

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

THE SIERRA CLUB'S RESPONSE TO
TRANS-ALLEGHENY INTERSTATE LINE COMPANY'S
DISCOVERY REQUESTS (FIRST SET)

The Sierra Club responds to the first discovery request of the Trans-Allegheny Interstate Line Company ("TrAILCo") as follows:

Interrogatories

1. Identify each person whom you expect to call as an expert witness at the hearing of this case, state the subject matter on which the person is expected to testify, and state the substance of the facts and opinions to which the person is expected to testify and a summary of the grounds for each opinion.

RESPONSE: The Sierra Club has not selected any individual to act as an expert witness in this proceeding as of the date of this response, but will promptly update this response if and when any such selection is made.

2. For each person identified in your response to Interrogatory # 1, identify by tribunal and case style or other comparable designation each civil action, regulatory proceeding, or administrative docket in which the person has opined (including in summaries prepared by

counsel) or testified (including in prefiled testimony, whether or not ultimately sponsored) on (i) any of the subject matters identified in your response to Interrogatory # 1 or (ii) electric transmission.

RESPONSE: Not applicable.

3. For each person identified in your response to Interrogatory # 1, identify by publication name and date each article authored or co-authored by the person that concerns (i) any of the subject matters identified in your response to Interrogatory # 1 or (ii) electric transmission.

RESPONSE: Not applicable.

4. For each person identified in your response to Interrogatory # 1, identify each document reviewed by the person that concerns each such opinion.

RESPONSE: Not applicable.

5. For each person identified in your response to Interrogatory # 1, identify each document relied upon by the person for each such opinion.

RESPONSE: Not applicable.

6. For each person identified in your response to Interrogatory # 1, provide a current *curriculum vitae* and, if not specified therein, specify the academic and other qualifications (including work history) (i) for each subject on which the person is expected to testify and (ii) with respect to electric transmission.

RESPONSE: Not applicable.

Requests for Production

Please provide copies of, or make available for inspection, the following documents in your possession, custody, or control:

1. Your communications with each person identified in your response to Interrogatory # 1 that concern the subject matter(s) to be addressed or the substance of any opinion(s) to be offered.

RESPONSE: Not applicable.

2. Each opinion or testimony identified in your response to Interrogatory # 2.

RESPONSE: Not applicable.

3. Each document identified in your response to Interrogatory # 3.

RESPONSE: Not applicable.

4. Each document identified in your response to Interrogatory # 4.

RESPONSE: Not applicable.

5. Each document identified in your response to Interrogatory # 5.

RESPONSE: Not applicable.

6. Each document identified in your response to Interrogatory # 6.

RESPONSE: Not applicable.

THE SIERRA CLUB, INC.

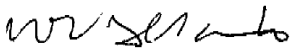
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CERTIFICATE OF SERVICE

I certify service of this discovery response by US mail October 2, 2007, to the following:

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