

**PUBLIC SERVICE COMMISSION OF WEST VIRGINIA  
CHARLESTON**

---

**CASE NO. 07-0508-E-CN**

---

**TRANS-ALLEGHENY INTERSTATE LINE COMPANY**

Application of Trans-Allegheny Interstate Line Company for a certificate of public convenience and necessity under W. Va. Code § 24-2-11a authorizing the construction and operation of the West Virginia segments of a 500 kV electric transmission line and related facilities in Monongalia, Preston, Tucker, Grant, Hardy, and Hampshire Counties, and for related relief

**THE SIERRA CLUB, INC.'S RESPONSE SUPPORTING REOPENING  
FOR SOLE PURPOSE OF ADMITTING PJM REPORT INTO EVIDENCE**

The Sierra Club, Inc. supports the motion to reopen filed by Thomas Hildebrand for the purpose of admitting into evidence the May 21, 2008 update report from PJM.

The PJM's May 21, 2008 update reports a series of scenarios resulting from the 2011-2012 Reliability Pricing Model/Base Residual Auction. Although most of scenarios suggest adjustment being required in the absence of the TrAILCo line at least one scenario, the fourth, suggests a 99% loading of the line, and no remaining loading or reliability margin, but also no reliability violation.

In short, if the alternatives assumed in the fourth scenario are adopted – and those alternatives are explained in the PJM report – no TrAILCo line is required in order to avoid the June 2011 reliability violations upon which TrAILCo predicates its application in Case No. 07-0508-E-CN before this Commission.

There are any number of questions raised by PJM's May 21, 2008 report, not all of which need to be addressed here. It is sufficient for present purposes that the May 21, 2008 report

underscores more strongly than any legal argument could the absence of any compelling evidence to rush to a decision on the March 2007 TrAILCo application based upon the obviously obsolete 2006 RTEP.

It is, frankly, inconceivable that the Commission would not reopen, at a minimum, to accept the May 21, 2008 report which bears directly on the core need issue before this Commission. Plainly, the Virginia State Corporation Commission felt compelled to consider the matter and reopened the TrAILCo proceeding before it. No persuasive reason can be suggested for ignoring this evidence.

Respectfully submitted,

**THE SIERRA CLUB**

By Counsel



William V. DePaulo, Esq. #995  
179 Summers Street, Suite 232  
Charleston, WV 25301-2163  
Tel: 304-342-5588  
Fax: 304-342-5505  
[william.depaulo@gmail.com](mailto:william.depaulo@gmail.com)

CERTIFICATE OF SERVICE

I certify service of this Response by email and US mail June 13, 2008, to the following:

Caryn Watson Short, Esq. Pub. Serv. Com'n of W. Va. Post Office Box 812 Charleston, WV 25322	Billy Jack Gregg, Esq. 700 Union Building 723 Kanawha Boulevard, East Charleston, WV 25301	Adam L. Benshoff, Esq. McNees Wallace & Nurick Post Office Box 1166 Harrisburg, PA 17108-1166
Susan J. Riggs, Esq. Spilman Thomas & Battle, PLLC P. O. Box 273 Charleston, WV 25321-0273	Elizabeth H. Rose, Esq. Post Office Box 1307 Fairmont, WV 26555-1307 <i>Laurel Run Comm. W'shed</i>	Mary Guy Dyer, Esq. Dyer Law Offices Post Office Box 1332 Clarksburg, WV 26302-1332
John Philip Melick, Esq. P O Box 553 Charleston, WV 25322-0553	Ladd and Angie Williams Route 2, Box 214C Tunnelton, WV 26444	Alan and Julie Sexstone 181 Paul Davis Road Independence, WV 26374
Susan C. Capelle, Samuel E. Dyke Route 1, Box 259 Independence, WV 26374	William Peterjohn, Susan Olcott 305 Paul Davis Road Independence, WV 26374	Mark and Julie Sullivan Route 1, Box 282 Independence, WV 26374
Letty Butcher Post Office Box 732 Reedsville, WV 26547	Timothy Hairston, IBEW Post Office Box 346 Dellslow, WV 26531	Robert Lynn Rural Route #1 Box 18 Independence, WV 26374
Bradley W. Stephens, Esq. Mountainview Manor, Suite AB Morgantown, WV 26501 <i>Halleck-Triune Community</i>	Douglas Imbrogno, Member Bhavana Society 141 Hazelwood Place Huntington, WV 25705	J. Andrew Jackson, Esq. Dickstein Shapiro LLP 1825 Eye Street, NW Washington, DC 20006-5403
Larry and Rose Willoughby PO Box 367 Amissville, VA 20106	Rosemarie Calvert Rt. 1 Box 29B Independence WV 26374	Thomas M. Hildebrand 392 Red Spruce Drive Moorefield, WV 26836
L. R. Dallas 676 West View Avenue Morgantown, WV 26505 <i>The Dallas Family</i>	Casey D. Stickley, Secretary Allegheny Club Inc. 126 South Gate Drive Fairmont, WV 26554	Robert R. Rodecker, Esq. P. O. Box 3713 Charleston, WV 25337-3713 <i>CPV Warren, LLC</i>
John Wilfred Haywood 15100 Interlochen Drive, # 604 Silver Spring, MD 20906	Charles K. Arnett 1160 Sugar Grove Road Morgantown, WV 26501	Steven Giessler 3927 River Road Morgantown, WV 26501
Bradley C. & Lynette D. Swiger Route 6, Box 345 Fairmont, WV 26554	Misty Garlow Route 4, Box 603-A Fairmont, WV 26554	Raman K. Jassal 519 Seneca Green Way Great Falls, VA 22066



William V. DePaulo