



MON VALLEY CLEAN AIR COALITION

Ingrid Ferrell, Executive Secretary
WV Public Service Commission
P. O. Box 812, Charleston, WV 25323

RE: Longview Case No. 17-1450-E-CS-PC

Date: December 12, 2017

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The WV PSC owes to the people of WV (a) a rational process that fully takes into account the factors that affect the public and (b) a logical process that considers the full significance of the issues, the manner of their interaction and how the basic issues affect the other issues involved in each (this) Case.

Seven substantive ("protest") letters were received in this Case, yet the WV PSC has apparently lacked the time or inclination to consider them. The COMMISSION ORDER of December 7th stated that "This Order grants intervention, sets a hearing and requires notice of the hearing." In the BACKGROUND on Page 4 it is stated that "The Commission has received several letters protesting increased coal truck traffic on the road." Now this is an inadequate characterization of the letters as they cover so much more; and further, this is the only acknowledgement that letters were received, period!

In this same document, on Page 5 under CONCLUSIONS OF LAW, it is stated that "The request by Mon Power and PE for additional notice of the filing should be denied." Here is evidence that the WV PSC is regarding the Case as insignificant relative to the public, the residents of the affected area.

The basic issue is that Longview can no longer rely upon their 4-West Mine for the coal supply to the Longview Power plant. A belt conveyor system of 4.5 miles length, crossing the State Line, is used. So the basic questions are what new coal and what deliver system shall be used? Are there WV coals available; to be sure in the current market. Is it time to consider other fuels, such as natural gas; to be sure there is plenty of natural gas in northern West Virginia (and southwestern Pennsylvania).

On November 14th, the WV PSC Staff submitted the INITIAL JOINT STAFF MEMORANDUM. This document contains the UTILITIES DIVISION INITIAL MEMORANDUM in which it states on Page 2, "The Utilities Division notes that no financial or economic evaluation is needed for a waiver of the requirement to obtain this modification or amendment to the Siting Certificate. Therefore, the Utilities Division defers comment to the disposition of the case to the Engineering Division." So the Utilities Division was unable to identify the basic issues that should be answered in the public interest. And, further, the Engineering Division has been silent. So the Case was deferred to the Engineering Division, but no response has been forthcoming. Where does this leave the public concerns and the public interest? Is this all not happening within the "public" service commission?

The Longview plans in this Case are illogical and unreasonable.

Longview representatives appear to have misrepresented their noise analysis in the very beginning. And, Longview did not monitor road noise as originally planned, and has not. The road noise is clearly excessive, knowing how such noises travel in this Valley.

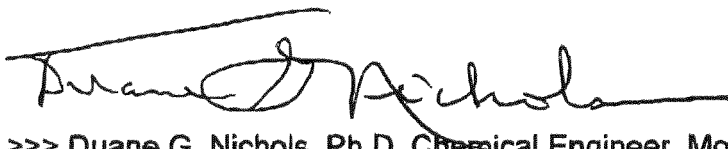
We know that the sounds and vibrations of loaded diesel trucks laboring their way up the Ft. Martin hill will be heard for miles away, a nuisance to those living near and farther away. We should not be subjected to this for the remaining lifetime of this plant.

Given the need for a different energy input source, it is time to consider WV coal, alternative delivery systems, and options other than diesel trucks with their toxic fumes and dangerous fine particle emissions. The CCC Overland Conveyor currently in use could be moved to a new location if barging of coal must be used. See the Note below about the Conveyor system.

The coal delivery alternatives are many. The direct truck route from the Cumberland mine preparation plant to the Longview plant is an incredibly short distance involving no long uphill grades. There is an optional plant access route via WV Route 100 and Crafts Run Road. We also know that Longview has not correctly reported the distance involved from the Mon River site up to the plant coal yard.

Many circumstances have changed since Longview was granted a Siting Certificate. We know that climate change is closing in on us to such an extent, we owe it to our residents and our friends around the world to consider natural gas as a low cost and low carbon dioxide producing fuel. This would eliminate many of the other problems -- road traffic, road damages, diesel noise, diesel pollution, etc. (See our previous two letters.)

Submitted via FAX,



>>> Duane G. Nichols, Ph.D. Chemical Engineer, Mon Valley Clean Air Coalition
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Note: RE: MEPCO Overland Conveyor - Pennsylvania to West Virginia
Vimeo Video: 4:46 minutes (ca. 2013) "CCC Group was responsible for the Engineering, Procurement and Construction (EPC) contract for the installation of 4.5 miles of overland conveyor for MEPCO's Coal Delivery System. The conveyor will transport coal from the Longview Coal 4 West Mine in Pennsylvania to the Longview 695 MW Power plant in Madsville, WV." [<https://vimeo.com/87218839>]

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