

June 1, 2022

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



Your Touchstone Energy® Cooperative 

Subject: 2021 Renewable Energy Standard (RES) / Docket No. 22M-0014E

Dear Mr. Dean:

In compliance with the passage of the Colorado Renewable Energy Standard (RES), this letter serves as United Power Inc.'s report of meeting its 2021 RES requirement as outlined in Rule 3662.

Based on our 2021 retail sales, United Power Inc.'s compliance obligation of 20% 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., 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 ¹	580,492	202,297	378,195
Retail Dist. Generation	7,730	7,730	0
Wholesale Dist. Generation	21,294	21,294	0

Also attached is a letter from Tri-State attesting to the permanent retirement of these RECs on the behalf of United Power Inc.

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

Sincerely,



Dean Hubbuck
Chief Energy Resource Officer
United Power, Inc.

¹ 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.****HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111**April 27th, 2022

Mark Gabriel
United Power, Inc.
500 Cooperative Way
Brighton, CO 80603

Subject: 2021 Renewable Energy Standard (RES) / Docket No. 22M-0014E

Dear Mr. Gabriel,

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 2021.

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, 2022, for the prior compliance year (Rule 3662(a)).

In 2021, your compliance obligation is equal to 20% of your energy requirements and includes a distributed generation (DG) component. The DG requirement is one-twentieth (5%) of the total 20% 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 ¹	580,492	202,297	378,195
Retail Distributed Generation	7,730	7,730	0
Wholesale Distributed Generation	21,294	21,294	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 2021 RES requirement.

Sincerely,


Duane Highley (Apr 29, 2022 03:46 MDT)

Duane D. Highley
Chief Executive Officer

Enclosures

¹ 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.

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYERA 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 2021 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

Line No.	Colorado Members	2021 Form 7 Colorado Total Retail Electric Sales (MWh) (b)	2021 Colorado RES Requirement at 10% Percent (MWh) (c)	Member Self-Generated Renewable Supplies Before Multiplier' (MWh) (d)	Less: Member Self-Generated Renewable Supplies With Multiplier' (RECs) (e)	Net 2021 (Rounded) Colorado RES Requirement (MWh) (f)
1	Empire Electric Association, Inc.	501,692	50,170	3,416	5,589	44,601
2	Gunnison County Electric Association, Inc.	123,908	12,391	14	35	12,356
3	High West Energy	111,332	11,134	-	-	11,134
4	Highline Electric Association	347,103	34,711	10,969	12,907	21,804
5	K.C. Electric Association	222,430	22,243	-	-	22,243
6	La Plata Electric Association, Inc.	898,579	89,858	55,041	78,402	11,456
7	Morgan County Rural Electric Association	379,745	37,975	145	343	37,632
8	Mountain Parks Electric, Inc.	314,453	31,446	9,128	9,128	22,318
9	Mountain View Electric Association, Inc.	927,441	92,745	-	-	92,745
10	Poudre Valley Rural Electric Association, Inc.	1,360,556	136,056	48,695	60,662	75,364
11	San Isabel Electric Association, Inc.	430,652	43,066	14,658	27,070	15,998
12	San Luis Valley Rural Electric Cooperative, Inc.	221,193	22,120	7,243	7,927	14,193
13	San Miguel Power Association, Inc.	208,259	20,826	1,364	3,864	16,962
14	Sangre De Cristo Electric Association, Inc.	125,738	12,574	8,076	9,292	3,282
15	Southeast Colorado Power Association	240,197	24,020	6,562	6,796	17,224
16	United Power, Inc.	2,902,460	580,492	174,385	202,297	378,195
17	White River Electric Association, Inc.	602,760	60,276	4,971	5,103	55,173
18	Y-W Electric Association, Inc.	372,648	37,265	-	-	37,265
19	Total Colorado	10,291,145	1,319,368	342,666	429,394	889,973

Tri-State Renewable Retirements (CO RES)	Additional Resources Used for 2021 Retirements (MWh)	Resource Multiplier	Additional Resources Used for 2021 Retirements w/ Multiplier (RECs)	Percent of Total Remaining Requirement	Resource Vintage
20 Additional Retail DG RECs	11,126	various	11,598	1.30%	2017/2021
21 Additional Wholesale DG RECS	10,360	various	10,360	1.16%	2021
22 WAPA Small Hydro, < 30MW - CRSP, CO	24,383	1.25	30,479	3.42%	2016
23 WAPA Small Hydro, < 30MW - LAP, CO	522,720	1.25	653,400	73.42%	2016
24 WAPA Small Hydro, < 30MW - LAP, CO	147,309	1.25	184,136	20.69%	2017
25 Total	715,897		889,973	100.00%	

Important Notes:

- Resources include supplies from 2017 and 2021 for members, if available, and are also inclusive of member generated DG requirement supplies
- Member Retail DG summary can be viewed on pages 2 and 3 and the Wholesale DG summary is included on pages 4 and 5
- 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.
- 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.
- Remaining 2021 Requirement is rounded to nearest whole number
- United Power is subject to 20% under CO RES standards due to total meters greater than 100,000

Tri-State Generation and Transmission Association, Inc.
Colorado 2021 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2021 Retail DG Requirement Calculation										
Line No.	(a) Colorado Members	(b)		(c)		(d)		(e)		(g) 2021 Retail DG Requirement (MWh)
		2021 Form 7 Colorado Electric Sales (MWh)	2021 Form 7 Total Colorado Electric Sales (MWh)	2021 Form 7 Industrial Electric Sales (MWh) ¹	2021 Retail Electric Sales (MWh)	2021 Form 7 Total Meters	2021 Retail DG Requirement (%)			
1	Empire Electric Association, Inc.	501,692	354,838		146,854	16,651		0.500%	734	
2	Gunnison County Electric Association, Inc.	123,909	7,347		116,562	11,353		0.500%	583	
3	High West Energy	111,332	37,646		73,686	2,175		0.375%	276	
4	Highline Electric Association	347,103	55,047		292,056	8,597		0.375%	1,095	
5	K.C. Electric Association	222,430	-		222,430	6,816		0.375%	834	
6	La Plata Electric Association, Inc.	898,579	326,969		571,610	45,482		0.500%	2,858	
7	Morgan County Rural Electric Association	379,745	70,059		309,686	9,089		0.375%	1,161	
8	Mountain Parks Electric, Inc.	314,453	27,549		286,904	21,623		0.500%	1,435	
9	Mountain View Electric Association, Inc.	927,441	66,984		860,457	59,406		0.500%	4,302	
10	Poudre Valley Rural Electric Association, Inc.	1,360,556	503,167		857,389	49,040		0.500%	4,287	
11	San Isabel Electric Association, Inc.	430,652	157,729		272,923	25,434		0.500%	1,365	
12	San Luis Valley Rural Electric Cooperative, Inc.	221,193	2,561		218,632	12,980		0.500%	1,093	
13	San Miguel Power Association, Inc.	208,259	-		208,259	14,221		0.500%	1,041	
14	Sangre De Cristo Electric Association, Inc.	125,738	5,622		120,116	13,539		0.500%	601	
15	Southeast Colorado Power Association	240,197	39,459		200,738	10,702		0.500%	1,004	
16	United Power, Inc.	2,902,460	1,356,390		1,546,070	102,305		0.500%	7,730	
17	White River Electric Association, Inc.	602,760	549,322		53,438	3,444		0.375%	200	
18	Y-W Electric Association, Inc.	372,648	67,926		304,722	8,848		0.375%	1,143	
19	Total Colorado	10,291,145	3,628,616		6,662,530				31,743	

Tri-State Generation and Transmission Association, Inc.
Colorado 2021 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2021 Retail DG Retirement Summary						
(a)	(b)	(c)	(d)	(f)		
Line No.	Colorado Members	2021 Retail DG Requirement (MWh)	Member Retail DG Supply W/out Multiplier (MWh) ²	Member Retail DG Supply Including Multiplier (RECs)	Net 2021 Retail DG Requirement Remaining (RECs) ³	
1	Empire Electric Association, Inc.	734	265	734	-	
2	Gunnison County Electric Association, Inc.	583	14	35	547	
3	High West Energy	276	-	-	276	
4	Highline Electric Association	1,095	171	277	819	
5	K.C. Electric Association	834	-	-	834	
6	La Plata Electric Association, Inc.	2,858	1,207	2,858	-	
7	Morgan County Rural Electric Association	1,161	145	343	818	
8	Mountain Parks Electric, Inc.	1,435	-	-	1,435	
9	Mountain View Electric Association, Inc.	4,302	-	-	4,302	
10	Poudre Valley Rural Electric Association, Inc.	4,287	1,959	4,287	-	
11	San Isabel Electric Association, Inc.	1,365	1,365	1,365	-	
12	San Luis Valley Rural Electric Cooperative, Inc.	1,093	-	-	1,093	
13	San Miguel Power Association, Inc.	1,041	347	1,041	-	
14	Sangre De Cristo Electric Association, Inc.	801	247	601	-	
15	Southeast Colorado Power Association	1,004	439	673	331	
16	United Power, Inc.	7,730	3,468	7,730	-	
17	White River Electric Association, Inc.	200	133	200	-	
18	Y-W Electric Association, Inc.	1,143	-	-	1,143	
19	Total Colorado	31,743	9,760	20,143	11,598	

Additional Retail			
Additional Retail DG Supply W/out Multiplier		Additional Retail DG Supply Including Multiplier	
Tri-State Renewable Retirements (CO RES)	Multipler	Multipler	Vintage
20 Additional Qualifying P117 Resources	11,126	11,598	2017/2021
21 Total Additional Retail DG Retirements	11,126	11,598	

Important Notes:

- 1) Deducted only line 5 of F7 part R/O which designates Large Industrial above 1000kW
- 2) Includes 2017 and 2021 vintage
- 3) Remaining 2021 Requirement is rounded to nearest whole number

Tri-State Generation and Transmission Association, Inc.
Colorado 2021 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2021 Distributed Generation (DG) Requirement Calculation									
(a)	(b)	(c)	(d)	(e)	(f)	(g)			
Line No.	Colorado Members	2021 Form 7 Total Colorado Electric Sales (MWh)	2021 Form 7 Total Meters	2021 DG Requirement (%)	2021 DG Requirement (MWh)	Less: 2021 Retail DG Requirement (MWh)	Net 2021 DG Requirement Remaining (MWh)		
1	Empire Electric Association, Inc.	501,692	16,651	1.000%	5,017	734	4,283		
2	Gunnison County Electric Association, Inc.	123,909	11,353	1.000%	1,239	583	656		
3	High West Energy	111,332	2,175	0.750%	835	278	559		
4	Highline Electric Association	347,103	8,597	0.750%	2,603	1,095	1,508		
5	K.C. Electric Association	222,430	6,616	0.750%	1,668	834	834		
6	La Plata Electric Association, Inc.	888,579	45,482	1.000%	8,886	2,858	6,128		
7	Morgan County Rural Electric Association	379,745	9,089	0.750%	2,848	1,161	1,687		
8	Mountain Parks Electric, Inc.	314,453	21,823	1.000%	3,145	1,435	1,710		
9	Mountain View Electric Association, Inc.	927,441	59,408	1.000%	9,274	4,302	4,972		
10	Poudre Valley Rural Electric Association, Inc.	1,360,556	49,040	1.000%	13,606	4,287	9,319		
11	San Isabel Electric Association, Inc.	430,652	25,434	1.000%	4,307	1,365	2,942		
12	San Luis Valley Rural Electric Cooperative, Inc.	221,193	12,980	1.000%	2,212	1,093	1,119		
13	San Miguel Power Association, Inc.	208,259	14,221	1.000%	2,083	1,041	1,041		
14	Sangre De Cristo Electric Association, Inc.	125,738	13,539	1.000%	1,257	601	657		
15	Southeast Colorado Power Association	240,197	10,702	1.000%	2,402	1,004	1,398		
16	United Power, Inc.	2,902,460	102,305	1.000%	29,025	7,730	21,294		
17	White River Electric Association, Inc.	602,760	3,444	0.750%	4,521	200	4,320		
18	Y-W Electric Association, Inc.	372,648	8,848	0.750%	2,795	1,143	1,652		
19	Total Colorado	10,291,145	8,848		97,821	31,743	66,079		

Tri-State Generation and Transmission Association, Inc.
Colorado 2021 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2021 Distributed Generation (DG) Retirement Summary						
(a)	(b)	(c)	(d)	(f)		
Line No.	Colorado Members	2021 DG Requirement (MWh)	Member DG Supply W/out Multiplier (MWh) ¹	Member DG Supply Including Multiplier (RECs)	Net 2021 DG Requirement Remaining (RECs) ²	
1	Empire Electric Association, Inc.	4,283	2,987	4,283	-	656
2	Gunnison County Electric Association, Inc.	656	-	-	-	559
3	High West Energy	559	-	-	-	-
4	Highline Electric Association	1,508	1,508	1,508	-	834
5	K.C. Electric Association	834	-	-	-	-
6	La Plata Electric Association, Inc.	6,128	4,902	6,128	-	1,687
7	Morgan County Rural Electric Association	1,687	-	-	-	-
8	Mountain Parks Electric, Inc.	1,710	1,710	1,710	-	4,972
9	Mountain View Electric Association, Inc.	4,972	-	-	-	-
10	Poudre Valley Rural Electric Association, Inc.	9,319	7,455	9,319	-	-
11	San Isabel Electric Association, Inc.	2,942	1,471	2,942	-	-
12	San Luis Valley Rural Electric Cooperative, Inc.	1,119	560	1,119	-	-
13	San Miguel Power Association, Inc.	1,041	423	1,041	-	-
14	Sangre De Cristo Electric Association, Inc.	657	657	657	-	-
15	Southeast Colorado Power Association	1,398	1,398	1,398	-	-
16	United Power, Inc.	21,294	17,035	21,294	-	-
17	White River Electric Association, Inc.	4,320	4,320	4,320	-	-
18	Y-W Electric Association, Inc.	1,652	-	-	-	1,652
19	Total Colorado	66,079	44,407	55,719		10,360

Tri-State Renewable Retirements (RES)	(CO)	Additional DG Supply W/out Multiplier	Additional DG Supply Including Multiplier	Vintage
20 Additional Qualifying P117 Resources		10,360	10,360	2021
21 Total Additional Retail DG Retirements		10,360	10,360	

Important Notes:

1) 2021 Vintage RECS

2) Remaining 2021 Requirement is rounded to nearest whole number

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