

13-2035-01/Rocky Mountain Power
September 3, 2013
UCE Data Request 3.6

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Front Office Transactions: What emissions rate is attributed to FOTs?

Response to UCE Data Request 3.6

There is no emission rate applied to front office transactions (FOTs). Please refer to the Company's response to UCE Data Request 3.3. The cost of CO₂ emissions for any given CO₂ price scenario is applied at the source (the seller), and as such, the cost of CO₂ is included in the price of FOTs when purchased. Assigning emissions to FOTs would effectively result in assigning emissions to both the seller *and* the purchaser, resulting in double counting of CO₂ emissions and the associated cost.