



Empire Electric Association, Inc.

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Submitted electronically

May 28, 2024

Rebecca White, Director
Colorado Public Utility Commission
1560 Broadway, 2nd Floor, Suite 250
Denver, CO 80202

Subject: 2023 Renewable Energy Standard (RES) / Docket No. 24M-0014E

Ms. White:

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 2023 RES requirement as outlined in Rule 3662.

Based on our 2023 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 ¹	58,709	6,598	52,111
Retail Dist. Generation	1,277	807	470
Wholesale Dist. Generation	4,594	4,594	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

¹ 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.



May 23, 2024

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

Subject: 2023 Renewable Energy Standard (RES) / Docket No. 24M-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 2023.

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 1st, 2024, for the prior compliance year (Rule 3662(a)).

In 2023, 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 ¹	58,709	6,598	52,111
Retail Distributed Generation	1,277	807	470
Wholesale Distributed Generation	4,594	4,594	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 2023 RES requirement.

Sincerely,

DocuSigned by:

 Duane D. Highley
 Chief Executive Officer

Enclosures

¹ 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 2023 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS**

Line No.	Colorado Members	2023 Form 7 Colorado Total Retail Electric Sales (MWh) (b)	2023 Colorado RES Requirement at 10% Percent (MWh) (c)	Member Self- Generated Renewable Supplies Before Multiplier ¹ (MWh) (d)	Less: Member Self- Generated Renewable Supplies With Multiplier ¹ (RECs) (e)	Net 2023 (Rounded) Colorado RES Requirement (MWh) (f)
19	Total Colorado	10,727,397	1,394,092	388,525	464,755	929,338
				Additional Resources Used for 2023	Percent of Total Remaining Requirement	
	Tri-State Renewable Retirements (CO RES)	Retirements (MWh)	Resource Multiplier	Retirements w/ Multiplier (RECs)	Requirement	Resource Vintage
20	Additional Retail DG RECs	9,194	various	9,803	1.05%	2019
21	Additional Wholesale DG RECS	11,660	various	11,660	1.25%	2023
22	WAPA Small Hydro, < 30MW - CRSP	47,658	1.25	59,573	6.41%	2019
23	WAPA Small Hydro, < 30MW - LAP	448,561	1.25	560,701	60.33%	2019
24	WAPA Small Hydro, < 30MW - LAP	230,081	1.25	287,601	30.95%	2020
25	Total	747,155		929,338	100.00%	

Important Notes:

1) Resources include supplies from 2019 and 2023 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 2023 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 2023 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS**

2023 Retail DG Requirement Calculation							
(a)	(b)	(c)	(d)	(e)	(f)	(g)	
Line No.	Colorado Members	2023 Form 7 Total Colorado Electric Sales (MWh)	2023 Form 7 Total Industrial Electric Sales (MWh) ¹	2023 Retail Electric Sales (MWh)	2023 Form 7 Total Meters	2023 Retail DG Requirement (%)	2023 Retail DG Requirement (MWh)
19	Total Colorado	10,727,397	3,840,414	6,886,983			33,445

2023 Retail DG Retirement Summary					
(a)	(b)	(c)	(d)	(f)	
Line No.	Colorado Members	2023 Retail DG Requirement (MWh)	Member Retail DG Supply W/out Multiplier (MWh) ²	Member Retail DG Supply Including Multiplier (RECs)	Net 2023 Retail DG Requirement Remaining (RECs) ³
19	Total Colorado	33,445	17,271	23,642	9,803

Tri-State Renewable Retirements (CO RES)	Additional Retail DG Supply W/out Multiplier	Additional Retail DG Supply Including Multiplier	Vintage
20 Additional Qualifying P117 Resources	9,194	9,803	2019/2023
21 Total Additional Retail DG Retirements	9,194	9,803	

Important Notes:

- 1) Deducted only line 5 of F7 part R/O which designates Large Industrial above 1000kV
- 2) Includes 2019 and 2023 vintage
- 3) Remaining 2023 Requirement is rounded to nearest whole number

**Tri-State Generation and Transmission Association, Inc.
Colorado 2023 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS**

2023 Distributed Generation (DG) Requirement Calculation							
(a)	(b)	(c)	(d)	(e)	(f)	(g)	
Line No.	Colorado Members	2023 Form 7 Total Colorado Electric Sales (MWh)	2023 Form 7 Total Meters	2023 DG Requirement (%)	2023 DG Requirement (MWh)	Less: 2023 Retail DG Requirement (MWh)	Net 2023 DG Requirement Remaining (MWh)
19	Total Colorado	10,727,397			103,517	33,445	70,073

2023 Distributed Generation (DG) Retirement Summary					
(a)	(b)	(c)	(d)	(f)	
Line No.	Colorado Members	2023 DG Requirement (MWh)	Member DG Supply W/out Multiplier (MWh) ¹	Member DG Supply Including Multiplier (RECs)	Net 2023 DG Requirement Remaining (RECs) ²
19	Total Colorado	70,073	48,464	58,413	11,660

Line No.	Tri-State Renewable Retirements RES)	(CO	Additional DG Supply W/out Multiplier	Additional DG Supply Including Multiplier	Vintage
20	Additional Qualifying P117 Resources		11,660	11,660	2023
21	Total Additional Retail DG Retirements		11,660	11,660	

Important Notes:

1) 2023 Vintage RECS

2) Remaining 2023 Requirement is rounded to nearest whole number