

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF PUBLIC INTEREST	)	
ADVOCACY STAFF’S PETITION TO AUTHORIZE	)	Docket No. 26-_____
A FORMAL INVESTIGATION INTO PUBLIC	)	
SERVICE COMPANY OF NEW MEXICO’S	)	
ESTIMATED AND DELAYED BILLING	)	
PRACTICES DURING THE SUMMER OF 2026	)	
	)	

**PETITION TO AUTHORIZE A FORMAL INVESTIGATION INTO
PUBLIC SERVICE COMPANY OF NEW MEXICO’S ESTIMATED
AND DELAYED BILLING PRACTICES DURING THE SUMMER OF 2026**

Beginning in July 2026, Public Service Company of New Mexico (“PNM” or the “Company”) began estimating and delaying ratepayer bills, beginning in the Alamogordo and Ruidoso areas and later expanding into other locations in the Company’s service territory. PNM asserts that this resulted from an acute shortage of meter readers caused by circumstances beyond its control. Having now heard directly from members of the public about the severe financial repercussions of this situation, the Public Interest Advocacy Staff (hereinafter “Staff”) of the New Mexico Public Regulation Commission (the “Commission”) concludes that the public interest requires a thorough examination of this issue’s causes and regulatory solutions. Staff respectfully requests authorization, on the Commission’s behalf, to conduct a formal investigation.¹

Background

PNM informed the Commission on July 20, 2026, that it was experiencing “temporary, unforeseen workforce impacts affecting its meter reading operations in the Alamogordo and

¹ See NMSA 1978, § 62-19-9 (B)(3) (2026) (authorizing the Commission to “conduct investigations as necessary to carry out the commission's responsibilities”); see also 1.2.2.22(A) NMAC (“The commission may at any time investigate any matter within its jurisdiction.”).

Ruidoso service areas.”² The Company explained that these meter reader shortages “could result in PNM rendering a bill based on estimated usage for more than two consecutive billing periods.”³ PNM further stated that it anticipated having replacement personnel in the field within 30 days.

After PNM informed Staff that this issue had expanded across its service territory, Staff met with the Company on August 28, 2026, at the Commission’s Santa Fe office. Staff filed a notice shortly afterward disclosing the information it had received.⁴ In brief, PNM explained that its meter reader shortages stemmed from a series of circumstances, including a shift to a temporary workforce model (which PNM had undertaken in anticipation of its shift to advanced metering infrastructure), as well as unexpected staffing turnover and challenging field conditions. PNM also explained that it pursued short-term solutions to its meter reader shortages, suspended late fees and disconnect for nonpayment for all impacted customers, and made payment plans available. At that time, the Company anticipated stabilizing its meter reading operations by the middle of September 2026. Since then, the information available to Staff indicates that PNM followed through on its promises and stabilized its operations as anticipated across its service territory.⁵

To hear directly from impacted customers, Staff and the Commission held a town hall in Alamogordo on September 29, 2026. Members of the public spoke at this event and attested that this situation has caused severe financial consequences. Staff heard of bills as high as \$1,700 and of families struggling to find a financial path forward. Some attendees also stated that they received

² Docket No. 26-0000147, Public Service Company of New Mexico Commission Notification Pursuant to 17.5.410.15(C) NMAC (Jul. 20, 2026) at 1.

³ *Id.*

⁴ See Docket No. 26-0000147, Notice of Staff Inquiry and Review of Public Service Company of New Mexico Meter Reader Shortages (Aug. 31, 2026).

⁵ Staff understands that PNM is now reading meters on cycle in all of the affected communities, including Alamogordo, Ruidoso, Albuquerque, Bernalillo, and Santa Fe.

unusually high bills in the month immediately following estimated or delayed bills, an experience that Staff is unable to explain at this time. Attendees asked the Commission to commence a formal investigation into this situation to determine its root cause and what measures could be taken to remedy it.

Scope and Purpose of the Requested Investigation

Although, based on the information currently available, PNM has been fully cooperative and forthcoming with Staff's inquiries into this issue to date, Staff concludes that a formal investigation is necessary at this juncture. These estimated and delayed bills have severely impacted many PNM customers, and these impacted communities deserve a full accounting. Staff intends to focus on four specific subjects at the outset of its investigation:

1. What caused this situation?
2. Were customers overcharged as a result of this situation?
3. Did PNM comply with all applicable statutory and regulatory requirements?
4. What regulatory measures or lessons can be learned to prevent this situation from happening again?

To obtain meaningful answers to these questions, Staff requests that the Commission authorize independent meter testing of a sample group of impacted customers.⁶ These customers should be located in the Alamogordo and Ruidoso areas, where the shortages originated and where the impacts appear to be most severe. Staff would propose a statistically significant sample group of meters and request permission to select it, possibly by working with PNM Customers United, a local advocacy group that attended the Alamogordo town hall.

⁶ Staff recommends that the cost of this testing be borne by the utility.

In addition to independent meter testing, Staff should be permitted to utilize the Commission's discovery practices to obtain information from PNM necessary to answer the questions above. Staff intends to solicit additional information from affected customers about their unique situations and then seek information from PNM to determine whether those customers were charged appropriately and in accordance with applicable tariffs, as well as Commission rules regarding adjustment of bills due to failure to timely bill for services.⁷

To ensure robust oversight and full transparency, the Commission's order should require Staff to produce regular status reports and, ultimately, a public report detailing its findings and recommendations. Staff suggests filing status reports monthly. PNM, as well as any interested parties who choose to intervene, should be permitted to either file these status reports jointly with Staff or file their own responses.

Conclusion

PNM's meter reader shortage during the summer of 2026 had significant consequences for many ratepayers and communities across the Company's service territory. Staff strongly believes that the public interest demands a full investigation and real answers about this situation's causes and solutions. As such, Staff respectfully petitions the Commission to authorize a formal investigation in the above-captioned docket.

Respectfully submitted,

Public Interest Advocacy Staff
New Mexico Public Regulation Commission

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⁷ See 17.9.560.12(E)(1)(i) NMAC.

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