

Hearing Date and Time: August 2, 2012 at 2:00 p.m.  
Objection Deadline: July 26, 2012 at 4:00 p.m.

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and

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*Co-Counsel for American Electric Power,  
Monongahela Power Company and  
Hope Gas, Inc. d/b/a Dominion Hope*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	)	
	)	Chapter 11
PATRIOT COAL CORPORATION, <i>et al.</i> ,	)	
	)	Case No. 12-12900 (SCC)
Debtors.	)	
	)	(Jointly Administered)
	)	
	)	

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**JOINDER OF AMERICAN ELECTRIC POWER,  
MONONGAHELA POWER COMPANY AND HOPE GAS, INC. d/b/a DOMINION  
HOPE TO THE CORRECTED MOTION OF THE UNITED MINE WORKERS OF  
AMERICA PURSUANT TO 28 U.S.C. § 1412 AND RULE 1014, FED. R. BANK. PROC.  
TO TRANSFER THE CASE TO THE SOUTHERN DISTRICT OF WEST VIRGINIA**

American Electric Power, Monongahela Power Company and Hope Gas, Inc., d/b/a Dominion Hope (collectively, the “ Joinder Utilities”), by counsel, hereby join in the *Corrected Motion of the United Mine Workers of America Pursuant To 28 U.S.C. § 1412 and Rule 1014, Fed. R. Bankr. Proc. To Transfer the Case To the Southern District of West Virginia* (the “Motion”) (Docket No. 127), and set forth the following:

**Facts Concerning the Joinder Utilities**

1. The Joinder Utilities provide utility goods/services to the Debtors at locations in the State of West Virginia.

2. The provision of utility goods/services by the Joinder Utilities to the Debtors is regulated by the Public Service Commission of West Virginia, and governed by applicable West Virginia state laws, regulations and/or tariffs.

3. As reflected by the *Notice of Filing of Revised List of Creditors Holding 50 Largest Unsecured Claims* (Docket No. 98), American Electric Power (“AEP”) and Monongahela Power Company (f/k/a Allegheny Power) (“Monongahela Power”) are two of the top 50 creditors holding unsecured claims against the Debtors. AEP estimates that the debt owed by the Debtors to AEP is approximately \$3.8 million. Monongahela Power estimates that the debt owed by the Debtors to Monongahela Power is approximately \$1,139,307.

**Relief Requested**

4. The Joinder Utilities adopt and incorporate by reference herein the *Relief Requested* section set forth in the Motion.

**Background Information**

5. The Joinder Utilities adopt and incorporate by reference herein the *Background*

*Information* section set forth in the Motion.

**Argument**

6. The Joinder Utilities adopt and incorporate by reference herein the *Argument* sections set forth in the Motion.

WHEREFORE, the Joinder Utilities respectfully request that this Court enter an order:

1. Granting the relief requested in the Motion; and
3. Providing such other and further relief as the Court deems just and appropriate.

**Dated: Garden City, New York  
July 25, 2012**

**MEYER, SUOZZI, ENGLISH & KLEIN, P.C.**

**By: /s/ Jessica Berman  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:** ) **Chapter 11**  
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**PATRIOT COAL CORPORATION, et al.,** ) **Case No. 12-12900 (SCC)**  
)  
**Debtors.** ) **(Jointly Administered)**  
)  
\_\_\_\_\_)

**CERTIFICATE OF SERVICE**

I, Jessica G. Berman, hereby certify that on July 25, 2012, I caused a true and correct copy of the *Joinder of American Electric Power, Monongahela Power Company, and Hope Gas, Inc. d/b/a Dominion Hope to the Corrected Motion of the United Mine Workers of America Pursuant*

*To 28 U.S.C. § 1412 and Rule 1014, Fed. R. Bankr. Proc. To Transfer the Case To the Southern District of West Virginia to be sent by via the Court's ECF System, and by first class mail, postage prepaid, on the parties listed below.*

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