

**KAY
CASTO
& CHANEY**
Attorneys at Law PLLC

1500 Chase Tower • 707 Virginia Street East • Charleston, WV 25301
Mailing Address: P.O. Box 2031 • Charleston, WV 25327
Telephone (304) 345-8900 • Fax (304) 345-8909
www.kaycasto.com
E-Mail: rrodecker@kaycasto.com

August 7, 2017

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

02:41 PM AUG 07 2017 PSC EXEC SEC DIV

RE: CASE NO. 17-0631-E-P
AMERICAN BITUMINOUS POWER PARTNERS, L.P.
and MONONGAHELA POWER COMPANY

Dear Ms. Ferrell:

Enclosed herein please find one (1) copy of the **public version** of American Bituminous Power Partners, L.P.'s ("AmBit") Responses to Staff's First Data Request of AmBit. Monongahela Power has neither participated in the preparation of, nor has reviewed, these responses as all of the data requests were directed to AmBit.

Response Nos. 1.4, 1.5, 1.6, 1.7, 1.8, 1.9 and 1.14 contain confidential information and are being provided to Staff and WVEUG subject to Protective Agreements they have entered into with AmBit and Mon Power. Any other party to this proceeding desiring to review the documents provided in the responses listed above is also required to enter into a Protective Agreement. Two (2) copies of the confidential version of referenced responses are being provided herewith in a sealed envelope.

The Confidential version of the document has been served upon Staff Attorney John Auville and counsel for WVEUG with the public version being served upon the remaining parties of record as evidenced by the attached Certificate of Service.

Sincerely,



Robert R. Rodecker
WV State Bar No. 3145

enclosures
cc: Gary A. Jack, Esquire

C H A R L E S T O N • M O R G A N T O W N • F A Y E T T E V I L L E

BEFORE THE
PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON

PUBLIC VERSION

CASE NO. 17-0631-E-P

AMERICAN BITUMINOUS POWER PARTNERS, L.P.
and MONONGAHELA POWER COMPANY

02:41 PM AUG 07 2017 PSC EXEC REG DIV

**RESPONSES TO
STAFF'S FIRST DATA REQUEST
OF AMBIT**

Now comes American Bituminous Power Partners, L.P. ("AmBit"), by counsel,
and submits the attached Responses to the Staff's First Data Request of AmBit.

AMERICAN BITUMINOUS POWER PARTNERS, L.P.

By Counsel



Robert R. Rodecker, WV Bar ID 3145
John R. McGhee, Jr., WV Bar ID 5205
Kay Casto & Chaney PLLC
1500 Chase Tower, 15th Floor
707 Virginia Street, East
Charleston, WV 25301
Telephone: (304) 345-8900

**PSC STAFF FIRST DATA REQUEST OF AMBIT
AMERICAN BITUMINOUS POWER PARTNERS, L.P.
AND MONONGAHELA POWER COMPANY
P.S.C. CASE NO. 17-0631-E-P**

Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

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REQUEST NO. 1.1:

Please refer to Exhibit JPM-2, Page 17 of 25 attached to the testimony of John P. Mustonen. On Page 17 of the report, it states that the “all-in-cost” for AmBit included fuel purchased, trucking, handling/processing, limestone for SO₂ and resulting ash disposal costs. For each “Source” identified in the table shown as “Exhibit 4-1: Sources of Fuel for Grant Town”, please provide the following information:

- a. The annual tonnage of waste coal used to derive the “All-in Cost \$/MMBtu”.
- b. The projected annual FOB mine cost in \$/ton of the waste coal (exclusive of loading and handling) calculation.
- c. The projected annual cost in \$/ton of loading and handling of the waste coal
- d. The projected annual cost in \$/ton of trucking the waste coal to the plant.
- e. The projected annual cost in \$/ton of handling/processing the waste coal (if different and in addition to the cost in (c) above.
- f. The projected annual cost of limestone in \$/ton of waste coal.
- g. The projected annual cost of ash disposal in \$/ton of waste coal.
- h. Any other fuel-related costs in \$/ton that is not provided for in the above items.

RESPONSE NO. 1.1:

See Response 1.1-Attachment A attached hereto.

AmBit Response 1-1 - Attachment A
7/31/2017

HRT		a	b	c	d	e	f	g	h	Sources
		tons	\$/Ton	\$/Ton	\$/Ton	\$/Ton	\$/Ton	\$/Ton	\$/Ton	
Barrackville	CG	100752	\$15.94	\$2.50	\$3.50	\$2.00	\$6.30	\$1.99	\$0.00	mine refuse site
Farmington	CG	10980	\$8.50	\$2.50	\$4.70	\$2.00	\$4.75	\$2.00	\$0.00	mine refuse site
Farmington	Silt	44982	\$4.37	\$2.50	\$4.07	\$2.00	\$5.19	\$1.40	\$0.00	mine refuse site
LP Mineral	NCM	130215	\$19.35	\$3.50	\$4.84	\$2.00	\$6.68	\$1.92	\$0.00	active strip mine
Arch- Sentinel	PPR	6800	\$9.35	\$2.50	\$9.00	\$2.00	\$6.80	\$1.92	\$0.00	active underground mine
Humphrey	Silt	97982	\$19.83	\$2.50	\$7.36	\$2.00	\$7.52	\$1.69	\$0.00	mine refuse site

- a The annual tonnage of waste coal used to derive the "All-in Cost \$/MMBTu"
- b The projected annual FOB mine cost in \$/ton of the waste coal (exclusive of loading and handling) calculation
- c The projected annual cost in \$/ton of loading and handling of the waste coal
- d The projected annual cost in \$/ton of trucking the waste coal to the plant.
- e The projected annual cost in \$/ton of handling/processing the waste coal (if different and in addition to the cost in (c) above
- f The projected annual cost of limestone in \$/ton of waste coal
- g The projected annual cost of ash disposal in \$/ton of waste coal
- h Any other fuel-related cost in \$/ton that is not not provided for in the above items

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**PSC STAFF FIRST DATA REQUEST OF AMBIT
AMERICAN BITUMINOUS POWER PARTNERS, L.P.
AND MONONGAHELA POWER COMPANY
P.S.C. CASE NO. 17-0631-E-P**

**Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.**

To Testify: Herb Thompson

Date Prepared: August 7, 2017

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REQUEST NO. 1.2:

For each of the Sources listed in [sic] as “Exhibit 4-1: Sources of Fuel for Grant Town”, please indicate:

- a. Sources involving waste coal from active strip mines.
- b. Sources involving waste coal from active underground mines.
- c. Sources involving abandoned mine refuse sites.

RESPONSE NO. 1.2:

Response 1.1-Attachment A

**PSC STAFF FIRST DATA REQUEST OF AMBIT
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Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.3:

On Exhibit JPM-2, Page 9 of 25 attached to the testimony of John P. Mustonen, under section 2.2.4 Fuel, the report states that “On the order of 53% of the fuel is currently sourced from active strip mines or abandoned mine refuse sites owned by, permitted by, and mined by Grant Town. The balance of fuel is supplied under contract from five different sites as described later”.

- a. Please identify the five sites and the owner(s) of the fuel supply.
- b. Does Grant Town **own** active strip mines as this statement indicates?
- c. Does Grant Town **own** abandoned mine refuse sites as this statement indicates?
- d. If Grant Town owns active strip mines and abandoned refuse sites, does Ambit make payments to itself for owned supplies it consumes?

RESPONSE NO. 1.3:

- a. The five sites that provide fuel under contract are as follows: Site (owner)

Humphrey Silt (LP Mineral), Humphrey Strip (LP Mineral), Ralph Six Strip Mine (LP Mineral), Barrackville Strip Mine (Transcon), and the Arch Sentinel (Arch Coal Company).
- b. AmBit does not own active strip mines.
- c. Yes, AmBit owns abandoned mine refuse sites.
- d. No. AmBit does not make payments to itself for owned supplies it consumes.

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Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.4:

Please provide a copy of the Waste Fuel Services Agreement between Enersystems, Inc. and AmBit, dated April 1, 2013, and revised on September 29, 2015, as referenced in Exhibit JPM-2, Page 17 of 25.

RESPONSE NO. 1.4:

Attached as Response 1.4-Attachment A is the April 1, 2013 Service Order. Further, attached as Response 1.4-Attachment B is an unsigned September 29, 2014 (not September 29, 2015 Service Order as referenced in Exhibit JPM-2) Service Order. Finally, attached as Response 1.4-Attachment C is an executed October 6, 2014 Service Order revising the April 1, 2013 Service Order.

The attached documents are CONFIDENTIAL and are being provided to Staff and WVEUG pursuant to the terms of the Protective Agreement each has entered into with AmBit and Monongahela Power Company.

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AMERICAN BITUMINOUS POWER PARTNERS, L.P.
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P.S.C. CASE NO. 17-0631-E-P**

**Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.**

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.5:

Please provide a copy of the EnerSystems Material Handling Agreement dated April 1, 1999, as referenced in Exhibit JPM-2, Page 17 of 25.

RESPONSE NO. 1.5:

See attached Attachment 1-5.

The document is CONFIDENTIAL and is being provided to Staff and WVEUG pursuant to the terms of the Protective Agreement each has entered into with AmBit and Monongahela Power Company.

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Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.6:

Please provide a copy of the Waste Fuel Services Agreement between Arch Coal Sales Company, Inc. and AmBit dated November 9, 2016, as referenced in Exhibit JPM-2, Page 17 of 25.

RESPONSE NO. 1.6:

See attached Attachment I-6. The actual date of the Agreement is November 8, 2016, rather than the November 9, 2016 date referenced in Exhibit JPM-2, Page 17 of 25.

The document is CONFIDENTIAL and is being provided to Staff and WVEUG pursuant to the terms of the Protective Agreement each has entered into with AmBit and Monongahela Power Company.

**PSC STAFF FIRST DATA REQUEST OF AMBIT
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Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.7:

Please provide a copy of the Savage Transportation Services Agreement, dated August 16, 2011 and amended October 17, 2014, as referenced in Exhibit JPM-2, Page 17 of 25.

RESPONSE NO. 1.7:

See attached Attachment 1-7. The amendment thereto is dated October 27, 2014, rather than the October 17, 2014, date reference in Exhibit JPM-2, Page 17 of 25.

The document is CONFIDENTIAL and is being provided to Staff and WVEUG pursuant to the terms of the Protective Agreement each has entered into with AmBit and Monongahela Power Company.

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P.S.C. CASE NO. 17-0631-E-P**

**Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.**

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.8:

Please provide a copy of the Amended and Restated Limestone Sales Agreement between Greer Industries, Inc. and Ambit dated January 1, 2014, as referenced in Exhibit JPM-2, Page 17 of 25.

RESPONSE NO. 1.8:

See attached Attachment I-8.

The document is CONFIDENTIAL and is being provided to Staff and WVEUG pursuant to the terms of the Protective Agreement each has entered into with AmBit and Monongahela Power Company.

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Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.9:

Please provide a copy of any currently effective fuel supply agreements between Ambit and any supplier of waste coal.

RESPONSE NO. 1.9:

There are currently two fuel supply agreements between AmBit and suppliers for waste coal:

1. See Response 1.4 for a copy of the Waste Fuel Agreement between AmBit and Enersystems, Inc. dated April 1, 2013 and revised September 29, 2014.
2. See Response 1.5 for a copy of an Enersystems Material Handling Agreement dated April 1, 1999 between AmBit and EnerSystems, Inc. and Transcon, Inc. Attached hereto as Response No. 1.9 -Attachments A, B and C are 2003, 2004 and 2013 amendments to the April 1, 1999 agreement.

The documents are CONFIDENTIAL and are being provided to Staff and WVEUG pursuant to the terms of the Protective Agreement each has entered into with AmBit and Monongahela Power Company.

**PSC STAFF FIRST DATA REQUEST OF AMBIT
AMERICAN BITUMINOUS POWER PARTNERS, L.P.
AND MONONGAHELA POWER COMPANY
P.S.C. CASE NO. 17-0631-E-P**

Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.10:

Please define the terms “Non-Commercial Mineral - NCM” and “Prep Plant Rejects - PPR” as referenced in “Exhibit 4-1: Sources of Fuel for Grant Town”.

RESPONSE NO. 1.10:

AmBit defines the term “Non-commercial Mineral – NCM” as a mined material that has not been processed after being extracted from its naturally occurring location. We identify these materials to be from “active mines” and are waste coal materials. These are typically all or portions of low quality strip minable coal seams.

AmBit defines the term “Prep Plant Rejects – PPR” as rejected materials resulting from the beneficiation process of raw coal in a coal preparation facility.

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**Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.**

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.11:

For other sources of fuel supply that involve Non-Commercial Mineral and Prep Plant Rejects from active mine sites, what would happen to the tonnage of waste coal should Ambit not utilize the material at the Grant Town plant?

RESPONSE NO. 1.11:

This question calls for speculation. AmBit does not know the answer.

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P.S.C. CASE NO. 17-0631-E-P**

Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.12:

AmBit's Response 2 to the Sierra Club's First Discovery Request, Attachment A, provides a listing of Fuel Sources. Please identify which of the sources on Attachment A correlate to the six (6) named sources listed on "Exhibit 4-1: Sources of Fuel for Grant Town" as contained on Exhibit JPM-2, Page 17 of 25?

RESPONSE NO. 1.12:

Fuel sources listed in Exhibit 4-1 as contained within Exhibit JPM-2 and corresponding fuel sources included in Attachment A to the Sierra Club's First Discovery Request are as follows:

<u>Exhibit 4 -1 Source Fuel</u>	<u>Corresponding Source Fuel from Attachment A</u>
Barrackville CG	Barrackville Gob
Farmington CG	Idamay Gob
Farmington Silt	Idamay Silt
LP Mineral NCM	Ralph Six, Humphrey Strip, Barrackville Strip
Arch – Sentinel PPR	Arch
Humphrey Silt	Humphrey Fines

**PSC STAFF FIRST DATA REQUEST OF AMBIT
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AND MONONGAHELA POWER COMPANY
P.S.C. CASE NO. 17-0631-E-P**

Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.13:

AmBit's Response 2 to the Sierra Club's First Discovery Request, Attachment A, provides a listing of Fuel Sources. On Exhibit JPM-2, Page 6 of 25, the report says project controlled sites include Grant Town, Barracksville, Rachael, Farmington and Ownings. Please identify which of the listed sources on Attachment A are the same as:

- a. Grant Town
- b. Barracksville
- c. Rachael
- d. Farmington
- e. Ownings

RESPONSE NO. 1.13:

Exhibit JPM-2 Sites

**Corresponding Source Fuel
from Attachment A**

Grant Town

Not Listed – information for Attachment A was back to 2008; usable fuel is exhausted

Barracksville

Barrackville Fines, Barrackville Gob

Rachael

Not Listed – information for Attachment A was back to 2008; usable fuel is exhausted

Farmington

Idamay Silt, Idamay Gob

Ownings

Not listed – no usable fuel located on this property

**PSC STAFF FIRST DATA REQUEST OF AMBIT
AMERICAN BITUMINOUS POWER PARTNERS, L.P.
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P.S.C. CASE NO. 17-0631-E-P**

Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.14:

The following questions are with reference to the information supplied in AmBit's Response 2 to the Sierra Club's First Discovery Request, Attachment A.

- a. Attachment A shows an estimated 140,000 tons coal of gob is projected to be sourced in 2017 from the active Barracksville mine. Who owns, or has rights to these tons of gob? What is the current FOB source price for these fuel supplies?
- b. Attachment A shows an estimated 30,000 tons of silt is projected to be sourced in 2017 from the Idamay source. Who owns, or has rights to these tons of silt? What is the current FOB source price for these fuel supplies?
- c. Attachment A shows an estimated 140,000 tons of silt is projected to be sourced in 2017 from the active Humphreys site. Who owns, or has rights to these tons of silt? What is the current FOB source price for these fuel supplies?
- d. Attachment A shows an estimated 115,000 tons of active mine rejects are projected to be sourced in 2017 from the active Ralph Six mine. Who owns, or has rights to these tons of mine rejects? What is the current FOB source price for these fuel supplies?
- e. Attachment A shows an estimated 6,000 tons of active mine rejects are projected to be sourced in 2017 from the active Humphreys strip mine. Who owns, or has rights to these tons of mine rejects? What is the current FOB source price for these fuel supplies?

Continued On Next Page

**PSC STAFF FIRST DATA REQUEST OF AMBIT
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P.S.C. CASE NO. 17-0631-E-P**

REQUEST NO. 1.14: [continued]

f. Attachment A shows an estimated 30,000 tons of active mine rejects are projected to be sourced in 2017 from the active Barracksville strip mine. Who owns, or has rights to these tons of mine rejects? What is the current FOB source price for these fuel supplies?

g. Attachment A shows an estimated 70,000 tons of active mine rejects are projected to be sourced in 2017 from the active Arch mine. Who owns, or has rights to these tons of mine rejects? What is the current FOB source price for these fuel supplies?

RESPONSE NO. 1.14:

The response to Request No. 1.14 is CONFIDENTIAL and is being provided to Staff and WVEUG pursuant to the terms of the Protective Agreement each has entered into with AmBit and Monongahela Power Company.

**PSC STAFF FIRST DATA REQUEST OF AMBIT
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Prepared By: Herb Thompson
Manager – Support Services
American Bituminous Partners, L.P.

To Testify: Herb Thompson

Date Prepared: August 7, 2017

REQUEST NO. 1.15:

Please explain what the term “Silt Destocking” means.

RESPONSE NO. 1.15:

The term “Silt Destocking” refers to the removal of silt material from a stock pile located on the facility property to the fuel processing area of the facility in advance of blending and processing to the power plant fuel day storage bins. This process includes the loading and transport of this material from the stock pile to the fuel processing area of the facility.

VERIFICATION

STATE OF WEST VIRGINIA,

COUNTY OF KANAWHA, to-wit:

Robert R. Rodecker, after first being duly sworn upon his oath, states that he is counsel to American Bituminous Partners, L.P. ("AmBit"), and that he is responsible for the assembling of the foregoing responses of various individuals to the Staff's First Data Request of AmBit, and that to the best of his knowledge, information and belief, said responses are true and correct.



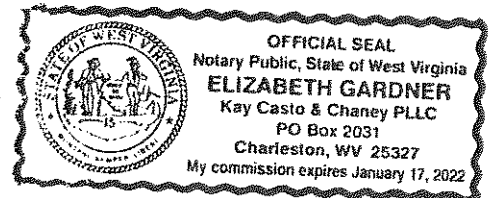
Robert R. Rodecker

Taken, sworn to and subscribed before me this 7th day of August, 2017.

My commission expires January 17, 2022.



NOTARY PUBLIC



CERTIFICATE OF SERVICE

I, Robert R. Rodecker, counsel for American Bituminous Power Partners, L.P., do hereby certify that copies of the foregoing American Bituminous Power Partners, L.P.'s Responses to Staff's First Data Request of AmBit have been electronically served upon the following parties via e-mail on this 7th day of August, 2017:

CONFIDENTIAL VERSION:

John Auville, Esquire
Legal Division
Public Service Commission
of West Virginia
Post Office Box 812
Charleston, West Virginia 25323
jauville@psc.state.wv.us

COUNSEL FOR WVEUG:

Derrick P. Williamson, Esquire
Barry A. Naum, Esquire
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

PUBLIC VERSION:

COUNSEL FOR SIERRA CLUB:

Evan D. Johns, Esq.
Appalachian Mountain Advocates
415 Seventh Street, Northeast
Charlottesville, VA 22902
ejohns@appalmad.org

Mike Becher, Esquire
Appalachian Mountain Advocates
Post Office Box 11571
Charleston, WV 25339
mbecher@appalmad.org

COUNSEL FOR CONSUMER ADVOCATE DIVISION:

Heather B. Osborn, Esquire
Consumer Advocate Division
700 Union Building
723 Kanawha Boulevard, East
Charleston, West Virginia 25301
hosborn@cad.state.wv.us



Robert R. Rodecker