



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 1st 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 ¹ (MWh) (d)		Less: Member Self-Generated Renewable Supplies With Multiplier ¹ (RECs) (e)		Net 2018 (Rounded) Colorado RPS Requirement (MWh) (f)
		Retail Electric Sales (MWh) (b)	Colorado Total		Member Self-Generated Renewable Supplies Before Multiplier ¹ (MWh) (d)	Less: Member Self-Generated Renewable Supplies With Multiplier ¹ (RECs) (e)			
1	Delta Montrose Electric Association	515,492	30,930	30,930	15,465	30,930	-	43,140	
2	Empire Electric Association, Inc.	790,437	47,426	47,426	1,896	4,287	-	7,078	
3	Gunnison County Electric Association, Inc.	117,958	7,078	7,078	-	-	-	8,318	
4	High West Energy	138,624	8,318	8,318	-	-	-	3,284	
5	Highline Electric Association	419,558	25,173	25,173	17,512	21,890	-	12,236	
6	K.C. Electric Association	203,933	12,236	12,236	-	-	-	-	
7	La Plata Electric Association, Inc.	956,958	57,417	57,417	38,236	57,417	-	21,998	
8	Morgan County Rural Electric Association	366,624	21,998	21,998	-	-	-	12,777	
9	Mountain Parks Electric, Inc.	301,307	18,078	18,078	5,302	5,302	-	52,192	
10	Mountain View Electric Association, Inc.	869,853	52,192	52,192	-	-	-	26,565	
11	Poudre Valley Rural Electric Association, Inc.	1,320,427	79,226	79,226	43,629	52,661	-	-	
12	San Isabel Electric Association, Inc.	464,310	27,859	27,859	13,929	27,859	-	11,583	
13	San Luis Valley Rural Electric Cooperative, Inc.	223,777	13,427	13,427	922	1,844	-	2,933	
14	San Miguel Power Association, Inc.	197,323	11,839	11,839	4,813	8,907	-	1,688	
15	Sangre De Cristo Electric Association, Inc.	114,931	6,896	6,896	2,273	5,208	-	4,610	
16	Southeast Colorado Power Association	205,601	12,336	12,336	7,727	7,727	-	-	
17	Southeast Colorado Power Association	2,413,697	144,822	144,822	121,417	144,822	-	48,920	
18	White River Electric Association, Inc.	824,957	49,497	49,497	568	578	-	20,084	
19	Y-W Electric Association, Inc.	334,728	20,084	20,084	-	-	-	-	
20	Total Colorado	10,780,497	646,832	646,832	273,689	369,431	369,431	277,406	

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

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.