

**FILE**

**BEFORE  
THE OHIO POWER SITING BOARD  
OF THE STATE OF OHIO**

RECEIVED-DOCKETING DIV  
2008 APR 17 AM 11:01  
PUCO

In the Matter of: ) Case No. 07-0171-EL-BTX  
The Certificate Application of )  
American Transmission Systems, Inc. )  
and The Cleveland Electric Illuminating )  
Company for a Certificate of )  
Environmental Compatibility and )  
Public Need for the Construction of the )  
Geauga County 138KV Transmission )  
Line Supply Project )

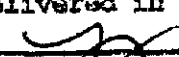
---

**INTERVENOR CARE'S MOTION TO CONDUCT SITE INSPECTION**

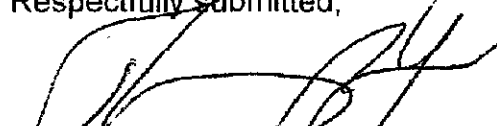
---

Pursuant to Ohio Administrative Code Rule 4906-7-12, Intervenor Citizens Advocating Responsible Energy ("CARE") hereby requests that the Ohio Power Siting Board, by and through the Administrative Law Judge and OPSB Staff, conduct a site inspection of: (1) the proposed project area, including the Cross Country and Clay Street Routes (identified in the Application as the Preferred and Alternate Routes, respectively); (2) State Route 11 and Mayfield Road; (3) the Rachel Modified Preferred Route, as identified in Ohio Power Siting Board in Case No. 95-0600-EL-BTX; and (4) the Pinegrove Substation in Chardon, Ohio.

A Memorandum in Support of this Motion is attached hereto and incorporated herein by reference.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician  Date Processed 4-12-08

Respectfully submitted,



Thomas J. Lee (0009529)

*tlee@taftlaw.com*

Julie A. Crocker (0081231)

*jcrocker@taftlaw.com*

Taft, Stettinius & Hollister LLP

200 Public Square, Suite 3500

Cleveland, OH 44114-2302

(216) 241-2838 (Telephone)

(216) 241-3707 (Facsimile)

Counsel for Intervenor Citizens  
Advocating Responsible Energy

**BEFORE  
THE OHIO POWER SITING BOARD  
OF THE STATE OF OHIO**

In the Matter of:	)	Case No. 07-0171-EL-BTX
The Certificate Application of	)	
American Transmission Systems, Inc.	)	
and The Cleveland Electric Illuminating	)	
Company for a Certificate of	)	
Environmental Compatibility and	)	
Public Need for the Construction of the	)	
Geauga County 138KV Transmission	)	
Line Supply Project	)	
	)	

---

**MEMORANDUM IN SUPPORT OF INTERVENOR CARE'S MOTION TO CONDUCT  
SITE INSPECTION**

---

CARE respectfully requests that the Ohio Power Siting Board ("OPSB"), by and through the Administrative Law Judge and OPSB Staff, conduct a site inspection of: (1) the proposed project area, including the Cross Country and Clay Street Routes (identified in the Application as the Preferred and Alternate Routes, respectively); (2) State Route 11 and Mayfield Road; (3) the Rachel Modified Preferred Route (the "Rachel Route"), which was the proposed transmission line route approved by the OPSB in Case No. 95-0600-EL-BTX; and (4) the Pinegrove Substation.

Examining the Cross Country and Clay Street Routes will allow the OPSB to fully see the environmental effects of construction of the transmission line corridor in the proposed project area. As evidenced by the Application, construction of either the Cross Country Route or the Clay Street Route will result in the destruction of many acres of forestland and farms as well as numerous wetland areas and residential properties. (See Appendix 06-1 of the Application.) CARE requests that the OPSB

view these areas in order to gain a clear understanding of the true environmental impact that either the Cross Country or Clay Street Routes will cause.

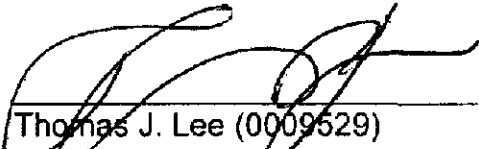
CARE also requests that the State Route 11 and Mayfield Road route (referenced in Interrogatory No. 15 of Staff's first Set of Interrogatories) and the previously-approved Rachel Route be examined during the proposed site inspection. The Rachel Route and State Route 11/Mayfield Road are two alternate routes along which the proposed transmission line could be constructed. Moreover, construction of the transmission line along these possible routes would result in substantially less environmental and residential devastation. A comparison of these possible alternate routes with the Cross Country and Clay State Routes will demonstrate the practicality of using an existing corridor for the proposed transmission line as opposed to using the Cross Country or Clay State Routes, which require a new utility corridor to be bored through undeveloped areas.

In addition, as part of the Rachel Route inspection, CARE requests that OPSB view the location of the Pinegrove Substation located on Fifth Avenue in Chardon. It is CARE's understanding that, subsequent to the approval of the Rachel Modified Approved Route, First Energy constructed or improved the Pinegrove Substation, and added to it a 138 kV Q3 Transmission Line (circuit designation Q-3-AT-MF) i.e. the circuit which Applicants propose be extended with the instant proposal. CARE believes that the Pinegrove Substation is the location nearest to the area needing power at which access to circuit Q-3-AT-MF can be obtained.

Accordingly, CARE respectfully requests that a site inspection be conducted in order for the OPSB to examine: (1) the proposed project area, including the Cross

Country and Clay Street Routes; (2) State Route 11 and Mayfield Road; (3) the Rachel Modified Preferred Route; and (4) the Pinegrove Substation in Chardon.

Respectfully submitted,



Thomas J. Lee (0009529)

[tlee@taftlaw.com](mailto:tlee@taftlaw.com)

Julie A. Crocker (0081231)

[jcrocker@taftlaw.com](mailto:jcrocker@taftlaw.com)

Taft, Stettinius & Hollister LLP

200 Public Square, Suite 3500

Cleveland, OH 44114-2302

(216) 241-2838 (Telephone)

(216) 241-3707 (Facsimile)

Counsel for Intervenor Citizens  
Advocating Responsible Energy

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Motion To Relocate Hearing and Conduct Site Inspection was served this 16<sup>th</sup> day of April, 2008, via regular U.S. Mail upon the following:

Christopher Schraff  
Robert J. Schmidt, Jr.  
Porter Wright Morris & Arthur  
41 South High Street  
Columbus, Ohio 43215

*Attorneys for Applicants*  
*American Transmission Systems, Inc.*  
*And The Cleveland Electric Illuminating*  
*Company*

Ted Krauss  
American Transmission Systems, Inc.  
76 South Main Street  
Akron, Ohio 44308-1890

*Representative of Applicant American*  
*Transmission Systems, Inc.*

Morgan Parke  
Michael R. Beiting  
First Energy Service Company  
76 South Main Street  
Akron, Ohio 44308

*Representatives of Applicants*  
*American Transmission Systems, Inc.*  
*and The Cleveland Electric*  
*Illuminating Company*

  
Thomas J. Lee