



Your Touchstone Energy® Cooperative 

May 29, 2025

Ms. Rebecca E White, Director
Colorado Public Utilities Commission
1560 Broadway, 2nd Floor suite 250
Denver, CO 80202

RE: 2024 Renewable Energy Standard (RES) / Docket No. 25M-0014E

Ms. White:

Pursuant to 4 CCR 723-3-3662(f), this letter serves as United Power, Inc.'s ("United Power"), a Qualifying Wholesale Utility, 2024 Renewable Energy Standard Annual Compliance Report ("2024 RES Report") to the Colorado Public Utilities Commission ("Commission").

A copy of United Power's prior RES Reports can be found on United Power's website at: www.unitedpower.com/reports.

Background

Senate Bill 13-252 ("SB-252") was signed into law on June 5, 2013, and codified at § 40-2- 124, C.R.S.; among other modifications, SB-252 established a 20% Renewable Energy Standard ("RES") for Qualifying Wholesale Utilities beginning in the year 2020 and continuing thereafter. The Commission adopted new rules implementing SB13-252 in Proceeding No. 13R-0901E specific to Qualifying Wholesale Utilities to existing Rule 3662, which defines the requirements for Annual Compliance Reports.

Prior to 2020, United Power had no direct requirement to comply with the bill and reported solely to its regulatory body, its Board of Directors, on such matters. United Power has filed past Annual Compliance Reports with the Commission for transparency, but under no obligation to meet requirements of the bill. United Power's prior Annual Compliance Reports were primarily prepared by Tri-State Generation and Transmission Association, Inc. ("Tri-State"), United Power's sole transmission and service provider until May 1, 2024.

Colorado PUC E-Filings System

Annual reporting Requirements for Qualifying Wholesale Utilities (Rule 3662(f)(I) through (III))

- (I) Describe the steps it took during the most recently complete compliance year to comply with the renewable energy standard of 20% of retail sales by 2020 as established in § 40-2-124(8) C.R.S.**

United Power has not submitted an Electric Resource Plan (“ERP”). United Power plans to comply by submitting an ERP for the Commission concurrence in 2026.

- (II) For Compliance years before 2020, describe whether it is making sufficient progress towards meeting the standard in 2020 or is likely to meet the 2020 standard early.**

United Power was previously included in Tri-State’s annual compliance filings and refers the Commission to those filings.

- (III) For the 2020 compliance year and each compliance year thereafter, describe whether it has achieved compliance with the RES and whether it anticipates continuing to do so.**

United Power submits this 2024 RES Report as compliance for calendar year 2024. The information in the table below represents compliance with the following provision of the law:

The RES established in §40-2-124(8)(b), C.R.S. states, “Notwithstanding any other provision of law, each qualifying wholesale utility shall generate, or cause to be generated, at least twenty percent of the energy it provides to its Colorado members at wholesale from eligible energy resources in the year 2020 and thereafter.” In 2024, United Power provided 3,454,494 MWh of wholesale energy to delivery points in Colorado for its members. Twenty percent of this amount equates to 690,898 MWh or RECs from eligible energy resources required for compliance in the year 2024.

Section 40-2-124(8)(c) further states, “A qualifying wholesale utility may count the energy generated or caused to be generated from eligible energy resources by its Colorado members or by the qualifying wholesale utility on behalf of its Colorado members pursuant to subparagraph (V) of paragraph (c) of subsection (1) ((1)((c)(V))) of this section toward compliance with the energy resource standard established in this subsection (8).” For 2024, 361,463 RECs will be retired on behalf of Colorado members for compliance with the RES. Thus 329,436 additional RECs will be to meet the RES for United Power as a Qualifying Wholesale Utility to achieve the 20% compliance level.

The following table details the sources, vintages, multipliers, and quantities of RECs to be retired for United Power’s compliance obligation.

The table below represents RECs to be retired in association with this filing.

Source of RECs	REC Multiplier	# of RECs	Vintage
Hanger 160	1	3,276 RECs	2023-24
Maverick Solar	1	15,325 RECs	2024
Platte I Solar	1	34,773 RECs	2024
Platte II Solar	1	15,357 RECs	2024
Jenkins Solar	1	30,922 RECs	2024
Timberline (Erie landfill)	1	18,543 RECs	2024
Alamosa Solar	1	20,593 RECs	2024
Overland Solar	1	703 RECs	2024
Guzman Renewables	1	129,742 RECs	2020-24
Tri-State Renewable purchase	1	92,108 RECs	2020-24
(Purchase)	1	212,660 RECs	2020-24
Rooftop	1	116,897 RECs	2024
Total		690,899 RECs	

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

Sincerely,

Jonathan Aust
Vice President of Energy Resource Planning
United Power, Inc.