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**25-00054-UT - 2025.12.11 - Staff - Motion for Extension of Deadline for Staff Response**

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**From** Martinez-Rael, Peggy, PRC <Peggy.Martinez-Rael@prc.nm.gov>

**Date** Thu 12/11/2025 8:10 AM

**To** Records, PRC, PRC <PRC.Records@prc.nm.gov>

**Cc** pdomenici@domicilaw.com <pdomenici@domicilaw.com>; echoandmelody@gmail.com <echoandmelody@gmail.com>; Bogatko, John, PRC <John.Bogatko@prc.nm.gov>; Ortiz, Jackie, PRC <jackie.ortiz@prc.nm.gov>; Ramirez, Elizabeth, PRC <Elizabeth.Ramirez@prc.nm.gov>; Martinez-Rael, Peggy, PRC <Peggy.Martinez-Rael@prc.nm.gov>; Khoury, Cholla , PRC <cholla.khoury@prc.nm.gov>; Rilkoff, Ed , PRC <Ed.Rilkoff@prc.nm.gov>; Dasheno, Gabriella, PRC <Gabriella.Dasheno@prc.nm.gov>; Martinez, Timothy, PRC <Timothy.Martinez@prc.nm.gov>; Orland Whitney, PRC <orland.whitney@prc.nm.gov>; Fillion, Kai , PRC <kai.fillion@prc.nm.gov>; Kerolle, McLee , PRC <mclee.kerolle@prc.nm.gov>; Santillanes, LaurieAnn , PRC <LaurieAnn.Santillanes@prc.nm.gov>; Herrera-Waldroup, Alyssa, PRC <alyssa.herrera-waldroup@prc.nm.gov>; Schaefer, Patrick, PRC <patrick.schaefer@prc.nm.gov>; Kippenbrock, Ana, PRC <Ana.Kippenbrock@prc.nm.gov>; Kreienkamp, John , PRC <john.kreienkamp@prc.nm.gov>; Bogatko, John, PRC <John.Bogatko@prc.nm.gov>; Ramirez, Elizabeth, PRC <Elizabeth.Ramirez@prc.nm.gov>

 1 attachment (361 KB)

25-00054-UT - 2025.12.11 - Staff - Motion for Extension of Deadline and COS.pdf;

Attached is the **Motion for Extension of Deadline for Staff Response** in Case No. 25-00054-UT, electronically filed today.

Peggy Martinez-Rael  
Paralegal  
NM Public Regulation Commission  
[Peggy.Martinez-Rael@prc.nm.gov](mailto:Peggy.Martinez-Rael@prc.nm.gov)  
505-231-9490



**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

<b>IN THE MATTER OF MELODY RANCH</b>	)	
<b>WATER COMPANY LLC’S WATER SYSTEM</b>	)	<b>Docket No. 25-00054-UT</b>
<b>BREAKDOWN AND DISRUPTION OF SERVICE</b>	)	
_____	)	

**MOTION FOR EXTENSION OF DEADLINE FOR STAFF RESPONSE**

The Utility Division Staff (“Staff”) of the New Mexico Public Regulation Commission (“Commission”, “NMPRC” or “PRC”) hereby submits this Motion<sup>1</sup> for Extension of Deadline for Staff Response, and would show the Commission the following:

1. On December 9, 2025, the presiding hearing examiner in this docket entered an order directing Staff to file a report by Friday, December 12, 2025 (three days’ time), containing the following information:

- a. Historical averages of water usage for October and November;
- b. Actual water usage for October and November 2025; and
- c. An estimated timeline of how long the emergency funds provided through state funds<sup>2</sup> will last, taking into consideration both past and current (October and November 2025) monthly usage rates.

2. As noted during the previous status conference, Staff has access to certain data regarding Melody Ranch water usage. To be specific, Melody Ranch previously disclosed to Staff its monthly usage totals between October 2024 and February 2025. Staff also has information (provided by Melody Ranch) as to the estimated cost of water hauling. Melody Ranch itself, however, presumably has additional data the Commission could request.

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<sup>1</sup> In accordance with 1.2.2.12(A)(3) NMAC, Staff contacted Melody Ranch by email on December 10, 2025, to determine whether they oppose this motion. Melody Ranch indicated that it does not oppose the motion.

<sup>2</sup> See Executive Order No. 2025-373 (Oct. 28, 2025).

3. Staff does not, however, have *historical averages* immediately available, and obtaining, analyzing, and summarizing this information may not be possible in the three days' time afforded by the most recent order.

4. To afford Staff enough time to obtain (from Melody Ranch) and evaluate the data necessary to answer the hearing examiner's requests, Staff requests an extension of time for one week, until next Friday, December 19, 2025.

5. Staff will make every effort to satisfy the hearing examiner's December 12, 2025, deadline, even if this motion is granted.

For the reasons outlined above, Staff requests that the December 12, 2025, deadline for Staff's response be extended to December 19, 2024.

Dated this 11<sup>th</sup> day of December, 2025.

Respectfully submitted,

/s/ John Bogatko

John Bogatko, NMPRC Legal Division  
John Kreienkamp, NMPRC Legal Division  
New Mexico Public Regulation Commission  
P.O. Box 1269 | Santa Fe, NM 87504-1269  
Email – [John.Bogatko@prc.nm.gov](mailto:John.Bogatko@prc.nm.gov)  
Email – [John.Kreienkamp@prc.nm.gov](mailto:John.Kreienkamp@prc.nm.gov)

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF MELODY RANCH WATER )**  
**COMPANY LLC’S WATER SYSTEM BREADOWN ) Docket No. 25-00054-UT**  
**AND DISRUPTION OF SERVICE )**  
**)**

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**CERTIFICATE OF SERVICE**

I CERTIFY that on this date I sent a true and correct copy of the **Motion for Extension of Deadline for Staff Response**, to the following:

<b>Echo and Melody Ranch Water Co.</b>	
Pete V. Domenici, Jr.	<a href="mailto:pdomenici@domicilaw.com">pdomenici@domicilaw.com</a> ;
Tracy Padilla	<a href="mailto:echoandmelody@gmail.com">echoandmelody@gmail.com</a> ;
<b>NMPRC -Utility Staff</b>	
John Bogatko	<a href="mailto:John.Bogatko@prc.nm.gov">John.Bogatko@prc.nm.gov</a> ;
Jacqueline Ortiz	<a href="mailto:Jackie.Ortiz@prc.nm.gov">Jackie.Ortiz@prc.nm.gov</a> ;
Elizabeth Ramirez	<a href="mailto:Elizabeth.Ramirez@prc.nm.gov">Elizabeth.Ramirez@prc.nm.gov</a> ;
Peggy Martinez-Rael	<a href="mailto:Peggy.Martinez-Rael@prc.nm.gov">Peggy.Martinez-Rael@prc.nm.gov</a> ;
Cholla Khoury	<a href="mailto:Cholla.Khoury@prc.nm.gov">Cholla.Khoury@prc.nm.gov</a> ;
Ed Rilkoﬀ	<a href="mailto:Ed.Rilkoﬀ@prc.nm.gov">Ed.Rilkoﬀ@prc.nm.gov</a> ;
Gabriella Dasheno	<a href="mailto:Gabriella.Dasheno@prc.nm.gov">Gabriella.Dasheno@prc.nm.gov</a> ;
Timothy Martinez	<a href="mailto:Timothy.Martinez@prc.nm.gov">Timothy.Martinez@prc.nm.gov</a> ;
Orland Whitney	<a href="mailto:Orland.Whitney@prc.nm.gov">Orland.Whitney@prc.nm.gov</a> ;
Kai Fillion	<a href="mailto:Kai.Fillion@prc.nm.gov">Kai.Fillion@prc.nm.gov</a> ;
Mclee Kerolle	<a href="mailto:Mclee.Kerolle@prc.nm.gov">Mclee.Kerolle@prc.nm.gov</a>
<b>NMPRC – General Counsel Division</b>	
LaurieAnn Santillanes	<a href="mailto:Laurieann.Santillanes@prc.nm.gov">Laurieann.Santillanes@prc.nm.gov</a> ;
Alyssa Herrera-Waldroup	<a href="mailto:Alyssa.Herrera-Waldroup@prc.nm.gov">Alyssa.Herrera-Waldroup@prc.nm.gov</a> ;
<b>Hearing Examiners Division</b>	
Patrick Schaefer, Hearing Examiner	<a href="mailto:Patrick.Schaefer@prc.nm.gov">Patrick.Schaefer@prc.nm.gov</a> ;
Ana Kippenbrock, Paralegal	<a href="mailto:Ana.Kippenbrock@prc.nm.gov">Ana.Kippenbrock@prc.nm.gov</a> ;

**DATED** December 11, 2025

**NEW MEXICO PUBLIC REGULATION COMMISSION**

*/s/ Peggy Martinez-Rael (Electronically signed)*

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Peggy Martinez-Rael, Paralegal