BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF SOUTHWESTERN PUBLIC SERVICE
COMPANY FOR REVISION OF ITS RETAIL
ELECTRIC RATES PURSUANT TO ADVICE
NOTICE NO. 272.

SOUTHWESTERN PUBLIC SERVICE
COMPANY,

APPLICANT.

Case No. 17-00255-UT

DIRECT TESTIMONY

OF CHRIS DIZON ON BEHALF OF VOTE SOLAR

APRIL 13, 2018
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I. INTRODUCTION

Q. Please state your name and business address.
A. My name is Chris Dizon. My business address is 866 SW 2001, Andrews, TX 79714.

Q. On whose behalf are you submitting this direct testimony?
A. I am submitting this testimony on behalf of Vote Solar.

Q. By whom are you employed?
A. Endless Energy, LLC. Endless Energy offers residential and commercial solar photovoltaic (“PV”) installations in Texas and New Mexico.

Q. What is your role with Endless Energy?
A. I am the co-founder and co-owner of Endless Energy, LLC. In addition to marketing residential and commercial solar systems in West Texas and Southeast New Mexico, I monitor and assess policy and technology changes that affect the economics and appeal of distributed generation (“DG”).

Q. Please describe your educational and technical background.
A. I am a graduate of the U.S. Navy Nuclear Power Training Command, where I received a nuclear enlisted rating. I served in the U.S. Navy from 1999 to 2007 with the ending rank of Machinist Mate First Class (E6). Between serving in the Navy and forming Endless Energy, I worked as a
control room operator at URENCO, which is a nuclear fuel company that
enriches uranium to provide fuel for nuclear power utilities. I am in the
process of completing a Bachelor of Science degree in Nuclear
Engineering Technology from Excelsior College. I have also completed
North American Board of Certified Energy Practitioners accredited
business and technical course work. I have attached my resume as Exhibit
CD-1.

Q. Please describe your interest in this proceeding.

A. Southwestern Public Service Company (“SPS” or “Company”) has
proposed increasing charges to rooftop solar customers under Rate 59.
The Company’s charges under Rate 59 are already so high that they make
solar uneconomic for many customers and frustrate the growth of my
business. Endless Energy currently employs nine people part-time,
including the owners. I would very much like the ability to have a full-
time staff, but we need more customers to support this.

I recognized the immense potential of solar PV several years ago when I
installed a solar PV system on my home and assisted friends with
installations. Southeast New Mexico has near the highest level of solar
exposure in the country, which should help customers in this region realize
relatively quick returns on an investment in solar. As the solar industry
matured, the most significant economic barrier became high installer
margins due to low volume. My primary motivation for becoming a solar
installer was to lower the economic barrier for solar and allow more
people to benefit from the tremendous solar resource in New Mexico.
Rate 59 works against this goal. It unfairly penalizes people seeking
energy independence, and it has become the most significant economic
barrier hindering homeowners and businesses in Southeast New Mexico
from taking advantage of their most cost-effective source of energy.

Q. Please summarize your testimony.

A. SPS’s Rate 59 is already the most punitive solar fee in the country, as far
as I’m aware, and a strong disincentive to solar PV. My company seeks to
provide affordable access to the abundant solar resources in Southeast
New Mexico. Rate 59 is a real impediment to the adoption of DG in
SPS’s New Mexico service territory.

II. NEGATIVE IMPACT OF RATE 59 ON DEPLOYMENT OF DG
SOLAR

Q. Please describe the economics of the grid-tied systems that Endless
Energy is currently offering.

A. As I mentioned above, making solar a good investment for customers was
my primary motivation for forming a solar installation company. Our
installed cost for a typical residential system is approximately $3/watt. A
typical 8 kilowatt ("kW") system would cost the customer about $24,000 before the federal Investment Tax Credit. After the federal tax credit—which provides a 30 percent tax credit for properties installed before 2019—if customers save $0.089 for each kilowatt-hour ("kWh") they produce, the payback period for a system of this size is about 12.2 years. At 12.2 years, many customers will determine that a solar system is sufficiently cost-effective to justify the investment. If the savings is reduced (and the payback lengthened), very few customers will see the solar system as a reasonable financial investment.

Q. **How does Rate 59 affect the economics of grid-tied systems?**

A. Rate 59 reduces how much customers can save on their electric bills by installing rooftop solar. These savings are important to the customers who are interested in acquiring these systems, as many are on fixed incomes. Under SPS’s current residential rates, the total cost of each kWh purchased from SPS, including the current amount collected through the fuel clause, is approximately $0.084 in winter months and $0.099 in the summer:
Case No. 17-00255-UT
Direct Testimony of Chris Dizon

<table>
<thead>
<tr>
<th></th>
<th>Base</th>
<th>Fuel</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Winter</td>
<td>$0.060120</td>
<td>~$0.024</td>
<td>~$0.08412</td>
</tr>
<tr>
<td>Summer</td>
<td>$0.075319</td>
<td>~$0.024</td>
<td>~$0.099319</td>
</tr>
</tbody>
</table>

*Source: SPS Tariff Nos. 1018.17 and 7107.2.*

Over the course of the year, this averages to about $0.089/kWh.\(^1\)

If Rate 59 did not exist, the benefit of installing a solar system would be the ability to avoid purchasing kWhs from SPS at about $0.089 for each kWh provided by self-generation, via net metering.\(^2\) As I stated above, this would be sufficient to make investing in solar DG a reasonable choice for many customers. However, Rate 59 does exist and is charged currently at around $0.0366/kWh to residential customers with solar PV.

In this proceeding, SPS proposes increasing Rate 59 to an approximately $0.041/kWh usage charge on residential customers with rooftop solar. Imposing this fee on customers paying $0.089/kWh for energy would decrease the savings from self-generation to about $0.048/kWh. This increases the payback period for buying rooftop solar from about 12.2

\(^1\) Weighted for solar production of a South facing array at 180S with a 30-degree tilt.

\(^2\) Although SPS once offered an incentive for DG customers to produce Renewable Energy Credits (“RECs”) through its Solar*Rewards program, SPS no longer offers a REC incentive to new DG customers.
years to about 22.6 years, an approximate 85% increase. I suspect very few customers who would invest in rooftop solar if they knew it would take over 20 years to recoup their investment.

Q: **Are the economics of solar DG in SPS’s service territory better if the project is financed through a lease or loan?**

A: The adverse impact on my customers’ ability to recover the cost of their investment is even more pronounced for leases and loans. With falling system prices, we’re getting close to the point that a system could pay for itself on day one, absent the Rate 59 surcharge. In other words, lease or financing payments could be 100 percent covered by on-bill savings. This would open up new opportunities for middle-income people to go solar even if they don’t have cash on hand for a solar installation. It is my understanding that this has already occurred in the Public Service Company of New Mexico’s service territory. However, Rate 59 pushes these efficient financial structures into the red, turning economic investments uneconomic. With Rate 59 in place, I am not aware of any favorable leasing arrangements for rooftop solar installations in SPS territory.

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3 At current levels, Rate 59 extends the payback period for buying rooftop solar from about 12.2 years to about 20.8 years.
Q. Please describe typical DG customer demographics.

A. Contrary to what some critics would like you to believe, many DG owners are not wealthy people looking for “ecobling.” They are a cross-section of customers, including many of modest means or on fixed incomes. My customer base is mostly residential customers in Texas. My customers are generally seeking to help control their electric bills because they do not have much money to spare.

Recently, I met a woman near where I live in Eunice, New Mexico, who purchased solar to save money. She works as a police dispatcher and her husband is on disability. Rate 59 is a major burden for her. My mother purchased solar to have more income stability in retirement. She was a nurse, not a hedge fund manager. She’s lucky enough to live in Washington State, where she actually saves more with solar than she would in New Mexico, even with its cloudy weather, since Puget Sound Energy doesn’t tax the sun. The only common denominator to DG owners is homeownership. In my experience, a lot of people who own homes are not wealthy, especially in rural areas of the State.

Q. How does Rate 59 affect your business?

A. The best salesperson for new PV systems is a current PV owner. Rate 59 has had a dramatic negative effect on word-of-mouth sales. I’ve spoken to
a few DG owners who purchased their systems after the incentives in the Solar*Rewards program ran out. None of them are happy with their investment because of the effect of Rate 59 charges. In my opinion, any friend or coworker of these people who may have been considering a solar investment will be quickly dissuaded from investing in rooftop solar if they understand the impact of Rate 59 on their investment.

Endless Energy was formed to serve the solar DG market in West Texas and Southeast New Mexico. I live in Eunice, New Mexico, and our business office is about 35 miles away in Andrews, Texas. Our initial plan was that about half of our business would be in each state. However, because of Rate 59 in New Mexico, it did not work out that way. Our business model is predicated on promoting solar as an investment. Rate 59 has altered the economics of DG in such a way that we cannot in good faith promote DG as an investment in SPS service territory. Promoting DG under Rate 59 is likely to do more harm than good by perpetuating the myth that solar is still not cost-effective. Since we also serve Texas, we have made the business decision to not expend marketing resources in New Mexico. This has reduced our pool of potential customers by approximately 50 percent.
Q. **If Rate 59 undermines the economics of DG, why are a few new DG systems still being installed in SPS’s New Mexico service territory?**

A. DG customers have told me several reasons for this. Customers may not fully understand Rate 59 or its impact. I’ve discovered multiple instances of new DG owners completely unaware of the rider, who believe that their electric bills remain high because their systems are underperforming. In other cases, some DG owners possess the skill to self-install. Even with the poor economics under Rate 59, a self-installed system can be cost-effective, and the systems will still pay for themselves eventually. In other cases, some people will choose solar for environmental and self-sufficiency reasons.

Q. **Do other utilities have similar charges applied only to rooftop solar systems?**

A. Yes, a few. Fees on customer investments in solar are often proposed by other utilities, although Arizona Public Service Company is the only regulated utility that I’m aware of that currently imposes such a charge. Rate 59 is by far the most punitive rider I am aware of in the entire country. By comparison, in Arizona Public Service Company’s service
territory, an 8 kW system would incur a monthly fee of $7.44. Under Rate 59, the average monthly charge for that 8 kW system is about $48—about 650% more. While Rate 59 devastates my ability to do business with residential and small commercial customers in SPS territory and to bring jobs to Southeast New Mexico, Arizona Public Service Company’s fee is not steep enough to completely disrupt the economics of rooftop solar. Of course, in the majority of states, there is no utility fee at all for investing in self-generation.

Q. You mentioned that your company also operates in Texas. Please explain how the economics of DG compare in Texas and New Mexico.

A. It has been said that regulation is a poor substitute for competition. Texas appears to provide a good example of this in terms of DG. It’s ironic that while New Mexico has a net-metering law protecting DG, SPS has made the market for DG in its New Mexico service territory far less favorable than in Texas. In Texas, there are dozens of Residential Service Providers (“RSPs”) that ratepayers may choose from. If your RSP offers unfavorable terms for your DG system, you are free to find a better one.

All of the projects we have completed in Texas have full net metering

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without a standby rider. As a result, the return on investment for rooftop solar in Texas is approximately twice what it is in SPS territory under Rate 59.\(^5\) I am also aware of some Texas DG owners who can carry excess energy credits month-to-month at the full retail rate, which is another perk that SPS customers lack.

**Q.** Does Rate 59 provide any incentives for DG customers to provide ancillary and standby services or to reduce SPS’s costs of service?

**A.** No, even though DG is capable of providing ancillary and standby services. Watching the progress of technology in the solar industry over the last five years has been remarkable. As Mr. Rick Gilliam explains in his testimony, inverter-based generators are capable of offering an assortment of ancillary services. Battery-backed, grid-tied inverters are also now readily available, giving customers new options for controlling the amount and timing of the demand they place on the grid. Rate 59 is completely unavoidable and doesn’t give customers the opportunity to benefit from equipment capable of providing ancillary or standby services.

**Q.** Has grid defection become a cost-effective alternative under Rate 59?

\(^5\) Residential customers of the RSP Reliant in Texas will see savings from their DG solar production of $0.117/kWh, whereas residential customers of SPS in New Mexico see savings of $0.052/kWh of DG production.
A. The payback period for the required batteries and generator backup will soon be better than the payback period of grid-tied solar under Rate 59. To illustrate with approximate numbers, a typical residential 8 kW grid-tied system could incur over $9,000 in SPS standby fees over a 16-year period if the Company maintains Rate 59 at current levels. These fees have been rising consistently and effectively establish the threshold cost of batteries on a purely economic basis. If sufficient battery storage can be acquired for less than $9,000, grid defection can become a reality. Based on my observations of the rapidly declining cost of storage and battery-backed inverters I expect this point to occur in the next two to four years.  

Rate 59 makes grid defection cost-effective because the standby fees apply to all DG usage, whether immediate or deferred through exports. Customers pay for their grid-supplied electricity once regardless of how much or how little they use, and how much it may change from month to month. Meanwhile, they pay for their self-generated and self-consumed electricity twice—once for the equipment and again in a surcharge to the utility. It’s not right.

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6 A Tesla Powerwall with 13.5 kWh of storage and integrated 5 kW inverter is currently available for approximately $6,600. See Tesla, Powerwall, https://www.tesla.com/powerwall (last visited Apr. 12, 2018).
Q. Do you see any other regulatory or policy barriers hindering DG growth in SPS service territory?

A. Yes. There are certain portions of Rate 52 that appear to be an anachronism from when SPS offered incentives through the Solar*Rewards program. Specifically, there is no longer a justification for limiting DG production for new systems to 120 percent of annual (past 12 months only) consumption for that location. I believe that most customers would voluntarily follow this limit because an over-sized system is less cost-effective than a right-sized system. However, this is a decision that should be left up to the customer. If consumption over the previous 12 months was abnormally low, the system size will be unnecessarily constrained. Some customers may also make the decision to over-produce for personal reasons. I am aware of one instance where a SPS customer was required to hire an engineer to perform an energy analysis on the home he was building to get his DG system approved. This places an unnecessary burden on DG customers. Since SPS purchases net excess energy at a low avoided cost rate, there should be no fiscal reason for utility opposition. SPS gets an incredible deal on DG customers’ net excess energy; the price SPS pays for DG customers’ net excess energy is

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7 I use the term “right-sized” to mean a system whose generation is equivalent to the customer’s consumption.
based on the average Southwest Power Pool Locational Marginal Price data from every hour in the month, which is probably below the market price when solar PV generates.\(^8\)

The interconnection process is also much less efficient than it should be. There are several steps involved in the process including the application, system installation, inspection, and meter installation. It should be possible to perform some of these steps in parallel. For instance, the Company could order the meter when the customer submits his or her interconnection application. However, this is not currently the case. SPS requires all steps to happen sequentially, which adds a significant delay to the process. Currently, DG customers must wait several weeks or months with an idle system—even after the complete system has been inspected—while SPS waits for meters.

III. SOLAR PRODUCTION DATA

Q: Have you reviewed the Direct Testimony of Evan D. Evans on how Rates 59 and 67 are calculated?

A: Yes.

Q: Do you have any observations?

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\(^8\) See SPS’s Response to Question No. VS 5-7, attached as Exhibit CD-2.
A: Yes. Although I am not an expert on utility rate setting, based on my own direct experience with solar PV systems in the SPS service territory, it appears that one of the inputs Mr. Evans uses in his calculations in Attachment EDE-6—the output from 1 kW-AC of PV panels at four selected hours on four days in 2016 and 2017—is not consistent with actual system production.

Exhibit CD-3, attached, is the daily production curve from a 15.7 kW system installed in Andrews, Texas, and a 9.6 kW system in Roswell, NM, on the four days in Attachment EDE-6. For the Texas system, I converted the data to the Mountain Time Zone. For both systems, I then looked at the production for the specific hours in Mr. Evans’s exhibit. In each case, the output in watts per kW of installed solar was significantly higher than the numbers in Attachment EDE-6:

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<th>Date</th>
<th>4CP 16:00 MDT</th>
<th>EDE-6 (1 kW-AC)</th>
<th>Andrews 220SW (1 kW-AC)</th>
<th>Roswell 180S (1 kW-AC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>July 13, 2016</td>
<td>204.91w</td>
<td>702.4w</td>
<td>537.5w</td>
<td></td>
</tr>
<tr>
<td>August 2, 2016</td>
<td>304.35w</td>
<td>692.2w</td>
<td>160.4w</td>
<td></td>
</tr>
<tr>
<td>September 9, 2016</td>
<td>177.61w</td>
<td>682.0w</td>
<td>524.0w</td>
<td></td>
</tr>
<tr>
<td>June 21, 2017</td>
<td>107.52w</td>
<td>687.7w</td>
<td>655.2w</td>
<td></td>
</tr>
</tbody>
</table>
IV. CONCLUSION

Q. What do you recommend?

A. I recommend Rate 59 be withdrawn, and that the Commission should not consider reinstating it in any form until a full cost-benefit analysis is performed.

In addition, the 120 percent rule of Rate 52 should be rescinded because it creates an unnecessary administrative hurdle. Finally, the interconnection process needs to be streamlined, with a time limit of 30 days for SPS’s portion from application to meter installation and 10 days from inspection to meter installation.

Q: Does this conclude your testimony?

A: Yes.
Exhibit CD-1
Areas of Expertise


Professional Experience

Endless Energy, LLC, Andrews, TX

Vice President, Policy and Technology

May 2017 – Present

- Assist in system design and integration.
- Research product trends.
- Monitor policies influencing distributed generation economics.
- PV Grid-Tie interconnection.

URENCO USA, Eunice, NM

Control Room Operator

2015 – April 2017

- Remotely monitored operation of plant equipment.
- Responsible for oversight of all maintenance and operational activities.
- Responded to all abnormal events and directed action in the field.

Commissioning and Acceptance Technician

2012 – 2015

- Ensured vendor-installed equipment met all required specifications.
- Developed and implemented commissioning tests.
- Calibrated control valves and transducers.
- Tested plant control system integration.
- Verified plant control system performance.
- Supervised placing new equipment into production.
- Developed procedures for operational use.

Building Operator

January 2009 – 2012

- Performed daily rounds and tours.
- Technical Systems Expert.
- Performed plant evolutions as required.
- Served on Fire Brigade including HAZMAT response.
- Reviewed procedure revisions and developed improvements.

United States Navy, USS Carl Vinson

Nuclear Machinist

July 1999 – August 2007

Department Repair Parts Supervisor

- Created start-up infrastructure and operational processes pertaining to parts procurement for the department during Reactor Complex Overhaul.
- Researched required parts for specific maintenance items and ensured timely ordering.
- Evaluated lessons learned and assisted in the creation of a real-time parts status-tracking program for the department.
- Tracked department consumable budget.
- Trained and supervised twelve divisional Recruit Chief Petty Officers in repair parts procurement and management tools.
Chief Machinery Operator
- Supervised operation of A4W propulsion plant.
- Directed housekeeping efforts in the propulsion plant.
- Supervised in-plant maintenance activities during plant operation.

Work Center Supervisor, Reactor Propulsion Damage Control Division
- Prepared maintenance schedules and verified completion to ensure proper operation of all Damage Control and Safety Equipment.
- Spearheaded the Material Condition Assessment Program, meticulously tracked numerous material deficiencies, and ensured timely repair and documentation of discrepancies.

Divisional Safety/Damage Control Petty Officer
- Controlled all hazardous waste for Main Machinery Room work center.
- Received Admirals Letter of Commendation for the excellent condition of Main Machinery Room self-contained breathing apparatuses, eyewash stations, fire-fighting equipment, escape hatches and emergency lighting.

Maintenance Man
- Repaired and performed preventative maintenance on Main Machinery Room equipment.
- Qualified Steam Plant Cleanliness inspector for work on Level 1 components.
- Researched, reviewed, and carried out equipment tag-outs.

Education and Training
North American Board of Certified Energy Practitioners, Business and Technical Sales, Austin, TX (online coursework, 2017).
U.S. Navy Machinist Mate A School, Goose Creek, SC (1999).

References
References are available upon request.
Exhibit CD-2
QUESTION NO. VS 5-7:

Refer to SPS’s response to Question No. Vote Solar 3-16(a). When SPS calculates the “monthly LMP for the node closest to the DG customer’s premise,” is the Company averaging data from every hour in the month or just the times of day when the solar system is producing?

RESPONSE:

SPS averages Southwest Power Pool LMP data from every hour in the month to calculate excess generation payments to DG customers. SPS’s DG customers do not have meters that record hourly output from the customer’s DG system or inflows from SPS. In addition, SPS effectively pays the retail rate to the customer when inflows from SPS are reversed for billing by DG delivered to SPS at other times.

Preparer: Jeff Comer
Sponsors: Evan D. Evans, Richard M. Luth
Exhibit CD-3
The following data is from an array in Roswell, NM. It’s a 9.6kW array facing 180 degrees S.

<table>
<thead>
<tr>
<th>4CP Date</th>
<th>1kW Output</th>
</tr>
</thead>
<tbody>
<tr>
<td>July 13, 2016</td>
<td>537.5w</td>
</tr>
<tr>
<td>August 2, 2016</td>
<td>160.4w</td>
</tr>
<tr>
<td>September 9, 2016</td>
<td>524.0w</td>
</tr>
<tr>
<td>June 21, 2017</td>
<td>655.2w</td>
</tr>
</tbody>
</table>
The following data is from an array in Andrews, TX. It’s a 15.6kW array facing ~220 degrees SW with a tilt of 30 degrees.

<table>
<thead>
<tr>
<th>4CP Date</th>
<th>1kW Output</th>
</tr>
</thead>
<tbody>
<tr>
<td>July 13, 2016</td>
<td>702.4w</td>
</tr>
<tr>
<td>August 2, 2016</td>
<td>692.2w</td>
</tr>
<tr>
<td>September 9, 2016</td>
<td>682.0w</td>
</tr>
<tr>
<td>June 21, 2017</td>
<td>687.7w</td>
</tr>
</tbody>
</table>
VERIFICATION

STATE OF NEW MEXICO )
COUNTY OF LEA )

CHRIS DIZON, first being sworn on his oath, states:

I am the witness identified in the preceding direct testimony. I have read the direct testimony and am familiar with the contents. Based upon my personal knowledge, the facts stated in the direct testimony are true. In addition, in my judgment and based upon my professional experience, the opinions and conclusions stated in the direct testimony are true, valid, and accurate.

CHRIS DIZON

SUBSCRIBED AND SWORN TO before me on this 5 day of April, 2018 by CHRIS DIZON.

Notary Public, State of New Mexico
My Commission Expires: 07-16-2020
BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE APPLICATION OF
SOUTHWESTERN PUBLIC SERVICE
COMPANY FOR REVISION OF ITS RETAIL
ELECTRIC RATES PURSUANT TO ADVICE
NOTICE NO. 272.

Case No. 17-00255-UT

SOUTHWESTERN PUBLIC SERVICE
COMPANY, APPLICANT

CERTIFICATE OF SERVICE

I CERTIFY that on this day I caused to be served the Direct Testimony of Chris Dizon on Behalf of Vote Solar to the parties and other individuals listed below.

Stephen Fogel
Jeffrey L. Fornaciari
Dana S. Hardy
Evan Evans
Mario A. Contreras
William Grant
Linda Hudgins
Amy Shellhamer
Sonya Mares
Casey Settles
Brian J. Haverty
Thomas M. Domme
Rebecca A. Carter
Nicole V. Strauser
Anthony Trujillo
Phillip Oldham
Katherine Coleman
Katelyn Hart
Melissa Trevino
Kitty Turner
Kellie Barahona
Jason Marks
Sara Gersen
Charles Carter Hall
Al Luna
Nick Thorpe
Rick Gilliam
Jill Tauber
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Stephen Fischmann

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Danyel Mayer
Tony A. Gurule
Joan Drake
Perry Robinson
Deana M. Bennett
Sally Wilhelm
Mike Gorman
Amanda Alderson
Chris Walters
Chris Dizon
Ruben Lopez
Julia Broggi
Frederick Schmidt
David A. Rueschhoff
Thorvald A. Nelson
Michelle Brandt King
Nikolas Stoffel
Matthew H. Marchant
Greg Wright
Greg Tutak, P.E.
Caren Adkins
Karon E. Corner
Ruth Sougstad
Daniel A. Najjar
Carla R. Najjar
Chuck Pinson
Antonio Sanchez Jr.
John Caldwell
Maj. Andrew J. Unsicker
Mr. Thomas Jeremiah
Capt. Lanny Zieman
Capt. Natalie Cepak
Ms. Ebony Payton
TSgt Ryan Moore
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d rueschhoff@hollandhart.com;
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CAdkins@hollandhart.com;
kecorner@hollandhart.com;
rsougstad@hollandhart.com;
dnajjar@virtuclaw.com;
e Sajjar@virtuclaw.com;
epinson@ecovec.org;
sanchez@reec coop.com;
Jcaldwell@leacounty.net;
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Thomas.Jeremiah.3@us af.mil;
Lanny.Zieman.1@us af.mil;
Natalie.Cepak.2@us af.mil;
Fbony.Payton.ctr@us af.mil;
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jcp@ipollockinc.com;
Bradford.Borman@state nm.us;
john.reynolds@state nm.us;
charles.gunter@state nm.us;
Dated this 13 day of April 2018.

Jason Marks
1011 Third Street NW
Albuquerque, NM 87102

Attorney for Vote Solar