



STATE OF NEW MEXICO
ENVIRONMENTAL IMPROVEMENT BOARD

IN THE MATTER OF THE PROPOSED)
REVISION TO THE STATE IMPLEMENTATION)
PLAN FOR THE SAN JUAN GENERATING)
STATION BEST AVAILABLE RETROFIT)
TECHNOLOGY DETERMINATION)
_____)

No. EIB 13-02 (R)

MOTION FOR LEAVE TO INTERVENE AND ENTRY OF APPEARANCE

COMES NOW the New Mexico Industrial Energy Consumers ("NMIEC") by and through its attorney, Peter J. Gould, and pursuant to 20.1.1.300 NMAC and 20.1.1.303 NMAC, moves the New Mexico Environmental Improvement Board ("EIB" or "Board") for leave to intervene in the above-captioned matter and for expansion of the service list to include NMIEC's attorney. As grounds for this Motion, NMIEC states:

1. NMIEC is an organization comprised of large and industrial electricity consumers who are customers of Public Service Company of New Mexico ("PNM").
2. The subject matter and outcome of this proceeding will have an effect on the electric service and rates of the NMIEC Members.
3. NMIEC seeks to intervene and file its entry of appearance in this matter in order to present relevant non-technical data, views, and arguments, and to examine witnesses. No other party can adequately represent the interests of NMIEC in this matter.
4. NMIEC requests that it be served by mail and email with copies of all documents, including technical testimony, entries of appearance, motions filed by any party and any notices and determinations issued by the Board in this matter. Service should be provided to:

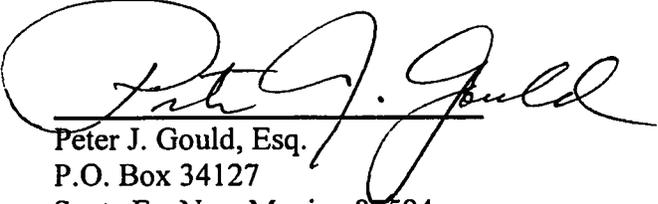
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5. On information and belief, NMIEC does not believe that this Motion and Entry of Appearance will be contested by any party to this docket.

WHEREFORE, the New Mexico Industrial Energy Consumers pray for leave to intervene in and become a party to this proceeding and for such other and further relief as the Board deems just and proper.

Respectfully submitted this 30th day of July, 2013.



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CERTIFICATE OF SERVICE

This will certify this Response of New Mexico Industrial Energy Consumers' Motion for Leave to Intervene and Entry of Appearance was filed with the New Mexico Environmental Improvement Board on the 30th day of July 2013 and that copies of the foregoing were mail and emailed on the same date to:

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