WILLIAM V. DEPAULO, ESQ.

June 28, 2007

Sandra Squire Executive Secretary Public Service Coininission of West Virginia 201 Brooks Street Charleston, West Virginia 25301

RE: TRANS ALLEGHENY INTERSTATE LINE COMPANY CASE NO. 07-0508-E-CN

Dear Ms. Squire:

I have enclosed for filing in the above-captioned case, an original and 12 (twelve) copies of a Petition to Intervene for the Sierra Club. Copies have been served upon all parties of record.

Please call me if you have any questions regarding this filing.

Very truly yours,

William V. DePaulo

Enclosures

cc: All parties of record

PUBLIC SERVICE COMMISSION OF WEST VIRGINIA

CHARLESTON

TRANS-ALLEGHENY INTERSTATE LINE COMPANY

Application for a Certificate of Convenience and Necessity 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. 07-0508-E-CN

PETITION TO INTERVENE OF THE SIERRA CLUB

- 1. Pursuant to Rule 12.6 of the Commission's Rules of Practice and Procedure, the Sierra Club, Inc. hereby petitions to intervene in this proceeding on behalf of its members and electric consumers in West Virginia.
 - 2. The name and address of the Sierra Club's attorney is:

William V. DePaulo, Esq. #995 179 Summers Street, Suite 232 Charleston, West Virginia 25301 Tel: 304-342-5588 Fax: 304-342-5505 william.depaulo@gmail.com

- 3. Trans-Allegheny Interstate Line Company ("Trans-Allegheny") is a public utility engaged in the business of providing electric service in the State of West Virginia and is subject to Chapter 24 of the West Virginia Code, and the provisions thereof applicable to public utilities.
- 4. The Sierra Club, Inc. (hereafter "Sierra Club"), founded by John Muir in 1892, is among the oldest environmental organizations in the United States and is dedicated to the preservation of America's natural heritage. The Sierra Club is a non-profit, California corporation with a national membership that includes approximately 1,800 citizens of the state of West Virginia.

- 5. Trans-Allegheny is a wholly-owned subsidiary of Allegheny Energy Transmission, LLC, which is in turn a wholly-owned subsidiary of Allegheny Energy, Inc. Trans-Allegheny is seeking a certificate of convenience and necessity authorizing the construction and operation of a 500 kV electric transmission line and associated facilities to be constructed in West Virginia, Pennsylvania, Virginia, and possibly Maryland. The proposed transmission line would cross thousands of acres of unspoiled land in West Virginia, including lands essential to preservation of biodiversity and, on information and belief, lands utilized by members of the Sierra Club and citizens of the State of West Virginia for hiking and other outdoor activities.
- 6. The activities to be authorized by the requested certificate include a significant potential for adverse effects on the members of the Sierra Club, the citizens of West Virginia generally, and energy consumers in particular. The proposed transmission line may jeopardize the economic viability of utilities providing electricity to citizens of West Virginia, including Trans-Allegheny's parent corporations, and cause consumers of electricity to incur an unreasonable risk of increase rate hikes. Additionally, the proposed transmission line may cause a dramatic increase in air pollution from Allegheny's power plants, an increase in adverse impacts from coal mining generally, and an overall increase in emissions of greenhouse gases. Furthermore, construction of the proposed transmission line would conflict with the nationally recognized need for energy efficiency and conservation, and would compete for scarce financial resources available for renewable energy efforts.
- 7. The Sierra Club requests relief in the form of an order denying the requested certificate of necessity and convenience. The Sierra Club's intervention engages issues pertinent to the issues already before the Commission, and will not unduly broaden this proceeding.

WHEREFORE, the Sierra Club respectfully requests that its Petition to Intervene in this proceeding be granted.

Respectfully submitted,

THE SIERRA CLUB

By Counsel

William V. DePaulo, Esq. #995 179 Summers Street, Suite 232 Charleston, West Virginia 25301

Tel: 304-342-5588 Fax: 304-342-5505

william.depaulo@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition to Intervene of the Sierra Club was served on the following parties of record by First Class, U.S. Mail, postage pre-paid this 28th day of June, 2007:

Christopher L. Callas, Esq.
John Philip Melick, Esq.
Talal B. Husn, Esq.
Counsel, Trans-Allegheny Interstate Line Company
Jackson Kelly
PO Box 553
Charleston, WV 25322

Elisabeth H. Rose, Esq.
Laurel Run Community Watershed Association
Rose Padden & Petty, L.C.
PO Box 1307
Fairmont, WV 26555-1307

Susan J. Riggs, Esq.
Counsel, West Virginia Energy Users Group
Spilman Thomas & Battle
PO Box 273
Charleston, WV 25321-0273

Don E. Corwin Jr.
Intervenor, Halleck/Triune Community
PO Box 2129
Westover, WV 26502

Alan and Julie Sexstone Intervenors 181 Paul Davis Road Independence, WV 26374

Timothy L. Hairston Intervenor I.B.E.W. Local 2357 197 Marshall Avenue Westover, WV 26501 Billy Jack Gregg, Esq.
Director, Consumer Advocate Division
7th Floor Union Bldg
723 Kanawha Blvd East
Charleston, WV 25301

Susan C. Capelle and Samuel E. Dyke Intervenors Rt 1 Box 259 Independence, WV 26374

Ladd Williams Angie Williams Intervenors Route 2, Box 214C Tunnelton, WV 26444

Mark Sullivan and Julie Sullivan Intervenors Route 1 Box 282 Independence, WV 26374

> Letty Butcher, Intervenor PO Box 732 Reedsville, WV 26547

William Peterjohn and Susan Olcott Intervenors 305 Paul Davis Road Independence, WV 26374

William V. DePaulo

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