

June 1, 2024

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



Subject: 2023 Renewable Energy Standard (RES) / Docket No. 24M-0014E

Dear Ms. White:

In compliance with the passage of the Colorado Renewable Energy Standard (RES), this letter serves as United Power, Inc.' report of meeting its 2023 RES requirement as outlined in Rule 3662.

Based on our 2023 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	642,692	223,667	419,025
Retail Dist. Generation	8,937	8,901	36
Wholesale Dist. Generation	23,197	23,197	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
Senior Vice President & 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.



MEMORANDUM

TO: Colorado Member CEOs
High West Energy, Inc. CEO

FROM: Duane Highley 
Chief Executive Officer

DATE: May 23, 2024

SUBJECT: **2023 Colorado Renewable Energy Standard (RES) Docket No. 24M-0014E**

Enclosed you will find information that is necessary documentation for your cooperative's compliance obligation with the Colorado Renewable Energy Standard (RES) for 2023.

The following information needs to be submitted with your compliance report to the Colorado Public Utilities Commission (PUC), which is due June 1st, 2024.

- A letter from me that lays out your cooperative's compliance obligation and the number of RECs (Renewable Energy Credits) that have been retired by Tri-State on your cooperative's behalf.
- A spreadsheet that lists the RECs that have been retired on behalf of all Tri-State Colorado Member Systems and High West Energy, and the renewable sources that produced the RECs.
- A sample letter for sending your compliance packet/documentation to the PUC.
 - **Please note the PUC sample letters subject line referencing Docket No. 24M-0014E. This docket number is needed for your filing with the Colorado PUC.**

If you have any questions, please contact Catherine Crowfoot 303-254-3786 or catherine.crowfoot@tristategt.org.



May 23, 2024

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

Subject: 2023 Renewable Energy Standard (RES) / Docket No. 24M-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 2023.

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, 2024, for the prior compliance year (Rule 3662(a)).

In 2023, 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	642,692	223,667	419,025
Retail Distributed Generation	8,937	8,901	36
Wholesale Distributed Generation	23,197	23,197	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 2023 RES requirement.

Sincerely,

DocuSigned by:

Duane Highley
53B2DCB5AD1410
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 2023 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

Line No.	Colorado Members	2023 Form 7 Colorado Total Retail Electric Sales (MWh) (b)	2023 Colorado RES Requirement at 10% 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 2023 (Rounded) Colorado RES Requirement (MWh) (f)
19	Total Colorado	10,727,397	1,394,092	388,525	464,755	929,338
	Tri-State Renewable Retirements (CO RES)	Additional Resources Used for 2023 Retirements (MWh)	Resource Multiplier	Additional Resources Used for 2023 Retirements w/ Multiplier (RECs)	Percent of Total Remaining Requirement	Resource Vintage
20	Additional Retail DG RECs	9,194	various	9,803	1.05%	2019
21	Additional Wholesale DG RECS	11,660	various	11,660	1.25%	2023
22	WAPA Small Hydro, < 30MW - CRSP	47,658	1.25	59,573	6.41%	2019
23	WAPA Small Hydro, < 30MW - LAP	448,561	1.25	560,701	60.33%	2019
24	WAPA Small Hydro, < 30MW - LAP	230,081	1.25	287,601	30.95%	2020
25	Total	747,155		929,338	100.00%	

Important Notes:

1) Resources include supplies from 2019 and 2023 for members, if available, and are also inclusive of member generated DG requirement supplies

2) Member Retail DG summary can be viewed on pages 2 and 3 and the Wholesale DG summary is included on pages 4 and 5

3) 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.

4) 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.

5) Remaining 2023 Requirement is rounded to nearest whole number

6) 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 2023 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2023 Retail DG Requirement Calculation						
	(a)	(b)	(c)	(d)	(e)	(f)
Line No.	Colorado Members	2023 Form 7 Total Colorado Electric Sales (MWh)	2023 Form 7 Total Industrial Electric Sales (MWh) ¹	2023 Retail Electric Sales (MWh)	2023 Form 7 Total Meters	2023 Retail DG Requirement (%)
19	Total Colorado	10,727,397	3,840,414	6,886,983		33,445

2023 Retail DG Retirement Summary				
	(a)	(b)	(c)	(d)
Line No.	Colorado Members	2023 Retail DG Requirement (MWh)	Member Retail DG Supply W/out Multiplier (MWh) ²	Member Retail DG Supply Including Multiplier (RECs)
19	Total Colorado	33,445	17,271	23,642

	Tri-State Renewable Retirements (CO RES)	Additional Retail DG Supply W/out Multiplier	Additional Retail DG Supply Including Multiplier	Vintage
20	Additional Qualifying P117 Resources	9,194	9,803	2019/2023
21	Total Additional Retail DG Retirements	9,194	9,803	

Important Notes:

- 1) Deducted only line 5 of F7 part R/O which designates Large Industrial above 1000kV
- 2) Includes 2019 and 2023 vintage
- 3) Remaining 2023 Requirement is rounded to nearest whole number

Tri-State Generation and Transmission Association, Inc.
Colorado 2023 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2023 Distributed Generation (DG) Requirement Calculation						
	(a)	(b)	(c)	(d)	(e)	(f)
Line No.	Colorado Members	2023 Form 7 Total Colorado Electric Sales (MWh)	2023 Form 7 Total Meters	2023 DG Requirement (%)	2023 DG Requirement (MWh)	Less: 2023 Retail DG Requirement (MWh)
19	Total Colorado	10,727,397			103,517	33,445
						Net 2023 DG Requirement Remaining (MWh)
						70,073

2023 Distributed Generation (DG) Retirement Summary				
	(a)	(b)	(c)	(d)
Line No.	Colorado Members	2023 DG Requirement (MWh)	Member DG Supply W/out Multiplier (MWh) ¹	Member DG Supply Including Multiplier (RECs)
19	Total Colorado	70,073	48,464	58,413
				Net 2023 DG Requirement Remaining (RECs) ²
				11,660

	Tri-State Renewable Retirements (RES)	(CO)	Additional DG Supply W/out Multiplier	Additional DG Supply Including Multiplier	Vintage
20	Additional Qualifying P117 Resources		11,660	11,660	2023
21	Total Additional Retail DG Retirements		11,660	11,660	

Important Notes:

1) 2023 Vintage RECS

2) Remaining 2023 Requirement is rounded to nearest whole number