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November 7, 2017

**VIA FAX AND FEDEX OVERNIGHT**

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

02:57 PM NOV 07 2017 EXEC SEC DIV

**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**

Dear Ms. Ferrell:

Enclosed please find a *Petition to Intervene, Request for Hearing, and Request for additional Notice of Monongahela Power Company and The Potomac Edison Company* in the above-referenced matter.

Sincerely,

Gary A. Jack  
Senior Corporate Counsel  
WV State Bar No. 1855

GAJ:dml

Enclosure

cc: Certificate of Service

**PUBLIC SERVICE COMMISSION  
OF WEST VIRGINIA  
CHARLESTON**

**CASE NO. 17-1450-E-CS-PC**

**LONGVIEW POWER, LLC**

02:57 PM NOV 07 2017 EXEC SEC DIV

**Application of Longview Power, LLC for  
Waiver of material modification requirements or  
For modification of siting certificate.**

**PETITION TO INTERVENE, REQUEST FOR HEARING, AND  
REQUEST FOR ADDITIONAL NOTICE OF  
MONONGAHELA POWER COMPANY and THE POTOMAC EDISON COMPANY**

1. Pursuant to Rule 12.6 of the Commission's Rules of Practice and Procedure and W. Va. Code § 24- 1-1, et seq., Monongahela Power Company ("Mon Power") and The Potomac Edison Company ("PE") (together the ("Companies")) petition to intervene and request a hearing in Longview Power LLC's ("Longview") application for waiver of a material modification requirement or modification of its siting certificate

2. Mon Power built, operates, and owns its 1100 MW Fort Martin power station ("Ft. Martin") located along the Monongahela River in Madsville, WV. That plant has operated continuously since 1967 at its location serving retail West Virginia customers of Mon Power and PE for decades with low-cost, reliable generation. In 2004 and 2006, Longview proposed and chose to build its plant and related facilities only about 1 mile from Ft. Martin (directly across the Ft. Martin Road from the Ft. Martin power station) on land-locked property without direct access to the Monongahela River. Ft. Martin is currently one of only two coal-fired generation stations owned by Mon Power, and its smooth and efficient operation is critical to West Virginia electric customers, the rates that they pay, and to the State of West Virginia.

3. 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 Mon Power and its Ft. Martin power station in several significant respects. First, Mon Power currently uses that MEPCO dock facility for coal delivery from that dock to Ft. Martin's coal barge unloading facility for a substantial amount of the coal burned at Ft. Martin. Now, Longview proposes a conversion to that dock. The Companies need to determine the change or impact a conversion of the dock will cause, the impact of another possible user of the dock facility, and to what extent and manner it would or may impact the Ft. Martin river barge operations by the proposed conversion. Ft. Martin receives all of its coal by barge, and this Longview proposed change in coal deliveries could adversely impact not only Ft. Martin's coal deliveries from the MEPCO dock but for other barge coal deliveries as well.

4. Longview's proposal to then truck the coal from the Mon River to its plant by an estimated 314 trucks per day causes additional concern for the Ft. Martin operations. The roads in the area are limited and congested. Since these Longview trucks would be expected to run during the daylight hours (7am—3 pm), that is approximately 40 trucks per hour, or one truck every 1.5 minutes along these existing roadways. The Companies are concerned, for themselves and their ratepayers, the logistical and cost impact such increased truck traffic will have on Ft. Martin operations, including the existing vehicular traffic in the area, the detrimental impact on employees and contractors who work at or for Ft. Martin, the effect on other businesses and residents in the area, and for safety in the area. Additionally, noise and dust from the increased vehicular flow could be a concern.

5. Mon Power is concerned with possible new or additional rules and regulations that road authorities may place on the roadways as a result of the proposed increased truck traffic due

to any siting modification and, if it were to occur, the adverse impact on Ft. Martin operations and its costs resulting from any new rules and regulations.

6. The Companies have direct and significant interests in this proceeding, and those interests are not represented by any other party of record. The Companies petition the Commission for leave to intervene in order to represent the interests of them, their ratepayers, and the jobs of hundreds of employees and contractors of the Ft. Martin Power Station. Because of the adverse impact the Companies believe, at this point, this proposal will have on Ft. Martin and the West Virginia ratepayers they serve, the Companies respectively request a hearing be established in this matter along with a procedural schedule permitting discovery and testimony.

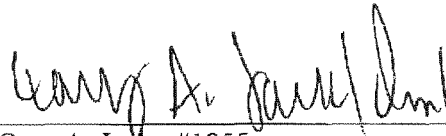
7. Regarding notice of this proposed certificate modification, Mon Power learned of this proposal only because it follows the Commission's daily filings report. Had it not been following such daily filings, it would not have known about this filing. In order to assure that all residents and operations in the area are aware of this proposed filing, including those who may not subscribe to a newspaper, the Companies recommend and request that Longview serve notice of this proposed change on any landowner or resident within a reasonable circumference of the Longview plant, the Mepco dock facility, and the roadway between the two. The Companies note that in the citing cases (Case No 03-1860-E-CS-CN and Case No 05-1467-E-CN) there were numerous residents and entities who had an interest in the siting matters before the Commission and who filed letters of protest or otherwise participated. The Companies further note that it appears no party or other persons who otherwise participated in those original siting certificate cases were served or notified of this proposed siting certificate modification. The Companies believe those known interested parties from the previous siting proceedings should be served along

with other residents/land owners within a reasonable area who may be impacted by the proposed change.

8. Having demonstrated an interest in this proceeding sufficient to allow it to intervene, Mon Power and PE move that they be granted the right to intervene, to participate as a party to the proceedings, that a hearing and procedural schedule be established, and that Longview provide notice of this filing to those interested persons from the previous siting certificate cases and those who live or own property within a reasonable circumference of the impacted area.

Respectfully submitted this 7<sup>th</sup> day of November, 2017.

Monongahela Power Company  
The Potomac Edison Company  
By Counsel



Gary A. Jack #1855  
Mon Power/PE  
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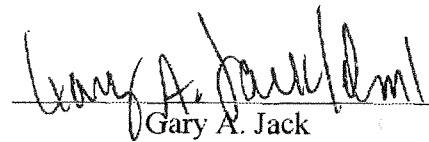
**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of November 2017, a copy of the foregoing

**Motion to Intervene** was sent by U.S. Mail, First Class, to:

Chris Callas  
Jackson Kelly  
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Charleston, WV 25322

John Auville  
Staff Attorney  
Public Service Commission of West Virginia  
201 Brooks Street  
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Charleston, WV 25323

  
Gary A. Jack



Legal Services, 5001 NASA Boulevard, Fairmont, WV 26554

**FAX**

Date: 11/7/17

Number of pages including cover sheet: 7

To:

Ingrid Ferrell

Executive Secretary

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Please comment

**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-PC**

**Petition to Intervene**

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