

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE JOINT APPLICATION	)	
FOR APPROVAL TO ACQUIRE	)	
NEW MEXICO GAS COMPANY, INC.	)	
BY SATURN UTILITIES HOLDCO, LLC.	)	Docket No. 24-00266-UT
	)	
JOINT APPLICANTS	)	

REBUTTAL TESTIMONY AND EXHIBITS

OF

RYAN A. SHELL

May 16, 2025

NMPRC CASE NO. 24-00266-UT

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REBUTTAL TESTIMONY OF
RYAN A. SHELL**

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**REBUTTAL TESTIMONY
OF
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I. INTRODUCTION AND PURPOSE

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.

A. My name is Ryan A. Shell. My business address is 7120 Wyoming, Albuquerque, New Mexico 87109. I am the President of New Mexico Gas Company (“NMGC” or the “Company”).

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed Direct Testimony in this case on October 28, 2024.

Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?

A. In this Rebuttal Testimony I will respond to the testimony of various intervenor witnesses in the areas covered by my Direct Testimony in this case.

II. COMMITMENTS AND BENEFITS OF TRANSACTION

Q. MR. BAUDIER IN HIS REBUTTAL TESTIMONY DESCRIBES ADDITIONAL COMMITMENTS OFFERED IN RESPONSE TO TESTIMONY OF THE STAFF AND INTERVENORS AS NECESSARY OR DESIREABLE FOR APPROVAL OF THE TRANSACTION. ONE OF THE COMMITMENTS IDENTIFIED BY MR. BAUDIER IS AN AGREEMENT BY EMERA AND SATURN HOLDCO TO EXTEND THE TERM OF THE TRANSITION SERVICES AGREEMENT TO A FULL 24 MONTHS FROM THE PROPOSAL IN THE APPLICATION. DO YOU SUPPORT THIS?

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1 **A.** Yes. This is a positive enhancement to the Transition Services Agreement (“TSA”). The
2 TSA was always contemplated as a vehicle to ensure that the shift from one owner to the
3 next was seamless and efficiently implemented. By extending the TSA to 24 months, from
4 12 months extendable to 18 months, it gives me confidence that we can hire the appropriate
5 personnel and transition smoothly and without potential impact on customers. I am pleased
6 an agreement extending the TSA is now in place, and I look forward to working with Emera
7 and Saturn Holdco to ensure the smooth transition of back-office services to New Mexico
8 or to third parties during the term of the Transition Services Agreement, as extended.

9
10 **Q.** **ANOTHER OF THE BENEFITS MR. BAUDIER POINTS TO IN RESPONSE TO**
11 **THE INTERVENOR TESTIMONY IN THIS CASE, IS THE COMMITMENT TO**
12 **DELAY FILING NMGC’S NEXT ANTICIPATED RATE CASE BY ONE YEAR TO**
13 **LATE 2026. DO YOU SUPPORT THIS COMMITMENT AND ARE YOU ABLE TO**
14 **PLACE VALUE ON THIS ONE-YEAR DELAY IN FILING A RATE CASE?**

15 **A.** Yes, I support the commitment and I can provide an estimated value on a delay of one year
16 in filing a rate case. First, the delay in filing a rate case results in benefits to ratepayers
17 from not having to pay increased rates as currently planned. NMGC has been planning to
18 file a rate case in September or December of 2025, for new rates effective on or about
19 October 1, 2026 or January 1, 2027. Mr. Baudier’s commitment to delay filing a rate case
20 means NMGC will delay filing its rate case to no earlier than September 2026, for new
21 rates effective no earlier than October 2027. This one-year delay can be valued by
22 determining, albeit not to the degree of accuracy one would have if the rate case was fully

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1 prepared, what the anticipated amount of the rate request would be. Based on current
2 forecasts, NMGC anticipates that an NMGC rate case would be filed in September or
3 December 2025. A conservative value of the rate case stay out is approximately \$30 - \$40
4 million. These savings would be realized by customers primarily during the year 2027.

5
6 **Q. NEE PROPOSED A CONDITION THAT NMGC'S NEXT RATE CASE SHOULD**
7 **BE BASED ON A HISTORICAL YEAR INSTEAD OF A FUTURE TEST YEAR.**
8 **SHOULD THIS CONDITION BE ADOPTED?**

9 **A.** No. Although making the suggestion, NEE's witness Sandberg cannot estimate any benefit
10 from the use of a historical test year versus a future test year. This recommendation appears
11 to be a vestige from the Emera/TECO merger. At the time the Emera/TECO case was
12 decided, New Mexico law had only recently been changed to allow for use of future test
13 year and parties were unfamiliar with and wary of the use of a future test year. Since that
14 time, the use of a future test year in setting utility rates is now commonplace. A future test
15 year is most appropriate because it considers the actual costs for the utility needed to
16 operate during the period the rates are in effect. NEE's proposed condition requiring the
17 use of a historic test year in NMGC's next rate case should be rejected.

18
19 **III. NMGC OPERATIONS AND PERFORMANCE METRICS**

20 **Q. IN HIS TESTIMONY, MR. GARRETT ANSWERS THE QUESTION "WILL**
21 **NMGC MANAGEMENT AFTER THE ACQUISITION HAVE SUFFICIENT**

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1 **NATURAL GAS UTILITY EXPERIENCE?” AS FOLLOWS: “NO. GOING**
2 **FORWARD, NMGC WILL HAVE OPERATIONAL MANAGEMENT WITH GAS**
3 **UTILITY EXPERIENCE, BUT IT WILL NOT HAVE SUPPORT AT THE PARENT**
4 **LEVEL OF EXECUTIVE MANAGEMENT WITH NATURAL GAS UTILITY**
5 **EXPERIENCE. NMGC’S CURRENT LOCAL MANAGEMENT ... WILL BE**
6 **STAYING ON BOARD ... BUT THE EXECUTIVE MANAGEMENT AT THE**
7 **EMERA/TECO LEVEL WILL ALL BE GONE AND WILL NOT BE**
8 **REPLACED WITH EXECUTIVE MANAGEMENT WITH ANY GAS UTILITY**
9 **EXPERIENCE.” 25/13 – 26/8. WHAT IS YOUR RESPONSE TO THIS Q AND**
10 **A?**

11 **A.** I would start by saying that I’m not sure what Mr. Garrett bases his opinion upon, as he has
12 never observed my team or NMGC’s operations and has never participated in any NMGC
13 rate cases or other cases before the NMPRC. From an operational perspective of providing
14 safe, reliable service to customers, NMGC already operates essentially as a stand-alone
15 utility with oversight by its local board of directors and with the provision of back office
16 shared services by affiliated companies. Local management makes all operational
17 decisions in New Mexico, subject to review by the NMGC board of directors. While we
18 sometimes consult with management in Nova Scotia and in Tampa and they likewise
19 consult with us, for information and discussion purposes, decisions are made locally based
20 on the unique environment in New Mexico. While it is true that executive management at
21 Emera/TECO will no longer be accessible to NMGC, I am not concerned about our ability
22 to continue operating the business. First, because NMGC’s local management is strong

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1 and already self-sufficient, and second because of what I've learned from the BCP
2 Applicants. From my discussions with the BCP Applicants, my understanding of the bench
3 strength at Delta Utilities which will become an affiliate of NMGC as a result of the
4 transaction, and my understanding of the gas utility experience of the two new members of
5 the NMGC Board as currently proposed by Saturn Holdco, the support and executive
6 backup that we will receive under new ownership appears to be readily comparable to the
7 structure under which we have been successfully serving customers and operating the
8 business over the last decade. I might add that presently Emera is seeking to sell NMGC
9 whereas Saturn Holdco is seeking to buy NMGC. This is something I believe is important.
10 As the President of NMGC, I have evaluated what I have learned about Saturn Holdco that
11 is seeking to acquire us, and I believe that NMGC can succeed under this new ownership
12 structure just as we have under current and prior structures.

13
14 **Q. MR. SANDBERG STATES IN HIS TESTIMONY THAT UNDER PRIVATE**
15 **EQUITY OWNERSHIP "THERE WILL BE ... INCENTIVES TO CUT COSTS**
16 **THROUGH REDUCED STAFFING, TO MOVING EXPENSES AWAY FROM**
17 **OPERATIONS INTO AREAS WHICH PAD OTHER JOINT APPLICANTS'**
18 **AFFILATES BOTTOM LINES. ANY OF THOSE CHANGES WOULD DIRECTLY**
19 **AND NEGATIVELY IMPACT THE COSTS, SAFETY, RELIABILITY, AND**
20 **LONGEVITY OF NMGC'S OPERATIONS." WHAT IS YOUR RESPONSE TO**
21 **THIS STATEMENT?**

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1 **A.** I don't agree with this statement. As indicated above, under Emera ownership, and as
2 committed to by Saturn Holdco in the Joint Application and testimony of Mr. Baudier, local
3 control and management of NMGC's operations will remain with NMGC's local
4 management team. I can therefore speak authoritatively about NMGC's commitment to
5 maintaining performance metrics as they have existed. Simply put, NMGC is a great
6 utility, and NMGC's proposed ownership group is committed to maintaining the existing
7 performance metrics that make NMGC excellent.

8
9 **Q. PLEASE DESCRIBE THESE PERFORMANCE METRICS.**

10 **A.** NMGC's performance metrics include the following:

- 11 • First, as described in response to the discovery in this case, NMGC has filed its
12 2010-2012 quality of service reports in 2010 and 2012 in case No. 09-00163-UT,
13 and has filed its quality-of-service reports for every year since 2014 in the NMPRC
14 docket for Case No. 13-00231-UT. These reports for the years 2010-2012 and
15 2014-2024 are attached to as JA Exhibit RAS-1 (Rebuttal).
- 16 • Second, in addition to these customer service metrics, NMGC's operations
17 department operates under standards for customer engagement, leak detection and
18 work inspection which meet or exceed operations standards in the industry. If
19 operations are mandated, these mandated standards apply regardless of who the
20 owner is. If operations are above mandated standards, these standards of operation
21 will continue regardless of who is the owner of NMGC. These operations programs
22 include but are not limited to:

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- 1 ○ Company inspection of 100% of contractor-performed work. This is not
2 mandated but is company-initiated to enhance quality and safety.
- 3 ○ A pressure check program for each meter on the system that is based on the
4 pressure associated with each meter. This program is monitored and
5 approved by the NMPRC.
- 6 ○ An atmospheric corrosion program that is monitored and approved by the
7 NMPRC for each and every meter on the system.
- 8 ○ An NMGC-initiated program for detection and repair of leaks, which
9 program is above and beyond industry standards and reduces emissions
10 from NMGC's system.
- 11 ○ An anti-tampering initiative which enhances safety throughout the system
12 and limits gas theft.
- 13 ○ An enhanced system for tracking third-party damage to NMGC's system
14 which limits damage and loss, helps control contractor activity, and
15 enhances safety and improves service.
- 16 ○ An Advanced Mobile Leak Detection (AMLDD) program that will be
17 statewide by 2026 which is cutting edge, reduces leaks and leak effects,
18 reduces methane emissions, and enhances customer safety.
- 19 ○ A system for aerial survey of transmission lines that reduces leak emissions
20 and enhances customer safety.

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- 1 ○ Engagement with fire departments and first responders throughout the State
2 for enhanced education about natural gas and first responder response to gas
3 related emergencies.

4
5 **Q. NEE RECOMMENDS THAT THE NMPRC ASSESS AUTOMATIC PENALTIES IF**
6 **NMGC’S SERVICE QUALITY DETERIORATES AFTER THE TRANSACTION**
7 **IS COMPLETED. DO YOU SUPPORT THIS RECOMMENDATION?**

8 **A.** No, I don’t think this condition should be adopted. NMGC works well within the
9 regulatory framework currently in place in New Mexico, which does not provide for
10 automatic penalties for failure to meet quality and service standards worked out between
11 NMGC and Staff and other parties. Such a collaborative process has resulted in service
12 standards like those set forth above. NMGC has not needed and does not need the threat
13 of automatically imposed penalties to provide exceptional service to its customers in New
14 Mexico even if they are sometimes utilized in other jurisdictions.

15
16 **Q. WRA WITNESS CEBULKO PROPOSES ON PAGES 45-47 OF HIS TESTIMONY**
17 **THAT NMGC PROVIDE FINANCIAL DISCLOSURES TO THE REGULATOR**
18 **AND THE PUBLIC “EQUIVILENT AS THOSE REQUIRED BY PUBLICLY HELD**
19 **COMPANIES” INCLUDING 10-KS AND 10-QS, AND “ON THE SAME CADENCE**
20 **AS PUBLICLY HELD COMPANYIES”, AND THAT NMGC BE HELD TO THE**
21 **SAME RULES APPLICABLE TO NEW YORK STOCK EXCHANGE**
22 **CORPORATE GOVERNANCE STANDARDS AND SEVERAL SECTIONS OF**

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1 **THE SARBANES-OXLEY ACT. WHAT IS YOUR POSITION ON THIS, AND**
2 **DOES NMGC CURRENTLY MAKE PERIODIC FILINGS THAT PROVIDE**
3 **INFORMATION ON THE FINANCIAL STANDING OF THE UTILITY?**

4 **A.** My initial impression is that this is unnecessary and would be extremely costly to the
5 customers of NMGC. First, NMGC files (1) annual stand-alone financial reports in
6 accordance with Generally Accepted Accounting Principles (“GAAP”) that are audited by
7 an external independent accounting firm, (2) FERC information under the FERC Form 2,
8 and (3) other financial information related to its existing and forecasted capital structure,
9 future debt and equity financing, affiliate transactions, and capital investing activities.
10 NMGC also obtains a credit rating report from Fitch as a stand-alone entity on an annual
11 basis to determine and demonstrate the financial health of NMGC. Together, these reports
12 provide interested parties, and the public, with significant financial information regarding
13 the Company’s financial operations, investing, and financing activities. Additionally, the
14 NMPRC always retains the right to investigate utilities within its jurisdiction if it is
15 interested in more information or additional discussion of information already provided.

16
17 Second, preparing the additional reports on the cadence sought by Mr. Cebulko and in the
18 detail outlined on pages 45 – 47 of this testimony, would be extremely costly to the utility
19 and its customers. If ordered by the Commission this expense to the ratepayers would be
20 significant and with little apparent benefit. This condition should not be accepted.

21
22 **Q. PLEASE SUMMARIZE THIS SECTION OF YOUR TESTIMONY.**

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1 **A.** I have summarized many of the things that NMGC does on its own and in conjunction with
2 the Commission to reflect performance metrics of NMGC's operational and financial
3 performance. To the extent these metrics are mandated or required, NMGC works
4 diligently with its regulators to ensure all mandated and recommended standards and
5 requirements are met. To insinuate that these efforts will be affected by a change in
6 ownership misses the point that local leadership has responsibility for and control over
7 facilitating these efforts with its regulators for the safety, security, and benefit of customers.
8 To the extent these items are performed by NMGC above and beyond mandates, NMGC,
9 as the operator, is committed to continuing this performance excellence. I find no support
10 for intervenor testimony that NMGC would perform differently simply as a result of
11 another entity owning the Company.

IV. SHARED SERVICE CAPITAL COST PROJECTIONS.

14 **Q.** **INTERVENOR WITNESSES INCLUDING MR. GARRETT¹ AND MR.**
15 **SANDBERG² OPINE THAT THE RETURN OF SHARED SERVICES TO NEW**
16 **MEXICO WILL ENTAIL CAPITAL COSTS FOR NEW IT SYSTEMS, IN**
17 **ADDITION TO LABOR COSTS, AND THAT THESE CAPITAL COSTS HAVE**
18 **ONLY BEEN ESTIMATED, WHICH CREATES A RISK TO RATEPAYERS.**
19 **PLEASE ADDRESS THESE OPINIONS.**

¹ Garrett Testimony at p. 39, lns 1-7.

² Sandberg Testimony at p. 29, lns 7-12.

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1 **A.** In response, I would make three points. First, as Mr. Baudier testifies, Saturn Holdco and
2 Emera have agreed to a 24 month Transition Services Agreement (TSA) which offers
3 NMGC and Saturn Holdco the opportunity to develop, over this period of time, a process
4 based on real-time information, to transfer all shared services to New Mexico, or to another
5 shared service organization, such as Delta Utilities, in the most cost effective and beneficial
6 manner. Second, these costs, when sought, will be subject to prudence review by the
7 Commission as recovery is requested, so the risk of recovery is on the owner of the utility.
8 Third, the capital costs of replacement systems, both hard systems and software, cannot be
9 considered in isolation. NMGC has been budgeting for replacement and updated capital
10 costs for IT systems and software, and expects the cost to update its legacy SAP and Asset
11 Suite systems and for other shared IT capital costs from TECO will be approximately \$56
12 million over the next five years. These costs would be incurred without the acquisition that
13 is currently being considered, so the net costs of shifting services to New Mexico must be
14 weighed in the real world where systems are updated or replaced on an ongoing basis.
15 These amounts are not, nor could they be fully known at this time, but are only estimates.
16 As events unfold, system costs will become known and recovery will be sought subject to
17 prudence review as discussed above.

V. ACQUISITION PREMIUM/GOODWILL

20 **Q.** **NMDOJ WITNESS GARRETT TESTIFIES ON PAGES 29 THROUGH 34 OF HIS**
21 **TESTIMONY ABOUT HIS CONCERNS RELATED TO THE ACQUISITION**

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1 **PREMIUM. TO ADDRESS THIS TESTIMONY PLEASE BEGIN BY**
2 **EXPLAINING WHAT IS AN ACQUISITION PREMIUM?**

3 **A.** An Acquisition Premium is simply the difference between the fair market value of a utility,
4 and the book value of the utility. The acquisition premium is often also known as
5 “goodwill.” Both generally accepted accounting standards (“GAAP”) and the Federal
6 Energy Regulatory Commission (“FERC”) require goodwill to be recorded as an asset but
7 NMGC has never included goodwill in its rate base and NMGC has never sought to recover
8 goodwill from customers.

9
10 **Q. ARE ACQUISITION PREMIUMS/GOODWILL ASSETS COMMON?**

11 **A.** In my experience, they are very common. For example, NMGC has had goodwill on its
12 balance sheet since its inception.

13
14 **Q. HAS NMGC’S GOODWILL VALUE CHANGED, AND IF SO, WHY HAS THE**
15 **VALUE CHANGED?**

16 **A.** Over the years the value of NMGC’s goodwill has gone up and down. For example, in
17 2012 when NMGC was owned by Continental Energy the value of goodwill was
18 approximately \$146 million. Then in 2014, when NMGC was owned by TECO, the value
19 of goodwill increased to approximately \$408 million. Most recently, after the
20 announcement of Emera’s intent to sell NMGC to BCP, the goodwill was impaired and
21 decreased.

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1 Goodwill is unlike most other assets. For example, most assets are considered “tangible
2 assets” and can be purchased from a vendor or constructed for a cost. These type of assets
3 represent the vast majority of what NMGC owns and uses to provide service to customers
4 (for example, IT systems and hardware, pipelines, compressor stations, etc.). These types
5 of assets are also depreciated over their useful lives because they break or wear out as they
6 are used to provide service to customers.

7
8 Unlike tangible assets, goodwill is an “intangible asset.” It’s not easily bought or sold, it
9 doesn’t break or wear out over a useful life and is not depreciated, and it’s not used to
10 provide service to customers. The balance of goodwill changes when a company is sold,
11 such as in the prior Continental and TECO acquisitions of NMGC, or when it is considered
12 to be impaired. An impairment of goodwill occurs when the value of a company (or simply
13 put the actual or expected purchase price of a company) is lower than its actual or expected
14 net book value of the Company on the purchase date, which is what occurred when Emera
15 announced the requested sale of NMGC to BCP. As discussed below, NMGC does not
16 include goodwill in rate base and does not include goodwill in customer rates.

17
18 **Q. HAS NMGC EVER INCLUDED GOODWILL IN CUSTOMER RATES IN ANY**
19 **WAY, OR OTHERWISE RECOVERED ANY GOODWILL/ACQUISITION**
20 **PREMIUM FROM ITS CUSTOMERS?**

21 **A.** No. NMGC has always made very clear adjustments in its base rate case filings to remove
22 any impact of Goodwill/Acquisition Premium from its revenue requests. NMGC has never

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1 collected any amount of Goodwill/Acquisition Premium from its customers. In addition
2 NMGC does not include goodwill in its calculation of allowance for funds used during
3 construction (“AFUDC”).
4

5 **Q. HAS NMGC EVER REIMBURSED OR OTHERWISE COMPENSATED ANY OF**
6 **ITS PARENT COMPANIES FOR THE ACQUISITION PREMIUM/GOODWILL**
7 **ASSETS ON NMGC’S BALANCE SHEETS?**

8 **A.** No.
9

10 **Q. TYPICALLY, WHEN THERE IS GOODWILL, HOW DOES A PARENT**
11 **COMPANY RECOVER THE GOODWILL/ACQUISITION PREMIUM IT PAYS**
12 **FOR A COMPANY?**

13 **A.** Simply put, there is no requirement that Goodwill/Acquisition Premiums ever be recovered
14 by a parent company and in fact, it may never be recovered. That has been the case with
15 NMGC and again, NMGC recently wrote its goodwill value down by approximately \$200
16 million. That is a value that Emera will not recover if the Transaction is approved.
17

18 **Q. IF GOODWILL/ACQUISITION PREMIUM IS NOT RECOVERED FROM**
19 **CUSTOMERS OR OTHERWISE PAID TO PARENT COMPANIES, WHY IS IT**
20 **INCLUDED ON NMGC’S BALANCE SHEET AND FINANCIAL STATEMENTS?**

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1 **A.** GAAP requires that goodwill be included in a company's balance sheet/financial
2 statements to account for the difference between the company's fair market value and its
3 book value at the time of a change in ownership.

4
5 **Q.** **NMDOJ WITNESS GARRETT TESTIFIES ON PAGE 30 OF HIS TESTIMONY**
6 **THAT HE IS CONCERNED THAT NMGC WILL INCLUDE GOODWILL IN ITS**
7 **CAPITAL STRUCTURE GOING FORWARD. IS HIS CONCERN VALID?**

8 **A.** No. NMGC and the BCP Applicants have committed to not recover the Acquisition
9 Premium/Goodwill on NMGC's books, either directly or indirectly, from customers. This
10 same commitment has been made and kept in the prior merger and acquisition cases
11 involving NMGC.

12
13 In his testimony, Mr. Garrett cites a Joint Applicant discovery response but has
14 misunderstood the response. NMDOJ 3-14 asked if NMGC would include Goodwill in its
15 capital structure on the balance sheet of the utility. We answered "Yes". The answer
16 provided is correct, as NMGC will continue to list goodwill as an asset on its balance sheet,
17 which impacts NMGC's capital structure on its balance sheet. This is required by GAAP,
18 and NMGC cannot choose to simply ignore goodwill on its balance sheet.

19
20 The confusion is that Mr. Garrett assumes that NMGC will use its GAAP balance sheet
21 capital structure in its general rate cases. NMGC has never used its balance sheet capital
22 structure in a rate case filing and will not include goodwill in the calculation of its regulated

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1 capital structure in the future. NMGC has always used an illustrative capital structure in
2 its rate case filings for precisely this reason, and we plan to continue to do so as long as we
3 have goodwill on our books. Finally, NMGC's regulated capital structure is subject to
4 regulatory review and approval and NMGC would not be able to unilaterally include
5 goodwill in its capital structure in future cases as Mr. Garrett seems to suggest.

6
7 **Q. NMDOJ WITNESS GARRETT RECOMMENDS ON PAGE 32 OF HIS**
8 **TESTIMONY THAT THE COMMISSION REQUIRE THAT NMGC NOT**
9 **INCLUDE GOODWILL/ACQUISITION PREMIUM IN RATE BASE OR ITS**
10 **CAPITAL STRUCTURE. DO YOU AGREE?**

11 **A.** Yes. This is how NMGC has operated for the last fifteen years and is consistent with the
12 commitments that NMGC and the BCP Applicants have made in this case. Our
13 commitment from the beginning of this case is that customers will not pay for Acquisition
14 Premium/Goodwill amounts. So, on this point, Mr. Garrett and I are in complete
15 agreement.

16
17 **VI. MISCELLANEOUS ISSUES**

18 **Q. NMDOJ WITNESS GARRETT, ON PAGE 6 OF HIS TESTIMONY, STATES THAT**
19 **THE PROPOSED TRANSACTION "PLACES UNACCEPTABLE RISK ON**
20 **NMGC'S CAPTIVE CUSTOMERS." DO YOU AGREE?**

21 **A.** No. For the past sixteen years, my priority has been to ensure that NMGC provides
22 reasonable and reliable service to customers at fair, just, and reasonable rates. As the

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1 President of NMGC for the last decade, this has been at the forefront of my mind. I have
2 spent considerable time discussing the future operation of NMGC under Saturn Holdco
3 ownership, and I am confident that my leadership team and the NMGC board of directors
4 will continue to have operational control over the provision of service to customers.

5
6 Simply put, I would not endorse the Transaction if I had any concern that NMGC would
7 be harmed or its customers would be faced with the risk of less reliable service and
8 unreasonable rates.

9
10 **Q. NMDOJ WITNESS GARRETT TESTIFIES ON PAGE 28 OF HIS TESTIMONY**
11 **THAT NMGC DOES NOT HAVE ANY EXPERIENCE IN TRAINING WORKERS**
12 **IN A VARIETY OF AREAS INCLUDING INFORMATION TECHNOLOGY,**
13 **FINANCE, FINANCIAL ACCOUNTING, TAX ACCOUNTING, HUMAN**
14 **RESOURCES, ADMINISTRATION AND PAYROLL SERVICES. IS THIS**
15 **ACCURATE?**

16 **A.** Again, I have to disagree with Mr. Garrett. First, NMGC has employees with significant
17 information technology, finance, financial accounting, tax accounting, human resources,
18 administration and payroll services experience. Second, as a responsible management
19 team, we plan that a certain portion of our new hires will come with experience already.
20 We plan to hire a relatively small number of employees that have never had experience in
21 these fields. Third, if there is a specific area, such as taxes, where we do not currently have
22 great depth, we may hire a consultant to do the first wave of training. This is a model we

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1 employed very successfully for our new Hansen CIS software system. We were able to
2 train dozens of new and existing employees on the new software system and have it go-
3 live without any significant issues.

4
5 Our leadership team will have no trouble making sure new employees are trained properly
6 in every field we need. It is also important to note that we do not anticipate seeking
7 recovery of these training-related costs since they will be incurred prior to the effective
8 date of new rates in our next general rate case application.

9
10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 **A. Yes.**



New Mexico GAS COMPANY

June 30, 2011

Mr. Nick Guillen
New Mexico Public Regulation Commission
1120 Paseo de Peralta
Santa Fe, NM 87501

**Re: Quality of Customer Service
Case No. 09-00163-UT
2010 Annual Customer Service Report**

Dear Mr. Guillen:

Pursuant to the Final Order of the New Mexico Public Regulation Commission in this proceeding issued March 24, 2011 (The "Final Order"), New Mexico Gas Company, Inc ("NMGC" or the "Company") hereby files its First Annual Customer Service Report for the calendar year 2010. That report is attached hereto as Exhibit "A".

In response to Paragraph 7(c) of the Final Order NMGC selected a target to answer 80% of calls answered within 60 seconds (the "80% Target"). The 80% Target is a standard used in call centers for all types of businesses in various industries, not necessarily gas utilities. NMGC selected this target knowing that it would be difficult to achieve for a relatively new utility but believes that the 80% Target sets a "stretch goal" that NMGC should seek to meet.

The first year report indicates that NMGC was not able to meet the 80% Target in each of the 12 month periods. The challenge that faces the Company is to balance the need to have sufficient resources to handle the peak period of customer calls while not having unproductive resources during off peak periods. The gas utility is a seasonal business and customer call volumes vary during the low and high usage months. Also, NMGC has found that call volume for its customers varies at different periods of the month (higher volumes during the first and last days of the month) and during each day (morning and evening have greater call volumes than other times of the day).

Please conform the attached copy and return it to our courier for our files. If you need additional information or have any questions, please contact me at (505) 697-3832.

Sincerely,

Rebecca Carter
Rebecca Carter
Regulatory Affairs

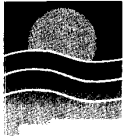
Enclosures

Cc: Jim Brack - NMPRC
Jim Williamson - NMPRC

New Mexico Gas Company
2010 Annual Customer Report
NMPRC Case 09-00163-UT

Utility Metric	Definition	Metric	Results											
			Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
Number of customer complaints per 1,000 customers	Those matters received from customers by the Consumer Relations Division of the Commission and forwarded to one of the utilities for response or resolution	Complaints	501,473	500,505	502,025	500,968	499,769	498,949	497,978	497,469	497,231	498,217	500,277	502,184
		Customers												
		Complaints / 1,000 customers	0.0020%	0.0018%	0.0024%	0.0018%	0.0018%	0.0018%	0.0012%	0.0020%	0.0004%	0.0028%	0.0012%	0.0014%
		Billing - High Bill	1		2	2	2	1	2					4
Total number of customer complaints reported by categories of complaints.	Complaints categorized by primary keyword used by the Consumer Relations Division of the Commission	Billing - Estimate												
		Billing - Metering		1										1
		Billing - Transfer	1		1									
		Billing - Other		3	2	3	2	2	2			5	1	
		Service - Extension												
		Service - Disconnect												
		Service - Non-Payment	4	3	3	3	3	1	1	5	1	3	2	1
		Service - Interruption	2	2										
		Service - Repairs / Delays	2											
		Service - Dissatisfied			1								1	
		Service - Treatment			1									
		Service - Misad Commitment												
		Service - Other			2			1	1	2		2		
		Service - Easement/Right of Way												
		Danger - Gas Leak							1				2	
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total customer calls	NMGCC target: 80% of calls answered within 60 seconds	Other - Fees										1		
		Other - Deposit										1		
		Tariffs											1	
		Service Level	58.08%	50.13%	40.77%	69.86%	78.08%	81.47%	80.27%	85.67%	82.45%	70.82%	61.87%	80.61%
Average time (a) for answering calls	Number of cancelled bills/number of meters deployed in the field	Average Speed of Answer	93s	146s	177s	77s	51s	35s	37s	27s	31s	61s	77s	42s
		Cancel / Rebill	2,089	2,985	4,120	3,950	4,724	5,082	6,705	5,768	4,487	4,291	2,822	2,457
		Meters Deployed	507,821	506,340	507,480	505,992	504,517	503,827	503,610	503,694	504,132	505,271	506,825	508,871
		Accuracy	99.59%	99.41%	99.18%	99.22%	99.06%	98.09%	98.67%	98.86%	99.11%	99.15%	99.44%	99.32%
Number of disconnects per month and identify the number that were for non-payment	Discontinuance of service notices sent to residential customers	Disconnect Notices	36,894	40,555	47,241	44,709	43,203	42,010	32,803	25,840	24,778	23,172	21,541	30,140
		Disconnect for Non-Payment	1,455	1,845	2,852	2,587	2,501	1,728	2,118	2,424	1,949	1,707	1,157	819
		Residential customers with installment payment plans	32	40	1,234	796	521	496	431	313	150	61	26	54
		Installment payment plans in effect at the end of each month	74	61	350	1,348	1,660	1,892	1,468	1,241	872	491	196	108
Number of customers that are in the billing system by month that are qualified by HSD	Active customer accounts that are eligible for LIHEAP assistance	Eligible Customers	7,244	8,307	2,936	322	63	26	15	14	6	284	5,553	2,949
		LIHEAP protected accounts in effect at the end of each month											5,652	8,559

2011-03-03 10:27:10Z



New Mexico GAS COMPANY

June 29, 2012

Mr. Nick Guillen
New Mexico Public Regulation Commission
1120 Paseo de Peralta
Santa Fe, NM 87501

**RE: 2011 Annual Quality of Customer Service Report
NMPRC Case No. 09-00163-UT**

Dear Mr. Guillen:

Pursuant to the Final Order of the New Mexico Public Regulation Commission ("NMPRC" or the "Commission") in the above-referenced proceeding issued March 24, 2011 (the "Final Order"), New Mexico Gas Company, Inc. ("NMGC" or the "Company") hereby files its 2011 Annual Quality of Customer Service Report. This report is attached hereto as Exhibit A.

In its 2010 Annual Report, filed with the NMPRC on June 30, 2011, the Company reported it selected a target for calls answered within 60 seconds at 80% (the "80% Target"). NMGC explained that the 80% Target was a standard used in call centers for all types of businesses in various industries, not necessarily gas utilities and that gas utility call centers had different challenges than other industry call centers. Because the 80% Target was not reflective of NMGC's customer focus and business needs, the Company has changed its target for calls answered within 60 seconds to 70% (the "70% Target"). The 70% Target better reflects the Company's need to balance its resources during peak periods of customer calls and better utilizing its resources during off peak periods.

Please conform the attached copy and return it to our courier for our files. If you need additional information or have any questions, please contact me at (505) 697-3832.

Sincerely,

Rebecca Carter
Regulatory Affairs

Enclosures

Cc: Mr. Jim Brack – NMPRC
Mr. Jim Williamson – NMPRC
Mr. Tim Martinez - NMPRC
Mr. Raymond Sanchez – NMGC
Mr. Clyde Worthen – Keleher & McLeod
Ms. Diana Jaramillo – NMGC
Mr. John Fernald - NMGC

NMGCO#2504781

6/27/2012

New Mexico Gas Company
2011 Annual Customer Report
NMPRC Case 09-00163-UT

Utility Notices	Definition	Metric	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Yearly Total
Number of customer complaints per 1,000 customers	Those matters received from customers by the Consumer Relations Division of the Commission and forwarded to one of the utilities for response or resolution	Complaints Customers	7	12	4	9	2	2	5	3	4	4	11	5	68
			503,053	504,193	503,874	502,856	501,821	500,437	499,451	498,925	498,564	499,891	502,252	504,293	
		Complaints / 1,000 customers	0.0014%	0.0024%	0.0008%	0.0018%	0.0004%	0.0004%	0.0010%	0.0006%	0.0008%	0.0008%	0.0022%	0.0010%	
Total number of customer complaints reported by categories of complaints.	Complaints categorized by primary keycode used by the Consumer Relations Division of the Commission	Billing - High Bill		2	2	1			1				1		7
		Billing - Estimate													0
		Billing - Metering		1											1
		Billing - Transfer													0
		Billing - Other		3	1	4		2	2	1	2	2	1	1	19
		Service - Extension													0
		Service - Disconnect													0
		Non-Payment	3	2	1	4	1		1	1	1	2	2	2	20
		Other Reasons	1										3		4
		Service - Interruption													1
		Service - Repairs / Delays						1							1
		Service - Dissatisfied		1										1	2
		Service - Treatment													0
		Service - Missed Commitment	1	1						1					3
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total customer calls Average time (s) for answering calls Meter reading accuracy	NMGC target: 70% of calls answered within 60 seconds Number of cancelled bills / number of meters deployed in the field Meter reading accuracy	Service - Other	2	2										1	5
		Service - Escorted/Right of Way													0
		Danger - Gas Leak													0
		Other - Fees													0
		Other - Deposit							1				1		2
		Tariffs											3		3
															0
		Service Level	61.89%	61.08%	66.07%	61.15%	64.17%	75.49%	75.95%	70.24%	79.38%	65.78%	72.97%	79.93%	68.93%
		Average Speed of Answer	95s	110s	71s	105s	95s	51s	45s	61s	43s	77s	62s	44s	
		Cancel / Rebills	3,083	4,077	4,666	3,841	2,991	4,004	2,498	2,600	2,279	1,825	1,220	1,537	
Number of disconnects per month and identify the number that were for non-payment Number of residential customers with installment agreements by month Number of customers that are in the billing system by month that are qualified by HSD	Discontinuance of service notices sent to residential customers Discontinuance of service to residential customers Residential customers with installment payment plans Active customer accounts that are eligible for LIHEAP assistance	Meters Deployed	515,586	515,752	515,868	515,719	515,480	514,587	513,961	514,194	514,520	515,089	515,806	516,000	
		Accuracy	99.40%	99.21%	99.10%	99.25%	99.42%	99.22%	99.51%	99.49%	99.58%	99.68%	99.76%	99.70%	
		Disconnect Notices	31,329	31,566	46,146	42,731	39,110	36,914	31,653	26,914	25,872	25,379	21,790	29,696	
		Disconnect for Non-Payment	1390	309	2054	2176	1903	2445	2201	2128	1517	1418	1135	584	
		Installment payment plans set up in the month	40	22	661	506	358	261	211	185	84	52	24	38	
		Installment payment plans in effect at the end of each month	43	41	135	478	687	804	566	508	360	191	94	43	
		Eligible Customers	17670	2157	353	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4473	3135	
		LIHEAP protected accounts in effect at the end of each month	25988	24020	28485	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3844	6573	

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June 28, 2013

Mr. Nick Guillen
New Mexico Public Regulation Commission
1120 Paseo de Peralta
Santa Fe, NM 87501

**RE: 2012 Annual Quality of Customer Service Report
NMPRC Case No. 09-00163-UT**

Dear Mr. Guillen:

Pursuant to the Final Order of the New Mexico Public Regulation Commission ("NMPRC" or the "Commission") in the above-referenced proceeding issued March 24, 2011 (the "Final Order"), New Mexico Gas Company, Inc. ("NMGC" or the "Company") hereby files its 2012 Annual Quality of Customer Service Report. This report is attached hereto as Exhibit A.

Please conform the attached copy and return it to our courier for our files. If you need additional information or have any questions, please contact me at (505) 697-3832.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rebecca Carter".

Rebecca Carter
Regulatory Affairs

Enclosures

Cc: Mr. Jim Brack – NMPRC
Mr. Jim Williamson – NMPRC
Mr. Tim Martinez - NMPRC
Mr. Raymond Sanchez – NMGC
Mr. Brian Haverly – Keleher & McLeod
Ms. Diana Jaramillo – NMGC
Ms. Nicole Strauser – NMGC

NMGCO#2630230

New Mexico Gas Company
2012 Annual Customer Report
NMPRC Case 09-00163-UT

Priority Metrics	Definition	Metric	Jan-12	Feb-12	Mar-12	Apr-12	May-12	Jun-12	Jul-12	Aug-12	Sep-12	Oct-12	Nov-12	Dec-12	Yearly Total
			5	6	7	4	7	3	5	4	4	4	8	4	61
Number of customer complaints per 1,000 customers	Those matters received from customers by the Consumer Relations Division of the Commission and forwarded to one of the utilities for response or resolution	Complaints	505,046	505,234	505,390	504,402	503,088	501,893	500,876	500,571	500,801	501,910	503,921	505,620	
		Customers	0.0010%	0.0012%	0.0014%	0.0008%	0.0014%	0.0006%	0.0010%	0.0008%	0.0008%	0.0008%	0.0016%	0.0008%	
		Complaints / 1,000 customers													
		Complaints / 1,000 customers													
Total number of customer complaints reported by categories of complaints.	Complaints categorized by primary keycode used by the Consumer Relations Division of the Commission	Billing - High Bill	1				2	1			1				5
		Billing - Estimate							1						1
		Billing - Metering								1					1
		Billing - Transfer													
		Billing - Other	2	1	2	1						1	2	1	2
		Service - Extension													11
		Service - Disconnect													
		Non-Payment	1	3	2		3	1	2	2	1		3	3	21
		Other Reasons	2	1	1				1				1		4
		Service - Interruption													2
		Service - Repairs / Delays													
		Service - Dissatisfied								1			1		2
		Service - Treatment													
		Service - Missed Commitment			1										1
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total customer calls	NMGC target: 70% of calls answered within 60 seconds	Service - Other				2	2	1				1			7
		Service - Easement/Right of Way				1									1
		Danger - Gas Leak													
		Other - Fees													
		Other - Deposit		1											1
		Tariffs								1	1				2
		Service Level	61.19%	78.14%	80.68%	82.72%	79.12%	73.32%	81.32%	90.92%	89.55%	87.78%	79.88%	66.58%	
		Average Speed of Answer	97s	44s	40s	30s	42s	47s	46s	22s	25s	26s	39s	71s	
		Cancel / Rebills	1,297	1,830	2,423	2,279	1,908	1,929	1,880	1,930	1,719	1,455	1,187	1,135	
		Meters Deployed	515,797	516,064	516,350	516,532	516,701	516,897	516,754	516,614	517,040	517,636	518,338	518,740	
		Accuracy	99.75%	99.65%	99.53%	99.56%	99.63%	99.63%	99.64%	99.63%	99.67%	99.72%	99.77%	99.78%	
Number of disconnects per month and identify the number that were for non-payment	Discontinuance of service notices sent to residential customers	Disconnect Notices	33,848	33,929	40,029	33,879	29,107	20,181	16,962	12,775	11,887	12,890	12,476	15,584	
		Disconnect for Non-Payment	1469	1479	1731	2314	2315	2087	2210	1983	1487	1392	1107	814	
		Residential customers with installment payment plans	54	70	355	335	275	221	237	192	139	86	119	217	
		Active customer accounts that are eligible for LIHEAP assistance	39	63	171	393	513	474	493	429	270	224	152	203	
Number of residential customers with installment agreements by month	Active customer accounts that are eligible for LIHEAP assistance	Eligible Customers	3198	3559	323	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3971	2408	
		LIHEAP protected accounts in effect at the end of each month	9384	12397	15098	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7659	6639	



A TECO ENERGY COMPANY
Phone 505-697-3832
Fax 505-697-4487

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June 30, 2015

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
1120 Paseo de Peralta
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

**RE: New Mexico Gas Company, Inc.'s 2014 Quality of Service Annual Report
NMPRC Case No. 13-00231-UT**

Dear Ms. Sandoval:

Enclosed herewith is New Mexico Gas Company, Inc.'s ("NMGC") 2014 Quality of Service Annual Report for the period of January 1, 2014 through December 31, 2014. This filing is being provided pursuant to paragraph 13 of the Stipulation, dated May 7, 2014 (the "Stipulation") that was approved by the New Mexico Public Regulation Commission, in Case No. 13-00231-UT, which provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3832.

Sincerely,

A handwritten signature in black ink that reads "Rebecca Carter".

Rebecca Carter
Project Manager, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Dennis Romero – NMPRC
Ms. Sandra Skogen – NMPRC
Mr. Thomas Banner – NMPRC

New Mexico Gas Company
2014 Quality of Service Report

Metric	Definition	Metric												Yearly Total
		Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	
Number of customer complaints per 1,000 customers	Complaints	3	5	4	6	2	1	2	3	4	2	1	2	35
	Customers	513,812	513,989	513,872	513,275	512,416	511,237	510,418	510,423	510,250	511,292	513,458	515,472	
	Complaints / 1,000 customers	0.0006%	0.0010%	0.0008%	0.0012%	0.0004%	0.0002%	0.0004%	0.0006%	0.0008%	0.0004%	0.0002%	0.0004%	
	Billing - High Bill				1					1				3
	Billing - Estimate													0
	Billing - Metering			1				1						2
	Billing - Transfer				1						1			2
	Billing - Other		2	2				1		1			1	7
	Service - Extension									1				1
	Service - Disconnect													0
Total number of customer complaints reported by categories of complaints.	Non-Payment	2	2			1	1		1	1		1	1	10
	Other Reasons				2									2
	Service - Interruption									1		1		1
	Service - Repairs / Delays													0
	Service - Disatisfied				1	1								2
	Service - Treatment													0
	Service - Missed Commitment													1
	Service - Other	1	1						2					4
	Service - Easement/Right of Way													0
	Danger - Gas Leak													0
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total customer calls	Other - Fees													0
	Other - Deposit													0
	Tariffs													0
Average time (s) for answering calls	Service Level													
	NMGC target: 70% of calls answered within 60 seconds	68.87%	53.02%	59.64%	68.90%	51.07%	75.41%	92.05%	96.79%	93.72%	96.38%	93.13%	90.75%	
	Average Speed of Answer	68s	160s	116s	63s	138s	58s	19s	11s	16s	8s	20s	22s	
	Number of cancelled bills / number of meters deployed in the field	1,454	1,661	1,721	1,798	1,358	1,567	4,969	1,501	1,412	1,191	1,024	2,612	
	Meter reading accuracy	520,880	521,135	521,068	520,702	520,689	520,720	520,933	521,239	521,608	522,267	523,184	523,933	
	Accuracy	99.72%	99.68%	99.67%	99.65%	99.74%	99.70%	99.05%	99.71%	99.73%	99.77%	99.80%	99.50%	
	Average Leak Response	27.59	27.00	24.62	23.35	24.40	25.41	23.92	26.29	24.37	25.14	26.50	24.57	
	Outside Leaks	26.44	29.15	24.79	24.16	23.01	25.92	23.08	27.77	27.50	25.23	25.51	27.17	
	Damage Tickets	2.16	1.96	1.90	1.60	1.73	2.31	2.20	1.31	2.65	2.07	1.77	2.39	
	Disconnection of service notices sent to residential customers													
Number of disconnects per month and identify the number that were for non-payment	Disconnect Notices	26,611	31,489	36,798	33,554	34,035	20,808	18,159	14,168	12,385	11,660	9,970	13,297	
	Discontinuance of service to residential customers	1,542	1,704	1,942	2,226	2,283	2,235	2,092	1,711	1,610	1,602	918	804	
	Residential customers with installment payment plans	96	65	681	224	232	134	129	87	43	27	28	36	
	Installment payment plans set up in the month													
	Installment payment plans in effect at the end of each month	81	89	118	659	444	447	536	298	240	144	68	53	
	Eligible Customers													
	Active customer accounts that are eligible for LIHEAP assistance	3276	2851	2285	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1487	1751	
	LIHEAP protected accounts in effect at the end of each month	7049	9911	11384	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2592	4318	

NMGC0#3050414



New Mexico

GAS COMPANY

Phone 505-697-3832
Fax 505-697-4487

June 30, 2016

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
1120 Paseo de Peralta
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

**RE: New Mexico Gas Company, Inc.'s 2015 Quality of Service Annual Report
NMPRC Case No. 15-00327-UT**

Dear Ms. Sandoval:

Enclosed herewith is New Mexico Gas Company, Inc.'s ("NMGC") 2015 Quality of Service Annual Report for the period of January 1, 2015 through December 31, 2015. This filing is being provided pursuant to paragraph 13 of the Stipulation, dated April 11, 2016 that was approved by the New Mexico Public Regulation Commission, in Case No. 15-00327-UT, which provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3832.

Sincerely,

Rebecca Carter
Manager, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Dennis Romero – NMPRC
Ms. Sandra Skogen – NMPRC

NMGC0#3265061

New Mexico Gas Company
2015 Quality of Service Report

Utility Metrics	Definition	Metric	Yearly Total											
			Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15
Number of customer complaints per 1,000 customers	Those matters received from customers by the Consumer Relations Division of the	Complaints	4	3	2	0	2	2	2	0	1	0	1	1
		Customers	516,511	516,915	516,916	516,429	515,756	515,104	514,508	514,434	514,441	515,540	517,312	518,927
		Complaints / 1,000 customers	0.0008%	0.0006%	0.0004%	0.0000%	0.0004%	0.0004%	0.0004%	0.0000%	0.0002%	0.0000%	0.0002%	0.0002%
		Billing - High Bill		1										
		Billing - Estimate												
		Billing - Metering												
		Billing - Transfer												
		Billing - Other												
		Service - Extension												
		Service - Disconnect												
Total number of customer complaints reported by categories of complaints.	Complaints categorized by primary keycode used by the Consumer Relations Division of the Commission	Non-Payment	2	1	1		1							
		Other Reasons	1					1	1				1	3
		Service - Interruption												0
		Service - Repairs / Delays												1
		Service - Dissatisfied												3
		Service - Treatment	1											1
		Service - Missed Commitment												0
		Service - Other												0
		Service - Easement/Right of Way												0
		Danger - Gas Leak												0
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total customer calls	NMGC target: 70% of calls answered within 60 seconds	Other - Fees												0
		Other - Deposit												0
		Tariffs												0
		Service Level												
		Average Speed of Answer	90.65%	71.38%	76.90%	84.94%	87.48%	90.94%	90.42%	84.54%	91.22%	71.46%	50.90%	61.03%
		Average time (s) for answering calls	20s	66s	48s	33s	29s	20s	23s	35s	20s	77s	141s	105s
		Cancel / Rebills	1,409	1,406	1,703	1,756	2,315	2,217	2,499	2,604	2,016	2,104	1,287	1,195
		Meters Deployed	524,273	524,419	524,714	522,633	522,662	525,323	525,615	525,905	526,260	526,623	527,271	527,613
		Accuracy	99.73%	99.73%	99.68%	99.66%	99.56%	99.58%	99.52%	99.50%	99.62%	99.60%	99.76%	99.77%
		Average Leak Response	25.14	24.39	25.15	24.73	24.73	23.94	25.49	23.40	24.88	25.11	25.85	25.70
Number of residential customers with installation agreements by month	Active customer accounts that are eligible for LIHEAP assistance/# of LIHEAP payments received	Inside Leaks	24.49	24.20	23.27	25.63	23.56	24.17	23.93	23.90	24.61	24.72	27.00	27.31
		Outside Leaks												
		Damage Tickets	1.64	1.17	1.25	1.42	1.90	1.16	2.19	1.05	1.35	2.08	2.90	0.68
		Discontinuation of service notices sent to residential customers												
		Discontinuation of service to residential customers	23,077	28,983	29,237	30,018	18,568	16,615	13,253	10,165	9,559	9,177	8,448	11,992
		Discontinuation of service to residential customers	1,328	1,586	1,812	1,867	1,596	1,734	1,487	1,629	1,396	1,274	981	847
		Residential customers with installment payment plans	38	57	250	142	81	45	44	37	15	12	14	16
		Installment payment plans in effect at the end of each month	49	76	86	248	169	190	139	89	68	45	28	14
		Eligible Customers												
		LIHEAP protected accounts in effect at the end of each month	1,807	1,772	777	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1,511
Number of residential customers with installation agreements by month	LIHEAP protected accounts in effect at the end of each month	LIHEAP protected accounts in effect at the end of each month	6,779	9,160	10,159	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2,602	4,528



Phone 505-697-3832
Fax 505-697-4487

June 30, 2017

JUN 30 '17 PM 3:11

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
1120 Paseo de Peralta
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

**RE: New Mexico Gas Company, Inc.'s 2016 Quality of Service Annual Report
NMPRC Case No. 15-00327-UT**

Dear Ms. Sandoval:

Enclosed herewith is New Mexico Gas Company, Inc.'s ("NMGC") 2016 Quality of Service Annual Report for the period of January 1, 2016 through December 31, 2016. This filing is being provided pursuant to paragraph 13 of the Stipulation, dated April 11, 2016 that was approved by the New Mexico Public Regulation Commission, in Case No. 15-00327-UT, which provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3832.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Carter".

for Rebecca Carter
Manager, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Brad Borman – NMPRC

NMGC0#3534405

New Mexico Gas Company
2016 Quality of Service Report

Utility Metrics		Definition	Metric	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Yearly Total		
Number of customer complaints per 1,000 customers	Those matters received from customers by the Consumer Relations Division of the	Complaints		3	3	4	3	0	3	1	2	1	1	1	1	23		
		Customers																
		Complaints / 1,000 customers																
		Billing - High Bill	1		1						1							
		Billing - Estimate																
		Billing - Metering											1					
		Billing - Transfer				1				1								
		Billing - Other		2	1										1			
		Service - Extension																
		Service - Disconnect																
Total number of customer complaints reported by categories of complaints.	Complaints categorized by primary keycode used by the Consumer Relations Division of the Commission	Non-Payment	1	1	1				1		1					1		
		Other Reasons				1												
		Service - Interruption																
		Service - Repairs / Delays																
		Service - Dissatisfied	1		1				1									
		Service - Treatment																
		Service - Missed Commitment																
		Service - Other																
		Service - Easement/Right of Way																
		Danger - Gas Leak												1				
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total customer calls	Service Level	Danger-Other																
		Other - Fees																
		Other - Deposit																
		Tariffs																
		Average time (s) for answering calls	175	262	87	81	53	50	33	32	31	29	31	27				
		Average Speed of Answer/Second	39.10%	45.80%	87.16%	88.31%	94.09%	93.79%	97.56%	96.57%	67.63%	97.55%	98.37%	98.98%				
		Number of cancelled bills / number of meters deployed in the field	1,598	1,460	1,932	2,113	2,583	2,458	2,575	2,512	2,039	1,652	1,659	2,150				
		Meter reading accuracy	527,646	527,762	527,763	527,972	528,176	528,289	528,544	528,685	529,021	529,337	529,644	529,498				
		Cancel / Rebills	99.70%	99.72%	99.63%	99.60%	99.51%	99.53%	99.51%	99.52%	99.61%	99.69%	99.69%	99.59%				
		Average Leak Response	26.25	25.50	26.15	26.43	26.63	24.93	25.14	24.64	24.90	25.09	25.37	29.07				
Damage Tickets	Discontinuation of service notices sent to residential customers	Outside Leaks	24.01	23.60	24.15	25.02	27.66	24.23	23.60	22.75	23.43	23.94	25.07	26.05				
		All Damages	2.64	2.78	3.24	3.23	3.82	2.58	2.53	2.58	2.27	3.11	2.53	2.57				
		Damages (excluding hand tools)	2.49	1.80	2.16	1.08	1.97	1.96	1.73	1.57	1.89	2.08	1.41	2.09				
		Disconnect Notices	19,512	23,111	27,437	22,845	17,839	14,298	11,510	9,034	8,374	8,913	8,066	17,020				
		Disconnect for Non-Payment	1,103	1,535	1,854	1,735	1,754	1,639	1,267	1,715	1,317	1,173	958	771				
		Installation Payment Plans (set up in the month)	9	11	342	63	65	35	28	19	14	7	13	48				
		Installation Payment Plans (in effect at the end of each month)	40	8	39	349	157	118	72	58	38	20	31	51				
		Eligible Customers																
		LIHEAP (protected accounts in effect at the end of each month)	1,564	1,619	1,081	615	415	272	219	166	222	1,223	1,145	1,364				
		Number of residential customers with installment agreements by month	Active customer accounts that are eligible for LIHEAP assistance# of LIHEAP payments received		6,721	8,407	0	0	0	0	0	0	0	0	0	3,256	4,172	



Phone 505-697-3832
Fax 505-697-4487

June 29, 2018

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
1120 Paseo de Peralta
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

FILED IN OFFICE OF

JUN 29 2018

NM PUBLIC REGULATION COMM
RECORDS MANAGEMENT BUREAU

**RE: New Mexico Gas Company, Inc.'s 2017 Quality of Service Annual Report
NMPRC Case No. 15-00327-UT**

Dear Ms. Sandoval:

Enclosed herewith is New Mexico Gas Company, Inc.'s ("NMGC") 2017 Quality of Service Annual Report for the period of January 1, 2017 through December 31, 2017. This filing is being provided pursuant to paragraph 13 of the Stipulation, dated April 11, 2016 that was approved by the New Mexico Public Regulation Commission, in Case No. 15-00327-UT, which provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3832.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Carter".

Rebecca Carter
Manager, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Brad Borman – NMPRC

New Mexico Gas Company
2017 Quality of Service Report

Utility Metrics	Definition	Metric	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Yearly Total
Number of customer complaints per 1,000 customers	Those matters received from customers by the Consumer Relations Division of the	Complaints	0	0	0	1	1	0	1	0	1	1	2	0	7
		Customers	522,513	522,656	522,818	522,505	521,875	521,189	520,756	520,380	520,560	521,367	522,970	524,553	
		Complaints / 1,000 customers	0.0000%	0.0000%	0.0000%	0.0002%	0.0002%	0.0000%	0.0002%	0.0000%	0.0002%	0.0002%	0.0002%	0.0000%	
		Billing - High Bill													
		Billing - Estimate													
		Billing - Metering													
		Billing - Transfer													
		Billing - Other					1								
		Service - Extension													
		Service - Disconnect				1									
Total number of customer complaints reported by categories or complaints.	Complaints categorized by primary keycode used by the Consumer Relations Division of the Commission	Service - Interruption													
		Service - Repairs / Delays													
		Service - Dissatisfied													
		Service - Treatment													
		Service - Missed Commitment													
		Service - Other							1			1			
		Service - Easement/Right of Way													
		Danger - Gas Leak													
		Danger - Other													
		Other - Fees									1				
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total customer calls	NMGCC target: 70% of calls answered within 60 seconds	Other - Deposit													
		Tariffs													
		Service Level	89.10%	92.78%	94.18%	89.57%	96.36%	92.78%	88.47%	98.15%	95.25%	92.27%	97.51%	97.45%	
		Average Speed of Answer	80s	67s	65s	72s	36s	58s	77s	31s	54s	62s	33s	34s	
		Cancel / Rebills	2,144	1,671	4,088	2,036	1,899	1,882	1,928	1,838	1,796	2,871	2,624	1,104	
		Meters Deployed	529,445	529,584	529,950	530,201	530,526	530,765	531,005	531,372	531,604	532,047	532,732	532,771	
		Accuracy	99.60%	99.68%	99.23%	99.62%	99.64%	99.65%	99.64%	99.65%	99.66%	99.46%	99.51%	99.79%	
		Average Leak Response	24.52	25.09	25.97	24.50	25.89	25.93	25.65	24.00	24.73	24.84	25.97	26.51	
		Outside Leaks	24.78	23.32	21.91	22.70	23.30	24.66	22.18	23.53	25.33	24.77	24.18	26.39	
		All Damages (%)	1.83	1.60	1.91	2.46	3.40	2.88	2.37	2.16	3.55	2.62	2.29	2.72	
Number of disconnects per month and identify the number that were for non-payment	Discontinuance of service notices sent to residential customers	Damages excluding hand tools (%)	1.02	1.02	1.43	1.77	2.43	2.16	1.58	1.62	2.53	2.03	2.04	2.56	
		Disconnect Notices	17,356	23,279	23,007	22,776	17,458	15,454	12,960	10,752	9,418	9,413	7,529	11,486	
		Disconnect for Non-Payment	1,246	1,775	1,764	1,394	1,792	1,357	1,024	1,563	1,050	1,145	826	739	
		Installment payment plans set up in the month	58	28	287	91	55	40	28	15	12	14	6	17	
		Installment payment plans in effect at the end of each month	47	52	54	378	145	154	107	94	59	44	32	33	
		Active customer accounts that are eligible for LIHEAP assistance# of LIHEAP payments received													
		Eligible Customers	1,415	1,675	930	640	454	312	204	239	182	1,403	1,350	1,139	
		LIHEAP protected accounts in effect at the end of each month	6,449	8,425	0	0	0	0	0	0	0	0	3,176	4,327	



Phone 505-697-3832
Fax 505-697-4487

June 28, 2019

FILED IN OFFICE OF

JUN 28 2019

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
1120 Paseo de Peralta
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

NM PUBLIC REGULATION COMM
RECORDS MANAGEMENT BUREAU

**RE: New Mexico Gas Company, Inc.'s 2018 Quality of Service Annual Report
NMPRC Case No. 15-00327-UT**

Dear Ms. Sandoval:

Enclosed herewith is New Mexico Gas Company, Inc.'s ("NMGC") 2018 Quality of Service Annual Report for the period of January 1, 2018 through December 31, 2018. This filing is being provided pursuant to paragraph 13 of the Stipulation, dated April 11, 2016 that was approved by the New Mexico Public Regulation Commission, in Case No. 15-00327-UT, which provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3832.

Sincerely,

Rebecca Carter
Manager, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Brad Borman – NMPRC
Mr. Raj Soloman – NMPRC

New Mexico Gas Company
2018 Quality of Service Report

Utility Metrics	Definition	Metric	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Yearly Total
Number of customer complaints per 1,000 customers	Those matters received from customers by the Consumer Relations Division of the	Complaints	0	1	3	1	1	2	1	2	1	0	2	0	14
		Customers	525,547	526,100	526,341	526,078	525,516	525,163	524,903	525,019	525,127	526,342	528,020	529,461	
		Complaints / 1,000 customers	0.0000%	0.0002%	0.0006%	0.0002%	0.0002%	0.0004%	0.0002%	0.0004%	0.0002%	0.0000%	0.0004%	0.0000%	
		Billing - High Bill		1											
		Billing - Estimate													
		Billing - Metering													
		Billing - Transfer					1						1		
		Billing - Other			1	1		2	1		1		1		
		Service - Extension													
		Service - Disconnect													
		Service - Non-Payment								1					
		Service - Interruption													
		Service - Repairs / Delays													
Total number of customer complaints reported by categories of complaints.	Complaints categorized by the primary keycode used by the Consumer Relations Division of the Commission	Service - Dissatisfied													
		Service - Treatment													
		Service - Missed Commitment													
		Service - Other								1					
		Service - Easement/Right of Way			1										
		Danger - Gas Leak													
		Danger - Other													
		Other - Fees													
		Other - Deposit													
		Tariffs													
		Service Level													
		NMGC target: 70% of calls answered within 60 seconds	93.08%	95.81%	94.97%	92.98%	91.56%	84.41%	89.21%	96.91%	92.08%	89.04%	96.59%	93.69%	
		Average time (s) for answering calls	63s	48s	52s	55s	64s	97s	77s	39s	70s	78s	39s	51s	
Meter reading accuracy	Number of cancelled bills / number of meters deployed in the field	Cancel / Rebills	1,595	2,092	2,422	2,134	2,180	2,360	1,804	2,005	1,190	1,445	1,667	1,123	
		Meters Deployed	533,035	533,247	533,452	533,640	534,007	534,347	534,677	535,019	535,394	536,070	536,769	537,426	
		Accuracy	99.70%	99.61%	99.55%	99.60%	99.59%	99.56%	99.66%	99.63%	99.78%	99.73%	99.69%	99.79%	
		Average Leak Response	25.62	25.33	25.89	29.47	26.90	25.62	24.93	26.10	26.54	25.43	28.03	28.46	
		Damage Tickets per 1000 customers	25.32	23.61	25.14	28.08	24.86	25.32	23.62	23.05	23.50	24.16	27.50	29.37	
		All Damages (%)	2.80	2.79	2.74	3.16	2.43	2.88	2.86	1.96	2.53	1.13	2.18	1.78	
		Damages excluding hand tools (%)	2.04	1.82	1.87	1.58	1.70	1.31	1.61	1.27	1.46	0.57	1.36	1.30	
		Discontinuation of service notices sent to residential customers	16,141	21,756	24,025	22,681	17,396	12,463	8,355	7,213	7,316	7,105	7,929	10,773	
		Discontinuances of service to residential customers	1,014	1,237	1,370	1,744	1,672	1,263	1,274	1,177	924	1,121	837	602	
		Residential customers with installment payment plans	23	25	575	62	71	48	42	20	12	3	5	8	
		Installment payment plans in effect at the end of each month	25	33	49	468	365	247	138	117	64	49	45	35	
		Active customer accounts that are eligible for LIHEAP assistance/# of LIHEAP payments received	1,474	1,630	770	572	334	230	215	173	165	1,545	1,330	1,241	
		LIHEAP protected accounts in effect at the end of each month	6,588	7,928	0	0	0	0	0	0	0	0	2,770	4,125	



Phone 505-697-3832
Fax 505-697-4487

June 30, 2020

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
1120 Paseo de Peralta
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

**RE: New Mexico Gas Company, Inc.'s 2019 Quality of Service Annual Report
NMPRC Case No. 15-00327-UT**

Dear Ms. Sandoval:

Enclosed herewith is New Mexico Gas Company, Inc.'s ("NMGC") 2019 Quality of Service Annual Report for the period of January 1, 2019 through December 31, 2019. This filing is being provided pursuant to paragraph 13 of the Stipulation, dated April 11, 2016 that was approved by the New Mexico Public Regulation Commission, in Case No. 15-00327-UT, which provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3832.

Sincerely,

/s/ Rebecca Carter

Rebecca Carter
Manager, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Brad Borman– NMPRC
Mr. Raj Solomon – NMPRC

2019 Quality of Service Annual Report
NMPRC Case 15-00327-UT

Metrics		Definition	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Yearly Total		
Number of customer complaints per 1,000 customers	Those matters received from customers by the Consumer Relations Division of the Commission and forwarded to NMGC for response or resolution	Complaints Customers	1	1	0	1	1	0	0	0	0	0	3	0	7		
			530,242	530,676	530,952	530,781	530,288	529,903	529,605	529,687	529,515	530,322	532,368	533,574			
		Complaints / 1,000 customers	0.0002%	0.0002%	0.0000%	0.0002%	0.0002%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0006%	0.0000%			
		Billing - High Bill	1														
		Billing - Estimate															
		Billing - Metering															
		Billing - Transfer															
		Billing - Other	1														
		Service - Extension				1							1				
		Service - Disconnect															
Total number of customer complaints reported by categories of complaints	Complaints categorized by primary keyword used by the Consumer Relations Division of the Commission	Non-Payment															
		Other Reasons															
		Service - Interruption					1							1			
		Service - Repairs / Delays															
		Service - Dissatisfied															
		Service - Treatment															
		Service - Missed Commitment															
		Service - Other															
		Service - Easement/Right of Way															
		Danger - Gas Leak															
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total customer calls	NMGC target: 70% of calls answered within 60 seconds	Danger-Other															
		Other - Fees															
		Other - Deposit												1			
		Harass															
		Service Level															
		Average time (s) for answering calls	80	57	52	27	21	28	21	21	29	52	61	42	73		
		Average Speed of Answer	89.00%	93.68%	93.62%	98.09%	98.91%	96.42%	98.46%	97.50%	95.64%	93.11%	96.57%	90.63%			
		Meter reading accuracy	Number of cancelled bills / number of meters deployed in the field	Cancel / Rebills	1,676	1,523	2,107	2,607	2,325	1,455	2,131	2,109	6,451	2,476	2,892	129,024	
				Meters Deployed	537,460	537,758	537,920	538,034	538,336	538,533	538,880	539,237	539,524	540,082	540,685	540,989	
				Accuracy	99.69%	99.72%	99.61%	99.52%	99.57%	99.73%	99.60%	99.61%	98.80%	98.80%	99.54%	99.47%	76.15%
Inside Leaks	27.33			26.87	26.42	26.10	25.93	25.70	25.55	25.55	25.61	25.67	25.75	25.96	26.12		
Damage Tickets	Average Leak Response	Outside Leaks	25.41	25.29	25.21	25.14	24.73	24.57	24.59	24.69	24.76	24.81	25.00	26.85			
		Damage Tickets per 1000 customers	1.82	2.43	2.01	2.38	2.34	3.38	1.63	2.02	3.19	3.13	2.26	3.69			
		Damages excluding hand tools (%)	1.46	1.98	1.01	1.55	1.78	2.73	1.40	1.79	2.04	2.01	1.70	2.92			
Number of disconnects per month and identify the number that were for non-payment	Discontinuance of service notices sent to residential customers	Disconnect Notices	13,379	24,359	19,035	18,559	18,304	11,022	6,812	8,548	9,420	7,669	7,196	11,322			
		Discontinuances of service to residential customers	1,097	1,101	1,307	1,432	1,503	1,139	1,204	1,313	1,367	1,479	599	583			
		Residential customers with installment payment plans	5	13	364	52	52	58	24	18	12	10	5	2			
		Installment payment plans in effect at the end of each month	22	21	37	318	235	132	114	88	64	39	26	10			
Number of residential customers with installment agreements by month	Active customer accounts that are eligible for LIHEAP assistance/# of LIHEAP payments received	Eligible Customers	1,525	1,005	864	496	408	267	211	195	236	1,739	1,365	1,246			
		LIHEAP protected accounts in effect at the end of each month	4,125	7,160	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3,001	2,460		



Phone 505-697-3832
Fax 505-697-4487

June 30, 2021

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

**RE: New Mexico Gas Company, Inc.'s 2020 Quality of Service Annual Report
NMPRC Case No. 15-00327-UT**

Dear Ms. Sandoval:

Pursuant to 1.2.2.10B NMAC requiring electronic filings, New Mexico Gas Company, Inc.'s ("NMGC") hereby submits in PDF format its 2020 Quality of Service Annual Report for the period of January 1, 2020 through December 31, 2020. This filing is being provided pursuant to paragraph 13 of the Stipulation, dated April 11, 2016 that was approved by the New Mexico Public Regulation Commission, in Case No. 15-00327-UT, which provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3832.

Sincerely,

/s/ Rebecca Carter

Rebecca Carter
Manager, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Brad Borman– NMPRC

New Mexico Gas Company, Inc.															
2020 Quality of Service Annual Report NMPRC Case No. 15-00327-UT															
	Definition	Metric	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Yearly Total
Number of customer complaints per 1,000 customers	Those matters received from customers by the Consumer Relations Division of the	Complaints	0	0	1	0	0	0	0	0	1	0	0	1	3
		Customers	530,095	530,540	530,875	531,535	532,048	532,437	532,821	533,296	533,747	534,374	535,496	536,430	
		Complaints / 1,000 customers	0.0000%	0.0000%	0.0002%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0002%	0.0000%	0.0000%	0.0002%	
		Billing - High Bill													
		Billing - Estimate													
		Billing - Metering			1										
		Billing - Transfer													
		Billing - Other									1				
		Service - Extension													
		Service - Disconnect													
Total number of customer complaints reported by categories of complaints.	Complaints categorized by primary keycode used by the Consumer Relations Division of the Commission	Non-Payment													
		Other Reasons													
		Service - Interruption													
		Service - Repairs / Delays													
		Service - Dissatisfied													
		Service - Treatment													
		Service - Missed Commitment													
		Service - Other													
		Service - Easement/Right of Way													1
		Danger - Gas Leak													
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total customer calls		Danger - Other													
		Other - Fees													
		Other - Deposit													
		Tariffs													
		Service Level	79.00%	92.00%	95.50%	96.42%	97.32%	98.14%	95.92%	95.89%	94.46%	91.65%	92.35%	94.90%	
		Average Speed of Answer	99	68	51	40	35	39	46	49	61	71	66	50	
		Number of cancelled bills / number of meters deployed in the field	24,819	1,769	1,999	1,842	1,872	2,826	4,307	2,611	2,042	2,067	2,130	1,518	
		Meters Deployed	534,632	535,065	535,472	535,988	536,371	536,831	537,538	537,629	538,095	539,127	539,837	540,757	
		Accuracy	95.36%	99.67%	99.63%	99.66%	99.65%	99.47%	99.19%	99.51%	99.62%	99.62%	99.61%	99.72%	
		Inside Leaks	27.87	28.18	27.43	26.96	26.91	28.36	28.20	27.89	27.52	27.53	27.48	27.44	
Leak Response	Average Leak Response	Outside Leaks	25.15	25.23	24.86	24.66	24.86	25.26	25.60	25.53	25.63	26.42	26.48	26.85	
	Damage Tickets per 1000 customers	All Damages (%)	2.35	2.76	2.68	2.47	3.37	3.07	2.57	2.80	3.22	2.75	3.71	3.39	
	Damage Tickets	Damages excluding hand tools (%)	1.57	1.79	2.19	1.53	2.28	2.50	1.87	1.75	2.47	1.83	2.78	2.91	
	Discontinuance of service notices sent to residential customers	Disconnect Notices	14,629	18,410	13,139	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	Discontinuances of service to residential customers	Disconnect for Non-Payment	988	1,045	615	0	0	0	0	0	0	0	0	0	
	Residential customers with installment payment plans	Installment payment plans set up in the month	9	8	375	300	35	110	64	48	29	25	29	139	
	Active customer accounts that are eligible for LIHEAP assistance/# of LIHEAP payments received	Installment payment plans in effect at the end of each month	10	23	53	487	281	144	150	145	105	85	40	78	
	Number of residential customers with installment agreements by month	Eligible Customers													
	Number of customers that are in the billing system by month that are qualified by HSD	LIHEAP protected accounts in effect at the end of each month	1,351	1,125	640	648	209	147	122	115	142	1,078	971	1,492	
			5,701	7,390										2,439	4,107



Phone 505-697-3832
Fax 505-697-4487

June 30, 2022

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

**RE: New Mexico Gas Company, Inc.'s 2021 Quality of Service Annual Report
NMPRC Case No. 15-00327-UT**

Dear Ms. Sandoval:

New Mexico Gas Company, Inc.'s ("NMGC") hereby submits in PDF format its 2021 Quality of Service Annual Report for the period of January 1, 2021 through December 31, 2021. This filing is being provided pursuant to paragraph 13 of the Stipulation, dated April 11, 2016 that was approved by the New Mexico Public Regulation Commission, in Case No. 15-00327-UT, which provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3832.

Sincerely,

/s/ Rebecca Carter

Rebecca Carter
Interim Director, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Brad Borman– NMPRC
Certificate of Service

New Mexico Gas Company, Inc.

2021 Quality of Service Report

		Definition	Metric	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Yearly Total
Utility Metrics	Number of customer complaints per 1,000 customers	Those matters received from customers by the NMPRC Consumer Relations Division and forwarded to the utilities for response or resolution	Complaints	0	2	1	1	0	0	1	0	2	1	1	0	9
			Customers	540,883	541,486	541,806	542,102	542,141	542,190	542,119	542,121	541,044	541,145	543,586	542,454	
			Complaints / 1,000 customers	0.0000%	0.0004%	0.0002%	0.0002%	0.0000%	0.0000%	0.0002%	0.0000%	0.0004%	0.0002%	0.0002%	0.0000%	
			Billing - High Bill			1	1			1						
			Billing - Estimate													
			Billing - Metering													
			Billing - Transfer													
			Billing - Other							1						
			Service - Extension													
			Service - Disconnect													
Total number of customer complaints reported by categories of complaints.		Complaints categorized by primary keycode used by the Consumer Relations Division of the Commission	Non-Payment													
			Other Reasons													
			Service - Interruption													
			Service - Repairs / Delays													
			Service - Dissatisfied													
			Service - Treatment													
			Service - Missed Commitment											1		
			Service - Other		2											
			Service - Easement/Right of Way													
			Danger - Gas Leak													
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total Average time (s) for answering calls	NMGC target: 70% of calls answered within 60 seconds	Service Level	Danger-Other													
			Other - Fees													
			Other - Deposit													
			Tariffs				1					1				
Meter reading accuracy	Average Speed of Answer (seconds)			70s	41s	73s	95s	89s	46s	112s	78s	27s	54s	46s	82s	
Leak Response	Number of cancelled bills / number of meters deployed in the field		Cancel / Rehills	1,605	1,832	1,640	1,936	1,934	1,817	2,346	3,018	2,679	2,228	2,183	2,541	
			Meters Deployed	544,089	544,421	543,644	544,982	544,202	545,558	545,861	546,129	546,394	546,919	547,427	547,873	
			Accuracy	99.71%	99.66%	99.70%	99.64%	99.64%	99.67%	99.57%	99.45%	99.51%	99.59%	99.60%	99.54%	
Damage Tickets	Average Leak Response		Inside Leaks (minutes)	27.44	27.22	26.65	26.14	26.43	26.44	26.39	26.39	26.38	26.49	26.47	26.51	
			Outside Leaks (minutes)	26.85	26.92	26.46	26.37	25.83	25.72	25.62	25.40	25.60	25.68	25.94	25.99	
			All Damages (%)	2.82	2.89	2.52	1.50	4.05	3.17	2.61	2.76	2.78	2.30	3.51	2.10	
			Damages excluding hand tools (%)	1.78	2.06	1.64	0.92	2.70	2.23	1.74	1.88	2.02	1.62	2.49	1.45	
Number of disconnects per month and identify the number that were for non-residential customers with installment agreements by month	Discontinuance of service notices sent to residential customers	Discontinuances of service to residential customers	Disconnect Notices	0	0	0	0	0	0	0	25,377	17,222	20,368	19,898	24,706	
Number of residential customers with installment agreements by month	Discontinuities of service to residential customers	Residential customers with installment payment plans	Disconnect for Non-Payment	0	0	0	0	0	0	0	829	1,427	1,006	822	535	
Number of customers that are in the billing system by month that are qualified by HSD	Residential customers with installment payment plans	Installment payment plans in effect at the end of each month	Installment payment plans set up in the month	104	136	123	223	446	891	2,104	3,963	2,466	2,451	1,791	1,620	
Number of customers that are in the billing system by month that are qualified by HSD	Active customer accounts eligible based on LIHEAP payments received	Number of LIHEAP Payments Received	Installment payment plans in effect at the end of each month	617	712	625	793	1,228	1,375	2,924	5,228	5,458	4,713	4,596	4,130	
Number of customers that are in the billing system by month that are qualified by HSD	Winter Moratorium (LIHEAP) protected accounts at the end of each month	Number of LIHEAP Payments Received	Number of LIHEAP Payments Received	2,195	1,096	604	313	338	349	175	285	225	1,289	1,400	1,262	
Number of customers that are in the billing system by month that are qualified by HSD	Winter Moratorium (LIHEAP) protected accounts at the end of each month	Number of LIHEAP Payments Received	Winter Moratorium (LIHEAP) protected accounts at the end of each month	4,107	6,140	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	3,048	5,638	



Phone 505-697-3832
Fax 505-697-4487

June 29, 2023

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

**RE: New Mexico Gas Company, Inc.'s 2022 Quality of Service Annual Report
NMPRC Case No. 15-00327-UT**

Dear Ms. Sandoval:

New Mexico Gas Company, Inc.'s ("NMGC") hereby submits its Annual Quality of Service Report for the period ending December 31, 2022, pursuant to paragraph 13 of the Stipulation, in the New Mexico Public Regulation Commission's Case No. 15-00327-UT, which was approved on April 11, 2016. Paragraph 13 of the Stipulation provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3832.

Sincerely,

/s/ Rebecca Carter

Rebecca Carter
Manager, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Ed Rilkoff - NMPRC
Certificate of Service



Phone 505-697-3831
Fax 505-697-4487

June 28, 2024

Ms. Melanie Sandoval
New Mexico Public Regulation Commission
P. O. Box 1269
Santa Fe, New Mexico 87504-1269

**RE: New Mexico Gas Company, Inc.'s 2023 Quality of Service Annual Report
NMPRC Case No. 15-00327-UT**

Dear Ms. Sandoval:

New Mexico Gas Company, Inc.'s ("NMGC") hereby submits its Annual Quality of Service Report for the period ending December 31, 2023, pursuant to paragraph 13 of the Stipulation, in the New Mexico Public Regulation Commission's Case No. 15-00327-UT, which was approved on April 11, 2016. Paragraph 13 of the Stipulation provides:

"NMGC agrees to continue filing specific customer of service reports as ordered in Case No. 09-00163-UT (expired June 2013), and agrees to include in this filing supplemental customer service reports regarding leak response time and damages per 1,000 locate ticket requests."

If you have any questions regarding this information, please call me at (505) 697-3831.

Sincerely,

/s/ Lisa Trujillo

Lisa Trujillo
Project Manager, Regulatory Affairs

cc: Mr. Tim Martinez – NMPRC
Mr. Ed Rilkoff - NMPRC
Certificate of Service

New Mexico Gas Company, Inc.
2023 Quality of Service
NMPRC Case No. 15-00327-UT
For the Period Ending December 31, 2023

Utility Metrics		Definition	Metric	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Yearly Total	
Number of customer complaints per 1,000 customers	Those matters received from customers by the NMPRC Consumer Relations Division and forwarded to the utilities for response or resolution	Complaints		16	5	6	4	1	1	1	0	1	3	2	2	42	
		Customers	545,774	546,214	546,378	546,138	545,739	545,329	545,038	544,950	545,021	545,394	546,723	547,751			
		Complaints / 1,000 customers	0.0029%	0.0009%	0.0011%	0.0007%	0.0002%	0.0002%	0.0002%	0.0000%	0.0002%	0.0006%	0.0004%	0.0004%			
		Billing - High Bill	1	1	1						1						
		Billing - Estimate															
		Billing - Metering															
		Billing - Transfer															
		Billing - Other	11	3	3		1	1				1		1			
		Service - Extension															
		Service - Disconnect			1	2								1	1		
Total number of customer complaints reported by categories of complaints.	Complaints categorized by primary keycode used by the Consumer Relations Division of the Commission	Non-Payment															
		Other Reasons															
		Service - Interruption															
		Service - Repairs / Delays															
		Service - Dissatisfied	2			1			1			2					
		Service - Treatment															
		Service - Missed Commitment															
		Service - Other				1								1			
		Service - Easement/Right of Way															
		Danger - Gas Leak															
Number of customer calls answered by the Call Center within one minute or a lesser time period as a percentage of total	NMGC target: 70% of calls answered within 60 seconds	Danger-Other															
		Other - Fees															
		Other - Deposit															
		Tariffs	2	1	1												
Average time (s) for answering calls	Average Speed of Answer (seconds)	Service Level	31.07%	31.17%	39.73%	72.41%	93.00%	92.42%	97.40%	97.93%	97.93%	96.27%	87.00%	90.06%	82.21%		
Meter reading accuracy	Number of cancelled bills / number of meters deployed in the field	Average Speed of Answer (seconds)	897	930	570	202	56	64	28	24	31	81	62	118			
		Cancel / Rebills	4,173	3,622	2,637	2,503	2,989	2,488	3,530	4,085	3,717	3,423	3,077	2,547			
		Meters Deployed	551,307	551,424	551,447	551,512	551,648	551,847	551,987	552,185	552,328	552,737	551,690	553,791			
		Accuracy	99.24%	99.34%	99.52%	99.55%	99.46%	99.55%	99.36%	99.26%	99.33%	99.38%	99.44%	99.54%			
Leak Response	Average Leak Response	Inside Leaks (minutes)	31.10	27.23	25.89	26.63	27.41	28.42	27.99	28.08	25.60	27.30	24.52	26.68			
		Outside Leaks (minutes)	27.43	26.22	23.81	24.58	26.00	27.83	22.11	23.18	27.05	25.27	26.48	27.81			
		All Damages (%)	1.96	2.26	1.67	2.70	2.01	3.60	1.69	2.83	3.79	3.73	2.77	2.29			
		Damages excluding hand tools (%)	1.66	1.81	1.56	1.42	1.66	2.11	1.26	1.96	2.43	2.98	2.16	3.87			
Damage Tickets	Discontinuance of service notices sent to residential customers	Disconnect Notices	38,240	44,594	45,754	46,933	28,531	38,597	19,865	18,711	18,108	24,013	20,179	24,508			
		Disconnect for Non-Payment	797	858	992	1,059	894	1,012	955	715	740	730	490	377			
		Installment payment plans set up in the month	759	1,155	3,246	1,690	1,308	932	556	359	58	49	38	18			
		Installment payment plans in effect at the end of each month	1,373	1,705	2,390	3,960	4,082	3,518	2,653	2,445	1,546	1,016	648	424			
		Number of LIHEAP Payments Received	928	1,103	1,500	1,011	781	408	321	234	136	283	370	535			
		Winter Moratorium (LIHEAP) protected accounts at the end of each month	10,342	11,815	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1,283	1,829			

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE JOINT APPLICATION
FOR APPROVAL TO ACQUIRE
NEW MEXICO GAS COMPANY, INC.
BY SATURN UTILITIES HOLDCO, LLC.**

Docket No. 24-00266-UT

JOINT APPLICANTS

ELECTRONICALLY SUBMITTED AFFIRMATION OF

RYAN A. SHELL

In accordance with 1.2.2.35(A)(3) NMAC and Rule 1-011(B) NMRA, Ryan A. Shell, President for New Mexico Gas Company, Inc., affirms and states under penalty of perjury under the laws of the State of New Mexico: I have read the foregoing Rebuttal Testimony and Exhibits. I further affirmatively state that I know the contents of my Rebuttal Testimony and Exhibits and they are true and accurate based on my personal knowledge and belief.

SIGNED this 16th day of May 2025.

/s/Ryan A. Shell

Ryan A. Shell

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE JOINT
APPLICATION FOR APPROVAL TO
ACQUIRE NEW MEXICO GAS COMPANY,
INC. BY SATURN UTILITIES HOLDCO,
LLC.**

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)
)
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)
)

Case No. 24-00266-UT

JOINT APPLICANTS

CERTIFICATE OF SERVICE

I CERTIFY that on this date I sent via email a true and correct copy of *Rebuttal Testimony and Exhibits of Ryan A. Shell*

NM Gas Company	
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Brian J. Haverly	BJH@jkwlawyers.com ;
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BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**Rebuttal Testimony and
Exhibits of Ryan A. Shell**

Case No. 24-00266-UT

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Hearing Examiners Division	
Patrick Schaefer Co-Hearing Examiner	Patrick.Schaefer@prc.nm.gov ;
Ana C. Kippenbrock, Law Clerk	Ana.Kippenbrock@prc.nm.gov ;

DATED this May 16, 2025.

/s/Anita Hart

Anita Hart

Director, Regulatory Affairs

505-697-3838

anita.hart@nmgeo.com