

February 2012  
PE 12-20-531

## SPECIAL REPORT

# COAL RESOURCE TRANSPORTATION SYSTEM

### OVERVIEW

Since 2003, the Coal Resource Transportation System Has Collected Over \$23 Million Which Has Assisted in Funding 52 Road and Bridge Projects



WEST VIRGINIA LEGISLATIVE AUDITOR  
PERFORMANCE EVALUATION & RESEARCH DIVISION



WEST VIRGINIA LEGISLATIVE AUDITOR

## PERFORMANCE EVALUATION & RESEARCH DIVISION

Building 1, Room W-314  
State Capitol Complex  
Charleston, West Virginia 25305  
(304) 347-4890

Aaron Allred  
Legislative Auditor

John Sylvia  
Director

Denny Rhodes  
Research Manager

Daniel Caldwell  
Research Analyst

---

## CONTENTS

Executive Summary ..... 5

Issue 1: Since 2003, the Coal Resource Transportation System Has Collected Over \$23 Million Which  
Has Assisted in Funding 52 Road and Bridge Projects ..... 7

### List of Tables

Table 1: Coal Resource Transportation System (CRTS) Permit Revenue by Class ..... 10  
Table 2: CRTF Annual Expenditures and Revenues ..... 13  
Table 3: Total CRTS Projects 2004-2011 ..... 15  
Table 4: Total CRTS Projects by County Fiscal Years 2004-2011 ..... 16  
Table 5: WV Code Excess Weight Fine Schedule Found in §17C-17A-10(a) ..... 19

### List of Figures

Figure 1: Total CRTS Monies Collected Fiscal Years 2003-2011 ..... 9  
Figure 2: Coal Resource Transportation System Permit Revenue Fiscal Years 2003-2011 ..... 10  
Figure 3: Total Notices of Violation Issued Fiscal Years 2004-2011 ..... 11  
Figure 4: Notice of Violation Fees Collected Fiscal Years 2003-2011 ..... 12  
Figure 5: CRTS Repair and Maintenance Request Process Within CRTS Counties ..... 13  
Figure 6: CRTS Funding Sources ..... 14  
Figure 7: CRTS Miles Per County ..... 16

### List of Appendices

Appendix A: Objective, Scope and Methodology ..... 21  
Appendix B: Map of the CRTS Counties ..... 23  
Appendix C: Coal Resource Transportation System Projects ..... 25



## EXECUTIVE SUMMARY

The Legislative Auditor conducted an evaluation of the Coal Resource Transportation System (CRTS) that was created in West Virginia Code §17C-17A-1. The CRTS is a specially designated network of widely-used roads and bridges throughout 18 West Virginia counties that permit a greater gross weight for commercial motor vehicles, require special permits to utilize, and are maintained and repaired with a supplemental CRTS fund. The Public Service Commission (PSC) has administrative oversight and is involved with issuing permits, enforcing laws, and collecting all fees. The Division of Highways (DOH) is responsible for administering the Coal Resource Transportation Fund (CRTF) and the maintenance and repair of CRTS roads and bridges.

### Report Highlights:

**Finding: Since 2003, the Coal Resource Transportation System Has Raised Over \$23 Million in Revenue Which Has Assisted in Funding 52 Road and Bridge Projects.**

- › The PSC has collected over \$23 million from the CRTS.
- › The PSC has issued an average of 1,800 CRTS permits annually and collected over \$6 million from permit fees.
- › The PSC has issued approximately 3,554 Notices of Violation (NOV) and has collected over \$2.5 million in violation fees since 2004.
- › The CRTF, administered by the DOH, had total revenues of over \$26 million and total expenditures of nearly \$22 million since 2004.
- › The majority of CRTS projects have been completely funded by the CRTF.
- › The Legislative Auditor is concerned that current fines do not adequately inhibit coal companies from overloading coal trucks.

### Recommendation:

*The Legislative Auditor recommends that the Legislature consider reviewing the current excess weight fine schedule outlined in West Virginia Code §17C-17A-10(a) to determine if it is acting as an effective deterrent in overloading trucks.*



## Issue 1

### **Since 2003, the Coal Resource Transportation System Has Collected Over \$23 Million Which Has Assisted in Funding 52 Road and Bridge Projects.**

---

#### **Issue Summary**

In 2003, the Legislature created the Coal Resource Transportation System (CRTS) in West Virginia Code §17C-17A-1. The CRTS is a specially designated network of widely-used roads and bridges throughout West Virginia that permit a greater gross weight for commercial motor vehicles, require special permits to utilize, and are maintained and repaired with a supplemental CRTS fund. Oversight responsibilities of the CRTS are divided between two state agencies – the Transportation Administration Division of the Public Service Commission (PSC), and the Division of Highways (DOH). The PSC has administrative oversight and is involved with issuing permits, enforcing laws, and collecting all fees. The DOH is responsible for administering the Coal Resource Transportation Fund (CRTF) and the maintenance and repair of CRTS roads and bridges. Since 2003, the PSC has collected over \$23 million in total revenue from the CRTS. The PSC has issued approximately 1,800 CRTS permits annually and has collected a total of over \$6 million from permit fees. Approximately 3,554 Notices of Violation have been issued and the PSC has collected over \$2.5 million from these violation fees. The DOH has completed 52 road and bridge projects at a cost of nearly \$30 million with CRTS funds. The median CRTS project cost approximately \$264,256. The Legislative Auditor recommends that the Legislature consider altering the excess weight fine schedule found in West Virginia Code §17C-17A-10(a) to create a more effective deterrent to overloading coal trucks.

---

*The mission of the CRTS is to facilitate the transfer of coal throughout West Virginia by designating a network of widely-used roads and bridges as those allowing a greater gross weight for commercial motor vehicles, requiring special permits to utilize, and maintaining roads through a special fund.*

---

---

#### **Introduction**

The Coal Resource Transportation System (CRTS) was created by Senate Bill 583 in 2003 and established in WV Code §17C-17A-1. The mission of the CRTS is to facilitate the transfer of coal throughout West Virginia by designating a network of widely-used roads and bridges as those allowing a greater gross weight for commercial motor vehicles, requiring special permits to utilize, and maintaining roads through a special fund. This legislation raised the maximum weight of coal trucks on these designated roads to 120,000 pounds plus a five percent variance. Special annual permits are required to transport coal on these roads, and these permits cost anywhere from 100 to 500 dollars based on

the number of truck axles as determined by WV Code §17C-17A-5(b). The CRTS legislation also created reporting requirements for shippers and receivers of coal, in which both parties must electronically report the weight of each load of coal for verification purposes. The CRTS comprises roads and bridges in 18 West Virginia counties. The original 2003 legislation included roads and bridges in the counties of Boone, Clay, Fayette, Greenbrier, Kanawha, Lincoln, Logan, McDowell, Mercer, Mingo, Nicholas, Raleigh, Wayne, Webster and Wyoming. Additional legislation passed in 2005 added roads and bridges in Braxton and Ohio Counties to the CRTS. Only one county – Upshur County – has been added through the Coal Resource Designation Committee created in WV Code §17C-17A-12 rather than through direct legislation. A map of the CRTS counties is included in Appendix B. Since 2003, the CRTS has collected \$23,173,687, which has assisted in 52 repair and maintenance projects on CRTS roads and bridges. The median CRTS project cost approximately \$264,256. Oversight responsibilities of the CRTS are divided between two state agencies – the Transportation Administration Division of the Public Service Commission (PSC), and the Division of Highways (DOH). The PSC has administrative oversight and is involved with issuing permits, enforcing laws, and collecting all fees. The DOH is responsible for administering the Coal Resource Transportation Fund (CRTF) and the maintenance and repair of CRTS roads and bridges.

---

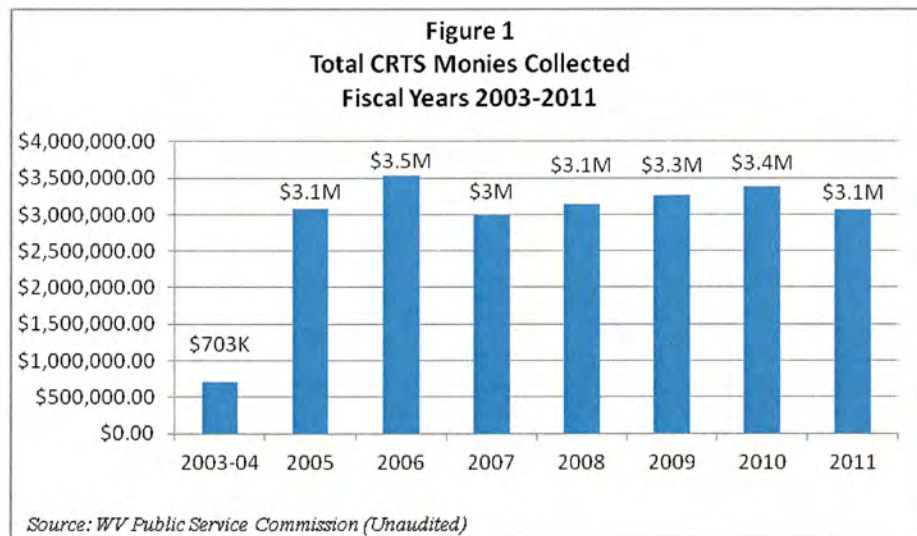
*The Transportation Administration Division of the PSC collects revenue from the CRTS through a variety of sources including permit sales, tonnage fees, and violation fees.*

---

### **The Public Service Commission Has Collected a Total of Over \$23 Million from the CRTS**

The Transportation Administration Division of the PSC collects revenue from the CRTS through a variety of sources including permit sales, tonnage fees, and violation fees. The Legislative Auditor has determined that the total revenue collected by the PSC from the different sources has remained stable through the years 2005-2011, with the lowest amount coming in 2007 (\$3 million) and the highest amount coming in 2006 (\$3.5 million). The only outlier is the 2003-04 years due to the program being newly implemented. Figure 1 details the total revenue collected from the CRTS through years 2003-2011. The average revenue per year from 2005 to 2011 was \$3.2 million.





**Since Acquiring Administrative Oversight of the CRTS, the Public Service Commission Has Issued an Average of 1,800 CRTS Permits Annually and Collected a Total of Over \$6 Million from Permit Fees**

The PSC is responsible for special permit issuance, weight enforcement, and administering citations. WV Code §17C-17A-3(b) transferred weight and safety enforcement oversight of the CRTS to the PSC from the Division of Highways. To meet this new statutory requirement, approximately 70 employees within the DOH who monitored weight and safety enforcement were transferred to the PSC in 2003. The PSC is also in charge of collecting monies from permit sales, tonnage fees, and Notice of Violation fees, all of which are transferred into the Coal Resource Transportation Fund (CRTF) that is administered by the DOH. CRTS permits are issued in four different classes according to maximum gross weight allowed. Class A allows for a maximum of 80,000 pounds, Class B allows for 90,000 pounds, Class C allows for 110,000 pounds, and Class D allows for 120,000 pounds. All classes have a five percent additional tolerance. Table 1 and Figure 2 show the total number of CRTS permits sold and the total amount of money collected from those permits for 2003-2011. Officials from the Transportation Administration Division of the PSC have stated that the reasons for the decrease in Class A and C permits in recent years is that Class B and D permits provide for a greater flexibility of weight at a relatively minor added expense of upgrading the permit to the higher class. Recent advancements in trucking equipment that allow heavier loads have also expedited the increased sales of the Class B and D permits.

---

*The PSC is responsible for special permit issuance, weight enforcement, and administering citations.*

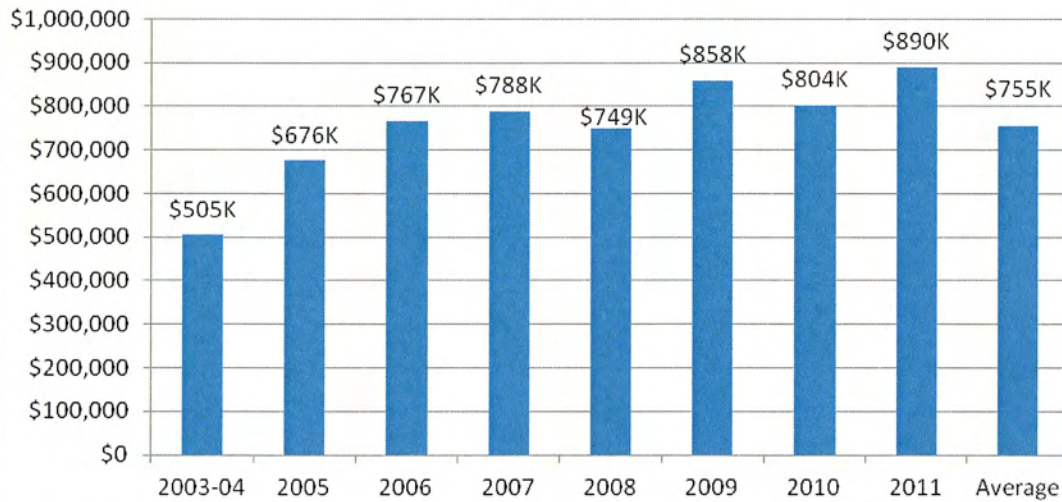
---

**Table 1**  
Coal Resource Transportation System (CRTS) Permit Revenue by Class

Fiscal Year	Class				Annual Totals
	A	B	C	D	
2003-04	61	200	183	1,011	<b>1,455</b>
2005	52	244	200	1,218	<b>1,714</b>
2006	24	278	183	1,366	<b>1,851</b>
2007	14	255	109	1,452	<b>1,830</b>
2008	14	254	77	1,472	<b>1,817</b>
2009	1	220	60	1,628	<b>1,909</b>
2010	8	228	48	1,571	<b>1,855</b>
2011	3	246	42	1,713	<b>2,004</b>
<b>Type Total</b>	<b>177</b>	<b>1,925</b>	<b>902</b>	<b>11,431</b>	<b>14,435</b>

Source: WV Public Service Commission (Unaudited)

**Figure 2**  
Coal Resource Transportation System Permit Revenue  
Fiscal Years 2003-2011



Source: WV Public Service Commission (Unaudited)

## The PSC Has Issued Approximately 3,554 Notices of Violation and Has Collected Over \$2.5 Million in Violation Fees Since 2004

The PSC also oversees the issuing and enforcement of Notices of Violation (NOV). A NOV is an official notice released by the PSC to the offending company. NOVs may, and often do, contain multiple violations within each one. The vast majority of NOVs issued are for excess weight violations. Total annual NOVs issued are listed in Figure 3, and the respective money collected annually from these NOVs is listed in Figure 4. Officials of the Transportation Administration Division have determined that the spikes in NOVs issued in 2005 and 2008, as seen in Figure 3, were directly correlated to spikes in coal prices in late 2004, early 2005, and again in 2008. These price increases triggered idled coal mining operations to resume operations which resulted in new facilities opening. Thus, the results were more loaded trucks carrying higher weights on CRTS roads, generating more violations. The increase in NOV fees collected in 2009, as seen in Figure 4, is a direct result of the higher number of NOVs being issued in 2008.

---

*The PSC also oversees the issuing and enforcement of Notices of Violation (NOV).*

---

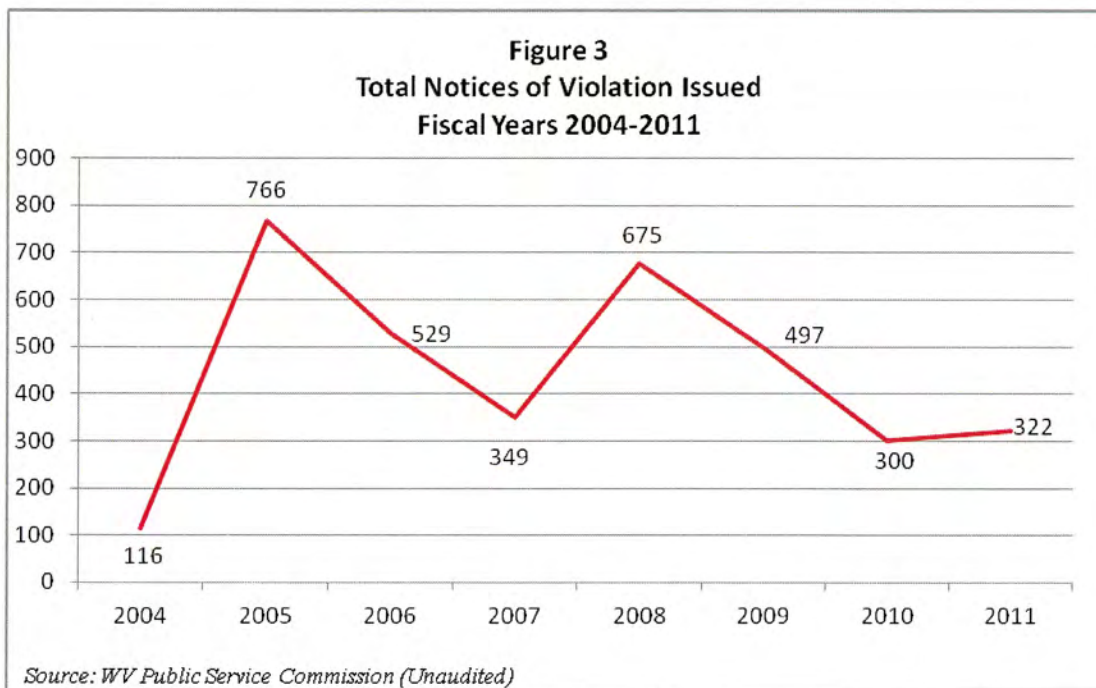


Figure 4  
Notice of Violation Fees Collected  
Fiscal Years 2003-2011



Source: WV Public Service Commission (Unaudited)

### The Division of Highways Administers the Coal Resource Transportation Fund, Which Has Had Total Revenues of Over \$26 Million and Total Expenditures of Nearly \$22 Million Since 2004

Table 2 shows the annual expenditures and revenues of the CRTF annually from 2004-2011. **The State Highway Engineer of the DOH has emphasized to the Legislative Auditor that this fund is only utilized as a supplemental source of revenue to maintain and repair CRTS roads and bridges, not as the sole source of funding.** However, out of 52 CRTS projects completed or in the process of completion, 30 have been fully funded by the CRTF. The average annual CRTF revenue is \$3.61 million per fiscal year. The CRTF cash balance as of February 2012 was \$4,158,641.

---

*The State Highway Engineer of the DOH has emphasized to the Legislative Auditor that this fund is only utilized as a supplemental source of revenue to maintain and repair CRTS roads and bridges, not as the sole source of funding.*

---

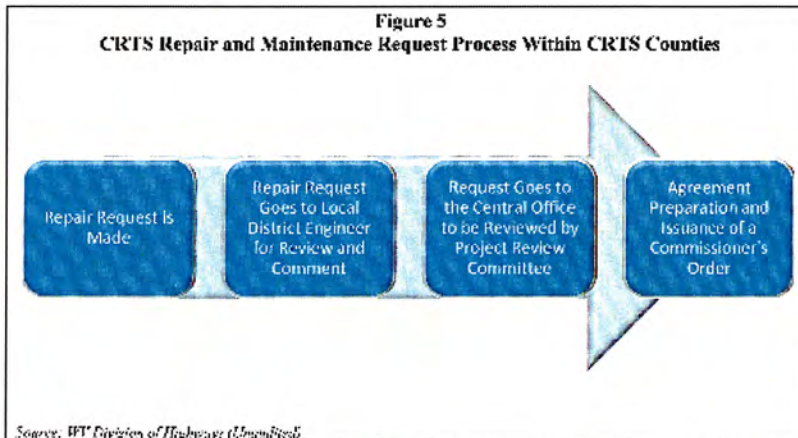
Fiscal Year	Total Expenditures	Total Revenues	Difference	Cash Balance Ending FY
<b>2011</b>	\$7,067,924	\$3,897,918	\$-3,170,006	\$4,158,641*
<b>2010</b>	\$4,089,357	\$2,784,481	\$-1,304,875	\$7,328,647
<b>2009</b>	\$2,365,756	\$3,435,188	\$1,069,431	\$8,633,523
<b>2008</b>	\$4,585,959	\$4,159,525	\$-426,435	\$7,564,091
<b>2007</b>	\$3,000,267	\$3,861,002	\$860,735	\$7,990,526
<b>2006</b>	\$439,948	\$3,332,375	\$2,892,427	\$7,129,791
<b>2005</b>	\$289,158	\$3,757,667	\$3,468,509	\$4,237,364
<b>2004</b>	\$75,731	\$827,496	\$751,765	\$768,855
<b>Total</b>	<b>\$21,914,100</b>	<b>\$26,055,652</b>	<b>\$4,141,551</b>	

Source: WV State Auditor's Office  
 Financial Information Management System  
 Current as of 10-31-11  
 \* As of February 2012

### The Majority of Coal Resource Transportation System Projects Have Been Completely Funded by the Coal Resource Transportation Fund

Requests for CRTS road and bridge improvements within the statutorily established counties can come from several sources, including coal companies, other organizations, legislators, and citizens. On requests within the officially sanctioned CRTS counties, repair requests go to the local district engineer for review and comment. The requests then go to the Central Office where they are reviewed by the Project Review Committee, followed by agreement preparation and issuance of a Commissioner's Order to raise the weight limit (Figure 5).

*Requests for CRTS road and bridge improvements within the statutorily established counties can come from several sources, including coal companies, other organizations, legislators, and citizens.*



According to DOH officials, all requests for CRTS projects have been given approval if and when a coal company agrees to the requirements of the DOH. No project requests have been outright denied; however, some companies have chosen not to initiate projects due to various reasons, including costs on their end, deciding not to open a proposed mine site, or some other reason not relayed to the DOH. The DOH has suggested the idea of a mandatory requirement for coal companies to contribute financially to any CRTS projects requested. However, a negative aspect of this requirement is that coal companies may be hesitant to request future repairs if they know they must help pay for them. The cumulative cost of all CRTS projects was \$29,809,323 as of October 31, 2011. Out of 52 projects completed or in the process of completion, 15 have been partially funded by coal companies and one was partially funded by the Wyoming County Board of Education for a total organizational contribution amount of \$2,161,500. Thirty projects have been completely funded by the CRTF for a total amount of \$21,608,817. Eight projects have been partially funded by the State Road Fund for a total expense of \$6,039,006; however, one project involving a bridge replacement in Kanawha County that was completed in 2009 consumed nearly half of that amount. Figure 6 displays the funding sources and totals for all CRTS projects. Table 3 illustrates the funding source percentages of CRTS projects for fiscal years 2004-2012. As demonstrated, a significant majority of CRTS projects are largely funded through the CRTF.

---

*The cumulative cost of all CRTS projects was \$29,809,323 as of October 31, 2011.*

---

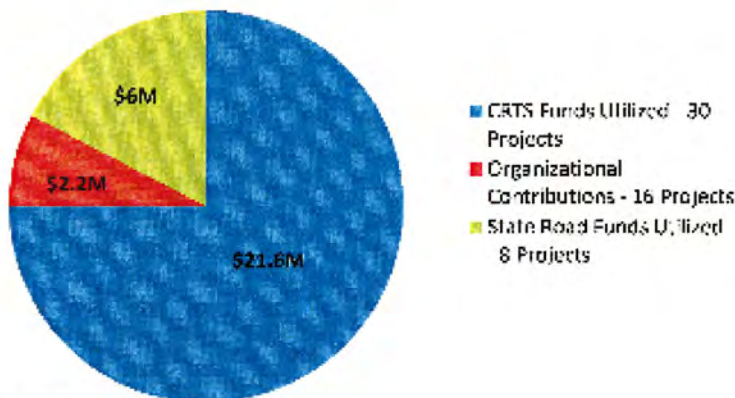


---

*Thirty projects have been completely funded by the CRTF for a total amount of \$21,608,817.*

---

**Figure 6  
CRTS Funding Sources**



Source: WVA Division of Highways (Unaudited)

Table 3  
Total CRTS Projects  
2004-2011

Fiscal Year	Completed Projects	Total Project Costs	Funding Source Percentage		
			CRTF	State Road	Other
2004	2	\$302,307	0%	11%	89%
2005	5	\$321,329	79%	0%	21%
2006	8	\$1,742,764	96%	0%	4%
2007	3	\$746,901	55%	0%	45%
2008	12	\$2,744,887	94%	0%	6%
2009	9	\$5,828,832	35%	53%	12%
2010	5	\$5,163,946	90%	3%	7%
2011*	6	\$10,290,339	90%	8%	2%
2012**	2	\$2,688,018	27%	73%	0%
<b>Total</b>	<b>52</b>	<b>\$29,809,323</b>	<b>72%</b>	<b>20%</b>	<b>8%</b>

\* Including Expected Completions  
 \*\* Expected Completions  
 Source: WV Division of Highways (Unaudited)

**While Nearly \$30 Million Has Been Spent on CRTS Projects, Five CRTS Counties Have Not Had Projects Initiated**

Out of the 18 counties that comprise the CRTS, 13 have had CRTS projects initiated or completed. The five counties that have had no CRTS projects undertaken are Braxton (9 CRTS miles), Clay (63 CRTS miles), Greenbrier (37 CRTS miles), Lincoln (39 CRTS miles), and Ohio (4 miles). One major reason there have been no projects is that these counties have some of the fewest miles on CRTS routes (Figure 7). Normal DOH methods are able to cover the maintenance and repair needs in those counties sufficiently at this time. The DOH has further speculated as to why these five counties have not requested funding for CRTS projects.

---

*Out of the 18 counties that comprise the CRTS, 13 have had CRTS projects initiated or completed.*

---

*[The lack of requests] may be attributed to the downturn in the economy and the actions of the Federal Environmental Protection Agency. We know that [the coal] industry is aware of the program since a representative of the West Virginia Coal Association serves as an appointed member to the Coal Resource Transportation Designation Committee.*

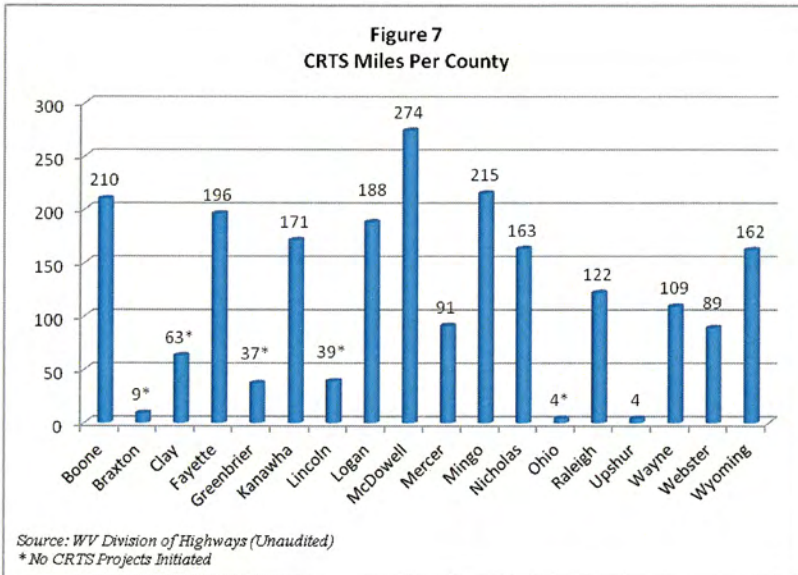
Figure 7 illustrates the total miles of CRTS routes in each county.

There are 2,143 total miles in the CRTS, which includes 747 bridges. McDowell County has the most miles included in the CRTS with 274, and has had the most projects completed with 15. A total of \$6,948,823 has been expended on projects in McDowell which is the highest among the counties followed by Kanawha County with four projects totaling \$6,530,507. Table 3 shows the total CRTS projects annually from 2004-2011. Table 4 shows each CRTS county, the number of projects, and the total dollar amount spent for county CRTS projects from 2004-2011. A full list of past and present CRTS projects is included in Appendix C.

---

*There are 2,143 total miles in the CRTS, which includes 747 bridges.*

---



County	Number of Projects	Total Dollar Amount for All County CRTS Projects
Boone	6	\$5,004,629
Braxton	0	\$0
Clay	0	\$0
Fayette	1	\$676,540
Greenbrier	0	\$0
Kanawha	4	\$6,530,507
Lincoln	0	\$0
Logan	4	\$513,312
McDowell	15	\$6,948,823



Mercer	1	\$374,147
Mingo	1	\$47,987
Nicholas	2	\$380,930
Ohio	0	\$0
Raleigh	7	\$689,174
Upshur	1	\$313,200
Wayne	2	\$4,921,143
Webster	1	\$59,856
Wyoming	7	\$3,349,075
<b>Total</b>	<b>52</b>	<b>\$29,809,323</b>
<i>Source: WV Division of Highways (Unaudited)</i>		

### **DOH Officials Report That Without the Supplemental Funding of the CRTS, Road and Bridge Repairs Would Take Longer to Complete and Would Have to Be Financed Through the State Road Fund**

Officials from the DOH have confirmed to the Legislative Auditor that the CRTS has proven to be a helpful, but supplemental, source of assistance with road and bridge maintenance. The roads and bridges of the CRTS would still have been repaired and maintained without the CRTS, albeit at a more protracted rate. At an average cost of \$1.95 million per bridge, and with 747 bridges within the CRTS, it is obvious that the financial resources needed on the CRTS exceed the amount of dedicated state funds available. The DOH projects that it would take approximately 20 years to make all the needed repairs and replacements on CRTS bridges using only the funds from the CRTF.

*The CRTS has certainly helped the DOH in repairing roads and bridges but it is not a panacea. The DOH would have repaired the roads but at a much slower pace due to our funding situation. Most of the money to fund such projects would have been from the State Road Fund and prioritized along with all other county projects.*

Thus, the DOH believes that the CRTS has been an overall effective supplemental source to successfully maintain West Virginia's roads and bridges in a timelier manner.

---

*The DOH projects that it would take approximately 20 years to make all the needed repairs and replacements on CRTS bridges using only the funds from the CRTF.*

---

## The Legislative Auditor Is Concerned That Current Fines Do Not Adequately Inhibit Overloading Coal Trucks

Officials of the Transportation Administration Division have expressed concerns that the current excess weight schedule as outlined in WV Code §17C-17A-10(a) (see Table 5) is not effectively persuading coal companies from overloading coal trucks.

*If the coal shipper would aim for the 120,000 pounds, they seldom would exceed 126,000. From observation, it appears to us that a certain number of sanctions received are simply a 'cost of doing business' and do not pose a financial risk to shippers.*

Coal companies can load trucks up to 4,000 lbs. beyond the legal limit and only be required to pay \$0.01 per overweight pound. A truck 8,000 lbs. beyond the legal limit is only fined \$0.03 per overweight pound. This means that a D-Class truck could haul loads of 134,000 lbs. (120,000 lbs. + five percent variance + 8,000 lbs. excess weight) and only pay \$240.00 in fines. PSC officials believe that many coal companies are writing off these relatively small fines as simply a cost of doing business. The current fines have not been increased since the creation of the CRTS. Transportation Administration Division officials have also suggested that calculating fines for overweight trucks that surpass the 126,000 lb. (120,000 lbs. + five percent variance) threshold starting back at the original 120,000 lb. limit may be an effective solution to curb trucks from being overloaded. Overweight trucks have had an increasingly negative impact on roads and bridges. **For example, the DOH has noted significant deterioration on highway lanes coming out of coal plants as opposed to the lanes going into the plant.** The same has been observed on bridges, with the outgoing lanes of bridges being significantly impaired as opposed to the lanes headed toward the plants. These outgoing lanes have been observed to be severely rutted and have deteriorated shoulders. The Legislative Auditor recommends that the Legislature consider reviewing the current excess-weight fine schedule to determine if it is acting as an effective deterrent in overloading trucks.

---

*Overweight trucks have had an increasingly negative impact on roads and bridges. For example, the DOH has noted significant deterioration on highway lanes coming out of coal plants as opposed to the lanes going into the plant.*

---

Amount of Excess Weight	Amount of Fine
1 to 4,000 pounds	1 cent per overweight pound
4,001 to 8,000 pounds	3 cents per overweight pound
8,001 to 12,000 pounds	7 cents per overweight pound
12,001 to 16,000 pounds	10 cents per overweight pound
16,001 to 20,000 pounds	15 cents per overweight pound
20,001 to 40,000 pounds	30 cents per overweight pound
40,001 pounds or more	45 cents per overweight pound

*Source: WV Code*

## Conclusion

The Legislative Auditor has determined that the Coal Resource Transportation System has assisted in financially supplementing 52 road and bridge projects in West Virginia since its creation in 2003. These 52 projects cost a total of almost \$30 million. Overall, the CRTS has collected over \$23 million in revenue through special permits and fees for coal transported on the CRTS roads, and transferred these funds to the Coal Resource Transportation Fund which is administered by the Division of Highways. Without this fund, road and bridge repair in the CRTS counties would have to be funded from the State Road Fund. One concern raised by DOH officials and PSC officials in the Transportation Administration Division is whether the current excess weight fines are serving as an effective deterrent to coal companies from carrying overweight loads. The Coal Resource Transportation Fund appears to be adequate and is funding the majority of CRTS projects allowing the Division of Highways to be less reliant on the State Road Fund. Revenue is sufficient for the fund to be sustained and the fund has kept a positive balance every fiscal year since its creation.

## Recommendation

*The Legislative Auditor recommends that the Legislature consider reviewing the current excess weight fine schedule to determine if it is acting as an effective deterrent in overloading trucks.*



## Appendix A: Objective, Scope and Methodology

This report of the Coal Resource Transportation System is authorized by West Virginia Code §4-2-5.

### **Objective**

The objective of this report was two-fold: the first was to determine if the CRTS roads and bridges that are subject to increased deterioration due to the weight of coal trucks were being adequately maintained and repaired, and the second was to determine if the CRTS was generating enough revenue to assist in this maintenance and repair.

### **Scope**

This report focused on data and information obtained from both the Public Service Commission and the Division of Highways for the fiscal years 2003-2011.

### **Methodology**

The Legislative Auditor utilized information from a number of sources. A site visit was conducted in October 2011 to the Transportation Administration Division of the Public Service Commission. Information regarding permits, notices of violations, and revenues raised from these sources was retrieved from the Public Service Commission. Information regarding CRTS maintenance and repair projects and the Coal Resource Transportation Fund was retrieved from the Division of Highways.















WEST VIRGINIA LEGISLATIVE AUDITOR

**PERFORMANCE EVALUATION & RESEARCH DIVISION**

Building 1, Room W-314, State Capitol Complex, Charleston, West Virginia 25305

telephone: 1-304-347-4890 | [www.legis.state.wv.us/Joint/PERD/perd.cfm](http://www.legis.state.wv.us/Joint/PERD/perd.cfm) | fax: 1-304-347-4939