



WE ARE TRANSFORMING THE ENERGY LANDSCAPE

May 30, 2025

NMED-OSHB

Attn: Heat Illness and Injury Prevention
P.O. Box 5469
Santa Fe, NM, 87502

**RE: New Mexico Environment Department (NMED)
Proposed Heat Illness and Injury Prevention Rule
Public Comment**

El Paso Electric (EPE) is a public utility that generates, transmits and distributes electricity across a 10,000 square mile service territory in the Rio Grande Valley of west Texas and south central New Mexico. At EPE, we remain committed to protecting the safety and health of our nearly 1,200 employee workforce. Although EPE recognizes the importance of having measures in place to protect workers against heat illness, NMED's proposed rule for Heat Illness and Injury Prevention establishes a heat index threshold, at 80 degrees F, that is not adequate for the desert climate experienced by the state. According to the proposed rule, reaching the 80 degree F heat index threshold would trigger control measures that may not be necessary in a state where most employees are exposed to temperatures above 80 degrees F for multiple months of the year, and as such, are acclimatized to working in those conditions.

EPE has worked diligently to develop and implement measures that prevent heat illness incidents specifically tailored to the region we serve. Such measures include e-mail communications triggered at temperatures above 91 degrees F, daily tailgating outlining measures to recognize and prevent heat illness, encouraging hydration, frequent breaks, and when possible, scheduling high risk work in the cooler time of the day.

EPE appreciates the opportunity to file comments regarding NMED's Proposed Heat Illness and Injury Prevention Rule and the consideration of the comments listed above. If you have any questions, please let me know at (915) 521-4649 or via e-mail at teresa.sosa@epelectric.com.

Sincerely

A handwritten signature in black ink, appearing to read "Teresa Sosa".

Teresa Sosa
Director, Environmental and Safety

epelectric.com

