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BEFORE THE OHIO POWER SITING BOARD

- - -

In the Matter of an :
Application by American :
Municipal Power-Ohio :
for a Certificate :
of Environmental : Case No. 06-1357-EL-BTX
Compatibility and Public :
Need for the American :
Municipal Power-Ohio :
345 kV Transmission Line. :

- - -

PROCEEDINGS

before Mr. Gregory A. Price, Hearing Examiner, at the
Public Utilities Commission of Ohio, 180 East Broad
Street, Room 11-F, Columbus, Ohio, called at 10:00
a.m. on Monday, October 27, 2008.


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**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of) American Municipal Power-Ohio, Inc., for a) Certificate of Environmental Compatibility) And Public Need for an Electric) Power Transmission Line and) Related Facilities.)	Case No. 06-1357-EL-BTX
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**JOINT STIPULATION
AND
RECOMMENDED FINDINGS OF FACT
AND
CONCLUSIONS OF LAW**

American Municipal Power-Ohio, Inc. ("AMP-Ohio" or "Applicant"), on behalf of its members, and the Staff of the Ohio Power Siting Board (collectively referred to as "the Parties") submit this Joint Stipulation and Recommended Findings of Fact and Conclusions of Law ("Joint Stipulation") for adoption by the Ohio Power Siting Board ("Board"). This Joint Stipulation is intended by the Parties to resolve all matters pertinent to AMP-Ohio's proposed 345 kilovolt ("kV") American Municipal Power Generating Station transmission line and related facilities ("AMPGS Transmission Line").

I. Introduction

AMP-Ohio proposes to construct the 345 kV AMPGS Transmission Line in southern Meigs County, Ohio. The purpose of the project is to transmit the electricity generated by the proposed 960 megawatt ("MW") American Municipal Power Generating Station ("AMPGS"). The transmission project will consist of an approximately 5-mile long, double circuit 345 kV transmission line, with a right-of-way ("r-o-w") of 150 feet. The line will be supported by single shaft, self-supporting tubular steel pole structures. The transmission project will begin at the

AMPGS and will interconnect with the existing 345 kV Sporn-Muskingum River transmission line located north of the AMPGS. The AMPGS Transmission Line project is more fully described in AMP-Ohio's Application for a Certificate of Environmental Compatibility and Public Need for an Electric Power Transmission Line and Related Facilities ("Application"), which was filed with the Board on October 31, 2007 and supplemented by a filing on December 27, 2007. AMP-Ohio also submitted data in response to Staff requests on July 18, 2008 and September 25, 2008.

This Joint Stipulation results from discussions between the Parties, who agree that this Joint Stipulation is supported by the record and is, therefore, entitled to careful consideration by the Board. Accordingly, the Parties recommend that the Board issue a Certificate of Environmental Compatibility and Public Need ("Certificate") for the AMPGS Transmission Line as identified in the Application, subject to the conditions contained herein.

II. Stipulations

A. Recommended Findings of Fact

The Parties agree that the record in this case contains sufficient probative evidence for the Board to find and determine, as findings of fact, that:

- 1) AMP-Ohio is an Ohio, nonprofit corporation doing business in Ohio and is considered a "person" as defined in Revised Code ("R.C.") 4906.01(A).
- 2) The proposed AMPGS Transmission Line is a "major utility facility" as defined in R.C. 4906.01(B)(2).
- 3) On December 5, 2006, the Applicant held a public informational meeting in Meigs County, Ohio regarding the proposed AMPGS Transmission Line.
- 4) On October 31, 2007, AMP-Ohio filed its Application for the AMPGS

Transmission Line project with the Board under docket number 06-1357-EL-BTX.

- 5) On December 27, 2007, the Applicant filed supplemental information to the Application.
- 6) On July 18, 2008 and September 25, 2008, the Applicant submitted data to the Staff in response to Staff requests.
- 7) On December 27, 2007, the Chairman of the Board issued a letter to the Applicant stating that the Application, filed on October 31, 2007, had been found to comply with the requirements of Ohio Administrative Code ("O.A.C.") Chapter 4906-01, *et seq.*
- 8) On January 18, 2008, the Applicant filed proof of service of the Application on local officials and libraries in accordance with O.A.C. 4906-5-08.
- 9) On July 25, 2008, the Administrative Law Judge issued an Entry scheduling a local public hearing for this case to take place on October 22, 2008 at 6:00 p.m. at Southern High School, 920 Elm Street, Racine, Ohio 45771. The adjudicatory hearing was scheduled to take place on October 27, 2008 at 10:00 a.m. in Hearing Room 11-C at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, Columbus, Ohio 43215.
- 10) On August 20, 2008, the Applicant filed proof of publication of the first newspaper notice of the AMPGS Transmission Line project, as required by O.A.C. 4906-5-08. The first notice was published on August 8, 2007 in The Daily Sentinel, Pomeroy, Ohio.
- 11) On September 22, 2008, the Applicant filed a list of persons who received letters

describing the AMPGS Transmission Line project and the certification process, as required by O.A.C. 4906-5-08. The letters were sent via first class mail on September 19, 2008.

- 12) On October 7, 2008, the Staff issued and filed its "Staff Report of Investigation" for the AMPGS project, recommending that the Certificate of Environmental Compatibility and Public Need be issued as described in the Certificate Application and the supplemental information, subject to certain specified conditions.
- 13) On October 15, 2008, the Applicant filed proof of publication of the second newspaper notice of the AMPGS Transmission Line project, as required by O.A.C. 4906-5-08. The second notice was published on October 9, 2008 in The Daily Sentinel, Pomeroy, Ohio.
- 14) A public hearing was held on October 22, 2008 at Southern High School in Racine, Ohio.
- 15) The adjudicatory hearing was convened on October 27, 2008 at the offices of the Public Utilities Commission of Ohio in Columbus, Ohio.
- 16) Adequate data on the proposed AMPGS Transmission Line project has been provided to the Board and its Staff to determine the basis of need for the AMPGS Transmission Line, as required by R.C. 4906.10(A)(1).
- 17) Adequate data on the proposed AMPGS Transmission Line project has been provided to the Board and its Staff to determine the nature of the probable environmental impact of the AMPGS Transmission Line, as required by R.C. 4906.10(A)(2).

- 18) Adequate data on the proposed AMPGS Transmission Line project has been provided on the record to the Board and its Staff to determine that, with the required conditions, the AMPGS Transmission Line represents the minimum adverse environmental impact, considering the available technology and nature and economics of the various alternatives, and other pertinent considerations, as required by R.C. 4906.10(A)(3).
- 19) Adequate data on the proposed AMPGS Transmission Line project has been provided on the record to the Board and its Staff to determine that, with the required conditions, the AMPGS Transmission Line is consistent with regional plans for expansion of the electric power grid of the electric systems serving this state and interconnected utility systems and that the AMPGS Transmission Line will serve the interests of electric system economy and reliability, as required by R.C. 4906.10(A)(4).
- 20) Adequate data on the proposed AMPGS Transmission Line project has been provided on the record to the Board and its Staff to determine that the AMPGS Transmission Line will comply with R.C. Chapters 3704, 3734, and 6111, R.C. Sections 1501.33, 1501.34, and 4561.32, and all applicable regulations adopted thereunder, as required by R.C. 4906.10(A)(5).
- 21) Adequate data on the proposed AMPGS Transmission Line project has been provided on the record to the Board and its Staff to determine that, with the required conditions, the AMPGS Transmission Line will serve the public interest, convenience, and necessity, as required by R.C. 4906.10(A)(6).
- 22) Adequate data on the proposed AMPGS Transmission Line project has been

provided on the record to the Board and its Staff to determine the AMPGS Transmission Line's impact on the viability as agricultural land of any land in an existing agricultural district established under R.C. Chapter 929 that is located within the AMPGS site, as required by R.C. 4906.10(A)(7).

- 23) Adequate data on the proposed AMPGS Transmission Line project has been provided on the record to the Board and its Staff to determine that the AMPGS Transmission Line incorporates maximum feasible water conservation practices, considering available technology and the nature and economics of various alternatives, as required by R.C. 4906.10(A)(8).
- 24) The information, data, and evidence in the record of this proceeding provide substantial and adequate evidence and information to enable the Board to make an informed decision on the Application for the AMPGS Transmission Line.

B. Recommended Conclusions of Law

The Parties further agree that the record in this case contains sufficient probative evidence, if conditions in the Certificate are adopted as recommended by the Parties, for the Board to find and determine, as conclusions of law, that:

- 1) The Applicant is a "person" under R.C. 4906.01(A).
- 2) The AMPGS Transmission Line is a "major utility facility" as defined in R.C. 4906.01(B)(2).
- 3) The Applicant's Certificate Application, as supplemented and further clarified by data submissions, complies with the requirements of O.A.C. 4906-15-01, *et seq.*
- 4) The record establishes the basis of need for the AMPGS Transmission Line, as required by R.C. 4906.10(A)(1).

- 5) The record establishes the nature of the probable environmental impact from construction, operation, and maintenance of the AMPGS Transmission Line, as required by R.C. 4906.10(A)(2).
- 6) The record establishes that the proposed AMPGS Transmission Line represents the minimum adverse environmental impact, considering the state of available technology and the nature and economics of the various alternatives, and other pertinent considerations, as required by R.C. 4906.10(A)(3).
- 7) The record establishes that the proposed AMPGS Transmission Line is consistent with regional plans for expansion of the electric power grid of the electric systems serving this state and interconnected utility systems and that the AMPGS Transmission Line will serve the interests of electric system economy and reliability, as required by R.C. 4906.10(A)(4).
- 8) The record establishes that the AMPGS Transmission Line will comply with R.C. Chapters 3704, 3734, and 6111, R.C. Sections 1501.33, 1501.34, and 4561.32, and all applicable regulations adopted thereunder, as required by R.C. 4906.10(A)(5).
- 9) The record establishes that the AMPGS Transmission Line will serve the public interest, convenience, and necessity, as required by R.C. 4906.10(A)(6).
- 10) The record establishes that the impact of the AMPGS Transmission Line on the viability as agricultural land of any land in an existing agricultural district established under R.C. Chapter 929 that is located within the AMPGS Transmission Line site has been determined, as required by R.C. 4906.10(A)(7).
- 11) The record establishes that the proposed AMPGS Transmission Line incorporates

maximum feasible water conservation practices, considering available technology and the nature and economics of the various alternatives, as required by R.C. 4906.10(A)(8).

C. Recommended Conditions of the Certificate of Environmental Compatibility and Public Need

The Parties stipulate and recommend to the Board that it issue a Certificate of Environmental Compatibility and Public Need, as requested by the Applicant, for the AMPGS Transmission Line, as described in the Application and supplemental information, and subject to the following conditions:

- 1) That the facility be installed following the Applicant's Preferred Route as presented in the application filed on October 31, 2007, and as further clarified by the Applicant's supplemental filings.
- 2) That the Applicant shall utilize the equipment and construction practices as described in the application and as modified in supplemental filings, replies to data requests, and recommendations Staff has included in the Staff Report of Investigation.
- 3) That the Applicant shall implement mitigative measures, described in the application, any supplemental filings, and recommendations Staff has included in the Staff Report of Investigation.
- 4) That prior to construction, Applicant shall prepare a transmission line mitigation plan for Staff's review and approval that addresses terrestrial, wetland and stream impacts. The plan shall include the following elements:
 - a) Applicant shall obtain the rights of up to 39 acres of real property, preferably wooded, in the project area, or its qualitative equivalent, to be preserved through a conservation easement. This property shall be separate from, and in addition to, any other locations previously identified by the Applicant for mitigation associated with AMPGS.
 - b) The portions of W1 and W2 within the transmission corridor r-o-w will be protected with a conservation easement that prohibits any other land use.
 - c) If trees within the r-o-w and within 50 feet on each side of any stream have to be cleared, then the area will be replanted with lower growing

native species. Species will be selected to match the allowable growth height that does not interfere with the safe operation of the facility.

- 5) That the Applicant shall prepare a detailed tree clearing plan describing how trees and shrubs along the proposed alignment will be protected from damage during construction, and, where clearing cannot be avoided, how such clearing work will be done so as to minimize removal of woody vegetation and mitigate for trees that are to be removed. Priority should be given to protecting mature trees throughout the corridor, and all woody vegetation in wetlands and riparian areas, by the use of increased pole heights, reduced width rights-of-way, and other practical methods. This tree clearing plan, which should also address the following items, shall be submitted to Staff for review and approval prior to initiation of construction.
 - a) That the Applicant shall limit tree clearing to the months of October through March unless specific pre-approval is granted by Staff. If tree clearing must be conducted outside of this period, the Applicant shall, prior to tree clearing, conduct Indiana bat surveys in areas identified as suitable habitat in coordination with Staff.
 - b) That the Applicant shall flag wetland boundaries and prohibit vehicle access to wetlands, unless otherwise preapproved by Staff. Any vegetation clearing within wetlands shall be conducted solely by hand and shall retain all low-growing plant species, particularly woody ones, unless otherwise directed by Staff.
 - c) That the Applicant shall prohibit the use of herbicides within 50 feet of streams and wetlands during initial construction and future r-o-w maintenance. Prior to construction, the Applicant shall submit a plan describing planned herbicide use for review and approval by the Staff.
 - d) That the Applicant shall retain all tree snags within the r-o-w that do not present a safety or reliability concern for the construction, operation, and maintenance of the new electric transmission line.
- 6) That the Applicant shall limit clearing in all riparian areas and, specifically, within 50 feet of any streams for the construction, operation, and maintenance of the facility. Vegetation clearing in these areas shall be selective hand clearing of taller-growing trees only, leaving all low-growing plant species, particularly wood ones (including other trees), undisturbed unless otherwise directed by Staff. All stumps shall be left in place.
- 7) That prior to the commencement of construction, the Applicant shall develop and submit to Staff for review and approval an effective long-term plan to be adopted for use by the Applicant for all wetlands and riparian areas within the project r-o-w so that they can be readily identified (e.g.

permanent signage delineating "no clearing" areas and notations on future maintenance plans) and protected from clearing (including use of herbicides) during all future r-o-w maintenance.

- 8) That the Applicant shall protect the endangered spadefoot breeding pond and associated habitat locations within the r-o-w and prevent vehicle access to these areas. Use of herbicides near these locations during construction and maintenance activities shall be prohibited. Prior to construction, the Applicant shall provide for Staff review and approval a threatened and endangered species protection plan. This plan shall focus on measures to protect the eastern spadefoot, as well as any other endangered or threatened aquatic species, the habitat for which is identified in the construction area. This shall include specific r-o-w clearing/avoidance recommendations, herbicide restrictions, mitigation options, and potential monitoring procedures, along with construction timing limitations related to breeding activities and the potential impacts of long-term r-o-w maintenance work.
- 9) That the Applicant shall have an environmental specialist on-site during clearing and all other construction activities within or near environmentally-sensitive areas, including streams, wetlands, and wooded areas.
- 10) That the Applicant shall immediately contact Staff, ODNR, and USFWS (for federally-listed species) if threatened or endangered species are encountered during construction activities. Activities that could adversely impact the identified species will be halted until an appropriate course of action has been agreed upon by the Applicant and Staff.
- 11) That prior to the commencement of construction, the Applicant shall present a plan to Staff for review and approval that mitigates potential recreational off-road vehicle use of the utility corridor to the extent practicable.
- 12) That the Applicant shall properly install and maintain erosion and sedimentation control measures at the project site in accordance with the following requirements:
 - a) During construction of the facility, seed all disturbed soil, except within cultivated agricultural fields, within seven (7) days of final grading with a seed mixture acceptable to the appropriate County Cooperative Extension Service. Denuded areas, including spoils piles, shall be seeded and stabilized within seven (7) days, if they will be undisturbed for more than twenty-one (21) days. Reseeding shall be done within seven days of emergence of seedlings as necessary until sufficient vegetation in all areas has been established.
 - b) Inspect and repair all erosion control measures after each rainfall event of one-half of an inch or greater over a twenty-four (24) hour period, and

maintain controls until permanent vegetative cover has been established on disturbed areas.

- c) Obtain NPDES permits for storm water discharges during construction of the facility. A copy of each permit or authorization, including terms and conditions, shall be provided to the Staff within seven (7) days of receipt. At least seven (7) days prior to the pre-construction conference, the construction Storm Water Pollution Prevention Plan shall be submitted to the Staff for review and acceptance.
- 13) That the Applicant shall minimize fugitive dust emissions through the use of water spray or other appropriate dust suppressant measures when necessary.
- 14) That the Applicant shall coordinate with the appropriate authority regarding any vehicular lane closures during construction.
- 15) That the Applicant shall avoid, where possible, or minimize to the maximum extent practicable, any damage to field drainage systems resulting from construction and operation of the facility. Damaged field tile systems shall be repaired to at least original conditions at Applicant's expense.
- 16) That the Applicant shall remove all temporary gravel and other construction laydown area and temporary access road materials within fourteen (14) days of completing construction activities.
- 17) That the Applicant shall not dispose of gravel or any other construction material during or following construction of the facility by spreading such material on agricultural land, unless a landowner requests that non-hazardous debris be left in non-environmentally sensitive areas of their property. All construction debris and any contaminated soil shall be promptly removed and properly disposed of in accordance with Ohio EPA regulations.
- 18) That if the Board selects the Alternate Route, the Applicant shall prepare a Phase I Cultural Resources Survey prior to construction. The survey shall be coordinated with the State Historic Preservation Office and submitted to Staff for review and acceptance at least 30 days prior to construction. If the survey discloses a find of cultural or archaeological significance, or a site that could be eligible for inclusion on the National Register of Historic Places, then the Applicant shall submit a route amendment, route modification, or mitigation plan for Staff's acceptance. The Applicant shall consult with Staff to determine the appropriate course of action.
- 19) That prior to the commencement of construction, the Applicant shall obtain and comply with all applicable permits and authorizations as required by federal and state laws and regulations for any activities where such permit or

authorization is required. Copies of permits and authorizations, including all supporting documentation, shall be provided to Staff within seven (7) days of issuance or receipt by the Applicant.

- 20) That the Applicant shall not commence construction of the facility until it has entered into an Interconnection Service Agreement with PJM, which includes construction of any system upgrades required by PJM.
- 21) That the Applicant shall conduct a pre-construction conference prior to the start of any project work, which the Staff shall attend, to discuss how environmental concerns will be satisfactorily addressed.
- 22) That at the time of the pre-construction conference, the Applicant shall have marked structure locations, the route's centerline and r-o-w clearing limits in environmentally sensitive areas.
- 23) That at least thirty (30) days before the pre-construction conference, the Applicant shall submit to the Staff, for review and approval, one set of detailed drawings for the certificated facility, including all laydown areas and access points; so that the Staff can determine that the final project design is in compliance with the terms of the certificate. The access plan shall consider the location of streams, wetlands, wooded areas, and threatened and endangered species.
- 24) That at least thirty (30) days prior to the pre-construction conference, the Applicant shall submit a detailed construction and restoration plan for all stream and wetland crossings for Staff's review and approval. The plan shall include sufficiently detailed information to address the following:
 - a) Construction methods to be used at each location, including site-specific access and equipment crossing proposals. Construction methods and equipment movement during both dry and wet conditions should be included.
 - b) Storm water erosion control practices to be used during construction work in and around each crossing location.
 - c) Any and all stream stabilization and wetland, stream, and riparian area restoration practices to be used.
 - d) That the Applicant shall use necessary means to ensure that no trees, limbs, branches, or other clearing residue is placed or disposed of in any stream, wetland, or other water body.
 - e) That the Applicant shall use necessary means to ensure that no fill, topsoil, stone, or other construction-related material is placed or

disposed of in any stream, wetland, or other water body, except for the short-term placement of stone, culvert pipe, timber mats, or other temporary stream crossing materials, as pre-approved by Staff.

- f) That to the extent practicable, crossings of ephemeral streams should occur during no flow periods.
- 25) That the certificate shall become invalid if the Applicant has not commenced a continuous course of construction of the proposed facility within five (5) years of the date of journalization of the certificate.
- 26) That the Applicant shall provide to the Staff the following information as it becomes known:
 - a) The date on which construction will begin;
 - b) The date on which construction was completed;
 - c) The date on which the facility began commercial operation.

D. Exhibits

The Parties agree, stipulate, and recommend that the following exhibits in the docket be marked and admitted into the record of this proceeding, and that cross-examination is waived thereon:

- o Applicant Exhibit No. 1: The Certificate Application filed on October 31, 2007 and certified as complete by the Board on December 27, 2007.
- o Applicant Exhibit No. 2: The supplemental information to the Application filed by the Applicant on December 27, 2007.
- o Applicant Exhibit No. 3: AMP-Ohio's submissions on July 18, 2008 and September 25, 2008 in response to Staff data requests.
- o Applicant Exhibit No. 4: Proofs of publication of the first and second notices required by O.A.C. 4906-5-08, as filed with the Board on August 20, 2008 and October 15, 2008.

- Applicant Exhibit No. 5: A list of landowners within the planned route of the AMPGS Transmission Line and each property owner who may be approached by AMP-Ohio for any additional easement necessary for the construction, operation, or maintenance of the AMPGS Transmission Line who received letters describing the AMPGS Transmission Line, the certification process, and the public hearing dates, as required by O.A.C. 4906-5-08.
- Staff Exhibit No. 1: Staff Report of Investigation filed on October 7, 2008.
- Joint Exhibit No. 1: This Joint Stipulation, signed by counsel for the Applicant and Staff.

E. Other Stipulations

- 1) This Joint Stipulation is expressly conditioned upon its acceptance by the Board without material modification. In the event the Board rejects or materially modifies all or part of this Joint Stipulation, or imposes additional conditions or requirements upon the Parties, each Party shall have the right, within thirty (30) days of the Board's Order, to file an Application for Rehearing with the Board. Upon Rehearing by the Board, each Party shall have the right, within ten (10) days of the Board's Order on Rehearing, to file a Notice of Termination and Withdrawal of this Joint Stipulation. Upon Notice of Termination and Withdrawal of this Joint Stipulation by any Party, pursuant to the above provisions, this Joint Stipulation shall immediately become null and void. In such an event, a hearing shall go forward, and the Parties shall be afforded the opportunity to present evidence through witnesses, to cross-examine all witnesses, to present rebuttal testimony, and to file briefs on all issues.

- 2) The Parties agree and recognize that this Joint Stipulation has been entered into only for the purpose of resolving this proceeding. Each Party agrees not to assert against the other Party in any proceeding before the Board or any court, other than in a proceeding to enforce the terms of this Joint Stipulation, that Party's participation in this Joint Stipulation as support for any particular position on any issue. Each Party further agrees that it will not use this Joint Stipulation as factual or legal precedent on any issue. The Parties request that the Board recognize that its use of this Joint Stipulation in any proceeding other than this proceeding is contrary to the intentions of the Parties in entering into this Joint Stipulation.

WHEREFORE, based upon the record, and the information and data contained therein, the Parties recommend that the Board issue a Certificate of Environmental Compatibility and Public Need for construction, operation, and maintenance of the AMPGS Transmission Line, as described in the Certificate Application and supplemental filing made with the Board.

The undersigned stipulate and represent that they are authorized to enter into this Joint Stipulation on this the 27th day of October 2008.

ON BEHALF OF THE STAFF OF
THE OHIO POWER SITING BOARD

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