



# Empire Electric Association, Inc.

801 N. Broadway P.O. Box K Cortez, CO 81321-0676 Phone (970) 565-4444  
www.eea.coop

Submitted electronically

May 21, 2025

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

**Subject: 2024 Renewable Energy Standard (RES) / Docket No. 25M-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 2024 RES requirement as outlined in Rule 3662.

Based on our 2024 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>	57,583	5,532	52,051
Retail Dist. Generation	560	394	166
Wholesale Dist. Generation	5,198	5,082	116

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.



May 15, 2025

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

**Subject: 2024 Renewable Energy Standard (RES) / Docket No. 25M-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 2024.

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)).

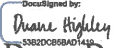
In 2024, your compliance obligation is equal to 20% of your energy requirements and includes a distributed generation (DG) component. The DG requirement is one-tenth (10%) of the total 10% requirement or 1% of total retail sales and a portion of that needs to come from retail DG. The retail DG component 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>	57,583	5,532	52,051
Retail Distributed Generation	560	394	166
Wholesale Distributed Generation	5,198	5,082	116

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 2024 RES requirement.

Sincerely,

DocuSigned by:  
  
 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 2024 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

Line No.	Colorado Members	2024 Form 7 Colorado Total Retail Electric Sales (MWh) (b)	2024 Colorado RES Requirement at 20% Percent (MWh) (c)	Member Self- Generated Renewable Supplies Before Multiplier <sup>1</sup> (MWh) (d)	Less: Member Self- Generated Renewable Supplies With Multiplier <sup>1</sup> (RECs) (e)	Net 2024 (Rounded) Colorado RES Requirement (MWh) (f)
1	Empire Electric Association, Inc.	575,829	57,583	3,929	5,532	52,051
2	Gunnison County Electric Association, Inc.	128,255	12,826	9	16	12,810
3	High West Energy	171,511	17,152	-	-	17,152
4	Highline Electric Association	399,173	39,918	5,463	5,847	34,071
5	K.C. Electric Association	239,483	23,949	-	-	23,949
6	La Plata Electric Association, Inc.	878,239	87,824	54,877	69,917	17,907
7	Morgan County Rural Electric Association	473,357	47,336	962	1,203	46,133
8	Mountain Parks Electric, Inc.	343,131	34,314	9,522	9,522	24,792
9	Mountain View Electric Association, Inc.	983,145	98,315	-	-	98,315
10	Poudre Valley Rural Electric Association, Inc.	1,546,274	154,628	47,044	52,194	102,434
11	San Isabel Electric Association, Inc.	410,690	41,070	13,066	25,720	15,350
12	San Luis Valley Rural Electric Cooperative, Inc.	203,508	20,351	2,267	2,582	17,769
13	San Miguel Power Association, Inc.	215,840	21,584	1,735	5,206	16,378
14	Sangre De Cristo Electric Association, Inc.	131,989	13,199	3,130	3,176	10,023
15	Southeast Colorado Power Association	255,918	25,592	2,110	2,237	23,355
16	White River Electric Association, Inc.	531,078	53,108	6,239	6,333	46,775
17	Y-W Electric Association, Inc.	396,769	39,677	-	-	39,677
	<b>Total Colorado</b>	<b>7,884,188</b>	<b>788,426</b>	<b>150,353</b>	<b>189,485</b>	<b>598,941</b>

	Tri-State Renewable Retirements (CO RES)	Additional Resources Used for 2024 Retirements (MWh)	Resource Multiplier	Additional Resources Used for 2024 Retirements w/ Multiplier (RECs)	Percent of Total Remaining Requirement	Resource Vintage
1	Additional Retail DG RECs	14,167	various	14,167	2.37%	2024
2	Additional Wholesale DG RECS	25,747	various	31,145	5.20%	2024
3	WAPA Small Hydro, < 30MW - CRSP	42,864	1.25	53,580	8.95%	2020
4	WAPA Small Hydro, < 30MW - LAP	308,680	1.25	385,850	64.42%	2020
5	WAPA Small Hydro, < 30MW - LAP	91,359	1.25	114,199	19.07%	2021
6	<b>Total</b>	<b>482,817</b>		<b>598,941</b>	<b>100.00%</b>	

*Important Notes:*

1) Resources include supplies from 2024 for members 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 2024 Requirement is rounded to nearest whole number

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2024 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

2024 Retail DG Requirement Calculation							
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
Line No.	Colorado Members	2024 Form 7 Total Colorado Electric Sales (MWh)	2024 Form 7 Total Industrial Electric Sales (MWh)1	2024 Retail Electric Sales (MWh)	2024 Form 7 Total Meters	2024 Retail DG Requirement (%)	2024 Retail DG Requirement (MWh)
1	Empire Electric Association, Inc.	575,829	463,827	112,002	17,126	0.500%	560
2	Gunnison County Electric Association, Inc.	128,255	8,551	119,704	11,738	0.500%	599
3	High West Energy	171,511	151,763	19,748	2,803	0.375%	74
4	Highline Electric Association	399,173	105,003	294,170	8,956	0.375%	1,103
5	K.C. Electric Association	239,483	42,302	197,181	6,609	0.375%	739
6	La Plata Electric Association, Inc.	878,239	337,170	541,069	47,003	0.500%	2,705
7	Morgan County Rural Electric Association	473,357	77,289	396,068	9,573	0.375%	1,485
8	Mountain Parks Electric, Inc.	343,131	45,232	297,898	23,021	0.500%	1,489
9	Mountain View Electric Association, Inc.	983,145	79,871	903,274	65,098	0.500%	4,516
10	Poudre Valley Rural Electric Association, Inc.	1,546,274	935,004	611,270	55,348	0.500%	3,056
11	San Isabel Electric Association, Inc.	410,690	156,393	254,297	26,118	0.500%	1,271
12	San Luis Valley Rural Electric Cooperative, Inc.	203,508	3,707	199,801	13,285	0.500%	999
13	San Miguel Power Association, Inc.	215,840	-	215,840	14,990	0.500%	1,079
14	Sangre De Cristo Electric Association, Inc.	131,989	5,714	126,275	14,568	0.500%	631
15	Southeast Colorado Power Association	255,918	45,276	210,642	10,935	0.500%	1,053
16	White River Electric Association, Inc.	531,078	522,654	8,424	3,487	0.375%	32
17	Y-W Electric Association, Inc.	396,769	101,904	294,865	8,851	0.375%	1,106
18	Total Colorado	7,884,188	3,081,661	4,802,527			22,500

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2024 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

2024 Retail DG Retirement Summary					
	(a)	(b)	(c)	(d)	(f)
Line No.	Colorado Members	2024 Retail DG Requirement (MWh)	Member Retail DG Supply W/out Multiplier (MWh) <sup>2</sup>	Member Retail DG Supply Including Multiplier (RECs)	Net 2024 Retail DG Requirement Remaining (RECs) <sup>3</sup>
1	Empire Electric Association, Inc.	560	394	394	166
2	Gunnison County Electric Association, Inc.	599	3	3	595
3	High West Energy	74	-	-	74
4	Highline Electric Association	1,103	467	487	616
5	K.C. Electric Association	739	-	-	739
6	La Plata Electric Association, Inc.	2,705	1,878	2,705	-
7	Morgan County Rural Electric Association	1,485	809	1,049	436
8	Mountain Parks Electric, Inc.	1,489	-	-	1,489
9	Mountain View Electric Association, Inc.	4,516	-	-	4,516
10	Poudre Valley Rural Electric Association, Inc.	3,056	912	2,735	321
11	San Isabel Electric Association, Inc.	1,271	110	147	1,124
12	San Luis Valley Rural Electric Cooperative, Inc.	999	-	-	999
13	San Miguel Power Association, Inc.	1,079	-	-	1,079
14	Sangre De Cristo Electric Association, Inc.	631	186	232	399
15	Southeast Colorado Power Association	1,053	508	577	476
16	White River Electric Association, Inc.	32	-	-	32
17	Y-W Electric Association, Inc.	1,106	-	-	1,106
18	<b>Total Colorado</b>	<b>22,500</b>	<b>5,265</b>	<b>8,330</b>	<b>14,167</b>

	Additional Retail DG Supply W/out Multiplier	Additional Retail DG Supply Including Multiplier	Vintage
19	Tri-State Renewable Retirements (CO RES)		
19	Additional Qualifying P117 Resources	14,167	2024
20	<b>Total Additional Retail DG Retirements</b>	<b>14,167</b>	<b>14,167</b>

Important Notes:

- 1) Deducted only line 5 of F7 part R/O which designates Large Industrial above 1000kV
- 2) Remaining 2024 Requirement is rounded to nearest whole number

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2024 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

<b>2024 Distributed Generation (DG) Requirement Calculation</b>							
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
<i>Line No.</i>	<b>Colorado Members</b>	<b>2024 Form 7 Total Colorado Electric Sales (MWh)</b>	<b>2024 Form 7 Total Meters</b>	<b>2024 DG Requirement (%)</b>	<b>2024 DG Requirement (MWh)</b>	<b>Less: 2024 Retail DG Requirement (MWh)</b>	<b>Net 2024 DG Requirement Remaining (MWh)</b>
1	Empire Electric Association, Inc.	575,829	17,126	1.000%	5,758	560	5,198
2	Gunnison County Electric Association, Inc.	128,255	11,738	1.000%	1,283	599	684
3	High West Energy	171,511	2,803	0.750%	1,286	74	1,212
4	Highline Electric Association	399,173	8,956	0.750%	2,994	1,103	1,891
5	K.C. Electric Association	239,483	6,609	0.750%	1,796	739	1,057
6	La Plata Electric Association, Inc.	878,239	47,003	1.000%	8,782	2,705	6,077
7	Morgan County Rural Electric Association	473,357	9,573	0.750%	3,550	1,485	2,065
8	Mountain Parks Electric, Inc.	343,131	23,021	1.000%	3,431	1,489	1,942
9	Mountain View Electric Association, Inc.	983,145	65,098	1.000%	9,831	4,516	5,315
10	Poudre Valley Rural Electric Association, Inc.	1,546,274	55,348	1.000%	15,463	3,056	12,406
11	San Isabel Electric Association, Inc.	410,690	26,118	1.000%	4,107	1,271	2,835
12	San Luis Valley Rural Electric Cooperative, Inc.	203,508	13,285	1.000%	2,035	999	1,036
13	San Miguel Power Association, Inc.	215,840	14,990	1.000%	2,158	1,079	1,079
14	Sangre De Cristo Electric Association, Inc.	131,989	14,568	1.000%	1,320	631	689
15	Southeast Colorado Power Association	255,918	10,935	1.000%	2,559	1,053	1,506
16	White River Electric Association, Inc.	531,078	3,487	0.750%	3,983	32	3,951
17	Y-W Electric Association, Inc.	396,769	8,851	0.750%	2,976	1,106	1,870
18	<b>Total Colorado</b>	<b>7,884,188</b>			<b>73,313</b>	<b>22,500</b>	<b>50,814</b>

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2024 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

<b>2022 Distributed Generation (DG) Retirement Summary</b>					
<i>(a)</i>	<i>(b)</i>	<i>(c)</i>	<i>(d)</i>	<i>(e)</i>	<i>(f)</i>
<i>Line No.</i>	<b>Colorado Members</b>	<b>2024 DG Requirement (MWh)</b>	<b>Member DG Supply W/out Multiplier (MWh)<sup>1</sup></b>	<b>Member DG Supply Including Multiplier (RECs)</b>	<b>Net 2024 DG Requirement Remaining (RECs)<sup>2</sup></b>
1	Empire Electric Association, Inc.	5,198	3,517	5,082	116
2	Gunnison County Electric Association, Inc.	684	-	-	684
3	High West Energy	1,212	-	-	1,212
4	Highline Electric Association	1,891	-	-	1,891
5	K.C. Electric Association	1,057	-	-	1,057
6	La Plata Electric Association, Inc.	6,077	3,885	4,948	1,129
7	Morgan County Rural Electric Association	2,065	154	154	1,911
8	Mountain Parks Electric, Inc.	1,942	-	-	1,942
9	Mountain View Electric Association, Inc.	5,315	-	-	5,315
10	Poudre Valley Rural Electric Association, Inc.	12,406	12,110	12,110	297
11	San Isabel Electric Association, Inc.	2,835	340	340	2,495
12	San Luis Valley Rural Electric Cooperative, Inc.	1,036	1,007	1,007	29
13	San Miguel Power Association, Inc.	1,079	-	-	1,079
14	Sangre De Cristo Electric Association, Inc.	689	-	-	689
15	Southeast Colorado Power Association	1,506	1,385	1,443	63
16	White River Electric Association, Inc.	3,951	-	-	3,951
17	Y-W Electric Association, Inc.	1,870	-	-	1,870
18	<b>Total Colorado</b>	<b>50,814</b>	<b>22,397</b>	<b>25,083</b>	<b>25,730</b>

	<b>Tri-State Renewable Retirements (RES)</b>	<b>(CO)</b>	<b>Additional DG Supply W/out Multiplier</b>	<b>Additional DG Supply Including Multiplier</b>	<b>Vintage</b>
19	Additional Qualifying P117 Resources		25,747	31,145	2024
20	<b>Total Additional Retail DG Retirements</b>		<b>25,747</b>	<b>31,145</b>	

Important Notes:

1) 2024 Vintage RECS

2) Remaining 2024 Requirement is rounded to nearest whole number