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REFER TO FILE NO 109-29-18

May 5, 2005

E-61787 A-98-0465

Mr. Brian Bozzo, Compliance Section Manager
Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

**RE: NEC's Environmental Portfolio Standard Compliance Report
January 2004 through December 2004**

Dear Mr. Bozzo:

Pursuant to A.A.C. R14-2-1618 (D), enclosed is Navopache Electric Cooperative, Inc.'s ("NEC") Environmental Portfolio Standard ("EPS") Compliance Report covering the time period January 2004 through December 2004.

If you have any questions or concerns regarding the enclosed EPS Compliance Report, please contact me at 602-393-1700.

Very truly yours,

William P. Sullivan

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WPS/mw

Enclosure: NEC EPS Compliance Report (January 2004 – December 2004)

cc: Wayne A. Retzlaff, NEC (w/enclosure)
Paul O'Dair, NEC (w/enclosure)
Dennis Hughes, NEC (w/enclosure)
John Wallace, GCSECA (w/enclosure)

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Arizona Corporation Commission
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**NAVOPACHE ELECTRIC COOPERATIVE, INC.
EPS COMPLIANCE REPORT
JANUARY 2004 – DECEMBER 2004**

RETAIL SALES (kWh) THIS PERIOD	365,708,801
EPS REQUIREMENT THIS PERIOD	
EPS kWh Requirement (0.8% of Retail Sales)	2,925,670
Solar EPS kWh % Requirement (60%)	1,755,402
Non-Solar EPS kWh Requirement (40%)	1,170,268
RENEWABLE RESOURCE CREDITS GENERATED AND PURCHASED THIS PERIOD	
Solar Resource Credits Generated & Applied to EPS % Requirement (kWh)	337,605
Non-Solar Resource Credits Generated & Applied to EPS % Requirement (kWh)	-0-
Solar Resource Credits Purchased & Applied to EPS % Requirement (kWh)	-0-
Non-Solar Resource Credits Purchased & Applied to EPS % Requirement (kWh)	1,462,835
PREVIOUSLY BANKED RENEWABLE RESOURCE CREDITS APPLIED THIS PERIOD	
Previously Banked Solar Resource Credits Applied to EPS % Requirement (kWh)	-0-
Previously Banked Non-Solar Resource Credits Applied to EPS % Requirement (kWh)	-0-
RENEWABLE RESOURCE CREDIT COMPLIANCE THIS PERIOD	
Solar EPS kWh Requirement Compliance %	19.23%
Non-Solar EPS kWh Requirement Compliance %	125.00%
EXCESS RENEWABLE RESOURCE CREDITS BANKED THIS PERIOD	
Solar EPS kWh Banked	-0-
Non-Solar EPS kWh Banked	292,567
TOTAL EPS COMPLIANCE	61.54%
EPS FUNDING THIS PERIOD	
EPS Surcharge and Reallocation of DSM Adder plus Interest Earned	\$ 305,918.54
Green Pricing Program	\$ 0
TOTAL FUNDING THIS PERIOD	\$ 305,918.54
EPS EXPENDITURES THIS PERIOD	
PV Generation Facilities (Paid For with RUS Loan Funds)	\$ 1,443,225.00
Administrative and Legal	\$ 27,039.02
TOTAL EXPENDISURES THIS PERIOD	\$ 1,470,264.02
SINCE INCEPTION OF EPS PROGRAM	
TOTAL EPS FUNDING	\$ 971,941.84
TOTAL EPS EXPENDITURES	\$ 2,169,434.09
TOTAL RENEWABLE RESOURCE CREDITS GENERATED (kWh)	383,839
TOTAL RENEWABLE RESOURCE CREDITS PURCHASED (kWh)	4,408,785