



# Empire Electric Association, Inc.

23999 Road L.4 P.O. Box K Cortez, CO 81321-0676 Phone (970) 565-4444  
www.eea.coop

Submitted electronically

May 08, 2026

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

**Subject: 2025 Renewable Energy Standard (RES) / Docket No. 26M-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 2025 RES requirement as outlined in Rule 3662.

Based on our 2025 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>	54,278	6,507	47,771
Retail Dist. Generation	558	558	0
Wholesale Dist. Generation	4,870	4,870	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.



May 6, 2026

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

**Subject: 2025 Renewable Energy Standard (RES) / Docket No. 26M-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 2025.

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, 2026, for the prior compliance year (Rule 3662(a)).

In 2025, 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>	54,278	6,507	47,771
Retail Distributed Generation	558	558	0
Wholesale Distributed Generation	4,870	4,870	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 2025 RES requirement.

Sincerely,

*Duane Highley*  
 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 2025 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

<u>Line No.</u>	<u>Colorado Members</u>	<b>2025 Form 7 Colorado Total Retail Electric Sales</b>	<b>2025 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 2025 (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.	542,774	54,278	4,969	6,507	47,771
2	Gunnison County Electric Association, Inc.	127,576	12,758	-	-	12,758
3	High West Energy	200,904	20,091	-	-	20,091
4	Highline Electric Association	520,957	52,096	3,231	3,251	48,845
5	K.C. Electric Association	243,002	24,301	-	-	24,301
6	La Plata Electric Association, Inc. <sup>6</sup>	887,472	88,748	55,835	69,192	19,556
7	Morgan County Rural Electric Association	585,244	58,525	1,144	1,411	57,114
8	Mountain View Electric Association, Inc.	978,486	97,849	703	703	97,146
9	Poudre Valley Rural Electric Association, Inc.	1,676,236	167,624	58,516	65,090	102,534
10	San Isabel Electric Association, Inc.	441,061	44,107	18,432	27,730	16,377
11	San Luis Valley Rural Electric Cooperative, Inc.	207,259	20,726	3,263	3,560	17,166
12	San Miguel Power Association, Inc.	213,650	21,365	1,621	4,862	16,503
13	Sangre De Cristo Electric Association, Inc.	132,207	13,221	10,624	13,221	(0)
14	Southeast Colorado Power Association	225,708	22,571	6,529	6,645	15,926
15	White River Electric Association, Inc.	526,252	52,626	4,567	4,663	47,963
16	Y-W Electric Association, Inc.	385,120	38,512	-	-	38,512
17	<b>Total Colorado</b>	<b>7,893,908</b>	<b>789,398</b>	<b>169,434</b>	<b>206,836</b>	<b>582,562</b>

<u>Tri-State Renewable Retirements (CO RES)</u>	<b>Additional Resources Used for 2025 Retirements (MWh)</b>	<b>Resource Multiplier</b>	<b>Additional Resources Used for 2025 Retirements w/ Multiplier (RECs)</b>	<b>Percent of Total Remaining Requirement</b>	<b>Resource Vintage</b>	
18	Additional Retail DG RECs	7,737	various	7,737	1.33%	2025
19	Additional Wholesale DG RECS	8,418	various	12,497	2.15%	2025
20	WAPA Small Hydro, < 30MW - LAP	427,153	1.25	533,941	91.65%	2025
21	Niyol Wind	28,387	N/A	28,387	4.87%	2025
22	<b>Total</b>	<b>471,694</b>		<b>582,562</b>	<b>100.00%</b>	

*Important Notes:*

- 1) Resources include supplies from 2025 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 2025 Requirement is rounded to nearest whole number
- 6) 3,237 RECs retired by LPEA for purposes of meeting its Colorado RES requirement.

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2025 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

<b>2025 Retail DG Requirement Calculation</b>							
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
<i>Line No.</i>	<b>Colorado Members</b>	<b>2025 Form 7 Total Colorado Electric Sales (MWh)</b>	<b>2025 Form 7 Total Industrial Electric Sales (MWh)1</b>	<b>2025 Retail Electric Sales (MWh)</b>	<b>2025 Form 7 Total Meters</b>	<b>2025 Retail DG Requirement (%)</b>	<b>2025 Retail DG Requirement (MWh)</b>
1	Empire Electric Association, Inc.	542,774	431,172	111,601	17,201	0.500%	558
2	Gunnison County Electric Association, Inc.	127,576	8,121	119,455	11,879	0.500%	597
3	High West Energy	200,904	148,963	51,940	2,770	0.375%	195
4	Highline Electric Association	520,957	212,174	308,782	8,605	0.375%	1,158
5	K.C. Electric Association	243,002	102,026	140,976	6,619	0.375%	529
6	La Plata Electric Association, Inc.	887,472	315,579	571,893	47,490	0.500%	2,859
7	Morgan County Rural Electric Association	585,244	128,902	456,343	9,654	0.375%	1,711
8	Mountain View Electric Association, Inc.	978,486	78,841	899,645	66,556	0.500%	4,498
9	Poudre Valley Rural Electric Association, Inc.	1,676,236	1,135,140	541,096	56,750	0.500%	2,705
10	San Isabel Electric Association, Inc.	441,061	192,925	248,136	26,218	0.500%	1,241
11	San Luis Valley Rural Electric Cooperative, Inc.	207,259	6,079	201,180	13,289	0.500%	1,006
12	San Miguel Power Association, Inc.	213,650	-	213,650	15,188	0.500%	1,068
13	Sangre De Cristo Electric Association, Inc.	132,207	5,335	126,872	14,818	0.500%	634
14	Southeast Colorado Power Association	225,708	36,547	189,161	10,971	0.500%	946
15	White River Electric Association, Inc.	526,252	515,832	10,420	3,512	0.375%	39
16	Y-W Electric Association, Inc.	385,120	108,927	276,193	8,752	0.375%	1,036
17	<b>Total Colorado</b>	<b>7,893,908</b>	<b>3,426,564</b>	<b>4,467,344</b>			<b>20,781</b>

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2025 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

2025 Retail DG Retirement Summary					
(a)	(b)	(c)	(d)	(f)	
Line No.	Colorado Members	2025 Retail DG Requirement (MWh)	Member Retail DG Supply W/out Multiplier (MWh) <sup>2</sup>	Member Retail DG Supply Including Multiplier (RECs)	Net 2025 Retail DG Requirement Remaining (RECs) <sup>3</sup>
1	Empire Electric Association, Inc.	558	197	558	-
2	Gunnison County Electric Association, Inc.	597	-	-	597
3	High West Energy	195	-	-	195
4	Highline Electric Association	1,158	474	478	680
5	K.C. Electric Association	529	-	-	529
6	La Plata Electric Association, Inc.	2,859	2,859	2,859	-
7	Morgan County Rural Electric Association	1,711	1,144	1,411	300
8	Mountain View Electric Association, Inc.	4,498	99	99	4,400
9	Poudre Valley Rural Electric Association, Inc.	2,705	2,705	2,705	-
10	San Isabel Electric Association, Inc.	1,241	1,241	1,241	-
11	San Luis Valley Rural Electric Cooperative, Inc.	1,006	1,006	1,006	-
12	San Miguel Power Association, Inc.	1,068	356	1,068	-
13	Sangre De Cristo Electric Association, Inc.	634	634	634	-
14	Southeast Colorado Power Association	946	938	946	-
15	White River Electric Association, Inc.	39	39	39	-
16	Y-W Electric Association, Inc.	1,036	-	-	1,036
17	<b>Total Colorado</b>	<b>20,781</b>	<b>11,692</b>	<b>13,044</b>	<b>7,737</b>

		Additional Retail		
Tri-State Renewable Retirements (CO RES)		Additional Retail DG Supply W/out Multiplier	DG Supply Including Multiplier	Vintage
18	Additional Qualifying P117 Resources	7,737	7,737	2025
19	<b>Total Additional Retail DG Retirements</b>	<b>7,737</b>	<b>7,737</b>	

Important Notes:

- 1) Deducted only line 5 of F7 part R/O which designates Large Industrial above 1000kV
- 2) Remaining 2025 Requirement is rounded to nearest whole number

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2025 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

2025 Distributed Generation (DG) Requirement Calculation							
(a)	(b)	(c)	(d)	(e)	(f)	(g)	
Line No.	Colorado Members	2025 Form 7 Total Colorado Electric Sales (MWh)	2025 Form 7 Total Meters	2025 DG Requirement (%)	2025 DG Requirement (MWh)	Less: 2025 Retail DG Requirement (MWh)	Net 2025 DG Requirement Remaining (MWh)
1	Empire Electric Association, Inc.	542,774	17,201	1.000%	5,428	558	4,870
2	Gunnison County Electric Association, Inc.	127,576	11,879	1.000%	1,276	597	678
3	High West Energy	200,904	2,770	0.750%	1,507	195	1,312
4	Highline Electric Association	520,957	8,605	0.750%	3,907	1,158	2,749
5	K.C. Electric Association	243,002	6,619	0.750%	1,823	529	1,294
6	La Plata Electric Association, Inc.	887,472	47,490	1.000%	8,875	2,859	6,015
7	Morgan County Rural Electric Association	585,244	9,654	0.750%	4,389	1,711	2,678
8	Mountain View Electric Association, Inc.	978,486	66,556	1.000%	9,785	4,498	5,287
9	Poudre Valley Rural Electric Association, Inc.	1,676,236	56,750	1.000%	16,762	2,705	14,057
10	San Isabel Electric Association, Inc.	441,061	26,218	1.000%	4,411	1,241	3,170
11	San Luis Valley Rural Electric Cooperative, Inc.	207,259	13,289	1.000%	2,073	1,006	1,067
12	San Miguel Power Association, Inc.	213,650	15,188	1.000%	2,136	1,068	1,068
13	Sangre De Cristo Electric Association, Inc.	132,207	14,818	1.000%	1,322	634	688
14	Southeast Colorado Power Association	225,708	10,971	1.000%	2,257	946	1,311
16	White River Electric Association, Inc.	526,252	3,512	0.750%	3,947	39	3,908
17	Y-W Electric Association, Inc.	385,120	8,752	0.750%	2,888	1,036	1,853
18	<b>Total Colorado</b>	<b>7,893,908</b>			<b>72,785</b>	<b>20,781</b>	<b>52,004</b>

**Tri-State Generation and Transmission Association, Inc.**  
**Colorado 2025 Renewable Energy Standard (RES) Compliance Report**  
**COMPLIANCE (MANDATORY) REQUIREMENTS**

<b>2025 Distributed Generation (DG) Retirement Summary</b>					
(a)	(b)	(c)	(d)	(e)	(f)
Line No.	Colorado Members	2025 DG Requirement (MWh)	Member DG Supply W/out Multiplier (MWh) <sup>1</sup>	Member DG Supply Including Multiplier (RECs)	Net 2025 DG Requirement Remaining (RECs) <sup>2</sup>
1	Empire Electric Association, Inc.	4,870	4,397	4,870	-
2	Gunnison County Electric Association, Inc.	678	-	-	678
3	High West Energy	1,312	-	-	1,312
4	Highline Electric Association	2,749	2,749	2,749	-
5	K.C. Electric Association	1,294	-	-	1,294
6	La Plata Electric Association, Inc.	6,015	4,812	6,015	-
7	Morgan County Rural Electric Association	2,678	-	-	2,678
8	Mountain View Electric Association, Inc.	5,287	604	604	4,682
9	Poudre Valley Rural Electric Association, Inc.	14,057	14,057	14,057	-
10	San Isabel Electric Association, Inc.	3,170	1,585	3,170	-
11	San Luis Valley Rural Electric Cooperative, Inc.	1,067	1,067	1,067	-
12	San Miguel Power Association, Inc.	1,068	356	1,068	-
13	Sangre De Cristo Electric Association, Inc.	688	688	688	-
14	Southeast Colorado Power Association	1,311	1,311	1,311	-
15	White River Electric Association, Inc.	3,908	3,908	3,908	-
16	Y-W Electric Association, Inc.	1,853	-	-	1,853
17	<b>Total Colorado</b>	<b>52,004</b>	<b>35,534</b>	<b>39,508</b>	<b>12,497</b>

Tri-State Renewable Retirements (RES)	(CO)	Additional DG Supply W/out Multiplier	Additional DG Supply Including Multiplier	Vintage
18	Additional Qualifying P117 Resources	8,418	12,497	2025
19	<b>Total Additional Retail DG Retirements</b>	<b>8,418</b>	<b>12,497</b>	

*Important Notes:*

1) 2025 Vintage RECS

2) Remaining 2025 Requirement is rounded to nearest whole number