

✓

**Wallace S. Venable**  
393 Helmick Road  
Morgantown, WV 26501-2099  
(304) 328-5128  
wallace.venable@mail.wvu.edu

20 November 2017

01:02 PM NOV 27 2017 EXEC SEC DIV

Ingrid Ferrell  
Executive Secretary  
Public Service Commission of West Virginia  
201 Brooks Street  
Charleston, WV 25301

1 Protest Original (s)

Re: Longview Power, LLC  
Application of Longview Power, LLC for Waiver of Material Modification Requirements or for  
Modification of Siting Certificate  
Case No. 17-1450-E-CS-PC

My wife and I own the residential property at 692 Fort Martin Road. This property is directly adjacent to the barge facility owned by MEPCO on which the major changes to the Longview permits are to be made.

I will start this document by stating that my knowledge of the proposed changes has all come through informal sources, and that I have received no formal notification of any kind. I believe that there are many more people in the Fort Martin-VanVoorhis area who are entitled to notice.

As a retired engineering professor involved in Monongahela River issues, I have considerable knowledge of the various aspects of this proposal.

Longview's proposed siting modification to change its present delivery of coal from the 4.5-mile conveyor belt to a new facility via a conversion of an existing MEPCO dock facility on the Monongahela River will or may impact me in several significant respects. The increased truck traffic will generate additional noise, dust, and engine emissions on our property which is already subject to these impacts from the current loading facility.

My primary concerns are not for personal inconveniences we may suffer as a result of the changes, but for its impacts on the Morgantown community.

It would appear that the proposal has not considered the fact that University High School and The Madison, a nursing facility, are functionally in close proximity to the proposed haulage route, although by road they are separated by many miles. A sizable number of new residences are also located in this affected zone directly across the river, as well as medical and law offices. These are about a mile from the proposed truck route, and with the prevailing winds from the west they will experience significantly increased diesel emissions and coal dust. Noise will be increased because, for many locations, there is

nothing between them to absorb sound in winter, it is a line-of-sight situation

The new plan will greatly increase truck traffic on Fort Martin road. Not only will the number of trips increase dramatically, but the emissions per vehicle will increase as the direction of loaded vehicles will be reversed, send loads up the hill, rather than down.

Fort Martin Road between the MEPCO facility and the top of the ridge climbs approximately 300 feet over a distance of about 4000 feet. This results in an average grade of about 7.5%, and the grade probably exceeds 10% over a significant distance. As a result not only diesel emissions, but also noise will be increased, and the grade will slow vehicles, further increasing annoyance to the community. (see attached map) For the University High School the separation is about 1 mile, but for some residences on the hill top the distance is less the ½ mile.

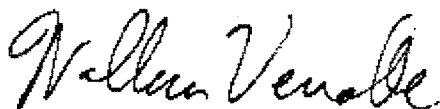
These emission hazards are in addition to the increase in road danger resulting from increased traffic on a very steep road. The road is a school bus route, a mail route, and a route for oversize and overweight traffic to the Fort Martin Power Station and to oil and gas wells north of the power plants, in addition to serving local passenger traffic.

As an engineer, it seems to me that a conveyor from the river directly to the Longview plant would be a more economical alternative, as well as reducing the hazards and inconveniences of the change in coal source. The proposal submitted to the Commission shows no evidence of consideration of any alternatives.

Some might refer to Longview's statement that these are minimal changes as disingenuous. The changes to the power plant are, in fact, minimal, but the changes to MEPCO's operations are dramatic, and MEPCO is under the same overall ownership.

I support Monongahela Power's call for full hearings on this issue, and public presentation of evidence on the impacts and alternatives to this change.

Respectfully submitted this 20th day of November, 2017.

A handwritten signature in black ink that reads "Wallace Venable". The signature is written in a cursive, flowing style.

Wallace Venable

01:02 PM NOV 27 2017 EXEC SEC DIV



01:03 PM NOV 27 2017 EXEC SEC DIV