

June 1, 2021

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



Subject: 2020 Renewable Energy Standard (RES) / Docket No. 21M-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 2020 RES requirement as outlined in Rule 3662.

Based on our 2020 retail sales, United Power, Inc's compliance obligation of 10% 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	287,168	171,708	115,460
Retail Dist. Generation	7,417	7,417	0
Wholesale Dist. Generation	21,300	21,300	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

May 5, 2021

Mark Gabriel
United Power, Inc.
PO Box 929
Brighton, CO 80601

Subject: 2020 Renewable Energy Standard (RES) / Docket No. 21M-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 2020.

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

In 2020, your compliance obligation is equal to 10% of your energy requirements, and includes a distributed generation (DG) component. The DG requirement is one-tenth (10%) of the total 10% 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	287,168	171,708	115,460
Retail Distributed Generation	7,417	7,417	0
Wholesale Distributed Generation	21,300	21,300	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 2020 RES requirement.

Sincerely,


Duane D. Highley (May 5, 2021 3:04 PM)

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 2020 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

Line No.	Colorado Members	2020 Form 7 Colorado Total Retail Electric Sales (MWh)	2020 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 2020 (Rounded) Colorado RES Requirement (MWh)
	(a)	(b)	(c)	(d)	(e)	(f)
1	Empire Electric Association, Inc.	575,886	57,589	3,535	7,886	49,703
2	Gunnison County Electric Association, Inc.	122,136	12,214	12	33	12,181
3	High West Energy	114,322	11,433	-	-	11,433
4	Highline Electric Association	378,889	37,889	12,032	14,235	23,654
5	K.C. Electric Association	226,164	22,617	-	-	22,617
6	La Plata Electric Association, Inc.	907,682	90,769	51,961	74,220	16,549
7	Morgan County Rural Electric Association	372,905	37,291	139	337	36,954
8	Mountain Parks Electric, Inc.	295,341	29,535	7,561	7,561	21,974
9	Mountain View Electric Association, Inc.	911,481	91,149	-	-	91,149
10	Poudre Valley Rural Electric Association, Inc.	1,344,270	134,427	47,882	57,361	77,066
11	San Isabel Electric Association, Inc.	424,986	42,499	12,750	25,499	17,000
12	San Luis Valley Rural Electric Cooperative, Inc.	229,733	22,974	1,157	2,314	20,660
13	San Miguel Power Association, Inc.	197,786	19,779	5,617	10,731	9,048
14	Sangre De Cristo Electric Association, Inc.	121,795	12,180	7,795	11,018	1,162
15	Southeast Colorado Power Association	237,674	23,768	10,461	10,743	13,025
16	United Power, Inc.	2,871,674	287,168	142,788	171,708	115,460
17	White River Electric Association, Inc.	763,847	76,385	10,054	10,054	66,331
18	Y-W Electric Association, Inc.	347,486	34,749	-	-	34,749
19	Total Colorado	10,444,056	1,044,415	313,744	403,700	640,715

Tri-State Renewable Retirements (CO RES)	Additional Resources Used for 2020	Retirements (MWh)	Resource Multiplier	Additional Resources Used for 2020 Retirements w/ Multiplier (RECs)	Percent of Total Remaining Requirement	Resource Vintage
20	Additional Retail DG RECs	10,679	various	13,064	2.04%	2016/2020
21	Additional Wholesale DG RECS	9,675	various	13,652	2.13%	2020
22	Kit Carson Windpower, LLC	89,509	1.25	111,886	17.46%	2015
23	Colorado Highlands	251,389	1.25	314,236	49.04%	2015
24	Colorado Highlands -Phase II	89,034	1.25	111,293	17.37%	2015
25	WAPA Small Hydro, < 30MW - LAP, CO	76,584	1.00	76,584	11.95%	2015
26	Total	526,870		640,715	100.00%	

Important Notes:

- Resources include supplies from 2016 and 2020 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 2020 Requirement is rounded to nearest whole number

Tri-State Generation and Transmission Association, Inc.
Colorado 2020 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2020 Retail DG Requirement Calculation									
(a)	(b)	(c)	(d)	(e)	(f)	(g)			
Line No.	Colorado Members	2020 Form 7 Total Colorado Electric Sales (MWh)	2020 Form 7 Total Industrial Electric Sales (MWh) ¹	2020 Retail Electric Sales (MWh)	2020 Form 7 Total Meters	2020 Retail DG Requirement (%)	2020 Retail DG Requirement (MWh)		
1	Empire Electric Association, Inc.	575,886	433,092	142,794	16,537	0.500%	714		
2	Gunnison County Electric Association, Inc.	122,136	7,415	114,722	11,205	0.500%	574		
3	High West Energy	114,322	20,490	93,832	1,344	0.375%	352		
4	Highline Electric Association	378,889	82,493	296,396	8,557	0.375%	1,111		
5	K.C. Electric Association	226,164	2,800	223,364	6,593	0.375%	838		
6	La Plata Electric Association, Inc.	907,682	343,229	564,453	44,832	0.500%	2,822		
7	Morgan County Rural Electric Association	372,905	81,735	291,170	8,875	0.375%	1,092		
8	Mountain Parks Electric, Inc.	295,341	25,710	269,631	21,101	0.500%	1,348		
9	Mountain View Electric Association, Inc.	911,481	61,026	850,455	57,448	0.500%	4,252		
10	Poudre Valley Rural Electric Association, Inc.	1,344,270	514,694	829,576	46,921	0.500%	4,148		
11	San Isabel Electric Association, Inc.	424,986	88,091	336,895	24,871	0.500%	1,684		
12	San Luis Valley Rural Electric Cooperative, Inc.	229,733	51,168	178,565	12,825	0.500%	893		
13	San Miguel Power Association, Inc.	197,786	85,147	112,639	14,015	0.500%	563		
14	Sangre De Cristo Electric Association, Inc.	121,795	5,878	115,917	13,100	0.500%	580		
15	Southeast Colorado Power Association	237,674	33,141	204,533	10,599	0.500%	1,023		
16	United Power, Inc.	2,871,674	1,388,335	1,483,339	97,704	0.500%	7,417		
17	White River Electric Association, Inc.	763,847	711,259	52,587	3,412	0.375%	197		
18	Y-W Electric Association, Inc.	347,486	37,879	309,607	8,787	0.375%	1,161		
19	Total Colorado	10,444,056	3,973,579	6,470,477			30,769		

Tri-State Generation and Transmission Association, Inc.
Colorado 2020 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2020 Retail DG Retirement Summary						
(a)	(b)	(c)	(d)	(f)		
Line No.	Colorado Members	2020 Retail DG Requirement (MWh)	Member Retail DG Supply W/out Multiplier (MWh) ²	Member Retail DG Supply Including Multiplier (RECs)	Net 2020 Retail DG Requirement Remaining (RECs) ³	
1	Empire Electric Association, Inc.	714	264	714	-	
2	Gunnison County Electric Association, Inc.	574	12	33	540	
3	High West Energy	352	-	-	352	
4	Highline Electric Association	1,111	104	205	907	
5	K.C. Electric Association	838	-	-	838	
6	La Plata Electric Association, Inc.	2,822	952	2,822	-	
7	Morgan County Rural Electric Association	1,092	139	337	755	
8	Mountain Parks Electric, Inc.	1,348	-	-	1,348	
9	Mountain View Electric Association, Inc.	4,252	-	-	4,252	
10	Poudre Valley Rural Electric Association, Inc.	4,148	1,950	4,148	-	
11	San Isabel Electric Association, Inc.	1,684	-	-	1,684	
12	San Luis Valley Rural Electric Cooperative, Inc.	893	-	-	893	
13	San Miguel Power Association, Inc.	563	188	563	-	
14	Sangre De Cristo Electric Association, Inc.	580	226	580	-	
15	Southeast Colorado Power Association	1,023	487	769	254	
16	United Power, Inc.	7,417	3,037	7,417	-	
17	White River Electric Association, Inc.	197	117	117	80	
18	Y-W Electric Association, Inc.	1,161	-	-	1,161	
19	Total Colorado	30,769	7,475	17,705	13,064	

				Additional Retail DG Supply Including Multiplier	Vintage
Tri-State Renewable Retirements (CO RES)					
20	Additional Qualifying P117 Resources	10,679	13,064		2016/2020
21	Total Additional Retail DG Retirements	10,679	13,064		

Important Notes:

- 1) Deducted only line 5 of F7 part R/D which designates Large Industrial above 1000kV
- 2) Includes 2016 and 2020 vintage
- 3) Remaining 2020 Requirement is rounded to nearest whole number

Tri-State Generation and Transmission Association, Inc.
Colorado 2020 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2020 Distributed Generation (DG) Requirement Calculation										
	(a)	(b)	(c)		(d)	(e)	(f)	(g)		
Line No.	Colorado Members	2020 Form 7 Total Colorado Electric Sales (MWh)	2020 Form 7 Total Meters	2020 DG Requirement (%)	2020 DG Requirement (MWh)	Less: 2020 Retail DG Requirement (MWh)	Net 2020 DG Requirement Remaining (MWh)			
1	Empire Electric Association, Inc.	575,886	16,537	1,000%	5,759	714	5,045			
2	Gunnison County Electric Association, Inc.	122,136	11,205	1,000%	1,221	574	648			
3	High West Energy	114,322	1,344	0.750%	857	352	506			
4	Highline Electric Association	378,889	8,557	0.750%	2,842	1,111	1,730			
5	K.C. Electric Association	226,164	6,593	0.750%	1,696	838	859			
6	La Plata Electric Association, Inc.	907,682	44,832	1,000%	9,077	2,822	6,255			
7	Morgan County Rural Electric Association	372,905	8,875	0.750%	2,797	1,092	1,705			
8	Mountain Parks Electric, Inc.	295,341	21,101	1,000%	2,953	1,348	1,605			
9	Mountain View Electric Association, Inc.	911,481	57,448	1,000%	9,115	4,252	4,863			
10	Poudre Valley Rural Electric Association, Inc.	1,344,270	46,921	1,000%	13,443	4,148	9,295			
11	San Isabel Electric Association, Inc.	424,986	24,871	1,000%	4,250	1,684	2,565			
12	San Luis Valley Rural Electric Cooperative, Inc.	229,733	12,825	1,000%	2,297	893	1,405			
13	San Miguel Power Association, Inc.	197,786	14,015	1,000%	1,978	563	1,415			
14	Sangre De Cristo Electric Association, Inc.	121,795	13,100	1,000%	1,218	580	638			
15	Southeast Colorado Power Association	237,674	10,599	1,000%	2,377	1,023	1,354			
16	United Power, Inc.	2,871,674	97,704	1,000%	28,717	7,417	21,300			
17	White River Electric Association, Inc.	763,847	3,412	0.750%	5,729	197	5,532			
18	Y-W Electric Association, Inc.	347,486	8,787	0.750%	2,606	1,161	1,445			
19	Total Colorado	10,444,056			98,932	30,769	68,163			

Tri-State Generation and Transmission Association, Inc.
Colorado 2020 Renewable Energy Standard (RES) Compliance Report
COMPLIANCE (MANDATORY) REQUIREMENTS

2020 Distributed Generation (DG) Retirement Summary						
(a)		(b)	(c)		(d)	(f)
Line No.	Colorado Members	2020 DG Requirement (MWh)	Member DG Supply W/out Multiplier (MWh) ¹	Member DG Supply Including Multiplier (RECs)	Net 2020 DG Requirement Remaining (RECs) ²	
1	Empire Electric Association, Inc.	5,045	803	1,419	3,626	
2	Gunnison County Electric Association, Inc.	648	-	-	648	
3	High West Energy	506	-	-	506	
4	Highline Electric Association	1,730	1,730	1,730	-	
5	K.C. Electric Association	859	-	-	859	
6	La Plata Electric Association, Inc.	6,255	5,004	6,255	-	
7	Morgan County Rural Electric Association	1,705	-	-	1,705	
8	Mountain Parks Electric, Inc.	1,605	1,605	1,605	-	
9	Mountain View Electric Association, Inc.	4,863	-	-	4,863	
10	Poudre Valley Rural Electric Association, Inc.	9,295	7,436	9,295	-	
11	San Isabel Electric Association, Inc.	2,565	1,283	2,565	-	
12	San Luis Valley Rural Electric Cooperative, Inc.	1,405	703	1,405	-	
13	San Miguel Power Association, Inc.	1,415	1,132	1,415	-	
14	Sangre De Cristo Electric Association, Inc.	638	638	638	-	
15	Southeast Colorado Power Association	1,354	1,354	1,354	-	
16	United Power, Inc.	21,300	17,040	21,300	-	
17	White River Electric Association, Inc.	5,532	5,532	5,532	-	
18	Y-W Electric Association, Inc.	1,445	-	-	1,445	
19	Total Colorado	68,163	44,259	54,514	13,652	

Tri-State Renewable Retirements (RES)		Additional DG Supply W/out Multiplier		Additional DG Supply Including Multiplier		Vintage	
20	Additional Qualifying P117 Resources	9,675	13,652	13,652	2020		
21	Total Additional Retail DG Retirements	9,675	13,652	13,652			

Important Notes:

1) 2020 Vintage RECS

2) Remaining 2020 Requirement is rounded to nearest whole number