

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

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TRANS-ALLEGHENY INTERSTATE LINE COMPANY'S  
DISCOVERY REQUESTS (FIRST SET) TO THE SIERRA CLUB

Trans-Allegheny Interstate Line Company ("TrAILCo") propounds these discovery requests to the Sierra Club.

Definitions and Instructions

"Communication" means the transmittal of information in the form of facts, ideas, inquiries, or otherwise. "Concerning" means referring to, describing, evidencing, or constituting. "Document" means any writing, drawing, graph, chart, photograph, phono-record, or other data compilation from which information can be obtained, translated, if necessary, into reasonably usable form, and any draft or non-identical copy is a separate document. "Electric transmission" means the planning, assessment, siting, design, engineering, construction, operation, maintenance, financing, accounting, and/or regulation of any "high voltage transmission line of two hundred thousand volts or over" as that latter phrase is used in W. Va. Code § 24-2-11a. "Identify" when referring to persons means to give, to the extent known, the person's full name and present or last known address and telephone number. "Identify" when

referring to documents means to give, to the extent known, the document's type and general subject matter, date(s) of preparation and dissemination, author(s), addressee(s), recipient(s), and present location and custodian. "Person" means any natural person or any business, legal, or governmental entity or association. "You" and "your" mean the person to whom these discovery requests are propounded or any person acting on that person's behalf.

In addition to the requirements set forth in CSR § 150-1-13.6, TrAILCo adopts by reference the protocol set forth in Commission Staff's fourth set of discovery requests upon TrAILCo, filed September 24, 2007. In particular, please furnish all information available to you, including information in the possession of any person acting on your behalf. These interrogatories and requests are continuing; you should supplement your responses with additional information that you or any person acting on your behalf may later obtain. TrAILCo appreciates that perhaps only some of the information sought may presently exist, but please provide as much responsive information as is presently available.

#### Interrogatories

1. Identify each person whom you expect to call as an expert witness at the hearing of this case, state the subject matter on which the person is expected to testify, and state the substance of the facts and opinions to which the person is expected to testify and a summary of the grounds for each opinion.

2. For each person identified in your response to Interrogatory # 1, identify by tribunal and case style or other comparable designation each civil action, regulatory proceeding, or administrative docket in which the person has opined (including in summaries prepared by counsel) or testified (including in prefiled testimony, whether or not ultimately sponsored) on (i)

any of the subject matters identified in your response to Interrogatory # 1 or (ii) electric transmission.

3. For each person identified in your response to Interrogatory # 1, identify by publication name and date each article authored or co-authored by the person that concerns (i) any of the subject matters identified in your response to Interrogatory # 1 or (ii) electric transmission.

4. For each person identified in your response to Interrogatory # 1, identify each document reviewed by the person that concerns each such opinion.

5. For each person identified in your response to Interrogatory # 1, identify each document relied upon by the person for each such opinion.

6. For each person identified in your response to Interrogatory # 1, provide a current *curriculum vitae* and, if not specified therein, specify the academic and other qualifications (including work history) (i) for each subject on which the person is expected to testify and (ii) with respect to electric transmission.

#### Requests for Production

Please provide copies of, or make available for inspection, the following documents in your possession, custody, or control:

1. Your communications with each person identified in your response to Interrogatory # 1 that concern the subject matter(s) to be addressed or the substance of any opinion(s) to be offered.

2. Each opinion or testimony identified in your response to Interrogatory # 2.

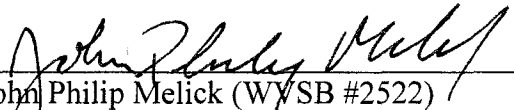
3. Each document identified in your response to Interrogatory # 3.

4. Each document identified in your response to Interrogatory # 4.

5. Each document identified in your response to Interrogatory # 5.
6. Each document identified in your response to Interrogatory # 6.

TRANS-ALLEGHENY INTERSTATE LINE COMPANY

*By Counsel*


  
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CERTIFICATE OF SERVICE

I certify service of TRANS-ALLEGHENY INTERSTATE LINE COMPANY'S DISCOVERY REQUESTS (FIRST SET) TO THE SIERRA CLUB by United States mail on September 28, 2007, addressed:

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