New Mexico Comprehensive Energy Transition Strategy

Policy Memos - Energy Systems Data and Emissions Reporting

About CETS

The Comprehensive Energy Transition Strategy (CETS) is an initiative of the Energy, Minerals and Natural Resources Department (EMNRD) to develop New Mexico's first integrated roadmap for delivering reliable, affordable, safe, and sustainable energy. Launched in May 2025, the strategy will provide analysis and recommendations to guide near-, mid-, and long-term policy. These Draft Policy Memos form the CETS baseline analysis, combining research on existing policies and regulations with stakeholder engagement across the state legislature, agencies, industry, and advocacy organizations. Phase 2 (October 2025 - June 2026) will feature more extensive engagement and finalized recommendations.

Where New Mexico Stands Today

This context provides the foundation for the Phase I policy memos that follow.

Strong fiscal foundation
oil and gas revenues (currently about 40% of the general fund) and permanent funds that can support economic diversification.

Exceptional energy resources
including solar, wind, geothermal, and existing infrastructure with potential for regional transmission.

Community and workforce expertise
engaged Tribal and local communities, supportive policies, national laboratories, and skilled energy workforce.

Exposure to more extreme weather
increasing heat, droughts, and storms challenge grid resilience, energy reliability, and communities.

Phase 1: Policy Memos

New Mexico has made substantial progress in advancing its energy transition. Building on strong existing efforts, the policy memos in this phase identify strategic opportunities, implementation gaps, and enforcement challenges across nine critical areas:

1. **Innovation in Clean, Firm Power Generation**
Examines clean, firm power options—geothermal, nuclear, carbon capture, hydrogen, hydropower, and long-duration storage—to ensure reliability, affordability, and durable community support, advancing the energy transition.

2. **Grid Modernization**
Investigates how to align New Mexico's grid with its energy transition and economic growth goals and outlines targeted reforms to accelerate deployment and improve resilience.

3. **Electricity Transmission Capacity Expansion**
Examines the planning and permitting challenges that limit timely transmission deployment and outlines potential solutions to support transmission expansion to accelerate the clean energy transition.

4. **Decarbonization of the Building Sector**
Focuses on targeted reforms to strengthen the Sustainable Buildings Tax Credit, making it more equitable, transparent, and effective in driving building decarbonization statewide.

5. **Workforce Readiness and Equitable Opportunity**
Highlights opportunities to improve alignment between policy design and implementation, ensuring that New Mexico's clean energy investments deliver broad, equitable, and lasting economic benefits for its residents.

6. **Policy Implementation**
Examines how enhancing agency capacity, authority, tools, and resources can strengthen effective implementation of New Mexico's energy transition.

7. **Clear Subsurface Authorities and Definitions**
Explores how greater clarity for geologic hydrogen, geothermal, and methane can reduce uncertainty, attract investment, and advance New Mexico's energy transition.

8. **Energy Systems Data and Emissions Reporting**
Identifies data and governance gaps that limit New Mexico's ability to manage its energy transition effectively and outlines how to achieve close to real-time data visibility, evaluate policy impacts, and measure progress.

9. **Investing in the Future: Revenue Diversification**
Considers diversifying New Mexico's revenue base as the energy transition progresses into growing clean energy industries, reducing fiscal volatility, and stabilizing revenues.

Dr. Van Romero
van.romero@nmt.edu

Memo #8: Energy Systems Data and Emissions Reporting: Deploy updated carbon accounting frameworks, streamline reporting requirements, and develop a data management strategy

To: Secretary Melanie Kenderdine, New Mexico Energy, Minerals, and Natural Resources Department
From: The Comprehensive Energy Transition Strategy (CETS) team
Date: October 7, 2025
Subject: Energy Systems Data and Emissions Reporting: Deploy updated carbon accounting frameworks, streamline reporting requirements, and develop a data management strategy

Bottom Line Up Front

New Mexico has made important progress toward data-driven energy and climate policymaking by updating its greenhouse gas (GHG) emission inventories, adopting advanced methane monitoring technologies, and collaborating with research institutions to improve data quality. These initiatives demonstrate a strong commitment to transparency and informed decision-making. However, the state's energy and emissions data remain fragmented across agencies, with heavy reliance on delayed federal sources, limited authority for statewide reporting or verification, and ad hoc, voluntary data sharing between agencies and utilities. As a result, policymakers often lack timely, consistent, and sector-specific information to track progress toward emissions and energy transition goals. This memo identifies the key data and governance gaps that limit New Mexico's ability to manage its energy transition effectively and outlines targeted solutions such as establishing a state-managed, integrated digital platform for energy and emissions data. The platform is part of a larger effort for developing a data management strategy, called the Data for the Energy Transition, Economy, Climate Change, and Technologies (DETECT). DETECT goals would be consolidating existing data, planning for additional data acquisition, creating standardized data-sharing requirements across agencies and utilities; and developing a unified, enforceable greenhouse gas reporting framework that incorporates modern monitoring technologies and more frequent submissions. Building this system would give New Mexico close to real-time visibility needed to plan infrastructure, evaluate policy impacts, and measure progress toward a secure, efficient, and low-carbon energy future.

Issue Statement

Effective energy and climate policy in New Mexico requires a foundation of accurate and timely energy system data—including greenhouse gas (GHG) emissions, energy production and consumption, demand, and grid performance. Policymakers need reliable information not only to identify the state's major emission sources but also to understand overall energy supply, demand, reliability, and efficiency trends, in order to set reduction targets and track progress. Without this information, the state risks adopting goals it cannot measure or enforce.

Today, New Mexico's energy system is both an economic engine and a major source of environmental impact, yet the state lacks a unified, transparent, state-owned framework for collecting, reporting and analyzing energy data. Current reporting on production, consumption, imports and exports, grid reliability, and end-use demand is fragmented across agencies (e.g., Energy, Minerals and Natural Resources Department (EMNRD), New Mexico Environment Department (NMED), New Mexico Economic Development Department (NMEDD), and Department of Workforce Solutions (DWS)) and often relies on federal sources that lag by a year or more. This patchwork approach makes it difficult to fully understand the state's energy flows, identify gaps, or evaluate how policy choices affect system performance and equity. Without consistent, timely, and integrated energy data, New Mexico risks making decisions on infrastructure, development, and resource planning without a complete picture, ultimately undermining the state's ability to make informed decisions and manage its energy transition effectively.

To address these challenges, it is essential that New Mexico build a state-owned and state-managed data strategy and platform. Relying primarily on federal inventories or third-party datasets creates delays, inconsistencies, and gaps that limit the state's ability to respond quickly to emerging issues or design policies tailored to local needs. A state-controlled system would ensure timely updates, data granularity, standardized reporting across sectors, and data sovereignty, allowing policymakers, agencies, and communities to access trusted information that reflects the realities of New Mexico's energy landscape.

In terms of greenhouse gas emissions inventories, New Mexico has made important progress in recent years. The state has partnered with third-party consultants like E3 to produce updated economy-wide GHG emission inventories, including 2021 data and 2030–2050 forecasts, which improve scope and modeling methodology.[1] On methane specifically, the state has advanced leak detection capabilities by approving Bridger Photonics' Gas Mapping LiDAR™ technology under its ALARM program. Operators can now use this aerial system to detect, map, and repair methane leaks, earning compliance credits in the process.[2]

Despite these advances, significant gaps remain. New Mexico currently produces on the order of 60–80 million metric tons of CO_2-equivalent annually, or about 31 tons per person, which is roughly 70% above the U.S. average.[3] High per-capita emissions reflect both intensive oil and gas activity and the state's relatively small population. The oil and natural gas industry is the largest contributor to the state's emissions, driven by carbon dioxide

from fuel combustion and methane released during upstream, midstream, and downstream activities.[4] The transportation sector (cars and trucks) and electricity generation are the next-biggest sources; emissions from residential and commercial buildings, industrial processes, agriculture, and waste comprise the remainder of the state's GHG inventory.[5]

The state briefly implemented a mandatory GHG reporting rule in 2010, but it was repealed in 2012,[6] leaving no enforceable statewide requirement for emitters to report carbon pollution. In practice, GHG emissions data are piecemeal and not collected in real time (or near-real time) – inventories rely on periodic reporting, estimates or federal data that often lag by a year or more. Until systems for tracking indirect or supply-chain emissions are widely deployed and trusted, New Mexico is largely limited to tracking "point source" emissions and relying on industry estimates for everything else.

Agency capacity and tools for managing emissions data are limited, which hinders the state's ability to fully understand emission trends and swiftly target problem areas. A survey participant emphasized, "EMNRD does not have a full picture of energy infrastructure in New Mexico and cannot respond effectively without better data." One state official bluntly said, "you can't manage what you don't measure, and in New Mexico we don't measure much. Almost all the data I use on a day-to-day basis comes from the federal government… It's a huge problem."

Finally, investing in DETECT for comprehensive, state-owned energy data is not just about trust and transparency; it is also about giving policymakers and communities the tools to make smart, data-driven decisions. Production and consumption data are critical for understanding supply-demand balance and planning new generation, transmission, or pipelines; water-energy nexus data are paramount to understand energy sector impact on water supply; imports and exports determine New Mexico's role as an energy exporter and its exposure to market volatility; grid reliability data is essential for keeping the lights on and planning renewable integration; and end-use demand data helps target efficiency programs and direct them to the right sectors. Without this level of detail, policies risk being costly or misaligned with local realities. While building and managing such a system will require upfront investment, the payoff is long-term: reduced risk of stranded assets, better protection of ratepayers, and more credible pathways to meet climate and economic development goals.

New Mexico's progress shows what is possible, but without a unified data strategy and a consolidated reporting system the state lacks the data needed to set credible targets and track progress. A modern, enforceable framework with timely, consistent reporting across agencies is essential to guide climate policy and maintain public trust.

Supporting Analysis

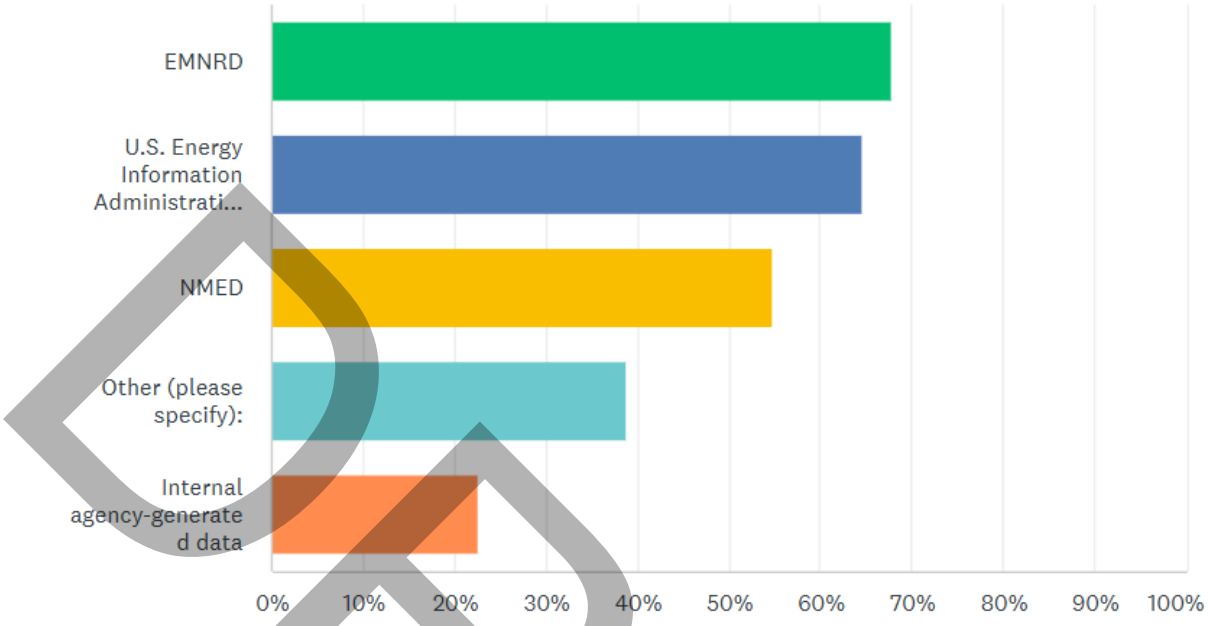
This analysis draws on four primary sources: (1) review of relevant statutes, regulations, and policy frameworks; (2) semi-structured interviews with stakeholders across state agencies, industry, and advocacy groups; (3) survey responses from over 60 stakeholders representing government, industry, community organizations, and research institutions; and (4) a comprehensive review of state and federal databases to assess the availability and quality of energy and emissions data, with a focus on both datasets and associated metadata. An accompanying report provides the detailed results of the comprehensive data review.

The triangulation of these methods highlights progress—such as updated GHG emission inventories and adoption of advanced methane monitoring—and challenges, including fragmented reporting, limited agency capacity, and gaps in public transparency. These findings are described in further detail below.

Building an integrated, state-managed energy data system is essential for New Mexico to understand and manage how energy is produced, delivered, and used across its economy.

Effective energy and climate policymaking in New Mexico depends on accurate, timely, and detailed energy data—yet the systems that collect and share that information remain fragmented, outdated, and inconsistent. Most stakeholders rely first on EMNRD, then NMED, and finally on the U.S. Energy Information Administration (EIA) (see Figure 1 for details).

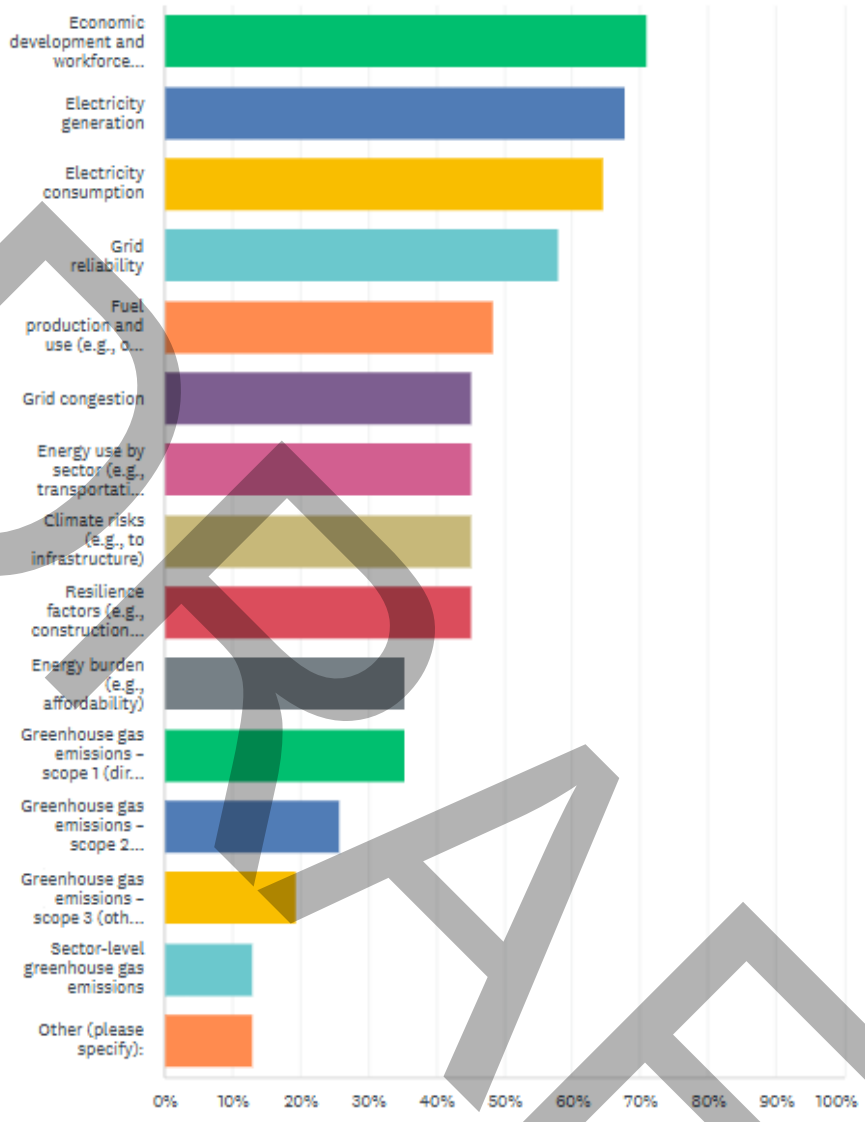
Figure 1. Survey responses to: What are the primary sources of energy- or climate-related data that your organization relies on?



To plan effectively, New Mexico needs a clear foundation of baseline data: supply data showing where energy is produced—whether from fossil fuels, renewables, or imports; demand data showing how energy is used across residential, commercial, industrial, and transportation sectors; and infrastructure data capturing the capacity and constraints of the grid, storage, and pipelines. Together, these datasets form the backbone of any energy transition strategy. In fact, survey respondents noted that sector-level electricity generation (68%) and consumption (65%) data are among the most important for their work (Figure 2).[1]

Figure 2. Survey responses to: Which of the following data categories are most important for your agency's work?

[1] Note: While electricity consumption data is a frequently requested category, generation data from the U.S. DOE's EIA-923 report (available on a three-month lag) is generally more accurate and can be used with emissions factors to estimate monthly GHG emissions from point-source plants.



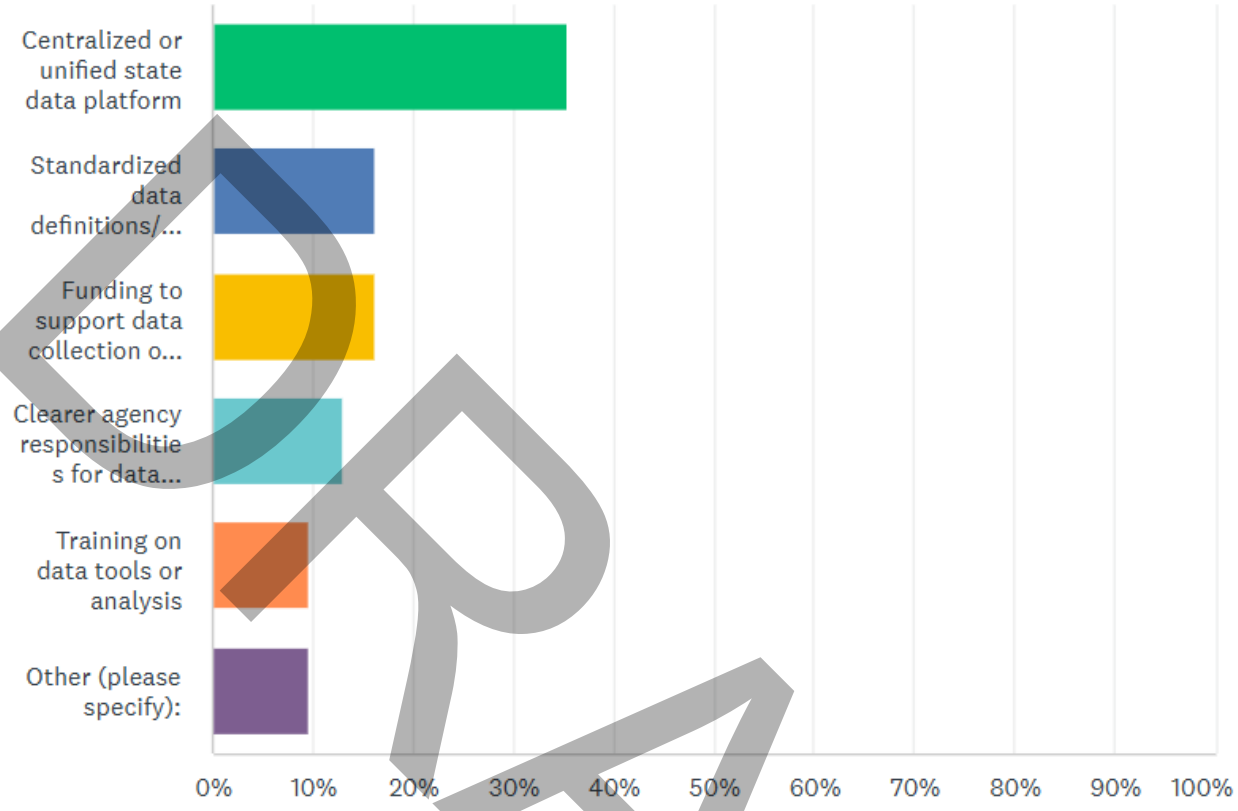
While state agencies collect portions of this information, such as permitting, production, and grid data, they do so independently, using different formats and schedules. As a result, the only consistent statewide datasets come from federal sources like the EIA's State Energy Data System (SEDS), which is updated annually and typically lags by 12 to 18 months.[7] This delay forces policymakers to make decisions using outdated information, even when more current state-level data already exist but are not shared or integrated.

While fragmented data makes effective planning difficult, it also weakens transparency and public confidence. A coordinated, state-managed data system would not only improve policymaking but also strengthen accountability and trust in climate programs. For example, the Sustainable Building Tax Credit (SBTC) provides no public breakdown of which credits are used most, how many applicants are low-income, or whether bonus credits drive additional energy savings. Similarly, the Energy Transition Act (ETA) lacks

disaggregated reporting on how transition funds are distributed or whether renewable energy investments are equitably deployed across communities. Additionally, OCD does not maintain a public complaint-tracking system, which leaves stakeholders to rely on public records requests for basic information.

One survey respondent noted the need for "tools that facilitate extraction of census-level data around household poverty, energy consumption, driving costs, etc., [which] can be very helpful for supporting policy decisions. DOE's LEAD tool was very useful, but has been taken down." When asked about critical data needs, 35% of survey respondents identified energy burden and affordability data as most important—ranking in the top 5 out of 15 categories of data types. Stakeholders agree that this problem can be solved through integration rather than duplication. 35% of survey respondents prioritized the creation of a centralized, state-owned data platform, and another 16% called for standardized definitions and formats to improve consistency across agencies (Figure 3).

Figure 3. Survey responses to: What would improve your organization's ability to use or share energy-related data?



While broad production and consumption statistics provide a starting point, New Mexico lacks the infrastructure and operational detail needed to turn those trends into actionable planning. Existing datasets offer little visibility into how the state's energy system physically operates—its transmission and distribution capacities, localized congestion points, or readiness to integrate new generation and storage. Without knowing where the grid is constrained, state agencies such as EMNRD, the Public Regulation Commission (PRC), and the Renewable Energy Transmission Authority (RETA) cannot plan effectively for new, clean energy integration, site new power or battery projects efficiently, or strengthen resilience to extreme weather. Critical grid information, such as line ratings, transformer loading, and substation locations, is not available in extractable form, limiting the ability to model power flows or identify where upgrades are most needed. EIA forms 860 and 923 track generation and storage assets and list utility-scale battery and pumped storage projects, but they do not consistently break out this data at the state level or by key operational characteristics such as storage duration or capacity factor. Similarly, no single system tracks interconnection queues for new generation or storage projects, making it difficult to assess backlogs or anticipate future constraints. As one stakeholder put it, "OCD permitting delays—currently 30+ days instead of 10–15—are partly due to outdated technology and insufficient data systems," with stakeholders pointing to the Texas digitized permitting system as a model.

These infrastructure data gaps also affect reliability and emergency response. Investor-owned utilities (IOUs) like PNM and El Paso Electric publish public outage maps, but these are customer tools, not platforms for operational coordination with state or local emergency managers. In practice, there are no state-level statutory or regulatory requirements for private energy providers to share real-time disruption or outage information with the public sector. As the Energy Security Plan notes, public agencies are often left to monitor conditions themselves or wait for companies to disclose problems, which can delay critical decisions. For example, the New Mexico State Emergency Operations Center (EOC) relies on utilities to report outage information during emergencies, using it to coordinate responses. Ideally, the operational outage data utilities track could also flow directly into the State EOC, reducing reliance on after-the-fact reporting and strengthening real-time situational awareness. Providers, for their part, have concerns about alarming customers prematurely, but this hesitancy reduces situational awareness at the state level and can slow actions such as opening cooling centers during extreme heat events.

The absence of authoritative GIS data on energy systems and service territories also constrains key agencies. EMNRD, the PRC, and Homeland Security and Emergency Management do not have a complete, consistent dataset to identify vulnerable communities or plan for cascading impacts. The Department of Information Technology's new Geospatial Information Officer (GIO) and the State of GIS in New Mexico initiative are working toward a unified geospatial infrastructure that could address these gaps. Integrating energy and utility datasets into this statewide spatial framework would strengthen situational awareness, emergency coordination, and resilience planning.[8]

Each of New Mexico's major energy technologies—oil and gas, geothermal, carbon capture and storage (CCS), renewables, and mining—depends on specialized datasets that are currently dispersed across multiple agencies and research institutions. These include subsurface geology, water use, emissions monitoring, and grid interconnection data. Because these datasets are siloed, the state lacks an integrated view of how technologies interact with one another or affect shared resources like water, land, pore space, and the grid. In the petroleum sector, comprehensive and accessible data on oil and gas production, produced water volumes and chemistry, and CO_2 injection and storage are essential for tracking emissions and managing the water–energy nexus. Similarly, consistent data on CO_2 capture, transport, and storage would improve oversight of carbon management projects and allow for more accurate greenhouse gas accounting.

Geothermal resources in the Rio Grande Rift represent another untapped opportunity: while public data from the Bureau of Geology and Mineral Resources and recent exploration wells exist, gaps in deep basin characterization, heat-demand mapping, and ground-source heat pump deployment limit their development potential. The state's Water Data Initiative offers a model for coordinating and sharing these types of datasets. Extending that approach across energy technologies would provide a comprehensive,

cross-sector view of New Mexico's resource base, supporting better regulatory alignment, investment planning, and progress toward decarbonization.

New Mexico lacks detailed insight into how energy is actually used across sectors. Federal datasets like the EIA's offer only high-level figures for residential, commercial, industrial, and transportation energy use, without the sub-sector detail needed for effective policy design. Industrial energy use, for example, is reported as a single category, masking major differences between mining, manufacturing, refining, and oil and gas operations—the very activities that dominate the state's energy and emissions profile. More granular information would help identify where electrification, efficiency upgrades, or geothermal direct use could deliver the greatest impact. Similar gaps exist in transportation data, where limited information on electric vehicle adoption, charging infrastructure, and transit trends prevents a full understanding of how mobility patterns are changing. Filling these sectoral data gaps is critical to designing targeted, cost-effective decarbonization strategies.

Energy use in New Mexico is not limited to electricity—heat is an equally important but largely invisible part of the picture. Most heat energy comes from the combustion of fuels such as natural gas, oil, biomass, or coal, which provide thermal energy for space heating, water heating, and industrial processes. Heat can also be produced as a byproduct of electricity generation (in combined heat and power, or cogeneration systems) or from non-combustion sources such as geothermal energy and, in the future, nuclear fission or fusion. Yet the U.S. EIA does not consistently differentiate heat energy use or losses as their own end-use category, particularly for non-electric thermal energy. While federal datasets report energy use by sector and fuel, they do not isolate specific functions such as space heating, water heating, industrial process heat or loss heat in a consistent way. As a result, New Mexico lacks a clear understanding of how much total heat is used or lost (and from which sources), whether electricity, natural gas, oil, biomass, or geothermal.

Even where heating data exist, such as the Residential and Commercial Building Consumption Surveys, they are national or regional in scope, released only every few years, and lag behind current conditions. For industry, the Manufacturing Energy Consumption Survey provides some information on process heating, but it is also national, not state-specific, and published infrequently. Moreover, there is no comprehensive tracking of heat pump adoption, geothermal direct-use projects, or district heating systems, leaving key pathways for decarbonizing buildings and industry effectively unmeasured. Stakeholders note that some of this information exists within state agencies but is not systematically shared or accessible. Without mechanisms for data exchange, New Mexico cannot fully evaluate opportunities to cut emissions, lower costs, or improve energy resilience through heating system transitions. Improved data on heat generation and loss across sectors could also identify opportunities for heat recovery, fuel-switching, and efficiency initiatives that deliver economic and climate benefits.

Potential Solutions

The Legislature could authorize and fund the development of a state-level DETECT digital platform to integrate energy and emissions data. DETECT would serve as New Mexico's state-level analogue to the U.S. EIA, providing an integrated, authoritative source for energy, emissions, and resource data to support coordinated policy, regulatory, and investment decisions. Stakeholders emphasized the value of a unified data platform that consolidates information on energy supply, costs, consumption by sector, imports and exports, and associated greenhouse gas (GHG) emissions. The platform—conceptualized as a database of databases—would integrate datasets from multiple agencies into an interoperable system to support planning, modeling, and scenario analysis. The system could disaggregate data by sub-sector (e.g., transportation modes, building end uses, industrial processes) and by equity factors (e.g., Tribal Nations, low-income, and rural communities) to make just transition impacts visible and support targeted interventions. For example, disaggregating Sustainable Building Tax Credit data by income and bonus credit uptake would show whether incentives reach low-income households. The platform could also ensure that communities, industries, and policymakers have clear, accessible information about data sources, methodologies, and the rationale behind climate policies, enabling transparent, data-driven decision-making.

New Mexico has taken a similar approach in other sectors: in education, the state replaced its outdated STARS reporting tool with *Project Nova*, a centralized data system that reduced manual reporting, improved data accuracy, and provided legislators with faster access to reliable information.[9] Another example is New Mexico's Water Data Initiative. Established under the Water Data Act and led by the New Mexico Bureau of Geology and Mineral Resources in partnership with EMNRD, NMED, and the Office of the State Engineer, the initiative modernizes how the state collects, integrates, and shares water data. Its public platform brings together datasets on water quality, quantity, use, and related sectors.[10] Building on that model, an energy and emissions digital platform would allow policymakers, regulators, and the public to access accurate, transparent data in one place, enabling faster decision-making, stronger coordination across agencies, and greater accountability for progress on the state's energy goals.

The Legislature could establish standardized data-sharing requirements for investor-owned utilities and cooperatives. Current public dashboards from IOUs provide useful customer information but lack the detail needed for statewide planning and emergency coordination. States like California, with support from the California Public Utilities Commission (CPUC), have asked utilities to develop Distributed Resource Planning Portals and other resources that provide detailed information and data. The Legislature could direct EMNRD and the PRC to require utilities to regularly submit machine-readable data on generation, demand, reliability, and interconnection status. Several utilities already offer real-time outage feeds, and the U.S. Department of Energy's EAGLE-I platform aggregates some outage information, but accuracy and coverage vary. Existing coordination tools include New Mexico's Emergency Support Function structure, which

guides agency actions during disasters, and EMNRD's monthly energy sector meetings, which share updates among state, federal, and utility partners. However, these processes are ad hoc and require agencies to request updates directly from utilities. A clear statutory framework would standardize reporting and automate data sharing, enabling faster response, stronger grid resilience, and more transparent oversight.

The Governor could issue an Executive Order establishing an interagency data working group to standardize and integrate datasets across key state agencies, including NMED, EMNRD/OCD, PRC, DOT, DWS, NMED, and SLO. The order could direct the group to align data structures, reporting practices, and quality standards to create interoperable systems that enhance coordination on permitting, compliance, and planning. Where mandatory targets are not feasible, the order could authorize the use of voluntary goals paired with financial and regulatory incentives such as streamlined permitting, improved agency staffing, and leveraging complementary programs like RETA to encourage participation and progress toward shared objectives. Data improvements and collaboration could be coordinated with the Department of Information Technology's Geospatial Information Officer (GIO) and the State of GIS in New Mexico initiative, which is developing a unified statewide geospatial infrastructure. Partnering with the GIO would ensure that energy and utility data are incorporated into this broader spatial data framework, improving consistency, accessibility, and real-time coordination across state and local agencies.

A fragmented greenhouse gas reporting system limits New Mexico's ability to track progress and design effective climate policy.

While New Mexico Environmental Department has begun updating its GHG monitoring, the current inventory is built around air quality reporting rather than a dedicated greenhouse gas reporting and tracking system. As a result, emissions data are infrequent, aggregated, and not detailed enough to track trends, support rapid response, or guide policy. Stakeholder interviews and survey results reflect these gaps. Only 32% of survey respondents reported having sufficient access to data needed for energy- or climate-related decision-making, with 68% citing missing or difficult-to-obtain data as a significant barrier. For example, many state agencies have adopted their own climate or decarbonization goals, but without consistent data, they struggle to track progress or align their planning with statewide targets.

New Mexico's methane reporting system at the New Mexico Oil Conservation Division has driven some improvements but remains unreliable and difficult to use; it can be strengthened through centralized reporting and verification. Compliance currently relies on self-reported data from operators, many of whom have overstated capture rates. As one stakeholder put it, "repeat violators are still allowed to operate with minimal consequences… many companies treat fines as the cost of doing business rather than a deterrent." In 2022, 62 percent of operators claimed 100 percent or greater gas capture, and many failed to file on time.[11] While regulators testified that 88 percent of operators met

the 98 percent capture requirement in 2024, anomalies remain—for example, in early 2024, one midstream company reported venting more natural gas than all other producers in the state combined.[12] Regulators also flagged that the same operator exceeded its permitted VOC limits 163 times in just two months, accounting for nearly 40 percent of all excess emissions reports in the state.[13] Short-term fluctuations also raise concerns: from November to December 2022, reported flaring rose 39 percent and venting spiked 161 percent.[14] After OCD's 2020 ban on routine venting, operators shifted to flaring excess gas. This reduced methane emissions but increased CO_2 from combustion. State analysis provided to the New Mexico CETS team shows that overall emissions intensity (CO_2 per barrel or per well) has declined, indicating efficiency gains. However, flaring volumes still vary significantly by operator.

Companies must also report separately to multiple agencies, including OCD, NMED, and EMNRD. Overlapping jurisdiction adds further complication, as OCD regulates methane under the Methane Waste Rule, while NMED regulates it through air quality criteria and ozone rules. This duplication creates inefficiencies and can result in conflicting datasets. Several stakeholders recommended that NMED and EMNRD establish a centralized compliance tracker for the Methane and Ozone Precursor Rules. This would reduce duplication, reconcile overlapping jurisdictions, and improve transparency. Earlier proposals from the state's Priority Climate Action Plan envisioned such a system, but implementation remains unclear. At present, state agencies—primarily NMED under the Air Quality Control Act and the Clean Future Act—have limited authority to require GHG reporting across all sectors. Existing rules focus mainly on large stationary sources and omit smaller emitters and indirect emissions.

These data challenges stem in part from the absence of a modern, statewide GHG reporting framework. Past legislative efforts to establish such a system have failed. Senate Bill 4 (2025), which proposed binding reduction targets and equity provisions, died in committee over concerns about costs, economic impacts, and agency capacity. Earlier rules from 2010 applied only to major emitters, required no reductions, and offered few tools for meeting current climate goals. Without a comprehensive reporting framework, New Mexico's monitoring remains fragmented and insufficient for statewide oversight. Other states show what a more comprehensive system could look like. California's climate program, for instance, requires annual GHG reporting by major sources under its Global Warming Solutions Act,[15] with industrial facilities, fuel suppliers, and electricity importers all reporting detailed emissions to a central database. Massachusetts likewise mandates facility-level GHG reporting under its climate laws, yielding data that guide the state's emission reduction plans.[16] These programs, often paired with third-party verification and public transparency, demonstrate how a unified reporting framework can give decision-makers reliable, actionable emissions data.

Potential Solutions

The Legislature could direct NMED, EMNRD, and OCD to evaluate and adopt consistent methodologies for comprehensive carbon accounting—measuring greenhouse gas (GHG) emissions across all sectors and stages of production, use, and disposal. Establishing a unified framework would harmonize data structures, improve accuracy, and ensure that emissions are reported consistently across agencies. The EFI Foundation has developed a framework for a comprehensive carbon accounting system that would enable product- and entity-level tracking, which could serve as a model for New Mexico.[17] Legislative or regulatory action may be needed to expand reporting requirements and authorize the use of modern measurement technologies such as automated sensors, satellite monitoring, and digital reporting tools. Over time, the state could transition from compliance-based inventories to an integrated, near-real-time data system that supports transparent tracking and informed policymaking.

The Legislature could amend 20.2.87 NMAC or direct NMED through rulemaking to remove or modify the restriction that greenhouse gas (GHG) reports be submitted "not more often than annually." Replacing this clause with language such as "on a schedule established by the department" would allow more flexible reporting frequencies—quarterly, monthly, or continuous—based on source size, emissions levels, or available monitoring technology. This approach aligns with emerging best practices in states like California, where annual reporting is supplemented by sector-specific monitoring requirements, and with evolving digital measurement, reporting, and verification (MRV) standards that support near-real-time data collection. Updating the rule in this way would enable NMED to require more frequent or automated submissions, integrate continuous data from sensors or satellite systems, and share information seamlessly with EMNRD and OCD. Such revisions would modernize New Mexico's reporting framework and move the state toward a dynamic, technology-enabled system for accurate and transparent emissions tracking.

Summary of Potential Solutions

Key
Solution may be pursued through:
Legislative Action
Administrative/Regulatory Action

Table 1. Feasible and Impactful Solutions

Gap	Feasible and Impactful Solutions
 Building an integrated, state-managed energy data system is essential for New Mexico to understand and manage how energy is produced, delivered, and used across its economy.	**The Legislature could authorize and fund the development of a state-level DETECT digital platform to integrate energy and emissions data.** DETECT would serve as New Mexico's state-level analogue to the U.S. EIA, providing an integrated, authoritative source for energy, emissions, and resource data to support coordinated policy, regulatory, and investment decisions. Stakeholders emphasized the value of a unified data platform that consolidates information on energy supply, costs, consumption by sector, imports and exports, and associated greenhouse gas (GHG) emissions. The platform—conceptualized as a database of databases—would integrate datasets from multiple agencies into an interoperable system to support planning, modeling, and scenario analysis. The system could disaggregate data by sub-sector (e.g., transportation modes, building end uses, industrial processes) and by equity factors (e.g., Tribal Nations, low-income, and rural communities) to make just transition impacts visible and support targeted interventions. For example, disaggregating Sustainable Building Tax Credit data by income and bonus credit uptake would show whether incentives reach low-income households. The platform could also ensure that communities, industries, and policymakers have clear, accessible information about data sources, methodologies, and the rationale behind climate policies, enabling transparent, data-driven decision-making. New Mexico has taken a similar approach in other sectors: in education, the state replaced its outdated STARS reporting tool with *Project Nova*, a centralized data system that reduced manual reporting, improved data accuracy, and provided legislators with faster access to reliable information.[18] Another example is New Mexico's Water Data Initiative. Established under the Water Data Act and led by the New Mexico Bureau of Geology and Mineral Resources in partnership with EMNRD, NMED, and the Office of the State Engineer, the initiative modernizes how the state collects, integrates, and shares water data. Its public platform brings together datasets on water quality, quantity, use, and related sectors.[19] Building on that model, an energy and emissions digital platform would allow policymakers, regulators, and the public to access accurate, transparent data in one place, enabling faster decision-making, stronger coordination across agencies, and greater accountability for progress on the state's energy goals.
	Legislature could establish standardized data-sharing requirements for investor-owned utilities and cooperatives. Current public dashboards from IOUs provide useful customer information but lack the detail needed for statewide planning and emergency coordination. States like California, with support from the California Public Utilities Commission (CPUC), have asked utilities to develop Distributed Resource Planning Portals and other resources that provide detailed information and data. The Legislature could direct EMNRD and the PRC to require utilities to regularly submit machine-readable data on generation, demand, reliability, and interconnection status. Several utilities already offer real-time outage feeds, and the U.S. Department of Energy's EAGLE-I platform aggregates some outage information, but accuracy and coverage vary. Existing coordination tools include New Mexico's Emergency Support Function (ESF) structure, which guides agency actions during disasters, and EMNRD's monthly energy sector meetings, which share updates among state, federal, and utility partners. However, these processes are ad hoc and require agencies to request updates directly from utilities. A clear statutory framework would standardize reporting and automate data sharing, enabling faster response, stronger grid resilience, and more transparent oversight.
	The Governor could issue an Executive Order establishing an interagency data working group to standardize and integrate datasets across key state agencies, including NMED, EMNRD/OCD, PRC, DOT, DWS, NMEDD and SLO. The order could direct the group to align data structures, reporting practices, and quality standards to create interoperable systems that enhance coordination on permitting, compliance,

	and planning. Where mandatory targets are not feasible, the order could authorize the use of voluntary goals paired with financial and regulatory incentives such as streamlined permitting, improved agency staffing, and leveraging complementary programs like RETA to encourage participation and progress toward shared objectives. Data improvements and collaboration could be coordinated with the Department of Information Technology's Geospatial Information Officer (GIO) and the State of GIS in New Mexico initiative, which is developing a unified statewide geospatial infrastructure. Partnering with the GIO would ensure that energy and utility data are incorporated into this broader spatial data framework, improving consistency, accessibility, and real-time coordination across state and local agencies.
 A fragmented greenhouse gas reporting system limits New Mexico's ability to track progress and design effective climate policy.	**The Legislature could direct NMED, EMNRD, and OCD to evaluate and adopt consistent methodologies for comprehensive carbon accounting—measuring greenhouse gas (GHG) emissions across all sectors and stages of production, use, and disposal.** Establishing a unified framework would harmonize data structures, improve accuracy, and ensure that emissions are reported consistently across agencies. The EFI Foundation has developed a framework for a comprehensive carbon accounting system that would enable product- and entity-level tracking, which could serve as a model for New Mexico. Legislative or regulatory action may be needed to expand reporting requirements and authorize the use of modern measurement technologies such as automated sensors, satellite monitoring, and digital reporting tools. Over time, the state could transition from compliance-based inventories to an integrated, near-real-time data system that supports transparent tracking and informed policymaking.
	The Legislature could amend 20.2.87 NMAC or direct NMED through rulemaking to remove or modify the restriction that greenhouse gas (GHG) reports be submitted "not more often than annually." Replacing this clause with language such as "on a schedule established by the department" would allow more flexible reporting frequencies—quarterly, monthly, or continuous—based on source size, emissions levels, or available monitoring technology. This approach aligns with emerging best practices in states like California, where annual reporting is supplemented by sector-specific monitoring requirements, and with evolving digital measurement, reporting, and verification (MRV) standards that support near-real-time data collection. Updating the rule in this way would enable NMED to require more frequent or automated submissions, integrate continuous data from sensors or satellite systems, and share information seamlessly with EMNRD and OCD. Such revisions would modernize New Mexico's reporting framework and move the state toward a dynamic, technology-enabled system for accurate and transparent emissions tracking.

Stakeholder Overview

The following table and list highlight examples of legislative champions (lawmakers who have sponsored or supported policies relevant to data goals) and other stakeholders whose roles, expertise, or influence intersect with data issues in New Mexico.

Table 1. Potential Legislative Champions

Role	Name	District	Justification
Senator	Mimi Stewart	17	Strong advocate for the Energy Transition Act, has sponsored or supported climate and energy legislation; engaged in statewide renewable energy and reporting frameworks.
Senator	Mark Moores	21	Engaged in energy and environmental legislation; supportive of clean energy deployment and technology modernization.
Senator	Elizabeth "Liz" Stefanics	39	Involved in environmental oversight and energy legislation, supportive of statewide reporting and transparency initiatives.
Rep	Gail Chasey	18	Member of House Appropriations & Finance; has sponsored legislation addressing state-level environmental data management and reporting systems.
Rep	Jason Harper	6	Advocates for transparency in energy and environmental data; involved in committee discussions on emissions and utility oversight.
Rep	Kristina Ortez	42	Focused on just transition and rural economic development; has participated in legislative discussions on clean energy deployment and transparency in reporting.

Preliminary List of Key Stakeholders

- **State Agencies:** PRC, OCD, NMED, EMNRD, IAD, DWS, SIC, SLO
- **Investor-Owned Utilities:** Public Service Company of New Mexico (PNM), other IOUs (EPE, SPS, etc.)
- **Electric Cooperatives:** New Mexico Rural Electric Cooperative Association (RECA), Kit Carson Electric Cooperative, other member co-ops
- **Tribal Governments and Organizations:** Navajo Nation Council, All Pueblo Council of Governors, Eight Northern Indian Pueblos Council, Individual Pueblo governments.
- **Labor / Workforce Organizations**: IBEW, Building Trades Councils
- **Research and Technical Institutions:** NMSU, UNM, NMT, Los Alamos National Lab, Sandia National Lab

References

[1] New Mexico Environment Department. *Greenhouse Gas Emissions Inventories*. Accessed October 6, 2025. https://www.env.nm.gov/climate-change-bureau/greenhouse-gas-emissions-inventories/

[2] Bridger Photonics. "Gas Mapping LiDAR Gains Regulatory Approval for ALARM Use in New Mexico." March 16, 2022. https://info.bridgerphotonics.com/blog/gas-mapping-lidar-gains-regulatory-approval-alarm-use-new-mexico

[3] New Mexico Interagency Climate Change Task Force. *New Mexico Climate Strategy: Initial Recommendations and Status Update*. Santa Fe, NM: Climate Change Bureau, 2019. Accessed October 6, 2025. https://www.climateaction.nm.gov/wp-content/uploads/2024/09/NMClimateChange_2019-condensed.pdf

[4] Energy and Environmental Economics, Inc. *New Mexico Greenhouse Gas Emissions Inventory and Forecast: 2021 Emissions Inventory and 2030–2050 Forecast*. Prepared for the Center for New Energy Economy at Colorado State University, December 2024. Accessed October 6, 2025. https://cloud.env.nm.gov/resources/_translator.php/OGMyZmMwODI4ODEzZDJmNzU1Njk4NmQyNl8xNzcyMTM~.pdf

[5] Cornell Law School. "N.M. Admin. Code tit. 20, ch. 2, pt. 300 - Reporting of Greenhouse Gas Emissions [Repealed]." Legal Information Institute. Accessed October 6, 2025. https://www.law.cornell.edu/regulations/new-mexico/N-M-Admin-Code-tit-20-ch-2-pt-300#:~:text=HISTORY%20OF%2020,Environmental%20Improvement%20Board%2C%20effective%203%2F14%2F2012

[6] Legal Information Institute. "N.M. Admin. Code tit. 20, ch. 2, pt. 300 - Reporting of Greenhouse Gas Emissions [Repealed]." *Cornell Law School*, accessed October 6, 2025. https://www.law.cornell.edu/regulations/new-mexico/N-M-Admin-Code-tit-20-ch-2-pt-300#:~:text=HISTORY%20OF%2020,Environmental%20Improvement%20Board%2C%20effective%203%2F14%2F2012

[7] U.S. Energy Information Administration. "State Energy Data System (SEDS): Complete Data Files." Accessed October 6, 2025. https://www.eia.gov/state/seds/seds-data-complete.php

[8] Runyan, Natalie. *State of GIS in New Mexico: Geospatial Information Officer (GIO) Report, May 2, 2025*. NMGIC. May 2, 2025. https://nmgic.com/wp-content/uploads/2025/05/01_NMGIC_GIOReport.pdf.

[9] New Mexico Public Education Department. *STARS Redesign: Introducing Nova*. Presentation to the New Mexico Legislative Education Study Committee, June 28, 2023.

[10] New Mexico Water Data. "Home." https://newmexicowaterdata.org/.

[11] Source NM. "Many Worry That Companies Are Flouting New Mexico's Landmark Gas Flaring Rules." March 17, 2023. https://sourcenm.com/2023/03/17/many-worry-that-companies-are-flouting-new-mexicos-landmark-gas-flaring-rules/

[12] Prospect. "New Mexico Loophole May Allow Record Methane Releases." May 16, 2024. https://prospect.org/environment/2024-05-16-new-mexico-loophole-may-allow-record-methane-releases/

[13] Anonymous. Interview by EFI Foundation. July, 2025.

[14] Martha Pskowski. "Many Worry That Companies Are Flouting New Mexico's Landmark Gas Flaring Rules." *Source New Mexico*, March 17, 2023. https://sourcenm.com/2023/03/17/many-worry-that-companies-are-flouting-new-mexicos-landmark-gas-flaring-rules/

[15] California Air Resources Board. "Mandatory Greenhouse Gas Emissions Reporting Program." Accessed October 6, 2025. https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/about

[16] Massachusetts Department of Environmental Protection. "MassDEP Greenhouse Gas Emissions Reporting Program." Accessed October 6, 2025. https://www.mass.gov/guides/massdep-greenhouse-gas-emissions-reporting-program#:~:text=The%20Massachusetts%20Global%20Warming%20Solutions,GHG%29%20reporting%20regulations

[17] EFI Foundation. *Carbon Accounting: Framework for a Comprehensive New Product- and Entity-Level, Ledger-Based Carbon Accounting System*. June 2025. https://efifoundation.org/wp-content/uploads/sites/3/2025/06/EFI-Foundation-Carbon-Accounting-Framework-for-a-Comprehensive-New-Product-and-Entity-Level-Ledger-Based-Carbon-Accounting-System.pdf.

[18] New Mexico Public Education Department. *STARS Redesign: Introducing Nova*. Presentation to the New Mexico Legislative Education Study Committee, June 28, 2023.
[19] New Mexico Water Data. "Home." https://newmexicowaterdata.org/.