



# Empire Electric Association, Inc.

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Submitted electronically

May 03, 2022

Mr. Doug Dean, Director  
Colorado Public Utility Commission  
1560 Broadway, 2nd Floor, Suite 250  
Denver, CO 80202

**Subject: 2021 Renewable Energy Standard (RES) / Docket No. 22M-0014E**

Mr. Dean:

In compliance with the passage of the Colorado Renewable Energy Standard (RES), this letter serves as Empire Electric Association's (EEA's) report of meeting its 2021 RES requirement as outlined in Rule 3662.

Based on our 2021 retail sales, EEA's compliance obligation of 10% of our energy requirements, plus the additional required distributed generation components is shown in the table below. As indicated, our system had resources on-line that were used to meet the requirement. When necessary, our power supplier, Tri-State Generation and Transmission, Inc. (Tri-State), retired renewable energy credits (RECs) on our behalf from their Colorado RES eligible resources, which includes the multipliers for selected fuels and technologies.

**Table 1.1**

RES Component	Component Requirement (MWHs)	Cooperative's Resources Used (RECs)	Additional Tri-State Resources Used (RECs)
Total RES Requirement <sup>1</sup>	50,170	5,569	44,601
Retail Dist. Generation	734	734	0
Wholesale Dist. Generation	4,283	4,283	0

Attached is a letter from Tri-State attesting to the permanent retirement of these RECs on EEA's behalf. If you have any questions regarding this matter, please contact us.

Sincerely,

Josh Dellinger  
General Manager, Empire Electric Association

Attachments

<sup>1</sup> Total RES Requirement is inclusive of Retail and Wholesale distributed generation requirements and associated resources include the resources used towards the same distributed generation requirement.



**TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.**

HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

April 27<sup>th</sup>, 2022

Mr. Josh Dellinger  
Empire Electric Association, Inc.  
PO Box K  
Cortez, CO 81321

**Subject: 2021 Renewable Energy Standard (RES) / Docket No. 22M-0014E**

Dear Mr. Dellinger,

Tri-State, as your power supplier, is attesting with this letter and the enclosed documentation that we will retire enough renewable energy credits (RECs) to meet your Colorado Renewable Energy Standard (RES) requirements for 2021.

Tri-State and its Member Systems are jointly affected by the RES in Colorado. Tri-State has compliance obligations as a Qualifying Wholesale Utility and its Member Systems have compliance obligations as Qualifying Retail Utilities. For Member Systems who are unable to meet their own RES requirements, Tri-State has renewable energy credits to meet the requirements on behalf of their Member Systems. Colorado RES rules require qualifying utilities to report on compliance by June 1<sup>st</sup>, 2022, for the prior compliance year (Rule 3662(a)).

In 2021, your compliance obligation is equal to 10% of your energy requirements and includes a distributed generation (DG) component. The DG requirement is one-tenth (10%) of the total 10% requirement or 1% of total retail sales and a portion of that needs to come from retail DG. The retail DG component is calculated based on your total sales less large industrial sales, multiplied by one-half of 1%. Table 1.1 below summarizes your cooperative’s obligations, the amount of your system resources being used for the specified portion of the obligation, and the amount of any necessary eligible resources that Tri-State will retire on your behalf, including multipliers for all selected fuels and technologies. A full summary can be found in the attached RES compliance worksheets.

**Table 1.1**

RES Component	Component Requirement (MWHs)	Cooperative’s Resources Used (RECs)	Additional Tri-State Resources Used (RECs)
Total RES Requirement <sup>1</sup>	50,170	5,569	44,601
Retail Distributed Generation	734	734	0
Wholesale Distributed Generation	4,283	4,283	0

It is your responsibility and requirement to file this letter and attachment with the Colorado Public Utilities Commission to demonstrate your cooperative’s compliance with the 2021 RES requirement.

Sincerely,

*Duane Highley*  
Duane Highley (Apr 29, 2022 09:46 MDT)

Duane D. Highley  
Chief Executive Officer

Enclosures

<sup>1</sup> Total RES Requirement is inclusive of Retail and Wholesale distributed generation requirements and associated resources include the resources used towards the same distributed generation requirement.

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2021 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

<u>Line No.</u>	<u>Colorado Members</u>	<b>2021 Form 7 Colorado Total Retail Electric Sales</b>	<b>2021 Colorado RES Requirement at 10% Percent</b>	<b>Member Self- Generated Renewable Supplies Before Multiplier<sup>1</sup></b>	<b>Less: Member Self- Generated Renewable Supplies With Multiplier<sup>1</sup></b>	<b>Net 2021 (Rounded) Colorado RES Requirement</b>
	<i>(a)</i>	<i>(MWh)</i> <i>(b)</i>	<i>(MWh)</i> <i>(c)</i>	<i>(MWh)</i> <i>(d)</i>	<i>(RECs)</i> <i>(e)</i>	<i>(MWh)</i> <i>(f)</i>
1	Empire Electric Association, Inc.	501,692	50,170	3,416	5,569	44,601
2	Gunnison County Electric Association, Inc.	123,909	12,391	14	35	12,356
3	High West Energy	111,332	11,134	-	-	11,134
4	Highline Electric Association	347,103	34,711	10,969	12,907	21,804
5	K.C. Electric Association	222,430	22,243	-	-	22,243
6	La Plata Electric Association, Inc.	898,579	89,858	55,041	78,402	11,456
7	Morgan County Rural Electric Association	379,745	37,975	145	343	37,632
8	Mountain Parks Electric, Inc.	314,453	31,446	9,128	9,128	22,318
9	Mountain View Electric Association, Inc.	927,441	92,745	-	-	92,745
10	Poudre Valley Rural Electric Association, Inc.	1,360,556	136,056	48,695	60,662	75,394
11	San Isabel Electric Association, Inc.	430,652	43,066	14,656	27,070	15,996
12	San Luis Valley Rural Electric Cooperative, Inc.	221,193	22,120	7,243	7,927	14,193
13	San Miguel Power Association, Inc.	208,259	20,826	1,364	3,864	16,962
14	Sangre De Cristo Electric Association, Inc.	125,738	12,574	6,076	9,292	3,282
15	Southeast Colorado Power Association	240,197	24,020	6,562	6,796	17,224
16	United Power, Inc.	2,902,460	580,492	174,385	202,297	378,195
17	White River Electric Association, Inc.	602,760	60,276	4,971	5,103	55,173
18	Y-W Electric Association, Inc.	372,648	37,265	-	-	37,265
19	<b>Total Colorado</b>	<b>10,291,145</b>	<b>1,319,368</b>	<b>342,666</b>	<b>429,394</b>	<b>889,973</b>

<b>Tri-State Renewable Retirements (CO RES)</b>	<b>Additional Resources Used for 2021 Retirements (MWh)</b>	<b>Resource Multiplier</b>	<b>Additional Resources Used for 2021 Retirements w/ Multiplier (RECs)</b>	<b>Percent of Total Remaining Requirement</b>	<b>Resource Vintage</b>
20	Additional Retail DG RECs	11,126	various	11,598	1.30% 2017/2021
21	Additional Wholesale DG RECS	10,360	various	10,360	1.16% 2021
22	WAPA Small Hydro, < 30MW - CRSP, CO	24,383	1.25	30,479	3.42% 2016
23	WAPA Small Hydro, < 30MW - LAP, CO	522,720	1.25	653,400	73.42% 2016
24	WAPA Small Hydro, < 30MW - LAP, CO	147,309	1.25	184,136	20.69% 2017
25	<b>Total</b>	<b>715,897</b>		<b>889,973</b>	<b>100.00%</b>

*Important Notes:*

1) Resources include supplies from 2017 and 2021 for members, if available, and are also inclusive of member generated DG requirement supplies

2) Member Retail DG summary can be viewed on pages 2 and 3 and the Wholesale DG summary is included on pages 4 and 5

3) This data represents the renewable portfolio obligations by Tri-State Generation and Transmission Association's Members serving Colorado and the resources utilized to meet those obligations. Tri-State will permanently retire these renewable credits to meet the obligations.

Tri-State may have other available resources that are not required for this year's reporting.

4) Retail Sales figures are obtained through Form 7 or member communication, and are exclusive of sale for resale or non-Colorado sales. Some sales figures may be pre-audited numbers due to timing of material. If there are any changes in sales data, a revised compliance report will be issued.

5) Remaining 2021 Requirement is rounded to nearest whole number

6) United Power is subject to 20% under CO RES standards due to total meters greater than 100,000.

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2021 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

2021 Retail DG Requirement Calculation							
(a)	(b)	(c)	(d)	(e)	(f)	(g)	
Line No.	Colorado Members	2021 Form 7 Total Colorado Electric Sales (MWh)	2021 Form 7 Total Industrial Electric Sales (MWh) <sup>1</sup>	2021 Retail Electric Sales (MWh)	2021 Form 7 Total Meters	2021 Retail DG Requirement (%)	2021 Retail DG Requirement (MWh)
1	Empire Electric Association, Inc.	501,692	354,838	146,854	16,651	0.500%	734
2	Gunnison County Electric Association, Inc.	123,909	7,347	116,562	11,353	0.500%	583
3	High West Energy	111,332	37,646	73,686	2,175	0.375%	276
4	Highline Electric Association	347,103	55,047	292,056	8,597	0.375%	1,095
5	K.C. Electric Association	222,430	-	222,430	6,616	0.375%	834
6	La Plata Electric Association, Inc.	898,579	326,969	571,610	45,482	0.500%	2,858
7	Morgan County Rural Electric Association	379,745	70,059	309,686	9,089	0.375%	1,161
8	Mountain Parks Electric, Inc.	314,453	27,549	286,904	21,623	0.500%	1,435
9	Mountain View Electric Association, Inc.	927,441	66,984	860,457	59,406	0.500%	4,302
10	Poudre Valley Rural Electric Association, Inc.	1,360,556	503,167	857,389	49,040	0.500%	4,287
11	San Isabel Electric Association, Inc.	430,652	157,729	272,923	25,434	0.500%	1,365
12	San Luis Valley Rural Electric Cooperative, Inc.	221,193	2,561	218,632	12,980	0.500%	1,093
13	San Miguel Power Association, Inc.	208,259	-	208,259	14,221	0.500%	1,041
14	Sangre De Cristo Electric Association, Inc.	125,738	5,622	120,116	13,539	0.500%	601
15	Southeast Colorado Power Association	240,197	39,459	200,738	10,702	0.500%	1,004
16	United Power, Inc.	2,902,460	1,356,390	1,546,070	102,305	0.500%	7,730
17	White River Electric Association, Inc.	602,760	549,322	53,438	3,444	0.375%	200
18	Y-W Electric Association, Inc.	372,648	67,926	304,722	8,848	0.375%	1,143
19	<b>Total Colorado</b>	<b>10,291,145</b>	<b>3,628,616</b>	<b>6,662,530</b>			<b>31,743</b>

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2021 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

2021 Retail DG Retirement Summary					
(a)	(b)	(c)	(d)	(f)	
Line No.	2021 Retail DG Requirement (MWh)	Member Retail DG Supply W/out Multiplier (MWh) <sup>2</sup>	Member Retail DG Supply Including Multiplier (RECs)	Net 2021 Retail DG Requirement Remaining (RECs) <sup>3</sup>	
<b>Colorado Members</b>					
1	Empire Electric Association, Inc.	734	265	734	-
2	Gunnison County Electric Association, Inc.	583	14	35	547
3	High West Energy	276	-	-	276
4	Highline Electric Association	1,095	171	277	819
5	K.C. Electric Association	834	-	-	834
6	La Plata Electric Association, Inc.	2,858	1,207	2,858	-
7	Morgan County Rural Electric Association	1,161	145	343	818
8	Mountain Parks Electric, Inc.	1,435	-	-	1,435
9	Mountain View Electric Association, Inc.	4,302	-	-	4,302
10	Poudre Valley Rural Electric Association, Inc.	4,287	1,959	4,287	-
11	San Isabel Electric Association, Inc.	1,365	1,365	1,365	-
12	San Luis Valley Rural Electric Cooperative, Inc.	1,093	-	-	1,093
13	San Miguel Power Association, Inc.	1,041	347	1,041	-
14	Sangre De Cristo Electric Association, Inc.	601	247	601	-
15	Southeast Colorado Power Association	1,004	439	673	331
16	United Power, Inc.	7,730	3,468	7,730	-
17	White River Electric Association, Inc.	200	133	200	-
18	Y-W Electric Association, Inc.	1,143	-	-	1,143
19	<b>Total Colorado</b>	<b>31,743</b>	<b>9,760</b>	<b>20,143</b>	<b>11,598</b>
<b>Additional Retail DG Supply</b>					
	<b>Additional Retail DG Supply W/out Multiplier</b>	<b>Additional Retail DG Supply Including Multiplier</b>		<b>Vintage</b>	
20	Tri-State Renewable Retirements (CO RES) Additional Qualifying P117 Resources	11,126	11,598	2017/2021	
21	<b>Total Additional Retail DG Retirements</b>	<b>11,126</b>	<b>11,598</b>		

Important Notes:

- 1) Deducted only line 5 of F7 part R/O which designates Large Industrial above 1000kV
- 2) Includes 2017 and 2021 vintage
- 3) Remaining 2021 Requirement is rounded to nearest whole number

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2021 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

2021 Distributed Generation (DG) Requirement Calculation							
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
Line No.	Colorado Members	2021 Form 7 Total Colorado Electric Sales (MWh)	2021 Form 7 Total Meters	2021 DG Requirement (%)	2021 DG Requirement (MWh)	Less: 2021 Retail DG Requirement (MWh)	Net 2021 DG Requirement Remaining (MWh)
1	Empire Electric Association, Inc.	501,692	16,651	1.000%	5,017	734	4,283
2	Gunnison County Electric Association, Inc.	123,909	11,353	1.000%	1,239	583	656
3	High West Energy	111,332	2,175	0.750%	835	276	559
4	Highline Electric Association	347,103	8,597	0.750%	2,603	1,095	1,508
5	K.C. Electric Association	222,430	6,616	0.750%	1,668	834	834
6	La Plata Electric Association, Inc.	898,579	45,482	1.000%	8,986	2,858	6,128
7	Morgan County Rural Electric Association	379,745	9,089	0.750%	2,848	1,161	1,687
8	Mountain Parks Electric, Inc.	314,453	21,623	1.000%	3,145	1,435	1,710
9	Mountain View Electric Association, Inc.	927,441	59,406	1.000%	9,274	4,302	4,972
10	Poudre Valley Rural Electric Association, Inc.	1,360,556	49,040	1.000%	13,606	4,287	9,319
11	San Isabel Electric Association, Inc.	430,652	25,434	1.000%	4,307	1,365	2,942
12	San Luis Valley Rural Electric Cooperative, Inc.	221,193	12,980	1.000%	2,212	1,093	1,119
13	San Miguel Power Association, Inc.	208,259	14,221	1.000%	2,083	1,041	1,041
14	Sangre De Cristo Electric Association, Inc.	125,738	13,539	1.000%	1,257	601	657
15	Southeast Colorado Power Association	240,197	10,702	1.000%	2,402	1,004	1,398
16	United Power, Inc.	2,902,460	102,305	1.000%	29,025	7,730	21,294
17	White River Electric Association, Inc.	602,760	3,444	0.750%	4,521	200	4,320
18	Y-W Electric Association, Inc.	372,648	8,848	0.750%	2,795	1,143	1,652
19	<b>Total Colorado</b>	<b>10,291,145</b>			<b>97,821</b>	<b>31,743</b>	<b>66,079</b>

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2021 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

2021 Distributed Generation (DG) Retirement Summary					
(a)	(b)	(c)	(d)	(e)	(f)
Line No.	Colorado Members	2021 DG Requirement (MWh)	Member DG Supply W/out Multiplier (MWh) <sup>1</sup>	Member DG Supply Including Multiplier (RECs)	Net 2021 DG Requirement Remaining (RECs) <sup>2</sup>
1	Empire Electric Association, Inc.	4,283	2,967	4,283	-
2	Gunnison County Electric Association, Inc.	656	-	-	656
3	High West Energy	559	-	-	559
4	Highline Electric Association	1,508	1,508	1,508	-
5	K.C. Electric Association	834	-	-	834
6	La Plata Electric Association, Inc.	6,128	4,902	6,128	-
7	Morgan County Rural Electric Association	1,687	-	-	1,687
8	Mountain Parks Electric, Inc.	1,710	1,710	1,710	-
9	Mountain View Electric Association, Inc.	4,972	-	-	4,972
10	Poudre Valley Rural Electric Association, Inc.	9,319	7,455	9,319	-
11	San Isabel Electric Association, Inc.	2,942	1,471	2,942	-
12	San Luis Valley Rural Electric Cooperative, Inc.	1,119	560	1,119	-
13	San Miguel Power Association, Inc.	1,041	423	1,041	-
14	Sangre De Cristo Electric Association, Inc.	657	657	657	-
15	Southeast Colorado Power Association	1,398	1,398	1,398	-
16	United Power, Inc.	21,294	17,035	21,294	-
17	White River Electric Association, Inc.	4,320	4,320	4,320	-
18	Y-W Electric Association, Inc.	1,652	-	-	1,652
19	<b>Total Colorado</b>	<b>66,079</b>	<b>44,407</b>	<b>55,719</b>	<b>10,360</b>

Tri-State Renewable Retirements (CO RES)	Additional DG Supply W/out Multiplier	Additional DG Supply Including Multiplier	Vintage
20 Additional Qualifying P117 Resources	10,360	10,360	2021
21 <b>Total Additional Retail DG Retirements</b>	<b>10,360</b>	<b>10,360</b>	

Important Notes:

1) 2021 Vintage RECS

2) Remaining 2021 Requirement is rounded to nearest whole number

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