

Joint Comments – Ameren and DTE Energy

Capacity portability

Ameren and DTE Energy continue to be in support of capacity portability and ensuring efficient markets for both energy and capacity.

We are very much in support of the capacity portability initiative. We believe that capacity portability would allow for the more efficient and effective transacting of energy and capacity across the RTOs. We understand that numerous MPs have concerns over this new product; however, this type of product has the ability to better align MISO and PJM markets.

We support a focused discussion of specific issues future JCM meetings, and encourage PJM to look into FERC order 890, the calculation of CBM and transfer capability.

We believe that network external designated service is capable of being more fully utilized. We would like to better understand how PJM allocates CBM values across the ties (i.e. 3500mws). We would like to see the ATC value quantified from slide 2 of the PJM CBM's PP from 11/30/12.

Interchange Optimization

Interchange Optimization is an important step to improve market efficiencies across the MISO/PJM interface.

Scheduling Rules Alignment

The proposed solution from the November 30 JCM is to use either the MISO rules or the PJM rules to align the scheduling rules. The solution should only be viewed as an interim measure until more significant measures are taken to resolve the scheduling issue, such as the effort to shorten settlement intervals and increased focus on interchange optimization. While we are open to MISO or PJM scheduling rules, at this time, we are leaning towards PJM scheduling rules.

We believe that Capacity Portability, Scheduling Alignment and Interchange Optimization should receive the highest priority amongst the longer lead time items being vetted at the JCM meetings.

Enhanced Timing of Study Results

The Proposals 2 and 3 do not constitute a significant movement by the RTOs from status quo, and if adopted, should only be considered an interim measure. We favor Proposal 2, where the customer applies to both MISO and PJM at the same time and PJM moves directly to the Impact Study after the PJM queue closes. Additional methods to either shorten the study process or to consider the capacity portability initiative should continue to be reviewed as more permanent solutions. We support topics such as TSR & Generation Interconnection and believe they should be discussed within agenda items for the MISO & PJM Interregional planning process for Order 1000.