



Empire Electric Association, Inc.

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May 01, 2020

Submitted electronically

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

Subject: 2019 Renewable Portfolio Standard (RPS) / Docket No. 20M-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 2019 RPS requirement as outlined in Rule 3662.

Based on our 2019 retail sales, Empire’s compliance obligation of 6% of our energy requirements was 50,029 MWhs. Empire’s own renewable resources produced 4,392 renewable energy credits (“RECs”) in 2019. Therefore, our power supplier, Tri-State Generation and Transmission, Inc. (“Tri-State”), retired 45,637 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 45,637 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



April 29, 2020

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

Subject: 2019 Renewable Portfolio Standard (RPS) / Docket No. 20M-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 2019 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 2019 retail sales, your compliance obligation of 6 percent of your energy requirements for 2019 was 50,029 MWhs. Our records also indicate that your system had its own renewable resources on-line in 2019 that produced 4,392 RECs. Therefore, Tri-State, to meet our obligation for you under the Contract, has retired 45,637 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 2019 RPS requirement.

Sincerely,

Duane Highley
Duane Highley (Apr 28, 2020)

Duane D. Highley
Chief Executive Officer

Enclosures

Tri-State Generation and Transmission Association, Inc.
Colorado 2019 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

<u>Line No.</u>	<u>Colorado Members</u>	<u>2019 Form 7 Colorado Total Retail Electric Sales</u>	<u>2019 Colorado RPS Requirement at 6 Percent</u>	<u>Member Self- Generated Renewable Supplies Before Multiplier¹</u>	<u>Less: Member Self- Generated Renewable Supplies With Multiplier¹</u>	<u>Net 2019 (Rounded) Colorado RPS Requirement</u>
	<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	Delta Montrose Electric Association	524,693	31,482	15,804	31,482	-
2	Empire Electric Association, Inc.	833,813	50,029	2,128	4,392	45,637
3	Gunnison County Electric Association, Inc.	124,395	7,464	-	-	7,464
4	High West Energy	127,893	7,674	-	-	7,674
5	Highline Electric Association	355,014	21,301	17,041	21,301	-
6	K.C. Electric Association	215,279	12,917	-	-	12,917
7	La Plata Electric Association, Inc.	965,838	57,951	45,750	57,951	-
8	Morgan County Rural Electric Association	378,844	22,731	-	-	22,731
9	Mountain Parks Electric, Inc.	314,112	18,847	4,893	4,893	13,954
10	Mountain View Electric Association, Inc.	868,962	52,138	-	-	52,138
11	Poudre Valley Rural Electric Association, Inc.	1,329,631	79,778	47,809	55,728	24,050
12	San Isabel Electric Association, Inc.	424,326	25,460	12,730	25,460	-
13	San Luis Valley Rural Electric Cooperative, Inc.	209,872	12,593	1,454	2,908	9,685
14	San Miguel Power Association, Inc.	200,760	12,046	5,568	9,953	2,093
15	Sangre De Cristo Electric Association, Inc.	120,790	7,248	4,519	7,248	-
16	Southeast Colorado Power Association	200,096	12,006	9,058	9,058	2,948
17	United Power, Inc.	2,737,807	164,269	136,041	158,332	5,937
18	White River Electric Association, Inc.	810,037	48,603	9,602	9,631	38,972
19	Y-W Electric Association, Inc.	335,317	20,120	-	-	20,120
20	Total Colorado	11,077,477	664,657	312,395	398,336	266,320

<u>Tri-State Renewable Retirements (CO RES)</u>	<u>Resources Used for 2019 Retirements (MWh)</u>	<u>Resource Multiplier</u>	<u>Resources Used for 2019 Retirements w/ Multiplier (RECs)</u>	<u>Percent of Total</u>	<u>Resource Vintage</u>	
21	Excess P117 RECs	21,932	various	39,913	14.99%	2019
22	Kit Carson Windpower, LLC	57,873	1.25	72,341	27.16%	2014
23	Cimarron Solar	4,324	3.00	12,972	4.87%	2014
24	Colorado Highlands	109,528	1.25	136,910	51.41%	2014
25	WAPA Small Hydro, < 30MW - LAP, CO	4,185	1.00	4,185	1.57%	2014
26	Total	197,842		266,321	100.00%	

Important Notes:

1) Resources include supplies from 2019 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 2019 Requirement is rounded to nearest whole number