



# Empire Electric Association, Inc.

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

May 01, 2019

Submitted electronically

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

**Subject: 2018 Renewable Portfolio Standard (RPS)/Docket NO. 19M-0014E**

Mr. Dean:

In compliance with the passage of the Colorado Renewable Portfolio Standard ("RPS"), this letter serves as Empire Electric Association's ("Empire's") report of meeting its 2018 RPS requirement as outlined in Rule 3662.

Based on our 2018 retail sales, Empire's compliance obligation of 6% of our energy requirements was 47,426 MWhs. Empire's own renewable resources produced 4,287 renewable energy credits ("RECs") in 2018. Therefore, our power supplier, Tri-State Generation and Transmission, Inc. ("Tri-State"), retired 43,140 RECs on Empire's behalf from their Colorado eligible RPS resources, which includes the multipliers for selected fuels and technologies.

Also attached is a letter from Tri-State attesting to the permanent retirement of 43,140 RECs on Empire's behalf.

If you have any questions regarding this matter, please contact us.

Sincerely,

Josh Dellinger  
General Manager  
Empire Electric Association

Attachments



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

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

April 24, 2019

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

**Subject: 2018 Renewable Portfolio Standard (RPS) / Docket No. 19M-0014E**

Dear Mr. Dellinger,

This letter is sent to you for your use in compliance with your Colorado Renewable Portfolio Standard. Tri-State, as your power supplier, is attesting with this letter and the enclosed document that we have permanently retired enough renewable energy credits (RECs) to meet your 2018 Colorado Renewable Portfolio Standard obligation.

With the passage of a statewide Renewable Portfolio Standard (RPS) in Colorado, Tri-State and its Member Systems were jointly affected by these standards. While Tri-State has the responsibility of meeting the long-term power supply requirements of its Member Systems, the RPS requirements apply specifically to the Member Systems. Tri-State has acquired the necessary renewable energy credits to meet the Member Systems' requirements, which the Member Systems do not fulfill on their own. Colorado RPS rules require qualifying utilities to report on compliance by June 1<sup>st</sup> for the prior compliance year (Rule 3662(a)).

In accordance with our records and Empire Electric's 2018 retail sales, your compliance obligation of 6 percent of your energy requirements for 2018 was 47,426 MWhs. Our records also indicate that your system had its own renewable resources on-line in 2018 that produced 4,287 RECs. Therefore, Tri-State, to meet our obligation for you under the Contract, has retired 43,140 RECs on your behalf from Colorado eligible RPS resources, which includes the multipliers for selected fuels and technologies.

It is your responsibility and requirement to file this letter and attachment with the Colorado Public Utilities Commission to demonstrate Empire Electric's compliance with the 2018 RPS requirement.

Sincerely,

Duane D. Highley  
Chief Executive Officer

Enclosures

**AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER**

A Touchstone Energy\* Cooperative



CRAIG STATION  
P.O. BOX 1307  
CRAIG, CO 81626-1307  
970-824-4411

ESCALANTE STATION  
P.O. BOX 577  
PREWITT, NM 87045  
505-876-2271

NUCLA STATION  
P.O. BOX 698  
NUCLA, CO 81424-0698  
970-864-7316

**Tri-State Generation and Transmission Association, Inc.  
Colorado 2018 Renewable Portfolio Standard (RPS) Compliance Report  
COMPLIANCE (MANDATORY) REQUIREMENTS**

Line No.	Colorado Members	2018 Form 7		2018 Colorado RPS Requirement at 6 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 2018 (Rounded) Colorado RPS Requirement (MWh) (f)
		Colorado Total Retail Electric Sales (MWh) (b)	2018 Colorado RPS Requirement at 6 Percent (MWh) (c)				
1	Delta Montrose Electric Association	515,492	30,930	15,465	30,930	30,930	-
2	Empire Electric Association, Inc.	790,437	47,426	1,896	4,287	4,287	43,140
3	Gunnison County Electric Association, Inc.	117,958	7,078	-	-	-	7,078
4	High West Energy	138,624	8,318	-	-	-	8,318
5	Highline Electric Association	419,558	25,173	17,512	21,890	21,890	3,284
6	K.C. Electric Association	203,933	12,236	-	-	-	12,236
7	La Plata Electric Association, Inc.	956,958	57,417	38,236	57,417	57,417	-
8	Morgan County Rural Electric Association	366,624	21,998	-	-	-	21,998
9	Mountain Parks Electric, Inc.	301,307	18,078	5,302	5,302	5,302	12,777
10	Mountain View Electric Association, Inc.	869,853	52,192	-	-	-	52,192
11	Poudre Valley Rural Electric Association, Inc.	1,320,427	79,226	43,629	52,661	52,661	26,565
12	San Isabel Electric Association, Inc.	464,310	27,859	13,929	27,859	27,859	-
13	San Luis Valley Rural Electric Cooperative, Inc.	223,777	13,427	922	1,844	1,844	11,583
14	San Miguel Power Association, Inc.	197,323	11,839	4,813	8,907	8,907	2,933
15	Sangre De Cristo Electric Association, Inc.	114,931	6,896	2,273	5,208	5,208	1,688
16	Southeast Colorado Power Association	205,601	12,336	7,727	7,727	7,727	4,610
17	United Power, Inc.	2,413,697	144,822	121,417	144,822	144,822	-
18	White River Electric Association, Inc.	824,957	49,497	568	568	568	48,920
19	Y-W Electric Association, Inc.	334,728	20,084	-	-	-	20,084
20	<b>Total Colorado</b>	<b>10,780,497</b>	<b>646,832</b>	<b>273,689</b>	<b>369,431</b>	<b>369,431</b>	<b>277,406</b>

Line No.	Colorado Members	Resources Used for 2018		Resource Multiplier	Percent of Total	Resource Vintage
		Resources Used for 2018 (MWh) Retirements (MWh) (CO RES)	Resources Used for 2018 Retirements w/ Multiplier (RECs)			
21	2018 Excess P117 RECs	31,086	various	50,920	18.36%	2018
22	Kit Carson Windpower, LLC	47,279	1.25	59,099	21.30%	2013
23	Cimarron Solar	15,223	3.00	45,669	16.46%	2013
24	Colorado Highlands	88,364	1.25	110,455	39.82%	2013
25	WAPA Small Hydro, < 30MW - LAP, CO	11,263	1.00	11,263	4.06%	2013
26	<b>Total</b>	<b>193,215</b>		<b>277,406</b>	<b>100.00%</b>	

**Important Notes:**

- 1) Resources include supplies from 2018 for members, if available
- 2) 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.
- 3) 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.
- 4) Remaining 2018 Requirement is rounded to nearest whole number
- 5) Please note a revision to the 2017 RPS Compliance Summary Spreadsheet. The number of MWh for LPEA contained a transposition error and should have been 24,108 vs 24,018. This revision did not impact the number of RECs retired.