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July 11, 2011

Via Hand Delivery

Ms. Sandra Squire
Executive Secretary
Public Service Commission of West Virginia
201 Brooks Street
Charleston, West Virginia

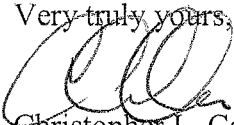
04:08 PM JUL 11 2011 PSC EXEC SEC D E W

Re: Case Nos. 07-0508-E-CN and 09-0770-E-CN (Closed entry)

Dear Ms. Squire:

Enclosed please find an original and twelve copies of the Response of Trans-Allegheny Interstate Line Company, Monongahela Power Company, and The Potomac Edison Company to the Staff Petition to Reopen.

Please file this letter and the Response and circulate the twelve additional copies to the appropriate parties at the Commission. We also ask that you date stamp the extra copy of this letter and the enclosed materials and return them with our messenger. As always, we appreciate your assistance in this matter.

Very truly yours,

Christopher L. Callas

CLC/sla

- c: Parties on Service Lists
- Randall B. Palmer, Esq.
- Jennifer L. Petrisek, Esq.
- James R. Bacha, Esq.
- Hector Garcia, Esq.

PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON

CASE NO. 07-0508-E-CN

TRANS-ALLEGHENY INTERSTATE
LINE COMPANY

Application of Trans-Allegheny Interstate Line Company for a certificate of public convenience and necessity under W. Va. Code § 24-2-11a authorizing the construction and operation of the West Virginia segments of a 500 kV electric transmission line and related facilities in Monongalia, Preston, Tucker, Grant, Hardy, and Hampshire Counties, and for related relief

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

Joint application for certificates of public convenience and necessity under W. Va. Code § 24-2-11a authorizing the construction and operation of the West Virginia segments of a 765 kV electric transmission line and related facilities in Putnam, Kanawha, Roane, Calhoun, Braxton, Lewis, Upshur, Barbour, Tucker, Preston, Grant, Hardy, Hampshire, and Jefferson Counties, including modifications to the Amos Substation in Putnam County and a new substation in Hardy County, and for related relief.

RESPONSE OF TRANS-ALLEGHENY INTERSTATE LINE COMPANY,
MONONGAHELA POWER COMPANY, AND THE POTOMAC EDISON COMPANY
TO STAFF PETITION TO REOPEN

Trans-Allegheny Interstate Line Company, Monongahela Power Company, and The Potomac Edison Company (the “Companies”) respond to the Commission Staff’s June 30, 2011 Petition to Reopen (“Petition”) in Case Nos. 07-0508-E-CN (the “TrAIL Case”) and 09-0770-E-

CN (the “PATH Case”). The Companies are mindful of their obligation from the TrAIL Case to file a plan for reconductoring or otherwise upgrading their transmission facilities (“Plan”) within one year of May 19, 2011, the in-service date for the Trans-Allegheny Interstate Line (“TrAIL”). The Companies believe there is no compelling reason to accelerate the Commission’s initial filing date for the Plan. If, however, the Commission determines that filing the Plan earlier than May 2012 is necessary, the Companies believe they will be able to file the Plan within 120 days of a Commission Order directing them to do so.

From a procedural perspective, and for the reasons explained herein, the Companies oppose the reopening of the PATH Case.

The Companies’ Position on Staff’s Requested Acceleration of the Plan Due Date

1. The Companies fully intend to comply with their obligation to file the Plan in May 2012, as the Commission required in its August 1, 2008 order in the TrAIL Case. Because this filing deadline is still ten months away, the Companies have not yet deployed the personnel and resources needed to complete the Plan. Further, to provide a meaningful, useful and accurate presentation, the Companies require a reasonable period of time to prepare the plan. With the approval of the merger between FirstEnergy and Allegheny Energy, FirstEnergy is reviewing the reliability and physical condition of transmission facilities in the Allegheny Power Transmission Zone. The Companies believe this review will be valuable to the Plan, but the 30-day period the Staff suggests will not provide sufficient time to complete the review and incorporate any additional information that may result from it. In addition, the West Virginia transmission facilities are scheduled for the next aerial inspection in a few months, and the Companies believe the additional information derived from this inspection would be valuable to the Plan.

2. The Petition also includes a number of faulty premises upon which the Commission should not rely in ruling on the Petition.

a. In the Petition, the Staff asserts, in effect, that the need for future transmission expansion can be obviated by reconductoring or rebuilding transmission lines in West Virginia. This is not necessarily the case. Apart from the identification by PJM Interconnection, L.L.C. (“PJM”) of NERC reliability violations on the Pruntytown to Mt. Storm and Harrison to Pruntytown 500 kV transmission lines in previous RTEP studies forming the basis for a reliability need for the PATH Project, PJM has not projected any serious reliability violations on the Companies’ 500 kV lines in West Virginia, and has not directed the Companies to reconductor or rebuild any 500 kV line in West Virginia. (The Commission should note that unlike the Mt. Storm to Doubs 500 kV line, the Pruntytown to Mt. Storm 500 kV line was not constructed with “weathering” steel, and therefore does not have the condition problems associated with that material.) Moreover, a settlement approved by the Commission in the TrAIL Case obligated the Companies to file a study of the feasibility of re-tensioning, double-circuiting, or reconductoring overloaded lines in the Allegheny Power Transmission Zone in all future § 24-2-12a certificate applications – an obligation the PATH applicants complied with in the PATH Case.¹ This obligation reflects the Commission’s appreciation that reconductoring is not necessarily a feasible alternative to the construction of new transmission lines. In summary, while there often are valid reasons to reconductor or

¹ In addition, to the extent that any such overloaded line is outside the Allegheny Power Transmission Zone, and the route of the proposed transmission line passes into or through the Allegheny Power Transmission Zone, the Companies are obligated to formally request that PJM either (i) conduct such a feasibility study for each overloaded line or (ii) direct that the Transmission Owner of such overloaded line conduct such a feasibility study.

rebuild transmission facilities from time to time, and the Commission has required feasibility studies in future transmission line siting cases, it does not follow that developing expansive (and expensive) reconductor/rebuild plans outside of the PJM planning process is prudent, justified from a regional reliability perspective, or cost-effective for West Virginia electric customers.

b. The Staff's sense of urgency on the preparation and filing of the Plan is misplaced. While further development efforts with regard to the PATH Project have been suspended and the application for authorization to construct the project in West Virginia has been withdrawn, any new § 24-2-12a certificate application for authorization to construct the PATH Project in the Allegheny Power Transmission Zone will require the Companies (either directly or through the applicant), as provided in the settlement approved in the TrAIL Case, to file a study of the feasibility of re-tensioning, double-circuiting, or reconditioning overloaded lines in the Allegheny Power Transmission Zone. In addition, PJM did not direct the Companies to rebuild or reconductor any of the Companies' major West Virginia transmission facilities in the 2010 RTEP. Moreover, the Companies are unaware of any new plan to reconductor or upgrade any of these facilities, and such a project would not likely be incorporated into PJM's 2011 RTEP (which will be substantially completed five months from now). Nor do the Companies believe that any of their major transmission facilities in West Virginia is in a critical state of disrepair, such that prompt action to rebuild them is necessary. Although the Companies appreciate the Staff's desire to review the Plan sooner than next May, there is no reason to believe that filing the Plan within the one-year period previously established

by the Commission does not continue to be appropriate, and certainly no reason not to afford the Companies a reasonable period of time to prepare and file the Plan.

c. Most importantly, the Petition reflects the Staff view that the Commission should require West Virginia electric utilities to upgrade existing EHV facilities for the principal purpose of avoiding the construction of new transmission lines in the future. Staff's candor on this point is appreciated (Petition at 4), but the Staff position ignores the Commission's endorsement, found in the same Commission Order requiring the Companies to file the Plan, of the PJM RTEP process as the mechanism by which regional transmission planning should be conducted. Utilities should not be required to develop transmission rebuilding or reconductoring projects, and then to advocate their construction with PJM, primarily as a means to forestall future regional transmission development projects, where under future circumstances, other alternatives (including new transmission lines) may be more effective or otherwise preferable. The Companies certainly believe that when an identified regional reliability violation can be remedied with equal effectiveness by reconductoring an existing facility or constructing a new facility, reconductoring will usually be the better choice from the perspectives of cost and environmental impact; in such a situation, the Companies would not propose to "build new" when reconductoring is feasible and effective. However, the Companies oppose the concept of undertaking *any* expensive transmission enhancement – rebuilding or reconductoring existing facilities, or building new ones – if there is no demonstrated need, from a facility-condition or regional reliability standpoint, to do so.

3. The Companies understand the Staff view that the Plan should focus on the condition of the Companies' major transmission facilities, leaving to the PJM planning process

any potential reliability-based determination of whether there is an established electric need for those facilities to be recondored or otherwise upgraded. Staff's recommendation that the Companies "take inventory of the condition of their transmission facilities and . . . decide what, if any, action is necessary in regards to those facilities" (Petition at 2) is exactly what the Companies intend to do in the Plan for their EHV facilities in West Virginia.

4. If the Commission determines that filing the Plan before its current May 2012 due date is necessary, the Companies will require at least 120 days from the date of the Commission Order directing them to do so. The Companies expect that this period will provide sufficient time to prepare a Plan document for the Commission's review, but still accelerate the Plan's filing date by as much as six months as compared with the current schedule.

The Companies Oppose Reopening the PATH Proceeding

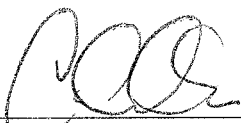
5. As noted above, the Companies have acknowledged their obligation to file the Plan. However, this obligation arose from a Commission Order in the TrAIL Case, and not the PATH Case. Moreover, none of the PATH applicants is a utility or owns transmission facilities in West Virginia, and consequently there is no need to reopen the PATH Case to impose a plan filing obligation on them. Finally, the Companies understand that Appalachian Power Company and Wheeling Power Company, AEP's jurisdictional utilities in West Virginia, have advised the Commission of their willingness to file a similar plan with the Commission, outside of the TrAIL or PATH Cases. For these reasons, reopening the PATH Case is inappropriate and unnecessary.

WHEREFORE, if the Commission determines that advancing the date for filing the Plan is necessary, then the Companies respectfully request that they be required to file the Plan not sooner than 120 days from the date of the Commission Order. The Commission should deny the request to reopen the PATH Case.

Dated this 11th day of July, 2011.

TRANS-ALLEGHENY INTERSTATE LINE COMPANY,
MONONGAHELA POWER COMPANY, AND THE
POTOMAC EDISON COMPANY

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CERTIFICATE OF SERVICE

I certify service of this RESPONSE OF TRANS-ALLEGHENY INTERSTATE LINE COMPANY, MONONGAHELA POWER COMPANY, AND THE POTOMAC EDISON COMPANY TO PETITION TO REOPEN by U. S. mail on July 11, 2011 addressed:

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