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**Sent:** Wednesday, December 26, 2012 10:06 AM  
**To:** Bresler, Frederick S. (Stu) III; Williams, Stanley  
**Cc:** Michael Batta; Ronald E Hart  
**Subject:** Joint & Common Market

Stu/Stan,

Having reviewed the materials and participated in the discussions, Dominion cannot support making changes to current PJM processes related to interchange transaction scheduling nor transmission service requests.

- Relative to interchange scheduling, we are not convinced that the inefficiencies cited in the examples actually reflect the value of those transactions to the market participants who created them and we are fairly certain that as volume is changed, RT LMP would change and so we believe the inefficiencies are probably overstated.
  - Dominion might be able to support some form of up-to transaction scheduling process if the PJM and MISO security constrained dispatch systems could schedule these transactions to the mutual benefit of both systems (decrease in seams congestion and balancing energy costs for both). However, it is our view that this would involve very complex software changes and, given the size of both systems, we are not sure about the ability to adequately model the constraints of both systems and the ability to then perform the necessary economic and security constrained dispatch to effectively leverage these savings. Dominion does not support a process whereby MISO and PJM real time operations staff schedules interchange transactions in order to decrease in seams congestion and balancing energy costs as we see this as a potential conflict with the ISO/RTO role as operator of its specific market.
- Relative to transmission service requests, two months ago (we were in discussions relative to designating a resource located in MISO as a PJM External Capacity Resource) we would have argued for consistency, or at least, reciprocity relative to having to execute various agreements such as those related to Feasibility and System Impact studies. However, the more the reasons for the variances have been explained the better I understand why these differ. Given these, Dominion supports proposal 1.

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