

Comments by Dominion Mar 13-14

Please find below the comments based on Dominion's review of Levitan's EIPC Gas-Electric System Interface Study Target 1 draft report and related appendices. Generally, Dominion does not have any substantive comments on the draft report (with the caveat that, due to time limitations, much of Dominion's review was focused on Dominion information).

The Comments on the actual appendices include:

1. Exhibit 1: The listed DTI storage fields for the PJM area are correct. However, Levitan did not include DTI's Quinlan and Woodhall pools since they are in the state of New York and not served by PJM. However, DTI would note to Levitan that DTI operates storage as integrated pools, not on a regional basis.
2. Exhibit 2: Rate Schedules
 - DTI FT Service: Note 30, as drafted, is misleading. To be clear, any service performed under DTI's FT Rate schedule is firm. We believe that the Note 30 was derived from DTI's Curtailment and Interruption Section (GT&C Section 11.3A), which does indicate that there may be an interruptible portion of Rate Schedule FT. However, generally, this reference deals with "authorized" overruns, which DTI views as interruptible for curtailment purposes. Accordingly, DTI would delete Note 30 in its entirety.
 - DTI FTNN Service: Note 34, as drafted, is incorrect. It should be revised to delete: ",and only available during the Winter Period", as follows: 34- No-notice service only available up to customer's firm storage service entitlements, and only available during the Winter Period
 - DCP ISQ Service: As noted above, ISQ (along with note 36) is listed as a rate schedule. Technically, this is incorrect because ISQ is part of the Rate Schedule LTD-1. Dominion suggests the following:

That ISQ be deleted from the rate schedule listing and the current note 36 (Service may be interrupted for Cove Point to provide Firm Peaking Service to other customers), be modified to read as follows and included on the LTD-1 line:

36- Includes ISQ service. ISQ service may be interrupted for Cove Point to provide Firm Peaking Service to other customers.
3. Exhibit 4: Levitan did not include the Chesterfield power plant. This is a 42,500 dt/day, FTNN contract, for VPPEM.