

June 1, 2023

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



Your Touchstone Energy® Cooperative 

Subject: 2022 Renewable Energy Standard (RES) / Docket No. 23M-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 2022 RES requirement as outlined in Rule 3662.

Based on our 2022 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	598,728	226,031	372,697
Retail Dist. Generation	7,838	7,838	0
Wholesale Dist. Generation	22,098	22,098	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
SVP & 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

May 16th, 2023

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

Subject: 2022 Renewable Energy Standard (RES) / Docket No. 23M-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 2022.

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, 2023, for the prior compliance year (Rule 3662(a)).

In 2022, 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	598,728	226,031	372,697
Retail Distributed Generation	7,838	7,838	0
Wholesale Distributed Generation	22,098	22,098	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 2022 RES requirement.

Sincerely,

Duane Highley
Duane Highley (May 17, 2023 15:47 EDT)

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.

Tri-State Generation and Transmission Association, Inc.
Colorado 2022 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

Line No.	Colorado Members	2022 Form 7 Colorado Total Retail Electric Sales (MWh)	2022 Colorado RES Requirement at 10% Percent (MWh)	Member Self- Generated Renewable Supplies Before Multiplier ¹ (MWh)	Less: Member Self- Generated Renewable Supplies With Multiplier ¹ (RECs)	Net 2022 (Rounded) Colorado RES Requirement (MWh)
	(a)	(b)	(c)	(d)	(e)	(f)
1	Empire Electric Association, Inc.	599,960	59,996	4,884	6,486	53,510
2	Gunnison County Electric Association, Inc.	128,607	12,861	34	75	12,786
3	High West Energy	129,471	12,948	-	-	12,948
4	Highline Electric Association	399,639	39,964	4,587	5,236	34,728
5	K.C. Electric Association	241,311	24,132	-	-	24,132
6	La Plata Electric Association, Inc.	940,580	94,058	59,841	82,246	11,812
7	Morgan County Rural Electric Association	382,376	38,238	909	1,374	36,864
8	Mountain Parks Electric, Inc.	343,849	34,385	9,636	9,636	24,749
9	Mountain View Electric Association, Inc.	944,612	94,462	-	-	94,462
10	Poudre Valley Rural Electric Association, Inc.	1,414,941	141,495	59,134	66,704	74,791
11	San Isabel Electric Association, Inc.	421,310	42,132	14,864	26,962	15,170
12	San Luis Valley Rural Electric Cooperative, Inc.	219,460	21,946	-	-	21,946
13	San Miguel Power Association, Inc.	209,806	20,981	2,302	6,907	14,074
14	Sangre De Cristo Electric Association, Inc.	129,252	12,926	10,064	12,926	-
15	Southeast Colorado Power Association	267,919	26,792	12,508	12,985	13,807
16	United Power, Inc.	2,993,636	598,728	203,377	226,031	372,697
17	White River Electric Association, Inc.	568,510	56,852	5,575	5,765	51,087
18	Y-W Electric Association, Inc.	400,524	40,053	-	-	40,053
19	Total Colorado	10,735,763	1,372,949	387,516	463,332	909,616

Tri-State Renewable Retirements (CO RES)	Additional Resources Used for 2022	Retirements (MWh)	Resource Multiplier	Additional Resources Used for 2022 Retirements w/ Multiplier (RECs)	Percent of Total Remaining Requirement	Resource Vintage
20 Additional Retail DG RECS	9,259	various	various	10,492	1.15%	2018/2022
21 Additional Wholesale DG RECS	11,904	various	various	11,904	1.31%	2022
22 WAPA Small Hydro, < 30MW - CRSP	35,778	1.25	1.25	44,723	4.92%	2018
23 WAPA Small Hydro, < 30MW - LAP	530,068	1.25	1.25	662,585	72.84%	2018
24 WAPA Small Hydro, < 30MW - LAP	143,930	1.25	1.25	179,913	19.78%	2019
25 Total	730,939			909,616	100.00%	

Important Notes:

- Resources include supplies from 2018 and 2022 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 2022 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 2022 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2022 Retail DG Requirement Calculation									
(a)		(b)	(c)	(d)	(e)	(f)	(g)		
Colorado Members		2022 Form 7 Total Colorado Electric Sales (MWh)	2022 Form 7 Total Industrial Electric Sales (MWh) ¹	2022 Retail Electric Sales (MWh)	2022 Form 7 Total Meters	2022 Retail DG Requirement (%)	2022 Retail DG Requirement (MWh)		
Line No.									
1	Empire Electric Association, Inc.	599,960	447,726	152,234	16,858	0.500%	761		
2	Gunnsison County Electric Association, Inc.	128,607	7,995	120,612	11,496	0.500%	603		
3	High West Energy	129,471	58,741	70,730	3,681	0.375%	265		
4	Highline Electric Association	399,639	55,746	343,893	8,586	0.375%	1,290		
5	K.C. Electric Association	241,311	4,654	236,658	6,614	0.375%	887		
6	La Plata Electric Association, Inc.	940,580	363,248	577,332	46,028	0.500%	2,887		
7	Morgan County Rural Electric Association	382,376	45,003	337,373	9,265	0.375%	1,265		
8	Mountain Parks Electric, Inc.	343,849	34,079	309,769	22,069	0.500%	1,549		
9	Mountain View Electric Association, Inc.	944,612	76,235	868,378	61,518	0.500%	4,342		
10	Poudre Valley Rural Electric Association, Inc.	1,414,941	505,672	909,269	51,257	0.500%	4,546		
11	San Isabel Electric Association, Inc.	421,310	146,520	274,790	25,707	0.500%	1,374		
12	San Luis Valley Rural Electric Cooperative, Inc.	219,460	2,804	216,655	13,066	0.500%	1,083		
13	San Miguel Power Association, Inc.	209,806	-	209,806	14,466	0.500%	1,049		
14	Sangre De Cristo Electric Association, Inc.	129,252	5,362	123,890	14,042	0.500%	619		
15	Southeast Colorado Power Association	287,919	56,835	211,084	10,789	0.500%	1,055		
16	United Power, Inc.	2,993,636	1,426,019	1,567,618	106,943	0.500%	7,838		
17	White River Electric Association, Inc.	568,510	515,386	53,124	3,469	0.375%	199		
18	Y-W Electric Association, Inc.	400,524	72,690	327,834	8,843	0.375%	1,229		
19	Total Colorado	10,735,763	3,824,713	6,911,050			32,843		

Tri-State Generation and Transmission Association, Inc.
Colorado 2022 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2022 Retail DG Retirement Summary						
(a)	(b)	(c)	(d)	(f)		
Line No	Colorado Members	2022 Retail DG Requirement (MWh)	Member Retail DG Supply W/out Multiplier (MWh) ²	Member Retail DG Supply Including Multiplier (RECs)	Net 2022 Retail DG Requirement Remaining (RECs) ³	
1	Empire Electric Association, Inc.	761	761	761	-	
2	Gunnison County Electric Association, Inc.	603	34	75	528	
3	High West Energy	265	-	-	265	
4	Highline Electric Association	1,290	601	680	609	
5	K.C. Electric Association	887	-	-	887	
6	La Plata Electric Association, Inc.	2,887	2,887	2,887	-	
7	Morgan County Rural Electric Association	1,265	801	1,265	-	
8	Mountain Parks Electric, Inc.	1,549	-	-	1,549	
9	Mountain View Electric Association, Inc.	4,342	-	-	4,342	
10	Poudre Valley Rural Electric Association, Inc.	4,546	4,301	4,546	-	
11	Poudre Valley Rural Electric Association, Inc.	1,374	1,374	1,374	-	
12	San Isabel Electric Association, Inc.	1,083	-	-	1,083	
13	San Miguel Power Association, Inc.	1,049	350	1,049	-	
14	Sangre De Cristo Electric Association, Inc.	619	619	619	-	
15	Southeast Colorado Power Association	1,055	742	1,055	-	
16	United Power, Inc.	7,838	7,838	7,838	-	
17	White River Electric Association, Inc.	199	133	199	-	
18	Y-W Electric Association, Inc.	1,229	-	-	1,229	
19	Total Colorado	32,843	20,440	22,349	10,492	

Tri-State Renewable Retirements (CO RES)			
Additional Retail DG Supply W/out Multiplier		Additional Retail DG Supply Including Multiplier	
20		2018/2022	
Additional Qualifying P117 Resources		9,259	10,492
21 Total Additional Retail DG Retirements		9,259	10,492

Important Notes:

- 1) Deducted only line 5 of F7 part R/O which designates Large Industrial above 1000kW
- 2) Includes 2018 and 2022 vintage
- 3) Remaining 2022 Requirement is rounded to nearest whole number

Tri-State Generation and Transmission Association, Inc.
Colorado 2022 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2022 Distributed Generation (DG) Requirement Calculation									
(a)	(b)	(c)	(d)	(e)	(f)	(g)			
Line No.	Colorado Members	2022 Form 7 Total Colorado Electric Sales (MWh)	2022 Form 7 Total Meters	2022 DG Requirement (%)	2022 DG Requirement (MWh)	Less: 2022 Retail DG Requirement (MWh)	Net 2022 DG Requirement Remaining (MWh)		
1	Empire Electric Association, Inc.	599,960	16,858	1.000%	6,000	761	5,238		
2	Gunnison County Electric Association, Inc.	128,607	11,496	1.000%	1,286	603	683		
3	High West Energy	129,471	3,681	0.750%	971	265	706		
4	Highline Electric Association	399,639	8,586	0.750%	2,997	1,290	1,708		
5	K.C. Electric Association	241,311	6,614	0.750%	1,810	887	922		
6	La Plata Electric Association, Inc.	940,580	46,028	1.000%	9,406	2,887	6,519		
7	Morgan County Rural Electric Association	382,376	9,265	0.750%	2,868	1,265	1,603		
8	Mountain Parks Electric, Inc.	343,849	22,069	1.000%	3,438	1,549	1,890		
9	Mountain View Electric Association, Inc.	944,612	61,518	1.000%	9,446	4,342	5,104		
10	Poudre Valley Rural Electric Association, Inc.	1,414,941	51,257	1.000%	14,149	4,546	9,603		
11	San Isabel Electric Association, Inc.	421,310	25,707	1.000%	4,213	1,374	2,839		
12	San Luis Valley Rural Electric Cooperative, Inc.	219,460	13,066	1.000%	2,195	1,083	1,111		
13	San Miguel Power Association, Inc.	209,806	14,466	1.000%	2,098	1,049	1,049		
14	Sangre De Cristo Electric Association, Inc.	129,252	14,042	1.000%	1,293	619	673		
15	Southeast Colorado Power Association	267,919	10,789	1.000%	2,679	1,055	1,624		
16	United Power, Inc.	2,993,636	106,943	1.000%	29,936	7,838	22,098		
17	White River Electric Association, Inc.	588,510	3,469	0.750%	4,264	199	4,065		
18	Y-W Electric Association, Inc.	400,524	8,843	0.750%	3,004	1,229	1,775		
19	Total Colorado	10,735,763			102,053	32,843	69,210		

Tri-State Generation and Transmission Association, Inc.
Colorado 2022 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2022 Distributed Generation (DG) Retirement Summary						
(a)	(b)	(c)	(d)	(f)		
Line No.	Colorado Members	2022 DG Requirement (MWh)	Member DG Supply W/out Multiplier (MWh) ¹	Member DG Supply Including Multiplier (RECs)	Net 2022 DG Requirement Remaining (RECs) ²	
1	Empire Electric Association, Inc.	5,238	3,436	5,238	-	
2	Gunnison County Electric Association, Inc.	683	-	-	683	
3	High West Energy	706	-	-	706	
4	Highline Electric Association	1,708	1,708	1,708	-	
5	K.C. Electric Association	922	-	-	922	
6	La Plata Electric Association, Inc.	6,519	5,215	6,519	-	
7	Morgan County Rural Electric Association	1,603	-	-	1,603	
8	Mountain Parks Electric, Inc.	1,890	1,890	1,890	-	
9	Mountain View Electric Association, Inc.	5,104	-	-	5,104	
10	Poudre Valley Rural Electric Association, Inc.	9,603	9,603	9,603	-	
11	San Isabel Electric Association, Inc.	2,839	1,420	2,839	-	
12	San Luis Valley Rural Electric Cooperative, Inc.	1,111	-	-	1,111	
13	San Miguel Power Association, Inc.	1,049	350	1,049	-	
14	Sangre De Cristo Electric Association, Inc.	673	673	673	-	
15	Southeast Colorado Power Association	1,624	1,624	1,624	-	
16	United Power, Inc.	22,098	18,759	22,098	-	
17	White River Electric Association, Inc.	4,065	4,065	4,065	-	
18	Y-W Electric Association, Inc.	1,775	-	-	1,775	
19	Total Colorado	69,210	48,742	57,307	11,904	

Tri-State Renewable Retirements (RES)		(CO)	Additional DG Supply W/out Multiplier	Additional DG Supply Including Multiplier	Vintage
20	Additional Qualifying P117 Resources		11,904	11,904	2022
21	Total Additional Retail DG Retirements		11,904	11,904	

Important Notes:

1) 2022 Vintage RECs

2) Remaining 2022 Requirement is rounded to nearest whole number