



**Date:** 09 November 2020

**To:** EPC Chair Serrano  
Vice Chair Shaffer  
Commissioner Cruz  
Commissioner Meadows  
Commissioner Hollinger  
Commissioner Eyster  
Commissioner Stetson  
Commissioner MacEachen

**From:** Russell Brito, Land Use & Permitting Administrator

**RE:** EPC 48-hour Rule Comments for November 12, 2020 Public Hearing

**PR-2020-004447/SI-2020-001023 – Site Plan – EPC, Group Orion, Gibson/Girard**

PNM supports the applicant's application for approval of a Site Plan – EPC and agrees with the staff recommendation for approval. PNM requests that the wording for recommended finding **16.B.** be adjusted as follows:

- B. Policy 12.4.5- Facility Plans: Develop, update, and implement facility plans for infrastructure systems, such as drainage, electric transmission, natural gas, and information technology that benefit from cross-agency and public-private coordination.

Because it would create additional electric energy needs, the request would necessitate coordination with the energy provider (PNM) regarding capacity and service expansion to accommodate the use. ~~This could be substation expansion and/or new substations and electric transmission lines, which would necessitate an amendment to the Electric Facilities Plan.~~ per the approval processes and standards of the ***Facility Plan: Electric System Transmission and Generation (2010 – 2020)***.

PNM also requests that the wording for recommended finding **21** be adjusted as follows:

- 21. This site plan and its proposed uses will require new substation capacity to serve its electricity demand, including a new transmission corridor and a substation that are interrelated to a developer-initiated project that has gone through a public involvement process and approved by the Environmental Planning Commission. The approval processes and standards of the ***Facility Plan: Electric System Transmission and Generation (2010 – 2020)*** will apply to these necessary electric facilities.