

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE FILING)
OF ADVICE NOTICE NO. 69)
BY SOCORRO ELECTRIC)
COOPERATIVE, INC.)
SOCORRO ELECTRIC)
COOPERATIVE, INC.,)
Applicant.)**

Case No. 18-00383-UT

DECLARATION OF

OF

**MICHAEL THOMPSON
MERIDIAN COOPERATIVE, INC.**

IN SUPPORT OF

**THE SOCORRO ELECTIC COOPERATIVE, INC.'S
SECOND EMERGENCY MOTION TO STAY TO PREVENT
IMPOSITION OF THE REQUIREMENTS OF THE REVISED
COMPLIANCE ORDER, ETC., ISSUED MARCH 30, 2022**



April 5, 2022

Meridian Cooperative, Inc., declares under penalty of perjury the following:

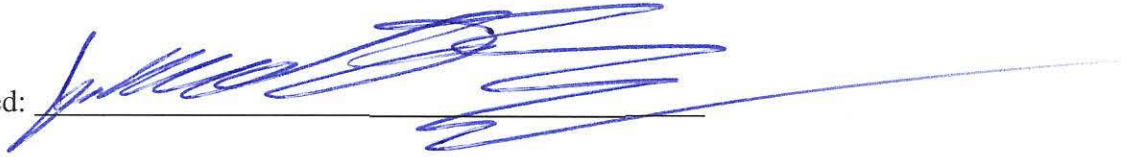
1. My name is Michael Thompson. I am employed as the COO of Meridian Cooperative, Inc. (Meridian Cooperative), the company that contracts with The Socorro Electric Cooperative (SEC) to provide the system services to the SEC to maintain their members' records. I have personal knowledge of the facts set forth herein, and I am competent to testify.
2. SEC contacted Meridian Cooperative to determine the cost and complexity of what it would take to calculate and regenerate the billing of all of SEC's customers for a prior 30-month periods.
3. SEC has 13,071 customers and the request includes the prior 30 months whereby each month must be reviewed. To do this Meridian Cooperative would have to reload every month-end tape, 30 tapes in total, which would take a minimum of 30 hours' time if there were no software changes over this 30-month time frame, which is highly unlikely. When the software changes Meridian Cooperative's DevOps group would have to make changes so that the version of the software always matches up with the version of the database backup. At this time, it is not a given that Meridian Cooperative has the object code stored in such a historical way that 100% assurance can be given that this will meet with success. The number of times this procedure must be addressed is estimated at five times, but that is just a guess. Software is always being updated and patched and without a great deal more investigation, it is impossible to know for sure how many times this may have occurred over the last 30 months because, again, Meridian Cooperative is frequently updating the software with new releases and patches to those releases.
4. The next step would then be to run a billing register for each month during the 30-month period to get the total KWH, KW and number of customers billed. Then Meridian Cooperative would calculate the difference in what was billed versus what could have been billed. This would result in totals for each rate only. There is no practical way to get the difference in each individual account because the meter readings for all 13,071 accounts have already been billed on each month's backup. There is no practical way to re-bill those meter

readings for all 30 months. Meridian Cooperative can provide totals on the kwh, kw, etc. that were billed but Meridian Cooperative cannot re-bill for those months I estimate that these calculations would require a minimum of 70 hours. The word “practical” is used because it would take days just to estimate the work required to calculate each customer billed, which includes changes in taxes. The complexity time factor of such a project is enormous and simply, not practical, if it can even be done at all as the readings are constantly changing during the month.

5. Lastly, Meridian Cooperative is not staffed to engage in this type of work without negatively impacting other customers. Meridian Cooperative does not have qualified staff available to dedicate a contiguous 100 hours to the work required for such a project. However, if Meridian Cooperative were to do the work the **estimated** minimum cost to SEC would be 100 hours at \$150 per hour for a total of = \$15,000.
6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated:

Signed:



Sincerely,

J. Michael Thompson
Meridian Cooperative | COO, Executive
Meridian.coop | MichaelT@meridian.coop
Office: 678-906-2320
Mobile: 404-934-4134

Follow Us On Social Media!

