

MISO/PJM Joint and Common Market

MidAmerican Energy Company Comments Following the November 30, 2012 Meeting

MidAmerican Energy Company provides these comments in response to the invitation for comments at the November 30, 2012 MISO/PJM Joint and Common Market meeting (“JCM”).

Scheduling Rules Alignment

The proposed solution from the November 30 JCM is to use the MISO rules to align the scheduling rules. If either the MISO or PJM solution is ultimately selected, it should only be viewed as an interim measure until more significant measures are taken to resolve the scheduling issue such as the interchange optimization initiative, or shorter settlement intervals for interchange transactions.

Interchange Optimization

Interchange Optimization is an important step to improve market efficiencies across the MISO/PJM interface and should receive the highest priority amongst the longer lead time items being vetted at the JCM meetings.

Enhanced Timing of Study Results

Proposals 2 and 3 do not constitute a significant movement by the RTOs from status quo, and if adopted, should only be considered interim measures. Additional methods to shorten the study process should be considered. Also, the capacity portability initiative should continue to be reviewed as a long-term solution to this issue, but not necessarily as an immediate priority.

Capacity portability

We support continued discussions of capacity portability as a means to minimize seams issues. We encourage the RTOs to develop a discussion framework that narrows the list of issues and proposed solutions to be reviewed at upcoming MISO/PJM JCM meetings.