

As an IPP with generation on the seam, EMMT is especially impacted by market/operational issues created by the MISO/PJM seam. We welcome the opportunity to participate in the Joint and Common Market discussion and would like to provide the following feedback:

EMMT places a high priority on a majority of the initiatives identified under the Market Operations category presented at the MISO/PJM Joint Stakeholder meeting. We believe the tasks with the highest prioritization should include: improved transmission outage coordination between RTOs, improved DAM coordination (including sharing of wind generation forecasts and overall generation status), consistency in constraint modeling and other issues that move towards a more common DAM, alignment of MISO/PJM business rules for interchange scheduling and the refinement of Market-to-Market processes which include the elimination of proxy constraint use.

At this time, EMMT does not support the development of Dispatchable Interregional Transactions but rather believes that the RTOs should focus on improving the inconsistencies on how external proxy bus prices are calculated between PJM and MISO and the alignment of interchange scheduling business rules. If these changes do not improve the market efficiency of scheduled transactions, only then should PJM and the MISO consider implementing DITs.

EMMT strongly believes that any attempts to increase Capacity Deliverability from MISO to PJM must respect the primary reliability objectives setup in the RPM construct. External resources should have access to the PJM capacity market as long as they have acquired firm transmission out of MISO and into PJM and thus are truly deliverable to the PJM market. Any attempts to undercut these rules will degrade reliability in the PJM market and would represent a transfer of wealth between RTOs. Also, all external resources meeting the minimum deliverability requirements must also comply with all existing business rules and compliance requirements as set in the PJM RPM construct. Until all these issues are resolved EMMT believes that any further work or discussion on this topic should be terminated.

PJM and MISO need to better coordinate the process of adding reciprocal flowgates. The process needs to allow for a "heads-up" to the market in advance of adding reciprocal flowgates to either the PJM or MISO models, given that adding flowgates will impact FTR valuation and funding. The "heads-up" period should be discussed and determined in the RTOs respective stakeholder meetings.

As either MISO or PJM add coordinated flow gates, the RTOs have not started modeling them in a timely fashion. We will see them bind in the real-time and day-ahead markets but the RTOs have been slow to capture them in their FTR/ARR model. The delay around modeling Coordinated Flowgates in the FTR/ARR model hurts stakeholders in multiple ways. For example, PJM believes this is one of the drivers behind their FTR under-funding problem. PJM needs to model Coordinated Flowgates in a more timely and transparent fashion in the FTR/ARR model - they should be able to do this independent of any MISO/PJM joint stakeholder process. We would like to see more transparency when there are modeling changes. For example, MISO publishes limits on all such flowgates and much more information on their ARR Allocation than PJM.

In addition, EMMT would like to see the following:

1. More information published by PJM on Annual ARR Allocation case
2. A clear timeline for participant funded transmission upgrades so they know which model PJM will use to run their study
3. The RTOs should not add flowgates to a transmission upgrade study if those flowgates were not present in the Annual ARR Allocation case. Transmission upgrades request ARRs and they must be treated the same as the rest of the Annual Allocation ARRs were treated. Transmission upgrades cannot be treated like monthly FTR requests.

EMMT is impartial to the Initiatives identified under the Broader Regional Markets category.

In concluding, we would like to reiterate that market/operational coordination is vital and should take precedence over pursuing capacity deliverability.

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