

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'S SECOND DISCOVERY REQUEST TO  
TRANS-ALLEGHENY INTERSTATE LINE COMPANY**

The Sierra Club, Inc. respectfully requests that the Trans-Allegheny Interstate Line Company ("TrAILCo") respond to this second discovery request in accord with the protocol agreed upon for expedited discovery.

Definitions and Instructions

"Communication" means the transmittal of information in the form of facts, ideas, inquiries, or otherwise.

"Document" or "documents" shall include all matters defined as documents by Rule 1001, W. Va. Rules of Evidence, plus the original, or a copy of any kind, of written, typewritten, printed, or recorded material whatsoever, including, but not limited to any writing, drawing, graph, chart, photograph, video or audio record, whether stored electronically, magnetically or optically, including any other data compilation from which information can be obtained and translated, if necessary, into reasonably usable form.

“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.

“Pertaining” or “pertaining to” means containing, alluding to, responding to, commenting upon, discussing, showing, disclosing, explaining, mentioning, analyzing, constituting, comprising, evidencing, setting forth, summarizing or characterizing, either directly or indirectly, in whole or in part.

“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, the Sierra Club 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.

### Interrogatories

1. **Without disclosing personal identities, or other matters that would constitute an unwarranted invasion of privacy, please identify all “customers served by the applicant” as that term is used in W. Va. Code § 24-2-11a (d)(1).** In this regard, (a) state the number of customers that will be served, (b) state the class (wholesale, commercial end-user, consumer, or other); (c) state where those customers are located by zip code or other meaningful geographic description; (d) state when you commenced service to the “customers served by the applicant;” (e) state when, if ever, you have experienced any interruption of service to the “customers served by the applicant;” (f) state the historic usage by each customer, or class of customer in a geographic region; (g) state the anticipated increase or decrease in the use of electricity by these customers; (h) state how the proposed interstate transmission line will contribute to meeting the present and anticipated requirements for electric power of the “customers served by the applicant.”

2. With regard to the “customers served by the applicant” identified in response to interrogatory 1, please state what other generators of electricity (in existence presently, now under construction or currently proposed to be constructed by entities other than yourself) could contribute to meeting those customers’ “present and anticipated requirements for electric power” as that term is used in W. Va. Code § 24-2-11a (d)(1). In this regard, (a) state where the other generators of electricity are located in relation to the geographic location of the customers identified in response to interrogatory 1 above; (b) state the current and projected electrical generating capacity of those other generators; (c) state how many miles of transmission lines will need to be constructed inside the state of West Virginia by those other generators in order to meet the present and anticipated electric power requirements of those customers.

3. For purposes of W. Va. Code 24-2-11A (d)(1) identify the “service area or region” for the proponent of the interstate pipeline which is the subject of this proceeding. In this regard, (a) identify all current electric generators in the “service area or region”, (b) state the current electric usage by all customers in the service area or region; (c) state all anticipated increases or decreases in electric usage by all customers in the service area or region for the next five years, the next ten years, and the next twenty-five years; (d) state all known increases or decreases in electric generating capacity in the service area or region over the next 5, 10 and 25 years; (e) with respect to all current electric generators or proposed increases in electric generation – by entities other than yourself – state the fuel (natural gas, petroleum, nuclear, coal, other) presently used by the generator currently, or proposed to be used in the future.

4. **Over the anticipated useful life of the proposed interstate electric transmission line, quantify, in tons per year, the carbon dioxide to be emitted into the atmosphere over the projected life of the transmission line.** In this regard, (a) state the total volume of electricity projected to be transmitted across the proposed interstate electric transmission line over the course of its anticipated useful life; (b) state what portion, if any, of the electricity over the course of the lines anticipated life will be generated by a source other than coal, identifying with respect to such portion the fuel projected to be used; (c) assuming that no carbon sequestration occurs at the sources from which the electricity is generated, state the total volume of carbon dioxide that will be emitted into the atmosphere by the electricity transmitted across the proposed line, in tons per year, over its useful life; (d) state the total volume of carbon dioxide projected to be emitted into the atmosphere, in tons per year, by the sources identified in response to subparagraph (b) of this interrogatory. If you cannot project the anticipated useful life of the proposed interstate electric transmission line, answer the foregoing questions by reference to the next 5, 10 and 25 years.

5. For purposes of the “acceptable balance between reasonable power needs and reasonable environmental factors,” identified in W. Va. Code 24-2-11a (d)(1) as a criteria for decision by the Public Service Commission with respect to the proposed interstate electric transmission line, identify the metrics you employ to conclude that the balance to be achieved by the proposed line is acceptable. In this regard, (a) state generally what types and level of environmental degradation you deem acceptable to achieve the proposed volume of electric transmission that will result from the construction and operation of the proposed line; (b) specifically, with reference to the next 5, 10 and 25 years (and the useful life of the proposed line, if different), state what volume of carbon dioxide could be emitted into the atmosphere, in tons per year, in relation to the volume of electricity to be generated, without causing an unacceptable imbalance between power needs and environmental factors.

### Requests for Production

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

1. Produce all documents in your possession which support, contradict or otherwise pertain (contain, allude to, respond to, comment upon, discuss, show, disclose, explain, mention, analyze, constitute, comprise, evidence, sett forth, summarize or characterize, either directly or indirectly, in whole or in part) to the facts or projections stated in your responses to interrogatories above.



**THE SIERRA CLUB, INC.**

By Counsel




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CERTIFICATE OF SERVICE

I certify service of this request by email or US mail October \_\_\_\_, 2007, to the following:

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