

**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  
SIXTH 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. Please provide modeling output and input data as follows for all ProMod production cost modeling runs completed by PJM for the PATH line as part of the Transmission Expansion Advisory Committee “Market Efficiency Analysis” posted at <http://www.pjm.com/committees-and-groups/committees/teac/teac-archive.aspx>. Namely, for each of the two sets of analyses which produced summary results labeled in the noted TEAC archive section of the PJM website as “Amos-Kempton 765 kV.xls” and “Amos-Kempton-Deans 765 kV.xls”, provide the following:
  - a. A description of the nature of, and reasons for, the ProMod runs made for each of these market efficiency analyses.
  - b. The hourly (or other smallest temporal interval available) generation output and system import and export files, by unit and/or interface, for all of the system generation and external imports and exports, for all hours (or other smallest temporal interval used) of each and all years for which the analyses were completed – 2007, 2010, and 2013.
  - c. The total system hourly loads and the hourly loads by zone as represented in the model, for each of the years analyzed.
  - d. The fuel cost projections used for each of the analyses.
  - e. The transmission system interface constraints used in the analyses.

2. Please provide modeling output and input data as follows for any other ProMod production cost modeling runs completed by PJM for the PATH proposal, separate from the Amos-Kempton-Deans analyses:
  - a. A description of the nature of, and reasons for, the ProMod runs made for each of these market efficiency analyses.
  - b. The hourly (or other smallest temporal interval available) generation output and system import and export files, by unit and/or interface, for all of the system generation and external imports and exports, for all hours (or other smallest temporal interval used) of each and all years for which the analyses were completed – 2007, 2010, and 2013.
  - c. The total system hourly loads and the hourly loads by zone as represented in the model, for each of the years analyzed.
  - d. The fuel cost projections used for each of the analyses.
  - e. The transmission system interface constraints used in the analyses.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **SIXTH 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. <callas@jacksonkelly.com>, and J. Philip Melick, Esq. <pmelick@jacksonkelly.com>, this 19<sup>th</sup> day of August, 2009.



William V. DePaulo