

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Anderson, Peter
Date Received: 08/07/2026

26-0633-E-G1

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I am 60 years old and am paying my own electric bill for the first time. My local power company has had problems in the area over the last week where we had 3 power surges and then a major blackout that lasted over an hour. We need reliable cheap and safe power sources. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Anderson, Peter
1004 John Norman St, Charleston 25301-1258, wvrnsson@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Anthony, Rosanna
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: Hello, West Virginians are already paying too much for electricity, and now the Public Service Commission (PSC) is considering rules that could make our bills even higher. Why would you EVEN consider another Rate hike? DON'T YOU CARE ABOUT THE ELDERLY WE CANNOT AFFORD ANOTHER INCREASE IN OUR MONTHLY BILL. WE ALREADY HAVE TO CHOOSE BETWEEN FOOD AND UTILITIES AND MEDICINE. WE NEED YOU TO MAKE GOOD DECISIONS FOR US. WE NEED YOU TO CONSIDER WHAT YOUR DECISIONS WILL DO TO US STOP GIVING THESE UTILITIES MORE MONEY. - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Anthony, Rosanna
338 Anniston Dr, Point Pleasant 25550-2153, anthony7453@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Attfield, Michael

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Attfield, Michael

28 Irish Rd, Morgantown 26501-7809, mdattfieldj@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Attfield, Michael

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Attfield, Michael

28 Irish Rd, Morgantown 26501-7809, mdattfieldj@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Bapat, Mona

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Bapat, Mona

20 West St, Westover 26501-4440, monabapat@hotmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Barrett, Tammy
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Barrett, Tammy
1250 Farrow Hill Rd, Davisville 26142-8107, rodtammy77@hotmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Bean, F

Date Received: 08/10/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Bean, F

525 Depot St, Romney 26757-1300, dispatcher9ww@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Bisset, Bill

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Bisset, Bill

224 Longview Estates Loop, Maxwelton 24957-8026, brat24@verizon.net

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Boggs, Deborah

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Boggs, Deborah

71 Canyon Creek Dr, Moundsville 26041-5070, boggsdeborah52@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Bolton, Charles

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Bolton, Charles

1329 Madison Ave, Huntington 25704-2458, 1u210eajj@mozmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: bowles, jerry

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

bowles, jerry

218 Chestnut Farm Ln, Lewisburg 24901-9055, jsmallwood2@frontier.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Bruns, Nancy

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Bruns, Nancy

816 Kanawha Blvd E, Charleston 25301-2838, npbruns@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Burnside, Bernard

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Burnside, Bernard

3109 Laurel Park Rd, Clarksburg 26301-6899, Bernardburnside@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Cale, Debra

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Cale, Debra

1711 16th Ave, Parkersburg 26101-8500, debbiecale101@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Cale, Debra

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Cale, Debra

1711 16th Ave, Parkersburg 26101-8500, debbiecale101@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Chamberland, Bob

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Chamberland, Bob

223 Mossy Rdg, Greenville 24945-7161, robertjchsage@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: cho, AJ

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

cho, AJ

159 Santa Teresa, San Leandro 94579-1963, amenoartemis@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Clister, Judith

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Clister, Judith

640 Bolyard Rd, Bruceton Mills 26525-6770, weebname@frontiernet.net

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Cloud, Jarrett

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Cloud, Jarrett

119 Brooklyn Stanhope Rd, Stanhope 07874-2508, jarretcloud09@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Corwin-Roach, Stan

Date Received: 08/07/2026

Dear Public Service Commission,

The first word in your name is PUBLIC. So I have reason to believe the PSC was created to insure utility companies don't abuse the great power they have and that they operate in a way that serves the public. Big commercial users are not the public. The public is you and I, living breathing people. With that in mind I'm requesting that the PSC revise the proposed rules to reflect:

- Utility-owned power plants should run only if they are less expensive to run than other options.
- If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid.
- Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers.
- The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost.

I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Corwin-Roach, Stan

217 Dancing Leaf Dr, Martinsburg 25403-1113, stancr56@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Cottrell, Dinah

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Cottrell, Dinah

163 Oak St, Daniels 25832-9659, cottrelldinah@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: CULLEN, TOM

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

CULLEN, TOM

2129 Keister Rd, Lewisburg 24901-5361, Craic@frontier.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Davis, Patricia

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Davis, Patricia

729 Scary Crk, Hamlin 25523-9501, wvpiggal@zoominternet.net

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Degen, Tom

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Degen, Tom

199 Greenwood Ln, Chloe 25235-7632, degen@frontiernet.net

Subject: Put Ratepayers First in HB2014 Rulemaking

From: DeProspero, Kim

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

DeProspero, Kim

628 Madigan Ave, Morgantown 26501-6716, kim8940@comcast.net

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Di Bartolomeo, Lisa

Date Received: 08/06/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Di Bartolomeo, Lisa

265 Morris St, Morgantown 26501-7543, lisa.m.dibartolomeo@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Difante, Diane
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Difante, Diane
300 Ashley Dr, Shepherdstown 25443-4612, dvelmad505@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Dittrich, Charles

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Dittrich, Charles

3 Williamsburg Cir, Wheeling 26003-5568, cwdittrich@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Doyle, John

Date Received: 08/07/2026

Dear Public Service Commission,

The people of West Virginia are the people you are tasked to serve as Public Service Commissioners. The proposed economic adventures, data centers, fossil fuel power plants and the accompanying degradation of our air, water, communities and land are serious concerns. They are so serious that the public should be seeing energetic action by the public service Commission to represent the general public interest but we rarely if ever see that. All new proposals that come before the commission should utilize the best known technologies to prevent disruption, pollution and degradation of the world we live in, and they should include realistic bonding requirements for completion, safe and community positive operation and reclamation. I would like the Commissioners to ask the following question of all new ventures under your jurisdiction: How will this project help the poorest, most polluted, least enfranchised communities within the area of the proposal. Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Doyle, John

281 Baker Ln, Charleston 25302-2937, jdoyle952@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Geelhaar, John

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Geelhaar, John

2430 Little Buck Run, New Milton 26411-6149, oldseaman@frontier.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Gillispie, Dannie

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Gillispie, Dannie

54 Putnam Ave, Culloden 25510-7478, danniegillispie@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Gioulis, Olga

Date Received: 08/10/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Gioulis, Olga

816 Old Womans Run, Sutton 26601-3249, olgagioulis@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Glaspey, Matt

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Glaspey, Matt

1103 1st Ave, Charleston 25302-1423, tinalouisejunkmail@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Glick, Art

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Glick, Art

638 Glicks Rd, Renick 24966-6601, art@almostheaven.net

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Greenhalgh, Diana
Date Received: 08/10/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Greenhalgh, Diana
2051 Red Lick Rd, New Milton 26411-6239, diana12759@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Griffith, Gina

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I manage The Jubilee Emergency Assistance Fund which is how St Albans churches try to help our citizens keep their power on. In the past, AEP has raised rates 'by only' around \$20.00 a month for the average residential customer. Then they do this again, and again, and again, so that now many of our neighbors, who live on limited incomes, can no longer afford this basic need of life. Don't do this again! AEP continues to turn a profit for their shareholders. Its long past time for AEP customers to stop paying for the profit of others when they can no longer heat their own homes, cook their own food, or protect their family members!! I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers. Isn't that what you are supposed to do? To protect your citizens from a local monopoly exploiting their literal power? I call your commission The (air quotes) 'So- Called' Public Service Commission. Who do you really work for? Do your job!

Sincerely,

Griffith, Gina

2718 Lakeview Dr, Saint Albans 25177-3460, ginadcg@att.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Huber, Paula

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Huber, Paula

1698 Forest Hills Dr, Vienna 26105-3312, scooby_26105@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Hudock, John
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Hudock, John
216 Gregory St, Weirton 26062-3043, jojo797@comcast.net

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Jarvis, Debra

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Jarvis, Debra

290 Tyler Way, Scott Depot 25560-9388, stillwatersmin@aol.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Keely, C

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Keely, C

1027 Valley Rd, Charleston 25302-3221, cyn_one2@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Kincaid, Emory
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Kincaid, Emory
114 Maplewood Rd, Lester 25865-9579, ekincaidjr@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Kinder, Brad

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Kinder, Brad

508 Spotswood Rd, Charleston 25303-2817, bigriverrecords@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Koon, Teresa

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Koon, Teresa

4112 Coopers Creek Rd, Charleston 25312-7889, teresa.m.koon@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Lawson, Betsy

Date Received: 08/07/2026

Dear Public Service Commission,

Why are fossil fuel owners always put ahead of the people who live here?

Coal extraction has trashed my neighborhood west of Morgantown, we all suffer the effects of air pollution from nearby coal plants like Ft. Martin and Longview, we are all suffering the effects of extreme weather due to fossil-fuel induced climate change, and, on top of that, we have to pay higher rates to keep coal coal plants running!! Where is the justice in this? When will West Virginia's leaders grow up and do the right thing? We must invest in our future, invest in clean energy, and put an end to using outdated and dangerous sources of energy. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Lawson, Betsy

1213 Gallus Rd, Morgantown 26501-7742, bjaegerart@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Levine, Yarrow

Date Received: 08/10/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Levine, Yarrow

249 Mollie Ln, Meadow Bridge 25976-7613, Yarrow1979@msn.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Lucion, Deana

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Lucion, Deana

PO Box 115, Roderfield 24881-0115, dluci87@outlook.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: lynch, Donald

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

lynch, Donald

3309 Central Ave, Parkersburg 26104-1831, mix4262@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Mace, Liane

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers. West Virginians should have the best utility bills since we provide so many out-of-staters with power. Companies take our resources, make a bundle but cry poor mouth because they don't know economics and we, the poor, are supposed to fund them. What's wrong with this picture? Sincerely, Liane

Mace

Sincerely,

Mace, Liane

854 Mckowns Crk, Walton 25286-8800, helios@pleiadiandreams.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Mahaney, Scott

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Mahaney, Scott

1111 E Penn Ave, Pennsboro 26415-1216, wwuscott@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Martin, Donna

Date Received: 08/07/2026

Dear Public Service Commission,

WE NEED RELIEF ON OUR ELECTRIC UTILITY BILLS! Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Martin, Donna

52 Vanatters Ck Rd, Ranger 25557, dmmartin@zoominternet.net

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Marts, Barry

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Marts, Barry

599 Poets Ln, Inwood 25428-4610, nonamemarts@fcomcast.net

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Matheny, Elaine

Date Received: 08/13/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Matheny, Elaine

11948 Longdale Rd, Letart 25253-9759, ecmatheny@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: McGovern, Luanne
Date Received: 08/13/2026

Dear Public Service Commission,

HB2014 - The worst thing that ever happened to the citizens of West
Virginia!

Sincerely,
McGovern, Luanne
858 Alta Rd, Charleston 25314-1810, Lmmcg32@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Mickey, Chris

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Mickey, Chris

614 E Grafton Rd, Fairmont 26554-5639, mickwv@msn.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Miller, Russell

Date Received: 08/09/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Miller, Russell

329 Sulpher Spgs, Alkol 25501-9418, millertruckinginc@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Mitchell, Rick
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Mitchell, Rick
183 Edison Dr, Culloden 25510, rm25705@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Morgan, Merri

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers. West Virginia has a very high proportions of people on fixed incomes, as well as many working people struggling to make ends meet. We simply cannot afford to have our power bills continue to climb.

Sincerely,

Morgan, Merri

PO Box 3, Greenville 24945-0003, merrismorgan@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Newbrough, Judith

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Newbrough, Judith

720 Fox Ave, Harrisville 26362-1104, judynewbro@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Park, Sara

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers. This state has continuously voted and acted in ways that chase growth and population away. While the cost of living remains affordable now, with an increase in utilities, younger generations will choose to leave and pursue lives and careers in other states that at least have things to offer - LGBTQ protections, national parks that are actually taken care of, wildlife that is protected, community that is built upon differences instead of the "good old day" crowd chasing people out who dare to show an ounce of individualism. Seniors and those facing poverty will also suffer, even further decreasing the work force of West Virginia, due to the strict regulations put in place by SNAP or Social Security that prevent recipients from having a job over (x) amount of hours. I implore you to please think of the people that are paying the bills of this state, the human lives that will be impacted from higher utility rates, to be the first line of defense against corporations that seek only profit from customers, not the health or prosperity of the people behind those bills.

Sincerely,
Park, Sara

201 Ballah Ave, Grant Town 26574, redhood911@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Parsons, DL

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Parsons, DL

3914 Washington Ave SE, Charleston 25304-2426, dloup48@duck.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Philipps, Justin

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Philipps, Justin

1385 Independence Ct, Newark 43055-3191, jphilipps1259@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Phipps, Rebecca

Date Received: 08/09/2026

Dear Public Service Commission,

Put the rate payers first, for a change. Don't make life more difficult for people, paying the bills, than it already is. Negotiate with the energy companies for a better deal for the people. Please revise the proposed rules to reflect:

- Utility-owned power plants should run only if they are less expensive to run than other options.
- If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid.
- Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers.
- The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost.

I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Phipps, Rebecca

205 Rocky St, Shepherdstown 25443-1587, beckhipps502@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Plitt, Jim

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers. For awhile now the PSC has pretty much just gone with what will assure profitability. Not the impact on citizens. Perhaps it is time to abolish the PSC and start over.

Sincerely,

Plitt, Jim

13288 Trout Run Rd, Wardensville 26851-8040, millmtclipper@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Preece, Frank And Joyce Kay
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Preece, Frank And Joyce Kay
348 Southfork Rd, Pecks Mill 25547-9043, frank44p@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Pullen, Cheryi

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Pullen, Cheryi

PO Box 1608, Shepherdstown 25443-1608, ccpullen@verizon.net

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Ramey, Charles

Date Received: 08/07/2026

Dear Public Service Commission,

Do you represent us? We spent more on electric than food! Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Ramey, Charles

1329 Madison Ave, Huntington 25704-2458, chuxtoo@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Raynes, Mary

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Raynes, Mary

52 Stuart St, Buffalo 25033, raynesm@frontier.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Reggi, Sarah

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Reggi, Sarah

92 Arrowhead Dr, Moundsville 26041-6001, scole_slp@hotmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Rice, Alecia

Date Received: 08/13/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Rice, Alecia

25941, Milton 25541, aleciarice@frontier.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Richards, Jessica

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Richards, Jessica

132 Patterson St, White Sulphur Springs 24986-4007, jessicarichards.wv@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Richardson, Trista

Date Received: 08/10/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Richardson, Trista

103 C St, Saint Albans 25177-1853, caligwinn@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Rivard, Betty

Date Received: 08/13/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Rivard, Betty

1532 Lee St E, Charleston 25311-2404, bettyrivard@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Rivers, Jerry

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Rivers, Jerry

8 Gombert Pl, Roosevelt 11575-1602, jerry.rivers13@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Roberts Wilson, Sally
Date Received: 08/13/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Roberts Wilson, Sally
54 Cheat Canyon Park Dr, Morgantown 26508-0008, sallyrobertswilson@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Runfola, steven

Date Received: 08/07/2026

Dear Public Service Commission,

Hello. I am a WV resident. Please revise the proposed rules to reflect: -

Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Runfola, steven

45 Park Ridge Dr, Morgantown 26508-4032, stevenrunfola@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Sands, Keith

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Sands, Keith

30 Turkey Ridge Rd, Romney 26757-7420, k435s@aol.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Scott, Amy

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Scott, Amy

16585 Frost Rd, Dunmore 24934-9002, scott9free@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Scott, Betsy

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Scott, Betsy

808 Lake Floyd Cir, Bristol 26426-7385, scottbetsy40@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Sears, Joseph

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Sears, Joseph

261 Mcberry St, Beckley 25801-3024, jksears81@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Sheffield, Carol

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Sheffield, Carol

297 Upper Childers Run Rd, Buckhannon 26201-3216, carshef3@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Simmons, Timothy
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Simmons, Timothy
1317 Quarrier St, Charleston 25301-3061, etim@mail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Sluss, Sherry
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Sluss, Sherry
1120 Ceres Rd, Bluefield 24701-6780, cookie24701@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Stonestreet, Richard
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Stonestreet, Richard
106 White St, Charleston 25302-4941, stonestreetrich@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Strasser, Robert

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Strasser, Robert

4 Woods Dr, Wheeling 26003-5463, rstrasser@mac.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Subrick, Jim

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Subrick, Jim

107 High St, Charleston 25311-1223, Jimsubrick@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Turchyn, Michael

Date Received: 08/07/2026

Dear Public Service Commission,

It's not right that our rates are so high, and our service so unreliable. I see lines with trees laying on them, and old dead trees about to fall on them. Whenever we have a thunderstorm we pretty much expect the power to go out. 30 years ago I lived in a much more remote spot and power outages were rare. Back then they kept their lines cleared. Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Turchyn, Michael

854 Mckowns Crk, Walton 25286-8800, fullspectrumglass@frontier.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Turchyn, Michael

Date Received: 08/07/2026

Dear Public Service Commission,

It's not right that our rates are so high, and our service so unreliable. I see lines with trees laying on them, and old dead trees about to fall on them. Whenever we have a thunderstorm we pretty much expect the power to go out. 30 years ago I lived in a much more remote spot and power outages were rare. Back then they kept their lines cleared. Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Turchyn, Michael

854 Mckowns Crk, Walton 25286-8800, fullspectrumglass@frontier.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Vance, Gail

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Vance, Gail

60 Lunsford Ln, Lesage 25537-2286, agv191@yahoo.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: von der Heydt, Kevin

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

von der Heydt, Kevin

4496 Big Draft Rd, White Sulphur Springs 24986-7074, kevin.vonderheydt@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Wadsworth, Andrew
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Wadsworth, Andrew
125 W 33rd St, Reading 19606-2905, andywadsworth23@hotmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Walden, Kay

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Walden, Kay

407 Maxwell St, Charleston 25311-2052, kaywalden4@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Williams, Carole
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Williams, Carole
2223 Heritage Pt, Morgantown 26505-3065, cwili22@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Williams, Rick

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Williams, Rick

183 Opekiska Rd, Fairmont 26554-8752, wwindivisibleteam55@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Willts, Sara

Date Received: 08/08/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Willts, Sara

72 Mount Grove Rd, Bruceton Mills 26525-5366, swilts@duck.org

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Wilts, Sara

Date Received: 08/10/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Wilts, Sara

72 Mount Grove Rd, Bruceton Mills 26525-5366, swilts@duck.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Winston, Virginia

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Winston, Virginia

117 Open Gate Ln, Shepherdstown 25443-4935, predawn-sorghum3m@icloud.com

Subject: Put Ratepayers First in HB2014 Rulemaking

From: Wolfe, Terry

Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Wolfe, Terry

1199 E 3rd St, Morgantown 26508-9706, tawinvestments@gmail.com

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Wright, Todd
Date Received: 08/07/2026

Dear Public Service Commission,

As a pastor, I see the impact that inflation is having on the members of the congregation - no matter where they are on the economic ladder. At the church we have installed solar panels, but that is not an option for everyone. Making rules that lead to higher electric bills, when there are cheaper options, makes no sense! Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Wright, Todd
4401 Staunton Ave SE, Charleston 25304-1743, twright@vcpresby.org

Subject: Put Ratepayers First in HB2014 Rulemaking
From: Zuckerman, Barry
Date Received: 08/07/2026

Dear Public Service Commission,

Please revise the proposed rules to reflect: - Utility-owned power plants should run only if they are less expensive to run than other options. - If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid. - Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers. - The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost. I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,
Zuckerman, Barry
1 Old Anvil Ln, Middletown 10940-2601, b_zuckerman@yahoo.com

01:20 PM AUG 19 2026 EXEC SEC DIV

Dear WV Public Service Commission Info,

Regarding case #26-0633:

When the WV Legislature adopted HB 2014 (the data center bill) they asked the West Virginia Public Service Commission to propose rules to maintain their power plants, but also said that utilities did not have to run if it would increase customer charges for electricity. The PSC has now proposed rules that are likely to increase electric bills for West Virginians if they are followed, and "expects" utilities to "self-schedule" their plants to run, even when cheaper electricity is available from the grid.

I am writing to ask you to request that you modify the proposed rules to make it clear that utilities should utilize the cheapest cost power. Utilities should not self schedule and use higher-cost power from their power plants, even if it means the utility-owned plants are not used as often. We cannot afford to subsidize power plants that can't compete.

The proposed rules would increase electric bills, if our utilities follow them.

Please revise the proposed rules to reflect:

- Utility-owned power plants should run only if they are less expensive to run than other options.
- If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid.
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- The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost.

I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Ms. CATHERINE GRANT

2001 WV Highway 5 E Glenville, WV 26351-7614 catfitz1990@gmail.com

09:20 AM AUG 20 2026 EXEC SEC DIV

Dear WV Public Service Commission Info,

Regarding case #26-0633:

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- The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost.

I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Dr Rose Lowther

1506 Grandview Dr Charleston, WV 25302-2438 lowtherberman@gmail.com

Dear WV Public Service Commission Info,

Regarding case #26-0633:

When the WV Legislature adopted HB 2014 (the data center bill) they asked the West Virginia Public Service Commission to propose rules to maintain their power plants, but also said that utilities did not have to run if it would increase customer charges for electricity. The PSC has now proposed rules that are likely to increase electric bills for West Virginians if they are followed, and "expects" utilities to "self-schedule" their plants to run, even when cheaper electricity is available from the grid.

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- Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers.
- The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost.

I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Mr. Larry Levine

253 Old Powell Rd Lewisburg, WV 24901-1813 larrylevinewv@gmail.com



August 20, 2026

Karen Buckley
Executive Secretary
Public Service Commission of West Virginia
201 Brooks Street
Charleston, WV 25301

Via Electronic Filing

Re: Case 26-0633-E-61
General Investigation into Adopting and
Implementing Rules Governing Electric
Generating Capacity Regulations

Dear Ms. Buckley:

The Gas and Oil Association of West Virginia (GO-WV) represents companies engaged in the exploration, production, processing, transportation and use of natural gas and oil, as well as the many businesses that support these industries across West Virginia. Collectively, the industry supports tens of thousands of West Virginia jobs, contributes billions of dollars to the state's economy, and generates significant state and local tax revenue that helps fund schools, infrastructure and essential public services.

On behalf of its members, GO-WV respectfully submits the following Response to Comments in the above-referenced proceeding concerning the Commission's proposed rulemaking pursuant to House Bill 2014 related to electric generation capacity.

GO-WV appreciates the opportunity to participate in this proceeding and respectfully requests that the Commission consider the issues and recommendations addressed in its filing.

Respectfully submitted,

Rebecca McPhail, President
Gas and Oil Association of West Virginia (GO-WV)

**PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON**

CASE NO. 26-0633-E-GI

**GENERAL INVESTIGATION INTO ADOPTING AND IMPLEMENTING
RULES GOVERNING ELECTRIC GENERATING CAPACITY
REGULATIONS**

**REPLY COMMENTS OF THE GAS AND OIL ASSOCIATION OF WEST
VIRGINIA**

The Gas and Oil Association of West Virginia ("GO-WV") respectfully submits these Reply Comments regarding the proposed Series 41, *Rules Governing Electric Generating Capacity Utilization* ("Proposed Rules").

GO-WV represents companies engaged in the exploration, production, transportation and development of West Virginia's natural gas and oil resources, together with businesses supporting those activities.

GO-WV supports the Legislature's objective of maintaining adequate dispatchable electric generation, ensuring reliable and affordable electricity for West Virginians, and maximizing the economic benefits associated with energy resources produced in West Virginia.

The comments filed in this proceeding reveal significant disagreement, however, regarding how those objectives should be implemented. Some commenters urge the Commission to strengthen the Proposed Rules to increase utilization of West Virginia's existing coal-fired generating fleet. Others contend

that provisions addressing capacity factors and self-scheduling could increase costs to ratepayers by encouraging generation when market economics do not support it.

GO-WV believes the Commission can reconcile these concerns by adhering closely to the language and purpose of W. Va. Code § 24-2-1d: encourage reliable in-state generation using West Virginia energy resources while preserving consumer economic dispatch and protecting ratepayers from unnecessary costs.

Most importantly, the final rule should recognize what is largely missing from the Proposed Rules and the comments filed to date: West Virginia natural gas is expressly part of the State's statutory generation policy and should be treated accordingly.

I. West Virginia's Statutory Generation Policy Includes Both Coal and Natural Gas

The Commission's July 20 Order recognizes that W. Va. Code § 24-2-1d was originally enacted to “maximize the use of electricity generated within the state by using coal or natural gas produced within the state.”

Several commenters understandably approach this proceeding from the perspective of West Virginia's existing coal-fired generation fleet. The West Virginia Coal Association (“WVCA”), for example, argues that the Proposed Rules are an important first step toward maximizing generation from existing coal plants

and urges additional requirements concerning plant upgrades and operation at higher capacity factors.

The United Mine Workers of America ("UMWA") similarly urges the Commission to strengthen the Proposed Rules to ensure greater utilization and longer operation of West Virginia coal-fired generating facilities.

GO-WV recognizes the important role coal generation plays in West Virginia's existing electric system and does not dispute the value of maintaining reliable dispatchable generation.

The statute, however, does not establish a coal-only generation policy. It expressly identifies both coal and natural gas produced within West Virginia as resources through which the State sought to maximize in-state electricity generation. The final rule should reflect that policy.

West Virginia is one of the nation's leading natural gas-producing states. Increased natural gas-fired electric generation represents an opportunity to convert more of that abundant resource into electricity here at home, creating additional in-state demand for West Virginia natural gas while adding modern dispatchable generating capacity capable of responding to changing electricity demand.

The Commission should therefore avoid interpreting HB 2014 or W. Va. Code § 24-2-1d as establishing a regulatory preference for one West Virginia fuel over another.

II. GO-WV Agrees That the 69-Percent Capacity Factor Is Not an Unconditional Operating Mandate

Several commenters raise concerns regarding Proposed § 5.3, which states that utilities are expected to maintain generation plants and schedule maintenance “to allow it to achieve a minimum capacity factor of sixty-nine (69%) percent,” with success measured over a twelve-month period.

APCo and WPCo correctly point to an important distinction in the statute: W. Va. Code § 24-2-1d(f) requires utilities to maintain thermal baseload generating units “to allow them to be able to” self-generate and achieve the specified capacity factor. The statute does not require those units actually to operate at 69 percent regardless of economics. That distinction is reinforced by the statute’s express protection that nothing requires operation at a 69-percent capacity factor when doing so would increase charges to customers.

The 69-percent provision should be understood principally as a generation readiness and maintenance standard, not an unconditional dispatch mandate. This interpretation is also consistent with the Consent Decree referenced by multiple commenters, under which the Commission agreed that it would not interpret a 69-percent capacity factor as establishing a minimum operational threshold.

The Commission should revise § 5.3 to remove any ambiguity on this issue. The final rule should state expressly that utilities must maintain thermal baseload generating resources so they are capable of achieving the statutory

capacity factor when economics, reliability and operational conditions warrant, but that the rule does not require uneconomic operation merely to reach a numerical target.

III. Self-Scheduling Should Be an Available Tool, Not a Regulatory Presumption

The record also raises legitimate concerns regarding Proposed §§ 4.4 and 5.3.2. APCo and WPCo explain that self-scheduling is an important operational tool but is used in limited circumstances for customer benefit, while economic dispatch remains the ordinary method of operation.

There may be circumstances in which self-scheduling a generating unit produces substantial benefits. Fuel inventories, operational limitations, reliability requirements, expected market conditions, start-up and shut-down costs, and other factors can make self-scheduling economically prudent. The Commission should preserve that flexibility.

But Proposed § 4.4 requires a utility to explain whenever it chooses not to self-schedule, while § 5.3.2 affirmatively states that utilities are expected to take advantage of PJM provisions permitting self-scheduling.

Read together, those provisions create at least the appearance of a regulatory presumption favoring self-scheduling. The final rule should instead be neutral.

Utilities should be expected to make dispatch decisions - including whether to self-schedule - based upon reliability, operational considerations and the total economic impact on West Virginia customers.

The Commission should require utilities to explain significant departures from consumer economic dispatch when appropriate, but it should not establish self-scheduling itself as the preferred outcome.

IV. The Commission Should Reject Both an “Always Run” and a “Never Self-Schedule” Approach

The initial comments tend to frame the dispatch issue from opposite directions. WVCA and UMWA emphasize the economic and reliability benefits associated with increased utilization of West Virginia's existing coal plants. Other commenters emphasize the potential losses associated with operating generating units when PJM market prices fall below their variable costs.

GO-WV does not believe the Commission needs to choose between them. There will be circumstances in which maximizing output from an existing West Virginia generating unit provides the lowest-cost electricity for customers. There will also be circumstances in which purchased power or another generating resource provides a lower total cost. The statute supplies the appropriate standard: consumer economic dispatch.

The Commission's Order describes consumer economic dispatch as operating generation facilities to produce electricity at the lowest cost while reliably meeting consumer demand and considering generation and transmission

limitations. The final rule should preserve that standard rather than substitute a predetermined preference for either maximum plant utilization or maximum reliance upon PJM economic dispatch.

V. Consumer Economic Dispatch Must Consider Total Cost

GO-WV agrees with commenters who caution against defining economic dispatch solely by examining the internal per-kilowatt-hour production cost of an individual generating unit. Proposed § 4.1 requires utilities to plan operation of each generating unit to produce electricity at the “lowest achievable cost per kilowatt hour.” Sections 4.3 and 4.3.1 similarly focus heavily upon whether higher output from an individual plant would lower that plant's unit production cost.

That analysis can provide useful information, but it does not necessarily answer the question the statute asks. The appropriate comparison is the total cost of reliably serving West Virginia customers. Such analysis should include, as appropriate, fuel costs, fuel transportation, purchased power alternatives, operations and maintenance expenses, ramping and cycling impacts, start-up and shut-down costs, transmission constraints, reliability requirements and relevant PJM market conditions.

Comments from APCo and WPCo illustrate the complexity of this calculation. Their PJM offers incorporate fuel costs, variable fuel transportation costs, emissions-related costs and variable operations and maintenance expenses, together with operational parameters such as start-up costs, start-up times and ramp rates.

The Commission should ensure that the final rule evaluates generation decisions on this comprehensive basis.

VI. Section 6 Should Be Revised to Recognize Natural Gas

Perhaps the clearest example of the Proposed Rules' unequal treatment of West Virginia energy resources appears in § 150-41-6, entitled "Management of Fuel Supplies and Contracts."

Despite that fuel-neutral title, the substantive provisions address almost exclusively:

- coal inventories;
- coal stockpiles;
- coal deliveries;
- coal consumption;
- coal price adjustments;
- coal solicitations; and
- coal contracting.

There is no comparable recognition of natural gas supply or transportation. That omission is difficult to reconcile with the Commission's own recognition that W. Va. Code § 24-2-1d was enacted to maximize electricity generated within West Virginia using coal or natural gas produced within the state.

APCo and WPCo suggest that natural gas-related reporting should be excluded because gas-fired units are generally economically dispatched. GO-WV agrees that the Commission should not simply impose coal-stockpile concepts on

natural gas generation. Natural gas supply is fundamentally different from coal inventory management. But exclusion is not the appropriate answer either.

If the Commission intends § 6 to provide meaningful information regarding the fuel supply supporting West Virginia's dispatchable generation fleet, natural gas should be appropriately recognized. For natural gas-fired facilities, relevant considerations may include fuel availability, transportation capacity, firm versus interruptible transportation arrangements, supply diversity and other factors affecting the ability of a generating facility to obtain fuel when needed.

Any reporting requirements should be tailored to natural gas operations, should avoid unnecessary duplication, and should protect commercially sensitive contractual information.

VII. Broader Economic Benefits Matter, But Ratepayers Should Not Be Required to Subsidize Uneconomic Dispatch

WVCA and UMWA appropriately identify broader economic benefits associated with West Virginia generation, including jobs, fuel production and economic activity in communities surrounding generating facilities. GO-WV strongly agrees that energy production creates economic benefits extending well beyond the power plant itself. That is equally true of natural gas.

Development of additional natural gas-fired generation in West Virginia can support upstream production, midstream infrastructure, construction, permanent plant employment, local tax bases and broader economic development while

creating a substantial new in-state market for West Virginia-produced natural gas.

Those benefits reinforce the value of policies encouraging more electricity generation in West Virginia. They should not, however, override the statute's express protection of electricity customers.

The best long-term policy is one that encourages West Virginia energy resources to compete to provide reliable electricity at the lowest reasonable total cost, not one that requires captive ratepayers to subsidize uneconomic operation of a particular generating resource.

VIII. The Final Rule Should Look Forward as Well as Backward

Much of the discussion in the initial comments understandably focuses on how existing generating plants have operated in recent years. The Commission should also consider what these rules mean for West Virginia's future generation fleet.

West Virginia faces growing demand for reliable electricity at the same time PJM continues to identify resource adequacy challenges. The State has an opportunity to respond by attracting investment in additional dispatchable generation. Natural gas-fired generation will be an important part of that response.

The regulatory framework adopted in this proceeding should therefore accommodate both the continued operation of economically competitive existing generation and investment in new dispatchable generation. Policies that

artificially favor incumbent generation technologies can discourage investment in newer, more efficient resources.

A fuel-neutral regulatory framework based upon reliability, affordability and consumer economic dispatch provides a stronger foundation for attracting the generation investment West Virginia will need.

IX. Conclusion

The comments filed in this proceeding demonstrate broad agreement on at least one fundamental point: West Virginia needs reliable electric generation capable of serving consumers at reasonable cost. The disagreement is not over whether West Virginia should generate more electricity, but rather how it should.

W. Va. Code § 24-2-1d provides the appropriate framework. West Virginia should maintain reliable generating resources, encourage economically beneficial in-state generation, protect customers from unnecessary costs, and recognize the value of energy resources produced within the State.

GO-WV therefore respectfully recommends that the Commission revise the Proposed Rules to:

1. Clarify that the 69-percent capacity factor is a maintenance and operational-readiness standard.

Affected Section: § 150-41-5.3 – Capacity Factor

The Proposed Rule currently provides that utilities should maintain their generation plants and schedule maintenance to allow achievement of a

“minimum capacity factor of sixty-nine (69%) percent,” and further provides that “success” will be measured by achieving that capacity factor.

GO-WV recommends replacing § 5.3 with the following:

§ 150-41-5.3. Capacity Factor. — *Each electric utility subject to the rate jurisdiction of the Commission shall maintain its thermal baseload generating units and reasonably schedule maintenance so that such units are operationally capable of self-generating and achieving a capacity factor of at least sixty-nine percent (69%), consistent with W. Va. Code § 24-2-1d(f).*

The sixty-nine percent (69%) capacity factor identified in this subsection is a maintenance and operational-readiness standard and shall not constitute a minimum operational or dispatch requirement.

Nothing in this rule shall require a utility to operate a generating unit at a sixty-nine percent (69%) capacity factor, or at any other specified capacity factor, when doing so would increase charges to West Virginia ratepayers, conflict with consumer economic dispatch, impair reliability, or be inconsistent with the operational limitations of the generating unit or transmission system.

The Commission may evaluate achieved capacity factors, together with maintenance history, outages, unit availability and other relevant information, as part of a holistic review of whether a generating unit has been reasonably and prudently maintained and operated.

This language more closely follows the distinction identified by APCo/WPCo between maintaining a unit so it is able to achieve the capacity factor and requiring actual operation at that level.

2. Remove the presumption in favor of self-scheduling.

Affected Sections: §§ 150-41-4.4 and 150-41-5.3.2

The Proposed Rule § 4.4 requires a utility to explain whenever it chooses *not* to self-schedule, while Proposed Rule § 5.3.2 states that utilities are “expected to take advantage” of PJM provisions allowing self-scheduling.

GO-WV recommends replacing § 4.4 with:

§ 150-41-4.4. Self-Scheduling and Economic Dispatch. — *A utility may self-schedule generation when, based upon information reasonably available at the time the decision is made, the utility determines that self-scheduling is expected to benefit West Virginia ratepayers or is appropriate due to reliability, fuel supply, operational, maintenance, unit commitment, transmission, market, or other relevant considerations.*

Neither self-scheduling nor reliance upon PJM economic dispatch shall be presumed to be the preferred method of operation.

When evaluating a utility's decision to self-schedule or economically dispatch a generating unit, the Commission shall consider the total expected cost to West Virginia ratepayers, reliability, unit operating characteristics, market conditions, fuel availability and other relevant circumstances existing at the time the decision was made.

The Commission may require a utility to explain material self-scheduling decisions or material departures from its ordinary economic-dispatch practices where such information is reasonably necessary to evaluate prudence and ratepayer impact.

GO-WV further recommends replacing the Proposed Rule § 5.3.2 with:

§ 150-41-5.3.2. — *Utilities shall reasonably evaluate opportunities available under applicable PJM rules, including economic dispatch and self-scheduling, and shall utilize the method of operation reasonably expected to provide reliable service at the lowest reasonable total cost to West Virginia ratepayers, taking into consideration unit operating characteristics and other relevant circumstances.*

Nothing in this subsection shall create a presumption that a generating unit should be self-scheduled for the purpose of achieving a particular capacity factor.

3. Define consumer economic dispatch using total cost to customers rather than an individual plant's production cost.

Affected Sections: §§ 150-41-4.1, 4.3 and 4.3.1

GO-WV recommends revising the latter portion of Proposed Rule § 4.1 as follows:

§ 150-41-4.1. Consumer Economic Dispatch. — *In accordance with W. Va. Code § 24-2-1d(e), the Commission shall review each generating unit's consumer economic dispatch to determine whether generation and market-purchase decisions are reasonably designed to produce reliable electricity at the lowest reasonable total cost to West Virginia ratepayers, consistent with*

consumer demand and the operational limitations of generation and transmission facilities.

Consumer economic dispatch shall not be determined solely by the average or incremental cost per kilowatt-hour of operating an individual generating unit at a particular output level.

In conducting its review, the Commission may consider, as applicable:

- fuel commodity costs;*
- fuel transportation and delivery costs;*
- purchased-power alternatives;*
- unit start-up and shut-down costs;*
- operations and maintenance costs;*
- costs associated with cycling and ramping;*
- emissions and other variable compliance costs;*
- transmission constraints;*
- unit availability and reliability;*
- fuel availability;*
- PJM day-ahead and real-time market prices;*
- anticipated unit operating conditions; and*
- other costs or operational considerations reasonably affecting the total cost of serving West Virginia customers.*

GO-WV recommends revising Proposed Rule § 4.3 to provide:

§ 150-41-4.3. Information on Consumer Economic Dispatch. — *Each Generation Dispatch Report required by this rule shall contain information reasonably necessary for the Commission to evaluate whether significant generation, self-scheduling and market-purchase decisions were consistent with consumer economic dispatch.*

The Commission's evaluation shall compare the total reasonable cost of alternative generation and purchase-power options available to the utility and shall not presume that increasing the output of an individual generating unit is economically preferable solely because doing so would reduce that unit's average cost per kilowatt-hour.

Section 4.3.1 should likewise be revised to make clear that maintenance and equipment impacts associated with ramping are among the factors considered in a total-cost comparison, rather than treated as justification for maximizing plant output standing alone.

4. Expressly recognize West Virginia natural gas alongside West Virginia coal.

Affected Sections: §§ 150-41-1.6 and 150-41-6

GO-WV recommends expanding Proposed Rule § 1.6, Intent, to provide:

§ 150-41-1.6. Intent. — *This rule is promulgated pursuant to W. Va. Code § 24-2-1d to implement the Commission's duties regarding electric generating capacity and consumer economic dispatch, consistent with the statutory policy of maximizing economically beneficial electricity generation within West Virginia*

*utilizing energy resources produced within the State, including **coal and natural gas**, while maintaining reliable service and protecting West Virginia ratepayers from unreasonable costs.*

GO-WV also recommends revising the title of Proposed Rule § 6 to read:

§ 150-41-6. Management of Coal and Natural Gas Fuel Supplies and Contracts.

The introductory provision should further provide:

§ 150-41-6.1. Fuel Supply Information. — *In evaluating the management of fuel supplies and contracts pursuant to W. Va. Code § 24-2-1d(e), the Commission shall recognize the differing commercial, operational, storage, transportation and delivery characteristics of coal and natural gas and shall tailor reporting requirements accordingly.*

Sections 6.1 through 6.4 relating to coal inventories, stockpiles and contracting may remain applicable to coal-fired generating facilities, subject to other revisions the Commission determines appropriate.

5. Add a natural-gas-specific fuel-supply provision.

New Section: § 150-41-6.5

GO-WV recommends adding:

§ 150-41-6.5. Natural Gas Fuel Supply and Transportation. — *For a natural gas-fired generating unit subject to this rule, the utility shall maintain reasonable fuel-supply and transportation arrangements consistent with the*

operational characteristics, anticipated utilization and reliability needs of the generating facility.

In evaluating natural gas fuel supply and transportation, the Commission may consider, as applicable:

6.5.1. *The availability and diversity of natural gas supply arrangements;*

6.5.2. *The availability and nature of interstate or intrastate pipeline transportation serving the generating facility;*

6.5.3. *The extent to which transportation arrangements are firm, interruptible or otherwise subject to contractual or operational limitations;*

6.5.4. *Material limitations affecting the ability of the generating facility to obtain natural gas during periods of expected high electricity demand or constrained pipeline conditions;*

6.5.5. *The manner in which natural gas commodity and transportation costs are incorporated into generation offers and consumer economic dispatch decisions; and*

6.5.6. *Other information reasonably necessary to evaluate the reliability and economic availability of natural gas supply to the generating facility.*

Nothing in this subsection shall require a utility to maintain physical inventories of natural gas or otherwise apply coal-stockpile requirements to natural gas-fired generating facilities.

Information regarding specific natural gas supply or transportation contracts that constitutes confidential business information, commercially sensitive

information or trade secrets shall be protected in accordance with § 150-41-8 and applicable law.

This is an important distinction because even APCo/WPCo's description of its PJM activities recognizes that natural-gas pricing changes daily and is incorporated into the information used to develop its market offers. The appropriate regulatory approach therefore should reflect those operational differences rather than simply treating natural gas as though it were stored in a coal pile.

6. Reduce unnecessary and duplicative reporting while preserving meaningful transparency.

Affected Sections: §§ 150-41-4.2 and 150-41-7

GO-WV does not recommend eliminating reporting requirements. Instead, the rule should distinguish between information that is useful on a monthly basis and information that can efficiently be reviewed through existing Commission proceedings.

GO-WV recommends adding to Proposed Rule § 4.2:

§ 150-41-4.2.1. — *To the extent information required by this rule is already provided to the Commission in another recurring report or proceeding, including an Expanded Net Energy Cost proceeding, the Commission may permit the utility to identify or incorporate that information by reference rather than require duplicative submission.*

§ 150-41-4.2.2. — *The Commission shall periodically review the scope and frequency of Generation Dispatch Reports and may consolidate, reduce or modify reporting requirements where the Commission determines that less frequent reporting will provide sufficient information to carry out its statutory responsibilities without materially reducing transparency or regulatory oversight.*

GO-WV further recommends adding the following to Proposed Rule § 7:

§ 150-41-7.1.4. — *In requesting additional information under this section, the Commission shall consider whether the information is already available through existing Commission filings or proceedings and shall, where practicable, avoid unnecessary duplication of information previously provided.*

§ 150-41-7.1.5. — *Reporting requirements imposed pursuant to this rule should be reasonably related to the Commission's statutory duties under W. Va. Code § 24-2-1d and structured so that the administrative costs of collecting, compiling and reviewing information do not unnecessarily increase costs to West Virginia ratepayers.*

This approach responds to the transparency concerns raised by WVCA and UMWA without ignoring the utilities' legitimate concern that the Proposed Rules create substantial new monthly reporting obligations.

7. Expressly preserve PJM market signals and operational flexibility.

New Section: § 150-41-4.5

GO-WV recommends adding:

§ 150-41-4.5. PJM Markets and Operational Flexibility. — *Nothing in this rule shall be interpreted to require a utility to disregard applicable PJM market prices, dispatch instructions, reliability requirements, tariffs, manuals, operating agreements or other binding market requirements.*

The Commission recognizes that PJM day-ahead and real-time energy markets provide relevant economic signals concerning the relative cost and availability of generation resources.

A utility shall retain reasonable operational discretion, consistent with applicable law and Commission oversight, to respond to PJM market conditions and to determine whether economic dispatch, self-scheduling or another permissible operating strategy is reasonably expected to provide the greatest overall benefit to West Virginia ratepayers.

The Commission's review of such decisions shall be based upon the information reasonably available to the utility when the operational decision was made and shall not presume imprudence solely because actual market conditions subsequently differed from reasonable forecasts.

This provision would preserve Commission review without making the Commission the day-to-day dispatcher of individual generating units.

8. Ensure Series 41 accommodates new dispatchable generation, including natural gas-fired generation.

Affected Section: § 150-41-1.6; New § 150-41-1.6.1

GO-WV recommends adding immediately following the revised Intent provision:

§ 150-41-1.6.1. Fuel-Neutral Application and Future Generation. — *This rule shall be administered in a fuel-neutral manner consistent with W. Va. Code § 24-2-1d and shall not be interpreted or applied in a manner that establishes a regulatory preference among coal-fired and natural gas-fired generating resources based solely upon fuel type.*

In administering this rule, the Commission shall recognize the importance of both maintaining economically competitive existing dispatchable generation and providing a regulatory environment that accommodates investment in new dispatchable generation capable of providing reliable and affordable electricity to West Virginia consumers.

Nothing in this rule shall be construed to discourage the development, construction or operation of new natural gas-fired generation or other dispatchable generating resources otherwise consistent with West Virginia law and Commission requirements.

The Commission's implementation of this rule should remain sufficiently flexible to account for changes in generating technology, fuel markets, electricity demand, PJM requirements and the composition of West Virginia's generation fleet.

Taken together, these eight revisions would preserve the core objectives of Series 41 while establishing several important guardrails.

The rule would continue to require utilities to maintain dispatchable generation capable of operating at high levels when needed but would not convert the 69-percent capacity factor into an unconditional dispatch mandate. It would preserve self-scheduling as an available tool without creating a presumption in its favor. Consumer economic dispatch would be measured using the total cost of serving West Virginia customers rather than the economics of an individual plant viewed in isolation.

Most importantly for GO-WV, the revised rule would implement the Legislature's actual fuel policy by recognizing both West Virginia coal and West Virginia natural gas, while treating each according to its distinct operational and commercial characteristics.

That framework would protect ratepayers, preserve reliability and competitive market signals, and position West Virginia to maintain its existing generation assets while attracting the additional dispatchable generation the State will need in the future. A fuel-neutral approach grounded in economics, reliability and ratepayer protection will best position the State to take advantage of that opportunity.

Respectfully submitted,

GAS AND OIL ASSOCIATION OF WEST VIRGINIA

Dated: August 19, 2026

Dear WV Public Service Commission Info,

Regarding case #26-0633:

When the WV Legislature adopted HB 2014 (the data center bill) they asked the West Virginia Public Service Commission to propose rules to maintain their power plants, but also said that utilities did not have to run if it would increase customer charges for electricity. The PSC has now proposed rules that are likely to increase electric bills for West Virginians if they are followed, and "expects" utilities to "self-schedule" their plants to run, even when cheaper electricity is available from the grid.

I am writing to ask you to request that you modify the proposed rules to make it clear that utilities should utilize the cheapest cost power. Utilities should not self schedule and use higher-cost power from their power plants, even if it means the utility-owned plants are not used as often. We cannot afford to subsidize power plants that can't compete.

The proposed rules would increase electric bills, if our utilities follow them.

Please revise the proposed rules to reflect:

- Utility-owned power plants should run only if they are less expensive to run than other options.
- If the electric grid can provide cheaper energy to West Virginia utilities, the utilities should use energy from the grid.
- Utilizing the grid (PJM) balances our monopoly utilities with free market principles that protect ratepayers.
- The rules should not assume our utilities' power plants will be the most cost-effective option; the market should decide based on what resources can produce power at the lowest cost.

I urge the West Virginia Public Service Commission to modify this proposal to protect ratepayers.

Sincerely,

Mr Casey Robinson

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BOUNDLESS ENERGY™

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August 20, 2026

Via Electronic Filing

Karen Buckley
Executive Secretary
Public Service Commission of West Virginia
201 Brooks St.
Charleston, WV 25301

Re: Case No. 26-0633-E-GI

Reply Comments of Appalachian Power Company and Wheeling Power Company

Dear Ms. Buckley:

Appalachian Power Company and Wheeling Power Company (together, the "Companies") respectfully submit their Reply Comments in the above referenced proceeding.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith D. Fisher".

Keith D. Fisher (WV State Bar #11346)
Counsel for Appalachian Power Company
and Wheeling Power Company

Enclosure

cc: Victoria Wilson
Service List

PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON

CASE NO. 26-0633-E-GI

General Investigation into Adopting and
Implementing Rules Governing Electric
Generating Capacity

REPLY COMMENTS OF
APPALACHIAN POWER COMPANY AND
WHEELING POWER COMPANY

Appalachian Power Company (“**APCo**”) and Wheeling Power Company (“**WPCo**”) (jointly, the “**Companies**”), pursuant to the Commission’s July 20, 2026, order initiating this proceeding (“**Order**”),¹ hereby submit their reply comments.

1. The West Virginia Coal Association (“**WVCA**”) submitted initial comments in this matter on August 10, 2026 (“**WVCA Comments**”).

2. The WVCA Comments are flawed in two respects. First, they elevate the 69% capacity factor reference in HB 2014 as something to be *unconditionally* “achieved.”² Instead, the actual text of *W. Va. Code* § 24-2-1d(f) provides:

“The Commission shall require the utilities to maintain their thermal baseload generating units in a manner *to allow them to be able to* self-generate and achieve at least a sixty-nine percent capacity factor. *Nothing herein shall require a utility to*

¹ Attached to the Order are proposed rules issued pursuant to *W. Va. Code* § 24-2-1d (sometimes referred to herein as “**HB 2014**”), which proposed rules are designated as *W. Va. Code R. § 150-41-1 et seq.* (“**Proposed Rules**” or “**PR**”).

² WVCA Comments at 2.

operating a generating unit at a sixty-nine percent capacity if doing so will cause an increase in the charge or charges for electric energy” (emphasis added)

The Legislature expressly sought to avoid any “increase in the charge or charges for electric energy” to the Companies’ customers from operating “at a sixty-nine percent capacity.”

3. Second, unlike other parties filing initial comments in this matter, the WVCA ignores the role and jurisdiction of PJM and its federal regulator, FERC, over the wholesale electric market in which the Companies and their coal plants participate and are dispatched.

4. Consequently, the WVCA Comments also ignore the importance of affordability. Affordability requires ensuring the economic dispatch (or “consumer economic dispatch”) of coal units.

5. The National Mining Association (“**NMA**”) appears to understand what the WVCA does not. The NMA has a very long history of participating in FERC proceedings involving PJM and other RTOs addressing issues relevant to those raised by the Proposed Rules.

6. The stated position and understanding of the NMA, in which the WVCA is a member,³ on the broad topics of affordability and the role of economic dispatch and federal regulation of the wholesale electric market, are far more encouraging for the Companies’ customers:

³ https://nma.org/about-nma/member-list/?_members_alpha=W

- “NMA supports fuel diversity and the ability of all fuels to compete on a level playing field for electric generation.”
- “Thus, the importance of a reliable supply of low-cost electricity cannot be overstated. Electricity is now a basic need of life, as central to the health and welfare of Americans as food and shelter.”
- “In sum, NMA wishes to emphasize that it is not asking the Commission to grant coal an undue preference as the Commission designs and implements its restructured electricity regulatory policy.”⁴

7. As the Companies stated in their initial comments, they are focused on the affordability of electric service in West Virginia and would expect the Commission under its prescribed balancing of various interests to be similarly focused. See *W. Va. Code* § 24-1-1(b).

8. The goal of HB 2014 is to maximize use of the Companies’ coal and gas units on a basis that is *affordable* to the Companies’ customers. That means adhering to sound economic principles and PJM market guidelines that ensure those units are only dispatched when doing so does not increase costs to the Companies’ West Virginia customers; that is, to avoid requiring the recovery of losses from uneconomic dispatch from West Virginia customers.

9. As noted throughout their initial comments, the Companies strongly recommend that, prior to the finalization of any proposed rules under HB 2014, workshops be convened to address and openly discuss these important principles, guidelines, and affordability issues.

⁴ NMA Comments at 4, 8-9, filed on June 17, 2002, in *Standardization of Generator Interconnection Agreements & Procedures*, FERC Docket No. RM02-1 (Order No. 2003).

WHEREFORE, the Companies respectfully request that the Commission not finalize or approve the Proposed Rules as written at this juncture and, instead, implement the Companies' recommendations in their initial comments.

Respectfully submitted,

**APPALACHIAN POWER COMPANY
WHEELING POWER COMPANY**
By Counsel

/s/Keith D. Fisher

Keith D. Fisher, Esq. (WVSB 11346)
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STEPTOE & JOHNSON PLLC
Chase Tower, 17th Floor
P. O. Box 1588
Charleston, WV 25326-1588
(304) 353-8124

Dated: August 20, 2026

CERTIFICATE OF SERVICE

I, Keith D. Fisher, counsel for Appalachian Power Company and Wheeling Power Company, do hereby certify that a copy of the foregoing pleading was served upon counsel of record in the above-referenced proceeding by electronic mail on this 20th day of August 2026.

/s/Keith D. Fisher
Keith D. Fisher (WVSB 11346)

12:18 PM AUG 20 2026 EXEC SEC DIV

COAL FAX



August 20, 2026

Ms. Karen Buckley

Executive Secretary

West Virginia Public Service Commission

P.O. Box 812

Charleston, WV 25323

FAX NUMBER 304-340-0325

Re: Reply Comments: Proposed Rule 150 CSR 41

Case No. 26-0633-E-GI

**General Investigation into Adopting and Implementing Rules Governing
Electric Capacity Regulations**

Dear Ms. Buckley:

**Attached, please find the reply comments of the West Virginia Coal Association on the
above-referenced proposed rulemaking.**

Respectfully Submitted,

Jason Bostic

West Virginia Coal Association

12:18 PM AUG 20 2026 EXEC SEC DIV

1



West Virginia Coal Association

200 Association Drive, Suite 160, Charleston, WV 25311 • (304) 342-4153 • Fax 342-7651 • www.wvcoal.com

August 20, 2026

Ms. Karen Buckley
Executive Secretary
West Virginia Public Service Commission
P.O. Box 812
Charleston, WV 25323

Re: Proposed Rule 150 CSR 41
Case No. 26-0633-E-GI
General Investigation into Adopting and Implementing Rules Governing Electric Capacity Regulations

REPLY COMMENTS

Dear Ms. Buckley:

Pursuant to the Public Service Commission's (PSC) Order of July 20, 2026, the West Virginia Coal Association (WVCA)¹ submits these reply comments on the Commission's proposed "Rules Governing Electric Generating Capacity Utilization," 150 CSR 41.

The proposed rule should be finalized because it gives the PSC the timely information it needs to determine whether ratepayer-financed coal generation assets are being operated correctly, before imprudent practices impose years of avoidable costs on West Virginia customers.

WVCA was intimately involved in the Legislature's consideration and passage of House Bill (HB) 2014, and WVCA has been an active party throughout the PSC proceedings that exposed exactly the problem 150 CSR 41 is designed to fix: a coal fleet capable of running at 69 percent capacity or

¹ WVCA is a trade association representing the interests of companies engaged in the mining of coal within the State of West Virginia. WVCA's producing membership accounts for more than 95 percent of West Virginia's underground and surface coal production of both thermal and metallurgical coal. WVCA also represents approximately 150 associate members that supply an array of services to the mining industry. WVCA's primary goal is to enhance the viability of West Virginia coal as a source of secure and efficient domestic energy by facilitating safe and environmentally responsible coal mining through reasonable, equitable, and achievable state and federal policy and regulation.

higher and producing cheaper, more reliable power than PJM market purchases, held back so the utilities can collect on it twice — once as rate-based capacity sitting available, and again on every dollar of pricier replacement power purchased from PJM in its place. **The proposed rule enforces a simple, overdue principle — West Virginia's power plants exist to run for the ratepayers who paid for them, *not to sit on the rate base while their owners shop the market and bill twice for the privilege.***

As reflected in HB 2014 and WVCA's initial comments, the proposed rule would require utilities to provide the Commission with timely and transparent information necessary to determine whether West Virginia's coal-fired power plants are being operated responsibly and for the benefit of ratepayers. **The United Mine Workers of America noted in its initial comments, "regulated utilities provide information only when it serves their interest or when required to do so in a public forum."** **The PSC's proposed rule would create that requirement.** The Legislature and the Commission are responding to factual, well-documented, and adjudicated situations in which ratepayer-financed coal plants were not operated, or could not be operated, in a manner that avoided costly impacts for West Virginia residents.

With that in mind, the antagonistic and exaggerated tone of some of the initial comments should be enlightening to the PSC and the Legislature as it considers this rulemaking. Many of the initial submissions take a "sky is falling" panicked tone, with pages of comments and attachments only speculating about the possible interpretation and implementation of the PSC's proposal. ***Several of the initial comments also continue what has become a persistent, almost habitual (and obviously concerning to the PSC, Legislature and other policy makers) practice of pointing to wholesale power markets, participation in PJM and federal regulations as both an excuse for previous imprudent behavior and a defense for West Virginia and the PSC not seeking the information from plant owners to protect ratepayers and the public interest generally.***

These same comments completely ignore the validated and verified situations where the sky did indeed fall, plants were not operated and were not even capable of being operated, costing ratepayers millions. As the PSC knows well, these impacts extended through the fuel supply chain, impacting coal production and employment, wages, taxes, and local communities. Oddly, these same comments are completely silent on their previous behavior that served as the legislative catalyst for this proposal.

WVCA is not prejudging the future behavior of our regulated utilities and is certainly open to continued dialogue regarding these issues. However, the past actions that motivated the Legislature and the PSC to undertake this rulemaking cannot be ignored.

Although WVCA referenced several previous PSC proceedings in its initial comments, those official findings and orders warrant further discussion because several opponents of the proposed rule do not meaningfully address the conduct and findings that led to this rulemaking. The more complete references below will also help readers unfamiliar with the prior proceedings understand why the proposed rule is necessary.

Beginning in 2021, the Commission expressed concern that utilities were relying on PJM-purchased power even when increased use of in-state generation appeared more economical:

...[the] projected ENEC costs include significant amounts of purchased power which could be prudent if it is clear that purchased power costs will be less expensive when compared to generation at the West Virginia power plants.

We are faced with projected ENEC costs that include utilization of West Virginia power plants at capacity factors of 49.6 percent, 57.3 percent and 34.7 percent... At the same time, projected variable costs for those plants, as described above, are considerably lower than projected [PJM] purchased power costs [emphasis added].²

² West Virginia Public Service Commission Order dated September 2, 2021, Case No. 21-0339-E-ENEC

The PSC's determination, based on a thorough analysis and complete proceeding was simple and succinct: ***"We conclude that the public interest is better served by reversing that trend, and focusing on maximizing generation from its owned power plants."***³

Rather than proceeding in good faith and striving to operate their plants according to the decision and to serve the "public interest," the utility sought reconsideration of the decision. The PSC again restated its conclusions regarding the benefits of self-generation from West Virginia coal plants — and the utility, in the meantime, not only continued but increased its purchases of more expensive PJM power:

The companies apparently presume that the costs to run their own plants will be more expensive than purchasing power from PJM. The Commission does not agree with this premise, which is the reason the Commission made the decisions in the [September 2021] Final Order.

We do not know now whether the Companies are influenced by a decarbonization policy or not. However, the Commission's intent, when setting a utilization target for the Companies' fossil-fuel fired plants, is to require the Companies to follow a power supply policy to maximize their use of fossil-fuel generation that is cheaper than purchased power rather than a policy geared to decarbonization at any cost [emphasis added].⁴

In the same proceeding, the agency noted the concerning utility behavior of idling its own generation assets in favor of purchasing power from PJM continued, a trend that increased despite the original instruction from the PSC in September 2021:

We are also concerned that the growth in purchases of high-cost discretionary purchased power has accompanied declining utilization of the Companies' West Virginia generating plants. In spite of our goal of a minimum sixty-nine percent capacity factor from West Virginia power plants, which appear to be able to produce power at costs that are well below the cost of purchased power, the capacity factors have not approached that level in September, October, and November of 2021.⁵

³ West Virginia Public Service Commission Order dated September 2, 2021, Case No. 21-0339-E-ENEC

⁴ West Virginia Public Service Commission Order dated March 2, 2022, Case No. 21-0339-E-ENEC

⁵ West Virginia Public Service Commission Order dated March 2, 2022, Case No. 21-0339-E-ENEC

We previously had projected that reduced output from the coal plants and increased reliance on purchased power were detrimental to the interests of customers. **However, the detriments to customers are multiplied by the actual “perfect storm” of reduced utilization of our coal plants while PJM market prices were jumping to levels of nearly \$60 per MWH or more than double the cost of self-generation.**

Power purchased from the PJM market has increased above projections originally made by the Companies and even more above the targets set by the Commission [emphasis added].⁶

Although originally identified by the PSC and addressed through two separate orders, the utility did not modify its operating approach, that is buying more expensive power while its ratepayer financed and cheaper to operate coal plants idle:

It is clear that reliance on the PJM energy markets is producing unreasonable cost levels and ENEC under-recoveries that the Companies now ask West Virginia customers to pay. The Commission recognized the excessive cost of relying on the PJM energy market in September 2021 when we ordered the Companies to increase self-generation in lieu of the PJM market and high cost purchased power contracts. ***If the Companies had been able to increase self-generation and foregone reliance on PJM energy, then the recent spate of under-recoveries would have been greatly reduced or eliminated.***⁷

We were not told by the Companies at the initial stage of this proceeding that they were scraping the bottom of their coal inventory which would make it difficult for them to use their power plants at maximum levels no matter how much could be saved by self-generation. **It is clear that the Companies’ fuel supply planning and overreliance on market purchases are self-inflicted wounds** [emphasis added].⁸

Unfortunately for West Virginia’s ratepayers, when purchased power costs became too expensive for the utility to ignore or to habitually conceal from the public and the PSC with convoluted references to PJM market rules, it was too late. Coal inventories were remarkably low and any available fuel supply to replenish them was committed elsewhere:

⁶ West Virginia Public Service Commission Order dated March 2, 2022, Case No. 21-0339-E-ENEC

⁷ West Virginia Public Service Commission Order dated May 13, 2022, Case No. 21-0339-E-ENEC.

⁸ West Virginia Public Service Commission Order dated May 13, 2022, Case No. 21-0339-E-ENEC.

It is not clear to us how the companies were not more concerned in late 2020 and 2021 that rising gas prices and other market modifications that have been driven by PJM policy changes in recent years would make the benefits of low PJM market prices a distant memory. Instead of allowing coal inventories to decline precipitously, the Companies should have been doing everything possible to use their plants more and increase fuel inventories at the same time.⁹

Critical to understanding the background, motivation and “public interest” need for the current rulemaking are the PSC conclusions in the same proceeding:

Strategy for bidding into the PJM energy market is a critical element of prudent use of self-generation capabilities. **Self-generation may not be the most economical option during parts of a day, but could become very valuable during other parts of the same day.** Base load coal plants are not easily cycled from no load to maximum load, whereas PJM market prices can vary hourly. **Selling into a soft PJM market price for a number of hours in order to have plants up and running to take advantage of peak pricing hours is how we expect the Companies to operate.** When it became apparent that rising gas prices were going to lead to more and more hours when PJM market prices would exceed the cost of self-generation, the Companies should have been more aggressive both in building fuel supply inventory and bidding to maximize their generation plant utilization. **We are not satisfied with the Companies saving a few pennies during some low-price hours or during an unreasonably low-priced market period in early 2020, but spending many dollars as gas prices drove PJM market prices to very high levels by mid 2021 and into the present and likely into the future [emphasis added].**¹⁰

Appropriately, given the fully documented efforts of the utility to ignore the PSC’s previous instructions, the agency directed a prudency review of the utility’s operational behavior:

⁹ West Virginia Public Service Commission Order dated May 13, 2022, Case No. 21-0339-E-ENEC.

¹⁰ West Virginia Public Service Commission Order dated May 13, 2022, Case No. 21-0339-E-ENEC.

We direct our Staff to do an in-depth prudence review of the Companies' policies and procedures for maximizing and maintaining adequate fuel inventory levels, bidding their plants into the PJM market to maximize economical self-generation, **recognizing that it may be necessary to sell at a small loss in some hours to capture the net benefits of higher market prices within any twenty-four-hour period. We also require evidence of proper and prudent plant maintenance and availability so that the benefits of self-generation can be realized when the opportunities arise. *Until we get a full report and gather further information on the Companies' practices, we cannot find that the under recoveries that have accumulated should be passed on fully to customers.***¹¹

The results of the *independent* prudency review, provided to the PSC in April 2023, are further illustrative of why the proposed rule is needed and long overdue:

The net effect of no significant changes in the processes of procuring the fuel and bidding into PJM has been that the plants were not able to be dispatched by PJM resulting in inconsistent lower capacity factors for the coal units and increased costs to the rate payers.

The processes of fuel procurement and bidding into PJM did not appear to account for the requirements of the Commission to operate the plants at higher capacity factors. It seems that the Companies rely on PJM as the "ultimate supplier of generation" for their systems and do not appear to favor the self-generation options of their coal power plants. **Based on CTC's review of the capacity factors of the coal plants over the past ten years, the Companies have placed an overreliance on the PJM Market and nearly got out of the habit of utilizing their own plants for their generation.**

...no specific programs, steps nor actions were taken for the longer-term procurement of the coal and chemicals to allow operation at higher capacity factors, closer to the 69% the Commission ordered.

The common sense conclusions which can be arrived at is the West Virginia ratepayer were paying rates for coal units to last until 2040, while no longer-term or creative approaches to obtain the fuel needed for the higher capacity factors as required by the Commission were being pursued. *Basically, the ratepayers are paying rates for plants which are not being dispatched to their full abilities due to the poor sense or judgement of the companies* [emphasis added].¹²

¹¹ West Virginia Public Service Commission Order dated May 13, 2022, Case No. 21-0339-E-ENEC.

¹² "Independent Technical Prudency Review of the Actions Affecting the Operations of the Amos, Mountaineer and Mitchell Coal Plants." Case No. 22-0393-E-ENEC, 21-0339-E-ENEC.

CTC did not see during its review of the documentation that any bidding processes were changed, enhanced, or modified to assist these plants during the time period to achieve higher dispatchability factors. **No specific attempts to lower the variable costs of generation were seen by CTC. In fact, adders were placed on the bidding prices to assure that the plants available were not dispatched to avoid having them end up with no coal piles available to operate.**

We conclude that there seems to be a reluctance to rely on the self-generation option using the coal power plants which are recovered through rates.

This approach, while it may meet ESG goals, does not support the requirements of dispatchability and associated capacity factors which the Commission established

[emphasis added].¹³

As WVCA noted in its initial comments, the Commission's findings and the conclusions of the independent prudency review were further confirmed by the West Virginia Public Energy Authority (PEA). Citing the independent prudency report conducted by PSC staff, the PEA noted:

The Companies rely on PJM as the "ultimate supplier of generation" for their systems and do not appear to favor the self-generation options of their coal power plants.

As regulated utilities, the Companies focus on meeting projected customer needs at the lowest cost via the economic dispatch of their plants. ***As a result of its independent evaluation, CTC did not find that these important goals were met, resulting in a significant violation of the Companies' responsibilities toward its customers*** [emphasis added].¹⁴

The timing of the prior proceedings is essential to evaluating the critical need for the current proposed rule. The Commission first raised concerns about the operating capacity factors of in-state coal plants in September 2021. Related proceedings, including the independent prudency review, continued through 2023. After receiving the independent report and denying rate recovery, the Commission's decision was challenged before the West Virginia Supreme Court, which upheld the agency's prudency conclusions in November 2024.

¹³ "Independent Technical Prudency Review of the Actions Affecting the Operations of the Amos, Mountaineer and Mitchell Coal Plants." Case No. 22-0393-E-ENEC, 21-0339-E-ENEC.

¹⁴ https://commerce.wv.gov/wp-content/uploads/2024/07/WVPEA_7_31_24.pdf

As of August 2026, proceedings before the PSC continue on the remanded portions of the case. For six years, West Virginia rate payers have digested either increased utility bills or at least the threat of increased rates as the PSC's conclusions in "normal" rate proceedings were at first disputed, then independently confirmed and then again disputed with litigation and once again confirmed by the state's highest court. The rule proposed by the PSC and clearly contemplated by the Legislature with the passage of HB 2014, would arm the agency with timely data to judge the prudent operation of rate payer financed coal plants, before years of rate increases accumulate.

WVCA also feels compelled to address the significant references in some of the initial comments to participation in the PJM interconnection. As regulated utilities within the State of West Virginia, with significant guaranteed rate recovery, the obligation of these utilities is first to their ratepayers. WVCA is concerned, as was the Legislature, that participation in PJM has become the convenient and chronic excuse for any situation concerning the operation of in-state coal plants. Here again, the PSC's own findings are worth noting:

Reasonable exercise of the PJM self dispatch flexibility is a required element of prudence. The Companies have that flexibility, yet we continue to hear from witnesses that they do not or are directed to operate plants as if they do not. **The Companies are not slaves to PJM dispatch, and we expect them to operate accordingly.**¹⁵

The proposed rule allows the Commission to determine before the fact—not years and hundreds of millions of dollars in under-recoveries later—whether in-state plants are being “operated accordingly.” **Opponents’ repeated reliance on PJM rules should not obscure the utilities’ independent obligation to operate prudently for West Virginia ratepayers. West Virginia’s regulated utility system guarantees rates and secures returns for the corporate parent with little complaint from the companies. It should work at least as well for the ratepayers who fund it, and the Legislature and the Commission have every right to insist on prudent operation of the assets those ratepayers finance, PJM participation notwithstanding.**

¹⁵ West Virginia Public Service Commission Order dated August 28, 2025, Case No. 24-0854-E-42T.

With HB 2014, the Legislature and the Governor said plainly that the state's coal-fired power plants are to be upgraded and operated at the highest achievable capacity factors. Finalizing this rule — with its required-upgrade provisions intact — is how the PSC turns that legislative intent into practice.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Chris R. Hamilton", written in a cursive style.

Chris R. Hamilton
President & CEO
West Virginia Coal Association

02:30 PM AUG 20 2026 EXEC SEC DIV

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VIA ELECTRONIC FILING

August 20, 2026

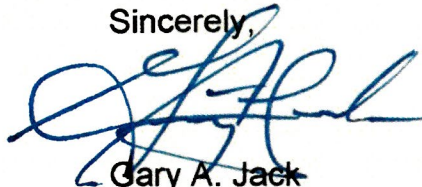
Ms. Karen Buckley
Public Service Commission of West Virginia
201 Brooks St.
Charleston, WV 25301

CASE NO. 26-0633-E-GI
General investigation into Adopting and
Implementing Rules Governing Electric
Generating Capacity Regulations

Dear Ms. Buckley:

Attached for filing are Reply Comments of Monongahela Power Company and the Potomac Edison Company in the above-reference case.

Sincerely,



Gary A. Jack
Senior Corporate Counsel
WV State Bar No. 1855

**BEFORE THE PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON**

CASE NO. 26-0633-E-GI

General investigation into Adopting and
Implementing Rules Governing Electric
Generating Capacity Regulations

**REPLY COMMENTS OF MONONGAHELA POWER COMPANY AND
THE POTOMAC EDISON COMPANY**

Monongahela Power Company ("Mon Power") and The Potomac Edison Company ("PE") (collectively, the "Companies") hereby provide reply comments regarding the Commission Order dated July 20, 2026, and the proposed rules in this proceeding, and specifically to the comments filed by the West Virginia Coal Association ("Coal Association") and the United Mine Workers of America ("Mine Workers").

I COAL ASSOCIATION

The Coal Association states that the proposed rule requires the data and information necessary for the agency to ensure the state's coal-fired power plants are operated responsibly and to the benefit of the state's ratepayers. (Page 2). However, the Coal Association either neglects to inform or is unaware of all the information already provided to the Commission regarding power station performance, upgrades, and budgets. Those proceedings and reports include:

1. The annual ENEC cases where power station performance, upgrades, capital projects, and O & M projects and budgets are exchanged, evaluated, and reviewed annually;
2. Monthly reporting provided to the Commission on coal burn, inventory, receipts, purchased power costs, PJM energy bids, LMPs, and other information provided in monthly SESD cases;
3. Bi-annual filings provided on power station outages, performance, heat rate, availability, coal quality, and other matters in Case No. 07-1496-E-GI;
4. Other specific cases filed with the Commission such as ELG, MATS, IRP, and other proceedings where power station operations and fuel information are filed, exchanged in discovery, and evaluated;
5. HB 966 monthly reports on coal deliveries, quality, sources, and other coal information; and
6. Other reports such as reports on Harrison Condition 3 which lists revenue calculations at Harrison and energy and capacity output and purchases for the Companies.

The Coal Association cites a 2021 ENEC order as support for the proposed rules, but that case had nothing to do with Mon Power and PE. The Coal Association should not advocate for rules across an entire industry based on a case applying to one utility. Additionally, the Coal Association is well aware there

are no guaranteed recovery and profit margins, yet it states to the contrary. (Page 3). A utility has an opportunity to earn a profit, but under the current historic test year framework for base rate recovery, that authorized return can never be earned due to time lag and investments being made by the utility.

The Coal Association makes a number of unsupported claims that the generating assets are being controlled by “convenient political aspirations established in far-away corporate boardrooms.” (page 4 and page 3). Again, the cites are not applicable to Mon Power and PE, and the Companies should not be caught up in the Coal Association’s assertions to others.

Finally, regarding expanding the rule to include oversight and reporting on plant upgrades, that again is provided in ENEC and other proceedings before the PSC as shown above. Mon Power and PE have personally invited the Coal Association to visit our plants and learn about the upgrades occurring and planned. To date, the Coal Association has not taken the Companies up on their offer. It appears to the Companies that the Coal Association would rather complain to the PSC than actually learn what actual upgrades and investments are occurring at the plants.

II UMWA

The UMWA’s comments are very similar to the Coal Associations. First, UMWA complains about a public hearing held in the Companies’ new generation case on July 15, 2026 and states:

"As the UMWA recently witnessed during a public hearing before the Commission, regulated utilities provide information only when it serves their interest or when required to do so in a public forum. During that hearing, the information provided by the utilities was incomplete and omitted significant details that would have demonstrated that the project would increase costs well beyond the request rate hikes previously provided. The utilities often cite confidentiality or proprietary business restrictions that prevent the release of this critical information."

As the Commission well knows, the public hearing was for the public and not the utilities or intervenors. The utilities, as a party, are not permitted to provide information or testimony at the public hearing. The hearing is for the public, and not for the parties. The UMWA allegations are incorrect and misplaced as it does not understand the purpose of a public hearing. At the evidentiary hearing, the UMWA left early (the morning of the hearing after its witness went first), and it did not participate in that hearing.

The UMWA states it is unaware of any upgrades (page 2), but the UMWA has not sought to learn about any of the upgrades or investments being made at the power stations. The Companies have invested approximately \$500 million in capital upgrades and component replacement projects over the past 5 years at the Fort Martin and Harrison Power Stations. Some of the upgrades included new bottom ash removal systems, steam turbine overhauls/upgrades, generator rotor and stator refurbishments, large boiler tube surface replacement projects, environmental system upgrades, and control system for the plant upgrades.

Further, the UMWA states HB 2014 was also expected to require coal-fired plants to operate at the highest achievable capacity factor, which utilities had failed

to do under existing rules. (page 2). HB 2014 does not require such a standard, and to require such a standard would be detrimental to ratepayers who would be paying for power at higher costs than if lower cost power were purchased from PJM. The language from the statute is:

“The commission shall require the utilities to maintain their thermal baseload generating units in a manner to allow them to be able to self-generate and achieve at least a sixty-nine percent capacity factor. Nothing herein shall require a utility to operate a generating unit at a sixty-nine percent capacity if doing so will cause an increase in the charge or charges for electric energy over and above the established and published tariff, rate, joint rate, charge, toll or schedule.” WV Code 24-2-1d(f).

The UMWA urges the following in its comments: (1) require real-time operational data (already provided to the PSC); (2) detailed reporting on outages, curtailments, and capacity reductions (already provided in reporting); (3) enforce strict timelines for plant upgrades (the capital and O & M budgets are reviewed by the PSC in ENEC, base rate, and other proceedings such as ELG, MATS, and other upgrade proceedings); (4) ensure utilities cannot reduce plant output for reasons unrelated to reliability or safety (the main reasons plant output is reduced is due to market pricing, forced and planned outages, and environmental requirements, which are all legitimate reasons for reduced output); and (5) provide the Commission and other agencies with full authority to monitor and intervene (not within the utilities control). One of the main problems with the proposed rules is that it requires much more detailed and frequent reporting of a huge amount of information, which will increase costs to ratepayers and be of very

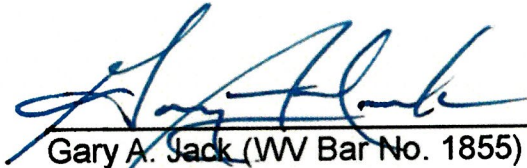
questionable benefit based on the information already provided to the Commission and parties.

III Conclusion

The Companies have always supported the West Virginia coal industry, the coal miners, and the generation of coal-fired electricity. But the Companies are concerned that the industry speakers have launched themselves into an unrealistic paradigm where all that matters is burn more and more coal no matter the impact to customers and the state, including environmental requirements that must be adhered to. Both the Coal Association and UMWA act as if the Commission has little information or data about the operations of the power plants. Nothing could be further from the truth. The information is provided in detail, and evidentiary hearings and interested party participation occur in these proceedings. There is more than ample opportunity for the Coal Association and UMWA to learn more about the operations and upgrades if they choose to be involved rather than advocate for more regulation. If they really want to mine and burn more coal, they could work toward lowering the price of their fuel so that it is more competitive in the PJM wholesale market and so that more of that fuel is utilized rather than cheaper alternatives.

Respectfully submitted this 20th day of August 2026.

MONONGAHELA POWER COMPANY and
THE POTOMAC EDISON COMPANY



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