



**TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.**

**HEADQUARTERS:** P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

May 17, 2007

Lany Weaver and Brad Musick  
New Mexico Environment Department  
Air Quality Bureau  
2048 Galisteo  
Santa Fe, NM 87505

Re: Draft New Mexico Greenhouse Gas Reporting Regulation

Dear Ms. Weaver and Mr. Musick:

Tri-State Generation and Transmission Association, Inc. (Tri-State) is a wholesale electric power supplier owned by the 44 electric cooperatives that it serves. Tri-State generates and transports electricity to its member systems throughout a 250,000 square-mile service territory across Colorado, Nebraska, New Mexico, and Wyoming. Tri-State owns and operates the coal-fired Escalante Generating Station located near Pruitt, NM and four simple cycle dual fuel (natural gas and diesel) combustion turbines at the Pyramid Generating Station near Lordsburg, NM. Tri-State will be subject to the greenhouse gas reporting regulations that are being developed by the New Mexico Environment Department (NMED).

Tri-State has appreciated the opportunity to participate in your open stakeholder process concerning greenhouse gas reporting. We offer the following comments for your consideration regarding draft regulatory language that was first distributed by NMED on April 24, 2007.

1. Section 7, Definitions: Clarification needs to be provided to distinguish between entity-wide and facility reporting. Tri-State favors reporting on a facility basis.
2. Section 7, Definitions: Direct emissions needs to be clearly defined. Currently only mobile sources are mentioned for exemption, but others should be considered, i.e., fugitives. De minimus levels, i.e., a certain percentage of a facility's total emissions should also be considered.
3. Section 202 – During power plant sub-committee discussions it has been unclear whether SF<sub>6</sub> emissions from transmission equipment owned by a utility would need to be reported in Phase II. This needs to be clarified. Tri-State supports reporting for emissions at generation sites.
4. Section 301 – The current language should be strengthened concerning the exemption from the New Mexico process being proposed for those choosing to participate in the multi-state registry.



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5. Section 302 – During the Stakeholder Meeting on April 24, 2007, a NMED representative stated that proposed procedures would need to be made available to the regulated community by September 1<sup>st</sup> to be approved by January 1. Consider changing language to 120 days.
6. Section 302 – Provide the flexibility to use nationally accepted protocols that are used in the multi-state registry program in lieu of state protocols.

Thank you for this opportunity to provide comments. Please contact Martin Rehm or me if you have questions concerning this letter.

Sincerely,

Barbara A. Walz  
Vice President  
Environmental

BAW:MAR:pvt

cc: Mac McLennan  
Jerry A. Walker