

**PUBLIC SERVICE COMMISSION OF WEST VIRGINIA**

CASE NO. 09-0770-E-CN

PATH WEST VIRGINIA TRANSMISSION COMPANY, LLC;  
PATH ALLEGHENY TRANSMISSION COMPANY, LLC;  
PATH-WV LAND ACQUISITION COMPANY; and  
PATH-ALLEGHENY LAND ACQUISITION COMPANY

**SIERRA CLUB, INC. AND WEST VIRGINIA HIGHLANDS CONSERVANCY  
FOURTH SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS DIRECTED TO APPLICANT**

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Pursuant to Rule 13.6 of the Rules of Practice and Procedure of the West Virginia Public Service Commission (“the Commission”), and the Commission Order entered in this proceeding on August 4, 2009, the Sierra Club, Inc. and the West Virginia Highlands Conservancy, by their counsel, William V. DePaulo, Esq., hereby propound the following Interrogatories and Requests for Production of Documents Directed to the Applicant.

**INSTRUCTIONS AND DIRECTIONS**

The Instructions and Directions from Sierra Club and the West Virginia Highlands Conservancy’s First Set of Interrogatories and Request for Production of Documents are incorporated herein by reference.

**THE SIERRA CLUB and  
WEST VIRGINIA HIGHLANDS CONSERVANCY**

By Counsel

  
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## **INTERROGATORIES**

1. What was the basis for the generation dispatch used in the base case load flows, and in any other load flows used in the analyses?

2. What changes would have to be made to the base dispatch to eliminate each violation of NERC or other planning standards or criteria? (Assuming PATH etc. were not built.)

3. How many hours in a typical year would the system have to be operated out-of-merit to prevent any violations of NERC or other planning standards or criteria? (Assuming PATH etc. were not built.)

4. What was the total power flow in MW represented on the PJM West-Central and PJM Central-East interfaces in each base or other relevant load flow case?

5. Please explain step-by-step how the generation deliverability and load deliverability tests are applied, using an actual example.

6. Define electrically, and depict on both a one-line diagram and physical map, how each area or zone used in the generation deliverability and load deliverability tests is defined.

7. What was the net import/export for each area or zone in each base or other relevant load flow case?



8. List all generating units assumed to be available in each such area or zone.

9. Please list the maximum summer capability in MW for each unit listed in response to interrogatory 8.

10. Please list the scheduled output in MW for each unit listed in response to interrogatory 8 for every “limiting” case.

11. Please list the total reduction in generating output for each area or zone.

12. What was the total load assumed in each area or zone?

13. What was the average load power factor assumed in each area or zone?

14. What inter- and intra-area transfers were assumed in the 2006 RTEP base case?


15. What inter- and intra-area transfers were assumed in the 2007 RTEP base case?



16. What were the effects of outages of each of the proposed new transmission facilities on parallel (non-PJM) systems, as a percentage of the initial flow on the outaged facility?

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **FOURTH DISCOVERY REQUEST TO APPLICANT FROM THE SIERRA CLUB AND WEST VIRGINIA HIGHLANDS CONSERVANCY** was filed with the Executive Secretary of the Commission, and that an original copy was served upon the Applicant by email to Christopher Callas, Esq. <ccallas@jacksonkelly.com>, and J. Philip Melick, Esq. <pmelick@jacksonkelly.com>, this 19<sup>th</sup> day of August, 2009.

  
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William V. DePaulo