Operating Conditions	
<b>Description:</b>	Normal precautions and mitigations should be adequate to prevent most ignitions from mild heat sources. Common fire suppression tools such as back-pumps/fire extinguishers and shovels should be adequate to suppress witnessed ignitions unless wind and topography combine to drive rapid fire growth. Consider crew safety during any fire suppression activities.
<b>Mitigations:</b>	<p>Documented Safety Tailboard.</p> <p><u>Tools per WMP:</u></p> <ul style="list-style-type: none"> <li>➤ Passenger Vehicles, Pick-up trucks and ATVs <ul style="list-style-type: none"> <li>• One round point shovel - overall length of at least 46"</li> <li>• One serviceable fire extinguisher, minimum U.L. rated "2 BC"</li> </ul> </li> <li>➤ Large Trucks (with one or more passengers) <ul style="list-style-type: none"> <li>• Two round point shovels - overall length of at least 46" or one round point shovel and one Pulaski</li> <li>• One 5-gallon backpack pump and/or a "2 BC" rated fire extinguisher</li> </ul> </li> </ul> <p>Documented person to call 911 and provide location and access route for emergency crews.</p> <p>Take adequate precautions such as wetting the area to prevent ignitions when working in or adjacent to dry fuels.</p> <p>Use caution when driving across, parking on or when cutting, grinding, or welding on or near dried grass/vegetation.</p> <p>Strict adherence to PNM Smoking Policy.</p>
ELEVATED Operating Conditions	
<b>Description:</b>	Enhanced mitigations like assigning a Fire Watch, wetting the work area with water or retardant, covering the work area with a welding blanket, and a water trailer with pump onsite are advised to prevent ignitions. Fires that start under Elevated Conditions may be difficult to contain even when immediately discovered. Extra caution should be taken to ensure the safety of crews attempting extinguishment.
<b>Mitigations:</b>	<p>All NORMAL Mitigations, plus:</p> <p>Work will stop and a new Safety Tailboard will be completed any time the fire risk increases, i.e., work location or work activity changes, RFW is issued, significant increase in wind at the work site, etc.</p> <p>When crew consists of multiple people, documented working Fire Watch person(s) as appropriate and a designated person to call 911 to provide location and access route for emergency crews.</p>

<b>EXTREME Operating Conditions</b>	
<b>Description:</b>	Fires start easily from all causes, spread rapidly, and pose significant difficulty of control. Long-range spotting may occur. Fires will be dangerous to attack and will likely escape control except when discovered immediately upon ignition- extreme caution is indicated. Note: Red Flag Warnings supersede all other operating conditions.
<b>Mitigations:</b>	<p>All ELEVATED Mitigations, plus:</p> <p>At a minimum, one fire suppression hand-tool per crew member at job site.</p> <p>At a minimum, two PNM approved fire extinguishers and/or two filled five-gallon back-pumps at the job site or readily accessible on work that is mobile (i.e., access road maintenance or water source such as water buffalo as required by the land manager)</p> <p>Check all work sites for hot spots or smoldering embers for 30 minutes (or duration as required by land manager) after at-risk activities have ceased.</p>
<b>RED FLAG or Special Circumstances Operating Conditions</b>	
<b>Description:</b>	When fire danger and activities combine to create extraordinary risk, enhanced mitigations may be required. This operating condition requires mitigations tailored specifically to the work at hand.
<b>Mitigations:</b>	<p>Mitigations will be determined case by case.</p> <p>Essential work that requires documentation of Supervisors' approval and mitigation determination.</p> <p>Typically, this work would be postponed to days with less critical fire risk.</p>

*\*Disclaimer: This Daily SA tool provides a relative indication of fire danger for a given area and date. It is prepared with all due diligence but cannot guarantee that strict adherence to company practices or sound fire prevention measures will prevent ignition and consequential wildfire damage. User assumes all risk for its use.*

## 5.4. Wildfire Conditions and Red Flag Warnings at PNM

### 5.4.1. Wildfire Conditions

Wildland fire agencies (USFS, BLM, etc.) use the notion of fire season to determine staffing and operational levels.<sup>15</sup> In general, wildfire conditions begin in the spring when the landscape becomes receptive to ignition. As fire conditions escalate through the summer, burning conditions become more critical. Generally, late rains close out peak wildfire conditions once annual grasses “green-up” in response to adequate rainfall. While wildfires can and have occurred during any time of the year, for PNM’s operational purposes, heightened readiness for wildfire conditions and activities run from March through October.

Year to year, beginning and ending dates may be adjusted depending on weather conditions and rainfall patterns.

### 5.4.2. Red Flag Warning (RFW)

An RFW is issued by the NWS when wildland fuel and weather combine to produce critical burning conditions. RFWs are issued for FWZs for a given time. RFWs provide PNM with critical SA that is useful for operational decision-making. Typically, only essential field work will continue during an RFW. Some system settings are adjusted during an RFW; these procedures are documented by PNM’s T&D Departments.

Criteria for RFW issuance is left to the discretion of each NWS Forecasting Office. However, in general, when the following conditions are expected, an RFW is issued by NWS:

- Wind speeds above 25 mph.
- Relative humidity below 15%.
- 10-hour fuel moistures at or below 8%.

PNM serves areas covered by two NWS Forecasting Offices (see **Figure 6**):

- An office in Albuquerque.
- An office in El Paso, Texas.

The southeastern corner of New Mexico is covered by Midland; however, there is no PNM service area in the Midland Forecasting Office area of influence.

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<sup>15</sup> [https://www.fs.usda.gov/nwacfire/home/terminology.html#F:~:text=of%20a%20fire-,Fire%20Season%3A,-1\)%20Period\(s](https://www.fs.usda.gov/nwacfire/home/terminology.html#F:~:text=of%20a%20fire-,Fire%20Season%3A,-1)%20Period(s)

As previously mentioned, RFWs affect both system settings and field operations. To ensure that all affected PNM personnel are aware that an RFW has been issued, an email alerting process has been created that uses the RFW alerts from Indji Watch and functionality from Microsoft to “push” RFW alerts to customized distribution lists. In this way, receipt by affected personnel is ensured. An example of the alert is shown in **Figure 5** below.

### Figure 5. Sample RFW

#### US NWS Red Flag Warning

Indji has detected a **Red Flag Warning** affecting Las Vegas, Clayton, Santa Fe.

**Summary:** Red Flag Warning issued March 8 at 11:42AM MDT until March 9 at 7:00PM MDT by NWS Albuquerque NM

**Description:** ...RED FLAG WARNING IN EFFECT FROM NOON TO 8 PM TODAY FOR MUCH OF NORTHEAST AND EAST CENTRAL NEW MEXICO DUE TO STRONG WIND AND LOW HUMIDITY... ..RED FLAG WARNING IN EFFECT FROM 11 AM TO 7 PM MONDAY FOR MUCH OF NORTHEAST AND EAST CENTRAL NEW MEXICO DUE TO STRONG WIND AND LOW HUMIDITY... ..Critical fire weather will continue today and Monday east of the central mountain chain due to persistent surface low pressure, ample atmospheric mixing, strong southwesterly winds, and well above normal high temperatures. The greatest confidence for critical wind speeds will develop in the area from U.S. Highway 60 north to the Interstate 40 corridor and U.S. Highway 412. The National Weather Service in Albuquerque has issued a Red Flag Warning...which is in effect from 11 AM to 7 PM MDT Monday. The Fire Weather Watch is no longer in effect. \* AREA AND TIMING...The Northeast Plains (Zone 104), Northeast Highlands (Zone 123), Central Highlands (Zone 125), and East Central Plains (Zone 126) from noon through 8 PM MDT today then again from 11 AM through 7 PM MDT Monday. \* 20 FOOT WINDS...Southwest 25 to 35 mph with gusts up to 45 mph today. Southwest or west 20 to 30 mph with gusts up to 40 mph on Monday. \* RELATIVE HUMIDITY...Minimum values between 5 to 11 percent both days. \* IMPACTS...Any fires that develop will likely spread rapidly. Outdoor burning is not recommended.

**Sent:** Sun Mar-08 11:42 AM

Go to <https://www.indji.net/watch> to view further details in the Indji Watch client.



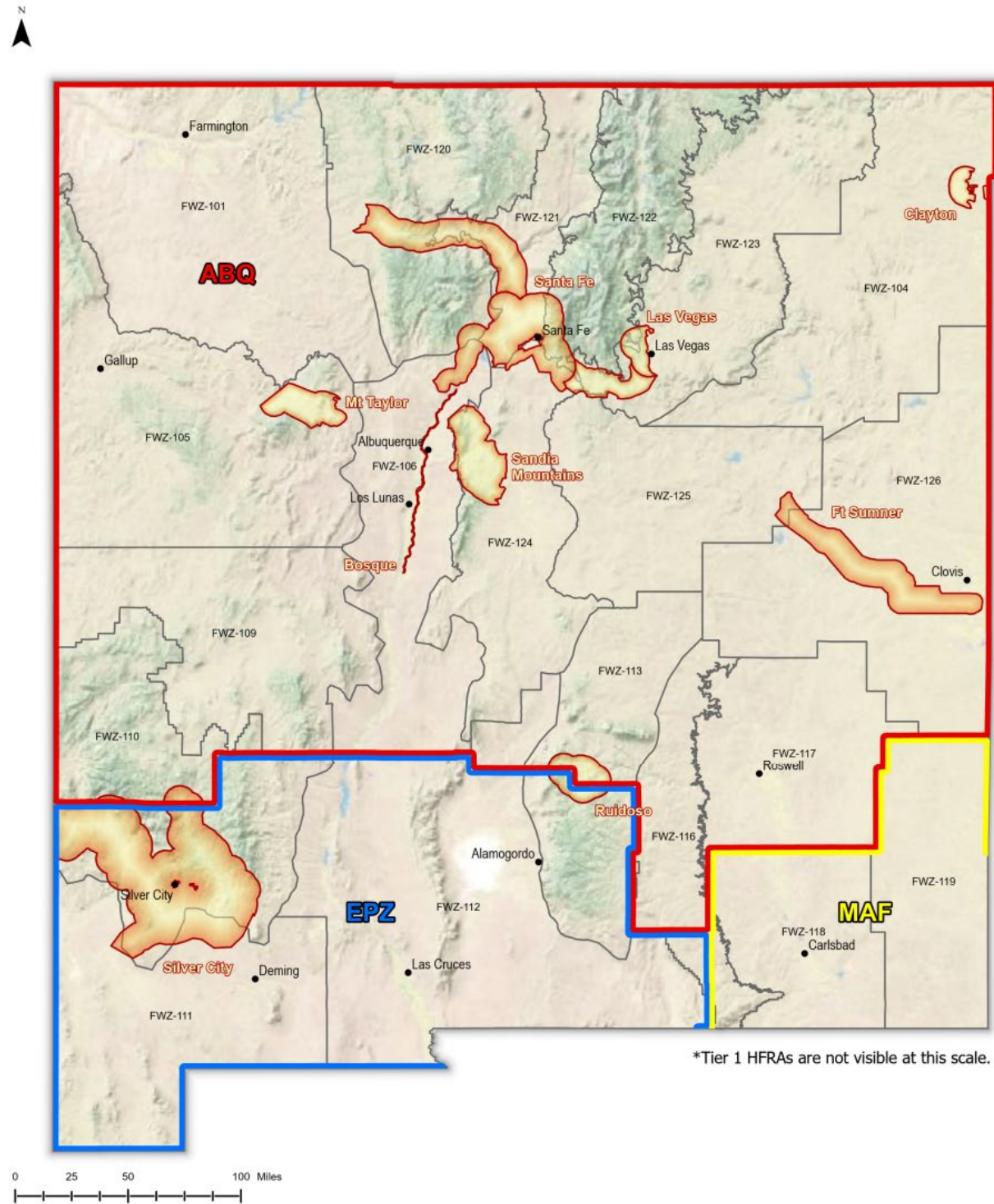
Copyright ? 2026 Indji Systems, All rights reserved.  
You are receiving this email because you are subscribed to email alerts for the Indji Watch business rule 'PNMTransmissionUSNWSWeatherWarningInServiceTerritoryZone'.  
Please notify your corporate Indji Watch contact if you would like to unsubscribe from these alerts.

The following table (**Table 7**) gives guidance on how RFWs affect PNM operations.

**Table 7. RFW Impact on System Operations**


System Operation	Description
Transmission Reclosing	Transmission reclosing is disabled in HFRAs when the NWS issues an RFW for any FWZ within HFRAs.
Distribution Reclosing	Distribution reclosing is disabled in HFRAs when the NWS issues an RFW for any FWZ within HFRAs.
Field Operations	Are governed by the Mitigations for Operating Conditions in Fire-Prone Areas, as shown in <b>Table 5</b> .

Figure 6. NWS Forecasting Offices Map



**PNM HFRAs with NWS Fire Weather Zones (FWZs) and Forecasting Offices 2025**

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### 5.4.3. Wildfire Safety Mode (WSM)

PNM is accelerating its wildfire mitigation efforts through the implementation of WSM across its electrical distribution and transmission infrastructure. This strategy is central to reducing wildfire risk in HFRAs by harnessing state-of-the-art technologies and advanced protection measures. WSM can be enabled during elevated weather events.

At the core of this initiative, PNM is enhancing protection schemes on distribution feeder relays and reclosers. PNM has enabled a group setting on capable relays and reclosers to put them into WSM. Additionally, PNM is enabling high-impedance fault detection and tripping on compatible relays and reclosers to enhance fault detection from downed wires or vegetation contact. This means faults are disconnected more quickly, reducing the chance that energized equipment sparks a fire. PNM's current standard is to install relays and controllers compatible with these settings.

However, there are reclosers and relays from previous standards in the system that may not have the full functionality of the current standard. Where possible, PNM is implementing aspects of WSM on these older devices. As of Q1 2026, PNM implemented these settings on 10 existing devices.

For operational and cost efficiency, PNM plans to continue implementing these settings on a rolling basis as other work, such as relay replacements, recloser changeouts, are happening. PNM transmission lines are often protected with communication-aided schemes like Line Current Differential (LCD) or Permissive Overreaching Transfer Trip (POTT). These schemes are high-speed and provide no intentional time delay clearing over 100% of the line. These schemes are enabled year-round.

Additionally, PNM is conducting targeted replacement of relays across all voltage levels to support system flexibility and responsiveness. New relays are capable of quickly detecting and reacting to changing grid conditions, ensuring faults are cleared quickly to minimize the chance of equipment-related ignitions.

The company is also moving away from legacy hydraulic reclosers, opting instead for microprocessor-controlled models. While hydraulic reclosers have served reliably for basic operations, they lack the real-time data and remote-control features essential for today's wildfire safety requirements. The advanced reclosers allow for dynamic protection settings, rapid fault response, and seamless coordination with grid devices, all of which jointly work to cut down the risk of wildfire ignition and support better reliability.

PNM's grid modernization efforts are ongoing throughout 2026 and, barring circumstances outside of PNM's control, can result in 26 feeders with aspects of WSM setting options, enabled. Focus areas for this work includes Ruidoso, Santa Fe, and Silver City. Line sensors and fault indicators will also be installed to create additional visibility in these sensitive locations.

PNM launched a pilot project focusing on falling conductor protection across distribution circuits. Advanced controls are used to detect the unique electrical signatures of a conductor detaching from its support. When this occurs, the system can instantly de-energize the affected line section, dramatically lowering the risk of ignitions from downed conductors. This pilot started in August 2025 and is anticipated to be completed in 2027. After deployment and a period of evaluation of the pilot, PNM will determine if this technology is something to implement on a wider scale.

An important operational outcome of deploying WSM is the reconfiguration of protective device settings, especially at three-phase protective devices. These devices are now set to trip more quickly when faults are detected, which promptly de-energizes lines during hazardous situations and reduces the time equipment remains energized during faults—a critical aspect for wildfire prevention in HFRA.

However, this increased sensitivity has a trade-off: Because the protection zones at three-phase devices cover larger portions of the grid, faster tripping can lead to wider-reaching outages that affect more customers. In essence, a single fault during WSM operation may result in a larger segment of the electrical system being shut off as a precaution, creating more extensive interruptions. This effort to reduce the likelihood of ignition from PNM-owned equipment can come at the risk of reduced reliability for some customers.

#### 5.4.4. Reclosing Protocol

This protocol requires automatic reclosing to be blocked on selected overhead distribution and transmission lines during high wildfire-risk conditions. This helps ensure that line circuits only ‘trip’ once and stay de-energized until crews inspect the line and operators approve its manual re-energization.

Non-reclosing triggers include:

- NWS RFWs that intersect with electric lines in HFRA.
- Extreme Risk identified in the FOCF sent to operations.
- During PSPS events, where power is intentionally shut off to prevent wildfire ignition, reclosing is disabled on surrounding in-service lines.

The above is typically followed for PNM’s SCADA-enabled devices. Non-SCADA devices require PNM personnel to physically go to the device to disable reclosing. Therefore, they are usually in a non-reclose state for a longer period. These may be set to non-reclose on a seasonal basis.

## 6. Power Safety Power Shutoff (PSPS) Overview

PNM has developed a PSPS Plan—filed separately with the NMPRC as a proactive measure of last resort to reduce the risk of utility-related wildfire ignitions.

The PSPS Plan emphasizes year-round monitoring for wildfire potential, with heightened readiness from March through October. PNM subscribes to outside services-contractors for situational awareness and specific threshold criteria based on a six-day forecast to support decision-making. The PSPS Plan also outlines relevant considerations, decision-making processes, communication protocols, and implementation requirements to be applied before, during, and after a PSPS event.

The key objectives of the PSPS Plan include:

- **Safety:** Ensure the safety of the public and our employees, contractors, and Mutual Assistance employees.
- **Restoration Time:** Minimize the duration of an outage, with safety as the primary focus.
- **Mitigate Consequences:** Provide our customers with support to mitigate the impact of an outage.
- **Information:** Provide accurate, timely, meaningful information to our customers, our employees, and other stakeholders.
- **Resources:** Effectively manage human, equipment, material, and information resources to minimize restoration time and maximize productivity and performance.

The PSPS Plan is reviewed annually and updated, as needed, by March. Updates to the PSPS Plan incorporate industry approaches, community, and stakeholder feedback. This includes, but is not limited to, insights from: local, state, federal, Tribal, and Pueblo partners in HFRA to balance public safety with operational and community impacts. More details can be found in the PSPS Plan filed separately with the NMPRC.

## 7. Annual Fire Prevention and Fire Safety Training

PNM has established a comprehensive training program focused on fire prevention, fire safety, and the company's Wildfire Mitigation Program, with particular emphasis on HFRAs. Training modules cover how HFRAs are developed, their role in system operations, and how they guide ignition mitigation strategies. Personnel also receive instruction on recognizing and reacting to fire weather conditions, including RFWs, as well as basic fire behavior and safety practices when working in wildfire-prone areas.

PNM contractors are required to provide their own fire safety and prevention training to their employees.

### 7.1. Annual Training

PNM delivers an annual Fire Prevention and Fire Safety training course that emphasizes both operational awareness and personal safety. The training covers the key areas described in the following sections.

#### 7.1.1. Use of the Fire Operating Condition Forecast

Employees are trained to interpret and apply the FOCF, which provides situational awareness of fire danger levels and guides operational decisions to reduce ignition risk.

#### 7.1.2. Protocols During RFWs

Personnel learn the specific steps to follow during an RFW, including operational restrictions, additional mitigation measures, and communication procedures to minimize wildfire ignition potential.

#### 7.1.3. Ignition Prevention Measures

This highlights proactive practices that reduce the likelihood of equipment-related ignitions, such as proper tool use, mitigation routines, and adherence to vegetation clearance standards.

#### 7.1.4. Tailboard Safety Plans

Training reinforces the importance of Tailboard Safety Plans as a tool to brief crews before field work, ensuring that fire hazards and mitigations are clearly identified and addressed.

#### 7.1.5. Fundamentals of Fire Physics and Behavior

Basic instruction on how fire spreads, the influence of weather and topography, and fuel conditions provides employees with the knowledge to anticipate and respond to changing fire environments while remaining safe.

#### 7.1.6. Fire Tool Requirements and Safe Usage

Employees review the fire tools that must be carried during periods of elevated fire danger along with their proper use.

### **7.1.7. Personnel Safety Protocols for Working In or Near Fire Areas**

The course reinforces situational awareness, escape route identification, and personal protective equipment (PPE) requirements to safeguard personnel in wildfire conditions.

### **7.1.8. Basic Principles of the Incident Command System (ICS)**

Personnel are introduced to ICS concepts to improve coordination with first responders, enabling more effective communication and support during wildfire events.

## **7.2. Encroachment**

In 2024, PNM developed and adopted an encroachment plan. Encroachment plans involve the preemptive de-energization of electric utility infrastructure when a wildfire of consequence has the potential to reach those assets. This practice reduces the risk of assets contributing to an ongoing wildfire due to arcing or sparking from asset failure due to excessive heat, fire, or a combination of the two. As part of the encroachment plan, PNM utilizes a matrix that helps operations staff determine if a fire is of consequence, and what to do if it approaches company assets. To help make determinations regarding fire behavior, PNM has created internal training resources to guide field personnel dispatched to evaluate fires from a safe distance. The following sections provide de-energization guidance when an active wildfire(s) threatens to impact PNM assets.

### **7.2.1. Fire Watch / Monitoring**

PNM monitors new fires within a five-mile buffer of its assets using a service that specializes in hazard alerts.

PNM also receives updated fire information as it becomes available through a variety of public websites and apps.

### **7.2.2. Fire Watch Reporting Tool**

In 2025, PNM introduced a new Fire Watch Reporting Tool designed to improve situational awareness and accelerate decision-making during wildfire events. The tool automatically ingests fire information from multiple publicly available sources. These data are then cross-referenced against PNM's geospatial records of known fire locations and system assets. Once a new fire is identified, the tool generates a standardized, formatted email alert that is automatically distributed to the Fire Watch Team. This ensures timely notification and enables the team to triage and analyze new events quickly and consistently. By automating what was once a manual process, the Fire Watch Reporting Tool helps reduce delays in learning of new fires, provides greater accuracy in proximity assessments, and improves the ability to forecast potential impacts on PNM's infrastructure and customers.

### 7.2.3. First Responder De-Energization Requests

A request by first responders will result in PNM personnel responding to the scene, where they will identify the facilities, discuss options, and take appropriate actions including de-energization if necessary.

### 7.2.4. De-Energization Decision Process

When a reported fire is confirmed burning within two miles of PNM assets, is equal to, or greater than, 10 acres in size, and the area is under an RFW\*, PNM personnel will be dispatched to assess and monitor the fire and determine if de-energization is necessary.

Absent an RFW, when a reported fire is confirmed to be burning within one mile of PNM assets and is equal to, or greater than, 10 acres, PNM personnel will be dispatched to assess and monitor the fire and determine if de-energization is necessary.

Field crews will consult with Operations on field conditions and risk to PNM assets. Operations will evaluate alternate switching to continue electric service. Where alternate switching will allow continued electric service, steps will be executed without delay following standard PNM practice.

*\*RFWs are issued by the NWS. PNM is notified of RFWs through its hazard alerting service.*

### 7.2.5. De-Energization Considerations

- Are wildland fuels continuous between the fire and the assets at risk?
- Are wind direction and speed likely to push fire toward PNM assets?
- Have any fire hardening mitigations such as steel construction, fire wraps on wood poles, fiberglass cross-arms, enhanced vegetation treatments, etc., been implemented on the PNM assets at risk?
- Have fire personnel indicated the assets in question may be at risk?
- Does it look like the fire is going to grow significantly in the direction of PNM assets?
- Is it possible that an arc flash from smoke and conductor interaction could occur?

### 7.2.6. Re-Energization

Once the fire area is deemed safe, PNM crews assess potential issues/damage and make any necessary repairs for re-energization.

## 8. Emergency Preparedness

### 8.1. Outreach and Education: Customer Communities, Local, State, Federal Government, Regulatory, and Tribal Government

Community outreach is conducted year-round throughout New Mexico with representatives from local, state, federal appointed and elected officials, communities, NMPRC, co-operatives, other utilities, power market, emergency management, and first responders. Tribal leadership and other non-governmental entities receive regular outreach. PNM Business groups that engage in ongoing community outreach are:

- ❖ Accounts Management
- ❖ Communications: Community Relations and Stakeholder Engagement
- ❖ Crisis Management and Resilience (CMR)
- ❖ Environmental Services Department
- ❖ Government Affairs
- ❖ Power Operations
- ❖ Regulatory
- ❖ Tribal Relations

PNM also conducts outreach activities to familiarize PNM's partners with its operations and capabilities during incidents, such as:

- Evacuation drills.
- Table-top exercises.
- Familiarization tours (for those most likely to respond to a PNM facility during an incident).
- Various land manager and community-driven activities. (Land managers include USFS, BLM, etc. Activities can include business meetings and local Chamber of Commerce events.)
- Functional exercise activities.
- PNM Line Department demonstrations, including electrical arcing and other safety demos.
- Annual balloon rescue training for first responders to familiarize them with techniques when encountering balloons entangled with PNM infrastructure.
- Full-scale exercises.
- Bi-annual grid exercises. (External partners are invited to participate in this NERC-hosted exercise.)

## 8.2. Communication and Collaboration

### 8.2.1. Pre-Incident

To further bolster the capabilities of PNM, continual relationship building occurs between PNM and its external stakeholders, including municipal and wildland firefighters, emergency managers, first responders, Tribal leaders, Tribal emergency managers, and governmental agencies at all levels (including NMDHSEM and EMNRD).

### 8.2.2. During an Incident

PNM ensures that the following groups are available to external partners:

- ❖ CMR
- ❖ Contact Center
- ❖ Corporate Communications\*
  - \*Fills the Public Information Officer (PIO) role within the established external Incident Command System (ICS) structure, as needed.
- ❖ Corporate Security (physical; includes PNM's contract security companies).
- ❖ DOC
- ❖ Government Affairs
- ❖ Key Managed Accounts
- ❖ Line personnel assigned to the incident
- ❖ Regulatory
- ❖ Tribal Relations
- ❖ Wildfire Group

## 9. Support During Wildfire Incidents

### 9.1. Corporate Communications

During a wildfire incident, Corporate Communications' primary role is to ensure that customers and employees are informed and have the tools and information they need to stay safe. Corporate Communications acts as the single voice for the Company, ensures that all information released is current and up-to-date, and is responsible for all internal communications and external interactions with the public and/or media outlets regarding emergency- or disaster-related information.

Corporate Communications works with a variety of media outlets during wildfire events. Incident-related communications pass to and from media outlets through Corporate Communications. Corporate Communications provides real-time updates on social media for customers. As appropriate, Corporate Communications will provide information to employees on internal platforms, such as company memos or on the company's intranet. During an incident, Corporate Communications provides messaging for company department use with external stakeholders who may be requesting updates.

PNM recognizes that wildfire prevention and awareness are important public services it provides to its customers. Before increased wildfire conditions start, Corporate Communications works to raise customer awareness of the work PNM does to lower the risk of its electrical system becoming the ignition source of a wildfire, up to and including a PSPS. Safety and prevention tips are posted on social media platforms, and the same tips are shared with local media in HFRAs. Direct mail pieces, bill inserts, paid social media advertising, paid newspaper advertising, and PNM's customer newsletter Energy Works, may be used as an additional resource to deliver information to customers during peak wildfire conditions and year-round to help them prepare for potential power disruptions during extreme wildfire risk conditions. Town halls have been conducted in HFRAs to keep the community aware of wildfire safety efforts by PNM and local emergency managers, first responders, national/state forestry, local leaders, and the community. PNM has a safety section on [PNM.com/wildfire-safety](https://www.pnm.com/wildfire-safety) that contains wildfire safety topics.

PNM has developed a framework for communicating wildfire mitigation, awareness and PSPS events. Central features of this framework are consistent language based on a PSPS alert system ([PNM.com/PSPS](https://www.pnm.com/PSPS)) that will be updated during PSPS events to keep all customers informed of the current status of their community, providing the risk level and corresponding actions to be taken at any given time. This is where we will direct customers and stakeholders to go for the most reliable and up-to-date information in the days and hours leading up to a potential PSPS.

## 9.2. Customer Support

Wildfires can have a devastating impact on any community. Power may be out for an extended period. PNM's customers will benefit from available communication and information access, particularly those customers who require power for medical devices.

PNM has auto enrolled all customers to receive outage alerts. Those customers will receive notifications if a power outage occurs. Additionally, customers will receive a notification if they are potentially affected by fire-caused power outages, as timing permits. Messaging is also shared on [PNM.com](https://www.pnm.com), television media, radio and social media, as appropriate, and as PNM resources are available.

PNM customers who have energy-dependent medical equipment may also sign up for PNM's LifeWatch service. This service allows customers to designate a caregiver who will receive outage notifications for the LifeWatch customer's premises. LifeWatch enrollment doesn't guarantee always-on electricity, prioritize power restoration, or prevent power interruption due to nonpayment. The service supports efficient communication with LifeWatch customers.

Increased communication and access to information can help ease the financial burden experienced by its customers at an especially traumatic time.

### 9.2.1. Low-Income Customer Support

PNM has numerous programs in place to help low-income customers during and after wildfires. The Public Affairs and Community Outreach Team supports organizations such as the American Red Cross or Salvation Army to provide low-income customer support and may do so during and after wildfire events, resources permitting. PNM's post-fire assistance may include:

- Electric bill assistance from the PNM Good Neighbor Fund.
- Providing payment plans for electric bills.
- Suspending disconnects for non-payment for fire-affected homes/accounts.
- Assisting with deposit waivers or offering other deposit billing solutions.
- Partnering with various community organizations to secure more assistance for families.

## 10. Year-End Recap: Wildfire Projects and Activities

Throughout the year, PNM seeks out emerging industry practices, tools, and technologies to support wildfire risk mitigation through responsible and strategic investments in the grid.

In January 2024, PNM began submitting an annual financial report to the NMPRC, accounting for the prior year's wildfire risk mitigation and VM projects and activities. The report details the operations, maintenance, and capital expenses related to WMP Activities.

The 2025 wildfire and vegetation expense report is included in full in **Appendix D**.

## 11. 2026 and Beyond

For 2026, PNM will continue to engage in grid hardening and resilience activities, along with formalized cyclical vegetation trim in HFRA. Exciting developments also include:

- Continued analysis and possible augmentation of SA tools and technologies. PNM may augment its network of weather stations.
- Ongoing evolution of Design and Standards of adding new wildfire mitigation technologies to the grid, such as weather stations, ignition detection cameras.
- Analysis of outage-ignition data from data collection pilot project that began in 2025 to begin to inform prioritized mitigation activities.
- Maturation of a risk-informed investment strategy. Current practice of prioritizing risk mitigation investments includes assessing known infrastructure age, asset health, last inspection results, history of remediations and/or rebuilds, outage data to strategically focus on remediation, and risk-reduction activities.
- Improvement of data collection, validation, and governance to formalize good data practices and use.
- Adding a staff meteorologist to support daily operations.
- Adding wildfire-specific engineer(s) to support pilot projects, operational mitigations, and grid hardening activities.

### 11.1. Pilot Projects Continuing Through 2026

- Completion of a communicated fault indicator trial in Q1 of 2026. Identification of a second product for trial.
- Installation and assessment of three covered wire trials.
- Sub-segmentation of existing HFRA to refine areas of potential PSPS impact.
- Use of hyperlocal weather stations to support more timely and accurate weather reports.
- Implementation of an in-house pilot drone program (with staff pilots).

## 12. Conclusion

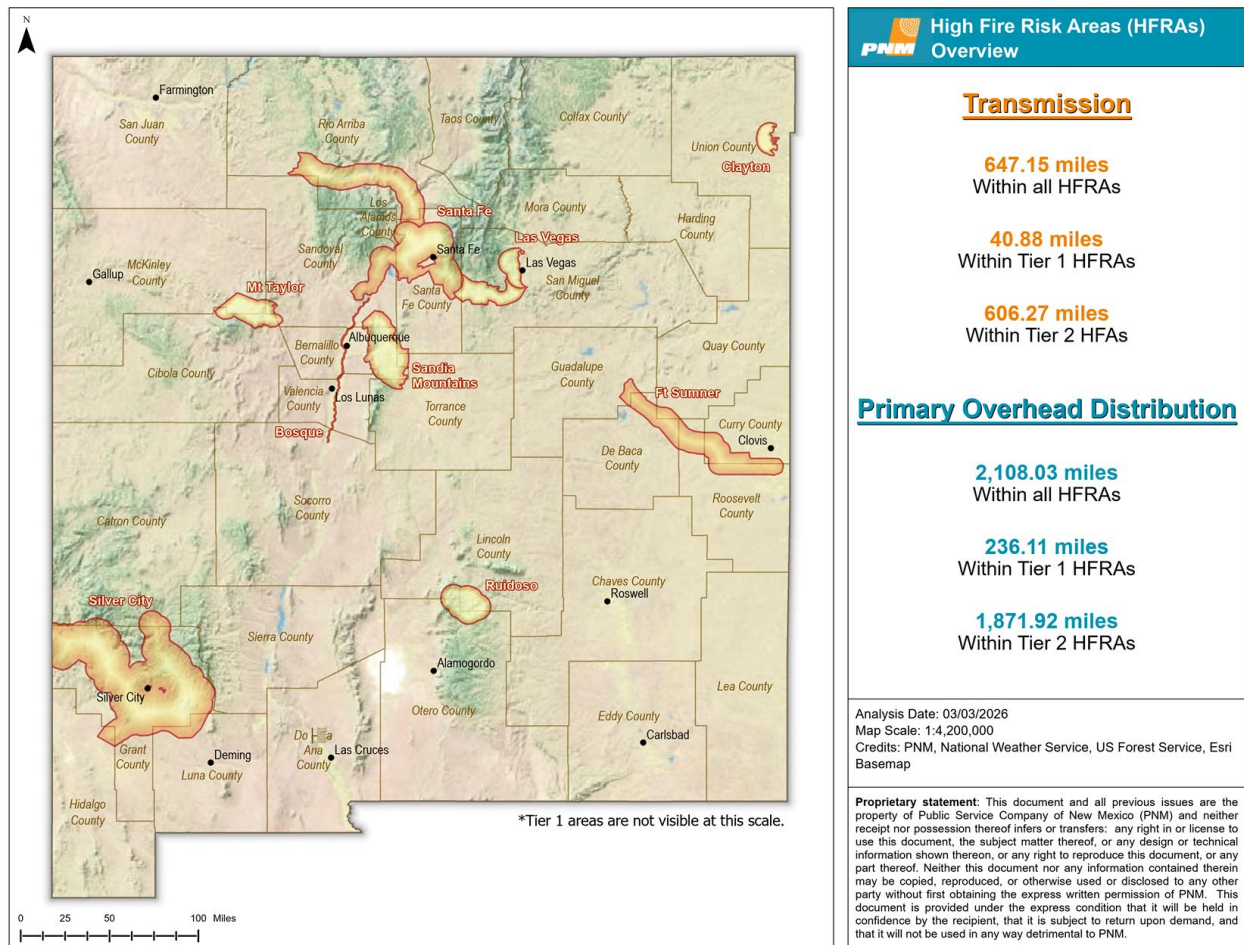
PNM remains steadfastly committed to proactively approaching wildfire mitigation activities in a thoughtful and methodical way to support the safety of our communities, cultures, and customers. Risks from wildfire affect us all, and we recognize that effective, informed, and innovative mitigation strategies require constant effort and review.

This WMP, reviewed and updated annually, incorporates industry approaches, technology advances, lessons learned from operational experiences and feedback from our community partners, first responders, and emergency managers. With ongoing collaboration and community partnerships, PNM will continue improving this WMP to best address evolving environmental conditions and utility asset conditions to help safeguard our communities with a safe, reliable, and resilient energy system.

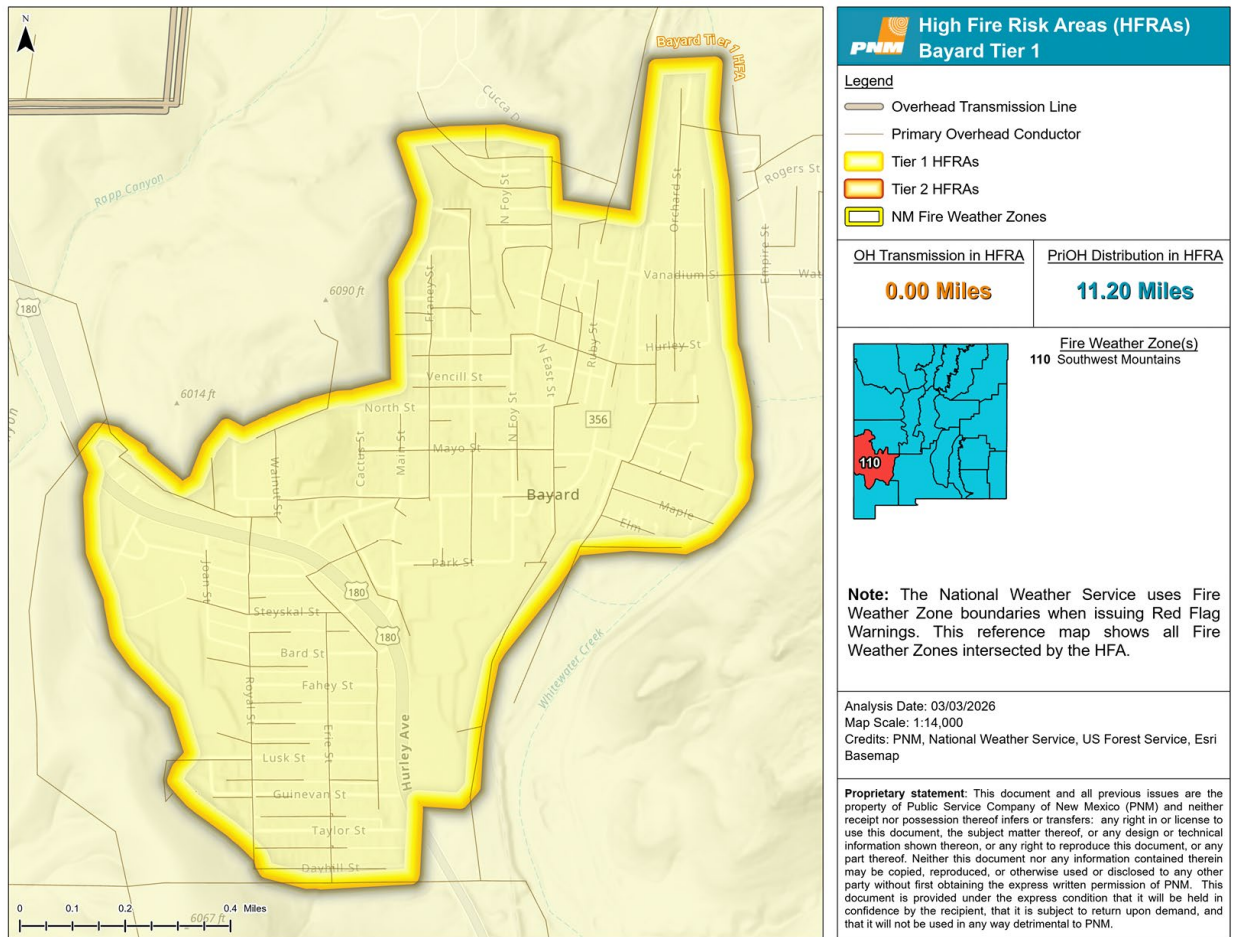
# APPENDIX A

## HIGH FIRE RISK AREA MAPS

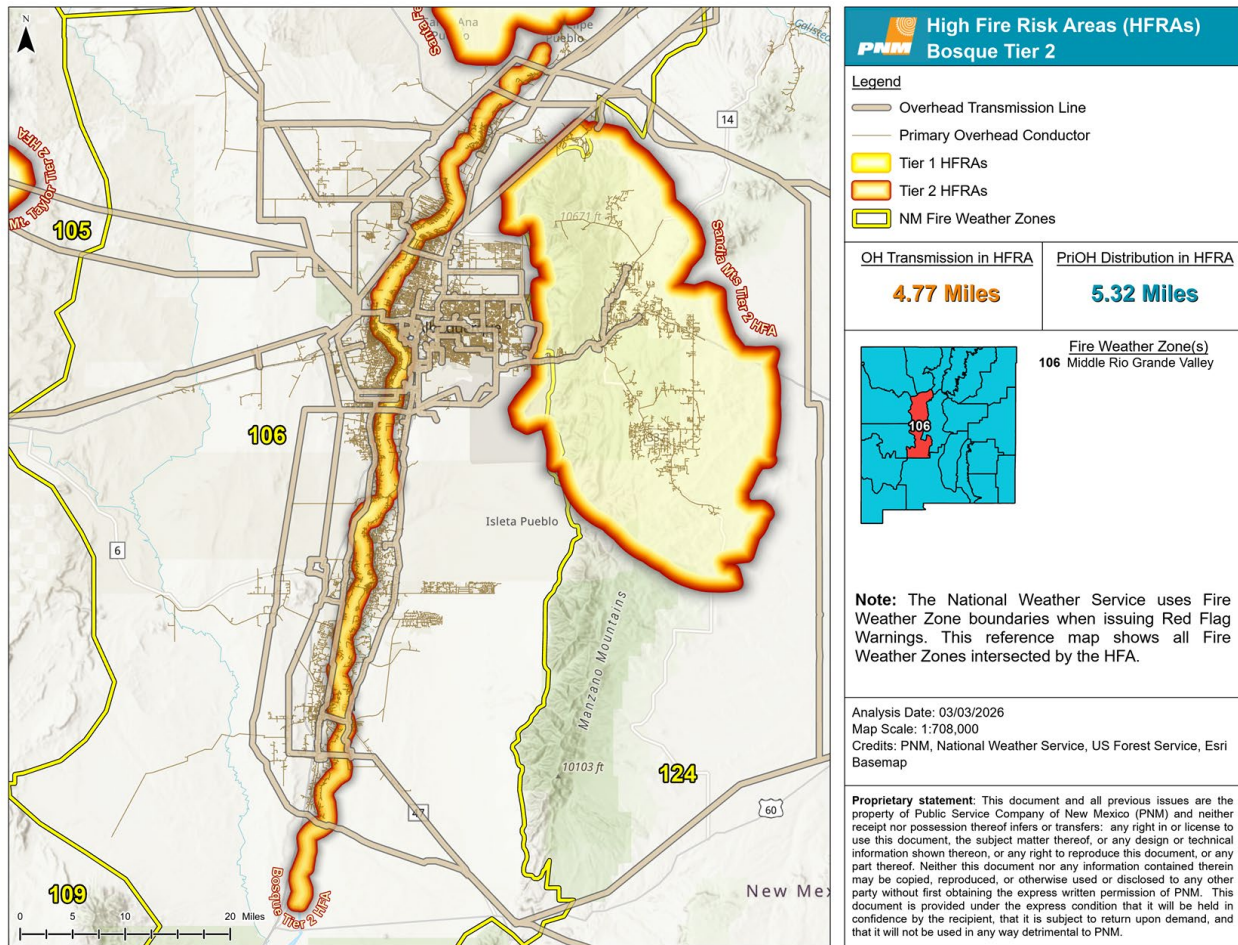
## High Fire Risk Areas (HFRAs): Overview



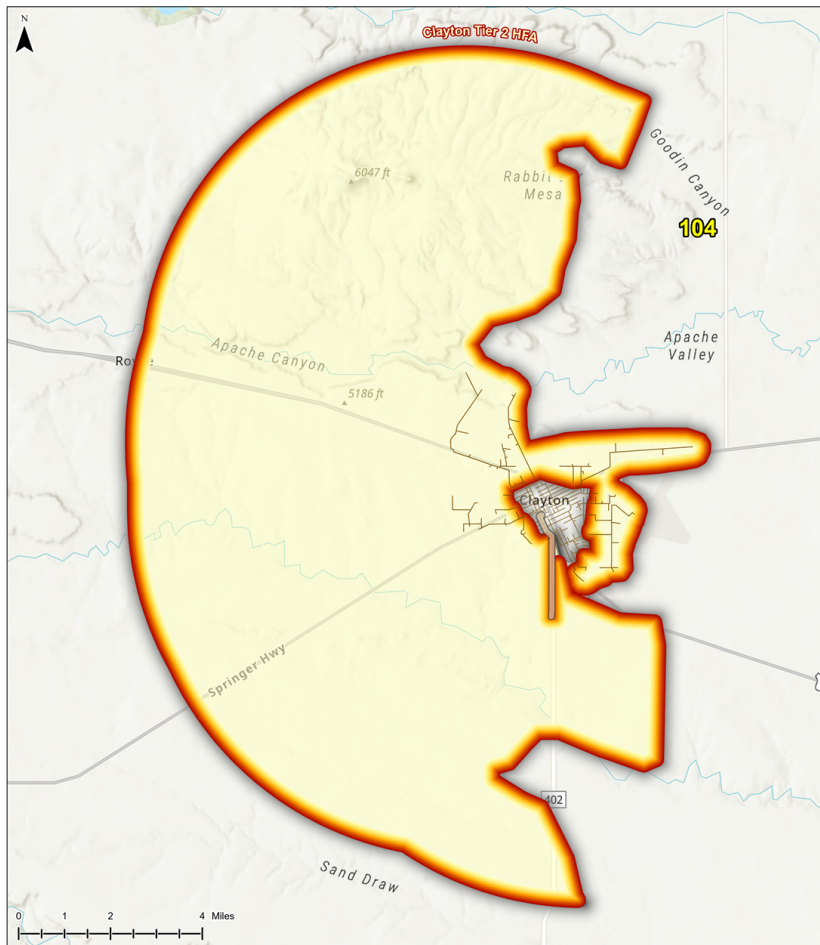
## High Fire Risk Areas (HFRA): Bayard Tier 1



### High Fire Risk Areas (HFRA): Bosque Tier 2



## High Fire Risk Areas (HFRAs): Clayton Tier 2

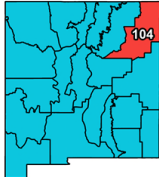


**PNM** High Fire Risk Areas (HFRAs)  
Clayton Tier 2

**Legend**

- Overhead Transmission Line
- Primary Overhead Conductor
- Tier 1 HFRAs
- Tier 2 HFRAs
- NM Fire Weather Zones

OH Transmission in HFA	PriOH Distribution in HFA
<b>0.00 Miles</b>	<b>19.23 Miles</b>



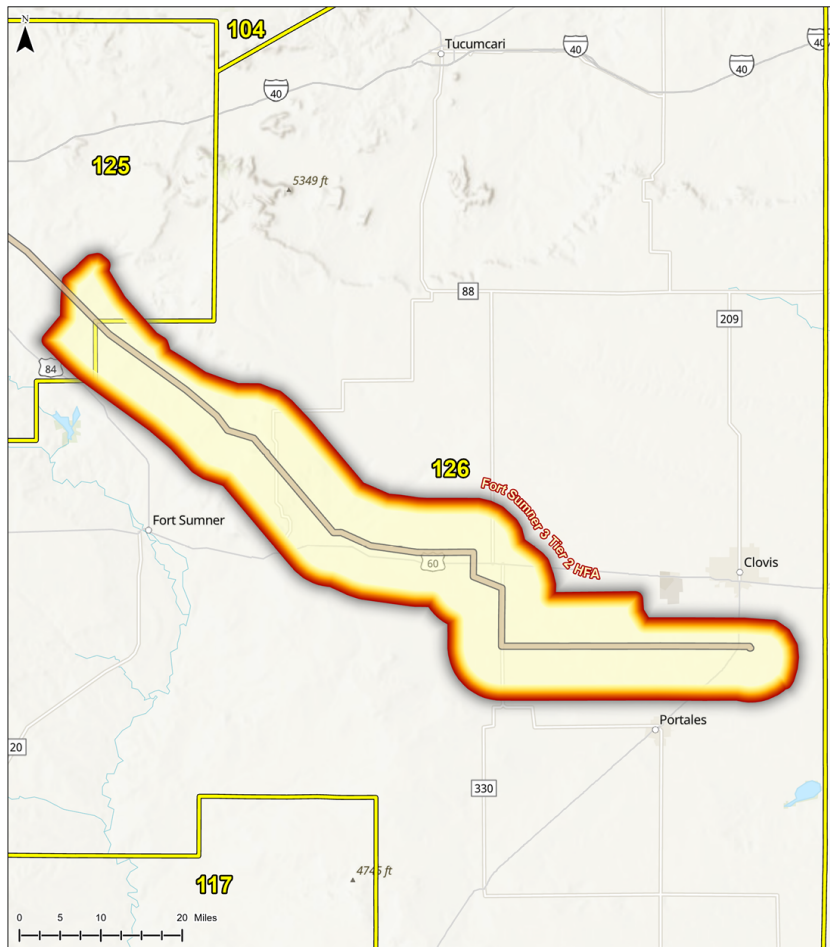
**Fire Weather Zone(s)**  
104 Northeast Plains

**Note:** The National Weather Service uses Fire Weather Zone boundaries when issuing Red Flag Warnings. This reference map shows all Fire Weather Zones intersected by the HFA.

Analysis Date: 03/03/2026  
Map Scale: 1:162,000  
Credits: PNM, National Weather Service, US Forest Service, Esri Basemap

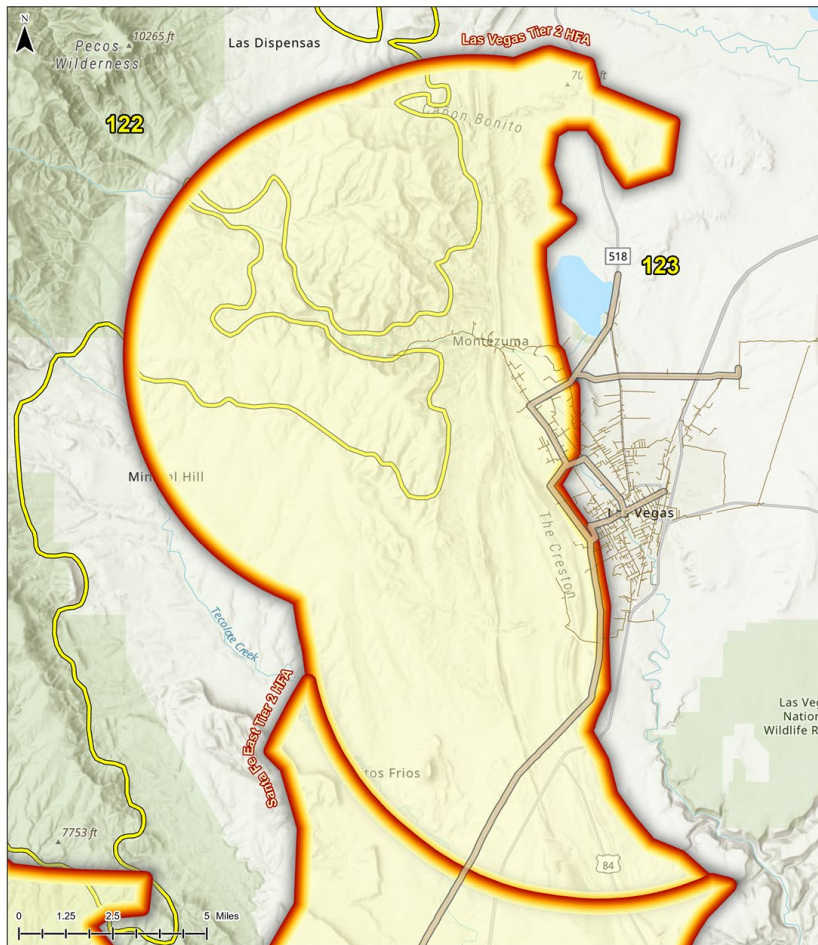
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## High Fire Risk Areas (HFRA): Fort Sumner 3 Tier 2



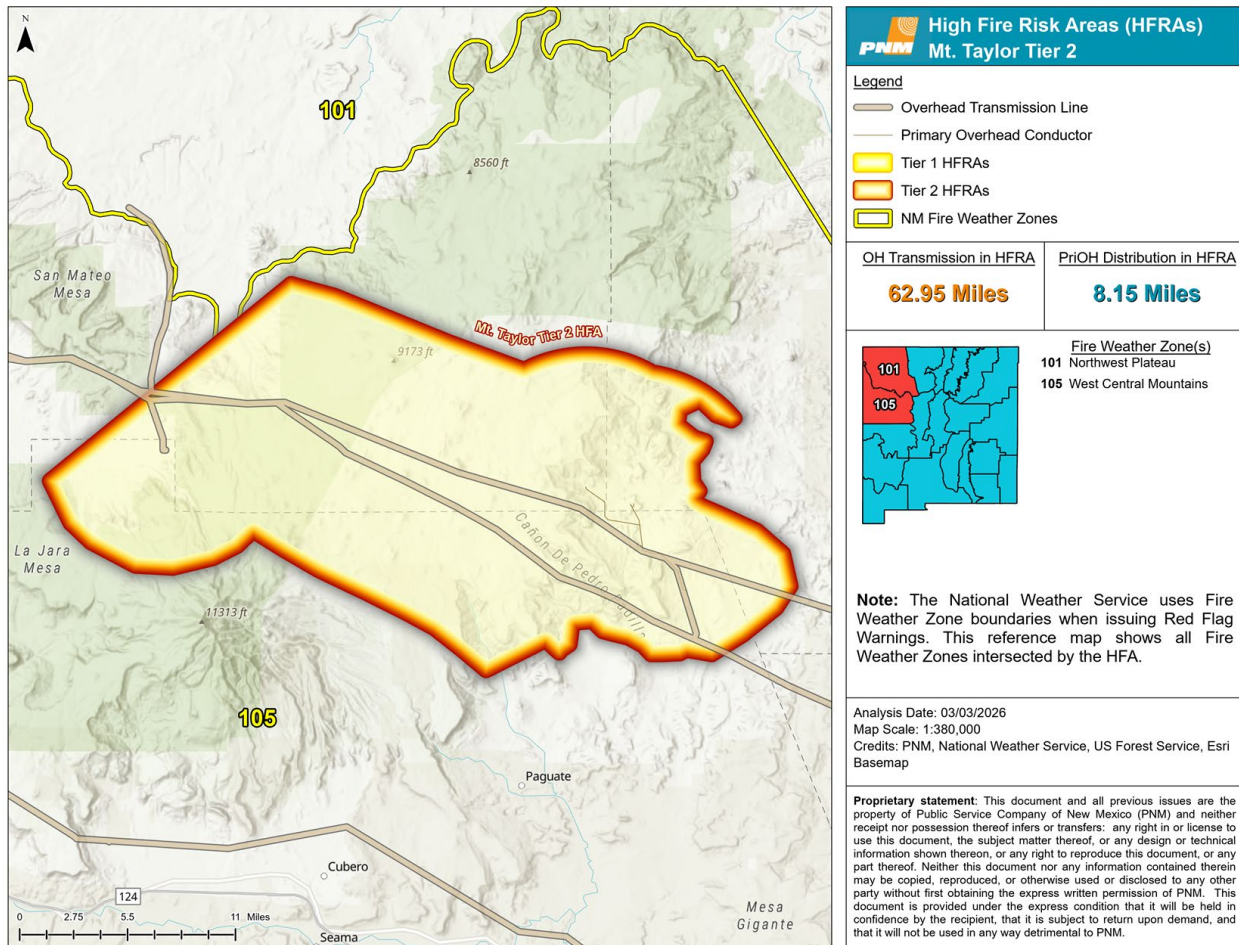
PNM High Fire Risk Areas (HFRA) Fort Sumner 3 Tier 2	
<b>Legend</b> Overhead Transmission Line Primary Overhead Conductor Tier 1 HFRA Tier 2 HFRA NM Fire Weather Zones	
<b>OH Transmission in HFRA</b> <b>88.36 Miles</b>	<b>PriOH Distribution in HFRA</b> <b>0.00 Miles</b>
<b>Fire Weather Zone(s)</b> 125 Central Highlands 126 East Central Plains	
<p><b>Note:</b> The National Weather Service uses Fire Weather Zone boundaries when issuing Red Flag Warnings. This reference map shows all Fire Weather Zones intersected by the HFA.</p>	
Analysis Date: 03/03/2026 Map Scale: 1:916,000 Credits: PNM, National Weather Service, US Forest Service, Esri Basemap	
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## High Fire Risk Areas (HFRAs): Las Vegas Tier 2

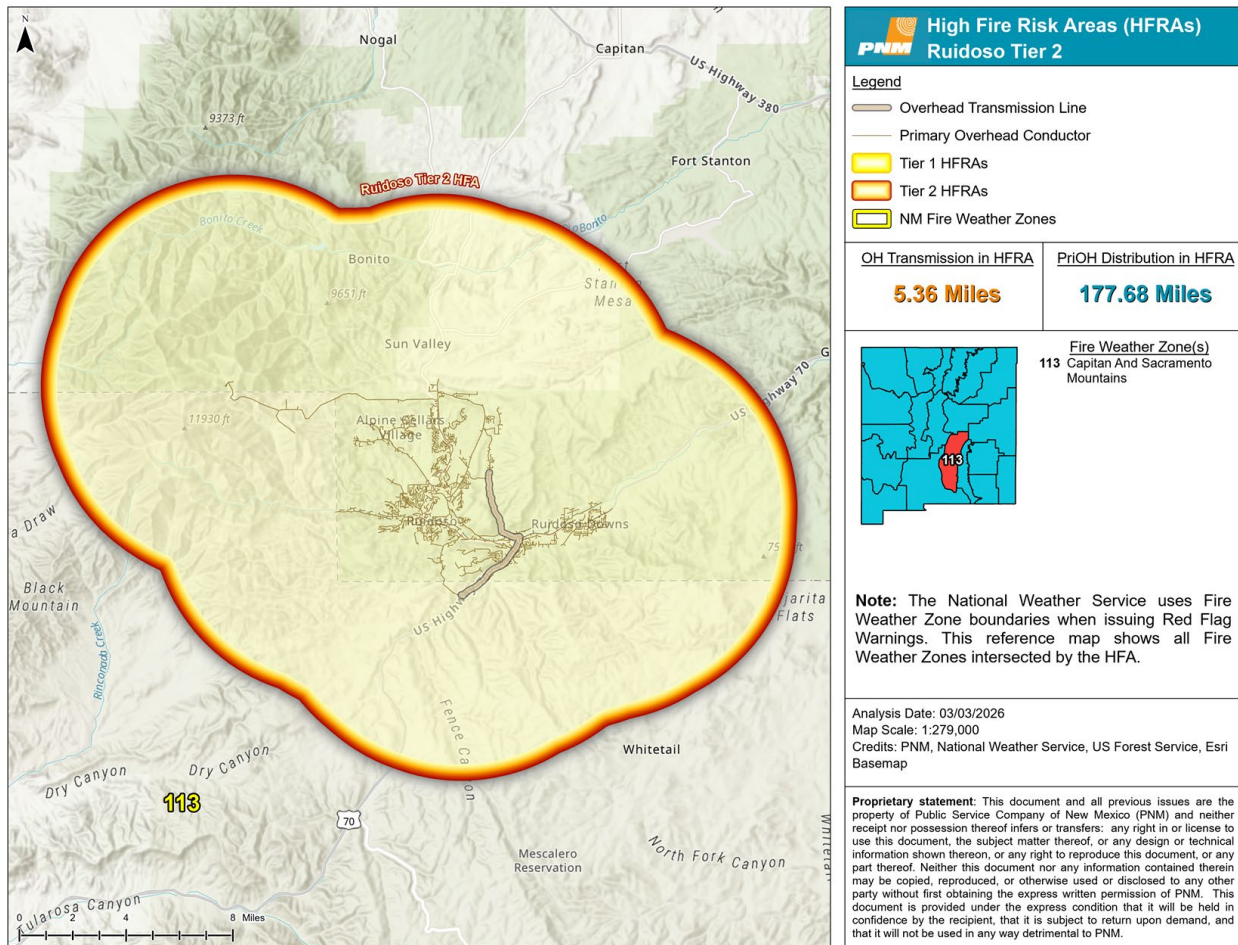


High Fire Risk Areas (HFRAs) Las Vegas Tier 2	
<b>Legend</b> Overhead Transmission Line Primary Overhead Conductor Tier 1 HFRAs Tier 2 HFRAs NM Fire Weather Zones	
<b>OH Transmission in HFRA</b> <b>14.94 Miles</b>	<b>PriOH Distribution in HFRA</b> <b>23.33 Miles</b>
<b>Fire Weather Zone(s)</b> 122 Sangre de Cristo Mountains 123 Northeast Highlands	
<p><b>Note:</b> The National Weather Service uses Fire Weather Zone boundaries when issuing Red Flag Warnings. This reference map shows all Fire Weather Zones intersected by the HFA.</p>	
Analysis Date: 03/03/2026 Map Scale: 1:198,000 Credits: PNM, National Weather Service, US Forest Service, Esri Basemap	
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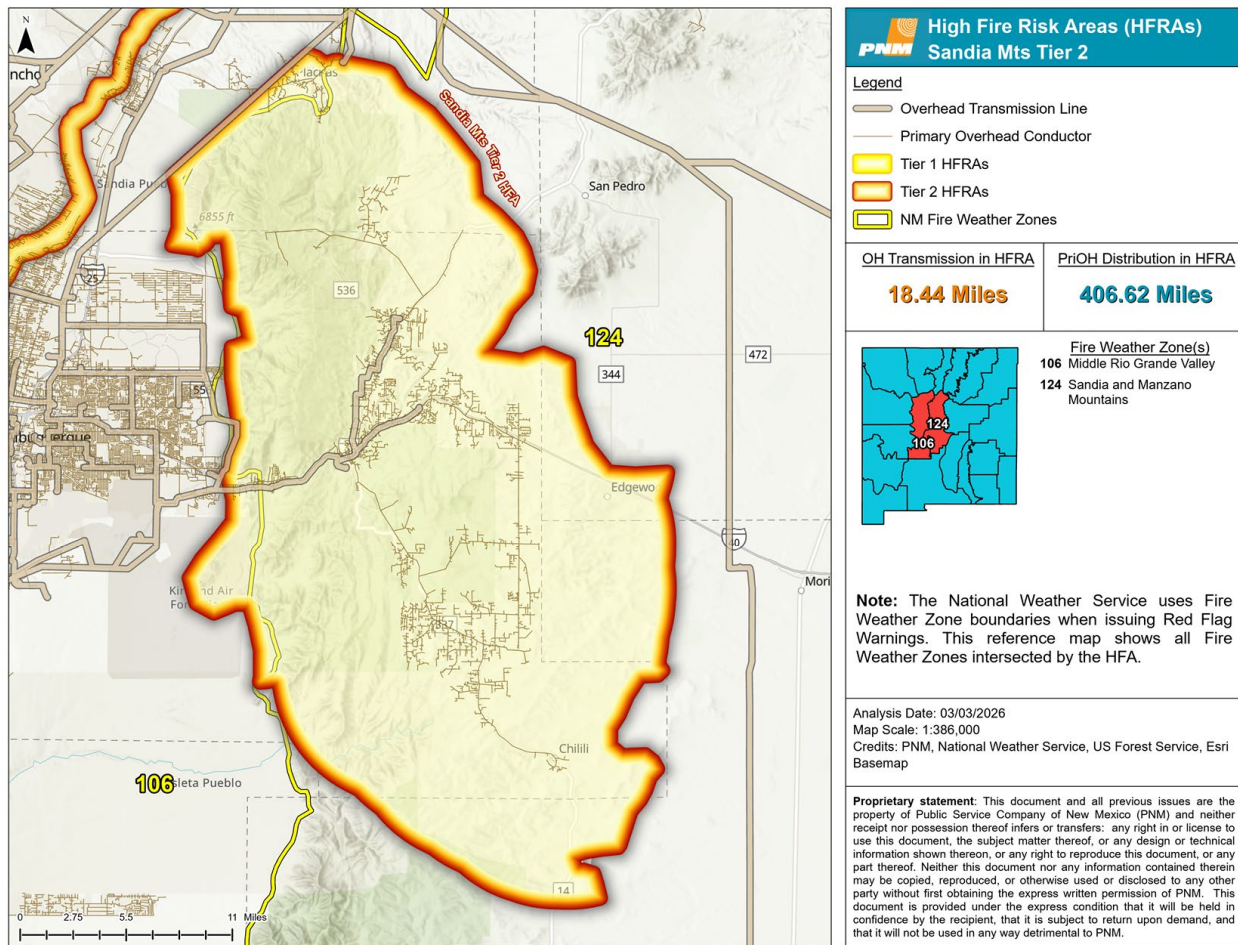
## High Fire Risk Areas (HFRAs): Mt. Taylor Tier 2



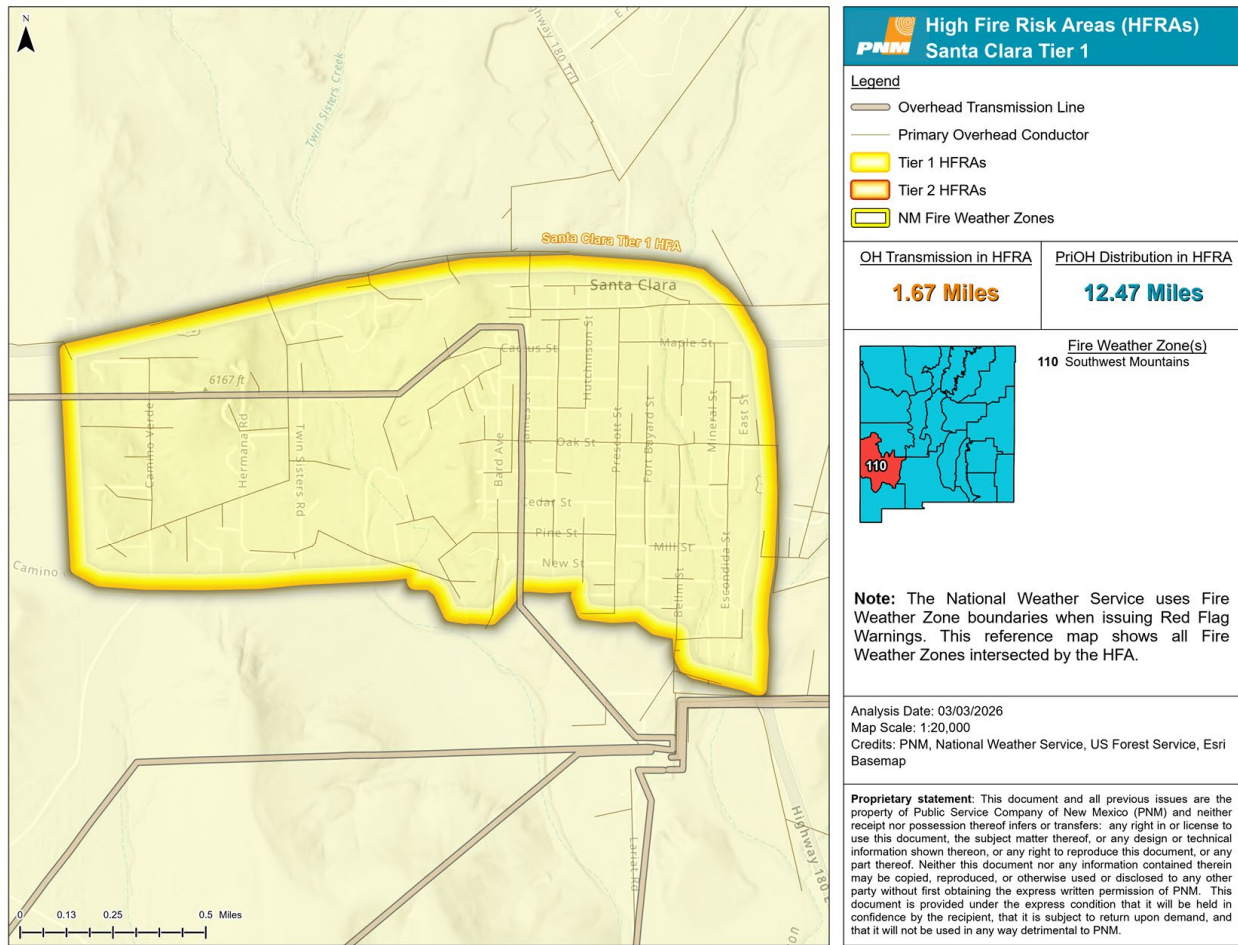
## High Fire Risk Areas (HFRAs): Ruidoso Tier 2



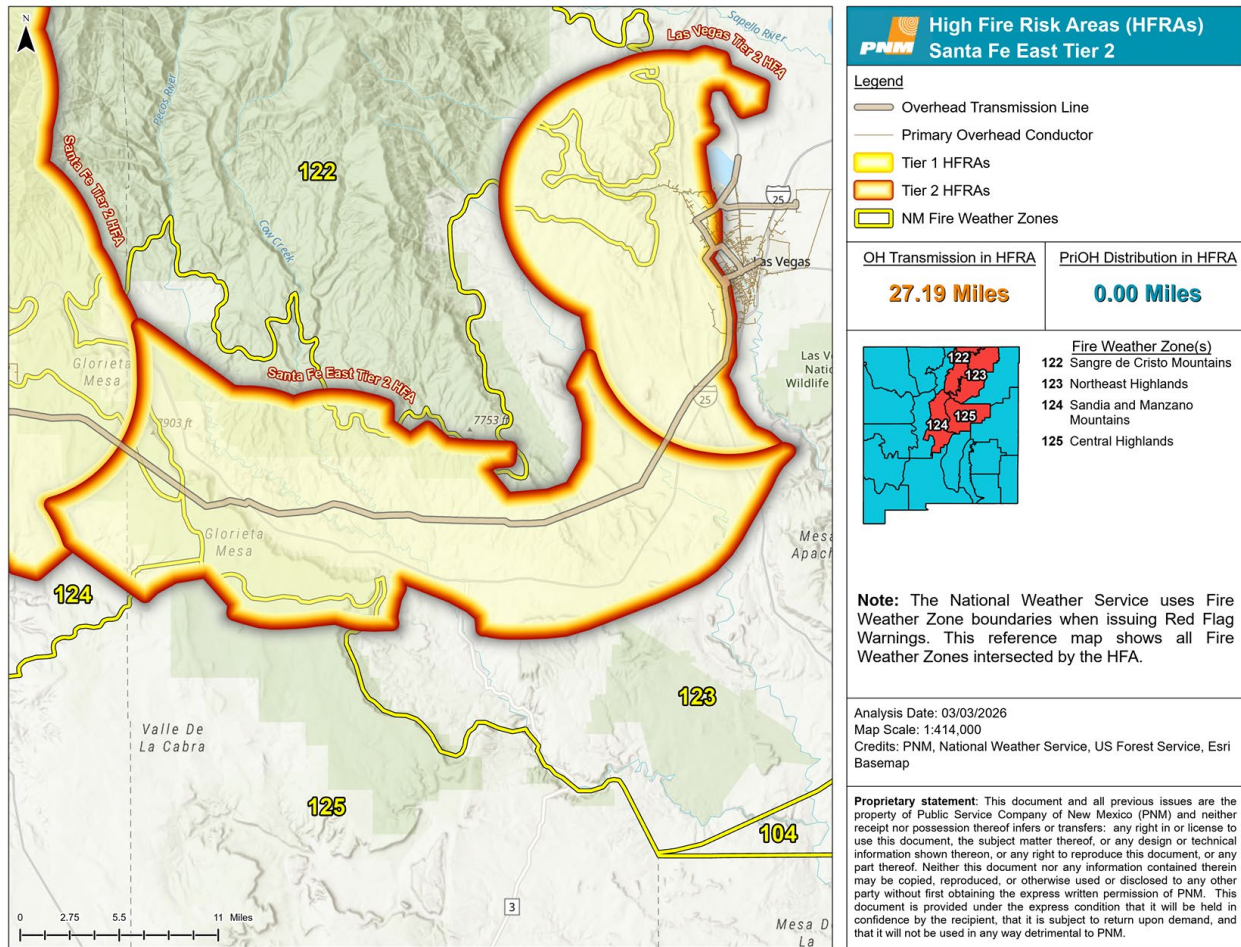
## High Fire Risk Areas (HFRA): Sandia Mts Tier 2



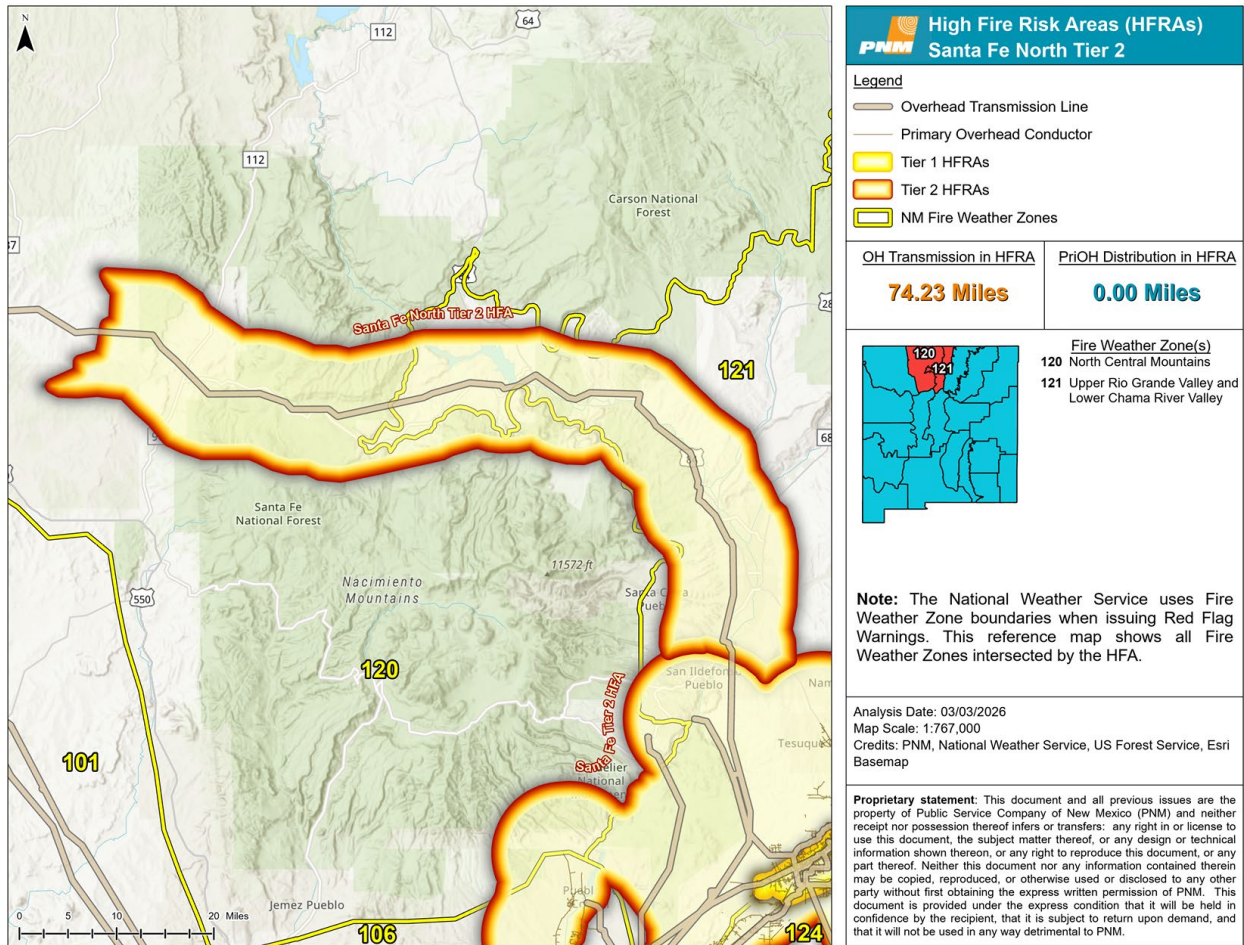
### High Fire Risk Areas (HFRA): Santa Clara Tier 1



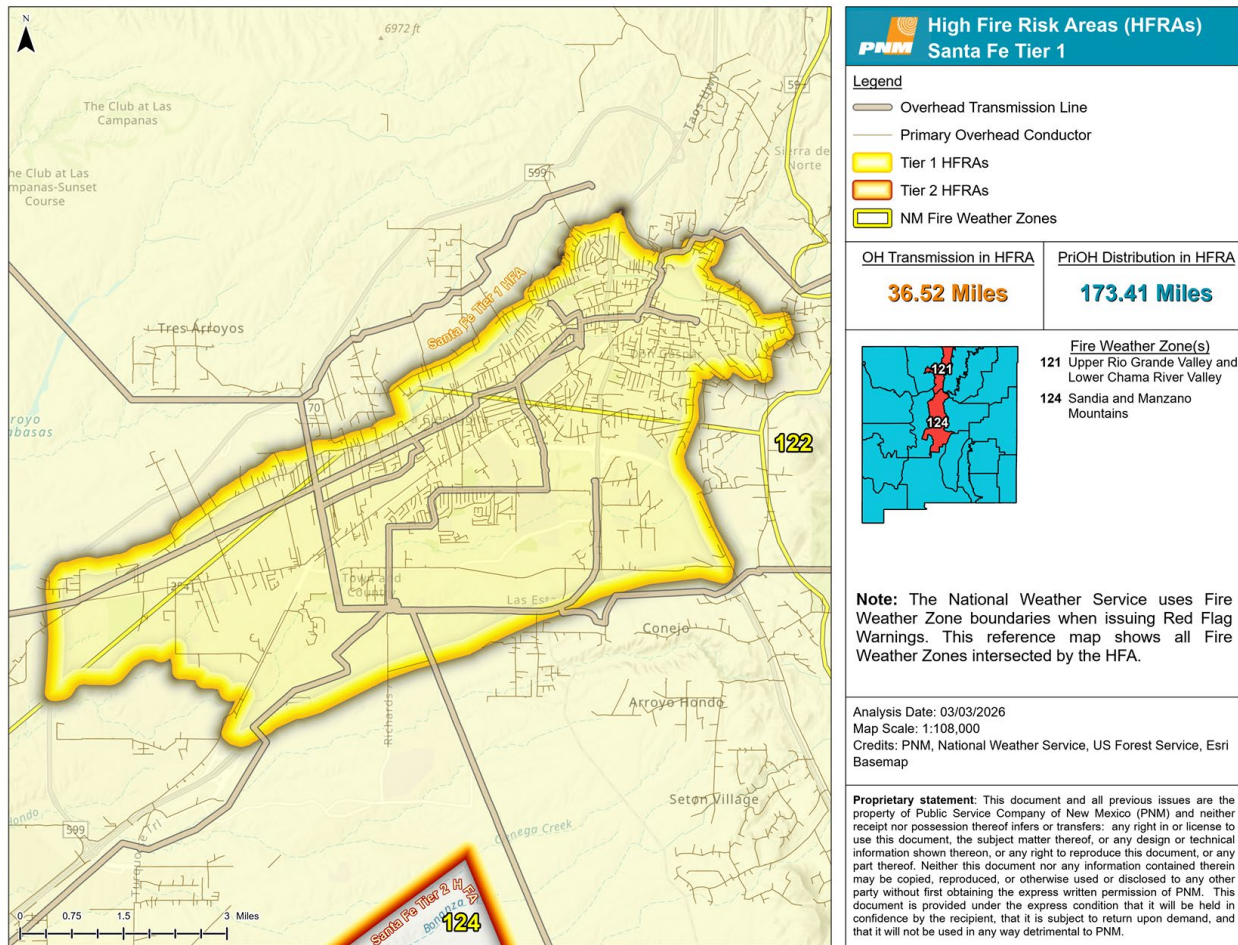
## High Fire Risk Areas (HFRAs): Santa Fe East Tier 2



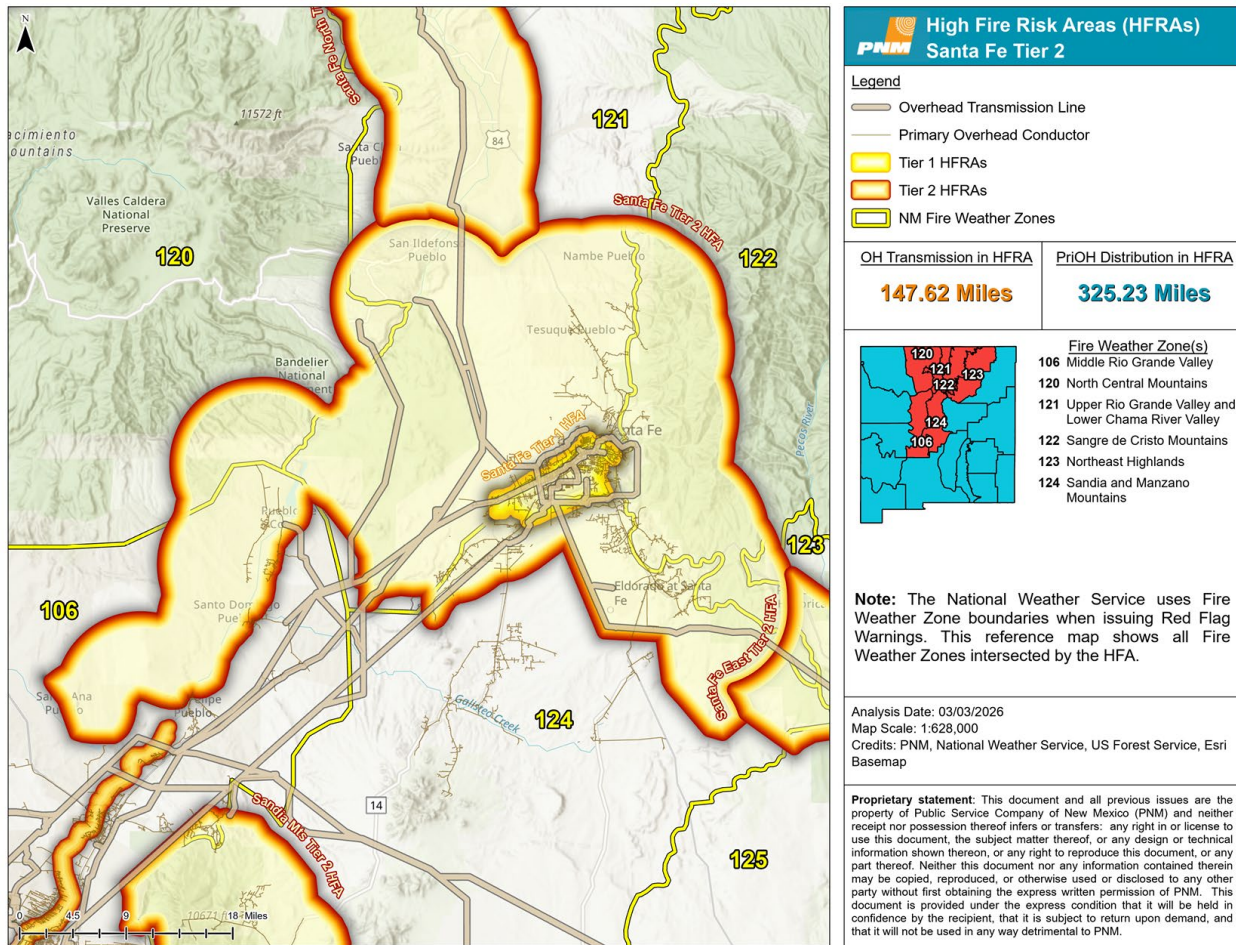
## High Fire Risk Areas (HFRAs): Santa Fe North Tier 2



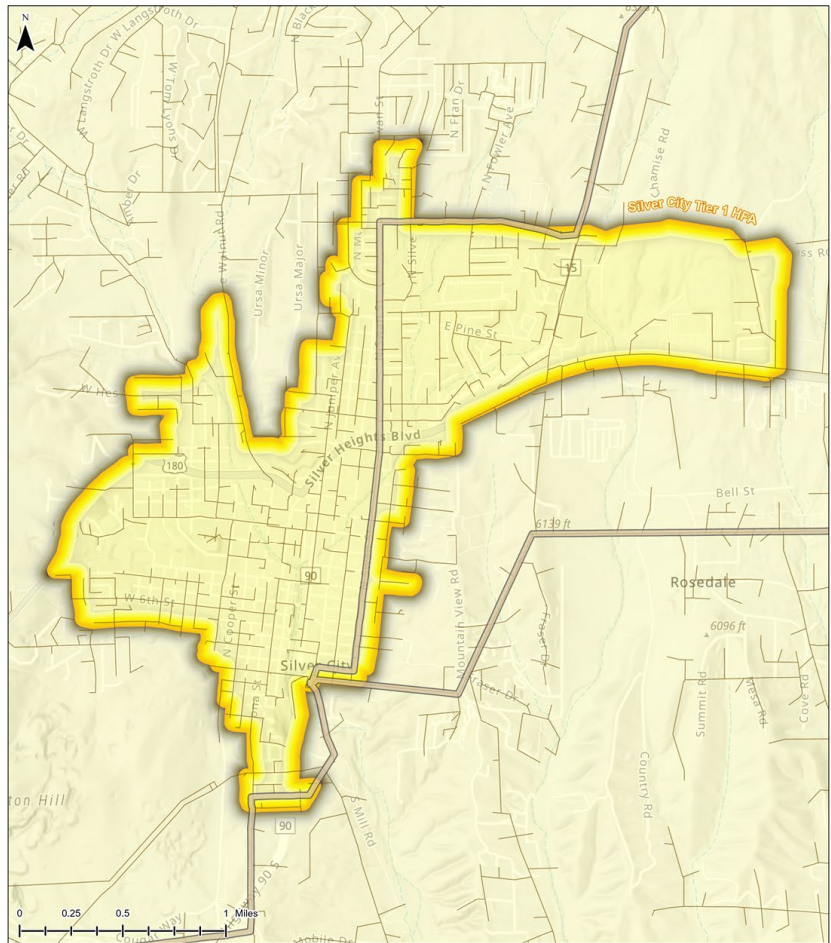
## High Fire Risk Areas (HFRAs): Santa Fe Tier 1



## High Fire Risk Areas (HFRAs): Santa Fe Tier 2

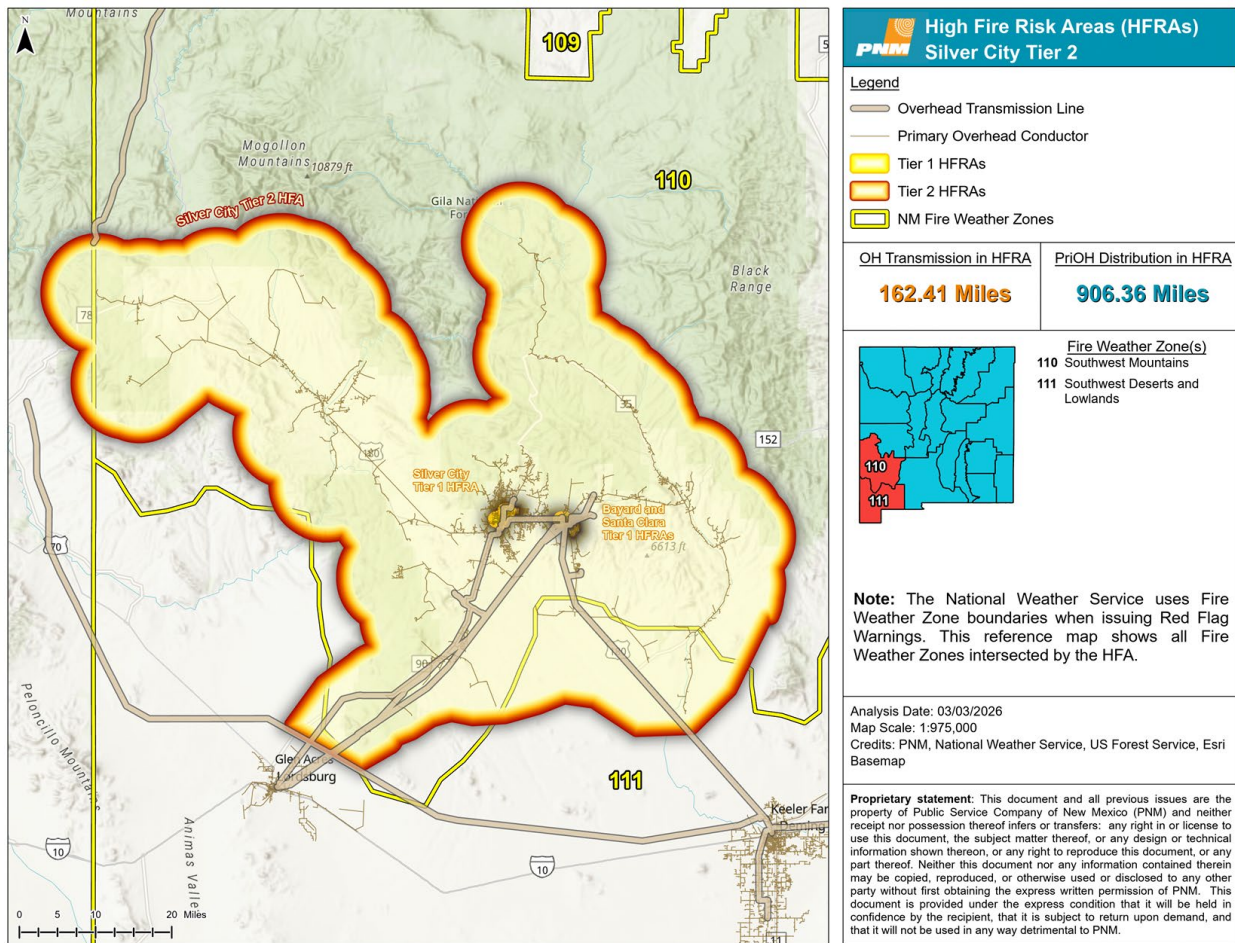


## High Fire Risk Areas (HFRA): Silver City Tier 1



PNM High Fire Risk Areas (HFRA) Silver City Tier 1	
<b>Legend</b>	
	Overhead Transmission Line
	Primary Overhead Conductor
	Tier 1 HFRA
	Tier 2 HFRA
	NM Fire Weather Zones
<b>OH Transmission in HFRA</b> <b>2.69 Miles</b>	<b>PriOH Distribution in HFRA</b> <b>39.03 Miles</b>
<b>Fire Weather Zone(s)</b> 110 Southwest Mountains	
<b>Note:</b> The National Weather Service uses Fire Weather Zone boundaries when issuing Red Flag Warnings. This reference map shows all Fire Weather Zones intersected by the HFA.	
Analysis Date: 03/03/2026 Map Scale: 1:36,000 Credits: PNM, National Weather Service, US Forest Service, Esri Basemap	
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## High Fire Risk Areas (HFRA): Silver City Tier 2



# APPENDIX B

## PNM WMP – TECHNICAL GLOSSARY

<b>Term</b>	<b>Definition</b>
Artificial Intelligence (AI)	The use of computer systems and algorithms capable of analyzing large datasets, recognizing patterns, and supporting predictive modeling. In wildfire mitigation planning, AI is used to assess wildfire risk, analyze environmental data, and support operational decision-making.
Asset Hardening	Engineering modifications made to electrical infrastructure to improve resilience against wildfire, extreme weather, and other hazards.
Athena Intelligence	An AI-driven system used to assess wildfire risk by combining public datasets and fire behavior models.
Avian Protection Plan (APP)	A strategy for reducing wildlife-related electrical hazards, minimizing bird and animal contact with power lines.
Boots-on-the-Ground Inspection	A physical field inspection of power infrastructure to assess risks and maintenance needs.
Burn Probability	A statistical measure indicating the likelihood of wildfire occurrence in a given area.
Capacitor Bank	An electrical device used for power factor correction and voltage regulation in the grid.
Completely Self-Protected Transformer (CSP)	A type of transformer with built-in protection mechanisms that reduce ignition risks.
Conditional Risk Score	A numerical value representing the potential severity of a wildfire event.
County Warning Area (CWA)	A region designated by the National Weather Service for issuing warnings and forecasts.
Covered Primary Wire	A type of insulated electrical wire used to reduce the risk of arcing and ignitions in wildfire-prone areas.

Distribution Infrastructure	The network that delivers electricity from high-voltage transmission lines to consumers at usable voltages
Edison Electric Institute (EEI)	An association representing electric companies, focusing on reliability, safety, and environmental practices.
Electric Power Research Institute (EPRI)	A nonprofit organization conducting research on electricity generation, delivery, and use.
Fault Locating Sensors	Devices used to detect and pinpoint faults in power lines to enhance response time and wildfire prevention. Also referred to as Fault Detectors
Fiberglass Crossarm	A non-combustible and dielectric/non-conducting support structure for power lines that helps reduce fire risks compared to wooden crossarms.
Fire Operating Conditions (FOC)	A classification of wildfire risk levels used to guide operational mitigations and field work restrictions.
Fire Operating Conditions Forecast (FOCF)	A forecast of classification of wildfire risk levels used to guide operational mitigations and field work restrictions.
Fire Physics and Behavior	The study of how fire ignites, spreads, and behaves under different environmental conditions.
Fire Watch	A designated individual or team responsible for monitoring fire risks during high-risk activities.
Fire Weather Watch (FWW)	An alert issued when weather conditions may soon support the rapid spread of wildfires.
Fire Weather Zone (FWZ)	A defined area with similar climate, weather, and terrain characteristics used by the National Weather Service for issuing fire weather alerts.
Fire-Retardant Treatment	A chemical or physical treatment applied to infrastructure to reduce flammability and fire spread.
Fuse	A protective device that protects circuits from overcurrent by melting/ failing by design when exposed to excessive current

Geographic Information System (GIS)	A system used for mapping and analyzing, among other things, wildfire risk areas, infrastructure locations, and vegetation conditions.
Guy Strain Insulator	A component used to insulate guy wires from electrical currents, reducing potential ignition risks.
Hazard Tree	A tree that could fail and contact electrical infrastructure, potentially causing outages or wildfire ignition.
High Fire Risk Area (HFRA)	A designated area where utility infrastructure, such as power lines and substations, is vulnerable to wildfires, and where ignitions from infrastructure may cause damaging wildfires.
Incident Command System (ICS)	A standardized approach to emergency response management, facilitating coordination between agencies and organizations during wildfire incidents.
Indji Watch	A natural hazard alerting system used by PNM to monitor and receive real-time updates on wildfires, weather conditions, and other potential threats.
Integrated Vegetation Management (IVM)	A utility Vegetation Management practice that promotes native, low-growing plant communities to reduce wildfire risks near power lines.
Internal Fault Detector (IFD)	A device installed in transformers to quickly identify faults and prevent potential ignition sources.
Lightning Arrester	A device used to protect electrical equipment from damage caused by lightning strikes by safely diverting current.
Light Detection and Ranging (LiDAR)	A remote sensing method used to measure distances and generate high-resolution maps, employed in wildfire mitigation for vegetation and terrain analysis.
Locational Risk Score	A rating that assesses fire risk based on geography, fuel conditions, and other factors.
Multiplex Cable	A jacketed or covered electrical cable type used to replace open-wire secondary lines, reducing wildfire risks.

National Electric Safety Code (NESC)	A code that sets the safety standards for power generation, transmission, and distribution systems.
National Fire Danger Rating System (NFDRS)	A standardized system used to estimate wildfire danger based on weather and fuel conditions.
North American Electric Reliability Corporation (NERC)	An organization ensuring the reliability and security of the electrical grid.
Open Wire Secondary	Unjacketed or bare wire that carries lower voltage electricity (typically 120-480 volts) from a transformer to homes and businesses
Outage Management System (OMS)	A system used to detect, analyze, and respond to power outages, playing a role in wildfire prevention by identifying faults.
Predictive Service Area (PSA)	A geographic area used for forecasting significant wildfire potential and supporting resource allocation decisions.
Public Safety Power Shutoff (PSPS)	A proactive measure taken by a utility during extreme weather conditions to de-energize electrical facilities in high wildfire risk areas to prevent ignitions.
Recloser	An automatic switch that detects faults and momentarily interrupts power before restoring service, adjusted in high fire risk areas to prevent ignitions.
Red Flag Warning (RFW)	A National Weather Service (NWS) alert issued when weather conditions support extreme wildfire behavior, including high winds, low humidity, and dry fuels.
Relay	An electrically operated switch that uses a low-power signal to control a high-power circuit for protection and/or automation
Remote Automated	A network of weather monitoring stations providing real-time data to assess fire danger conditions.

Weather Station (RAWS)	
Right-of-Way (ROW)	A designated strip of land for power lines, which requires Vegetation Management to prevent wildfire ignitions.
Rural Electric Association (REA)	A cooperative entity providing electricity to rural areas.
Single-Phase	A two-wire alternating current (AC) system typically using one power wire and one neutral wire. Sometimes used in conjunction with “lateral” to denote a line tapping off a main line.
Situational Awareness (SA)	A process of continuously monitoring environmental and operational conditions to assess wildfire risks and inform mitigation strategies.
Sectionalizing	The dividing of an electrical grid into segments to improve reliability and increase operational flexibility.
Strike Tree	A tree outside the utility right-of-way that could fall and contact electrical conductors.
Substation	A facility within an electrical generation, transmission and distribution system that transform voltages, either up or down, or provides other functions.
Supervisory Control and Data Acquisition (SCADA)	A control system used to monitor and manage electrical grid operations, enhancing wildfire risk mitigation through remote system operating changes.
Tailboard Safety Plan	A pre-work safety briefing outlining fire risk mitigation measures for utility crews. Sometimes referred to as a Job Safety/ Hazard Analysis, or Safety Tailboard.
Three-Phase	Typically made up of three power wires and one neutral wire with each power wire carrying a separate AC signal. All three AC signals are 120 degrees out of phase with each other.
Transformer	A device that reduces or increases the voltage of alternating current.

Transmission Infrastructure	High-voltage power lines and substations that move bulk electricity from generation facilities to distribution substations.
Utility Tree Risk Assessment (UTRA)	A structured method used to evaluate trees near powerlines for failure risk.
Vegetation Management (VM)	A program designed to minimize wildfire risks by managing vegetation growth around power lines and electrical infrastructure.
Western Electricity Coordinating Council (WECC)	A regional entity responsible for promoting grid reliability and wildfire risk mitigation.
Wildfire Hazard Potential (WHP)	A model used to estimate the likelihood and potential severity of wildfires in specific areas.
Wildfire Mitigation Guidelines	A set of best practices and policies designed to reduce wildfire ignition risks from electrical infrastructure.
Wildfire-Safe Lightning Arresters	A device used to protect electrical equipment from damage caused by lightning strikes by safely diverting current that is designed to not emit sparks.
Wildland Urban Interface (WUI)	Areas where development meets or intermixes with wildland vegetation.
Wind Alerts	Automated notifications based on forecasted wind speeds that could impact wildfire spread.
Wood Pole Test and Treat Program	A systematic evaluation of wooden power poles to determine their structural integrity, and an application of a preservative to increase their useful life.

# APPENDIX C

## PNM WMP – NEW MEXICO GEOGRAPHY, FLORA, AND CLIMATE

## New Mexico Geography, Flora, and Climate

New Mexico's landscape is defined by striking climatic and ecological diversity, shaped largely by its broad range of elevations, latitude, and topographical complexity. The state predominantly falls within hot semi-arid and cold semi-arid climate classifications, with some areas exhibiting semi-arid continental characteristics. These regimes are marked by wide diurnal temperature swings, low relative humidity, and highly variable precipitation patterns. The southern third of the state lies within the Chihuahuan Desert, the largest desert in North America, which contributes to the region's overall aridity and shapes its distinctive desert ecosystems.

The state encompasses a mosaic of ecological zones, ranging from shrub- and grass-dominated plains to alpine forests and glaciated mountain peaks. Vegetation cover is generally sparse in lowland areas, where soils are often exposed due to limited rainfall and minimal organic accumulation. Grasses occur in scattered bunches typical of semi-arid rangelands. These grasslands gradually give way to savanna woodlands and semi-desert shrublands in eastern New Mexico, where mesquite, yucca, and various cacti appear alongside drought-tolerant grasses.

Riparian zones—primarily located along the Rio Grande, Pecos, and Canadian Rivers—offer higher moisture availability and support gallery forests of cottonwood and willow which serve as critical habitat corridors and contribute to regional biodiversity. At higher elevations, montane and subalpine forests present a vertical stratification of coniferous species. Piñon-juniper woodlands dominate the lower foothills, transitioning to ponderosa pine at mid-elevations and eventually giving way to mixed conifers including Douglas fir, white fir, and Engelmann spruce near the tree line.

Climatically, New Mexico is one of the sunniest states in the U.S., averaging more than 280 days of sunshine annually, second only to Arizona.<sup>16</sup> The state's elevation profile, which ranges from approximately 2,800 feet to over 13,000 feet, drives extreme temperature variability. High desert basins can exceed 120°F during summer heatwaves, while alpine zones may reach winter lows of -50°F.<sup>17</sup> Average annual precipitation across the state is approximately 13 inches, but this figure masks substantial regional variation: mountainous regions may receive over 30 inches, while desert valleys receive far less.<sup>18</sup> The North American Monsoon System (NAMS), also known as the Southwest Monsoon, is typically active in New Mexico from July through September and delivers a significant portion of annual rainfall in intense bursts.<sup>19</sup>

Wind patterns, particularly from April through May, contribute to elevated wildfire risk due to strong, dry, and often gusty conditions.<sup>20</sup> These months also coincide with the peak of wildfire activity, which typically runs from March to October. However, typical periods of heightened wildfire conditions are

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<sup>16</sup> <https://edd.newmexico.gov/choose-new-mexico/climate-geography/>

<sup>17</sup> <https://www.britannica.com/place/New-Mexico>

<sup>18</sup> <https://www.britannica.com/place/New-Mexico/Climate>

<sup>19</sup> <https://www.weather.gov/abq/prepawaremonsoonintro>

<sup>20</sup> [https://www.weather.gov/abq/features\\_highwind](https://www.weather.gov/abq/features_highwind)

increasing across the globe. In New Mexico and other Western states, the average period of wildfire activity has lengthened by more than 100 days.<sup>21</sup>

Recent years—specifically 2024 through 2025—have demonstrated this marked lengthening of peak wildfire conditions, with ignitions occurring as early as March and persisting into November. PNM marked elevated wind conditions occurring in December, as well. This trend correlates with ongoing drought conditions, fuel accumulation, and warmer spring temperatures.<sup>22</sup> While the monsoon season typically moderates fire activity mid-summer in central and southern portions of the state, the variability and weakening of monsoon patterns in recent years have reduced the reliability of this seasonal reprieve.<sup>23</sup>

Collectively, New Mexico’s diverse topography, semi-arid climate, and increasingly erratic precipitation patterns create a complex and evolving wildfire risk environment that requires adaptive mitigation planning.

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<sup>21</sup> <https://earth.org/fire-prone-weather-days-on-the-rise-as-planet-heats-up-study/>

<sup>22</sup> <https://wfca.com/wildfire-articles/new-mexico-fire-season/>

<sup>23</sup> <https://www.npr.org/2021/07/21/1018686260/rain-during-monsoon-season-is-becoming-less-reliable-less-effective>

# APPENDIX D

## **PNM WMP – WILDFIRE MITIGATION VEGETATION MANAGEMENT AND INFRASTRUCTURE MAINTENANCE EXPENSE 2025 ANNUAL REPORT**

## WILDFIRE MITIGATION VEGETATION MANAGEMENT AND INFRASTRUCTURE MAINTENANCE EXPENSE 2025 ANNUAL REPORT

### Incremental Wildfire Mitigation Expenses:

Table 1 provides the actual incremental wildfire mitigation expenses for 2024 and 2025.

**Table 1**

<b>Incremental T&amp;D O&amp;M &amp; CAPITAL Expenditures Related to Wildfire Mitigation Plan Activities</b>			
<b>WMP Activity</b>	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>	<b>FERC account</b>
<b>O&amp;M</b>			
Wildfire Mitigation Management - Transmission	\$ 297,827	\$ 207,333	571, Maintenance of overhead lines (Transmission - major);
Wildfire Mitigation Management - Distribution	\$ 718,950	\$ 696,893	593, Maintenance of overhead lines (Distribution - major)
<b>O&amp;M TOTAL</b>	<b>\$ 1,016,777</b>	<b>\$ 904,226</b>	
<b>CAPITAL</b>			
Ignition Detection, Situational Awareness Cameras and Weather Stations - Transmission	Pilot kicked off in 2025	\$ 225,682.45 (pre-tax)	N/A
Ignition Detection, Situational Awareness Cameras and Weather Stations – Distribution	Pilot kicked off in 2025	\$ 683,634.35 (pre-tax)	N/A
<b>CAPITAL TOTAL</b>		<b>\$ 909,316.80</b>	
<b>Total O&amp;M &amp; CAPITAL</b>	<b>\$ 1,016,777</b>	<b>\$ 1,813,542.80</b>	

#### *Remote Data Collection*

Artificial Intelligence (“AI”) Enhanced Data Fusion integrates satellite remote sensing data sources with advanced AI models to predict vegetation related risks and optimize vegetation management strategies.

#### *Whether Transmission and Distribution Facilities are Replaced as a Result of the Mitigation*

PNM conducts field evaluations of facilities to determine resiliency and integrity for future wildfire safe operations. If a facility is deemed to not meet standards, PNM will replace these Transmission and Distribution (“T&D”) facilities as needed. Replacements of these facilities are included in PNM’s capital and expense expenditures.

*Resulting Impact of Reducing Wildfire Risks*

PNM has implemented new software that relies on collected satellite imagery and AI to identify hazard trees and vegetation encroaching close to its power lines to optimize vegetation management. PNM further revised its Wildfire Mitigation and Public Safety Power Shutoff plans. PNM also revised its engineering standards for wood poles within Hazardous Fire Areas (“HFRA”) to a structurally stronger and taller poles, wider crossarms, and wrapped all new poles with fire-resilient mesh coatings to improve resiliency and wildfire sustainability.

In 2025, PNM started a pole replacement program of all wood T&D poles that were tested and had defects within its HFRA. All poles with serious defects and immediate need to be replaced have been replaced. PNM has replaced 687 poles identified with minor defects in 2025. Remaining poles will be finished throughout 2026 All the work above will help reduce wildfire risks.

*Enhancing Situational Awareness*

A camera and weather station pilot program kicked off in 2025 to support enhanced situational awareness, wildfire ignition detection, and track hyperlocal weather data. PNM established 66 weather stations and sited 8 ignition detection cameras throughout HFRA on select transmission and distribution poles. See Table 1.

**Vegetation Management Costs:**

Table 2 provides the actual incremental wildfire mitigation expenses for 2024 and 2025, the annual contract, labor and equipment costs related to managing vegetation, and emergency preparedness expenditures as requested by Staff.

**Table 2**

<b>Incremental T&amp;D O&amp;M Expenditures Related to Vegetation Management</b>				
<b>Vegetation Management (VM)</b>	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>	<b>Total O&amp;M 2025</b>	<b>FERC account</b>
Additional Transmission Vegetation	\$ 307,198	\$ 554,422	\$ 819,998	571, Vegetation Management of overhead lines
Additional Distribution Vegetation	\$ 2,799,167	\$ 3,009,030	\$ 5,403,894	593, Vegetation Management of overhead lines
HFRA Distribution Cyclical Vegetation Management Program	Program did not exist in 2024	\$ 1,133,503	\$ 1,133,503	593, Vegetation Management of overhead lines
<b>Total</b>	<b>\$ 3,106,365</b>	<b>\$ 4,696,955</b>	<b>\$ 7,357,395</b>	
<b>Emergency Preparedness Expenditures Related to Vegetation Management</b>				
<b>Vegetation Management (VM)</b>	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>	<b>Description</b>	

Wildfire Response and Recovery and	\$ 2,643,153	\$ 1,075,919	Trout Fire & South Fork Fire VM response
Recovery and Restoration Activities	\$ 2,886,796	\$ 1,528,426	Gila National Forest ROW VM expansion project
<b>Total</b>	\$ 5,529,949	\$ 2,604,345	

*Location of Vegetation Management Activities*

In 2025, PNM prioritized HFRAs as outlined below; vegetation management was also conducted in non-HFRAs throughout New Mexico. PNM uses publicly available USFS Wildfire Hazard Potential (“WHP”) dataset, which ranks hazard potential in five classes ranging from Very Low to Very High and includes each Fire Weather Zone (“FWZ”).

HFRA Name	Type of Facility	Area (Sq. mi.)	FWZ	Predictive service area (PSA) (primary)	PNM Division
Bosque	T&D	29	NM106	SW09 South/Central NM Lowlands	Sandoval Albuquerque Valencia
Clayton East	T&D	13	NM 104	SW13 northeast NM/NW TX	Clayton
Clayton West	T&D	97	NM 104	SW13 northeast NM/NW TX	Clayton
Fort Sumner 3	Transmission	819	NM 125 & 126	SW13 northeast NM/NW TX	Eastern NM
Las Vegas	T&D	135	NM 122 & 123	SW1- Sangre de Cristo Mtns	Las Vegas
Mt. Taylor	T&D	298	NM 105	SW07 Northwest NM Mtns	Ambrosia Lake Marquez
Ruidoso	T&D	312	NM 113	SW12 South/Central NM Mountains	Ruidoso
Sandia Mtns	T&D	492	NM 106 & 124	SW11 Central NM Mtns & Plains	East Mountain
Santa Fe	T&D	961	NM 105, 106 & 121	SW10 Sangre de Cristo Mtns SW07 Northwest NM Mtns	Santa Fe
Santa Fe East	Transmission	251	NM 124 & 126	SW10 Sangre de Cristo Mtns	Santa Fe
Santa Fe North	T&D	704	NM 120 & 121	SW07 Northwest NM Mtns	Santa Fe
Silver City	T&D	2867	NM 110	SW08 White Mtns & Gila Region	Silver City

*Resulting Impact on Reducing Wildfire Risk*

PNM’s Utility Vegetation Management (“UVM”) incorporates Integrated Vegetation Management (“IVM”) principles to reduce wildfire risk and promote ecological health. UVM identifies and mitigates potential ignition sources, decreases available fuels, creates defensible spaces/firebreaks, and improves access for emergency responders.

**Infrastructure Maintenance Expense:**

Tables 3 and 4 provide actual incremental infrastructure maintenance expenses for 2024 and 2025, and the annual costs related to infrastructure maintenance, as requested by Staff.

**Table 3**

**Incremental T&D O&M Expenditures Related to Aging T&D Infrastructure Maintenance Activities**

<b>Aging Infrastructure Maintenance Activities</b>	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>	<b>FERC account</b>
Increased Maintenance – Transmission	\$ 146,630	\$ 207,333	563, Overhead line expense (Transmission – major)
Overhead lines – Distribution	\$ 1,604,567	\$ 1,051,728	593, Maintenance of overhead lines (Distribution – major)
Underground lines – Distribution	\$ 2,122,188	\$ 2,354,780	594, Maintenance of underground lines (Distribution – major)
<b>Total</b>	<b>\$ 3,873,385</b>	<b>\$ 3,613,841</b>	

**Table 4**

<b>Total Infrastructure Maintenance Expenditures</b>		
	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>
Maintenance – Transmission	\$ 4,275,038	\$ 2,889,999
Maintenance – Distribution	\$ 11,741,294	\$ 9,931,729
<b>Total</b>	<b>\$ 16,016,332</b>	<b>\$ 12,821,728</b>

*Cause of the Expenditures*

PNM’s efforts include maintaining the Company’s T&D substations to ensure these critical facilities' safe and reliable operation. The number of substations has increased over the last several years due to significant growth. The increased number of substation assets requires additional funding to conduct regular maintenance. Transmission Line expenditures include the costs of staffing, equipment, materials, and supplies needed to inspect, diagnose, and repair or replace transmission assets within PNM’s service territory. This work consists of both planned maintenance activities and emergent work in response to equipment damage or failures.

*How the Costs Resulted in Reducing Wildfire Risks*

PNM’s maintenance and asset management activities contribute to reducing wildfire risks by identifying and mitigating equipment deficiencies that could potentially be ignition sources for wildfires. Line patrols are conducted to identify broken cross arms; failed insulators, cutouts, and lightning arrestors; detached guys; floating conductors; etc. PNM also installs bird guarding on field assets to reduce the chance of birds and critters catching fire and falling to the ground.

*Fires in the State of New Mexico*

Within PNM's service territory, the South Fork and Salt Fires required wildfire response and recovery expenditures. The New Mexico State Forestry Division identified these fires in its 2025 Annual Report. See <https://www.emnrd.nm.gov/wp-content/uploads/EMNRD-2025-AR-final.pdf>. PNM is providing page 14 of the report as Attachment 1.

**Costs Associated with PNM’s Wildfire Mitigation Plan (WMP):**

PNM’s Wildfire Mitigation Plan is reviewed annually prior to wildfire season and revised as needed. The WMP provides information on PNM’s progress and work to date along with advancement toward our mitigation objectives. The Plan covers wildfire risk drivers, programs and strategies to mitigate them. The document is available on PNM.com/wildfire-safety/. (See Attachment 2 to this report). A breakdown of the costs associated with the revisions to the WMP are included in Table 5 and are a subset of costs provided in Table 2.

*The 2025 WMP contains five program elements:*

1. The risk analysis comprehensively assesses wildfire risk throughout the PNM’s geographic information system (GIS) assessment to identify areas with the highest wildfire risk. PNM can use the results to prioritize fire hardening activities, enhance inspection and maintenance activities, implement field work restrictions during critical fire weather and make system operations decisions. The substation assessment required onsite assessments to determine which substations are at highest risk of having an internal equipment fire spread. PNM prioritizes treatments for substations that score highest in its risk assessments.
2. The preventive programs and strategies include vegetation management, outage and ignition management, engineering and technical solutions, implementing design and construction practices, enhanced inspection and maintenance, and system protection from wildfire. These efforts focus on HFRAs in PNM’s system and are in addition to routine vegetation management conducted on other facilities.
3. The fire weather operating plan implements industry best practices for increasing situational awareness based on meteorological conditions, predictive tools, and monitoring. Improved situational awareness informs operational practices, such as the need to escalate work restrictions or implementing a public safety power shutoff (“PSPS”). PSPS events require close coordination between PNM field operators, dispatchers, state, local and federal agencies and the community at-large.
4. The WMP’s emergency preparedness element includes wildfire response and recovery of wildfire zones.
5. PNM provides support during wildfire incidents by assisting with fire discovery and reporting, as well as developing and applying methods to assess fire risk and communicate fire information effectively.

**Table 5  
2025 WILDFIRE MITIGATION PLAN PROGRAM ELEMENTS**

VENDOR / PROJECT	PROGRAM ELEMENTS / DESCRIPTION	2025 O&M COSTS
ACRT	Emergency Preparedness, Preventative Programs & Strategies: Vegetation trimming (proactive and restoration activities)	\$ 104,240.44
Advanced Network Management Inc.	Technology upgrades for emergency operations, virtual meetings	\$ 10,102.00

PNM – WMP 2026

AI Dash Inc.	Preventative Programs & Strategies, Risk Analysis of HFRAs: AI, Subscription, identification of HFRA-related vegetation trimming planning and maintenance	\$ 435,368.75
Athena	Preventative Programs & Strategies, Risk Analysis of HFRAs: Subscription (3-year), Fire Risk Assessment (Satellite imagery, AI)	Paid in 2024
Clearion	Preventative Programs & Strategies: ESRI based data-mapping	(\$ 39,014.00)
Cloudfire Inc. & Pyrecast	Preventative Programs & Strategies, Risk Analysis of HFRAs, Fire Weather & Operational Strategies: GIS – HFRA layer, Pyrecast subscription, risk assessment, meteorological consulting, situational awareness, PSPS support, HFRA refinement	\$ 254,344.59
Davey Tree Surgery Company	Preventative Programs & Strategies, Emergency Preparedness: Vegetation Management, proactive and responsive vegetation management	\$ 898,514.09
EDM International	Preventative Programs & Strategies: Project Management, Engineering Services, Technical Solutions. Fire Weather & Operational Strategies: Support for (66) weather stations sited throughout HFRAs, situational awareness	\$ 310,960.48
E-Source Companies LLC (IWRMC)	Preventative Programs & Strategies: Subscription – International Wildfire Risk Mitigation Consortium	\$ 48,660.88
Graphics	High Fire Risk Area Maps	\$ 368.08
Indji Systems Inc. (IndjiWatch)	Fire Weather & Operational Strategies: Weather forecasting, Fire, Red Flag Warning, extreme weather alerts, daily situational awareness	\$ 115,485.56
Law Office of Stephen B. Waller LLC	Legal support	\$ 2,131.00
PED LLC	Preventative Programs & Strategies: Engineering services, technical support	\$ 24,326.34
Randy Lyle & Associates LLC	Preventative Programs & Strategies, Risk Analysis of HFRAs, Fire Weather & Operational Strategies: Risk assessment, consulting, situational awareness, PSPS support, substation assessment, training material, fire subject matter expert	\$ 183,341.08
Writers for Hire	Preventative Programs & Strategies: Document creation, formatting	\$ 17,341.97
Cameras	Fire Weather & Operational Strategies: Support for ignition detection cameras. situational awareness	\$ 15,928.13
Weather Stations	Fire Weather & Operational Strategies: Wind Study - Support for siting (66) weather stations sited throughout HFRAs, situational awareness	(\$ 35,837.89)
Customer Support During Wildfire & PSPS Incidents, Proactive Outreach & Education, Recovery	Preventative Programs & Strategies, Emergency Preparedness, Weather & Operational Strategies: Community events, PSPS Support, outreach & recovery - operational activities	\$ 961,764.42

PNM – WMP 2026

	TOTAL	\$	3,308,025.92
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# Attachment 2

PNM Public Safety Power Shutoff Plan



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# TABLE OF CONTENTS

- 1. Introduction and Scope..... 1
  - 1.1. Changes from the 2025 PSPS Plan..... 2
- 2. High Fire Risk Areas (HFRAs) ..... 3
- 3. Public Safety Power Shutoff (PSPS) Overview..... 5
  - 3.1. PSPS Decision-Making Process Overview ..... 5
    - 3.1.1. PSPS Phases..... 5
      - 3.1.1.1. Awareness ..... 6
      - 3.1.1.2. Evaluation ..... 6
      - 3.1.1.3. Mobilization ..... 7
      - 3.1.1.4. De-Energization ..... 7
      - 3.1.1.5. Restoration ..... 9
      - 3.1.1.6. After Action Review (AAR) ..... 11
    - 3.2. PNM’s PSPS Event Organization..... 11
      - 3.2.1. Command and Control ..... 11
      - 3.2.2. PNM PSPS Staffing ..... 11
- 4. Use of Situational Awareness (SA) ..... 13
  - 4.1. Collaborations..... 13
  - 4.2. Tools..... 13
    - 4.2.1. AiDash ..... 13
    - 4.2.2. Firescape ..... 14
    - 4.2.3. Pyregence..... 15
    - 4.2.4. CloudFire ..... 15
    - 4.2.5. Composite Risk Index (CRI)..... 16
    - 4.2.6. Weather Modeling ..... 17
    - 4.2.7. Indji Watch ..... 17
  - 4.3. Thresholds and Burning Conditions..... 19
    - 4.3.1. Red Flag Warnings (RFWs)..... 19
  - 4.4. Real-Time Observations..... 21
    - 4.4.1. Weather..... 21

- 4.4.2. Ignition Detection Cameras..... 22
- 4.5. Other Non-Weather Factors ..... 23
- 5. PSPS Communications Overview ..... 24
  - 5.1. PSPS Communications ..... 25
    - 5.1.1. Communications During Non-PSPS Conditions..... 25
    - 5.1.2. Communications During Potential PSPS Conditions..... 28
      - 5.1.2.1. ADVISORY..... 30
      - 5.1.2.2. WATCH ..... 30
      - 5.1.2.3. WARNING..... 31
      - 5.1.2.4. Weathering the Storm ..... 31
      - 5.1.2.5. Inspection Patrol..... 32
      - 5.1.2.6. Inspection Patrol Completed ..... 32
      - 5.1.2.7. PSPS: Power Has Been Restored..... 33
      - 5.1.2.8. All Customers Restored ..... 33
  - 5.2. Customer Support via Contact Center ..... 34
  - 5.3. Regulatory and Governmental Coordination..... 34
  - 5.4. Tribal Engagement Coordination ..... 35
  - 5.5. Large Managed Accounts Coordination..... 37
  - 5.6. Community Support and Coordination ..... 37
  - 5.7. Educational Outreach ..... 37
  - 5.8. Community Engagement, Feedback, and Training ..... 37
- 6. Next Steps ..... 40

# LIST OF FIGURES

Figure 1. PNM HFRA and Fire Weather Zones with USFS Boundaries..... 4

Figure 2. Map of Current PSPS Alert Statuses in HFRA..... 8

Figure 3. PSPS Status Legend ..... 8

Figure 4. PNM’s PSPS Roles ..... 12

Figure 5. AiDash Snapshot ..... 13

Figure 6. Firescape’s Platform and Risk Score ..... 14

Figure 7. PyreCast Fire Forecasting ..... 15

Figure 8. CRI Seven-Day Forecast ..... 16

Figure 9. Daily Fire Operating Conditions Report Sample ..... 18

Figure 10. 14-Day Indji Watch Forecast Sample – Bosque MET Station ..... 19

Figure 11. Forecast Zone Alerts Map ..... 20

Figure 12. Tempest Dashboard ..... 21

Figure 13. General PSPS Awareness Infographics ..... 28

Figure 14. Example Flow of Notifications and Outreach by PNM’s CMR Team ..... 34

Figure 15. PNM HFRA with Tribal Boundaries ..... 36

# LIST OF TABLES

Table 1. PSPS Changelog (By Year) ..... 2

Table 2. PSPS Phases ..... 6

Table 3. Short- and Long-Range Weather Models ..... 17

Table 4. PSPS Phases and Communications Stages Alignment ..... 24

Table 5. General PSPS Awareness Messaging ..... 26

Table 6. PSPS Communications Messaging Stage: ADVISORY ..... 30

Table 7. PSPS Communications Messaging Stage: WATCH..... 30

Table 8. PSPS Communications Messaging Stage: WARNING ..... 31

Table 9. PSPS Communications Messaging Stage: Weathering the Storm ..... 31

Table 10. PSPS Communications Messaging Stage: Inspection Patrol ..... 32

Table 11. PSPS Communications Messaging Stage: Inspection Patrol Completed ..... 32

Table 12. PSPS Communications Messaging Stage: PSPS Has Been Restored ..... 33

Table 13. PSPS Communications Messaging Stage: All Customers Restored..... 33

# LIST OF APPENDICES

APPENDIX A..... 42

    HIGH FIRE RISK AREA MAPS ..... 42

APPENDIX B..... 59

    PNM PSPS PLAN – TECHNICAL GLOSSARY..... 59

APPENDIX C..... 63

    PNM PSPS PLAN – ABOUT..... 63

APPENDIX D..... 66

    PNM PSPS PLAN – WILDFIRE MITIGATION VEGETATION MANAGEMENT AND INFRASTRUCTURE  
    MAINTENANCE EXPENSE 2025 ANNUAL REPORT..... 66

# ACRONYMS & ABBREVIATIONS

AAR	After Action Review
API	Application Programming Interface
CMR	Crisis Management and Resilience
CRI	Composite Risk Index
DOC	Distribution Operations Center
EOC	Emergency Operations Center
ECMWF	European Centre for Medium-Range Weather Forecasts
EMNRD	Energy, Minerals and Natural Resources Department
FEMA	Federal Emergency Management Agency
FWZ	Fire Weather Zone
GIS	Geographic Information System
GFS	Global Forecast System
HFRA	High Fire Risk Area
HRRR	High-Resolution Rapid Refresh
IC	Incident Commander
NAM	North American Mesoscale Model
NFDRS	National Fire Danger Rating System
NMDOH	New Mexico Department of Health
NMDHSEM	New Mexico Department of Homeland Security and Emergency Management
NM Ops	New Mexico Operations
NMPRC	New Mexico Public Regulation Commission
NWS	National Weather Service
OMS	Outage Management System
PIO	Public Information Officer
PNM	Public Service Company of New Mexico

PNM – PSPS 2026

PSPS	Public Safety Power Shutoff
PWOP	Power Operations
RFW	Red Flag Warning
SA	Situational Awareness
SMS	Short Message Service
SVP	Senior Vice President
SWS	Special Weather Statement
T&D	Transmission and Distribution
UAS	Unmanned Aircraft System
USFS	United States Forest Service
VM	Vegetation Management
WHP	Wildfire Hazard Potential
WMP	Wildfire Mitigation Plan

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## 1. Introduction and Scope

This PNM Power Safety Power Shutoff (PSPS) Plan (hereafter referred to as “the PSPS Plan”) identifies the relevant considerations, process flow, and implementation protocol before, during, and after a PSPS event. The PSPS Plan describes the necessary planning steps, internal and external communications, and personnel readiness needed for the successful implementation of a proactive PSPS event. The PSPS Plan does not remove or replace existing field and operations authority or responsibility to de-energize systems or circuits consistent with evolving events or safety concerns.

A vital component in developing the PSPS Plan has been ongoing community input. PNM continues conversations with local, state, federal, Tribal and Pueblo communities located within the High Fire Risk Areas (HFRAs) (as defined in **Section 2** and **Appendix A**) to obtain input from first responders, emergency management personnel, local and state government, Tribal officials, and other stakeholders. The community outreach sessions provided an opportunity for open and constructive dialogue about PNM’s wildfire mitigation efforts.

Community perspectives and suggestions are crucial as PNM balances public safety with the impact it has on customers and communities. As discussed at each public meeting, PNM expects to continue collaborating with potentially affected communities.

The PSPS Plan is not intended to be aspirational, nor to address yet-to-be initiated projects or activities. Any forward-looking statements are not a guarantee of future performance or project initiation. Statements and details in PNM’s PSPS Plan are current as of its writing in Q1 2026.

### 1.1. Changes from the 2025 PSPS Plan

**Table 1. PSPS Changelog (By Year)**

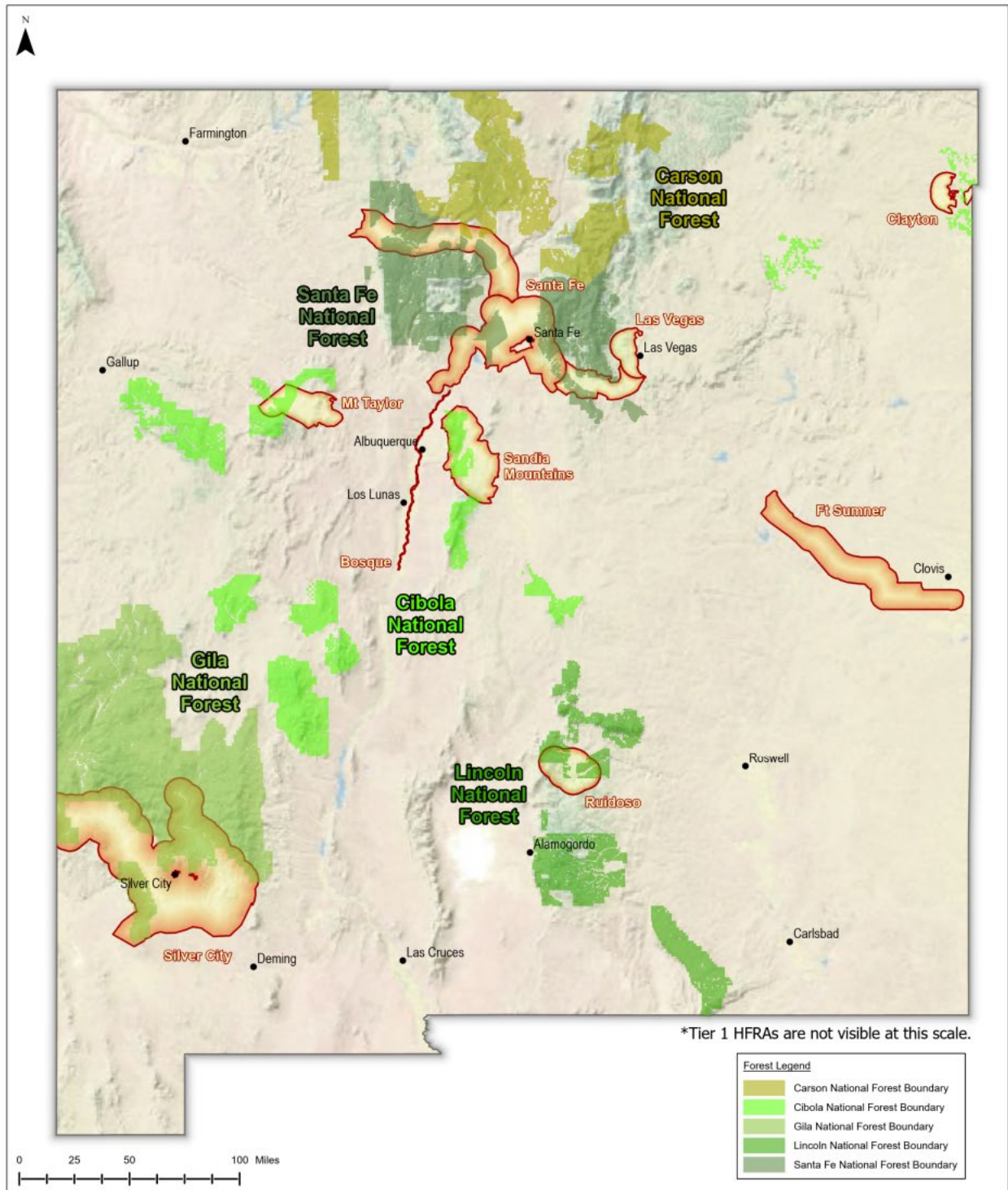
<b>PSPS Version [Year]</b>	<b>Original Content / Reference</b>	<b>Changed [Year]</b>	<b>Revised Content</b>	<b>Justification</b>	<b>Approved By <i>*Overall approval granted by PNM SVP-NM Ops</i></b>
<b>2025</b>	No changelog in PSPS	2026	Changelog introduced and data will be maintained and revised annually	Year-to-year changes are made easier for readers to view at a glance.	Wildfire Dept.
<b>2025</b>	Sandia Heights HFRA boundary	2026	Sandia Heights HFRA boundary revised	Landscape does not present high fire risk in PNM’s service territory. Athena and Wildfire Hazard Potential (WHP) dataset show low to moderate at low resolutions. Fire station in proximity to Paseo Del Norte. Urban infrastructure like streets, sidewalks, and walls deter fire spread.	GIS Wildfire Dept.
<b>2025</b>	Clayton HFRA	2026	Clayton West and East become ‘Clayton’ as Clayton East is removed	Clayton East inclusion is an artifact and has NO asset infrastructure to consider in risk assessment.	GIS Wildfire Dept.
<b>2025</b>	No document approval captured by signature line	2026	Document approval signature line added	Additional transparency and ownership-approval of document.	Wildfire Dept.
<b>2025</b>	Not included: NMPRC financial filing for Wildfire and Vegetation spending	2026	Financial filing to be included in the PSPS (annual filing)	The NMPRC financial filing of wildfire and vegetation spend is filed separately in January.	Wildfire Dept.

## 2. High Fire Risk Areas (HFRA)

PNM's Wildfire Mitigation Plan (WMP) identifies HFRA within its service territory where the likelihood and potential impacts of wildfire are elevated. These areas are defined by a combination of factors, including flammable wildland vegetation, terrain, weather patterns, population density, and proximity to values at risk.

Across New Mexico, PNM identified 11 HFRA, and further designated areas of lower (Tier 1) and higher (Tier 2) risk. Tier 1 areas are generally more urbanized and have less contiguous flammable vegetation, while Tier 2 areas present higher wildfire potential due to environmental conditions such as dense, continuous fuels, limited access, and steep terrain. Currently, PNM has 11 – Tier 2 areas and four Tier 1 areas in HFRA. See HFRA mapping in Appendix A. PNM applies these tiered classifications to prioritize and guide its wildfire mitigation projects and operational strategies.

**Figure 1. PNM HFRAs and Fire Weather Zones with USFS Boundaries**



**PNM HFRAs with USFS National Forest Boundaries**

2025

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### 3. Public Safety Power Shutoff (PSPS) Overview

The PSPS Plan is designed to proactively de-energize electrical facilities in PNM’s identified areas of extreme wildfire risk to reduce the potential for those electrical facilities to become wildfire ignition sources or contribute to the spread of wildfires. Based on the inherently disruptive nature of power outages, PSPS events must be carefully coordinated to balance wildfire risk with potential PSPS impacts on PNM customers, stakeholders, and the communities PNM serves.

The unpredictable nature of wildfire and weather patterns creates significant challenges with forecasting PSPS events. Real-time evaluations and decision-making are critical in making PSPS determinations, and, depending on the associated wildfire risk, those determinations may result in:

- De-energization in anticipated or unanticipated areas, and/or areas that extend beyond HFRA.
- No PSPS (de-energization) implemented.
- PNM identifies operational practices specific to its HFRA (see **Figure 1**). The PSPS Plan describes the coordination and processes, including operational and communication protocols, for implementation in these HFRA. PNM will initiate a PSPS in designated HFRA. However, there are some cases where feeders extend beyond the HFRA boundaries, which could impact customers outside the HFRA boundary.

A PSPS is considered when weather and other risk factors combine and fire potential exceeds thresholds that could indicate an extreme safety risk to customers and communities within designated HFRA. Environmental conditions that can increase the risk of utility-caused ignitions and wildfires include wind, temperature, humidity, combustible fuel, and fuel moisture content. The PSPS Plan also covers how PNM will communicate internally and externally as the PSPS Plan is implemented.

#### 3.1. PSPS Decision-Making Process Overview

The effective execution of a PSPS event requires close coordination of planning assumptions, external notifications, decision-making, and status updates by balancing public safety with the impact a PSPS may have on customers and communities.

PNM’s PSPS decision-making process is iterative and aligns with weather forecast updates. Each forecast cycle informs changes/updates for the area of concern, risk level, isolation and restoration plans, and potentially impacted stakeholders.

##### 3.1.1. PSPS Phases

The PSPS decision-making process will be initiated when PNM determines that a combination of critical conditions indicates the PNM system in HFRA locations is at extreme risk of becoming an ignition source, and that the forecasted conditions are severe enough to enable the rapid growth and spread of wildfire.

**Table 2. PSPS Phases**

PHASE	DAYS FROM PSPS EVENT	PHASE PURPOSE
Awareness	7	To monitor the conditions for a potential PSPS event and determine if the EOC should be activated.
Evaluation	6-4	To activate the EOC and prepare plans for a PSPS event.
Mobilization	3-0	For each team/group to execute the actions necessary to get all resources in position to execute the prepared PSPS plans.
De-Energization / Monitoring weather for safe conditions to begin re-energizing	Day of	To enact isolation and de-energization and transition to the restoration command structure.
Restoration	Once weather event subsides	To monitor for weather conditions that all for power restoration, tracking damage, and providing stakeholder updates.
After Action Review (AAR)	After restoration is complete	To review lessons learned during the PSPS event and assess how things can be done better during the next PSPS event.

### 3.1.1.1. Awareness

The Awareness Phase begins when forecast conditions indicate the potential for elevated wildfire risk that may warrant consideration of a PSPS. During this phase, the utility increases monitoring of weather, fire danger indices, and situational awareness tools to identify areas of concern. Internal teams are placed on heightened alert, communication pathways are readied, and preliminary notifications may be issued to stakeholders, regulators, and first responders. The primary objective of this phase is to ensure that all parties are aware of the emerging conditions and prepared for potential escalation.

### 3.1.1.2. Evaluation

PNM moves into the Evaluation Phase when weather conditions meet or exceed criteria to activate the Emergency Operations Center (EOC) for PSPS decision-making and coordination. The primary criteria utilized for moving into the evaluation phase is driven primarily by the Composite Risk Index (CRI), which is further described in **Section 4.2.5**.

At the beginning of the Evaluation Phase, PNM’s Crisis Management and Resilience (CMR) group will identify or appoint a Crisis Commander and notify internal PSPS groups that the EOC has been activated. Currently, PNM initiates the staffing of an incident organization, referred to as “Event Organization” (as described in **Section 3.2**).

The Evaluation Phase is focused on preparing plans for a PSPS event and de-energization. PNM assesses the situation to determine the resources needed to reduce impact and expedite restoration (the Restoration Phase is covered in more detail in **Section 3.1.1.5**).

### 3.1.1.3. Mobilization

The Mobilization Phase focuses on getting all the resources ready and in position to execute the plans made during Evaluation.

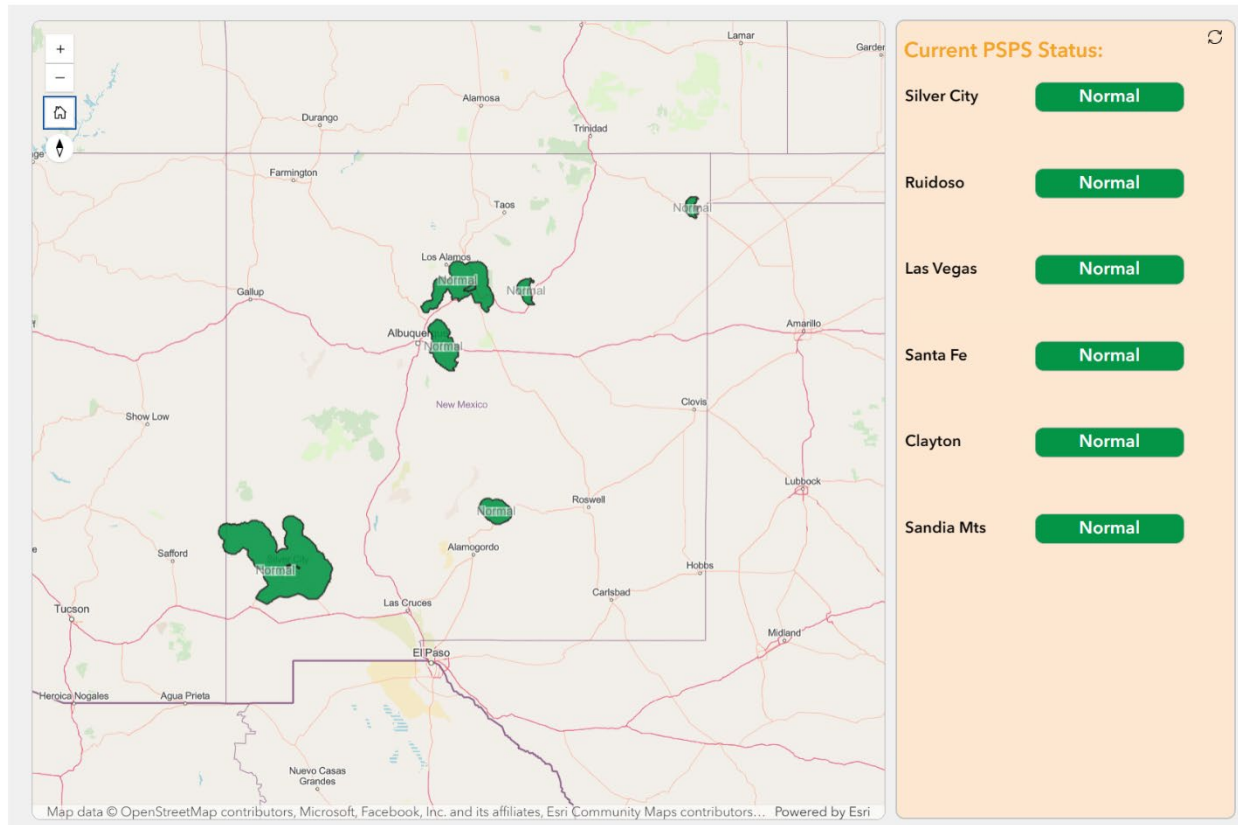
PNM’s CMR team will hold regular briefings during which PNM’s PSPS teams will discuss forecasts and coordinate planning assumptions, team actions, decision-making, preparations for possible de-energization, as well as begin planning for restoration.

### 3.1.1.4. De-Energization

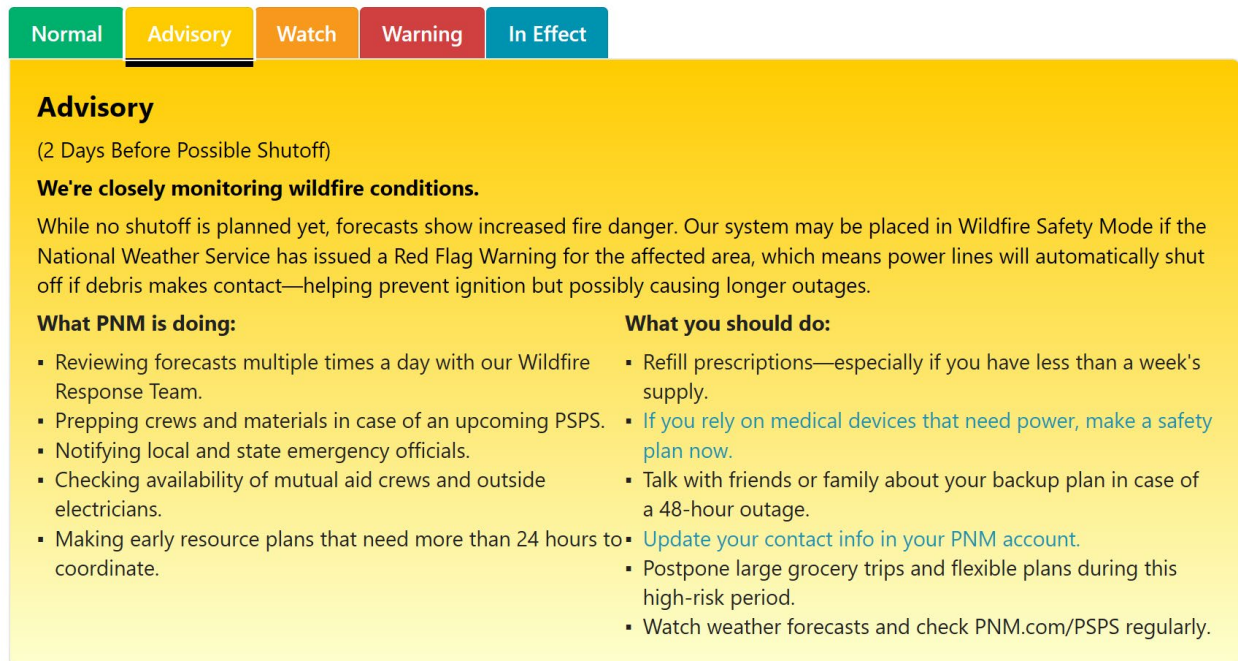
The next phase is De-Energization. As forecast conditions approach and near the point that de-energization may be necessary, a recommendation to de-energize will be made in the formal EOC setting and communicated to the Senior Vice President (SVP) of New Mexico Operations (NM Ops) or designee, who will issue the final order to de-energize service in the PSPS area.

The process of shutting off power may not occur all at once. Potential PSPS notifications will be sent to update customers and community members in advance of potential events, and may convey that the decision to implement a PSPS will be made quickly and without additional notice. The [PNM.com/PSPS](https://www.pnm.com/PSPS) website is updated in near real-time to reflect PSPS decisions and current conditions in HFRAs. See **Figure 2** for a snapshot of the live site and **Figure 3** for a snapshot of one of the map’s legend tabs, which includes status timeframes.

**Figure 2. Map of Current PSPS Alert Statuses in HFRAs**



**Figure 3. PSPS Status Legend**



When power is shut off for a PSPS, PNM recognizes that some communication channels may not be available due to the outages. However, PNM leverages a variety of communication methods to keep customers informed; once a PSPS is enacted and power is shut off, PNM will continue to communicate with customers and emergency responders through the available channels.

For instance, while PNM works with local media outlets to distribute information, there are some cases when radio equipment availability may also be subject to the PSPS. In that case, PNM will seek to identify the best methods of communicating with the local community during a PSPS, including notification to telecommunications providers and identification of the potential for “cellular on wheels” (COWs) capabilities in the area. Information will also be provided at the Community Resource Center (CRC) so that customers visiting one of these centers during a PSPS can have access to updated information regarding the PSPS estimated duration and restoration times.

#### 3.1.1.5. Restoration

The power will remain off while high-risk weather continues. This prevents potential ignitions that could occur from airborne debris hitting lines, vegetation contacts with power lines, or line slap (lines slapping together). When the weather risk passes, PNM will enter the Restoration Phase. Before power is turned back on, a thorough inspection of potentially affected lines and equipment must be completed.

Restoration is influenced by line inspections, damage assessments, and damage repairs. The commitment to minimizing restoration times begins in the Evaluation and Mobilization Phases, and inspections will start as soon as the weather risk has passed. Communication with customers, stakeholders, and community leaders will continue throughout this phase, sharing the status of restoration efforts and providing updated estimates of time remaining to complete restoration.

In the Restoration Phase, PNM will ask the community to help by:

- Allowing crews (PNM or contractor) access to customers’ properties for inspections and repairs.
- Keeping access roads clear and securing pets.
- Reporting visible damage through our customer service center (888-DIAL-PNM) while staying away from any damaged equipment. (Always consider power equipment to be energized.)
- Allowing drones or helicopters to inspect power lines without interference.

- Avoiding unsafe generator connections that could endanger repair workers or the community. If a customer has a generator cutover switch, PNM asks that customers please use it. If a customer does not have one, PNM will ask that customers **do not** wire generators directly into their electrical panel as *this could be dangerous for line crews*.

The CMR Team will coordinate inputs for a decision to begin restoration efforts. PNM will consider weather station-reported weather conditions and forecast trends, as well as consulting with fire agencies and community partners to help guide the decision to begin restoration efforts. The decision will consider wind, if weather and fire conditions have subsided to the point when PNM electric assets are not likely to cause consequential wildfire ignition, and conditions are safe to begin inspections.

Once the decision has been made to begin restoration efforts, a series of events takes place:

- Circuits are patrolled and inspected by PNM crews and contractors usually from the sub-station along the feeder, restoring sections of each feeder as inspections are complete.
- Customers on the restored section will receive outage updates, and customers on the un-restored section may receive updates to their estimated restoration time.
- All circuits within HFRA are patrolled to look for damage or other anomalies that might lead to failure and arcing upon re-energization:
  - Damage is assessed and documented.
  - Estimates of damage repairs are collected, shared, and used to refine restoration prioritization.
  - Damage is repaired.
  - Completed repair work is documented and communicated to Distributions Operation Center (DOC) or Power Operations (PWOP) appropriately.

Discovery of damage may impact restoration priorities. For instance, a high-priority circuit for restoration might not be restored first because damage must be repaired before power can be brought to the priority circuit. Other lower-priority circuits might be restored first as repairs are made to higher-priority circuits.

Circuits are finally re-energized in accordance with PNM standards and existing operating procedures.

#### 3.1.1.6. After Action Review (AAR)

PNM's Wildfire Group will conduct AARs after each PSPS event to capture lessons learned. It will evaluate operational performance, assess communication effectiveness, gather stakeholder feedback, and identify opportunities for improvement to enhance future PSPS planning and execution.

### 3.2. PNM's PSPS Event Organization

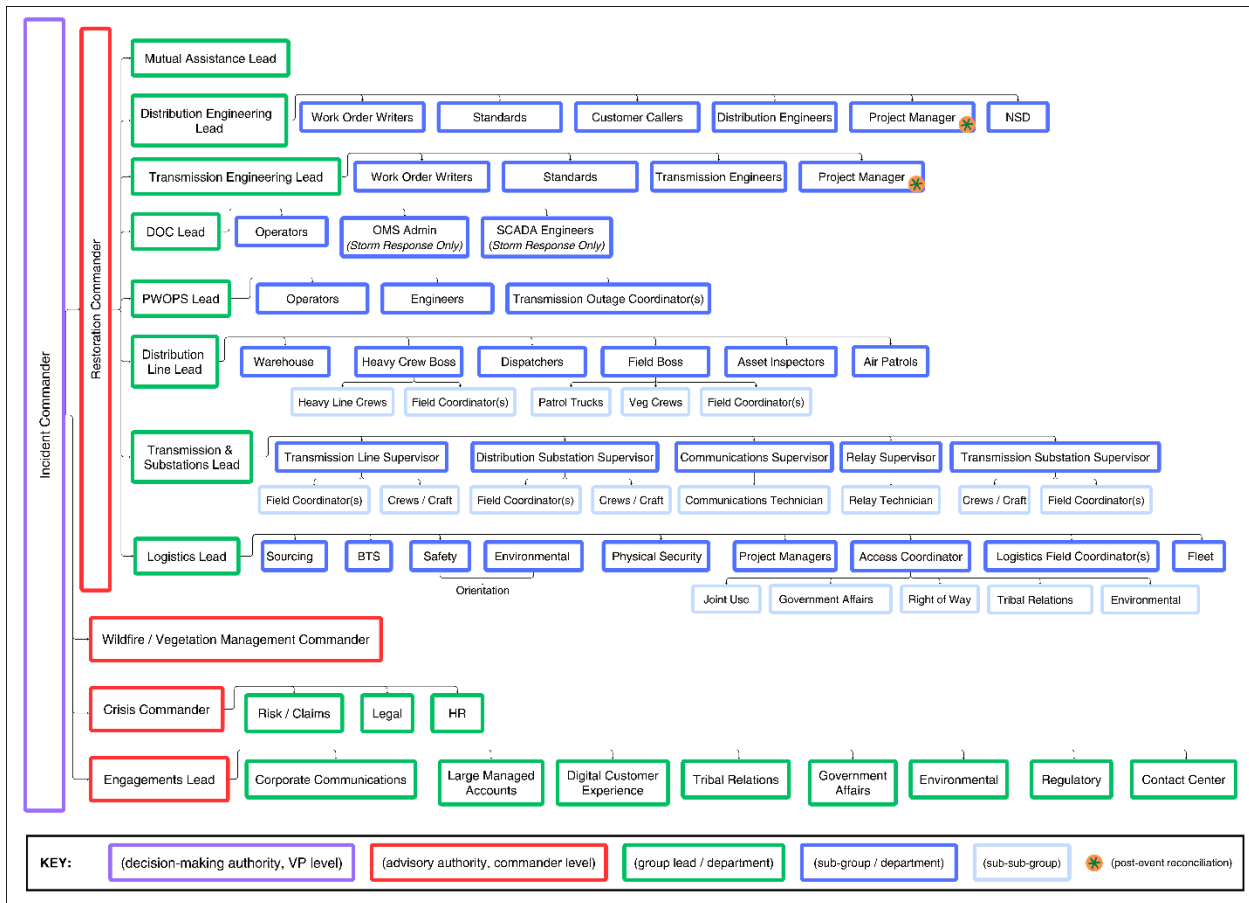
#### 3.2.1. Command and Control

For optimum restoration effectiveness to PNM customers, direction and control of all electric delivery restoration-related activities are centralized during a PSPS event. The PNM Incident Commander (IC) reports directly to the VP of Operations and the SVP of NM Ops for all PSPS events. DOC and PWOP keep local Operations informed on the status of system equipment affecting the event area.

#### 3.2.2. PNM PSPS Staffing

An EOC will be opened, either physically or virtually, and an incident command structure will be set up for the event under the direction of PNM's CMR group. **Figure 4** outlines the roles typically involved during a PSPS event.

Figure 4. PNM’s PSPS Roles



KEY: (decision-making authority, VP level) (advisory authority, commander level) (group lead / department) (sub-group / department) (sub-sub-group) (post-event reconciliation)

## 4. Use of Situational Awareness (SA)

PNM leverages multiple meteorological consulting firms to provide weather monitoring services, technology solutions, and tailored forecast reports for HFRAs and potential PSPS areas. These reports support PNM personnel in tracking evolving conditions and preparing for potential PSPS implementation. Each consulting partner delivers unique insights that strengthen decision-making.

### 4.1. Collaborations

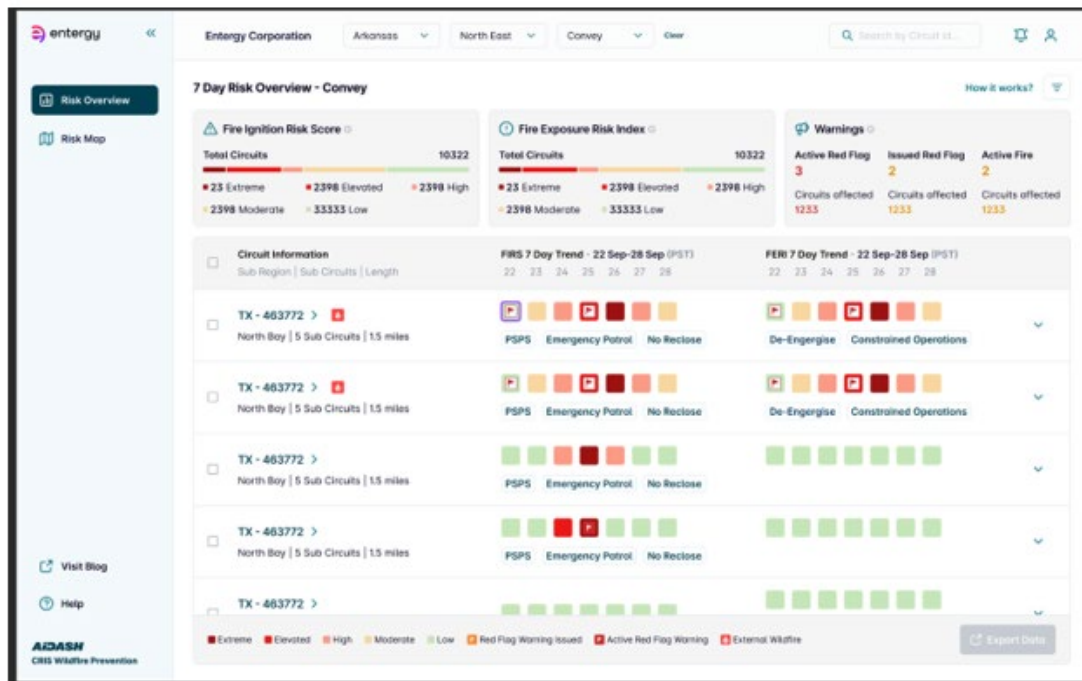
- **Sandia National Lab:** PNM and the Sandia Lab collaborate on technology and capabilities on multiple research opportunities, some of which are utilized in the development of the WMP and the PSPS Plan.
- **Academia:** Sonoma Technologies provides access to consulting meteorologists. PNM uses this service during its PSPS decision-making process.

### 4.2. Tools

#### 4.2.1. AiDash

Provides a seven-day, forward-looking weather and fire-danger forecast at the region, circuit, and sub-circuit levels. The platform integrates 10 years of historical fire-weather and vegetation data to produce localized operational insights and mitigation recommendations. PNM configures settings that automatically trigger proactive mitigative actions.

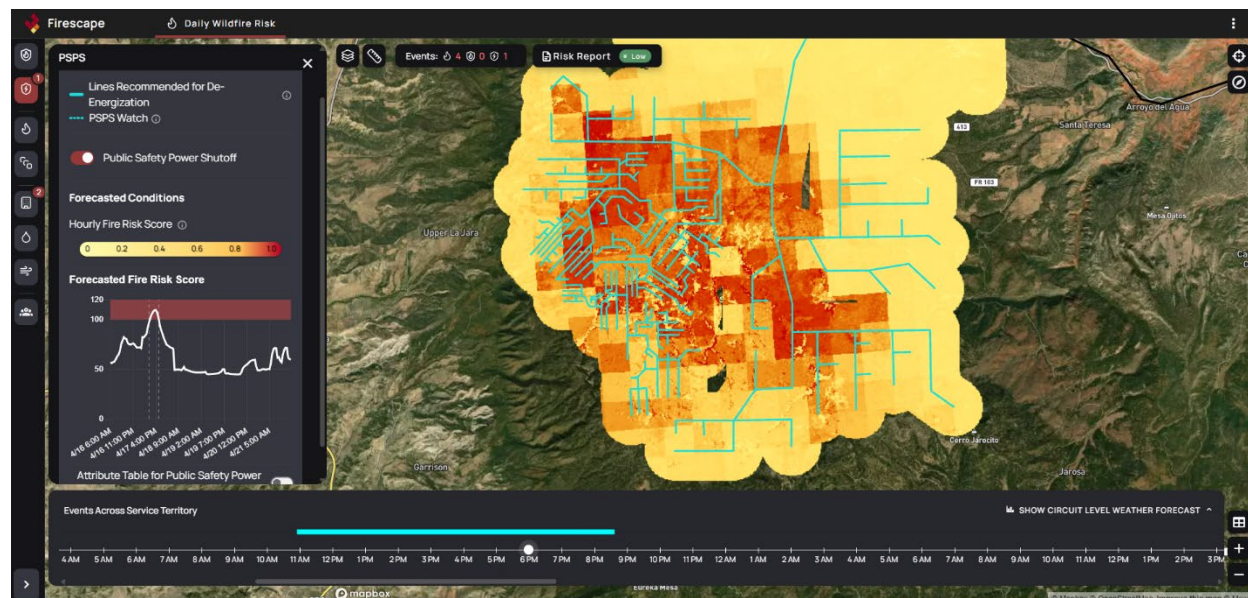
**Figure 5. AiDash Snapshot**



### 4.2.2. Firescape

Firescape provides ignition and spread probability, along with high-consequence wildfire risk modeling, to automatically recommend specific mitigation actions such as non-reclose or PSPS. Risk scores have a seven-day forecast and are updated hourly. The risk modeling tool provides granular weather and system insights at the line segment and feeder level. The tool's risk score is based on a 10-year history of climatology and fire behavior. Thresholds are set with PNM to determine when alerts are triggered for a potential PSPS. The risk score uses satellite imagery to assess fuel characteristics, such as fuel moisture, and forecasted weather data, such as granular wind speed and relative humidity. This information is used to drive wildfire simulations for consequence modeling. The tool is in ongoing product development and refinement and is in Beta testing. **Figure 6** uses synthetic data as an example.

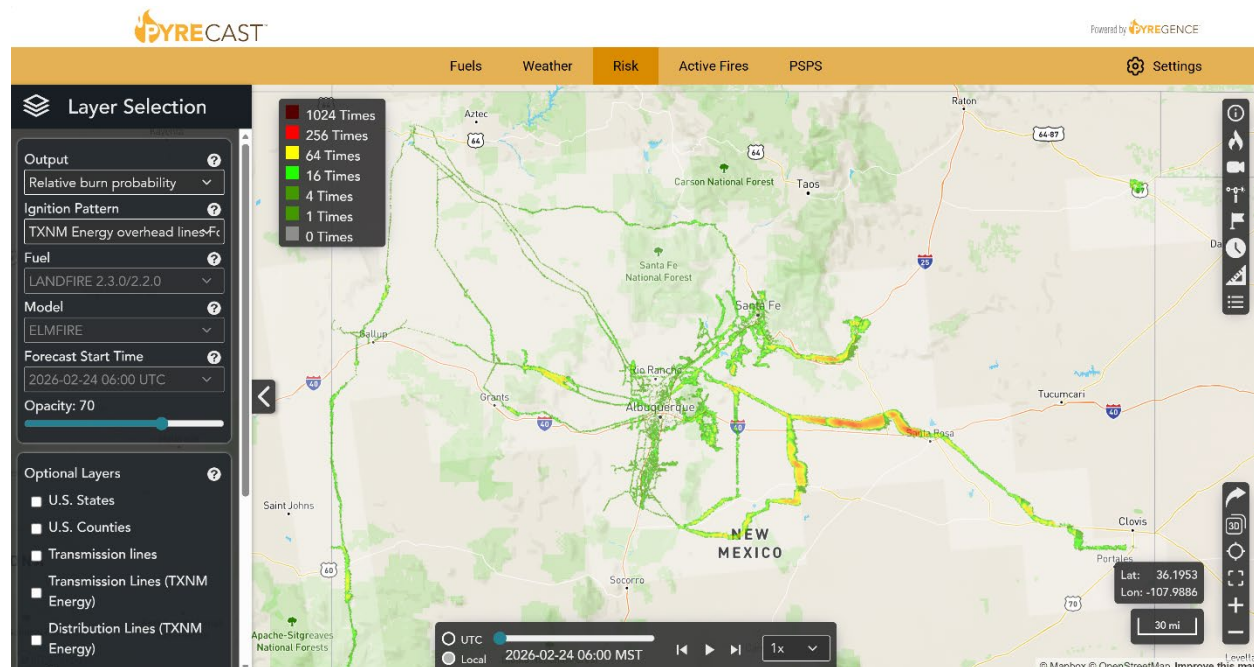
**Figure 6. Firescape's Platform and Risk Score**



### 4.2.3. Pyregence

The PyreCast model is an easy-to-use near-term fire forecasting decision support tool that leverages efficient software programming practices and the best available fire science and allows users to visualize data from multiple wildfire-related forecasts. **Figure 7** shows how wind forecasts can be displayed for use in decision making.

**Figure 7. PyreCast Fire Forecasting**



### 4.2.4. CloudFire

CloudFire is a subscription-based service that delivers fire danger indices at a sub-HFRA scale. It integrates historical climatology—including wind, humidity, fire occurrence, and fuel moisture data—to produce updated fire danger forecasts and indices every six hours. These data-driven forecasts enhance situational awareness and support proactive wildfire mitigation planning.

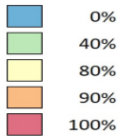
### 4.2.5. Composite Risk Index (CRI)

The CRI leverages wind and fire behavior data to forecast wildfire risk associated with powerlines. CRI supports operational decision-making by providing a seven-day risk forecast with thresholds customized to utility infrastructure, historically high fire risk areas, and their unique climatological and fuel characteristics. Forecasts are generated from multiple weather models that refresh every six hours, ensuring continuously updated insight into potential ignition and consequence conditions.

**Figure 8. CRI Seven-Day Forecast**

**PNM Percent of CRI Threshold Forecast for 11/18/25 - 11/24/25**

Zone	Nov 18	Nov 19	Nov 20	Nov 21	Nov 22	Nov 23	Nov 24
<a href="#">Bosque</a>	4	3	1	1	4	1	1
<a href="#">Clayton West</a>	5	12	1	3	4	1	0
<a href="#">Fort Sumner 3</a>	4	3	0	2	2	0	0
<a href="#">Las Vegas</a>	8	8	3	5	6	2	0
<a href="#">Mt. Taylor</a>	2	1	0	1	1	1	0
<a href="#">Ruidoso</a>	2	3	0	2	3	0	0
<a href="#">Sandia Mts</a>	4	1	1	3	3	2	1
<a href="#">Santa Fe</a>	4	4	0	9	2	2	1
<a href="#">Santa Fe East</a>	3	1	0	3	1	1	0
<a href="#">Santa Fe North</a>	2	5	0	2	2	2	1
<a href="#">Silver City</a>	1	0	1	0	1	0	1



- 0%
- 40%
- 80%
- 90%
- 100%

### 4.2.6. Weather Modeling

Weather conditions are dynamic and forecast accuracy improves as an event approaches. Variability in forecast precision reflects both evolving atmospheric conditions and the characteristics of the models used. To generate the CRI, four complementary weather forecast models are applied—two short-range and two long-range—providing a balance of immediacy and extended situational awareness.

**Table 3. Short- and Long-Range Weather Models**

Short-Range Weather Models		Long-Range Weather Models	
<b>High-Resolution Rapid Refresh (HRRR)</b>	Provides accurate forecasts up to 48 hours ahead.	<b>Global Forecast System (GFS)</b>	Extends forecasts up to eight days.
<b>North American Mesoscale Model Nest (NAM)</b>	Provides reliable forecasts up to 60 hours ahead.	<b>European Centre for Medium-Range Weather Forecasts (ECMWF HIRES)</b>	Provides detailed global forecasts up to eight days ahead.

The narrower the forecast scope, the more accurate the weather prediction is. A 10-day forecast is only accurate about 50% of the time, while a seven-day forecast can accurately predict the weather about 80% of the time. In contrast, a five-day forecast can provide accurate weather predictions about 90% of the time.<sup>1</sup>

### 4.2.7. Indji Watch

Indji Watch is a tool that provides natural hazard alerting services to PNM. It is a situational awareness tool that combines a Threat Level which lists National Weather Service (NWS) Special Weather Statements (SWS) and a dashboard with map-based visualizations of the same SWS. Indji Watch has decades of experience derived from wildland fire control and utility Situational Awareness (SA) development.

Indji Watch ingests PNM asset data and uses a Geographic Information System (GIS) as a basis for its service. When SWS affecting PNM assets or operating areas are issued by the NWS, Indji Watch populates the Threat Level and map dashboard.

<sup>1</sup> <https://www.nesdis.noaa.gov/about/k-12-education/weather-forecasting/how-reliable-are-weather-forecasts>

PNM receives a Daily Fire Operating Conditions Report (see **Figure 9**) prepared by Indji Watch. The Report is emailed to a distribution list of PNM personnel and assigns an Operating Condition of Normal, Elevated, or Extreme to each PNM HFRA based on indices derived from the National Fire Danger Rating System. This publicly available data is the same data that is used by federal and other wildland firefighting agencies to make such fire business decisions as setting dispatch levels, staffing levels, and determining area closures. PNM uses the data to inform field operations work practices.

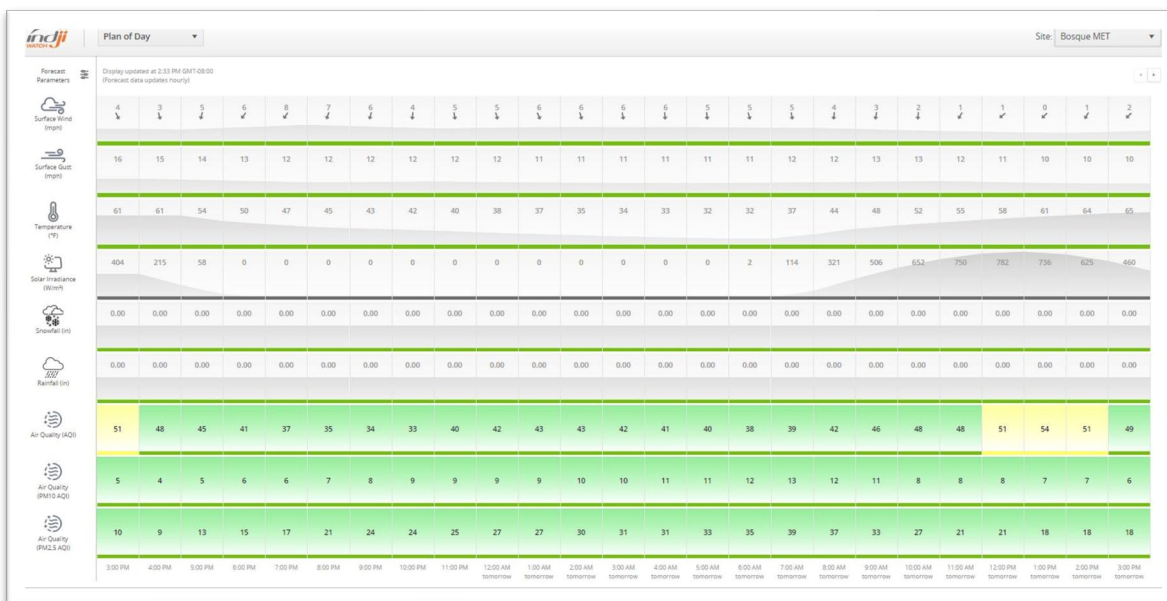
**Figure 9. Daily Fire Operating Conditions Report Sample**

Operating Condition Areas	Tuesday Sep 30	Wednesday Oct 01	Thursday Oct 02	Friday Oct 03	Saturday Oct 04
Bosque	Elevated	Elevated	Elevated	Elevated	Elevated
Clayton West	Elevated	Normal	Elevated	Elevated	Elevated
Fort Sumner 3	Elevated	Normal	Elevated	Elevated	Elevated
Las Vegas	Normal	Elevated	Elevated	Elevated	Elevated
Mt. Taylor	Normal	Normal	Elevated	Elevated	Elevated
Ruidoso	Normal	Normal	Normal	Elevated	Elevated
Sandia Mts	Normal	Normal	Elevated	Elevated	Elevated
Santa Fe	Normal	Normal	Elevated	Elevated	Elevated
Santa Fe East	Normal	Elevated	Elevated	Elevated	Elevated
Santa Fe North	Elevated	Elevated	Elevated	Elevated	Elevated
Silver City	Normal	Normal	Elevated	Elevated	Elevated

Specific to utility SA, PNM employees can log into the Indji Watch dashboard and view Red Flag Warnings (RFW) and any other selected SWS alerts such as high winds, etc. PNM receives emailed RFW alerts from Indji Watch and has created tools to forward them to affected field and system operations personnel via phone, emails, and/or texts.

PNM has access to customized 14-day weather forecasts at specified locations. Within its Forecast Dashboards, the company can view long-range alerts when wind speeds or other weather variables approach pre-set thresholds (see **Figure 10**). These forecasts provide early insights that can inform the initiation of the PSPS decision-making process. To ensure timely awareness, automated email or SMS notifications are issued up to 48 hours in advance when sustained winds or gusts are forecasted to exceed established thresholds, prompting broader attention and operational readiness.

**Figure 10. 14-Day Indji Watch Forecast Sample – Bosque MET Station**



### 4.3. Thresholds and Burning Conditions

During the lead up to PSPS, monitoring and awareness are continual, and evaluation continues when the minimum conditions are met. PNM contemplates operational mitigations and RFWs when environmental values combine to produce critical burning conditions.

#### 4.3.1. Red Flag Warnings (RFWs)

The NWS issues both RFW and Fire Weather Watch alerts. An RFW is often preceded by a Fire Weather Watch alert, which indicates critical fire-weather conditions could occur in the next 48 hours. An RFW is issued when critical fire-weather conditions could occur in the next 24 hours.<sup>2</sup>

An RFW alert informs the public, firefighters, and land management agencies when conditions are ideal for wildland fire ignition and dangerous fire spread.

An RFW does not necessarily mean a PSPS is imminent, nor is an RFW a requirement for the PSPS decision-making process to begin. That said, an RFW *is* likely to be both issued and in effect when the PSPS decision-making process is initiated.

The NWS has identified discreet Fire Weather Zones (FWZ) across the nation for providing fire weather alerts like RFWs. These zones are shown on the NWS’s Fire Weather interactive map.<sup>3</sup> NWS’s city webpages also provide a map snapshot of the active alerts in the local forecast zones, as shown in **Figure 11**.<sup>4</sup>

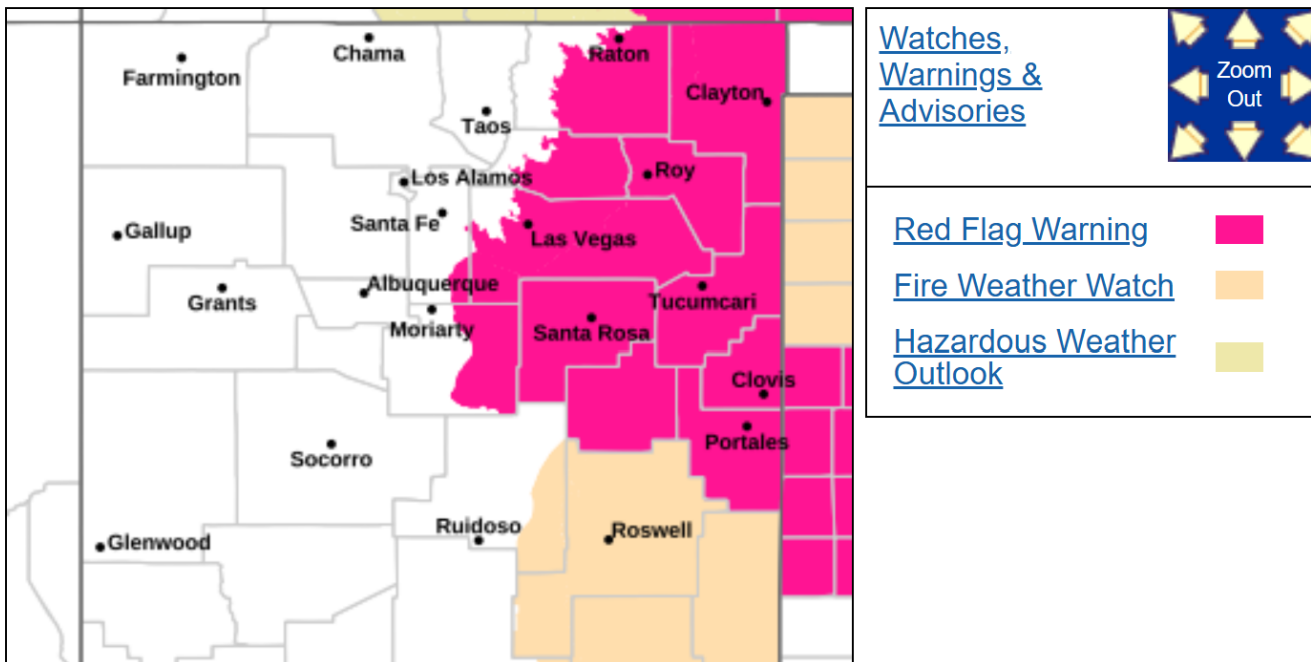
<sup>2</sup> [https://www.weather.gov/dtx/fire\\_defs](https://www.weather.gov/dtx/fire_defs)

<sup>3</sup> <https://www.weather.gov/wrh/fire>

<sup>4</sup> <https://www.weather.gov/abq/#:~:text=Click%20a%20location%20below%20for%20detailed%20forecast.>

**Figure 11. Forecast Zone Alerts Map**

Click a location below for detailed forecast.



**Last Map Update: Mon, Feb 23, 2026 at 12:58:02 pm MST**

There are three NWS forecasting offices that cover the PNM Service Area:

- ❖ Albuquerque, NM
- ❖ El Paso, TX
- ❖ Midland, TX

These forecasting offices only issue RFW when dry fuels and low relative humidity combine with gusty winds to create the potential for extreme wildfire conditions. The RFW thresholds used by most NWS offices are explained on the NWS's Fire Weather Criteria web page.<sup>5</sup>

<sup>5</sup> <https://www.weather.gov/git/firewxcriteria>

## 4.4. Real-Time Observations

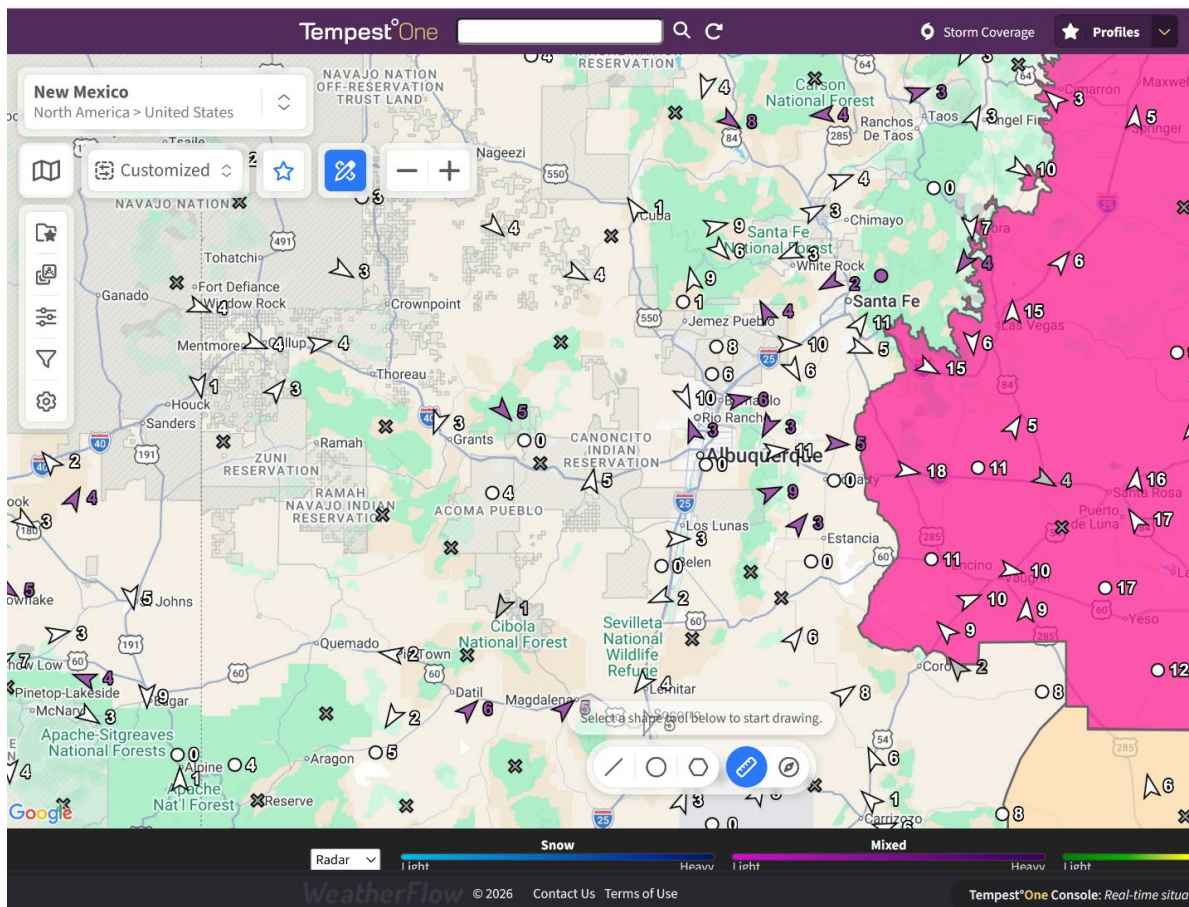
### 4.4.1. Weather

PNM relies on real-time weather observations collected from both publicly available and privately operated automated weather stations. Through the Tempest user interface, PNM has immediate access to high-quality public datasets as well as data from PNM-owned stations—critical for validating conditions that may trigger PSPS actions.

Location-specific data is especially important. By utilizing weather stations co-located with company assets, PNM gains direct insight into the environmental conditions experienced by infrastructure within HFRAs, including those in rugged or hard-to-access terrain.

In addition to Tempest, PNM also uses Indji Watch to enhance situational awareness by displaying substation-sited weather stations as interactive map layers. Each station can be queried on the map to view current observations in relation to nearby PNM assets. This capability is enabled through the integration of weather station data via an Application Programming Interface (API), ensuring that real-time conditions are readily available for operational decision-making.

**Figure 12. Tempest Dashboard**



**NOTE:** Tempest weather stations are shown as the purple arrows in the above image.

#### 4.4.2. Ignition Detection Cameras

PNM initiated a dual-pilot program with two different camera vendors to deploy utility-owned ignition detection cameras to support situational awareness. The cameras use 24/7 AI-assisted ignition detection that uses machine learning algorithms to scan for, and alert on, ignitions within its viewshed. These detections are further human-validated by the vendor and the camera vendor's automated alerts are made available to relevant fire, first responders, and Tribal partners within the cameras' viewshed, to support their situational awareness and relevant response activities.

This dual-pilot project includes eight cameras strategically installed across selected HFRA in Northern and Southern New Mexico. Location siting for these cameras was based on wildfire history, terrain, fuel continuity, and proximity to critical PNM assets. Each camera site provides high-resolution, real-time imagery designed to improve early ignition detection and enhance operational readiness.

If an ignition is detected, the contracted vendors review the information, and where applicable, notifications are made available by the vendor, to the area's first responders (including Tribes and Pueblos), fire, and forestry services.

This effort is part of a broader collaborative initiative with the Governor's Office, which is leading a statewide pilot project of wildfire-monitoring cameras. PNM is also working with the local branch of the NWS office and local government emergency managers to share video feed and ignition information.

This dual-pilot project supports a direct head-to-head comparison of the vendors, their services, and performance. PNM will use this information to help inform the next steps and may consider additional installations in the future.

Current PNM camera locations:

- ❖ Santa Fe 2
- ❖ Silver City 6

## 4.5. Other Non-Weather Factors

PNM routinely monitors a variety of factors including operational conditions of our systems and other incidents within our service areas, such as nearby fires or other emergencies. PNM is also working with communities to identify critical infrastructure in the HFRAs and understand other community issues that may be a factor in PSPS determination.

Critical facilities and critical infrastructure refers to facilities and infrastructure that, due to its function(s), could create a disruption of vital socioeconomic or public safety activities if its functionality is impaired. Identification of these facilities is coordinated in consultation with state and local emergency management personnel. Although this designation does not exclude a facility from consideration for a PSPS, it recognizes the facility may require enhanced coordination for outage preparedness, notification, and restoration prioritization, where feasible.

These facilities may include, but are not limited to, those associated with the Critical Infrastructure Sectors as defined by the Critical Infrastructure & Security Agency.<sup>6</sup> Examples of such facilities may include: hospitals, medical, skilled nursing, dialysis facilities or others providing life-sustaining treatment, emergency, police, fire, EMS stations, community centers, resource centers, evacuation centers or other facilities identified by emergency managers as essential to local emergency response plans, emergency operations centers, jails/prisons, radio and communication towers/facilities, water/wastewater treatment facilities, transportation facilities, airports/heliports, Emergency Feeding Organizations (7 USC 7501<sup>7</sup>), housing/resource shelters, and independent/senior living facilities.

PNM may also consider (where known) the availability of back-up generation at critical facilities affected by a potential PSPS and PNM's ongoing wildfire mitigation work.

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<sup>6</sup> <https://www.cisa.gov/topics/critical-infrastructure-security-and-resilience/critical-infrastructure-sectors>

<sup>7</sup> [https://uscode.house.gov/view.xhtml?req=\(title:7%20section:7501%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:7%20section:7501%20edition:prelim))

## 5. PSPS Communications Overview

The size of PNM’s service area, geographic and environmental diversity, and the unpredictable nature of New Mexico’s weather create challenging conditions for rapid PSPS communications.

While communications and engagement activities are executed before, during and after a potential PSPS event, actions are not directly tied to the operational stages. Instead, direct customer communication is defined by the number of days prior to a potential PSPS. **Table 4** demonstrates PNM’s Customer Communications PSPS stages as aligned with PSPS Phases.

**Table 4. PSPS Phases and Communications Stages Alignment**

PNM PSPS PHASE	DAYS FROM PSPS EVENT	COMMUNICATIONS TIMING SPECIFICATION	COMMUNICATIONS STAGE
Awareness	7	NA	No Action
Evaluation	6	NA	No Action
	5	NA	No Action
	4	NA	No Action
Mobilization	3	NA	No Action
	2	Within 2-day window	ADVISORY
De-Energization / Monitoring weather for safe conditions to begin re-energizing	1	By 3 P.M.	WATCH
	Day Of	By 9 A.M.	WARNING
Restoration	Once weather event subsides	As soon as possible following de-energization	Weathering the Storm
		When safe conditions allow line inspections to begin	Power Patrol
		After all crews have reported in with damage assessment and new ETR is available	Patrol Completed
After Action Review (AAR)	After restoration is complete	When customers affected by PSPS have been restored	PSPS Has Been Restored
		When all customers in an HFRA who experienced on outage, PSPS related or not, have been restored to best of PNM’s knowledge.	All Customers Restored

The PSPS Plan identifies critical stakeholders, actions, messaging, and communication channels to maximize PNM’s reach to customers and communities in the event of a PSPS and integrates the communications planning below.

When possible, PNM will notify customers and local communities before, during, and after a PSPS event. PNM recognizes that advanced and/or extensive PSPS communications may not be feasible or possible. PNM will use multiple communication methods to broadcast messaging on public safety while following operation protocols. Some of these tools include:

- Direct communication with customers before and throughout a PSPS, using customer contact information provided on their PNM accounts.
- Weather and potential PSPS alerts on [PNM.com](https://www.pnm.com) and the PNM Outage Map ([Outagemap.PNM.com](https://outagemap.pnm.com)).
- Customer Engagement supports external communications throughout potential events, as needed.
- PSPS Alert Status updates, wildfire preparedness and safety messaging on [PNM.com/PSPS](https://www.pnm.com/PSPS).
- Media engagement with local TV, print, and radio journalists.
- Social media.
- Coordination with state and local government emergency managers to assist them with community notification through their systems/platforms.
- Post-action briefings to modify communication practices, as necessary.

## 5.1. PSPS Communications

Corporate Communications provides guidelines for managing and supporting internal and external communications before, during, and after a PSPS event via a PSPS Communications Playbook. Employees will be aware of the Playbook and their roles in implementation.

### 5.1.1. Communications During Non-PSPS Conditions

PNM will provide a proactive wildfire education and awareness campaign to PNM customers and HFRA communities focused on wildfire prevention and mitigation, PSPS awareness, and outage preparedness.

PNM will utilize multiple tools and message points to support public safety and awareness, including those listed in **Section 5** as well as:

- Routine HFRA customer newsletters.
- Proactive engagement with PNM employees.

- Local community outreach with first responders, customers and community members, regulators, elected officials, Tribal leaders, public safety partners, land managers, critical facility operators and utility service providers.

Examples of PNM’s wildfire education and awareness campaign messaging and communications channels *outside of PSPS conditions* can be seen in **Table 5** and **Figure 13**.

**Table 5. General PSPS Awareness Messaging**

Time Horizon	Pre-Event “Blue Sky” <i>Year-round between Potential Power Shutoff Notification System Activation</i>	
Key Messages		Channels May Include
	PNM anticipates a high wildfire risk season due to prolonged drought.	
	Our crews work year-round to reduce the risk of our system becoming an ignition source for a catastrophic wildfire, including regularly trimming vegetation away from our lines and constantly inspecting poles and other equipment, replacing when necessary.	Paid media; including local print and local radio
	<p>When severe wildfire conditions including high winds and low moisture develop, we implement safety-driven steps that also increase the likelihood of power outages that could last for extended periods of time:</p> <ul style="list-style-type: none"> <li>• Wildfire Safety Mode (WSM): When the National Weather Service issues a Red Flag Warning within High Fire Risk Areas, we change our system settings to automatically de-energize lines when something contacts them, such as tree limbs, windblown debris, or wildlife. This reduces the chance of starting a wildfire. It also could mean more frequent and longer-lasting outages while these settings are in effect. Our crews must manually inspect these lines for damage before they can be safely turned on again, and this process can take an extended period of time.</li> <li>• Public Safety Power Shutoff (PSPS): A last-resort step where we turn off power to parts of our system that run through High Fire Risk Areas. In severe conditions where our system could become the ignition source for a catastrophic wildfire, we will implement a PSPS that could last several hours to several days.</li> </ul>	<p>Social media (paid and organic)</p> <p>Earned media; including radio and TV interviews</p> <p>Press releases</p> <p>Public Service Announcements</p> <p>Email campaign to HFRA customers</p>

<p>PNM will restore power as soon as we safely can, but that could be an extended period of time. Here’s why:</p> <ul style="list-style-type: none"> <li>• First, crews must wait for the severe weather conditions to abate.</li> <li>• Next, they will patrol power lines to ensure there is no damage or risk of ignition when power is turned back on – they may have to wait for daylight, and they may have hundreds of miles of line to inspect in very remote areas.</li> <li>• If they find damage, they will have to make repairs. This work may have to be performed in remote, difficult-to-access areas.</li> </ul>	<p>Town halls</p> <p>Bill messages</p> <p>Direct mail</p>
<p>PNM has developed a notification system similar to what is used by the National Weather Service during hurricanes, thunderstorms, and tornadoes: Public Safety Power Shutoff Advisory, Public Safety Power Shutoff Watch, Public Safety Power Shutoff Warning. Familiarize yourself with our alert system, what each stage means, and what steps you can take.</p>	<p><a href="https://www.pnm.com/wildfire-safety">PNM.com/wildfire-safety</a></p>
<p>PNM is committed to providing customers with the best information it has in a timely manner so that they can take steps to prepare for weather- and wildfire-related outages. Visit <a href="https://www.pnm.com">PNM.com</a> for resources and tips on how to prepare for power outages.</p>	<p><a href="https://www.pnm.com/PSPS">PNM.com/PSPS</a> event specific landing page featuring Public Safety Power Shutoff Alert system</p>
<p>Visit My Account on <a href="https://www.pnm.com">PNM.com</a> to update your contact details.</p>	
<p>If someone in your home relies on electric-powered medical equipment, have a backup power source and enroll in PNM's LifeWatch program for notifications at <a href="https://www.pnm.com/LifeWatch">PNM.com/LifeWatch</a>.</p>	
<p>Prepare an emergency kit with essential items such as medications, medical supplies, flashlights, batteries, battery or crank radio, non-perishable food, water, and important documents.</p>	
<p>A Public Safety Power Shutoff (PSPS) occurs when extreme fire conditions cause PNM to turn off power on parts of its system to avoid starting a wildfire. The Public Safety Power Shutoff (PSPS) is used to keep communities safe by preventing electrical equipment from becoming a possible ignition source. Strong winds, dry conditions, and fire threats can turn power lines into ignition sources. A Public Safety Power Shutoff (PSPS) helps prevent wildfires by shutting off power when these conditions pose a severe risk.</p>	
<p>Extreme weather conditions pose the threat of wildfires. To help prevent damaged power lines from contributing to wildfires, a Public Safety Power Shutoff (PSPS) may occur, which means that you will be without power until it can be safely restored.</p>	
<p>Learn more about wildfire safety at <a href="https://www.pnm.com/wildfire-safety">PNM.com/wildfire-safety</a> and <a href="https://www.pnm.com/PSPS">PNM.com/PSPS</a>.</p>	

**Figure 13. General PSPS Awareness Infographics**



### 5.1.2. Communications During Potential PSPS Conditions

Key communications themes and messaging during potential PSPS conditions include the following:

- **Stay Safe:**

Stay away from downed power lines. If you see a downed power line, do not touch it or anything in contact with it. Call 911 and PNM immediately at 888-DIAL-PNM. Always consider a power line energized and dangerous.

If someone in your home relies on electric-powered medical equipment, have a backup power source and enroll in PNM's LifeWatch program for notifications at [PNM.com/LifeWatch](http://PNM.com/LifeWatch).

- **Stay Prepared:**

The American Red Cross advises customers to prepare a power outage kit including water, food, flashlights, and medications. For more tips from the American Red Cross visit <https://www.redcross.org/get-help/how-to-prepare-for-emergencies/types-of-emergencies/power-outage.html>.

- **Stay Informed:**

PNM is asking our customers to update their contact information with us so that we can provide notifications if a Public Safety Power Shutoff is planned. Update contact information at [PNM.com/login](https://www.pnm.com/login) or by calling us at 888-DIAL-PNM.

PNM may not be aware of a non-PSPS outage in your area unless you report it by texting #OUT to 78766, going online at [PNM.com/outage](https://www.pnm.com/outage), or calling us at 888-DIAL-PNM.

For outage updates, visit [Outagemap.PNM.com](https://www.pnm.com/outagemap).

For more information on wildfire safety, visit [PNM.com/wildfire-safety](https://www.pnm.com/wildfire-safety).

- **Public Safety Power Shutoff:**

A Public Safety Power Shutoff (PSPS) occurs when extreme fire conditions cause PNM to turn off power on parts of its system to avoid starting a wildfire. The Public Safety Power Shutoff (PSPS) is used to keep communities safe by preventing electrical equipment from becoming a possible ignition source. High winds, dry conditions, and fire threats can turn power lines into ignition sources. A Public Safety Power Shutoff (PSPS) helps prevent wildfires by shutting off power when these conditions pose a severe risk.

If a PSPS is likely, PNM will use the outreach tools and channels referenced above to implement the PSPS Communications Playbook. Outreach will include direct customer notifications (based on available contact information) and additional capabilities leveraged through community partner coordination.

The sections below further explain the different phases of communication before, during, and after a PSPS, along with a general overview of the messaging in each phase.

### 5.1.2.1. ADVISORY

*(Two days before possible PSPS)*

**Table 6. PSPS Communications Messaging Stage: ADVISORY**

Key Messaging	Channel
<p>We have issued a Public Safety Power Shutoff ADVISORY.</p> <p>Forecasts show potentially severe wildfire conditions in your area on [DATE].</p> <p>[ADD WHEN APPLICABLE] PNM is placing its system in Wildfire Safety Mode to be more sensitive to wind-blown debris such as tree branches contacting our power lines. In Wildfire Safety Mode power will automatically shut off when there is contact, reducing the risk of igniting a wildfire. You should still treat any downed power line as if it is energized and stay away from it, call 911 and PNM to report it. Power outages are more likely and could last longer.</p> <p>Consider what steps you can take now to prepare for the possibility of extended outages. Go to <a href="http://PNM.com/PSPS">PNM.com/PSPS</a> to see the Public Safety Power Shutoff Alert System status and tips.</p> <p>We will provide updates leading up to [DATE].</p>	<p>Direct customer notification (phone, text, email)</p> <p>Social media</p> <p><a href="http://PNM.com/PSPS">PNM.com/PSPS</a> –Update Community Alert level at 9 P.M.</p> <p>Media advisory</p> <p>Direct phone calls and text communications to NMDHSEM, EMNRD, and local emergency managers</p>

### 5.1.2.2. WATCH

*(Day before possible PSPS by 3 P.M.)*

**Table 7. PSPS Communications Messaging Stage: WATCH**

Key Messaging	Channel
<p>We have issued a Public Safety Power Shutoff WATCH.</p> <p>Forecasts continue to predict severe weather and wildfire conditions in the next 24 hours.</p> <p>If conditions don't improve from what is forecasted, PNM may need to implement a Public Safety Power Shutoff (PSPS). A PSPS will only be implemented as a last resort and may still be avoided, but it is best to be prepared. Please prepare for possible extended power outages.</p> <p>Visit <a href="http://PNM.com/PSPS">PNM.com/PSPS</a> for more information and to check on the Public Safety Power Shutoff Alert System status. We will update the notification status at 9 P.M. if there are any changes.</p> <p>We will reach out with further updates by 9 A.M. tomorrow morning.</p>	<p>Direct customer notification (phone, text, email)</p> <p>Social media</p> <p><a href="http://PNM.com/PSPS">PNM.com/PSPS</a> –Update Community Alert level at 3 P.M. (timestamped with estimated next update)</p> <p>Media advisory</p> <p>Direct phone calls and text communications to NMDHSEM, EMNRD, and local emergency managers</p>

### 5.1.2.3. WARNING

*(Day of possible PSPS by 9 A.M.)*

**Table 8. PSPS Communications Messaging Stage: WARNING**

Key Messaging	Channel
<p>We have issued a Public Safety Power Shutoff WARNING. Near-term forecasts continue to predict severe weather and fire conditions today. Real-time weather data is tracking with forecasts.</p> <p>These conditions are likely to necessitate a Public Safety Power Shutoff (PSPS) after [TIME] to prevent our system from possibly igniting a wildfire.</p> <p>The decision to implement a PSPS will be made quickly and without additional notice. Please prepare to be without power for an extended period of time. A PSPS will be implemented only as a last resort – it is still possible a PSPS can be avoided, but it’s best to be prepared.</p> <p>Visit <a href="http://PNM.com/PSPS">PNM.com/PSPS</a> for updated information and tips to prepare.</p>	<p>Direct customer notification (phone, text, email)</p> <p>Social media</p> <p><a href="http://PNM.com/PSPS">PNM.com/PSPS</a> –Update Community Alert level</p> <p>Media advisory</p> <p>Direct phone calls and text communications to NMDHSEM, EMNRD, and local emergency managers</p>

### 5.1.2.4. Weathering the Storm

*(As soon as possible following De-Energization)*

**Table 9. PSPS Communications Messaging Stage: Weathering the Storm**

Key Messaging	Channel
<p>A PSPS has been implemented. Power is out to [XXX] customers within these general boundaries...</p> <p>PNM initially estimates power will be back on by [XXX] Time assuming there is no storm damage.</p> <p>PNM will provide an update when inspection has begun.</p>	<p>Direct customer notification to PSPS-affected customers (phone, text, email)</p> <p>Outage alerts via OMS system</p> <p>Social media</p> <p><a href="http://Outgagemap.PNM.com">Outgagemap.PNM.com</a> banner</p> <p>Media advisory</p> <p>Direct phone calls and text communications to NMDHSEM, EMNRD, and local emergency managers</p>

### 5.1.2.5. Inspection Patrol

**Table 10. PSPS Communications Messaging Stage: Inspection Patrol**

Key Messaging	Channel
<p>Safe conditions now allow PNM crews to begin inspecting the system for damage.</p> <p>There are [XXX] miles of line that must be visually inspected. [XXX] crews with aerial support are working as quickly and safely as possible to determine what repairs may be needed.</p> <p>If there is no damage, PNM estimates power will be restored by [XXX] Time. We will provide an updated restoration time based on new information from the inspection.</p>	<p>Direct notification to PSPS-affected customers (phone, text, email)</p> <p>Social media – every two hours or more as possible throughout restoration phase showing crews at work</p> <p><a href="http://Outagemap.PNM.com">Outagemap.PNM.com</a> banner</p> <p>Media advisory – media ride-along if feasible</p> <p>Direct phone calls and text communications to NMDHSEM, EMNRD, and local emergency managers</p>

### 5.1.2.6. Inspection Patrol Completed

**Table 11. PSPS Communications Messaging Stage: Inspection Patrol Completed**

Key Messaging	Channel
<p>Depending on inspection results:</p> <ul style="list-style-type: none"> <li>• Crews have completed inspection, and power is estimated to be restored by [XXX] TIME.</li> <li>• Crews have found damage to the system. Repairs will be made as quickly and safely as possible. Most customers are expected to have power by [XXX] TIME.</li> </ul>	<p>Direct notification to PSPS-affected customers (phone, text, email)</p> <p>Outage alerts via OMS</p> <p>Social media</p> <p>Website – <a href="http://Outagemap.PNM.com">Outagemap.PNM.com</a></p> <p>Direct phone calls and text communications to NMDHSEM, EMNRD, and local emergency managers</p>

5.1.2.7. PSPS: Power Has Been Restored

**Table 12. PSPS Communications Messaging Stage: PSPS Has Been Restored**

Key Messaging	Channel
<p>The PSPS is now over. [XXX] customers have been restored. [XXX] customers remain without power due to damage caused by the severe weather.</p> <p>If you are still without power, please report your power outage at <a href="http://PNM.com/report-an-outage">PNM.com/report-an-outage</a>, or by calling 888-DIAL PNM.</p> <p>Go to <a href="http://Outagemap.PNM.com">Outagemap.PNM.com</a> for the latest available outage information.</p> <p>PNM estimates all customers will be restored by [XXX] time.</p>	<p>Direct notification to PSPS-affected customers (phone, text, email)</p> <p>Outage alerts via OMS</p> <p>Social media</p> <p>Website – <a href="http://Outagemap.PNM.com">Outagemap.PNM.com</a></p> <p>Media advisory</p> <p>Direct phone calls and text communications to NMDHSEM, EMNRD, and local emergency managers</p>

5.1.2.8. All Customers Restored

**Table 13. PSPS Communications Messaging Stage: All Customers Restored**

Key Messaging	Channel
<p>PNM crews have repaired all damage caused to the system by recent severe weather. At this time, all customers in [AFFECTED AREA] should have power.</p> <p>If you are still without power, please report your power outage at <a href="http://PNM.com/report-an-outage">PNM.com/report-an-outage</a>, or by calling 888-DIAL PNM.</p> <p>Go to <a href="http://Outagemap.PNM.com">Outagemap.PNM.com</a> for the latest outage information.</p>	<p>Direct notification to all HFRA customers (phone, text, email)</p> <p>Social media</p> <p>Website</p> <p>Media advisory</p> <p>Direct phone calls and text communications to NMDHSEM, EMNRD, and local emergency managers</p>

## 5.2. Customer Support via Contact Center

Customers may contact the Contact Center for a variety of reasons. If a PSPS has been activated, the Contact Center staff will provide direct customer notifications and address customer calls.

In the event of a PSPS, the Contact Center will support customers during normal Contact Center hours of operation (7:30 A.M. -- 6:00 P.M. Monday through Friday MST) as well as after hours of operation, if needed (including holidays).

The Contact Center will also assist with the identification of, and communication with, any vulnerable customers, including LifeWatch customers dependent on medical devices.

## 5.3. Regulatory and Governmental Coordination

The Regulatory and Government Affairs teams will coordinate communications between PNM and government stakeholders during a PSPS event. These departments work closely with System Operations, DOC, and Corporate Communications to establish the messaging, timing, and delivery of necessary announcements to the respective government stakeholders. Government Affairs will coordinate with the appropriate government agencies that will deploy available resources to assist the PNM restoration process.

PNM’s Crisis Management and Resilience Team works closely with local emergency managers, the Energy, Minerals and Natural Resources Department (EMNRD), and the New Mexico Department of Homeland Security and Emergency Management (NMDHSEM) to notify and communicate potential events by text, phone, and local emergency operation center participation. Stakeholders are kept apprised as PSPS activities evolve from the first phase of a potential PSPS event through its conclusion/close of the PNM EOC.

### Figure 14. Example Flow of Notifications and Outreach by PNM’s CMR Team

1. PNM Wildfire Team internally reports a CRI at or above threshold and may suggest activation of the PNM EOC.
2. PNM Government Affairs notifies the Governor’s Office of a PNM PSPS EOC Activation.
3. PNM CMR Team sends local emergency managers, EMNRD, and NMDHSEM notifications of PNM PSPS EOC Activation by text and/or call.
4. PNM CMR Team sends internal stakeholders text message and email alerts notifying employees of the upcoming PNM PSPS EOC Activation and its scheduled next meeting time and login information.
5. PNM PSPS EOC is activated (Webex meetings are coordinated, scheduled, and held with PNM internal stakeholders throughout event horizon and, if necessary, restoration activities). Relevant updates are captured for information dissemination by CMR Team to external stakeholders.
6. PNM CMR Team continues regular text, call, and local emergency operation center participation, as needed, with local first responders and emergency managers, NMDHSEM, and EMNRD, throughout potential PSPS event and through close of the PNM PSPS EOC.

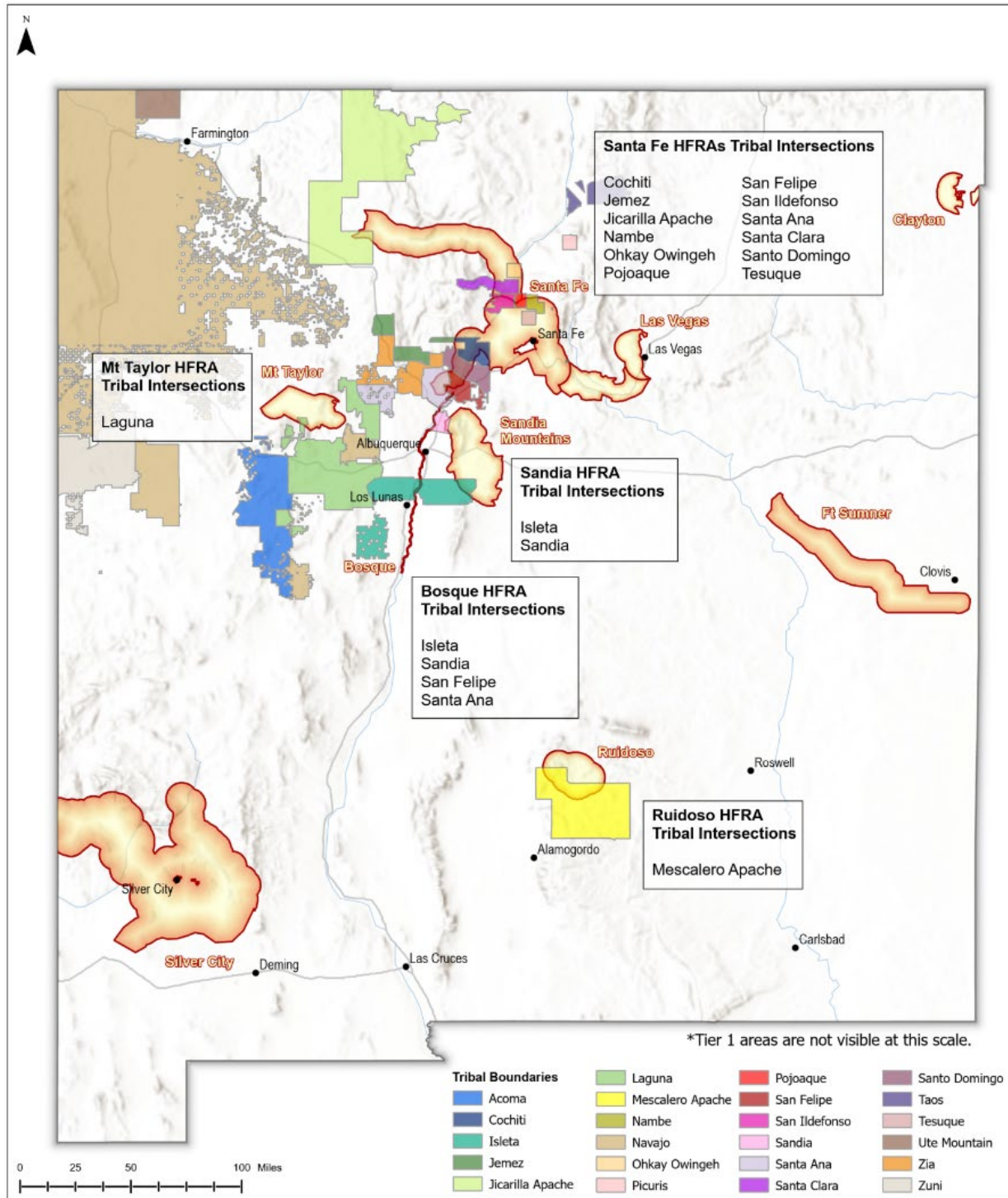
## 5.4. Tribal Engagement Coordination

PNM recognizes and acknowledges the sovereignty of Tribes and their rights to govern their lands. PNM works with Tribes that own lands within the Rio Grande Bosque to assess vegetation management on an annual basis.

PNM's service territory and infrastructure areas include Tribes that intersect these HFRA's (see **Figure 15**). Tribal communities affected by a potential PSPS are included in PNM's PSPS communications. PNM's Tribal Relations team will engage with Tribal leadership and key stakeholders during PSPS events through various means such as direct phone calls, emails, online meetings, and in-person interactions. Communications may also include coordinating access to Tribal lands if needed during the Restoration Phase.

Additionally, PNM will collaborate with Tribes and their emergency management managers to explore the option of alert systems notifications. The PNM Tribal Relations team will organize these information sessions for Tribal leaders and key stakeholders, if requested.

Figure 15. PNM HFRAs with Tribal Boundaries



PNM HFRAs with Tribal Boundaries

2025

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## 5.5. Large Managed Accounts Coordination

PNM's Large Managed Accounts team has the primary function of maintaining a clear line of communication between PNM and large industrial and commercial ("managed") customers. PNM Account Managers are assigned to specific accounts and maintain lists of key points of contact to facilitate PSPS communications and coordination.

The Large Managed Accounts team works with internal PNM teams and managed customer accounts to coordinate potential sites for PSPS material and event staging areas.

## 5.6. Community Support and Coordination

Prior to PSPS events, PNM will work with local agencies that manage community centers. If a PSPS event is imminent, PNM will help local emergency management personnel communicate available community resources that are identified by the local government and community emergency management.

## 5.7. Educational Outreach

A vital component of wildfire preparedness is proactive wildfire education. PNM distributes external communications focused on proactive wildfire education throughout the year. In 2025, PNM's outreach efforts included:

- ❖ Newsletters
- ❖ Postcards
- ❖ Bill messages/inserts
- ❖ Energy works articles
- ❖ Social media posts
- ❖ Media releases
- ❖ Interviews (radio / TV)

## 5.8. Community Engagement, Feedback, and Training

PNM engages with communities, first responders, emergency managers, local and state governments, Tribes and Pueblos, and large business customers throughout the year. In 2025, PNM held one community meeting in each HFRA.

Additionally, PNM hosts scenario-based, PSPS tabletop exercises with internal and external stakeholders. Invitations to these events are shared with select emergency managers, NMPRC representative(s), local government, and Tribal stakeholders.

Throughout 2025 and Q1 of 2026, PNM held three large-scale PSPS tabletop exercises. These exercises were thoughtfully designed to walk through PSPS scenarios from event evaluation through restoration. There was robust external engagement at these events from community partners with emergency management, fire, Tribal, NWS, New Mexico Healthcare Coalition, Presbyterian, Lovelace, University of New Mexico Hospital, The Red Cross, as well as local government and state agencies including: EMNRD, NMDHSEM, New Mexico Department of Health (NMDOH), and NMPRC staff. Additionally, each event had over 100 PNM employees participating in the scenarios together with external community partners. After each tabletop, PNM and external stakeholders continued dialogue, shared information, and provided feedback for consideration and integration. These tabletops have provided an invaluable platform for continuous improvement and learning, with access to insight and feedback from the communities we serve and those on the front lines keeping our communities safe. PNM uses this knowledge to inform and further develop collective programs and processes.

On Thursday, March 5, 2026, PNM participated in the Village of Ruidoso's *Operation Dark Ridge* tabletop exercise, which focused on preparedness for a potential PSPS. The exercise walked participants through PNM's Advisory, Warning, and Watch notification stages as well as our corresponding EOC phases. Throughout the session, Ruidoso staff and partner agencies shared their planned actions, coordination needs, and operational challenges at each stage. PNM received feedback on aligning messaging with local emergency managers. We are working with local emergency managers and public information officers (PIOs) to ensure consistent public notifications.

Participants share their feedback, questions, concerns, and comments during community meetings and PSPS tabletop exercises. PNM uses these shared insights to further guide conversations, solicit feedback from government and regulatory partners, and continuously improve the PSPS Plan, which is filed with the NMPRC as a separate document and is part of PNM's Load Curtailment.

PNM is committed to continuous improvement in incident management. Periodic training exercises are developed and implemented to ensure that personnel not regularly involved in incident management become familiar with and prepared for a PSPS response. These exercises also promote preparedness and interagency coordination to ensure appropriate interaction with first responders, government partners, media, and other stakeholders directly engaged in PSPS preparation and response activities. PNM also participates in exercises hosted by our public safety partners to enhance a mutual understanding of each other's emergency operations and ensure seamless interactions during PSPS events.

PNM evaluates exercises and actual response incidents to identify issues raised both during the event (i.e., the exercise or incident) and afterward while preparing the AAR and documenting lessons learned. Lessons learned may be implemented for inclusion in PNM's response and restoration procedures.

PSPS exercises will be implemented at least annually using various scenarios that test all or any portion(s) of the PSPS Plan, and may include:

- Illustrating the phasing process when a PSPS is being considered.
- Defining roles and responsibilities for PSPS Plan operations during the exercise.
- Engaging in external agency partner participation with the exercise(s).
- Exercising the Emergency Operations Center functions and decision-making processes.
- Demonstrating public notification and outreach plans and processes.
- Practicing the identification and capacity limits on Transmission and Distribution (T&D) assets.
- Walking through the de-energization and re-energization PSPS process through hypothetical scenarios.

## 6. Next Steps

PNM is committed to continuing wildfire awareness collaboration and communication with communities. Several next steps have been identified to continue to inform and improve upon the PSPS Plan, including:

PNM continues to collaborate with community partners, cultivate and sustain critical relationships with local, state, federal and Tribal partners, and communities.

PNM is committed to continuing wildfire awareness collaboration and communication with communities. Several next steps have been identified to continue to inform and improve upon the PSPS Plan, including:

- PNM’s outreach and engagement plan has been developed and wildfire preparedness and PSPS communications continue to reach New Mexico communities, customers within HFRA and beyond via media, radio, community presentations, and stakeholder engagement.
- The company engages regularly with local and state emergency managers and participates in regular calls with all emergency managers, including the Federal Emergency Management Agency (FEMA) and NMDHSEM, to support preparedness in the event of a PSPS.
- PNM maintains its LifeWatch service to support customers who may have medical vulnerabilities and require an energy-dependent medical device to support their well-being.
- PNM is collaborating with NMDHSEM and local emergency managers to better understand critical infrastructure and access and functional needs populations. NMDHSEM informed PNM that it is working towards creating and maintaining a database of crucial information.
- PNM posts its PSPS and WMP on [PNM.com/wildfire-safety](https://www.pnm.com/wildfire-safety). Additional educational wildfire preparedness materials are also made readily available to site visitors.
- Community events, local government presentations, and other engagement activities continue with PNM participation.

The threat of catastrophic wildfire is a statewide issue; it requires the work and collaboration of all New Mexicans to support positive outcomes. PNM is thankful for the partnerships with community members, public health and safety, first responders, Tribes and Pueblos, governmental, environmental, land agencies, and policymakers. This year, PNM looks forward to continuing close collaboration with emergency management, Tribal partners, local, state, and federal government, and communities through year-round customer and community conversations and outreach.

The following list identifies PNM’s prioritized goals for community outreach and education:

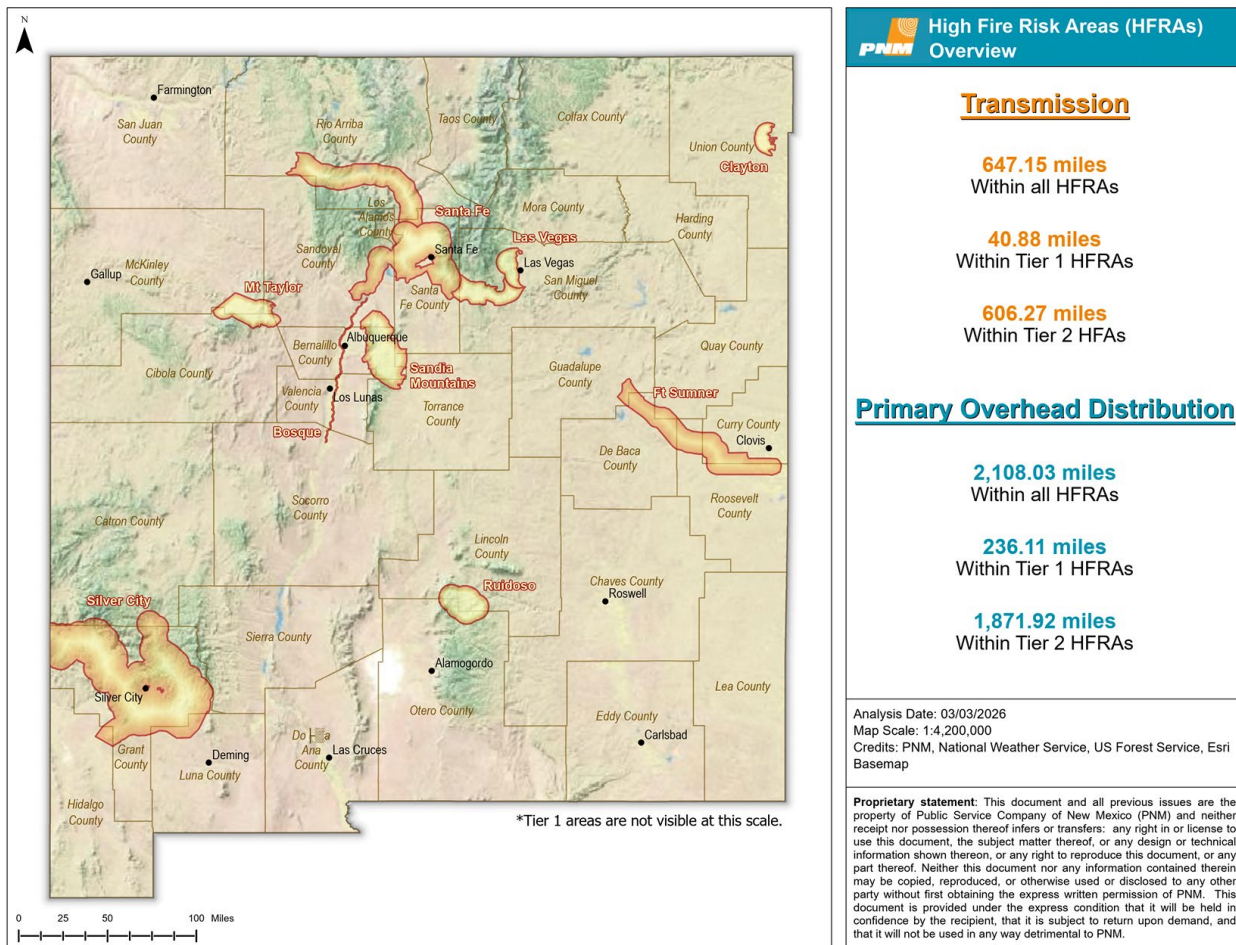
- Support efficient data transfer and facilitate data sharing agreements with localities that have GIS critical infrastructure and facility data to share with PNM.
- Cultivate a network of Unmanned Aircraft Systems (UAS) drone support and helicopter support services to support timely restoration if/when a PSPS event occurs.

- Continue conversations with Tribes and Pueblos, local, state, and federal government, and communities.
- Conduct an ongoing customer awareness campaign to urge year-round preparedness.

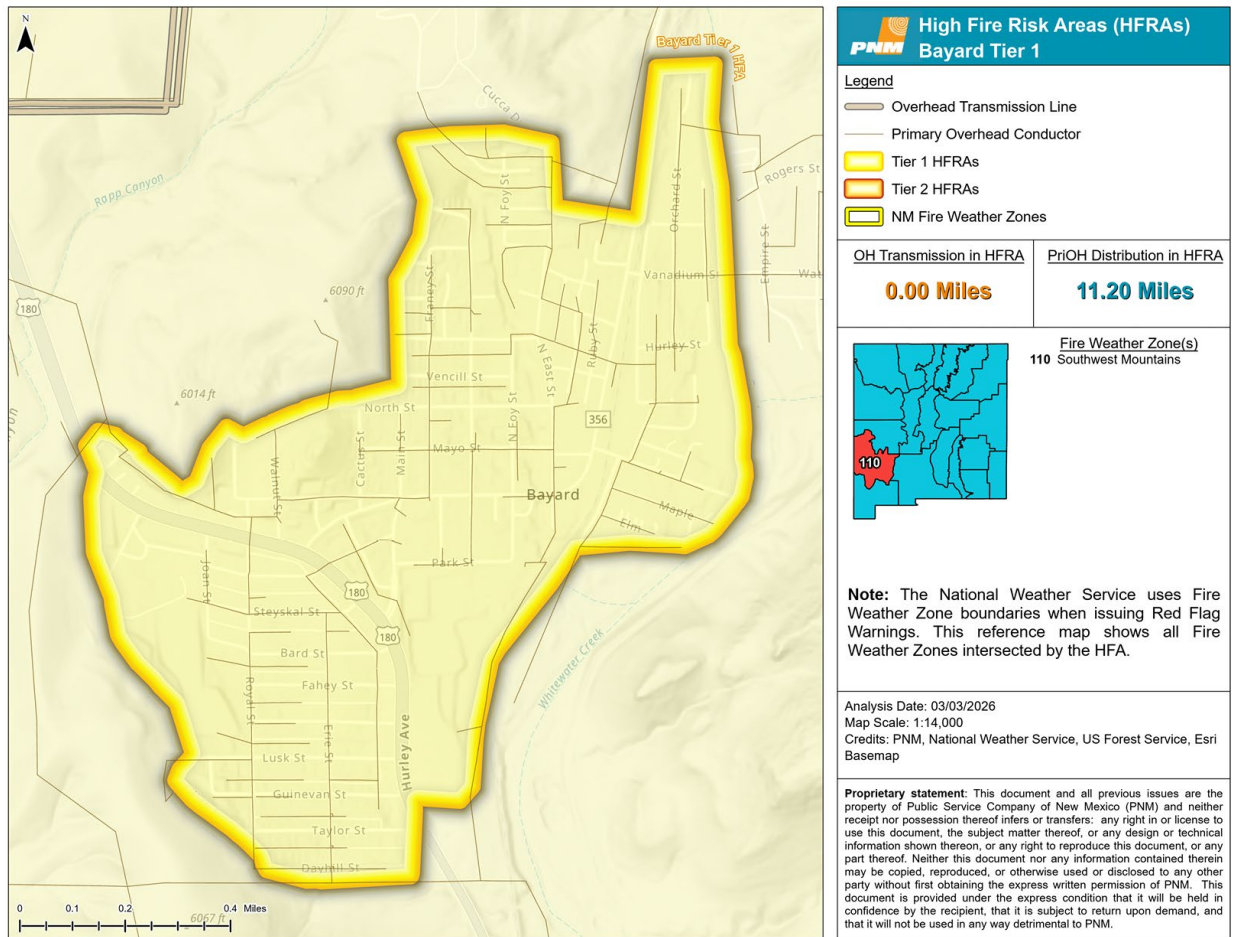
# APPENDIX A

## HIGH FIRE RISK AREA MAPS

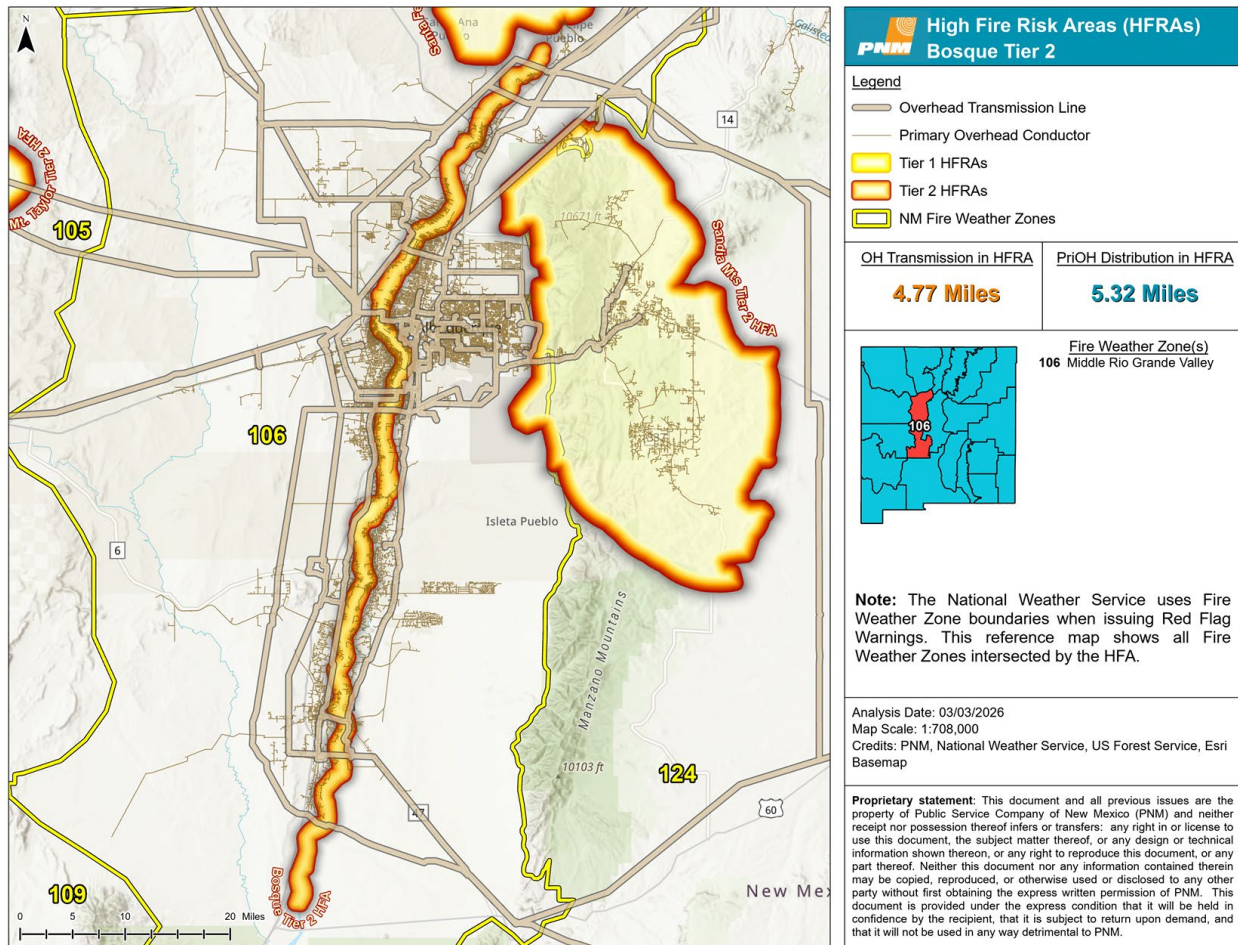
## High Fire Risk Areas (HFRAs): Overview



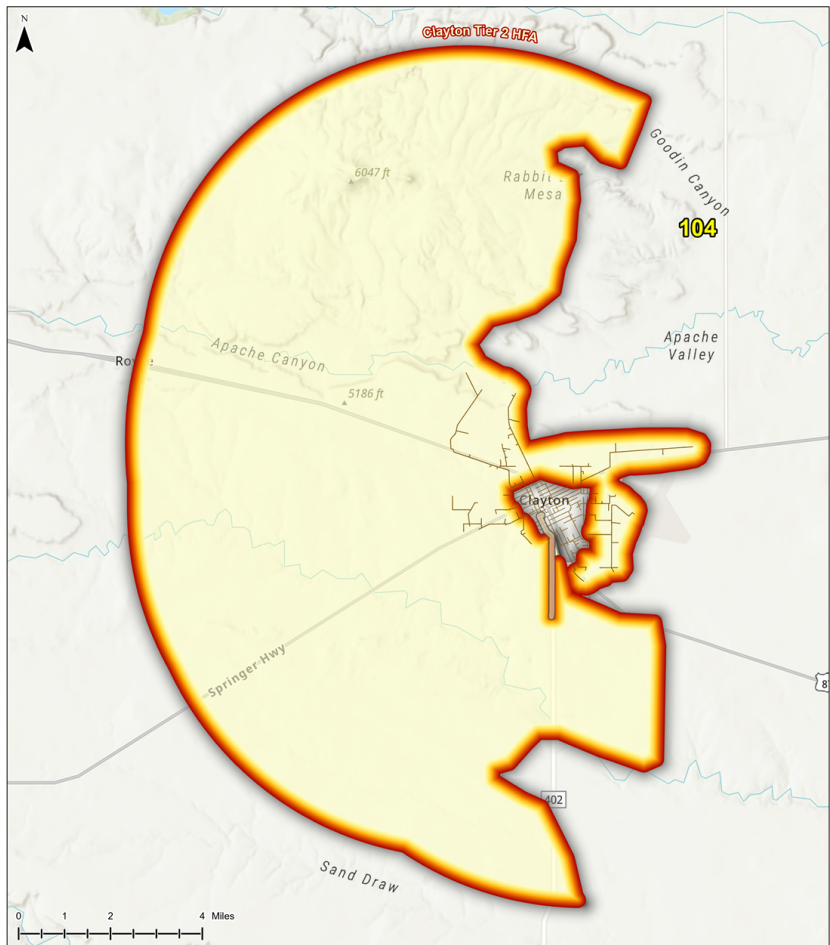
## High Fire Risk Areas (HFRA): Bayard Tier 1



### High Fire Risk Areas (HFRAs): Bosque Tier 2

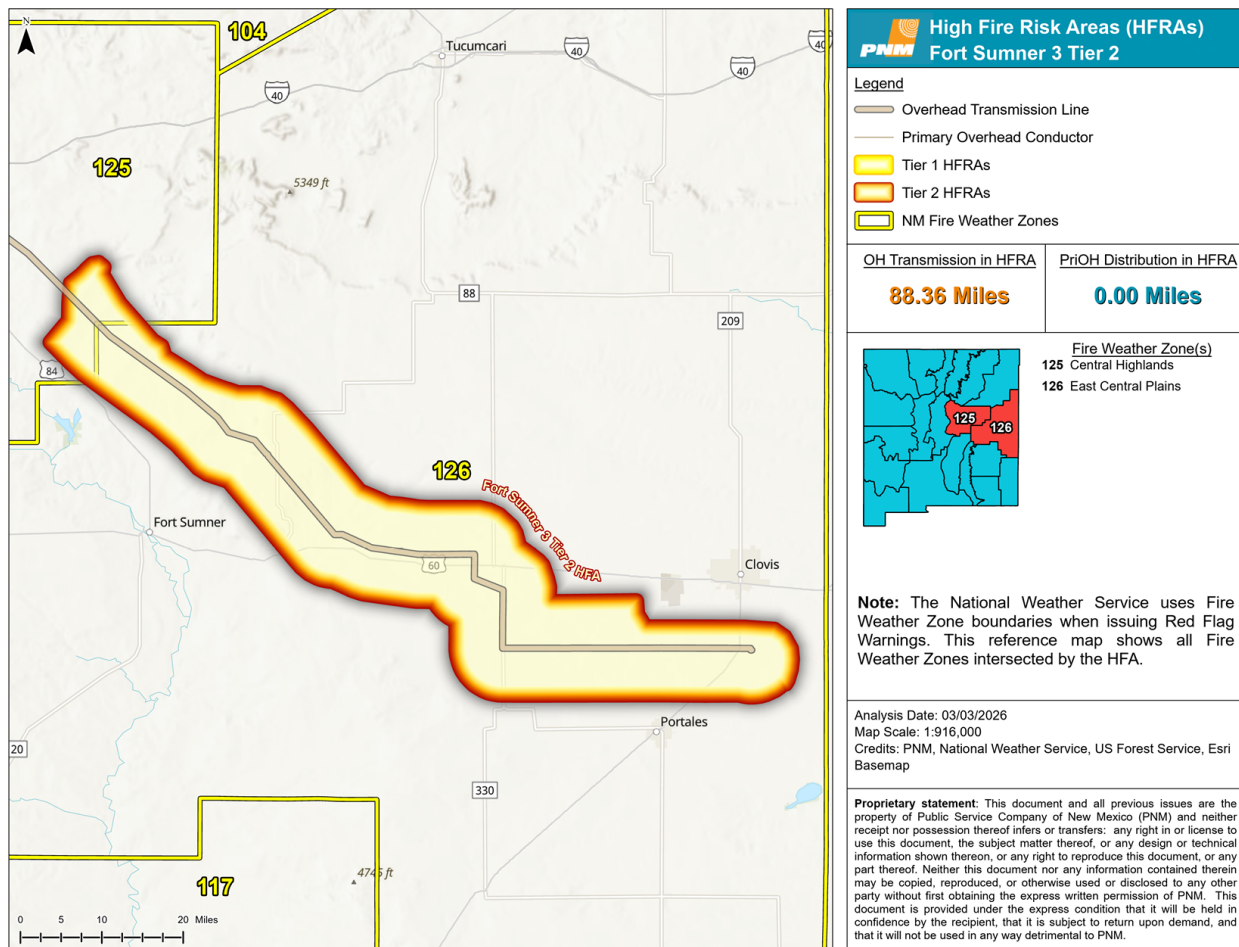


## High Fire Risk Areas (HFRAs): Clayton Tier 2

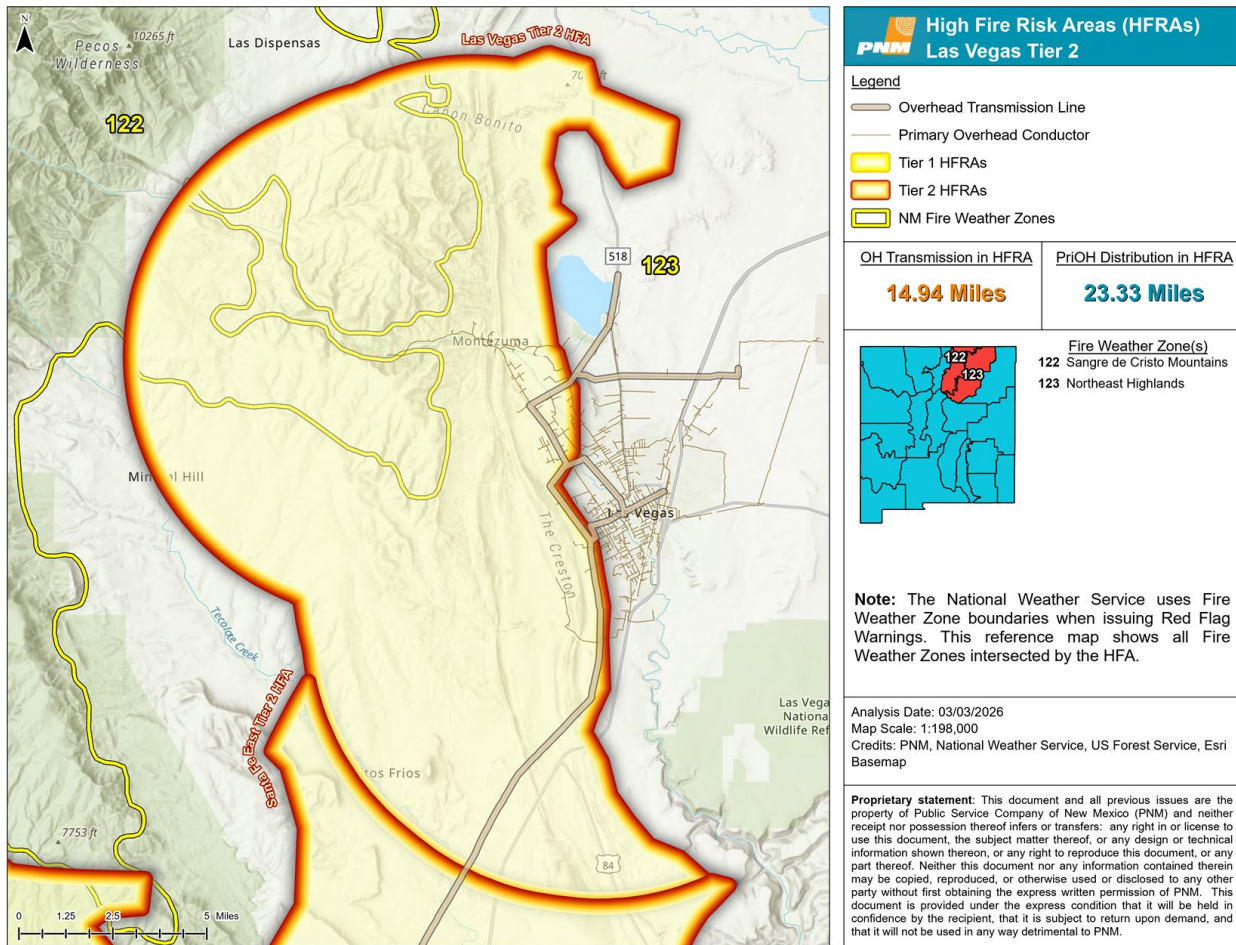


PNM High Fire Risk Areas (HFRAs) Clayton Tier 2	
<b>Legend</b>	
	Overhead Transmission Line
	Primary Overhead Conductor
	Tier 1 HFRAs
	Tier 2 HFRAs
	NM Fire Weather Zones
<b>OH Transmission in HFA</b>	<b>PriOH Distribution in HFA</b>
<b>0.00 Miles</b>	<b>19.23 Miles</b>
	<b>Fire Weather Zone(s)</b> 104 Northeast Plains
<p><b>Note:</b> The National Weather Service uses Fire Weather Zone boundaries when issuing Red Flag Warnings. This reference map shows all Fire Weather Zones intersected by the HFA.</p>	
<p>Analysis Date: 03/03/2026 Map Scale: 1:162,000 Credits: PNM, National Weather Service, US Forest Service, Esri Basemap</p>	
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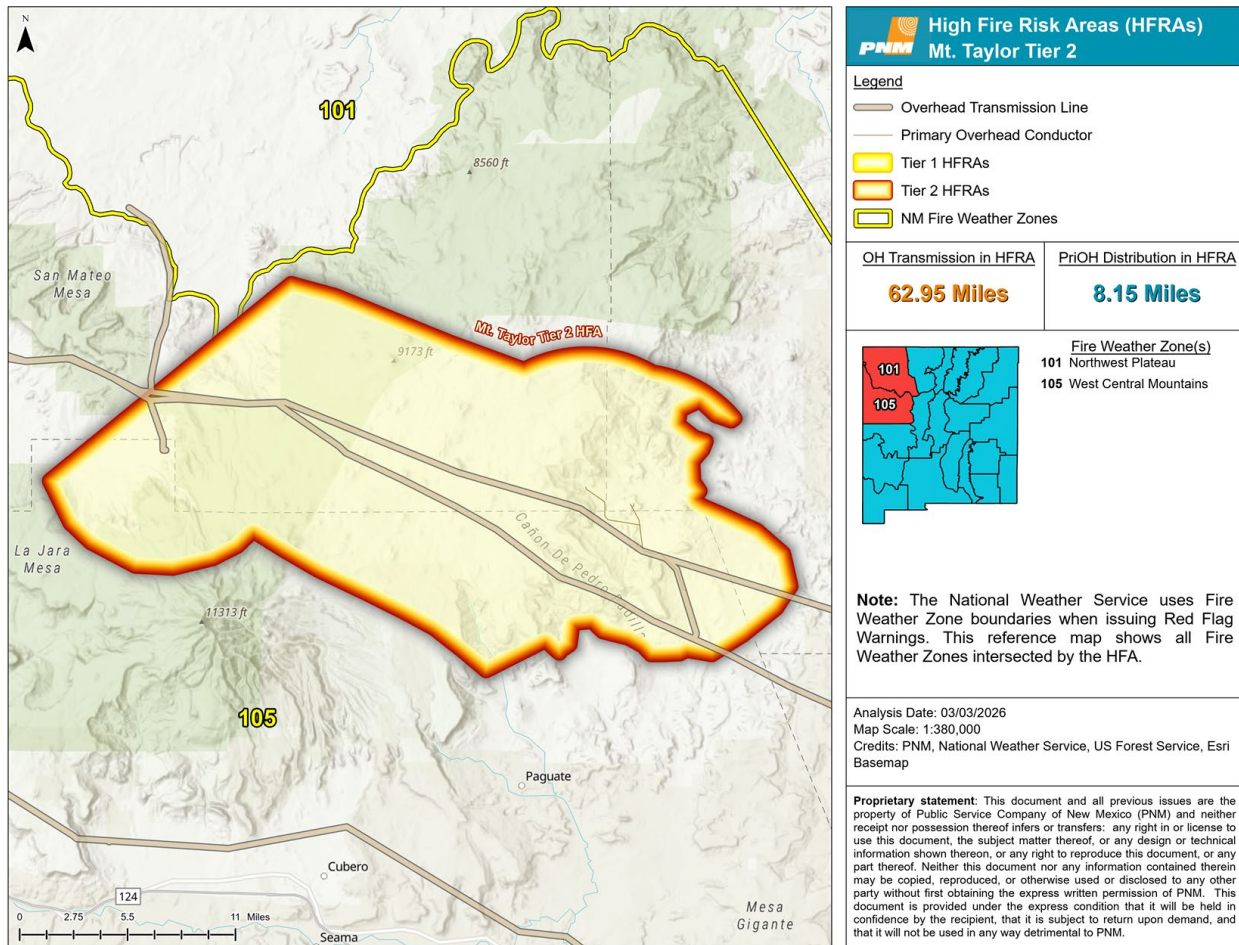
## High Fire Risk Areas (HFRAs): Fort Sumner Tier 2



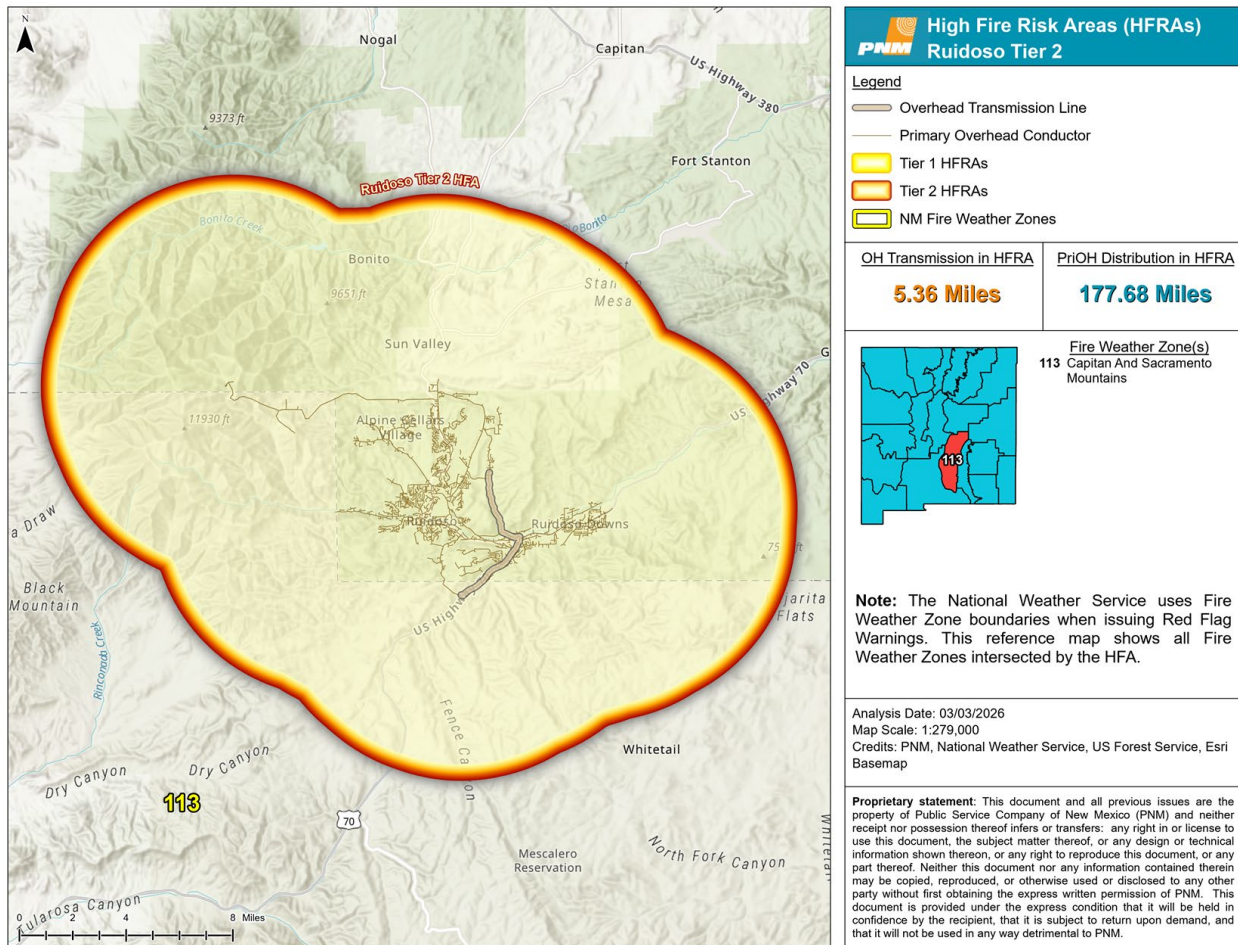
## High Fire Risk Areas (HFRA): Las Vegas Tier 2



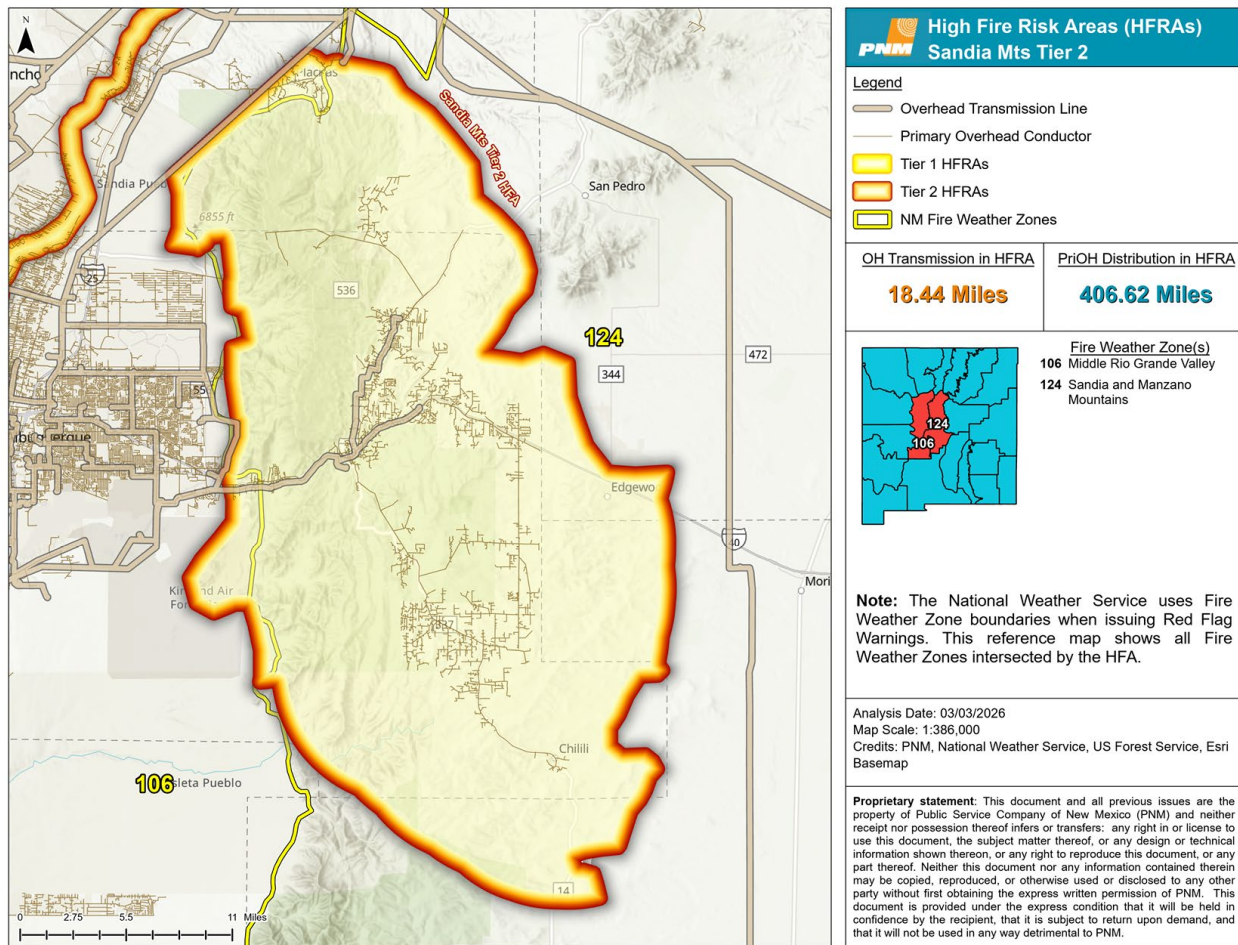
## High Fire Risk Areas (HFRAs): Mt. Taylor Tier 2



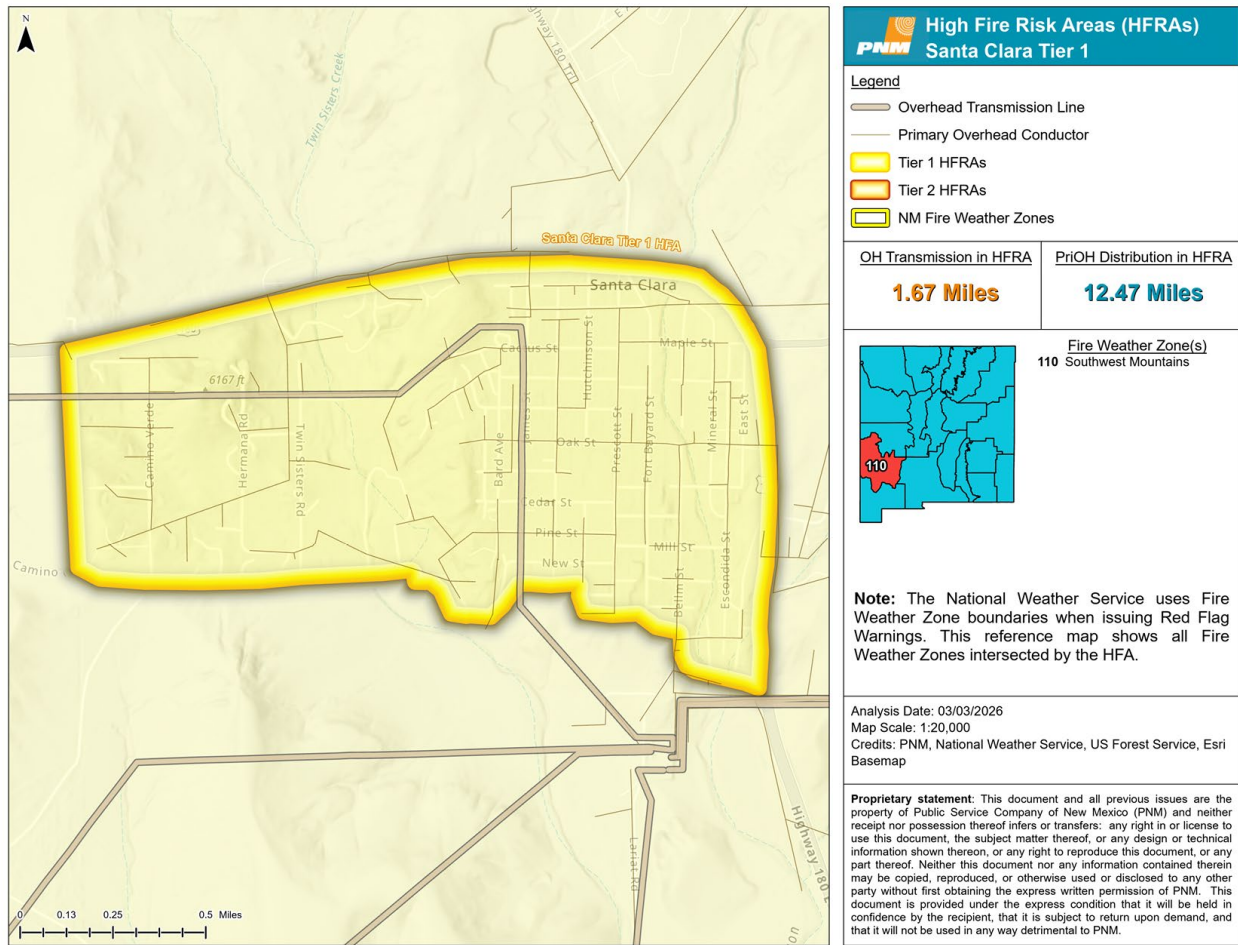
## High Fire Risk Areas (HFRAs): Ruidoso Tier 2



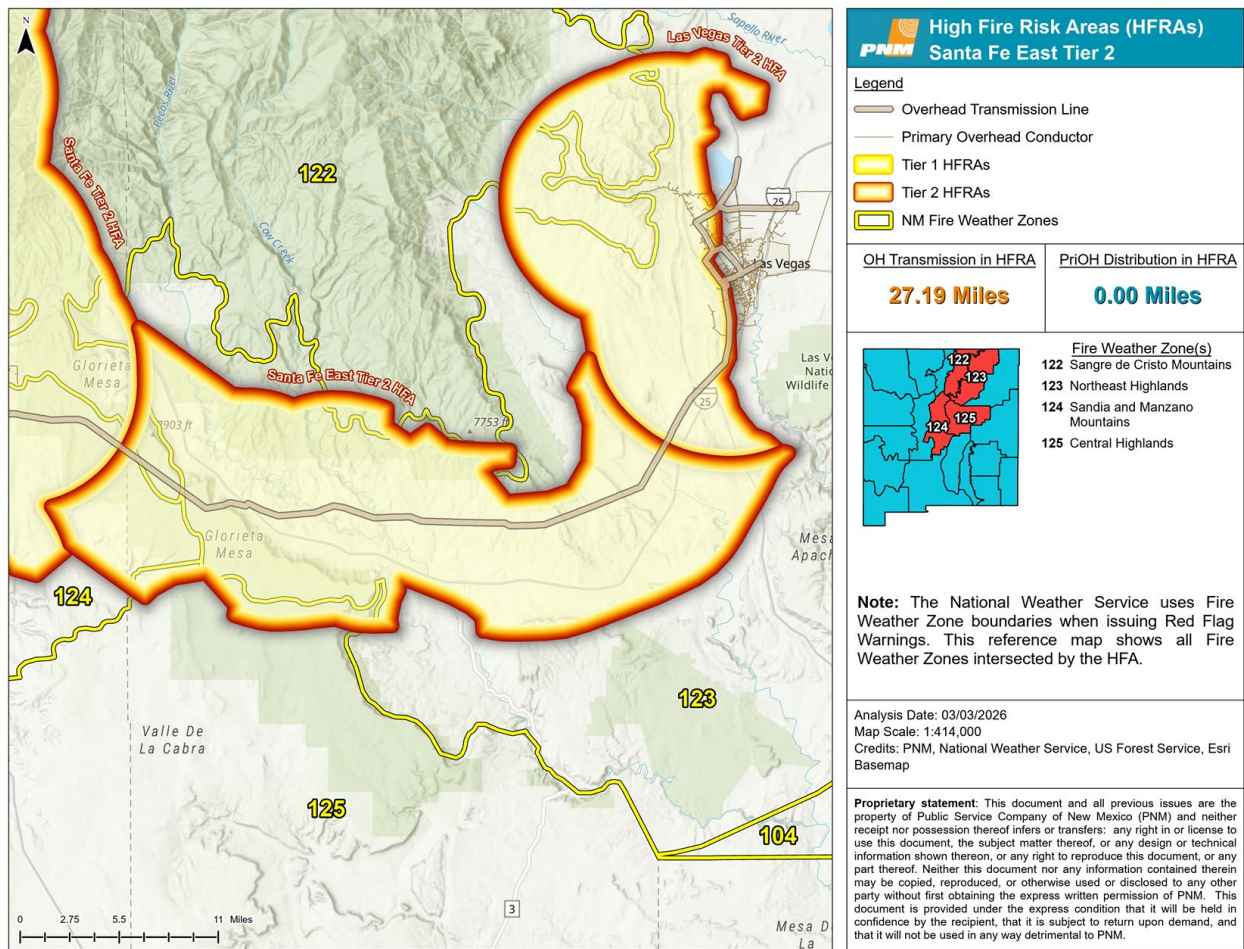
## High Fire Risk Areas (HFRA): Sandia Mts Tier 2



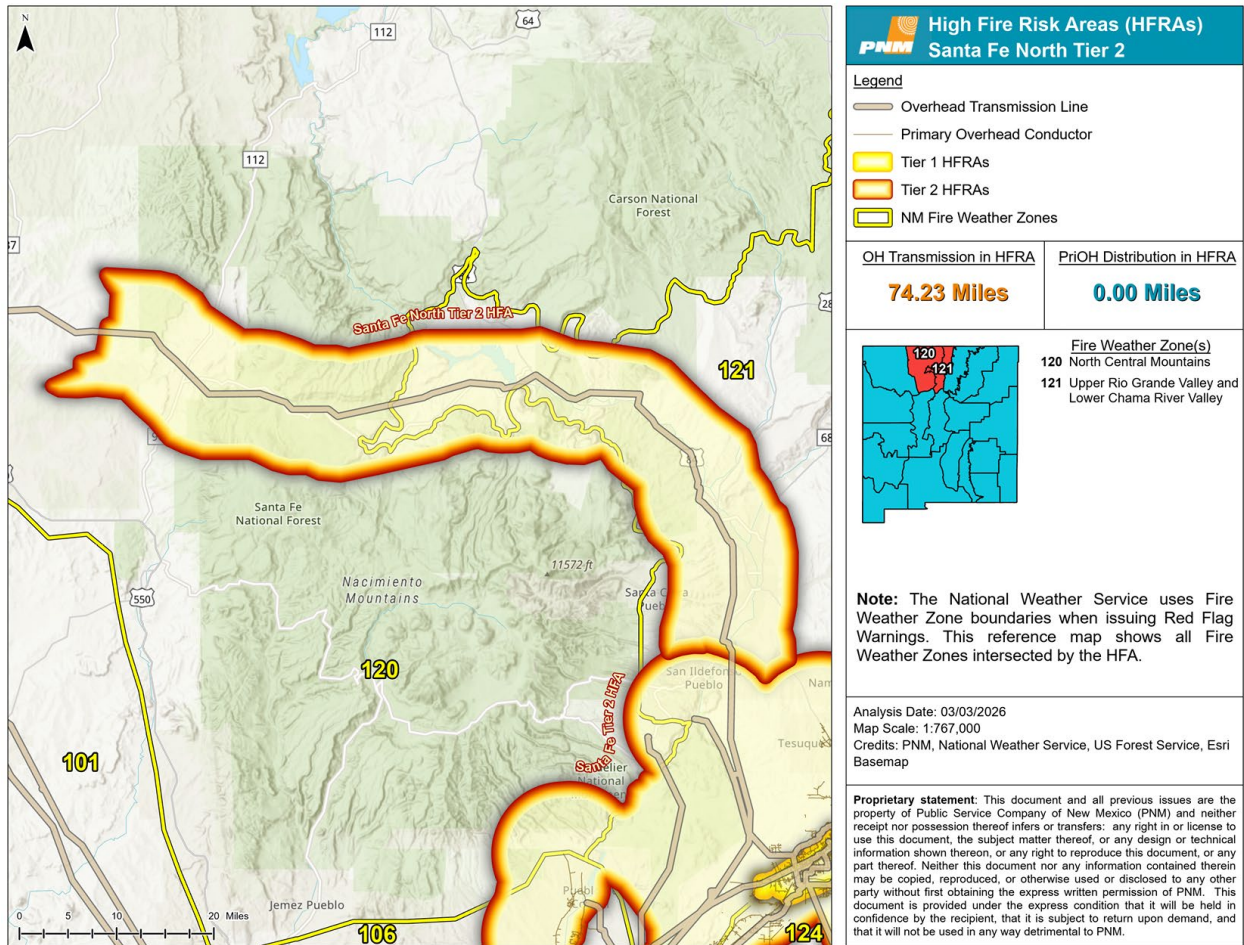
## High Fire Risk Areas (HFRA): Santa Clara Tier 1



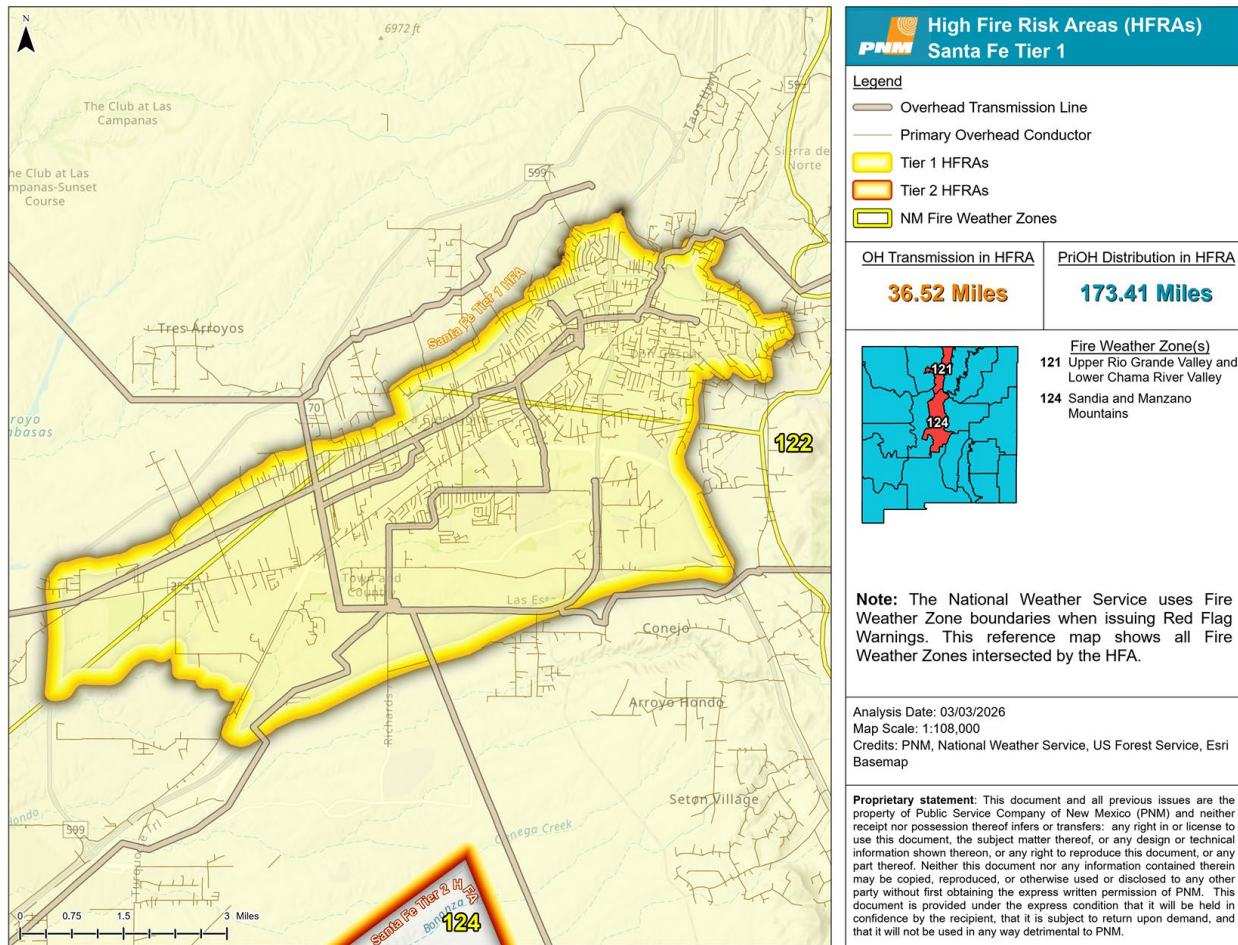
### High Fire Risk Areas (HFRAs): Santa Fe East Tier 2



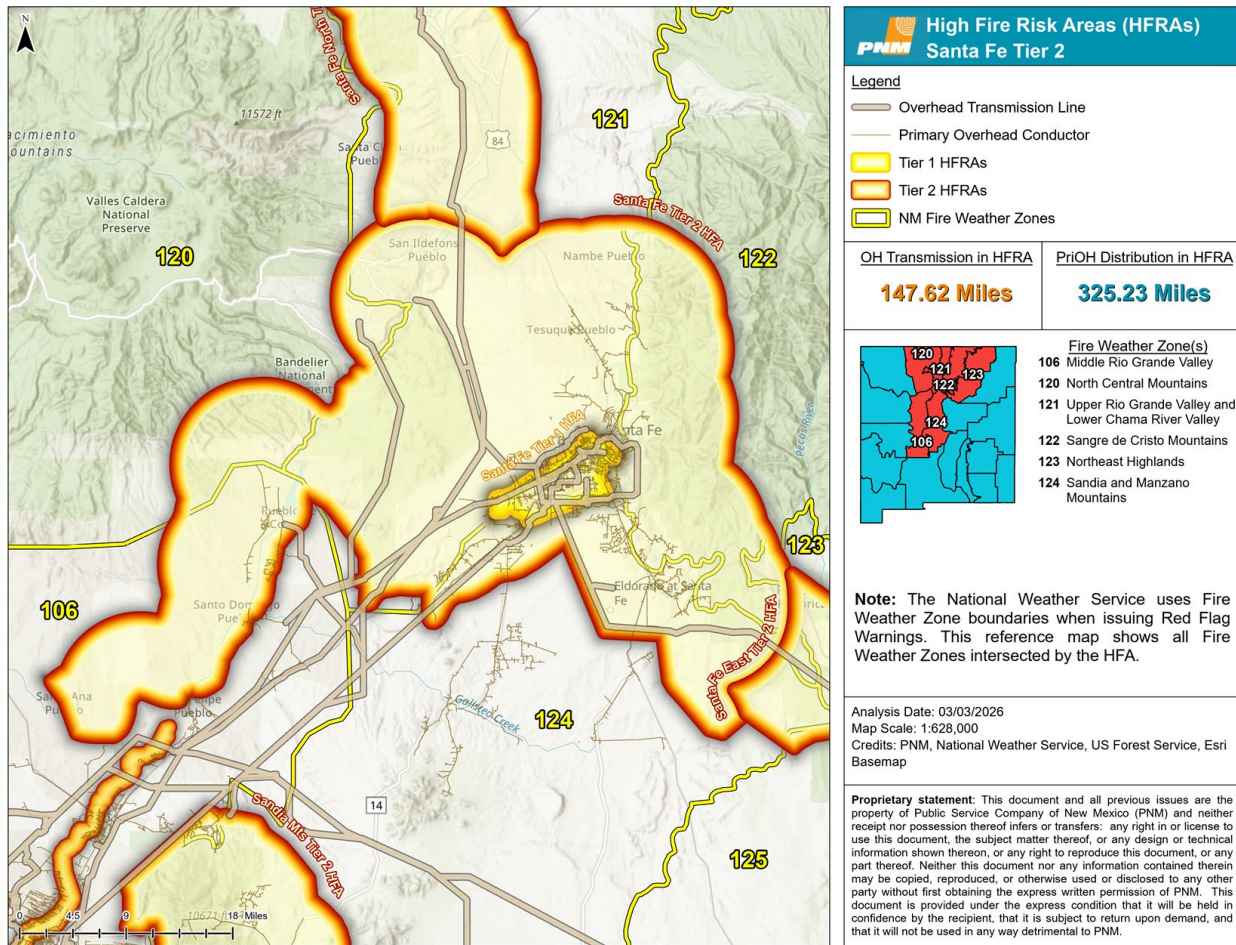
## High Fire Risk Areas (HFRAs): Santa Fe North Tier 2



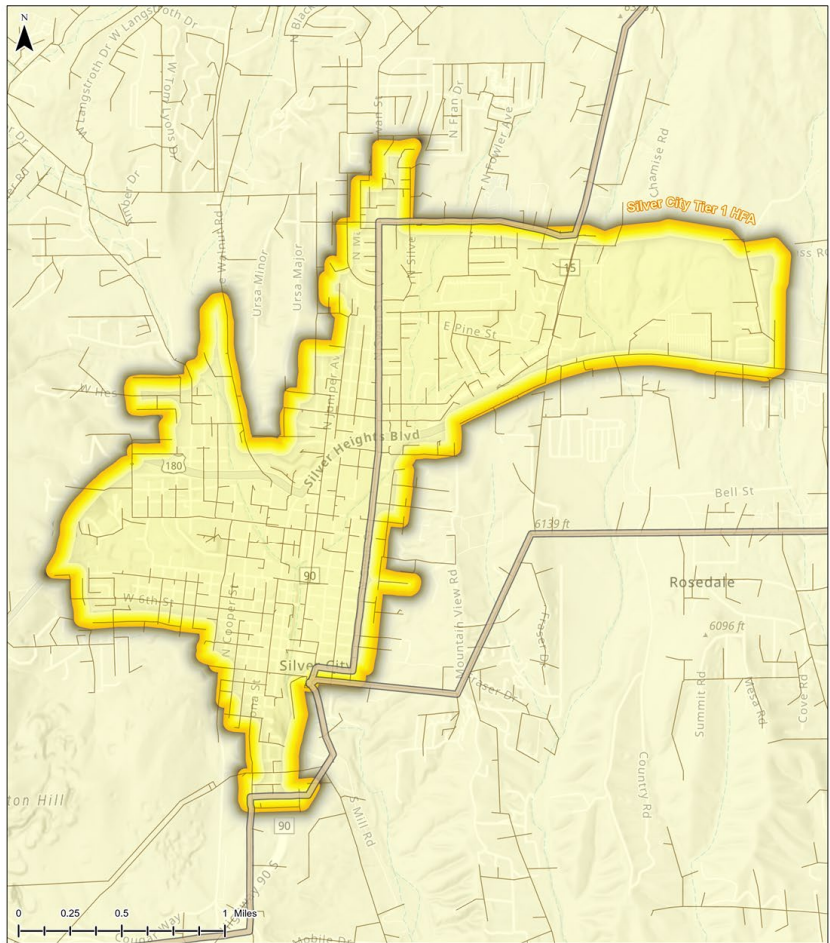
## High Fire Risk Areas (HFRAs): Santa Fe Tier 1

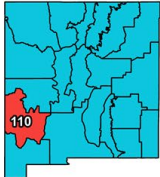


## High Fire Risk Areas (HFRAs): Santa Fe Tier 2

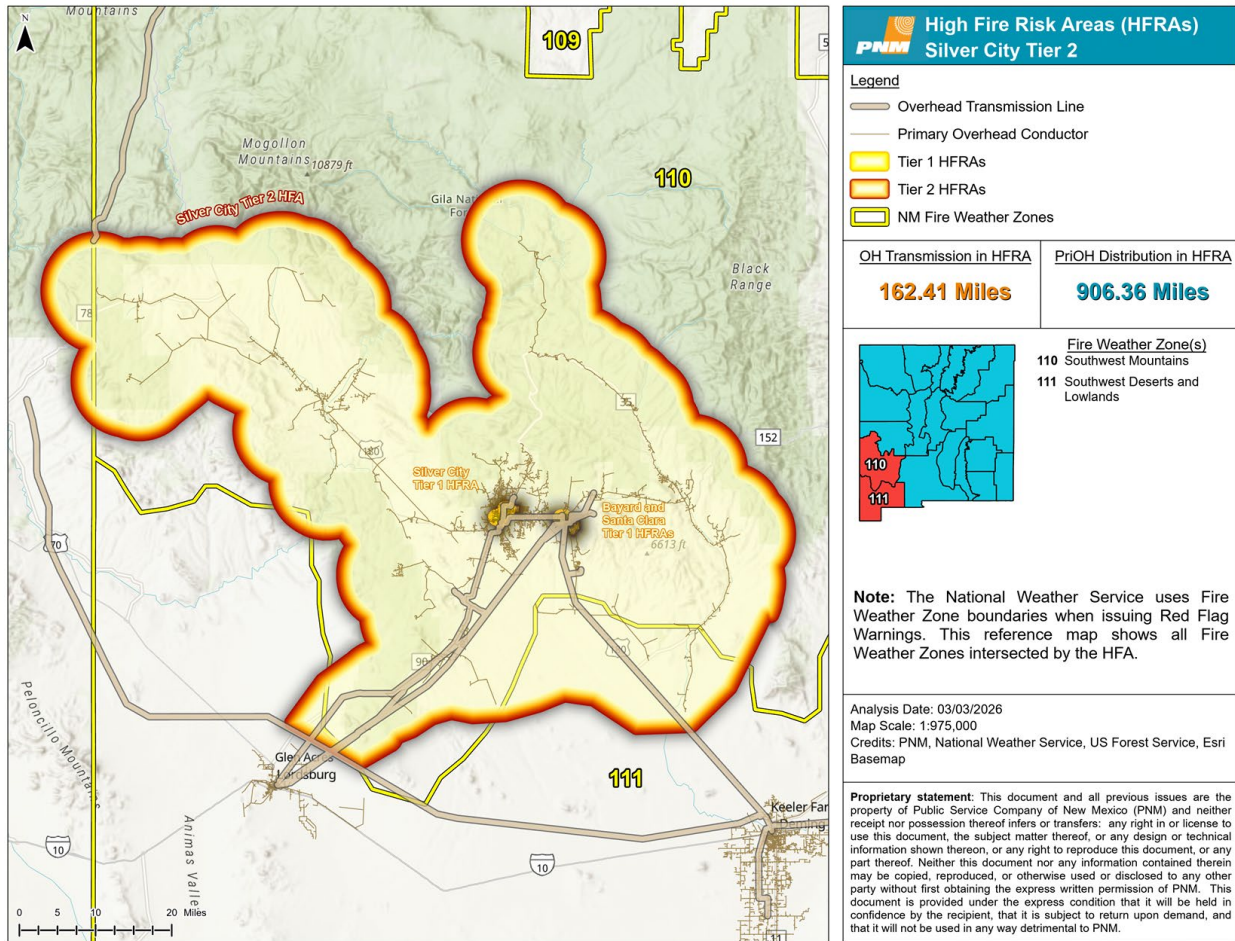


## High Fire Risk Areas (HFRA): Silver City Tier 1



PNM High Fire Risk Areas (HFRA) Silver City Tier 1	
<b>Legend</b> — Overhead Transmission Line — Primary Overhead Conductor ■ Tier 1 HFRA ■ Tier 2 HFRA ■ NM Fire Weather Zones	
<b>OH Transmission in HFRA</b> <b>2.69 Miles</b>	<b>PriOH Distribution in HFRA</b> <b>39.03 Miles</b>
<b>Fire Weather Zone(s)</b> 110 Southwest Mountains	
	
<b>Note:</b> The National Weather Service uses Fire Weather Zone boundaries when issuing Red Flag Warnings. This reference map shows all Fire Weather Zones intersected by the HFA.	
Analysis Date: 03/03/2026 Map Scale: 1:36,000 Credits: PNM, National Weather Service, US Forest Service, Esri Basemap	
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## High Fire Risk Areas (HFRA): Silver City Tier 2



# APPENDIX B

## PNM PSPS PLAN – TECHNICAL GLOSSARY

<b>Term</b>	<b>Definition</b>
After Action Reporting (AAR)	A structured debriefing to assess the effectiveness of an event or plan and identify improvements.
Application Programming Interface (API)	A set of functions that allows software to interact with other software or data sources.
CloudFire	An external vendor providing supplemental SA capabilities.
Composite Risk Index (CRI)	A calculated value combining multiple risk factors to assess wildfire potential.
Crisis Management and Resilience (CMR)	A team focused on handling emergencies and maintaining operational resilience at PNM.
Critical Facilities	Facilities and infrastructure that, due to their function(s), could disrupt vital socioeconomic or public safety activities, or potentially cause bodily harm or property damage if their functionality is impaired. Identification of these facilities is coordinated in consultation with state and local emergency management personnel.
De-energization	The intentional shutdown of electric power to specific portions of the electric grid to reduce the risk of wildfire ignition during extreme weather conditions.
Distribution Assets	The network that delivers electricity from high-voltage transmission lines to consumers at usable voltages.
Distribution Operations Center (DOC)	The hub for monitoring and controlling distribution grid operations.
Emergency Operations Center (EOC)	A central location for coordinating emergency response activities at PNM when threshold criteria are met.
Energy Release Component (ERC)	A fire index estimating the potential energy released per unit area.
Federal Emergency Management Agency (FEMA)	A US government agency responsible for coordinating disaster relief efforts and supporting citizens in preparing for, protecting against, responding to, recovering from, and mitigating all hazards
Field Inspections	On-location patrols of electric assets performed to assess for damages.
Fire Weather Zones (FWZ)	Geographic regions used by the National Weather Service for issuing fire weather alerts.
Geographic Information System (GIS)	A system for mapping and analyzing spatial data.
High Fire Risk Area (HFRA)	Areas identified as having elevated wildfire risk.
Incident Commander (IC)	The person responsible for managing incident operations during an emergency. This person manages the EOC.

Indji Watch (IW)	A situational awareness tool used for monitoring weather and hazard alerts.
Isolation Plan	A coordinated plan to identify points that power can be isolated between in the electric grid.
MET Station	A network of weather monitoring stations providing real-time data to assess fire danger conditions.
National Weather Service (NWS)	A component of the National Oceanic and Atmospheric Administration (NOAA) responsible for providing weather, water, and climate data, forecasts, warnings, and impact-based decision support services to protect life and property, and enhance the national economy.
New Mexico Department of Homeland Security and Emergency Management (NMDHSEM)	A government organization that works to protect the people of New Mexico and the nation through a comprehensive and coordinated program of mitigating hazards, preparing for emergencies, preventing attacks, and recovering from disasters regardless of cause.
New Mexico Operations (NM Ops)	PNM’s operational leadership in New Mexico.
North American Electric Reliability Corporation (NERC)	An organization ensuring reliability of the North American power system.
Power Operations (PWOP)	The operational group at PNM overseeing transmission grid functions.
Public Safety Power Shutoff (PSPS)	Planned power outages to reduce wildfire risk.
Public Service Company of New Mexico (PNM)	A utility company responsible for electricity in many parts of New Mexico.
Red Flag Warning (RFW)	A National Weather Service (NWS) alert issued when weather conditions support extreme wildfire behavior, including high winds, low humidity, and dry fuels.
Restoration Plan	A coordinated plan to safely restore power after an outage or PSPS event.
Senior Vice President (SVP)	An executive leadership role within an organization.
Severe Fire Danger Index (SFDI)	A metric used to estimate the severity of fire danger.
Short Message Service (SMS)	A text messaging protocol used for mobile alerts.
Situational Awareness (SA)	Real-time understanding of events or conditions to inform decision-making.
Special Weather Statement (SWS)	NWS issued alerts for potentially hazardous weather conditions.

Transmission Assets	High-voltage power lines and substations that move bulk electricity from generation facilities to distribution substations.
Transmission & Distribution (T&D)	Electrical infrastructure for moving electricity from generation to consumers.
Unmanned Aerial System (UAS)	Drones used for inspections and monitoring during wildfire events.
United States Forest Service (USFS)	A federal agency that manages public lands and forests.
Wildfire Hazard Potential (WHP)	An index that quantifies the relative potential for wildfire that may be difficult to manage, and is used as a measure to help prioritize where fuel treatments may be needed.
Wildfire Mitigation Plan (WMP)	A utility plan to reduce wildfire risk through operational practices.

# APPENDIX C

## PNM PSPS PLAN – ABOUT

In recent years, the western United States has seen an increase in damaging wildfire activity. Both climatologists and fire scientists predict that fire seasons will become longer and that fire behavior will become more extreme in the coming years.<sup>8</sup> This increased risk will require new coping strategies. Other important risk factors include human encroachment, historical land management practices, and the health of wildlands and forests.

At Public Service Company of New Mexico (PNM), safety is at the heart of everything we do, and it is a core value that also extends to ensuring the safety of our customers and communities. Wildfires pose a significant risk to the safety of our communities, and reducing both the risks and potential impacts of wildfires requires a unified effort from everyone working together.

To address the increasing severity and frequency of extreme weather events and any associated wildfire risk, PNM maintains a Wildfire Mitigation Plan (WMP), which focuses on situational awareness (SA), field personnel safety practices, and operational strategies to prevent accidental ignitions. In conjunction with the WMP, the Public Safety Power Shutoff (PSPS) Plan (hereafter referred to as “the PSPS Plan”) elaborates on the concept of a PSPS and how it is another tool to help ensure the safety of our communities. The PSPS Plan is designed to proactively de-energize electrical facilities in identified areas of extreme wildfire risk to reduce the potential of those electrical facilities becoming a wildfire ignition source or contributing to the spread of wildfires.

The PSPS Plan is part of PNM’s operational mitigation practices and supports customer and community safety. It identifies the relevant considerations, process flow, and implementation protocol before, during, and after a PSPS event. The PSPS Plan is reviewed and updated annually.

Wildfire ‘season’ varies throughout New Mexico, but it is traditionally considered to span from March through October. However, typical wildfire seasons are starting sooner and lasting longer. In New Mexico and other western states, the average wildfire season has lengthened by more than 100 days.<sup>9</sup> Therefore, wildfire potential is year-round, and PSPS may be contemplated and initiated at any time of the year. PNM emphasizes year-round monitoring for wildfire potential, with heightened readiness from March through October.

While burning and wildfire conditions are heightened during certain times of the year, PNM monitors fire potential year-round. Access to each of the five national forests where PNM operates its infrastructure may be restricted at various times when fire conditions develop. PNM has reviewed emerging industry practices to inform the PSPS Plan and has also incorporated local community input.

The key objectives of the PSPS Plan include:

- **Safety:** Ensure the safety of the public and PNM employees, contractors, and Mutual Assistance employees.

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<sup>8</sup> <https://science.nasa.gov/earth/explore/wildfires-and-climate-change/>

<sup>9</sup> <https://earth.org/fire-prone-weather-days-on-the-rise-as-planet-heats-up-study/>

- **Restoration Time:** Minimize the duration of an outage. Safety is the primary focus with an emphasis on Customer Service.
- **Mitigate Consequences:** Provide customer support to mitigate the impact of an outage, including coordination with Emergency Management Agencies to support identification of available community resources.
- **Information:** Provide accurate, timely, meaningful information to our customers, our employees, and other stakeholders.
- **Resources:** Effectively manage human, equipment, labor, material, and information resources to minimize restoration time and maximize productivity and performance.

# APPENDIX D

## **PNM PSPS PLAN – WILDFIRE MITIGATION VEGETATION MANAGEMENT AND INFRASTRUCTURE MAINTENANCE EXPENSE 2025 ANNUAL REPORT**

## WILDFIRE MITIGATION VEGETATION MANAGEMENT AND INFRASTRUCTURE MAINTENANCE EXPENSE 2025 ANNUAL REPORT

### Incremental Wildfire Mitigation Expenses:

Table 1 provides the actual incremental wildfire mitigation expenses for 2024 and 2025.

**Table 1**

<b>Incremental T&amp;D O&amp;M &amp; CAPITAL Expenditures Related to Wildfire Mitigation Plan Activities</b>			
<b>WMP Activity</b>	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>	<b>FERC account</b>
<b>O&amp;M</b>			
Wildfire Mitigation Management - Transmission	\$ 297,827	\$ 207,333	571, Maintenance of overhead lines (Transmission - major);
Wildfire Mitigation Management - Distribution	\$ 718,950	\$ 696,893	593, Maintenance of overhead lines (Distribution - major)
<b>O&amp;M TOTAL</b>	<b>\$ 1,016,777</b>	<b>\$ 904,226</b>	
<b>CAPITAL</b>			
Ignition Detection, Situational Awareness Cameras and Weather Stations - Transmission	Pilot kicked off in 2025	\$ 225,682.45 (pre-tax)	N/A
Ignition Detection, Situational Awareness Cameras and Weather Stations – Distribution	Pilot kicked off in 2025	\$ 683,634.35 (pre-tax)	N/A
<b>CAPITAL TOTAL</b>		<b>\$ 909,316.80</b>	
<b>Total O&amp;M &amp; CAPITAL</b>	<b>\$ 1,016,777</b>	<b>\$ 1,813,542.80</b>	

#### *Remote Data Collection*

Artificial Intelligence (“AI”) Enhanced Data Fusion integrates satellite remote sensing data sources with advanced AI models to predict vegetation related risks and optimize vegetation management strategies.

#### *Whether Transmission and Distribution Facilities are Replaced as a Result of the Mitigation*

PNM conducts field evaluations of facilities to determine resiliency and integrity for future wildfire safe operations. If a facility is deemed to not meet standards, PNM will replace these Transmission and Distribution (“T&D”) facilities as needed. Replacements of these facilities are included in PNM’s capital and expense expenditures.

#### *Resulting Impact of Reducing Wildfire Risks*

PNM has implemented new software that relies on collected satellite imagery and AI to identify hazard trees and vegetation encroaching close to its power lines to optimize vegetation management. PNM further revised its Wildfire Mitigation and Public Safety Power Shutoff plans. PNM also revised its engineering standards for wood poles within Hazardous Fire Areas (“HFRA”) to a structurally stronger and taller poles, wider crossarms, and wrapped all new poles with fire-resilient mesh coatings to improve resiliency and wildfire sustainability.

In 2025, PNM started a pole replacement program of all wood T&D poles that were tested and had defects within its HFRA. All poles with serious defects and immediate need to be replaced have been replaced. PNM has replaced 687 poles identified with minor defects in 2025. Remaining poles will be finished throughout 2026 All the work above will help reduce wildfire risks.

*Enhancing Situational Awareness*

A camera and weather station pilot program kicked off in 2025 to support enhanced situational awareness, wildfire ignition detection, and track hyperlocal weather data. PNM established 66 weather stations and sited 8 ignition detection cameras throughout HFRA on select transmission and distribution poles. See Table 1.

**Vegetation Management Costs:**

Table 2 provides the actual incremental wildfire mitigation expenses for 2024 and 2025, the annual contract, labor and equipment costs related to managing vegetation, and emergency preparedness expenditures as requested by Staff.

**Table 2**

<b>Incremental T&amp;D O&amp;M Expenditures Related to Vegetation Management</b>				
<b>Vegetation Management (VM)</b>	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>	<b>Total O&amp;M 2025</b>	<b>FERC account</b>
Additional Transmission Vegetation	\$ 307,198	\$ 554,422	\$ 819,998	571, Vegetation Management of overhead lines
Additional Distribution Vegetation	\$ 2,799,167	\$ 3,009,030	\$ 5,403,894	593, Vegetation Management of overhead lines
HFRA Distribution Cyclical Vegetation Management Program	Program did not exist in 2024	\$ 1,133,503	\$ 1,133,503	593, Vegetation Management of overhead lines
<b>Total</b>	<b>\$ 3,106,365</b>	<b>\$ 4,696,955</b>	<b>\$ 7,357,395</b>	
<b>Emergency Preparedness Expenditures Related to Vegetation Management</b>				
<b>Vegetation Management (VM)</b>	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>	<b>Description</b>	

Wildfire Response and Recovery and	\$ 2,643,153	\$ 1,075,919	Trout Fire & South Fork Fire VM response
Recovery and Restoration Activities	\$ 2,886,796	\$ 1,528,426	Gila National Forest ROW VM expansion project
<b>Total</b>	\$ 5,529,949	\$ 2,604,345	

*Location of Vegetation Management Activities*

In 2025, PNM prioritized HFRAs as outlined below; vegetation management was also conducted in non-HFRAs throughout New Mexico. PNM uses publicly available USFS Wildfire Hazard Potential (“WHP”) dataset, which ranks hazard potential in five classes ranging from Very Low to Very High and includes each Fire Weather Zone (“FWZ”).

HFRA Name	Type of Facility	Area (Sq. mi.)	FWZ	Predictive service area (PSA) (primary)	PNM Division
Bosque	T&D	29	NM106	SW09 South/Central NM Lowlands	Sandoval Albuquerque Valencia
Clayton East	T&D	13	NM 104	SW13 northeast NM/NW TX	Clayton
Clayton West	T&D	97	NM 104	SW13 northeast NM/NW TX	Clayton
Fort Sumner 3	Transmission	819	NM 125 & 126	SW13 northeast NM/NW TX	Eastern NM
Las Vegas	T&D	135	NM 122 & 123	SW1- Sangre de Christo Mtns	Las Vegas
Mt. Taylor	T&D	298	NM 105	SW07 Northwest NM Mtns	Ambrosia Lake Marquez
Ruidoso	T&D	312	NM 113	SW12 South/Central NM Mountains	Ruidoso
Sandia Mtns	T&D	492	NM 106 & 124	SW11 Central NM Mtns & Plains	East Mountain
Santa Fe	T&D	961	NM 105, 106 & 121	SW10 Sangre de Christo Mtns SW07 Northwest NM Mtns	Santa Fe
Santa Fe East	Transmission	251	NM 124 & 126	SW10 Sangre de Christo Mtns	Santa Fe
Santa Fe North	T&D	704	NM 120 & 121	SW07 Northwest NM Mtns	Santa Fe
Silver City	T&D	2867	NM 110	SW08 White Mtns & Gila Region	Silver City

*Resulting Impact on Reducing Wildfire Risk*

PNM’s Utility Vegetation Management (“UVM”) incorporates Integrated Vegetation Management (“IVM”) principles to reduce wildfire risk and promote ecological health. UVM identifies and mitigates potential ignition sources, decreases available fuels, creates defensible spaces/firebreaks, and improves access for emergency responders.

**Infrastructure Maintenance Expense:**

Tables 3 and 4 provide actual incremental infrastructure maintenance expenses for 2024 and 2025, and the annual costs related to infrastructure maintenance, as requested by Staff.

**Table 3**

<b>Incremental T&amp;D O&amp;M Expenditures Related to Aging T&amp;D Infrastructure Maintenance Activities</b>			
<b>Aging Infrastructure Maintenance Activities</b>	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>	<b>FERC account</b>
Increased Maintenance – Transmission	\$ 146,630	\$ 207,333	563, Overhead line expense (Transmission – major)
Overhead lines – Distribution	\$ 1,604,567	\$ 1,051,728	593, Maintenance of overhead lines (Distribution – major)
Underground lines – Distribution	\$ 2,122,188	\$ 2,354,780	594, Maintenance of underground lines (Distribution – major)
<b>Total</b>	<b>\$ 3,873,385</b>	<b>\$ 3,613,841</b>	

**Table 4**

<b>Total Infrastructure Maintenance Expenditures</b>		
	<b>2024 Expenditure</b>	<b>2025 Expenditure</b>
Maintenance – Transmission	\$ 4,275,038	\$ 2,889,999
Maintenance – Distribution	\$ 11,741,294	\$ 9,931,729
<b>Total</b>	<b>\$ 16,016,332</b>	<b>\$ 12,821,728</b>

*Cause of the Expenditures*

PNM’s efforts include maintaining the Company’s T&D substations to ensure these critical facilities' safe and reliable operation. The number of substations has increased over the last several years due to significant growth. The increased number of substation assets requires additional funding to conduct regular maintenance. Transmission Line expenditures include the costs of staffing, equipment, materials, and supplies needed to inspect, diagnose, and repair or replace transmission assets within PNM’s service territory. This work consists of both planned maintenance activities and emergent work in response to equipment damage or failures.

*How the Costs Resulted in Reducing Wildfire Risks*

PNM’s maintenance and asset management activities contribute to reducing wildfire risks by identifying and mitigating equipment deficiencies that could potentially be ignition sources for wildfires. Line patrols are conducted to identify broken cross arms; failed insulators, cutouts, and lightning arrestors; detached guys; floating conductors; etc. PNM also installs bird guarding on field assets to reduce the chance of birds and critters catching fire and falling to the ground.

*Fires in the State of New Mexico*

Within PNM's service territory, the South Fork and Salt Fires required wildfire response and recovery expenditures. The New Mexico State Forestry Division identified these fires in its 2025

Annual Report. See <https://www.emnrd.nm.gov/wp-content/uploads/EMNRD-2025-AR-final.pdf>. PNM is providing page 14 of the report as Attachment 1.

**Costs Associated with PNM’s Wildfire Mitigation Plan (WMP):**

PNM’s Wildfire Mitigation Plan is reviewed annually prior to wildfire season and revised as needed. The WMP provides information on PNM’s progress and work to date along with advancement toward our mitigation objectives. The Plan covers wildfire risk drivers, programs and strategies to mitigate them. The document is available on [PNM.com/wildfire-safety/](http://PNM.com/wildfire-safety/). (See Attachment 2 to this report). A breakdown of the costs associated with the revisions to the WMP are included in Table 5 and are a subset of costs provided in Table 2.

*The 2025 WMP contains five program elements:*

1. The risk analysis comprehensively assesses wildfire risk throughout the PNM’s geographic information system (GIS) assessment to identify areas with the highest wildfire risk. PNM can use the results to prioritize fire hardening activities, enhance inspection and maintenance activities, implement field work restrictions during critical fire weather and make system operations decisions. The substation assessment required onsite assessments to determine which substations are at highest risk of having an internal equipment fire spread. PNM prioritizes treatments for substations that score highest in its risk assessments.
2. The preventive programs and strategies include vegetation management, outage and ignition management, engineering and technical solutions, implementing design and construction practices, enhanced inspection and maintenance, and system protection from wildfire. These efforts focus on HFRA’s in PNM’s system and are in addition to routine vegetation management conducted on other facilities.
3. The fire weather operating plan implements industry best practices for increasing situational awareness based on meteorological conditions, predictive tools, and monitoring. Improved situational awareness informs operational practices, such as the need to escalate work restrictions or implementing a public safety power shutoff (“PSPS”). PSPS events require close coordination between PNM field operators, dispatchers, state, local and federal agencies and the community at-large.
4. The WMP’s emergency preparedness element includes wildfire response and recovery of wildfire zones.
5. PNM provides support during wildfire incidents by assisting with fire discovery and reporting, as well as developing and applying methods to assess fire risk and communicate fire information effectively.

**Table 5**  
**2025 WILDFIRE MITIGATION PLAN PROGRAM ELEMENTS**

VENDOR / PROJECT	PROGRAM ELEMENTS / DESCRIPTION	2025 O&M COSTS
ACRT	Emergency Preparedness, Preventative Programs & Strategies: Vegetation trimming (proactive and restoration activities)	\$ 104,240.44
Advanced Network Management Inc.	Technology upgrades for emergency operations, virtual meetings	\$ 10,102.00
AI Dash Inc.	Preventative Programs & Strategies, Risk Analysis of HFRAs: AI, Subscription, identification of HFRA-related vegetation trimming planning and maintenance	\$ 435,368.75
Athena	Preventative Programs & Strategies, Risk Analysis of HFRAs: Subscription (3-year), Fire Risk Assessment (Satellite imagery, AI)	Paid in 2024
Clearion	Preventative Programs & Strategies: ESRI based data-mapping	(\$ 39,014.00)
Cloudfire Inc. & Pyrecast	Preventative Programs & Strategies, Risk Analysis of HFRAs, Fire Weather & Operational Strategies: GIS – HFRA layer, Pyrecast subscription, risk assessment, meteorological consulting, situational awareness, PSPS support, HFRA refinement	\$ 254,344.59
Davey Tree Surgery Company	Preventative Programs & Strategies, Emergency Preparedness: Vegetation Management, proactive and responsive vegetation management	\$ 898,514.09
EDM International	Preventative Programs & Strategies: Project Management, Engineering Services, Technical Solutions. Fire Weather & Operational Strategies: Support for (66) weather stations sited throughout HFRAs, situational awareness	\$ 310,960.48
E-Source Companies LLC (IWRMC)	Preventative Programs & Strategies: Subscription – International Wildfire Risk Mitigation Consortium	\$ 48,660.88
Graphics	High Fire Risk Area Maps	\$ 368.08
Indji Systems Inc. (IndjiWatch)	Fire Weather & Operational Strategies: Weather forecasting, Fire, Red Flag Warning, extreme weather alerts, daily situational awareness	\$ 115,485.56
Law Office of Stephen B. Waller LLC	Legal support	\$ 2,131.00
PED LLC	Preventative Programs & Strategies: Engineering services, technical support	\$ 24,326.34
Randy Lyle & Associates LLC	Preventative Programs & Strategies, Risk Analysis of HFRAs, Fire Weather & Operational Strategies: Risk assessment, consulting, situational awareness, PSPS support, substation assessment, training material, fire subject matter expert	\$ 183,341.08
Writers for Hire	Preventative Programs & Strategies: Document creation, formatting	\$ 17,341.97

PNM – PSPS 2026

Cameras	Fire Weather & Operational Strategies: Support for ignition detection cameras. situational awareness	\$ 15,928.13
Weather Stations	Fire Weather & Operational Strategies: Wind Study - Support for siting (66) weather stations sited throughout HFRAs, situational awareness	(\$ 35,837.89)
Customer Support During Wildfire & PSPS Incidents, Proactive Outreach & Education, Recovery	Preventative Programs & Strategies, Emergency Preparedness, Weather & Operational Strategies: Community events, PSPS Support, outreach & recovery - operational activities	\$ 961,764.42
	TOTAL	\$ 3,308,025.92

GCG#535068

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF AN INQUIRY INTO ELECTRIC )  
PUBLIC UTILITIES' VEGETATION MANAGEMENT ) Case No. 22-00154-UT  
PLANS AND PROCEDURES )**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of **Public Service Company of New Mexico's Wildfire Mitigation and Public Safety Power Shutoff Plans** was emailed to parties at the email addresses below on April 1, 2026:

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