August 17, 2010

Mr. Russell G. Golden
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

File Reference: 1840-100
Re: Proposed Accounting Standards Update, Contingencies (Topic 450) — Disclosure of Certain Loss Contingencies

Dear Mr. Golden:

PNM Resources, Inc. appreciates the opportunity to respond to the FASB’s Exposure Draft (“ED”) on Disclosure of Certain Loss Contingencies. We note that many of the responses to the ED posted to date encourage the Board to extend the comment period and our understanding is that on August 18 the Board will consider extending that period.

In addition to reasons to extend the comment period pointed out by others, we would emphasize that the ED was issued on July 20, 2010, when the vast majority of public companies were in the middle of their 10-Q process for the quarter ended June 30, 2010. In addition, many public companies were either dealing with XBRL or with detail tagging for the first time.

Due to the above and the reasons outlined by others, we do not believe the 30 day comment period was sufficient. Accordingly, we encourage the Board to extend the comment period for at least an additional 30 days to allow the ED to be carefully analyzed and allow those responding the opportunity to appropriately review the proposed disclosure requirements and submit comments that provide the most meaningful information to the Board.

Very truly yours,

PNM Resources, Inc.

[Signature]

Thomas G. Sategna
Vice President and Corporate Controller