



February 27, 2008

Rae McQuade, Executive Director
North American Energy Standards Board
1301 Fannin Street, Suite 2350
Houston, Texas 77002

Re: Proposed NAESB “e-tariff” standard

Dear Mr. McQuade:

Dominion Resources Services, Inc. (Dominion) hereby submits these comments in response to the proposed North American Energy Standards Board (NAESB) “e-tariff” standards, definitions, and implementation guide (together, proposed standard), adopted by the NAESB e-tariff subcommittee on January 25, 2008 in Colorado Springs, Colorado. The proposed standard has been circulated to industry for comments as Request No. 2007 Wholesale Electric Quadrant (WEQ) Annual Plan Item 5 and 2007 Wholesale Gas Quadrant (WGQ) Annual Plan Item 8, and comments are due February 27, 2008.

Dominion understands that the WEQ and WGQ Executive Committees may at their discretion review any posted comments before they vote on or before February 29, 2008. In addition, the WGQ subcommittee co-chair indicated that he will provide a summary of comments received and pending issues to the Executive Committees prior to the vote.

Dominion submits these comments to raise certain issues that should be considered by the WEQ and WGQ Executive Committees, NAESB Board, and FERC. To this end, NAESB is encouraged to share these comments directly with the Executive Committee and Board in advance of their votes.

Dominion’s Comments:

1. Records Management.

- There is a concern of synchronizing retention periods between the Company and FERC for documents, which can be time plus event driven. How will the destruction cycle be coordinated and synchronized? Will FERC be disposing of documents according to a retention period as well?
- What provisions should be made by FERC to interface with the numerous records management platforms at Dominion to ensure coordination?

- What provisions are being considered by FERC for new commercial platforms for current and future implementations?

2. Business Impact.

- Dominion has efforts under way to address similar business needs. For example, the implementation of the product from Open Access Technology International (“OATI”). OATI is currently being implemented to assist in ensuring compliance with NERC reliability standards. Can NERC and FERC use the same system?
- What is the document management system FERC plans to use with this new version/software? How will compatibility with a FERC created system be ensured?

Dominion recommends working toward a collaborative document management system between FERC and members of the industries as opposed to trying to build parts of one. Such an approach may reduce implementation time and the level of development required on both an initial and on-going basis. “Off the shelf” document management systems already have features built in to handle versioning and security.

Dominion appreciates the opportunity to submit these comments. Dominion respects the quantity and quality of work the NAESB e-tariff subcommittee and staff and FERC staff have undertaken over the past year. Dominion respectfully requests that the aforementioned concerns be brought to the attention of the Executive Committees, Board, and FERC as the proposed standard is considered further. If you have any questions, please do not hesitate to contact me.

Sincerely,

/signature/

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dhb/mcr

cc: Jane Daly, NAESB E-tariff Subcommittee WEQ Co-chair
Keith Sappenfield, NAESB e-tariff Subcommittee WGQ Co-Chair